

1 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

2 **DARRELL T. COKER,**

Supreme Court No. 71317

3 Plaintiff/Appellant,

4 vs.

Electronically Filed
District Court Case No. 2018-16-734853-C
DEPT. XXVIII May 04 2018 03:35 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

5 **MARCO SASSONE,**

6 Plaintiff/Respondent.

7
8 **On Appeal from the**

9 **Eighth Judicial District Court, State of Nevada**

10 **RESPONDENT MARCO SASSONE'S APPENDIX OF EXHIBITS**

11 **VOLUME I**

12 GENTILE CRISTALLI
13 MILLER ARMENI SAVARESE
14 DOMINIC P. GENTILE

15 Nevada Bar No. 1923
16 Email: dgentile@gcmaslaw.com

17 CLYDE DEWITT

18 Nevada Bar No. 9791
19 Email: cdewitt@gcmaslaw.com

20 LAUREN E. PAGLINI

21 Nevada Bar No. 14254
22 Email: lpaglini@gcmaslaw.com
23 410 South Rampart Blvd., Suite 420
24 Las Vegas, Nevada 89145

25 Tel: (702) 880-0000/Fax: (702) 778-9709

26 Attorneys for Plaintiff/ Respondent Marco Sassone

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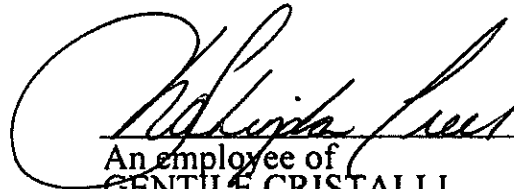
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1 **CERTIFICATE OF MAILING**

2 The undersigned, an employee of Gentile Cristalli Miller Armeni Savarese,
3 hereby certifies that on the 4th day of May, 2018, she served a copy of
4 **RESPONDENT MARCO SASSONE'S APPENDIX OF EXHIBITS**
5 **VOLUME I**, to all interested parties by electronic service and by placing said
6 copy in an envelope, postage fully prepaid, in the U.S. Mail at Las Vegas, Nevada,
7 said envelope addressed to:

8 Marc J. Randazza, Esq.
9 Randazza Legal Group
10 4035 El Capitan Way
11 Las Vegas, Nevada 89147
12 Attorney for Appellant

13 
14 An employee of
15 GENTILE CRISTALLI
16 MILLER ARMENI SAVARESE
17
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CLERK OF THE COURT

1 **OST**
2 GENTILE CRISTALLI
3 MILLER ARMENI SAVARESE
4 DOMINIC P. GENTILE
5 Nevada Bar No. 1923
6 Email: dgentile@gemastlaw.com
7 410 S. Rampart Blvd., Suite 420
8 Las Vegas, NV 89145
9 Telephone (702) 880-0000
10 Facsimile (702) 778-9709
11 Attorneys for Plaintiff Marco Sassone

8 **EIGHTH JUDICIAL DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

File with

10 MARCO SASSONE,

11 Plaintiff,

12 vs.

13 DARRELL T. COKER an individual,
14 DARRELL R. COKER, JR an individual,
15 RICHARD MORELLO an individual,
16 DARRYL MCCULLOUGH an individual,
17 AND THE JELLO'S JIGGLIN, LLC d/b/a
18 Postal Annex, DOES 1-10, and ROE
19 ENTITIES 1-10, inclusive,

20 Defendants.

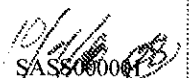
CASE NO. A-16-742853-C Master Calendar
DEPT. XXVIII

**APPLICATION FOR PREJUDGMENT
WRIT OF ATTACHMENT WITHOUT
NOTICE; AND APPLICATION FOR
ORDER SHORTENING TIME**

19 Plaintiff, MARCO SASSONE ("Marco"), by and through his counsel, the law firm of
20 Gentile Cristalli Miller Armeni Savarese, hereby applies to this Court, pursuant to Chapter 31 of
21 the Nevada Revised Statutes ("NRS"), for an Order Directing Issuance of a Prejudgment Writ of
22 Attachment as to certain real property held by Defendants DARRELL T. COKER and
23 DARRELL R. COKER (collectively herein, "Defendants"). Without the issuance of a
24 prejudgment writ of attachment on the real property, there is a substantial likelihood that
25 Defendants' property may be sold and/or transferred, despite the real property being subject to
26 execution on any judgment obtained under Marco's claims in this action.

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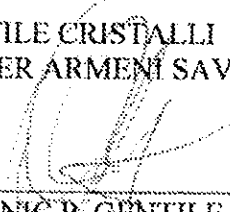

SASS000001

1 Pursuant to Eighth Judicial District Court Rule ("EDCR") 2.26, Defendants request that
2 this Application be heard on shortening time.

3 This Application and Application for Order Shortening Time are made and based on the
4 following the Affidavit of Dominic P. Gentile, Esq. (the "Gentile Affidavit") submitted in
5 compliance with EDCR 2.26; the Memorandum of Points and Authorities, the attachments
6 thereto, including the Affidavit of Donald Dibble attached hereto as **Exhibit 1** (the "Dibble
7 Affidavit"), the other papers and pleadings on file herein, and any oral argument the Court may
8 permit at the hearing of this matter.

9 Dated this 27th day of October, 2016.

10 GENTILE CRISTALLI
11 MILLER ARMENI SAVARESE

12 
13 DOMINIC P. GENTILE
14 Nevada Bar No. 1923
15 410 S. Rampart Blvd., Suite 420
16 Las Vegas, NV 89145
17 Telephone (702) 880-0000
18 Attorneys for Plaintiff Marco Sassone

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1 ORDER SHORTENING TIME

2 Good Cause Appearing Therefore,

3 IT IS HEREBY ORDERED that the time for hearing of the foregoing Application is
4 shortened to be heard on the 13 day of October, 2016, at the hour of 9:00
5 o'clock a.m., or as soon thereafter as counsel may be heard in Dept. XXVIII.

6 IT IS HEREBY ORDERED this 4 day of Oct, 2016.

7 
8 DISTRICT COURT JUDGE
9

10 Prepared and submitted by:

11 GENTILE CRISTALLI
12 MILLER ARMENI SAVARESE
13 

14 DOMINIC P. GENTILE
15 Nevada Bar No. 1923
16 410 S. Rampart Blvd., Suite 420
17 Las Vegas, NV 89145
18 Telephone (702) 880-0000
19 Attorneys for Plaintiff Marco Sassone

20 **AFFIDAVIT OF DOMINIC P. GENTILE, ESQ. IN SUPPORT OF**
21 **MOTION FOR ORDER SHORTENING TIME**

22 STATE OF NEVADA)
23) ss.
24 COUNTY OF CLARK)

25 Dominic P. Gentile, Esq., being first duly sworn, deposes and states as follows:

26 1. I am an attorney licensed to practice law in the State of Nevada and am a partner
27 in the law firm of Gentile Cristalli Miller Armeni Savarese, attorney for Plaintiff.

28 2. I am competent to testify to the matters asserted herein, of which I have personal
knowledge, except as to those matters stated upon information and belief. As to those matters
stated upon information and belief, I believe them to be true.

3. I make this Affidavit in support of Plaintiff's Application for Prejudgment Writ of

1 Attachment Without Notice; and Motion for Order Shortening Time.

2 4. There exists good cause to hear the Application for Prejudgment Writ of
3 Attachment on shortened time.

4 5. Defendants have demonstrated a pattern and practice of fraud by their operation
5 of numerous fraudulent schemes and enterprises, criminal history, and repetitive name change
6 petitions.

7 6. Defendants' continuing pattern and practice of fraud creates a substantial
8 likelihood that Defendants will give, assign, pledge, dispose of, or conceal their property, and
9 Plaintiff will be unable to collect the debts due.

10 7. Defendants' continuing pattern and practice of fraud causes Plaintiff to suffer
11 concomitant irreparable harm as it diminishes Plaintiff's reputation and substantially dilutes the
12 value of Plaintiff's works of art.

13 8. Due to the exigent circumstances, this Application for Prejudgment Writ of
14 Attachment cannot await a hearing in the ordinary course, in that if no action is taken, there is a
15 substantial likelihood that Defendants' property may be sold and/or transferred, despite the real
16 property being subject to execution on any judgment obtained under Plaintiff's claims in this
17 action.

18 9. This Motion for an Order Shortening Time is made in good faith.

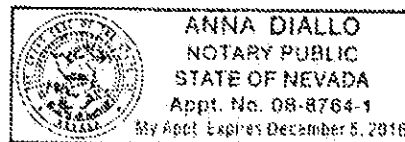
19 Further, Affiant sayeth naught.

20 DATED this 30th day of October, 2016.

21
22
23 _____
Dominic P. Gentile, Esq.

24 SUBSCRIBED AND SWORN to before me
this 30th day of October, 2016.

25 _____
26 NOTARY PUBLIC in and for said
27 County and State



1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I.**

3 **SUMMARY OF THE ARGUMENT**

4 As detailed in the Complaint and exhibits attached thereto, as well as in the Dibble
5 Affidavit, Defendants organized and controlled a long functioning fraudulent enterprise where
6 they produced, advertised, and sold fake lithographs. Marco brought suit against Defendants for
7 Deceptive Trade Practice, Violation of Rights of Publicity, Violation of Works of Arts, and
8 Violation of Nevada RICO.

9 Pursuant to NRS 31.020 and NRS 31.022, Marco asks this Court for the issuance of
10 prejudgment writ of attachment against Defendants' real property to which Marco has a legal
11 interest when he presumably succeeds on his claims. A court shall order a writ of attachment
12 without notice when a plaintiff sets forth an affidavit adhering to the statutory requirements, and
13 satisfies one or more grounds for attachment without notice. The Dibble Affidavit attached
14 hereto satisfies all statutory requirements set forth in NRS 31.020. *See generally* **Exhibit 1**.

15 Further, Marco's claim satisfies grounds for attachment without notice. Namely,
16 Defendants demonstrate a pattern and practice of fraud by their operation of numerous fraudulent
17 schemes and enterprises, criminal history, and repetitive name change petitions. As such,
18 Defendants' pattern and practice of fraud creates a substantial likelihood that Defendants will
19 give, assign, pledge, dispose of, or concealed their property, and Marco will be unable to collect
20 the debts due and owing should prejudgment writs not be issued.

21 **II.**

22 **STATEMENT OF RELEVANT FACTS**

23 **A. The Parties Generally**

24 Marco Sassone is a world-renowned artist and painter who created numerous works of
25 visual art ("Works"). *See generally* Complaint, a true and correct copy of which is attached
26 hereto as **Exhibit 2**. Marco's Works were published in an artist monograph book entitled
27 "Sassone," which displayed over one hundred (100) photographs of his Works. *Id.* ¶¶ 13-14.

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Upon information and belief, Defendants Darrell T. Coker and Darrell R. Coker acquired Marco's monograph book, copied Marco's Works from the book, and fraudulently produced the Works. Defendants currently own two (2) known residences in Las Vegas, Nevada: (1) 3380 Camino Gardens Way, Las Vegas, Nevada 89146, and (2) 936 Angel Star, Las Vegas, Nevada 89145.

B. Fraudulent Lithograph Productions

Marco created Works using a number of different mediums such as watercolor, oil paint, and serigraphs. See **Exhibit 2** ¶ 10. While Marco used a number of different mediums to create his Works, Marco has neither produced nor sold any Works in the lithograph medium. *Id.* ¶ 11.

Upon information and belief, once Defendants acquired Marco's monograph book, they imitated the images from the book and produced fraudulent lithographs of Marco's Works with neither permission nor a license. *Id.* ¶ 19. Notably, on each fraudulent lithograph, Defendants imposed Marco's forged signature. *Id.* ¶ 21.

C. The Auction Houses

In order to sell the fraudulent lithographs, Defendants formed a number of sham auction houses that were allegedly operating around the country. *Id.* ¶ 22. The sham auction houses were used as auctioneers to participate in online auction sales at major auction webhosts. Defendants used the auction houses to advertise the fraudulent lithographs for auction as “original signed lithograph by artists Marco Sassone,” or “lithograph after Marco Sassone.” *Id.* ¶ 26. Defendants then sold the fake lithographs through their auction houses thereby profiting to the detriment of Marco. *Id.* ¶ 27.

III.

LEGAL STANDARD

A. This Court has Authority to Order Prejudgment Attachments.

"Attachment proceedings are purely statutory, and recourse to the statutes must be had in ascertaining the rights granted in this state." *Johnson v. Fong*, 62 Nev. 249, 255, 147 P.2d 884, 886 (1944). Under Nevada law,

the plaintiff at the time of issuing the summons, or at any time thereafter, may

1 apply to the court for an order directing the clerk to issue a writ of attachment and
2 thereby cause the property of the defendant to be attached as security for the
3 satisfaction of any judgment that may be recovered, unless the defendant gives
4 security to pay such judgment as provided by this chapter.

4 NRS 31.010.

5 Courts have stated that attachment is a provisional remedy that assists the plaintiff in
6 collecting a money-demand by allowing seizure of property prior to trial and judgment. *See*
7 *Hamilton Beach Brands, Inc. v. Metric & Inch Tools Inc.*, 614 F. Supp. 2d 1056, 1060 (C.D. Cal.
8 2009) (quoting *Kemp Bros. Constr., Inc. v. Titan Elec. Corp.*, 146 Cal. App. 4th 1474, 1476, 53
9 Cal. Rptr. 3d 673 (2007)). The Nevada Supreme Court has found that when the requested relief
10 includes an accounting or payment, the Nevada attachment statutes provide an appropriate and
11 adequate remedy at law. *See Aranoff v. Katleman*, 75 Nev. 424, 433, 345 P.2d 221, 225 (1959).

12 Specifically, NRS 31.017 sets forth the types of cases in which the court may order a writ
13 of attachment without notice to a defendant. Such cases include, but are not limited to, "where a
14 defendant is about to give, assign, hypothecate, pledge, dispose of or conceal the defendant's
15 money or property or any part thereof and the defendant's money or property remaining in this
16 State or that remaining unconcealed will be insufficient to satisfy the plaintiff's claims." *See*
17 NRS 31.017(5). An application for writ of attachment without notice to the defendant must be
18 accompanied by an affidavit of the plaintiff, or any other person having personal knowledge of
19 the facts constituting one or more grounds of attachment, and the affidavit must:

20 a. Set forth clearly the nature of the plaintiff's claim for relief and that the
same is valid.

21 b. Set forth the amount which the affiant believes the plaintiff is entitled to
22 recover from the defendant, and if there is more than one plaintiff or more than
23 one defendant, the amount the affiant believes each plaintiff is entitled to recover
or the amount that the plaintiff is entitled to recover from each defendant.

24 c. Describe in reasonable and clear detail all the facts which show the
25 existence of any one of the grounds for an attachment without notice to the
defendant.

26 d. Describe in reasonable detail the money or property sought to be attached
and the location thereof if known.

27 e. If the property sought to be attached is other than money, set forth to the
28 best knowledge and information of the affiant, the value of such property less any
prior liens or encumbrances.

1 f. Name all third persons upon whom a writ of garnishment in aid of the writ
2 of attachment will be served.

3 g. In an action upon a foreign judgment attach a copy of the judgment to the
4 affidavit for attachment as an exhibit

5 h. State whether, to the best information and belief of the affiant, the money
6 or property sought to be attached is exempt from execution.

7 NRS 31.020.

8 Following the application, the Court shall, without delay, examine the plaintiff's
9 application and affidavit and receive additional evidence if necessary, and shall order the clerk to
10 issue a writ of attachment *without notice* to the defendant if:

- 11 1. The Plaintiff's affidavit, alone or supplemented by additional evidence, meets the
12 requirements of subsection 1 of NRS 31.020; and
- 13 2. The court determines, specifically, that there exists one or more grounds for
14 attachment without notice as indicated in such affidavit or by additional evidence.

15 NRS 31.022.

16 The Dibble Affidavit, supported by additional exhibits, satisfies the requirements set
17 forth in NRS 31.020. *See generally Exhibit 1.* Further, the likelihood that Defendants will
18 transfer and/or hide their assets establishes a ground for attachment without notice exists.
19 Therefore, pursuant to NRS 31.022, Marco is entitled to an order directing the issuance of a
20 prejudgment writ of attachment and garnishment without notice to the Defendants' two (2)
21 properties detailed above. *See id.* ¶ 6.

22 **B. Failure to Attach Real Property Creates a Likelihood that Marco Will Be Unable to
23 Recover on Amounts Due and Owning.**

24 Defendants' history of operating fraudulent enterprises and criminal history suggests that
25 Defendants will give, assign, pledge, dispose of, or conceal their two properties located in
26 Nevada. *See generally Exhibit 2.* For example, Defendant Darrell T. Coker has been convicted
27 of numerous felonies, and recently, was convicted of a similar counterfeit Racketeering and Art
28 Fraud in Leon County, Florida. *See Exhibit 1* ¶ 5. Further, Defendants have repeatedly
petitioned the court for name changes which suggests a possible attempt to conceal assets and/or
defraud creditors. *Id.* Most recently, Darrell T. Coker petitioned to change his name to "Major T.
Davis," and in his petition, he falsely represented to the court that he had never been convicted of

1 a felony—despite his felony Racketeering conviction. *See id.* In the past, Defendants have
2 succeeded in several name change petitions. *See id.* As such, they operate businesses under a
3 variety of different names. *Id.*

4 Currently, Defendants operate a fraudulent scheme facilitated through a network of
5 businesses designed to deprive victims of honest services. *See id.* Specifically, they produce fake
6 lithographs from images in Marco's monograph book and impose Marco's forged signature on
7 the fraudulent lithographs. *See Exhibit 2 ¶¶ 19, 21.* Defendants formed numerous sham limited
8 liability corporations and operate them as auction houses throughout the United States to
9 perpetuate this scheme. *See id.* Indeed, a number of the sham limited liability corporations list
10 Defendants' home addresses—3380 Camino Garden Way, Las Vegas, Nevada 89146—as the
11 corporation's registered address with the Secretary of State. *Id.* Defendants hold out their sham
12 auction houses as legitimate businesses and use the auction houses to participate in online
13 auction sales at major auction webhosts. *Id.* Through their bogus auction houses, Defendants
14 advertise and sell the fake lithographs as purported original Works of Marco. With each sale,
15 Defendants accompany the fraudulent lithographs with a self-produced, counterfeit certificate of
16 authenticity. *See Exhibit 2 ¶ 28.*

17 Defendants' criminal history, several name change petitions, and current fraudulent
18 scheme demonstrate a pattern and practice of fraud and utter disregard of the law in both
19 criminal and non-criminal proceedings. Defendants' pattern and practice of fraud support the
20 notion that Defendants will likely give, assign, pledge, dispose of, or conceal their money or
21 property. Therefore, it is necessary for this Court to issue prejudgment writs of attachment to
22 Defendants' two properties—(1) 3380 Camino Gardens Way, Las Vegas, Nevada 89146, and (2)
23 936 Angel Star Lane, Las Vegas, Nevada 89145—to preserve Marco's legal right to be able to
24 collect on debts due and owing.

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1 IV.

2 CONCLUSION

3 Plaintiff Marco Sassone has set forth in detail the statutorily-required elements for a
4 prejudgment writ of attachment to issue without notice. Those requirements, as set forth in NRS
5 31.020, have been met by this Application, the attached Dibble affidavit and exhibits. Therefore,
6 it is respectfully requested that this Court issue prejudgment writs of attachment on certain
7 identified real property.

8 Dated this 24 day of October, 2016.

9 GENTILE CRISTALIN
10 MILLER ARMENI SAVARESE
11 

12 DOMINIC P. GENTILE
13 Nevada Bar No. 1923
14 410 S. Rampart Blvd., Suite 420
15 Las Vegas, NV 89145
16 Telephone (702) 880-0000
17 Attorneys for Plaintiff Marco Sassone
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EXHIBIT 1

EXHIBIT 1

1 GENTILE CRISTALLI
2 MILLER ARMENI SAVARESE
3 DOMINIC P. GENTILE
4 Nevada Bar No. 1923
5 Email: dgentile@gemaslaw.com
6 410 S. Rampart Blvd., Suite 420
7 Las Vegas, NV 89145
8 Telephone (702) 880-0000
9 Facsimile (702) 778-9709
10 Attorneys for Plaintiff Marco Sassone

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EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA

MARCO SASSONE,

Plaintiff,

vs.

DARRELL T. COKER an individual,
DARRELL R. COKER, an individual,
RICHARD MORELLO an individual,
DARRYL MCCULLOUGH an individual,
AND THE JELLO'S JIGGLIN, LLC d/b/a
Postal Annex, DOES 1-10, and ROE
ENTITIES 1-10, inclusive,

Defendants.

CASE NO. A-16-741516-B
DEPT. XXVII

**AFFIDAVIT OF DONALD R. DIBBLE IN
SUPPORT OF APPLICATION FOR A
PREJUDGMENT WRIT OF
ATTACHMENT WITHOUT NOTICE**

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

I, Donald R. Dibble, being first duly sworn on oath, deposes and says:

1. I am over the age of 18 years old and I am competent to testify to the matters asserted herein, of which I have personal knowledge, except as to those matters stated upon information and belief. As to those matters stated upon information and belief, I believe them to be true.

2. I am an investigator employed by the Law Office of Gentile Cristalli Miller Armeni Savarese in Las Vegas, Nevada assigned to assist in the preparation of Case No. A-16-

1 742853-C. Included in that assignment was direction to gather information to establish Marco
2 Sassone's valid claims for Deceptive Trade Practice, Violation of Right of Publicity, Violation of
3 Works of Art, and Violation of Nevada Civil RICO against all named Defendants. See
4 Complaint, filed September 2, 2016, already on file herein.

5 3. Marco Sassone is entitled to recover from Defendants in the following amounts:

6 a. Darrell T. Coker: an amount in excess of any anticipated profit proceeds
7 arising from a sale of known real property.

8 b. Darrell R. Coker: an amount in excess of any anticipated profit proceeds
9 arising from a sale of known real property.

10 4. Attached to the instant Application for Prejudgment Writ of Attachment Without
11 Notice, are **Exhibits A-J**.

12 5. Upon information and belief, Defendant is about to give, assign, pledge, dispose
13 of or conceal his money or property or any part thereof based on the following:

14 a. The present action arises from a long functioning fraudulent enterprise
15 organized and controlled by Darrell T. Coker and his son, Darrell R. Coker,
16 who oversee a network of individuals and business entities designed to
17 deprive innocent victims of honest services, and perpetrated in such a way as
18 to result in significant financial benefit to the Cokers and financial harm to
19 the victims.

20 b. Darrell T. Coker is a sixty-six (66) year old career criminal who has engaged
21 in a pattern of establishing online auction sites to sell counterfeit pieces of art
22 while fraudulently advertising those artworks to be the authentic work of
23 named artists. Such production and sale of the art results in a significant loss
24 of rightful income to the artists whose work is being counterfeited. Among
25 the many artists who are victims of this scheme is the plaintiff in this
26 action—Marco Sassone. At this time, the total number of artists who are
27 victims of this fraud are not known but believed to be in the dozens.

28 c. In the case of Marco Sassone alone, unauthorized and counterfeit copies of

1 his work has been offered for sale no less than one thousand (1,000) times. It
2 is anticipated that the total established number will be much higher. As a
3 result, there will be a provable loss of tens, if not hundreds, of thousands of
4 dollars.

5 d. The operation of the Cokers' fraudulent scheme is facilitated through a
6 network of businesses which are centered at and controlled from the Cokers'
7 home of record located at 3380 Camino Gardens Way, Las Vegas, Nevada
8 89146. See Clark County Assessor Recorder, a true and correct copy of which
9 is attached hereto as **Exhibit A**. In addition to being the operational center of
10 the Cokers' scheme, the home is also the address the Cokers registered the
11 corporations and LLCs through which he operates his fraudulent enterprise.
12 See Nevada Secretary of State, a true and correct copy of which is attached
13 hereto as **Exhibit B**. All other known addresses associated with this scheme
14 are locations through which the counterfeit and fraudulent work is
15 transferred. However, the primary location of the operation of this fraudulent
16 activity is at the Camino Gardens Way property.

17 e. The Camino Gardens Way property is a single-family home situated on a
18 large lot. Aerial photographs of the property establish that the large portion
19 of the north side of the property is being used for commercial purposes. In
20 this isolated area is at least one storage shed along with a number of enclosed
21 trailers, a large commercial sized enclosed truck similar to a moving van, a
22 smaller pickup truck and other passenger vehicles. The nature and amount of
23 equipment and facilities in this cordoned off area is clearly sufficient to
24 conduct the illicit operation alleged in this case. See Photographs of Camino
25 Gardens Way, a true and correct copy of which is attached hereto as **Exhibit**
26 **C**.

27 f. The nature of the overall fraudulent scheme is such that the management and
28 sales operations can be accomplished by anyone using a computer from any

1 location while leading unsuspecting buyers to believe that they are
2 communicating with persons at the advertised site in other states. Our
3 investigation to date demonstrates that the remote auction sites do not exist
4 beyond being a mere mailing address. Further, telephone numbers associated
5 with at least some of the sites have been determined to be cell phones.

6 g. The totality of information gained during our investigation demonstrates that
7 the entire fraudulent enterprise is conducted from the Camino Gardens Way
8 property with the likelihood that computer and cell phone activity can be
9 accomplished from anywhere.

10 h. A second property is located at 936 Angel Star Land, Las Vegas, Nevada
11 89145. That small condominium is also owned by one of the Cokers. See
12 Clark County Assessor Recorder, a true and correct copy which is attached
13 hereto as **Exhibit D**. Upon information and belief, the home is presently
14 occupied by Jamie and Maria Agudelo. Jamie Agudelo is the operator of one
15 of Coker's auctions sites known as BuyArtAuction.com which is established
16 in name only in Oklahoma City, Oklahoma. See LexisNexis Business Report,
17 a true and correct copy of which is attached hereto as **Exhibit E**. There are
18 many auction "sites" established by Coker in various states other than
19 Nevada. Upon belief, these business entities do not physically exist beyond
20 being chartered by the various states at those addresses. The full scope of the
21 actual activity is here in Las Vegas, Nevada and conducted over the internet.
22 The presence of the Agudelos at the Cokers' Angel Star Lane condo suggests
23 that the property may be a reward for their participation of the fraud and it is
24 expected that it may also be an operational site of the fraudulent scheme.

25 i. As stated, Darrell T. Coker is a career criminal who has suffered a number of
26 felony convictions over the course of his life. He settled in Las Vegas
27 following his release from the Florida State Prison where he had spent four
28 (4) years of incarceration following a conviction for Racketeering, Art

1 Fraud, and Tax crimes. See Florida Department of Corrections Records, a
2 true and correct copy of which is attached hereto as Exhibit F. Prior to that
3 conviction he suffered a long series of arrests and convictions beginning in
4 1968 and continuing through February of 1992. His record includes Robbery,
5 Fraud, Assault, Aggravated Assault, Aggravated Battery, Aiding and Abet
6 Escape, and Possession of Weapons. See Florida Department of Law
7 Enforcement, a true and correct copy of which is attached hereto as Exhibit
8 G.

9 j. Coker has also initiated a series of frivolous civil actions designed to dissuade
10 and confound persons with whom he has had business relationships or
11 personal vendettas. The most recent such actions were filed in the state and
12 federal courts here in Nevada.

13 k. He has also filed for Bankruptcy in the Middle District of Florida in an
14 attempt to avoid payment of legal debt while in prison. Following his release
15 from prison, he brought yet another Bankruptcy case against the United
16 States in an attempt to avoid tax debt.

17 l. During the pendency of the bankruptcy cases Darrell T. Coker relocated to
18 Clark County from Florida and acquired a residence for a reported purchase
19 price of \$900,000.

20 m. In total, the Cokers have repeatedly demonstrated that they have no regard for
21 the law, the courts, or their legal and financial obligations.

22 n. Darrell T. Coker has demonstrated his disregard and contempt for the courts
23 here in Clark County in the form of a perjured petition for name change in
24 which he asserted that he had "never been convicted of a felony" and that the
25 petition was "not made to defraud creditors or some other fraudulent reason."
26 Our investigation has determined that both Darrell T. Coker and Darrell R.
27 Coker have received name changes through petition and that the newly
28 acquired names were in fact used to perpetuate the exact fraudulent activity

1 that gives rise to this case. *See* Eighth Judicial District Records, a true and
2 correct copy of which is attached hereto as **Exhibits H-J**.

3 o. The full use of the fraudulently established names and identities remains
4 under investigation; however, it is known that they are being fraudulently
5 used conceal their true identities in business matters. Such actions are also a
6 common scheme through which assets are concealed so as to frustrate the
7 collection of legal, binding debt.

8 p. The Cokers have been defendants in a series of legal actions filed by their
9 victims. Those actions have been filed in state and federal courts across the
10 country. The Cokers have avoided payment of their ill-gotten proceed
11 through any number of means. I have no record of anyone successfully
12 collecting what they are due.

13 q. I am aware that customers have made repeated complaints about the products
14 sold by the Coker enterprise in attempts to recover their loss and that he has
15 employed a host of techniques to avoid payment of legitimate claims.

16 r. The final result of this office's ten (10) month investigation is the Cokers
17 have, for many years, operated a profitable fraudulent enterprise through a
18 pattern of fraud and chicanery and, in so doing, have avoided not only
19 consequence for their action, but also payment to victims who have brought
20 forth legitimate claims. The total investigation makes it clear that, over their
21 lifetime of fraudulent and criminal activity, the Cokers have developed the
22 tools, skills, knowledge, and techniques that permit them to conceal financial
23 resources and avoid payment of debt and obligations.

24 s. Based on the volume of actionable activity that will be presented during the
25 matter at hand, it is anticipated that both Darrell T. and Darrell R. Coker will
26 be exposed to significant financial obligations. Their fraudulent and
27 deceptive behavior would clearly lead a reasonable person to anticipate that
28 they will employ the fraud and dodges that have served him well over the

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years to avoid satisfying their obligations to Marco Sassone.

6. I am aware of real property owned by the following Defendants, and to my best knowledge and information, the values of such property as follows:

- a. 3380 Camino Gardens Way, Las Vegas, Nevada 89146: valued around \$500,000 - \$600,000.
- b. 936 Angel Star Lane, Las Vegas, Nevada 89145: valued around \$150,000 - \$175,000.

7. I am not aware of any prior current liens on the properties listed in paragraph 6. I am aware that that past liens and similar filings have been placed against the Camino Gardens Way property, however, those actions appear to have been satisfied. I am not aware of any encumbrances in the form of mortgage loans at this time on Defendants' properties listed in paragraph 6 however a commissioned title search is anticipated as part of this investigation.

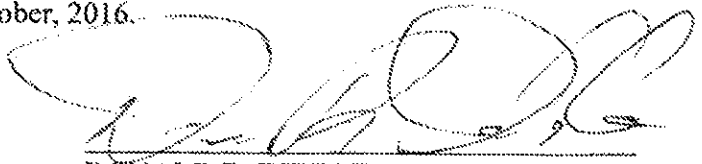
8. This is not an action upon a foreign judgment; therefore, a copy of such a judgment is not attached hereto.

9. Upon information and belief, the properties listed in paragraph 6, above, are not exempt from execution under Nevada Law.

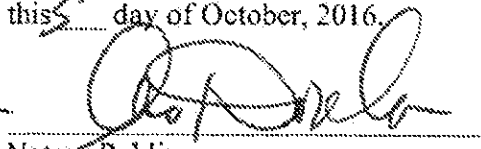
10. Upon information and belief, there exists a danger that Defendants could transfer and/or hide their assets.

Further Affiant Sayeth Not.

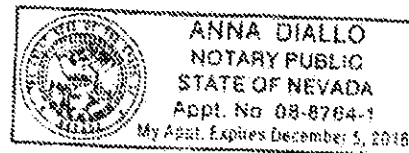
Executed this 3rd day of October, 2016.


DONALD R. DIBBLE

Subscribed to and sworn before me
this 3rd day of October, 2016.



Notary Public
My Commission Expires On:



EXHIBIT

A

GENERAL INFORMATION	
PARCEL NO.	163-14-513-005
OWNER AND MAILING ADDRESS	COKER DARRELL 3380 CAMINO GARDENS WY LAS VEGAS NV 89146-6617
LOCATION ADDRESS/CITY/UNINCORPORATED TOWN	3380 CAMINO GARDENS WAY SPRING VALLEY
ASSESSOR DESCRIPTION	ELCAMINO GARDENS PLAT BOOK 30 PAGE 54 LOT 5
RECORDED DOCUMENT NO.	* 20050922-02110
RECORDED DATE	Sep 22 2005
VESTING	NS
COMMENTS	

*Note: Only documents from September 15, 1999 through present are available for viewing.

ASSESSMENT INFORMATION AND SUPPLEMENTAL VALUE	
TAX DISTRICT	417
APPRAISAL YEAR	2015
FISCAL YEAR	2016-17
SUPPLEMENTAL IMPROVEMENT VALUE	0
SUPPLEMENTAL IMPROVEMENT ACCOUNT NUMBER	N/A

REAL PROPERTY ASSESSED VALUE		
FISCAL YEAR	2015-16	2016-17
LAND	28000	31500
IMPROVEMENTS	143405	142742
PERSONAL PROPERTY	0	0
EXEMPT	0	0
GROSS ASSESSED (SUBTOTAL)	171405	174242
TAXABLE LAND+IMP (SUBTOTAL)	489729	497834
COMMON ELEMENT ALLOCATION ASSD	0	0
TOTAL ASSESSED VALUE	171405	174242
TOTAL TAXABLE VALUE	489729	497834

[Click here for Treasurer Information regarding real property taxes.](#)

[Click here for Flood Control Information.](#)

ESTIMATED LOT SIZE AND APPRAISAL INFORMATION

ESTIMATED SIZE	0.52 Acres
ORIGINAL CONST. YEAR	1985
LAST SALE PRICE MONTH/YEAR	900000 9/2005
LAND USE	110 - Single Family Residence
DWELLING UNITS	1

PRIMARY RESIDENTIAL STRUCTURE

1ST FLOOR SQ. FT.	3121	CASITA SQ. FT.	0	ADDN/CONV	
2ND FLOOR SQ. FT.	1265	CARPORT SQ. FT.	0	POOL	YES
3RD FLOOR SQ. FT.	0	STYLE	Two Story	SPA	NO
UNFINISHED BASEMENT SQ. FT.	0	BEDROOMS	5	TYPE OF CONSTRUCTION	Frame-Stucco
FINISHED BASEMENT SQ. FT.	0	BATHROOMS	3 FULL / 1 HALF	ROOF TYPE	Concrete Tile
BASEMENT GARAGE SQ. FT.	0	FIREPLACE	2		
TOTAL GARAGE SQ. FT.	928				

ASSESSORMAP VIEWING GUIDELINES

MAP	163145
	<p>In order to view the Assessor map you must have Adobe Reader installed on your computer system.</p> <p>If you do not have the Reader it can be downloaded from the Adobe site by clicking the following button. Once you have downloaded and installed the Reader from the Adobe site, it is not necessary to perform the download a second time to access the maps.</p>

NOTE: THIS RECORD IS FOR ASSESSMENT USE ONLY. NO LIABILITY IS ASSUMED

20050922-0002110

APN: 163-14-513-005
Affix R.P.T.T. \$4,590.00
ESCROW NO. 14052698-KM
WHEN RECORDED MAIL DEED AND TAX
STATEMENTS TO:

Darrell Coker
3380 Camino Colorado Way
LOS VEGAS, NV 89146

Fee: \$16.00 RPTT: \$4,590.00
N/C Fee: \$0.00

09/22/2005 10:19:15
T20050174246

Requestor:
LAND TITLE OF NEVADA

Frances Deane JBR
Clark County Recorder Pgs: 3

GRANT, BARGAIN, SALE DEED

THIS INDENTURE WITNESSETH: That: Michael H. Conley and Michele K. Conley Trustees of the Conley Family Trust Dated January 7, 2002, for valuable consideration, receipt of which is hereby acknowledged, hereby Grant, Bargain, Sell and Convey to Darrell Coker an unmarried man

all that real property situate in the County of Clark, State of Nevada, bounded and described as follows:

SEE EXHIBIT "A" ATTACHED HERETO AND MADE A PART HEREOF

SUBJECT
TO:

1. Taxes for the current fiscal year, and any and all taxes (including supplemental taxes) and assessments levied or assessed after the recording date of this document.
2. Rights of way, reservations, restrictions, easements and conditions of record.

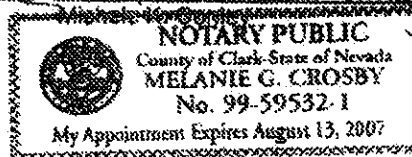
First Deed of Trust to record concurrently herewith.

Together with all and singular the tenements, hereditaments, and appurtenances thereunto belonging or in anywise appertaining.

Witness my/our hand(s) this 9 day of September, 2005.

Michael H. Conley Trustee Michele K. Conley Trustee
Michael H. Conley, trustee Michele K. Conley, trustee

STATE OF NEVADA
COUNTY OF CLARK



On, 9-19-05, personally appeared before me, a Notary Public, Michael H. Conley and Michele K. Conley Trustees of the Conley Family Trust Dated January 7, 2002, personally known (or proven) to me to be the person(s) whose name(s) is/are subscribed to the within instrument who acknowledged that he/she/they executed the instrument.

Melanie G. Crosby
Notary Public in and for said County and State.

14052698-KM

EXHIBIT "A"
Legal Description

LOT FIVE (5) OF EL CAMINO GARDENS, AS SHOWN BY MAP THEREOF ON FILE IN BOOK
30 OF PLATS, PAGE 54, IN THE OFFICE OF THE COUNTY RECORDER OF CLARK COUNTY,
NEVADA.

APN: 163-14-513-005

STATE OF NEVADA
DECLARATION OF VALUE FORM

1. Assessor's Parcel Number(s)

a) 163-14-513-005

b)

c)

d)

2. Type of Property:

a) ☐ Vacant Land

c) ☐ Condo/Twnhse

e) ☐ Apt. Bldg

g) ☐ Agricultural

☐ Other

b) ☒ Single Fam. Res.

d) ☐ 2-4 Plex

f) ☐ Comm'l/Ind'l

h) ☐ Mobile Home

FOR RECORDER'S OPTIONAL USE
ONLY

Book: _____

Page: _____

Date of Recording: _____

Notes: _____

3. Total Value/Sales Price of Property

\$900,000.00

Deed in Lieu of Foreclosure Only (value of property)

\$

Transfer Tax Value:

\$900,000.00

Real Property Transfer Tax Due

\$4,590.00

4. If Exemption Claimed:

a. Transfer Tax Exemption per NRS 375.090, Section

b. Explain Reason for Exemption:

5. Partial Interest: Percentage being transferred: %

The undersigned declares and acknowledges under penalty of perjury, pursuant to NRS 375.060 and NRS 375.110, that the information provided is correct to the best of their information and belief, and can be supported by documentation if called upon to substantiate the information provided herein. Furthermore, the parties agree that disallowance of any claimed exemption, or other determination of additional tax due, may result in a penalty of 10% of the tax due plus interest at 1% per month. Pursuant to NRS 375.030, the Buyer and Seller shall be jointly and severally liable for any additional amount owed.

Signature: _____

Capacity: Seller/Grantor

Signature: _____

Capacity: Buyer/Grantee

SELLER (GRANTOR) INFORMATION

(Required)

Print Name: Michael H. Conley

Address: 4107 Sherman Oaks

City: Las Vegas

State: NV 89129

BUYER (GRANTEE) INFORMATION

(Required)

Print Name: Darrell Coker

Address: 3380 Camino Gardens

City: Las Vegas

State: NV 89146

COMPANY/PERSON REQUESTING RECORDING (required if not seller or buyer)

Print Name: LAND TITLE OF NEVADA, INC.

Escrow #: 14052698-KM

Address: 720 S Seventh Street

City: Las Vegas, Nevada 89101

AN ADDITIONAL RECORDING FEE OF \$1.00 WILL APPLY FOR EACH DECLARATION OF
VALUE FORM PRESENTED TO CLARK COUNTY, EFFECTIVE JUNE 1, 2004

2110

EXHIBIT

B

ART & JEWELRY HOUSE LLC.

Business Entity Information

Status:	Active	File Date:	12/17/2012
Type:	Domestic Limited-Liability Company	Entity Number:	E0844602012-8
Qualifying State:	NV	List of Officers Due:	12/31/2016
Managed By:	Managers	Expiration Date:	
NV Business ID:	NV20121749574	Business License Exp:	12/31/2016

Additional Information

Central Index Key:	
--------------------	--

Registered Agent Information

Name:	DARRELL T. COKER SR	Address 1:	3380 CAMINO GARDEN WAY LAS VEGAS
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89146
Phone:		Fax:	
Mailing Address 1:	3380 CAMINO GARDEN WAY LAS VEGAS	Mailing Address 2:	
Mailing City:	LAS VEGAS	Mailing State:	NV
Mailing Zip Code:	89146		
Agent Type:	Noncommercial Registered Agent		

Financial Information

No Par Share Count:	0	Capital Amount:	\$ 0
No stock records found for this company			

Officers

☐ Include Inactive Officers

Manager - DARRELL T COKER SR.

Address 1:	3380 CAMINO GARDEN WAY LAS VEGAS	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89146	Country:	USA
Status:	Active	Email:	

Actions/Amendments

Action Type:	Articles of Organization	SASS000026
--------------	--------------------------	------------

Document Number:	20120846057-65	# of Pages:	1
File Date:	12/17/2012	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		
Document Number:	20120846058-76	# of Pages:	1
File Date:	12/17/2012	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20130793279-33	# of Pages:	1
File Date:	12/4/2013	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20140712452-68	# of Pages:	1
File Date:	10/13/2014	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20150453051-36	# of Pages:	1
File Date:	10/13/2015	Effective Date:	
(No notes for this action)			

DARRELL COKER INC

Business Entity Information

Status:	Revoked	File Date:	6/14/2006
Type:	Domestic Corporation	Entity Number:	E0443772006-6
Qualifying State:	NV	List of Officers Due:	6/30/2011
Managed By:		Expiration Date:	
NV Business ID:	NV20061070368	Business License Exp:	6/30/2011

Registered Agent Information

Name:	DARRELL COKER	Address 1:	3395 S JONES STE 351
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89146
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	
Mailing Zip Code:			
Agent Type:	Noncommercial Registered Agent		

Financial Information

No Par Share Count:	2,500.00	Capital Amount:	\$ 0
No stock records found for this company			

Officers

☐ Include Inactive Officers

President - DARRELL COKER

Address 1:	3380 CAMINO GARDEN WAY	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89146	Country:	
Status:	Active	Email:	

Secretary - DARRELL COKER

Address 1:	3380 CAMINO GARDEN WAY	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89146	Country:	
Status:	Active	Email:	

Insurance - DARRELL COKER

Address 1:	3380 CAMINO GARDEN WAY	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89146	Country:	
Status:	Active	Email:	

SASS000028

Director - DARRELL COKER			
Address 1:	3380 CAMINO GARDEN WAY	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89146	Country:	
Status:	Active	Email:	

Actions\Amendments			
Action Type:	Articles of Incorporation		
Document Number:	20060378078-51	# of Pages:	2
File Date:	6/14/2006	Effective Date:	
Initial Stock Value: No Par Value Shares: 2,500 ----- Total Authorized Capital: \$ 0.00			
Action Type:	Initial List		
Document Number:	20060615099-48	# of Pages:	1
File Date:	9/25/2006	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20070276890-51	# of Pages:	1
File Date:	4/19/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20080250680-91	# of Pages:	1
File Date:	4/10/2008	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20090788377-21	# of Pages:	1
File Date:	11/11/2009	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20100531660-64	# of Pages:	1
File Date:	7/19/2010	Effective Date:	
(No notes for this action)			

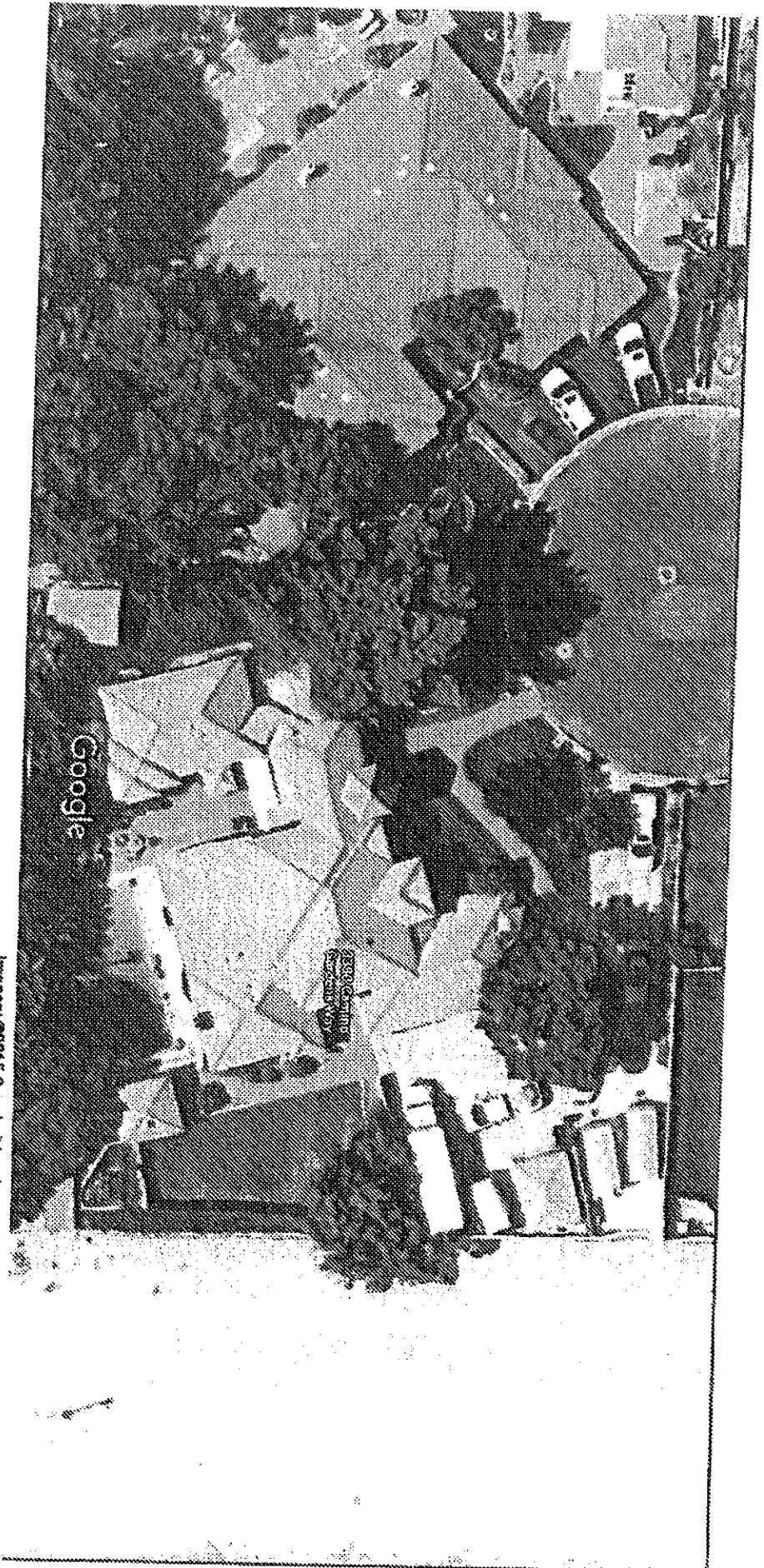
EXHIBIT

C



5A550003

Google Maps 3380 Camino Gardens Way



Imagery ©2015 Google, Map data ©2015 Google 20 ft

EXHIBIT

D

Michele W. Shafe, Assessor

REAL PROPERTY PARCEL RECORD

[Click Here for a Print Friendly Version](#)

Assessor Map	Aerial View	Building Sketch	Ownership History	Neighborhood Sales	New Search
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GENERAL INFORMATION	
PARCEL NO.	138-33-414-061
OWNER AND MAILING ADDRESS	COKER DARRELL 3380 CAMINO GARDENS WAY LAS VEGAS NV 89146
LOCATION ADDRESSCITY/UNINCORPORATED TOWN	936 ANGEL STAR LN LAS VEGAS
ASSESSOR DESCRIPTION	STARFIRE EST 3 PLAT BOOK 67 PAGE 85 LOT 61 BLDG 9
RECORDED DOCUMENT NO.	* 20141126:03516
RECORDED DATE	Nov 26 2014
VESTING	NS
COMMENTS	

*Note: Only documents from September 15, 1999 through present are available for viewing.

ASSESSMENT INFORMATION AND SUPPLEMENTAL VALUE	
TAX DISTRICT	200
APPRAISAL YEAR	2015
FISCAL YEAR	2016-17
SUPPLEMENTAL IMPROVEMENT VALUE	0
SUPPLEMENTAL IMPROVEMENT ACCOUNT NUMBER	N/A

REAL PROPERTY ASSESSED VALUE		
FISCAL YEAR	2015-16	2016-17
LAND	7700	9100
IMPROVEMENTS	32710	32397
PERSONAL PROPERTY	0	0
EXEMPT	0	0
GROSS ASSESSED (SUBTOTAL)	40410	41497
TAXABLE LAND+IMP (SUBTOTAL)	115457	118563
COMMON ELEMENT ALLOCATION ASSED	779	778
TOTAL ASSESSED VALUE	41189	42275

TOTAL TAXABLE VALUE

117683

120765

[Click here for Treasurer Information regarding real property taxes.](#)

[Click here for Flood Control Information.](#)

ESTIMATED LOT SIZE AND APPRAISAL INFORMATION	
ESTIMATED SIZE	0.03 Acres
ORIGINAL CONST. YEAR	1996
LAST SALE PRICE MONTH/YEAR	147000 11/2014
LAND USE	160 - Townhouses
DWELLING UNITS	1

PRIMARY RESIDENTIAL STRUCTURE					
1ST FLOOR SQ. FT.	660	CASITA SQ. FT.	0	ADDN/CONV	
2ND FLOOR SQ. FT.	748	CARPORT SQ. FT.	0	POOL	NO
3RD FLOOR SQ. FT.	0	STYLE	Townhome/2 Story Attached	SPA	NO
UNFINISHED BASEMENT SQ. FT.	0	BEDROOMS	3	TYPE OF CONSTRUCTION	Frame-Stucco
FINISHED BASEMENT SQ. FT.	0	BATHROOMS	2 FULL / 1 HALF	ROOF TYPE	Concrete Tile
BASEMENT GARAGE SQ. FT.	0	FIREPLACE	1		
TOTAL GARAGE SQ. FT.	240				

ASSESSORMAP VIEWING GUIDELINES	
MAP	138334
<p>In order to view the Assessor map you must have Adobe Reader installed on your computer system.</p> <p>If you do not have the Reader it can be downloaded from the Adobe site by clicking the following button. Once you have downloaded and installed the Reader from the Adobe site, it is not necessary to perform the download a second time to access the maps.</p>	

NOTE: THIS RECORD IS FOR ASSESSMENT USE ONLY. NO LIABILITY IS ASSUMED

Inst #: 20141126-0003516

Fees: \$19.00 N/C Fee: \$0.00

RPTT: \$749.70 Ex: #

11/26/2014 02:40:48 PM

Receipt #: 2234192

Requestor:

DRIGGS TITLE AGENCY INC.

Recorded By: CYV Pgs: 4

DEBBIE CONWAY

CLARK COUNTY RECORDER

APN: 138-33-414-061

RECORDING REQUESTED BY
DRIGGS TITLE AGENCY, INC.
WHEN RECORDED RETURN TO AND
MAIL TAX BILL TO:

Darrell Coker

3380 Camino Gardens Way

Las Vegas, NV 89146

Escrow No. 14-11-104237JG

GRANT, BARGAIN, SALE DEED

THIS INDENTURE WITNESSETH:

That John Masso, an unmarried man, FOR A VALUABLE CONSIDERATION, the receipt of which is hereby acknowledged, does hereby Grant, Bargain, Sell and Convey to Darrell Coker, an unmarried man, all that real property situate in the County of Clark, State of Nevada, bounded and described as follows:

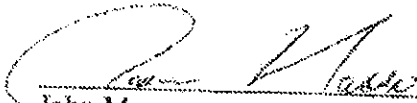
SEE EXHIBIT "A" ATTACHED HERETO AND BY REFERENCE MADE A PART HEREOF
FOR LEGAL DESCRIPTION.

SUBJECT TO:

1. Taxes paid current, rights of way, reservations, restrictions, easements and conditions of record.

Together with all and singular the tenements, hereditaments and appurtenances thereunto belonging or in anywise appertaining.

WITNESS my hand this 14 day of November, 2014.

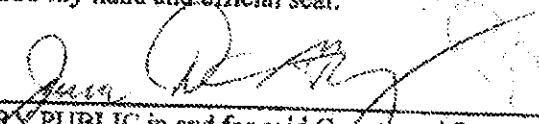

John Masso

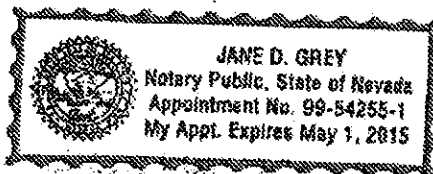
STATE OF NEVADA

COUNTY OF CLARK

On this 25 day of Nov, 2014, personally appeared before me, a Notary Public in and for said County and State, John Masso, who acknowledged that he executed the above instrument.

WITNESS my hand and official seal.


NOTARY PUBLIC in and for said County and State.



Escrow No.: 14-11-104237JG

APN: 138-33-414-061

Exhibit "A"

Parcel One (1):

Unit Sixty-One (61) in Building "S" of STARFIRE ESTATES III, a Townhome Subdivision, as shown by map thereof on file in Book 67 of Plats, Page 85, in the Office of the County Recorder of Clark County, Nevada.

Parcel Two (2):

A non-exclusive easement over and across all those areas as shown on the subdivision map referred to in Parcel 1 above, designated as Common Elements and more fully defined in those certain Covenant, Conditions, and Restrictions recorded August 2, 1995 in Book 950802, as Document No. 01304.

STATE OF NEVADA DECLARATION OF VALUE

1. Assessor Parcel Number(s):

- a) 138-33-414-061
- b) _____
- c) _____
- d) _____

FOR RECORDERS OPTIONAL USE ONLY

Book: _____ Page: _____

Date of Recording: _____

Notes: _____

2. Type of Property:

- a) ☐ Vacant Land
- b) ☒ Single Family Residence
- c) ☐ Condo/Townhouse
- d) ☐ 2-4 Plex
- e) ☐ Apartment Building
- f) ☐ Commercial/Industrial
- g) ☐ Agricultural
- h) ☐ Mobile Home
- i) ☐ Other

3. a) Total Value/Sales Price of Property:

\$ 147,000.00

b) Deed in Lieu of Foreclosure Only (value of property)

\$.00

c) Transfer Tax Value:

\$ 147,000.00

d) Real Property Transfer Tax Due:

\$ 749.70

4. If Exemption Claimed:

a) Transfer Tax Exemption, per NRS 375.090, Section: _____

b) Explain Reason for Exemption: _____

5. Partial Interest: Percentage being transferred: 100%

The undersigned declares and acknowledges, under penalty of perjury, pursuant to NRS 375.060 and NRS 375.110, that the information provided is correct to the best of their information and belief, and can be supported by documentation if called upon to substantiate the information provided herein. Furthermore, the parties agree that disallowance of any claimed exemption, or other determination of additional tax due, may result in a penalty of 10% of the tax due plus interest at 1% per month. Pursuant to NRS 375.030, the Buyer and Seller shall be jointly and severally liable for any additional amount owed.

Signature: _____ Capacity: Grantor

Signature: _____ Capacity: Grantee

SELLER (GRANTOR) INFORMATION

Print Name: John Masso

Address: 8635 W. Sahara Ave. #60

City: Las Vegas

State: NV Zip: 89117

BUYER (GRANTEE) INFORMATION

Print Name: Darrell Coker

Address: 3380 Camino Gardens Way

City: Las Vegas

State: NV Zip: 89146

COMPANY/PERSON REQUESTING RECORDING

Driggs Title Agency, Inc.

7900 West Sahara Avenue, Suite 150

Las Vegas, NV 89117-7920

Escrow No. 14-11-104237JG

Escrow Officer Jane Grey

AS A PUBLIC RECORD THIS FORM MAY BE RECORDED/MICROFILMED

EXHIBIT

E

Important: The Public Records and commercially available data sources used on reports have errors. Data is sometimes entered poorly, processed incorrectly and is generally not free from defect. This system should not be relied upon as definitively accurate. Before relying on any data this system supplies, it should be independently verified. For Secretary of State documents, the following data is for information purposes only and is not an official record. Certified copies may be obtained from that individual state's Department of State. The criminal record data in this product or service may include records that have been expunged, sealed, or otherwise have become inaccessible to the public since the date on which the data was last updated or collected.

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Your DPPA Permissible Use: Licensed Private Investigative or Security Services

Your GLBA Permissible Use: Legal Compliance

Your DMF Permissible Use: Legitimate Business Purpose Pursuant to a Law, Government Rule, Regulation, or Fiduciary Duty

Comprehensive Business Report

Date: 12/28/15

Company Name: BUY ART AUCTIONS INC

Address: 324 ROBINSON AVE, OKLAHOMA CITY OK 73102-6417

Name Variations:

Company Name: BUY ART AUCTIONS INC

TIN Variations:

[None Found]

Parent Company:

[None Found]

Comprehensive Business Report Summary: (Click on Link to see detail)

Industry Information:

None Found

Bankruptcies:

None Found

Liens and Judgments:

None Found

Corporation Filings:

None Found

Registered Agents:

None Found

Business Registration:

1 Found

UCC Filings for Business:

None Found

Associated Businesses:

None Found

Connected Businesses:

1 Found

Business Contacts:

1 Found

Executives:

None Found

Motor Vehicles:

None Found

Properties:

None Found

FAA Aircrafts:

None Found

Watercrafts:

None Found

Dun & Bradstreet:
0 Found

⊖ Business Filings:

Industry Information:
[None Found]

Bankruptcies:
[None Found]

Liens & Judgments:
[None Found]

Corporation Filings:
[None Found]

Registered Agents:
[None Found]

Business Registration:

Name: BUY ART AUCTIONS INC
Address: 324 N ROBINSON AVE STE 100, OKLAHOMA CITY OK 73102-6417
Filing Number: 1912476412
Status: Active
Corporation Code: Secretary of State
Filing Date: 09/10/2014

UCC Filings for Business:
[None Found]

Associated Businesses:
[None Found]

Connected Businesses:

Name: BUY ART AUCTIONS, INC.
Address: 620 CEDAR ST, PERRY OK 73077-6643

⊖ Associated People:

Business Contacts:

Current Individuals:

Name: JAIME AGUDELO
Contact Title - CONTACT
Address: 324 N ROBINSON AVE STE 100, OKLAHOMA CITY OK 73102-6417
Date Last Seen: 09/10/2014

Prior Individuals:
[None Found]

Executives:

Current Executives:
[None Found]

Prior Executives:
[None Found]

⊖ Assets:

Motor Vehicles:
[None Found]

Properties:
[None Found]

FAA Aircrafts:
Current Aircraft(s):
[None Found]

Prior Aircraft(s):
[None Found]

Watercrafts:

Current Watercrafts:

[None Found]

Prior Watercrafts:

[None Found]

This portion of the report contains information from Dun & Bradstreet, Inc.
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Business Information from Dun & Bradstreet:
[None Found]

EXHIBIT

F



Corrections Offender Network

Inmate Release Information Detail

(This information was current as of 4/26/2004)



DC Number: 022412
Name: COKER, DARRELL T
Race: WHITE
Sex: MALE
Hair Color: BROWN
Eye Color: BROWN
Height: 5'00"
Weight: 196 lbs.
Birth Date: 08/04/1949
Custody: MEDIUM
Release Date: 04/26/2004

Stated Residence Upon Release:

2 AKLAND AVE. (P.O. 454)
Orlando, FL 32764 32764

Aliases:

DARRELL COKER DARRELL T COKER
DARRELL TYRONE COKER

Current Prison Sentence History:

Offense Date	Offense	Sentence Date	County	Case No.	Prison Sentence Length
10/24/1993	ACQUIRE PROP. F/RACKETEERING	02/04/2000	LEON	9701914	5Y 0M 0D

Note: The offense descriptions are truncated and do not necessarily reflect the crime of conviction. Please refer to the court documents or the Florida Statutes for further information or definition.

Incarceration History:

Date In-Custody	Date Out-of-Custody
03/16/2000	04/26/2004

[First](#) | [Previous](#) | [Next](#) | [Last](#) | [Return to List](#)

[New Search](#)

Record: 1 of 1

The Florida Department of Corrections updates this information regularly, to ensure that it is complete and accurate, however this information can change quickly. Therefore, the information on this site may not reflect the true current location, status, release date, or other information regarding an inmate.

This database contains public record information on felony offenders sentenced to the Department of Corrections. This information only includes offenders sentenced to state prison or state supervision. Information contained herein includes current and prior offenses. Offense types include related crimes such as attempts, conspiracies and solicitations to commit crimes. Information on offenders sentenced to county jail, county probation, or any other form of supervision is not contained. The information is derived from court records provided to the Department of Corrections and is made available as a public service to interested citizens. The Department of Corrections makes no guarantee as to the accuracy or completeness of the information contained herein. Any person who believes information provided is not accurate may contact the Department of Corrections.

For questions and comments, you may contact the Department of Corrections, Bureau of Admission and Release, at (850) 488-9167 or go to [Frequently Asked Questions About Inmates](#) for more information. This information is made available to the public and law enforcement in the interest of public safety.

Search Criteria: Last Name: coker First Name: darrell Search Aliases: on Sex: ALL Race: ALL Offense Category: ALL Classification Status: ALL Current Custody: ALL Identifier Type: ALL Release Type: ALL Release Date: From: Release Facility: Stated County of Residence Upon Release: ALL County of Commitment: ALL Eye Color: ALL Hair Color: ALL

[Return to Corrections Offender Information Network](#)

Information For...

- Media
- Inmate/Offender Families
- Victims
- Students
- Vendors
- Offenders
- Job Seekers
- Volunteers

Publications

- [Recidivism Report](#)
- [Annual Report](#)
- [Annual Substance Abuse Reports](#)
- [Quarterly Escapes Report](#)
- [Agency Strategic Plan](#)
- [Perimeter Check](#)
- [Quick Facts](#)
- [Inmate Orientation Handbook: English - Spanish](#)
- [More...](#)

Orgs & Offices

- [Office of the Secretary](#)
- [Organization](#)
- [Organization Charts](#)
- [Statewide Facility Directory](#)
- [Frequently Called Numbers](#)
- [Citizens' Services](#)

About Us

- [Who Are We?](#)
- [Mission](#)
- [History of Corrections](#)

How Do I...

- [Pay Court Ordered Payments](#)
- [Call an Inmate](#)
- [File a Complaint](#)
- [Send an Inmate Money](#)
- [Write to an Inmate](#)
- [Visit an Inmate](#)
- [Register for Victim Notification](#)

Resources

- [Contact Us](#)
- [Media Release](#)
- [Open Government Information](#)

Special Programs

- [Beekeeping Programs](#)
- [Second Chance Farm: Horse Programs](#)
- [Inmate Dog Adoption Programs](#)
- [Corrections Foundation](#)



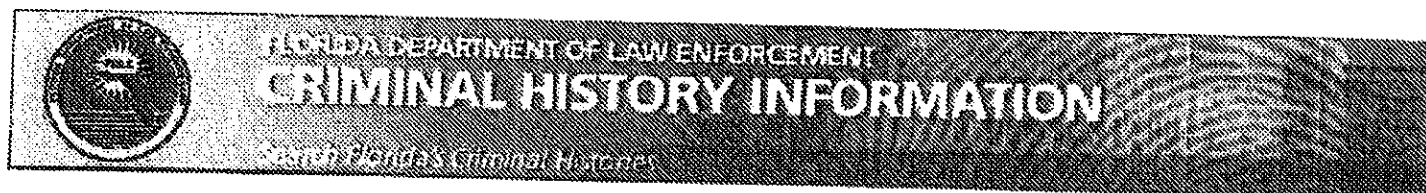
[Privacy Policy](#) | [Accessibility](#)

EXHIBIT

G

Don Dibble

From: InternetCriminalResults@fdle.state.fl.us
Sent: Wednesday, December 09, 2015 12:06 PM
To: Don Dibble
Subject: FDLE Criminal History Search Results for COKER, DARRELL



The following is your search criteria:

Tran ID: 7688019
Name: COKER, DARRELL
Maiden Name/Alias:
SSN:
DOB:
Age: 66
Race: W
Sex: M

Search conducted: 12/9/2015 03:05:23 PM

The following candidates were returned based on the search criteria:

NAME	ALIAS	DOB	SSN	SEX	RACE	HEIGHT	WEIGHT	HAIR	EYES
COKER, DARRELL TYRONE	COKER, DARELL; COKER, DARRELL	19490804; 19450804	XXX-XX-1441	M	W	511	187	HAZ	BRO
COKER, DARRELL GUY	COKER, GUY DARRELL; COKER, GUY TERRELL; COKER, GD; COKER, GUY; COKER, GUY DARROLL	19470508	XXX-XX-0039	M	W	510	150	BRO	GRY

The following criminal history was selected from the above list of candidates:

Criminal History

--FLORIDA CCH RESPONSE--

ATN/ANONCCHINET/DONALDRDIBBLE

FC.DLE/190867.PUR/P.ATN/ANONCCHINET/DONALDRDIBBLE

SID NUMBER: 190867 PURPOSE CODE: F PAGE: 1

BECAUSE ADDITIONS OR DELETIONS MAY BE MADE AT ANY TIME,
A NEW COPY SHOULD BE REQUESTED WHEN NEEDED FOR FUTURE USE

FLORIDA CRIMINAL HISTORY

NAME	STATE ID NO.	FBI NO.	DATE REQUESTED
COKER, DARRELL TYRONE	FL-00190867		12/09/2015
SEX RACE BIRTH DATE HEIGHT WEIGHT EYES HAIR BIRTH PLACE SKIN	DOC NO.		
M W 08/04/1949 5'11" 187 HAZ BRO NC	022412		

--CONTINUED--

SID NUMBER: 190867 PURPOSE CODE: F PAGE: 2

.. FINGERPRINT CLASS	SOCIAL SECURITY NO.	MISCELLANEOUS NO.	SCR/MRK/TAT
11 CM 11 PO 12	XXX-XX-1441		SC RF ARM
12 54 11 13 12			

IN AFIS - 3

OCCUPATION
OWNER

ADDRESS
628 WILDMERE AVE

CITY/STATE
LONGWOOD, FL

LA
DOB SOC SCR/MRK/TAT
COKER, DARELL
08/04/1945
--CONTINUED--

SID NUMBER: 190867 PURPOSE CODE:P PAGE: 3

COKER, DARRELL

ARREST- 1 05/07/1968
ARREST AGENCY-ORANGE COUNTY SHERIFF'S OFFICE (FL0480000)
AGENCY CASE-53333 OFFENSE DATE-
CHARGE 001-ROBBERY-
STATUTE/ORD- LEVEL-FELONY
JUDICIAL-
AGENCY-NORTHWEST FLORIDA RECEPTION CENTER (FL063025C)
CHARGE 001 -COURT SEQ COURT NO.-
COURT DATA-ROBBERY-
ARMED
STATUTE/ORD- LEVEL-FELONY
--CONTINUED--

SID NUMBER: 190867 PURPOSE CODE:P PAGE: 4

DISP DATE-
SENTENCING DATA- DISP-CONVICTED
CONFINED-3Y
SENT PROVISIONS - CREDIT TIME SVD 5M19D

SUPERVISION OR CUSTODY- 05/07/1968 OBTS-NO.-
AGENCY-NORTHWEST FLORIDA RECEPTION CENTER (FL063025C)
AGENCY CASE-022412 STATUS-RECEIVED ,11/05/1968
AGENCY-P&P COMMISSION - TALLAHASSEE (FL037035G)
AGENCY CASE-C0126741 STATUS-PAROLED ,11/18/1969
SUPERVISION OR CUSTODY- 11/18/1969 OBTS-NO.-
AGENCY-P&P COMMISSION - TALLAHASSEE (FL037035G)
--CONTINUED--

SID NUMBER: 190867 PURPOSE CODE:P PAGE: 5

AGENCY CASE-C0126741 STATUS-PAROLED ,11/18/1969
REMARKS-1Y

ARREST- 2 03/10/1972
ARREST AGENCY-ORANGE COUNTY SHERIFF'S OFFICE (FL0480000)
AGENCY CASE-68386 OFFENSE DATE-
CHARGE 001-FRAUD-INSUFF FUNDS CHECK-
STATUTE/ORD- LEVEL-UNKNOWN
CHARGE 002-DISTURB PEACE-
BREACH OF
STATUTE/ORD- LEVEL-MISDEMEANOR

ARREST- 3 11/13/1972
--CONTINUED--

SID NUMBER: 190867 PURPOSE CODE:P PAGE: 6

ARREST AGENCY-ORANGE COUNTY SHERIFF'S OFFICE
AGENCY CASE-53333
CHARGE 001-POSSESSION OF WEAPON-

(FL0480000)
OFFENSE DATE-11/13/1972

DEADLY WPN
STATUTE/ORD-FL790.10
BOOKING STATUS-RELEASED ON BAIL OR OWN RECOGNIZANCE
LEVEL-UNKNOWN

ARREST- 4 08/11/1973

ARREST AGENCY-FLAGLER COUNTY SHERIFF'S OFFICE

(FL0180000)

AGENCY CASE-7318

OFFENSE DATE-

CHARGE 001-PRINCIPLE FIRST DEGREE

STATUTE/ORD-

LEVEL-MISDEMEANOR

--CONTINUED--

SID NUMBER: 190867 PURPOSE CODE:P

PAGE: 7

ARREST- 5 11/25/1974

ARREST AGENCY-ORANGE COUNTY SHERIFF'S OFFICE

(FL0480000)

AGENCY CASE-53333

OFFENSE DATE-11/25/1974

CHARGE 001-AGGRAV ASSLT-NONFAMILY-GUN-

STATUTE/ORD-FL784.04

LEVEL-FELONY

JUDICIAL-

AGENCY-ORANGE COUNTY SHERIFF'S OFFICE

(FL0480000)

CHARGE 001 -COURT SEQ

COURT NO.-

COURT DATA-SIMPLE ASSLT-

BARE

STATUTE/ORD-

LEVEL-MISDEMEANOR

DISP DATE-04/15/1975

DISP-CONVICTED

SENTENCING DATA-

--CONTINUED--

SID NUMBER: 190867 PURPOSE CODE:P

PAGE: 8

CONFINED-2M

SENT PROVISIONS - CREDIT TIME SERVED

ARREST- 6 04/18/1975

ARREST AGENCY-ORANGE COUNTY SHERIFF'S OFFICE

(FL0480000)

AGENCY CASE-53333

OFFENSE DATE-04/18/1975

CHARGE 001-ESCAPE-

AID AND ABET

STATUTE/ORD-FL944.40

LEVEL-FELONY

ARREST- 7 02/25/1976

ARREST AGENCY-WINTER PARK POLICE DEPARTMENT

(FL0480000)

--CONTINUED--

SID NUMBER: 190867 PURPOSE CODE:P

PAGE: 9

AGENCY CASE-75021438

OFFENSE DATE-02/25/1976

CHARGE 001-MARIJUANA-POSSESS-

UNDER 5 GRAMS

STATUTE/ORD-

LEVEL-MISDEMEANOR

ARREST- 8 06/06/1976 OBTS NO.-0000259314

ARREST AGENCY-ORANGE COUNTY SHERIFF'S OFFICE

(FL0480000)

AGENCY CASE-53333

OFFENSE DATE-06/06/1976

CHARGE 001-TRESPASSING-

STATUTE/ORD-FL821.01

LEVEL-UNKNOWN

ARREST- 9 08/25/1976 OBTS NO.-0000269111
ARREST AGENCY-ORANGE COUNTY SHERIFF'S OFFICE
--CONTINUED--

(FL0480000)

SID NUMBER: 190867 PURPOSE CODE:P

PAGE: 10

AGENCY CASE-53333

OFFENSE DATE-08/25/1976

CHARGE 001-CONTEMPT OF COURT-

STATUTE/ORD-FL38.23

LEVEL-MISDEMEANOR

JUDICIAL-

AGENCY-ORANGE COUNTY SHERIFF'S OFFICE

(FL0480000)

CHARGE 001 -COURT SEQ

COURT NO.-

COURT DATA-CONTEMPT OF COURT-

STATUTE/ORD-FL38.23

LEVEL-MISDEMEANOR

STATUTE DESCRIPTN-CONTEMPT OF COURT-

DISP DATE-08/31/1977

DISP-CONVICTED

SENTENCING DATA-

CONFIN-30D

SENT PROVISIONS - CREDIT TIME SRV 10D 20D TO BE SRV 10 CONSEC WKENDS

--CONTINUED--

SID NUMBER: 190867 PURPOSE CODE:P

PAGE: 11

ARREST- 10 02/05/1983

ARREST AGENCY-CASSELBERRY POLICE DEPARTMENT

(FL0590200)

AGENCY CASE-830360026C2

OFFENSE DATE-02/05/1983

CHARGE 001-RESISTING OFFICER-

OBSTRUCT WITHOUT VIOLENCE

STATUTE/ORD-FL843.02

LEVEL-MISDEMEANOR

JUDICIAL-

AGENCY-CASSELBERRY POLICE DEPARTMENT

(FL0590200)

CHARGE 001 -COURT SEQ

COURT NO.-

COURT DATA-RESISTING OFFICER-

OBST WO VIOL

--CONTINUED--

SID NUMBER: 190867 PURPOSE CODE:P

PAGE: 12

STATUTE/ORD-FL843.02

LEVEL-MISDEMEANOR

STATUTE DESCRIPTN-OBSTRUCT WO VIOLENCE

DISP DATE-04/08/1983

DISP-DISMISSED

ARREST- 11 01/25/1990 OBTS NO.-0002096344

ARREST AGENCY-PALM BEACH COUNTY SHERIFF'S OFFICE

(FL0500000)

AGENCY CASE-9000250005

OFFENSE DATE-

CHARGE 001-DISORDERLY CONDUCT-

SERIOUS

STATUTE/ORD-FL877.03

LEVEL-MISDEMEANOR

ARREST- 12 02/19/1992 OBTS NO.-0002501834

ARREST AGENCY-CASSELBERRY POLICE DEPARTMENT

(FL0590200)

--CONTINUED--

SID NUMBER: 190867 PURPOSE CODE:P

PAGE: 13

AGENCY CASE-920500002

OFFENSE DATE-02/19/1992

CHARGE 001-AGGRAV BATTERY-

STATUTE/ORD-FL784.045

LEVEL-FELONY

CHARGE 002-BATTERY-

STATUTE/ORD-FL784.03

LEVEL-MISDEMEANOR

ARREST- 13 06/03/1997 ORTS NO.-0008071236
ARREST AGENCY-SEMINOLE COUNTY SHERIFF'S OFFICE (FL0590000)
AGENCY CASE-9700009799 OFFENSE DATE-06/03/1997
CHARGE 001-FRAUD-
ORGANIZED
STATUTE/ORD- LEVEL-UNKNOWN
BOOKING STATUS-TURNED OVER TO ANOTHER AGENCY
--CONTINUED--

SID NUMBER: 190867 PURPOSE CODE:P PAGE: 14

FL0370000
CHARGE 002-LARCENY-
GRAND
STATUTE/ORD- LEVEL-FELONY
BOOKING STATUS-TURNED OVER TO ANOTHER AGENCY
FL0370000

JUDICIAL-
AGENCY-2ND CIRCUIT COURT - TALLAHASSEE (FL0370353)
CHARGE 001 -COURT SEQ COURT NO.-371997CF001914AXXXX
SUPPLEMENTAL ARREST DATA-
STATUS- LEVEL-FELONY ,1ST DEG
PROSC DATA-AMENDED ,RACKETEERING VIOLATION
PRINCIPAL
--CONTINUED--

SID NUMBER: 190867 PURPOSE CODE:P PAGE: 15

STATUTE/ORD-FL895.03 LEVEL-FELONY ,1ST DEG
STATUTE DESCRIPTN-RACKETEERING VIOLATION
PROS ACTION DATE-07/26/1999 ACTION-FILED
COURT DATA-SAME ,RACKETEERING VIOLATION
PRINCIPAL
STATUTE/ORD-FL895.03 LEVEL-FELONY ,1ST DEG
STATUTE DESCRIPTN-RACKETEERING VIOLATION
DISP DATE-02/04/2000 DISP-GUILTY/CONVICTED
COUNSEL-PRIVATE TRIAL-JURY PLEA-NOT GUILTY
SENTENCING DATA-
SENT DATE-02/04/2000
CONFINED-005Y -005Y ,STATE PRISON
SUSPENDED SENT- CREDITED TIME-0008 DAYS
--CONTINUED--

SID NUMBER: 190867 PURPOSE CODE:P PAGE: 16

CHARGE 002 -COURT SEQ COURT NO.-371997CF001914AXXXX
SUPPLEMENTAL ARREST DATA-
STATUS- LEVEL-FELONY ,2ND DEG
PROSC DATA-AMENDED ,LARCENY-
FAIL TO REMIT STATE SALE TAXMT200000LT100000
PRINCIPAL
STATUTE/ORD-FL212.15(2C) LEVEL-FELONY ,2ND DEG
STATUTE DESCRIPTN-SALES TAX FAIL REMIT 20K UND 100K DOLS
PROS ACTION DATE-07/26/1999 ACTION-FILED
COURT DATA-SAME ,LARCENY-
FAIL TO REMIT STATE SALE TAXMT200000LT100000
PRINCIPAL
STATUTE/ORD-FL212.15(2C) LEVEL-FELONY ,2ND DEG
--CONTINUED--

SID NUMBER: 190867 PURPOSE CODE:P PAGE: 17

STATUTE DESCRIPTION-SALES TAX FAIL REMIT 20K UND 100K DOLS
DISP DATE-03/10/2000 DISP-GUILTY/CONVICTED
COUNSEL-PRIVATE TRIAL-NONE PLEA-NOLO CONTENDRE
SENTENCING DATA-

SENT DATE-03/10/2000
CONFINED-11M 29D -11M 29D ,COUNTY
CONCURRENT ,1997CF01914A00
SUSPENDED SENT-

CREDITED TIME-0043 DAYS

ARREST- 14 11/04/1998 OBTS NO.-5901008793
ARREST AGENCY-SEMINOLE COUNTY SHERIFF'S OFFICE (FL05S00000)
AGENCY CASE-297007 OFFENSE DATE-11/04/1998
CHARGE 001-TRAFFIC OFFENSE-
--CONTINUED--

SID NUMBER: 190867 PURPOSE CODE:P PAGE: 18

DUI ALCOHOL OR DRUGS FIRST CONVICTION
STATUTE/ORD-FL316.193

LEVEL-MISDEMEANOR,2ND DEG

SUPERVISION OR CUSTODY- 03/16/2000 OBTS-NO.-6351003702
AGENCY-DEPARTMENT OF CORRECTIONS (FL063035C)
AGENCY CASE-022412 STATUS-RECEIVED

SUPERVISION OR CUSTODY- 03/16/2000 OBTS-NO.-
AGENCY-NORTHWEST FLORIDA RECEPTION CENTER (FL063025C)
AGENCY CASE-A022412 STATUS-DISCHARGED FROM CRIMINAL ,04/26/2004
REMARKS-ACQUIRE PROP F RACKETEERING

THIS RECORD CONTAINS FLORIDA INFORMATION ONLY. WHEN EXPLANATION OF A CHARGE
-CONTINUED--

SID NUMBER: 190867 PURPOSE CODE:P PAGE: 19

OR DISPOSITION IS NEEDED, COMMUNICATE DIRECTLY WITH THE AGENCY THAT CONTRIBU-
TED THE RECORD INFORMATION. IF YOU DID NOT SUBMIT FINGERPRINTS, THIS RECORD IS
PROVIDED AS A RESULT OF A NAME INQUIRY ONLY. POSITIVE IDENTIFICATION CAN ONLY
BE VERIFIED BY SUBMISSION OF A FINGERPRINT CARD AND COMPARISON BY FDLE. THIS
RECORD WAS REQUESTED PURSUANT TO 943.053(3), F.S.

AS MANDATED BY FLORIDA STATUTE 119.071(5), FULL SOCIAL
SECURITY NUMBERS ARE NOW EXEMPT FROM PUBLIC DISCLOSURE
AND MAY BE DISCLOSED ONLY TO GOVERNMENTAL ENTITIES AND
CERTAIN COMMERCIAL ENTITIES (UPON A SHOWING OF BUSINESS
NECESSITY AS DEFINED BY THE LAW). FDLE WILL, HOWEVER,
RELEASE THE LAST FOUR DIGITS OF THE SOCIAL SECURITY NUMBER.
EXAMPLE: XXX XX 1234.

THIS CONTAINS FLORIDA RECORD ONLY.
--CONTINUED--

SID NUMBER: 190867 PURPOSE CODE:P PAGE: 20

UNKNOWN AS TO NATIONAL RECORD STATUS.
END OF RECORD

--END--

EXHIBIT

H

50

1 PCON
2 Darrell Robert Coker
3 3440 Falla Street
4 Las Vegas, Nevada 89146
5 (702) 630-1709
6 In Proper Person

A-10-620791-P
PCON
Petition for Change of Name
880000



FILED

JUL 16 12 33 PM '11

EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA
CLERK OF THE COURT

7 In the Matter of the Application of:
8 DARRELL ROBERT COKER,
9 for Change of Name.

CASE NO.: A-10-620791-P
DEPT. NO.: XIV

11 PETITION FOR CHANGE OF NAME

12 COMES NOW, DARRELL ROBERT COKER ("Petitioner"), In Proper Person, and
13 respectfully submits:

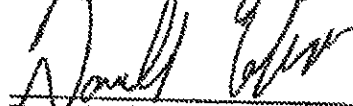
- 14 1. That Petitioner has resided in Clark County over one year and intends to make Clark
15 County Petitioner's home for at least an indefinite period of time;
- 16 2. That Petitioner's current name is DARRELL ROBERT COKER, and Petitioner
17 desires to take another name than the one which Petitioner has now;
- 18 3. The name Petitioner wishes to change to is WILLIAM JAMES RHODES;
- 19 4. Petitioner wants to change Petitioner's name because Petitioner was adopted and
20 Petitioner's adoptive father changed Petitioner's name from WILLIAM JAMES ROGERS to
21 DARRELL ROBERT COKER, and Petitioner no longer wishes this name and would like to retake
22 Petitioner's former first and middle names of WILLIAM JAMES and change the surname to
23 RHODES.
- 24 5. That Petitioner has never been convicted of a felony;
- 25 6. That Petitioner is not changing name in order to defraud creditors or for some other
26 fraudulent reason;
- 27 7. That Petitioner was born on December 16, 1970 in the city of Orlando, state of
28 Florida.

RECEIVED
JUL 16 2011
CLERK OF THE COURT

1 WHEREFORE, Petitioner prays that the Court enter its Order changing Petitioner's legal
2 name to WILLIAM JAMES RHODES.

3 DATED this 15 day of July, 2010.

5 Respectfully submitted by:

6 

7 Darrell Robert Coker
8 3440 Falla Street
9 Las Vegas, Nevada 89146
10 (702) 630-1709
11 In Proper Person

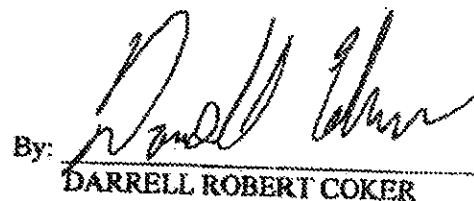
12 VERIFICATION

12 STATE OF NEVADA)
13)
13 COUNTY OF CLARK)

14 I, DARRELL ROBERT COKER, under penalty of perjury, being first duly sworn, deposes
15 and says:

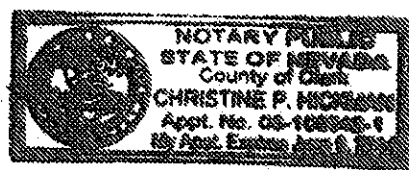
- 16 1. I am the Petitioner in the above-entitled action;
17 2. I have read the foregoing Petition for Change of name and know the contents thereof;
18 3. That the same is true of my own knowledge, except for those matters therein
19 contained stated upon information and belief, and as to those matter I believe them to be true.

20 DATED this 15 day of July, 2010.

21 By: 
22
23 DARRELL ROBERT COKER

24 SUBSCRIBED and SWORN to before me
25 this 15 day of July, 2010.

26 
27 NOTARY PUBLIC




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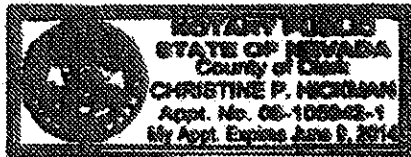
ACKNOWLEDGMENT

STATE OF NEVADA)
)
COUNTY OF CLARK)

On this 15 day of July before me, Christine Hickman, the undersigned Notary Public in and for said County and State, personally appeared, DARRELL ROBERT COKER, known to me to be the person described in and who executed the foregoing Petition for Change of Name, and who acknowledged to me that he/she did so freely and voluntarily and for the uses and purposes therein mentioned.

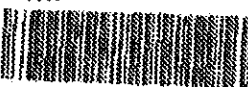
WITNESS my hand and official seal.


NOTARY PUBLIC



EXHIBIT

I



PCON
 DARRELL TYRONE COKER
 6130 West Flamingo Road #275
 Las Vegas, Nevada 89103
 (702) 439-1995
 Petitioner, in Proper Person

FILED

JUL 06 2010

CLERK OF COURT

DISTRICT COURT
 CLARK COUNTY, NEVADA

In the Matter of the Application of:

DARRELL TYRONE COKER,

for Change of Name to:

MAJOR T. DAVIS,

CASE NO:

DEPT. NO:

A-10-620179-P

14

PETITION FOR CHANGE OF NAME

COMES NOW, Petitioner, DARRELL TYRONE COKER, and respectfully shows:

1. That the Petitioner, DARRELL TYRONE COKER, has resided in Clark County, Nevada since 2004 and intends to make Clark County his home for an indefinite period of time.

2. That the Petitioner was born on August 14, 1949.

3. That the Petitioner's present name is DARRELL TYRONE COKER. The Petitioner wishes to change his name to MAJOR T. DAVIS which is a family surname name. Further, the Petitioner wishes to change his first name to MAJOR as this has been a nickname of his for many years.

4. That the Petitioner has never been convicted of a felony.

5. That the Petitioner is NOT changing his name to defraud creditors or for some other fraudulent reason.

4. That the Bureau of Vital Statistics in the State of North Carolina issues a new BIRTH CERTIFICATE in the name of MAJOR T. DAVIS and not reflecting an AKA (also known as) names.

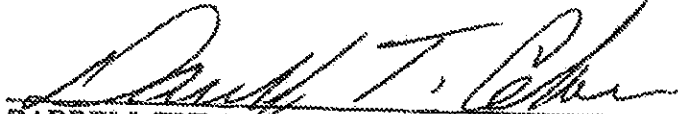
CE36

1 WHEREFORE, Petitioner prays that the Court enter its Order changing his name to;

2 MAJOR T. DAVIS

3 and for such other and further relief as the Court shall deem just and proper.
4

5 Respectfully Submitted:
6

7 

8 DARRELL TYRONE COKER, Petitioner, In Pro Per
9
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VERIFICATION

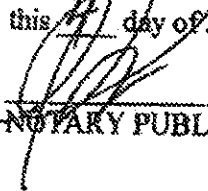
STATE OF NEVADA)
) SS
COUNTY OF CLARK)

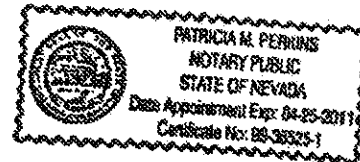
DARRELL TYRONE COKER, being first duly sworn, deposes and says:

That he is the Petitioner in the above-entitled action and has read the foregoing
Petition for Change of Name and knows the contents thereof, and that the same is true of his own
knowledge, except as to those matters stated therein on information and belief, and as to those
matters, he believes it to be true.


DARRELL TYRONE COKER, Petitioner

SUBSCRIBED and SWORN to before me
this 7 day of June, 2010.


NOTARY PUBLIC in and for said County and State.

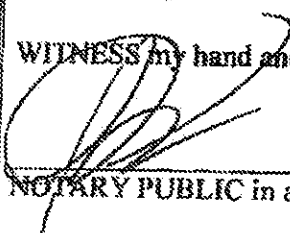


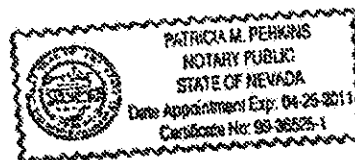
ACKNOWLEDGMENT

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

On this 4 day of June, 2010, before me, the undersigned Notary Public in
and for said County and State, personally appeared DARRELL TYRONE COKER, known to me
to be the person described in and who executed the foregoing, Petition for Change of Name and
who acknowledged to me that she did so freely and voluntarily and for the uses and purposes
therein mentioned.

WITNESS my hand and official seal.


NOTARY PUBLIC in and for said County and State



EXHIBIT

J

1 NOTC

2 (Your name) Dartell Robert Coker

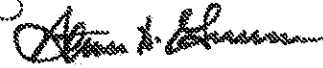
3 (Address) 6565 Eldora Street

4 Las Vegas, NV 89146

5 (Telephone) (702) 638-1709

6 In Proper Person

Electronically Filed
02/07/2012 03:03:07 PM


CLERK OF THE COURT

7 DISTRICT COURT

8 CLARK COUNTY, NEVADA

9 In the Matter of the
10 Application of:

11 Dartell Robert Coker

CASE NO: D-12-458560-N

DEPT. NO. G

12 for Change of Name
13

14 **NOTICE OF PETITION FOR CHANGE OF NAME**

15 NOTICE IS HEREBY GIVEN that the undersigned has filed a Petition, addressed to
16 the above-entitled Court, praying that said Court enter its Order to change the present legal name
17 of Petitioner (your name) Dartell Robert Coker to the name of (your new name)
18 James Whitacker, which is the name Petitioner desires to have in
19 the future.

20 NOTICE IS HEREBY GIVEN that any person having objection to the changing of
21 Petitioner's name as aforesaid shall file written objection with the above-entitled Court within
22 ten (10) days after the date of last publication of this Notice.

23 By:

24 (Your signature) 

25 (Your name) Dartell R. Coker

1 PCON

2 (Your name) Darrell Robert Coker

3 (Address) 6565 Eldora Street
4 Las Vegas, NV 89146

Electronically Filed
02/07/2012 03:01:56 PM

5 (Telephone) (702) 630-1709

6 In Proper Person

Alma L. Johnson

CLERK OF THE COURT

7
8 DISTRICT COURT

9 CLARK COUNTY, NEVADA

10 In the Matter of the
11 Application of:

CASE NO: D-12-458560-N

12 Darrell Robert Coker

DEPT. NO. G

13 for Change of Name

14
15 PETITION FOR CHANGE OF NAME

16 COMES NOW, Petitioner, (your name) Darrell R. Coker and respectfully

17 shows:

18 1. That Petitioner (your name) Darrell R. Coker has resided in
19 Clark County since (date) 06/06/2002 and intends to make Clark County

20 (check one) ☒ his/ ☐ her home for at least an indefinite period of time.

21 2. That Petitioner's current name is Darrell Robert Coker.

22 Petitioner desires to take another name than which (check one) ☒ he/ ☐ she has now. The new
23 name that Petitioner wishes to assume is James Whitacker.

24 3. Petitioner wants to change (check one) ☒ his/ ☐ her name because
25 relatives with same name and last name

1 have caused issues in my business matters.

2 4. That Petitioner has never been convicted of a felony.

3 5. That Petitioner is not changing (check one) ☒ his/ ☐ her name in order to defraud
4 creditors or for some other fraudulent reason.

5 6. That Petitioner was born on (date) 12/16/1970 in (city and
6 state) Orlando, Florida

7 WHEREFORE, Petitioner prays that the above-entitled Court enter its Order changing
8 (check one) ☒ his/ ☐ her legal name to (your new name) James Whitacker
9 and for such other and further relief as the Court shall deem just
10 and proper.

11 Respectfully submitted:
12 (Your signature)

13 (Your name)

14 (Address)

15 (Telephone)

16
17
18 In Proper Person

19 VERIFICATION

20 STATE OF NEVADA)

21) ss:
22 COUNTY OF Clark County)

(Your name) Darrell R. Coker, under penalties of perjury, being
23 first duly sworn, deposes and says:

24 That I am the Petitioner in the above-entitled action; that I have read the foregoing
25 Petition for Change of Name and know the contents thereof; that the same is true of my own

1 knowledge, except for those matters therein contained stated upon information and believe, and
2 as to those matters I believe them to be true.

3 DATED this 06 day of (month) January, (year) 2012.

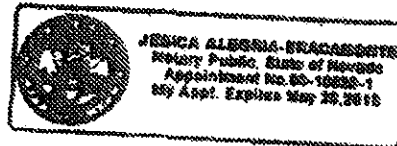
4 By:

5 (Your signature) [Signature]

6 (Your name) Dartell R. Coker

7
8 SUBSCRIBED and SWORN to before
9 me this 06 day of
10 (month) January (year) 2012.

11 [Signature]
12 Jessica AB
13 NOTARY PUBLIC

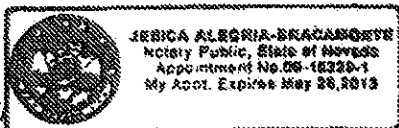


14 ACKNOWLEDGMENT

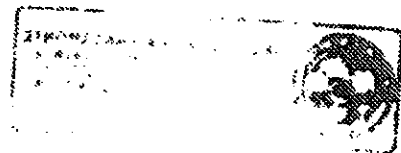
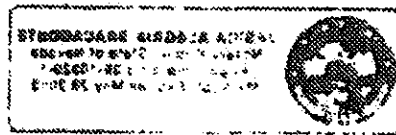
15 STATE OF NEVADA)
16) ss:
17 COUNTY OF CLARK)

18 On this 06 day of (month) January, 2012, before me, the
19 undersigned Notary Public in and for the said County and State, personally appeared (your
20 name) Dartell R. Coker, known to me to be the person described in and who
21 executed the foregoing Petition for Change of Name, and who acknowledged to me that (check
22 one) he/ she did so freely and voluntarily and for the uses and purposes therein mentioned.

23 WITNESS my hand and official seal.



24 [Signature]
25 Jessica AB
26 NOTARY PUBLIC



Alvin J. Johnson

CLERK OF THE COURT

1 AFPT

2 (Your name) Darrell Robert Coker

3 (Address) 6565 Eldora Street

4 Las Vegas, NV 89146

5 (Telephone) (702) 638-1709

6 In Proper Person

7 DISTRICT COURT

8 CLARK COUNTY, NEVADA

9 In the Matter of the
10 Application of:

11 Darrell Robert Coker

CASE NO:

D-12-458560-N

DEPT. NO.

G

12 for Change of Name

13
14 **AFFIDAVIT OF PETITIONER**

15 STATE OF NEVADA)

16) ss:
17 COUNTY OF Clark County)

18 1. I, (your name) Darrell Robert Coker Petitioner, do solemnly

19 swear to testify herein to the truth, the whole truth and nothing but the truth.

20 2. That I am the Petitioner in the above-entitled case.

21 3. That I live at 6565 Eldora Street (city)

22 Las Vegas Nevada, (zip code) 89146

23 4. That I first moved to Clark County, Nevada on (date) 06/06/2002

24 It is my intention to live in Clark County for the foreseeable future.

25 5. That I have read the Petition for Change of Name in this case and can testify that

1 the allegations in the Petition are true and correct to the best of my knowledge.

2 6. That I request that the Court change my name from Darrell

3 Robert Coker to James Whitacker

4 7. That I have not been convicted of a felony.

5 8. That I am not changing my name to avoid creditors or to commit a fraud.

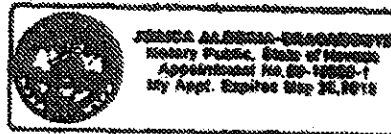
6 Dated this (day) 06 day of (month) January (year) 2012.

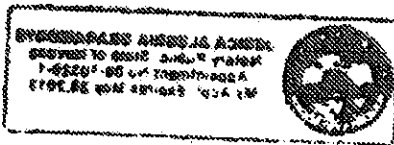
7 (Your signature) [Signature]

8 (Your name) Darrell R. Coker

10
11 SUBSCRIBED and SWORN to before
12 me this 06 day of
13 (month) January (year) 2012.

14 Jessica AB
15 NOTARY PUBLIC





Alvin L. Johnson

CLERK OF THE COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

IN THE MATTER OF THE PETITION
FOR CHANGE OF NAME BY:
DARRELL ROBERT COKER,
PETITIONER(S).

CASE NO: D-12-458560-N

DEPARTMENT G

SCOPE REPORT FOR DARRELL ROBERT COKER

Submitted by:

Jessica Alegria

Name:

Address:

City/State/Zip:

Telephone:

Jessica Alegria
9801 Snowy Canyon Ct.
Las Vegas, NV 89183
(702) 409-4228

ATTN: LYMPO Correspondence

2, Darrell Robert Coker, am
requesting a personal scope
for name change purposes.
Darrell Robert Coker
Birthday: 12/16/70
Last 4 of S.S.: 6891

PER NEVADA AS VIDEO SUGGESTS, THE LAS VEGAS METROPOLITAN POLICE DEPARTMENT IS AUTHORIZED TO RELEASE OUR AGENCY'S CRIMINAL HISTORY INFORMATION ONLY.

FOR OTHER AGENCY INFORMATION, CONTACT
THE AGENCY DIRECTLY

FOR COMPLETE BACKGROUND CHECKS, CONTACT
THE STATE OF NEVADA DEPOSITORY AT
775-334-8282

Enclosed is the 9.00 fee
please forward scope to:

Darrell R. Coker
 c/o Jessica Alegria
 2004 E. Charleston Blvd
 W, NV 89104

Paul Gray

This information is exempt from GDS release.
 Record is Regulated by Law. Secondary
 dissemination of any kind is prohibited
 and could subject the information to Criminal
 and Civil Liability.
 This information is Regulated by
 the Freedom of Information Act.
 Daniel P. Boyd
 27 JAN 1977 Date 3/5/12
 at Vantage Marine Poling Dept

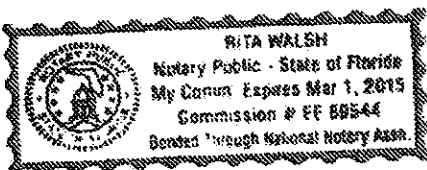
State of Florida
County of Volusia

The foregoing instrument was acknowledged before me this 13th day of MARCH 2012 by Barrell Robert Walker who is personally known or who has produced MONADA - BL as identification.

Kira Walsh
Notary Public

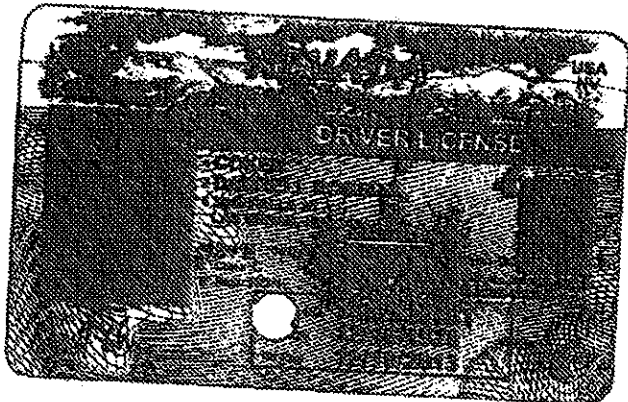
NO MISDEMEANOR OR FELONY
CONVICTIONS WITH THIS DEPARTMENT
LAS VEGAS METROPOLITAN POLICE DEPARTMENT

Darrell Robert Coke
DARRELL Robert Coke



IDENTITY NOT VERIFIED BY FINGERPRINTS

SASS000072



FILED

MAR 28 8 14 AM '12

Ann L. Johnson
CLERK OF THE COURT

ORDER

(Your name) Dartell Robert Coker
(Address) 6565 Eldora Street
Las Vegas, NV 89146
(Telephone) (702) 630-9709
In Proper Person

DISTRICT COURT

CLARK COUNTY, NEVADA

In the Matter of the
Application of:

CASE NO: D-12-458560-N
DEPT. NO. G

Dartell Robert Coker
for Change of Name

ORDER FOR CHANGE OF NAME

This matter having come on for (check one) ☐ hearing/ ☒ summary disposition in the
Family Division of the Eighth Judicial District Court, County of Clark; and the Court being fully
advised in the premises, both as to subject matter as well as the party thereto, and that
jurisdiction is proper in Nevada, and good cause appearing therefore;

IT IS HEREBY ORDERED that Petitioner (your current name) Dartell

Robert Coker, born on (date) 12/16/1970, in (city and state)
Orlando, Florida, name be changed from Dartell Ro-
bert Coker to James Whitacker.

DATED this 12th day of March, 2012

Respectfully submitted:

(Your signature)

(Your name)

(Address)

(Telephone)

Dartell Robert Coker
Dartell Robert Coker
6565 Eldora Street
Las Vegas, NV 89146
(702) 630-9709
In Proper Person

Deanne Fied
DISTRICT COURT JUDGE

RECEIVED

FEB 28 2012

RECEIVED

adoptionsection.6sk (#5)
Please call the Self-Help Center to confirm most current version.

AFFIDAVIT OF PUBLICATION

STATE OF NEVADA)
COUNTY OF CLARK) SS:

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03/22/2012 03:14:43 PM

Stacey M. Lewis

CLERK OF THE COURT

Stacey M. Lewis, being 1st duly sworn, deposes and says: That she is the Legal Clerk for the Las Vegas Review-Journal and the Las Vegas Sun, daily newspapers regularly issued, published and circulated in the City of Las Vegas, County of Clark, State of Nevada, and that the advertisement, a true copy attached for,

DARRELL ROBERT COKER

6301709COK

7747373

was continuously published in said Las Vegas Review-Journal and / or Las Vegas Sun in 3 edition(s) of said newspaper issued from 02/17/2012 to 03/02/2012, on the following days:

02/17/2012
02/24/2012
03/02/2012

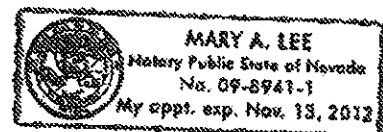
NOTICE CASE NO: D-12-65880-N
DEPT. NO: 0
DISTRICT COURT
CLARK COUNTY, NEVADA
In the Matter of the Application
of: Darrell Robert Coker for
Change of Name
NOTICE OF PETITION
FOR CHANGE OF NAME
NOTICE IS HEREBY GIVEN that the
undersigned has filed a Petition,
addressed to the above-entitled
Court, praying that said Court
enter its Order to change the
present legal name of Petitioner
Darrell Robert Coker to the name
of James Whitaker, which is the
name Petitioner desires to have
in the future.
NOTICE IS HEREBY GIVEN that
any person having objection to
the changing of Petitioner's
name as aforesaid shall file
written objection with the
above-entitled Court within ten
days after the date of last
publication of this Notice.
By: DARRELL R. COKER
as Petitioner
Pub: Feb. 17, 24, Mar. 2, 2012
LV Review-Journal

Signed: *Stacey M. Lewis*

SUBSCRIBED AND SWORN BEFORE ME THIS, THE

2nd day of *March*, 2012.

Mary Lee
Notary Public



SASS000075

1 RSDN

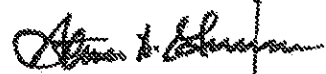
2 (Your name) Darrell Robert Coker

3 (Address) 6565 Eldora Street
4 Las Vegas, NV 89146

5 (Telephone) (702) 630-1709

6 In Proper Person

Electronically Filed
02/07/2012 03:04:25 PM



CLERK OF THE COURT

7 DISTRICT COURT

8 CLARK COUNTY, NEVADA

9 In the Matter of the
10 Application of:

11 Darrell Robert Coker

12 for Change of Name

CASE NO: D-12-458560-N

DEPT. NO. G

13
14 REQUEST FOR SUMMARY DISPOSITION OF
15 PETITION FOR CHANGE OF NAME

16 STATE OF NEVADA)

17) ss:

COUNTY OF Clark County)

18 COMES NOW, Petitioner, (your name) Darrell Robert Coker

19 requests this Court for a summary disposition for a change of name without a hearing.

21 Respectfully submitted,

22 (Your signature)

23 (Your name)

(Your address)

24 (Telephone)



DARRELL ROBERT COKER
6565 ELDORA STREET
LAS VEGAS, NV 89146
(702) 630-1709
In Proper Person

EXHIBIT 2

EXHIBIT 2

1 **ACOM**
2 **GENTILE CRISTALLI**
3 **MILLER ARMENI SAVARESE**
4 **DOMINIC P. GENTILE**
5 Nevada Bar No. 1923
6 Email: dgentile@gcmaslaw.com
7 410 S. Rampart Blvd., Suite 420
8 Las Vegas, NV 89145
9 Telephone (702) 880-0000
10 Facsimile (702) 778-9709
11 Attorneys for Plaintiff Marco Sassone


CLERK OF THE COURT

8 **EIGHTH JUDICIAL DISTRICT COURT**
9 **CLARK COUNTY, NEVADA**

10 **MARCO SASSONE,**
11 **Plaintiff,**

12 **vs.**

13
14 **DARRELL T. COKER an individual,**
15 **DARRELL R. COKER, an individual,**
16 **RICHARD MORELLO an individual,**
17 **DARRYL MCCULLOUGH an individual,**
18 **AND THE JELLO'S JIGGLIN, LLC d/b/a**
19 **Postal Annex, DOES 1-10, and ROE**
20 **ENTITIES 1-10, inclusive,**

21 **Defendants.**

CASE NO. A-16-742853-C
DEPT. XXVIII

AMENDED COMPLAINT

Exemption from Arbitration
Damages in Excess of \$50,000

22 COMES NOW, Plaintiff Marco Sassone ("Sassone") by and through counsel of record, of
23 the law firm Gentile Cristalli Miller Armeni Savarese, and hereby complains and alleges against
24 Defendants, Darrell T. Coker ("Coker"); Darrell R. Coker ("Coker Jr."); Richard Morello
25 (Morello); Richard McCullough ("McCullough"); And The Jello's Jigglin, LLC, d/b/a Postal
26 Annex ("Postal Annex"), Does 1-10, and Roe Entities 1-10, inclusive as follows:

27 **I.**

28 **THE PARTIES, JURISDICTION, AND VENUE**

1. Plaintiff Sassone is, and at all relevant times hereto was, a resident of Toronto,
Canada.

2. Upon information and belief, Defendant Darrell T. Coker is, and at all relevant times hereto was, an individual resident of Clark County, Nevada.

3. Upon information and belief, Defendant Darrell R. Coker is, and at all relevant times hereto was, an individual resident of Clark County, Nevada.

4. Upon information and belief, Defendant Richard J. Morello is, and at all relevant times hereto was, an individual resident of Clark County, Nevada.

5. Upon information and belief, Defendant Darryl McCullough is, and at all relevant times hereto was, an individual resident of Clark County, Nevada.

6. Upon information and belief, Defendant And The Jello's Jigglin, LLC, d/b/a/ Postal Annex is, and at all relevant times hereto was, a Nevada Limited Liability Corporation with its principal place of business located in Clark County, Nevada.

7. Defendants designated herein as Does and Roes entities are individual and legal entities that are liable to Plaintiff for the claims set forth herein. The transactions and true capacities of Does and Roes entities are presently unknown to Plaintiff, and therefore, Plaintiff sue said Defendants by such fictitious names. Plaintiff will amend this Complaint to assert the true names and capacities of such Doe and Roe entities when more information has been ascertained.

8. This Court has personal jurisdiction over all Defendants as, at all times relevant hereto, they are individual residents of Clark County, Nevada, and they did business regularly and systematically in Clark County, Nevada. Thus, jurisdiction and venue are proper in Clark County, Nevada.

II. GENERAL ALLEGATIONS

9. Sassone repeats, re-alleges and incorporates the allegations set forth in the preceding paragraphs of this Complaint as if fully set forth herein.

10. Sassone is, and at all relevant times hereto, was an artist and painter who created numerous works of visual art ("Works") using a number of mediums including, but not limited to, watercolor, oil paint, and serigraph.

///

1 11. Sassone has neither produced, nor sold any Works in the lithograph medium.

2 12. All Works are wholly original by Plaintiff Sassone and are copyrightable subject
3 matter under the laws of the United States and Nevada common law.

4 13. Sassone was also the subject of an artist monograph book entitled Sassone
5 ("Monograph Book") which was published in 1979, and was published again in 1985 by Donelson
6 Hoopes ISBN: 0-935194-00-2.

7 14. The Monograph Book included over one hundred photos of Sassone's Works.

8 15. The Monograph Book is available to the general public for purchase online through
9 websites including, but not limited to, ebay.com and amazon.com.

10 16. Plaintiff Sassone is now, and at all relevant times has been, the sole owner of all
11 right, title, and interest in and to the Copyright in his Works.

12 17. Plaintiff Sassone has not commissioned, licensed, assigned, or relinquished any
13 rights in any of his Works.

14 18. Upon information and belief, Coker and Coker Jr. acquired the Monograph Book.

15 19. Upon information and belief, beginning no later than 2008, Coker and Coker Jr.
16 began intentionally imitating and producing fraudulent lithographs ("Lithographs") from the
17 images in the Monograph Book without permission or license from Plaintiff Sassone.

18 20. **Exhibit A** contains a list that includes, but is not limited to, the titles of the
19 infringed Works of Sassone.

20 21. Upon information and belief, Coker and Coker Jr. imposed a forged signature of
21 Sassone on the fraudulent Lithograph productions.

22 22. Upon information and belief, Coker and Coker Jr. conspired and caused to be
23 formed numerous limited liability corporations as auction businesses that allegedly operated
24 throughout the United States.

25 23. Upon information and belief, Coker and Coker Jr. caused to be formed auction
26 businesses in, including but not limited to, Utah, Colorado, and Oklahoma.

27 ///
28 ///
29

1 24. Upon information and belief, Coker and Coker Jr. conspired and worked in concert
2 with Morello, and others, to create websites for said auction businesses. A list of websites and
3 related businesses can be found in **Exhibit B**.

4 25. Upon information and belief, Morello established the websites for these businesses
5 and small art galleries that were subsequently used as auctioneers to participate in online auction
6 sales at major auction webhosts such as: iCollector.com, Liveauctioneers.com, Auctionzip.com,
7 and Invaluable.com. **See Exhibit C**.

8 26. Upon information and belief, Coker and Coker Jr. offered for auction the fake
9 Lithograph productions and advertised them as "Original Signed Lithograph by Artist Marco
10 Sassone" or "Lithograph After Marc Sassone."

11 27. Upon information and belief, Coker and Coker Jr. sold numerous fake Lithographs
12 at auctions for various prices starting at \$100 and above. The prices of sale ranged from \$100-
13 \$650.

14 28. Upon information and belief, Coker and Coker Jr. advertised that the sham
15 Lithographs would be sold with a certificate of authenticity.

16 29. Upon information and belief, Coker and Coker Jr. provided a fraudulent,
17 meaningless, self-produced certificate of authenticity with each sold bogus Lithograph.

18 30. Upon information and belief, Coker and Coker Jr. worked in concert with
19 McCullough to distribute the infringing sham Lithographs through Postal Annex, a company
20 located in Las Vegas, Nevada.

21 31. Upon information and belief, McCullough caused the infringing Lithographs to be
22 shipped to respective buyers from Postal Annex.

23 32. Upon information and belief, on or about November 25, 2014, Sarah Burton visited
24 the website iCollector.com where Art and Jewelry Auction House, located in Las Vegas, Nevada
25 and controlled by Darrell T. Coker, listed an "Original Signed Lithograph by Artist Marco
26 Sassone" for auction. Sarah Burton placed a bid, and the Lithograph was sold to Sarah Burton for a
27 bid price of \$199.12. The Lithograph was subsequently shipped by Postal Annex.

1 33. Upon information and belief, on or about December 10, 2014, Diane Menninger
2 visited the website iCollector.com where Art and Jewelry Auctions House, located in Las Vegas,
3 Nevada and controlled by Darrell T. Coker, listed an "Original Signed Lithograph by Artist Marco
4 Sassone" for auction. Diane Menninger placed a bid, and the Lithograph was sold to her for a bid
5 price of \$227.50. The Lithograph was subsequently shipped by Postal Annex. The tracking number
6 from Postal Annex was sent to Diane Menninger by McCullough.

7 34. Upon information and belief, on or about December 22, 2014, Collin Clark visited
8 the website iCollector.com where Whole Sale Art Auctions, located in Salt Lake City, Utah, listed
9 an "Original Signed Lithograph By Artist Marco Sassone" for auction. Collin Clark placed a bid,
10 and the Lithograph was sold to him for a bid price of \$229.25. The Lithograph was subsequently
11 shipped by Postal Annex.

12 35. Upon information and believe, on or about January 20, 2015, Jelena Popovic visited
13 the website Live Auctioneers where Wilson Fine Art and Antique listed a "Lithograph after Marco
14 Sassone" for sale at auction. Jelena Popovic placed a bid, and the Lithograph was sold to her for a
15 bid price of \$275.00. The Lithograph was subsequently shipped by Postal Annex.

16 36. Upon information and belief, Defendants, each of them, have been, without
17 limitation, producing, distributing, marketing, promoting, advertising, demonstrating, offering for
18 sale, and in fact selling, unauthorized and illegal copies of Sassone's Works. The illegal production
19 and distribution of the Works includes, but is not limited to, the acts hereinabove alleged.

20 37. Sassone did not become aware of Defendants' illegal and unauthorized copying,
21 forging, and selling of his Works until October 2014 when he discovered the auctions on the
22 Internet.

23 38. Sassone purposefully restricted the availability of his Works to maintain a limited,
24 exclusive collection of artist originals, and originally signed derivative Works available to the
25 public.

26 39. Sassone produced Serigraphs in limited productions, roughly one hundred (100) to
27 one hundred fifty (150) works, which significantly differ from the Lithographs produced by Coker
28 and Coker Jr.

40. Defendants' acts of copying, imitating, fraudulently producing, forging, and selling the Works of Sassone have and will continue to increase the presumed availability of Sassone's Works, thereby significantly diluting the market value of his Works.

41. The mass production and sale of Sassone's fraudulent and fake Works sold at low prices has, and will continue to have, an adverse economic impact on Sassone.

42. Sassone has incurred, and will continue to incur, significant lost revenues as long as the infringing acts of Defendants continues.

43. Defendants profited significantly, and will continue to profit significantly, from the mass production and sale of Sassone's fraudulent Works.

44. Sassone has been harmed in both reputation and income as a result of the actions of Defendants. There is no adequate remedy at law to completely abate the harm incurred by Sassone. The harm to Sassone and his reputation is irreparable and will continue unless Defendants are enjoined from their intentional egregious acts.

III. CLAIMS FOR RELIEF

FIRST CLAIM FOR RELIEF (Deceptive Trade Practice)

45. Sassone repeats, re-alleges and incorporates the allegations set forth in the preceding paragraphs of this Complaint as if fully set forth herein.

46. Defendants Coker and Coker Jr. knowingly forged Sassone's name on to the infringed fraudulent Lithograph productions to pass off the goods as those of Sassone in violation of NRS 598.0915.

47. Defendants Coker and Coker Jr. knowingly made false representations as to the source of the bogus Lithographs when they advertised the Works as "Original Signed Lithograph by Artist Marco Sassone" and/or "Lithograph After Marco Sassone" in violation of NRS 598.0915.

48. Defendants Coker and Coker Jr. knowingly made false representations as to the certification of goods when they sold the sham Lithographs with self-produced, fraudulent certificates of authenticity in violation of NRS 598.0915.

49. Defendants Coker and Coker Jr. knowingly made false representations as to the affiliation, sponsorship, connection, and approval of Sassone when they sold the fake, unauthorized Lithographs of Sassone's Work in violation of NRS 598.0915.

50. Defendants Coker and Coker Jr. knowingly made false and misleading representations of fact that disparaged, damaged, and irreversibly harmed the reputation and business of Sassone in violation of NRS 598.0915.

51. As a direct and proximate result of Defendants' actions, Sassone is entitled to restitution in an amount to be proven at trial in excess of \$10,000 plus prejudgment interest.

52. As a direct and proximate result of Defendants' actions, Sassone has been required to retain the services of an attorney to prosecute this claim and is entitled to be compensated for any costs incurred in the prosecution of this action, including without limitation, any and all costs and attorney's fees.

SECOND CLAIM FOR RELIEF
(Violation of the Right of Publicity)

53. Sassone repeats, re-alleges, and incorporates the allegations set forth in the preceding paragraphs of this Complaint as if fully set forth herein.

54. Sassone has the right of publicity in the use of his name and signature per Nevada Trade Regulation Right of Publicity NRS 597.790.

55. Defendants Coker and Coker Jr. knowingly used the name and signature of Sassone by placing it upon or indicating the source of the infringing Lithograph works they created without consent, written or otherwise, from Sassone in violation of NRS 597.790.

56. By doing so, Defendants Coker and Coker Jr. infringed Sassone's right of publicity in violation of NRS 597.790.

57. As the direct and proximate result of Defendants' violations of Sassone's right of publicity, Sassone has suffered, and will continue to suffer, monetary damages and irreparable injury to his reputation and goodwill.

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1 58. As a direct and proximate result of Defendants' actions, Sassone is entitled to actual
2 damages and punitive damages in an amount to be proven at trial in excess of \$10,000 plus
3 prejudgment interest.

4 59. As a direct and proximate result of Defendants' actions, Sassone has been required
5 to retain the services of an attorney to prosecute this claim and is entitled to be compensated for
6 any costs incurred in the prosecution of this action, including without limitation, any and all costs
7 and attorney's fees.

8 **THIRD CLAIM FOR RELIEF**
9 **(Violation of Nevada RICO, § 207.400(1)(c)(1) and/or (2))**

10 60. Sassone repeats, re-alleges and incorporates the allegations set forth in the
11 preceding paragraphs of this Complaint as if fully set forth herein.

12 61. Defendants were associated in fact with one another and therefore were an
13 "enterprise" as that term is defined in NRS 207.400.

14 62. Through their association with the enterprise the defendants, and each of them,
15 conducted or participated in racketeering activity, as defined in NRS 207.390, in that they engaged
16 and continue to engage in at least two crimes related to racketeering that have the same or similar
17 pattern, intents, results, accomplices, victims or methods of commission, or are otherwise
18 interrelated by distinguishing characteristics and are not isolated incidents, through the affairs of
19 the enterprise, or, in the alternative, conducted the affairs of the enterprise through racketeering
20 activity, by:

- 21 a. creating fake Lithographs of Sassone's Works;
- 22 b. creating various websites and auction houses, advertising the Lithographs as
23 Sassone's original Lithograph Works through the auction houses;
- 24 c. forging Sassone's signature on the Lithographs;
- 25 d. selling the sham Lithographs to customers online through their various auction
26 houses.

27 63. By the actions described above herein, the Defendants have committed the
28 following crimes related to racketeering:

- a. engaging in multiple transactions involving fraud or deceit in the course of an enterprise or occupation in violation of NRS § 205.377;
- b. forgery in violation of NRS § 205.090; and
- c. obtaining possession of money or property valued at \$650 or more by false pretenses in violation of NRS § 205.380.

64. As a result of the foregoing allegations, Defendants have violated NRS 207.400-1(c)(1) and/or (2).

65. As a direct and proximate result of Defendants' pattern of racketeering activities and participation in the conduct of the enterprise, Sassone has been injured in his business or property and is entitled to treble damages in an amount to be proven at trial in excess of \$10,000, plus prejudgment interest pursuant to NRS § 207.470.

66. As a direct and proximate result of Defendants' actions, Sassone has been required to retain the services of an attorney to prosecute this claim and, pursuant to NRS § 207.470, is entitled to be compensated for any costs incurred in the prosecution of this action, including without limitation, any and all costs and attorney's fees

FOURTH CLAIM FOR RELIEF
(Violation of Nevada RICO, § 207.400(1)(j))

67. Sassone repeats, re-alleges and incorporates the allegations set forth in the preceding paragraphs of this Complaint as if fully set forth herein.

68. Defendants, and each of them, did conspire, confederate and agree with one another to conduct and participate in the operation of the aforementioned enterprise through racketeering activity, or in the alternative, to engage in racketeering activity through the affairs of the enterprise, by the acts set out hereinabove by creating fake Lithographs of Sassone's Works, creating various websites and auction houses, advertising the Lithographs as Sassone's original Lithograph Works through the auction houses, forging Sassone's signature on the Lithographs, and/or selling the fake Lithographs to customers online through their various auction houses.

69. As a result thereof, the Defendants have committed and conspired to commit the following crimes related to racketeering: (1) engaging in multiple transactions involving fraud or

1 deceit in the course of an enterprise or occupation in violation of NRS § 205.377; (2) forgery in
2 violation of NRS § 205.090; and (3) obtaining possession of money or property valued at \$650 or
3 more by means of false pretenses in violation of NRS § 205.380.

4 70. As a direct and proximate result of Defendants' conspiring, confederating and
5 agreeing as aforesaid, Sassone has been injured in his business and/or property and is entitled to
6 trebled damages in an amount to be proven at trial in excess of \$10,000, plus prejudgment interest.

7 71. As a direct and proximate result of Defendants' actions, Sassone has been required
8 to retain the services of an attorney to prosecute this claim and, pursuant to NRS § 207.470, is
9 entitled to be compensated for any costs incurred in the prosecution of this action, including
10 without limitation, any and all costs and attorney's fees.

11 **FIFTH CLAIM FOR RELIEF**
12 **(Violation of Works of Art)**

13 72. Sassone repeats, re-alleges and incorporates the allegations set forth in the
14 preceding paragraphs of this Complaint as if fully set forth herein.

15 73. Defendants Coker and Coker Jr., by virtue of their online auctions, infringed the
16 Works of Sassone by creating, publishing, displaying and offering for sale fake, unauthorized
17 Lithograph works in the State of Nevada and worldwide.

18 74. Defendants' actions of creating infringing fraudulent Lithographs of Sassone's
19 Works defaced and altered Sassone's Works while representing them as works of Sassone.

20 75. Sassone never consented to Defendants' publishing or displaying Lithographs in the
21 State of Nevada or worldwide for that matter, and thus Defendants violated NRS § 597.740.

22 76. As a direct and proximate result of Defendants' actions, Sassone is entitled to
23 damages in an amount to be proven at trial in excess of \$10,000 plus prejudgment interest.

24 77. As a direct and proximate result of Defendants' actions, Sassone has been required
25 to retain the services of an attorney to prosecute this claim and is entitled to be compensated for
26 any costs incurred in the prosecution of this action, including without limitation, any and all costs
27 and attorney's fees pursuant to NRS § 597.740(2).

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6. For such other and further relief this Court deems appropriate in the circumstances.

Dated this 21 day of October, 2016.

GENTILE CRISTALLI
MILLER ARMENI SAVARESE

DOMINIC P. GENTILE
Nevada Bar No. 1923
410 S. Rampart Blvd., Suite 420
Las Vegas, NV 89145
Telephone (702) 880-0000
Facsimile: (702) 778-9709
Attorneys for Plaintiff Marco Sassone


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DEMAND FOR JURY TRIAL

Plaintiff Sassone hereby demand that this matter be tried by a jury, pursuant to the Seventh Amendment of the Constitution of the United States, as for all triable claims.

Dated this 3 day of October, 2016.

GENTILE CRISTALLI
MILLER ARMENI SAVARESE



DOMINIC P. GENTILE
Nevada Bar No. 1923
410 S. Rampart Blvd., Suite 420
Las Vegas, NV 89145
Telephone (702) 880-0000
Facsimile: (702) 778-9709
Attorneys for Plaintiff Marco Sassone

EXHIBIT A
LIST OF INFRINGED WORKS OF ARTIST SASSONE

	Title	Description (original)	Book page #
1	Aftermath, 1968	Oil on Canvas, 71" x 71"	159
2	Alamitos Bay Marina, 1970	Oil on Canvas, 50" x 50"	181
3	Amalfi, 1972	Oil on Canvas, 50" x 54"	84
4	Barca Rossa, 1978	Oil on Canvas, 10" x 14"	279
5	Belmont Shore, 1970	Drawing, 12" x 11"	20
6	Blue Bird Canyon, 1973	Oil on Canvas, 48" x 34"	199
7	Bluebird Canyon, 1976	Oil on Canvas, 19" x 23"	209
8	Bluebird Canyon from Summit Street, 1978	Oil on Canvas, 30" x 26"	197
9	Boats at Dusk, 1969	Oil on Canvas, 40" x 54"	179
10	Canal Grande, 1978	Oil on Canvas, 32" x 30"	113
11	Canal Riflessi, 1978	Oil on Canvas, 42" x 32"	141
12	Canale con Barche, 1978	Oil on Canvas, 34" x 26"	128
13	Canale d'Inverno, 1978	Oil on Canvas, 42" x 32"	103
14	Catalina Island Marina, 1976	Oil on Canvas, 20" x 22"	167
15	Casamenti Sul Molo, 1979	Oil on Canvas, 36" x 32"	18
16	Case Veneziane, 1978	Oil on Canvas, 38" x 38"	139
17	Chiesa della Salute, 1978	Oil on Canvas, 36" x 54"	143
18	Colori sulla Baia, 1977	Oil on Canvas, 26" x 36"	265
19	Colors of Junk, 1975	Oil on Canvas, 35" x 56"	243
20	Cranes, 1975	Drawing, 9" x 14"	240
21	Darsena, 1979	Oil on Canvas, 40" x 56"	46
22	Delage, 1975	Oil on Canvas, 40" x 35"	54
23	Deposito Rottami, 1979	Watercolor, 9" x 13"	244
24	Diane, 1972	Watercolor, 28" x 20"	187
25	Eleonor's Sun Room, 1974	Oil on Canvas, 40" x 32"	219
26	Emerald Bay, 1976	Drawing, 9" x 14"	220
27	Fermata Rialto, 1978	Oil on Canvas, 32" x 30"	115
28	Firenze, 1968	Watercolor, 20" x 28"	155
29	Firenze Rosa, 1979	Oil on Canvas, 40" x 36"	151
30	Fish Cleaned 1971	Watercolor, 28" x 20"	165
31	Fisherman's Wharf, Evening, 1978	Oil on Canvas, 36" x 55"	169
32	Fishing Boats, 1978	Oil on Canvas, 10" x 12"	163
33	Flower Pots, 1978	Oil on Canvas, 20" x 22"	203
34	Gondole a San Marco, 1978	Oil on Canvas, 40" x 54"	105
35	Grand Canal, 1974	Oil on Canvas, 32" x 34"	135
36	Grand Canal, 1978	Oil on Canvas, 14" x 16"	99
37	Huntington Harbour, 1972	Oil on Canvas, 42" x 52"	160
38	Jack in the Box, 1973	Oil on Canvas, 30" x 32"	173
39	Japanese Garden, 1976	Drawing, 9" x 14"	236
40	Japanese Garden, 1976	Oil on Canvas, 24" x 20"	237
41	Jill, 1969	Oil on Canvas, 30" x 22"	176
42	Junk Island, 1979	Oil on Canvas, 50" x 72"	261
43	Junk Yard, 1975	Oil on Canvas, 62" x 50"	241
44	Laguna, 1977	Original Serigraph, 38" x 32"	191
45	Laguna with Moon, 1976	Oil on Canvas, 26" x 20"	211
46	Laguna Patio, 1975	Oil on Canvas, 33" x 30"	201
47	Laguna Terrace, 1975	Original Serigraph, 24" x 18"	227
48	Laguna Summer, 1978	Oil on Canvas, 32" x 30"	51
49	Landscape, 1977	Oil on Canvas, 38" x 55"	205
50	Mail Boxes, 1977	Oil on Canvas, 45" x 52"	257

1	Main Beach, 1974	Oil on Canvas, 40" x 32"	215
	Mar Vista Terrace, 1979	Oil on Canvas, 47" x 50"	229
2	Marina, 1976	Oil on Canvas, 30" x 30"	255
	Marina at Belmont, 1969	Oil on Canvas, 22" x 30"	177
3	Marina Riflessi, 1978	Oil on Canvas, 44" x 42"	285
	Moss Point, 1974	Oil on Canvas, 38" x 30"	217
4	Moss Point Eucalyptus, 1979	Original Serigraph, 38" x 30"	221
	Near Rialto, 1978	Oil on Canvas, 34" x 26"	129
5	North Laguna, 1978	Oil on Canvas, 26" x 36"	193
	Old Refinery, 1975	Oil on Canvas, 40" x 33"	249
6	Old Truck, 1972	Oil on Canvas, 54" x 40"	223
	Patio, 1972	Watercolor, 20" x 20"	185
7	Piazza Poggi, 1979	Oil on Canvas, 9" x 13"	149
	Piazza San Marco, 1976	Drawing, 11" x 14"	92
8	Piazzetta, 1976	Drawing, 11" x 14"	114
	Ponte dei Sospiri, 1978	Oil on Canvas, 16" x 14"	123
9	Ponte di Rialto, 1979	Oil on Canvas, 52" x 64"	117
	Ponte Rosso, 1978	Oil on Canvas, 54" x 40"	121
10	Porto Erocle, 1978	Watercolor, 9" x 13"	26
	Porto Santo Stefano, 1978	Oil on Canvas, 14" x 18"	89
11	Porto Santo Stefano, 1979	Oil on Canvas, 26" x 36"	95
	Porto Santo Stefano Tramanto, 1978	Oil on Canvas, 34" x 54"	91
12	Ragazze alla Spiaggia, 1968	Oil on Canvas, 40" x 30"	189
	Rialto Bridge -Dusk, 1979	Oil on Canvas, 52" x 64"	119
13	Rio Belvedere, 1979	Oil on Canvas, 36" x 26"	111
	Rio delle Prigioni, 1979	Oil on Canvas, 56" x 40"	125
14	Rio de la Verona, 1979	Oil on Canvas, 56" x 40"	127
	Roof Tops, 1971	Oil on Canvas, 14" x 20"	147
15	Sails at Belmont, 1967	Oil on Wood, 13" x 15"	175
	San Francisco Wharf, 1973	Oil on Canvas, 48" x 54"	42
16	San Pedro Refinery, 1975	Oil on Canvas, 45" x 33"	245
	Santa Cruz Bay, 1976	Oil on Canvas, 44" x 52"	287
17	Santa Cruz Harbor, 1977	Oil on Canvas, 38" x 54"	275
	Santa Cruz Harbor, 1978	Oil on Canvas, 36" x 55"	273
18	Santa Cruz Marina, 1978	Oil on Canvas, 36" x 54"	271
	Santa Cruz Waterfront, 1976	Oil on Canvas, 44" x 72"	269
19	Sausalito, 1978	Original Serigraph, 26" x 36"	263
	Sausalito Bay, 1975	Oil on Canvas, 40" x 56"	262
20	Sausalito Bay, 1975	Oil on Canvas, 60" x 52"	253
	Sausalito Reflections, 1975	Original Serigraph 24" x 17"	267
21	Souvenirs, 1979	Drawing, 13" x 19"	58
	Springtime Colors, 1977	Oil on Canvas, 40" x 32"	62
22	Springtime in Diablo, 1976	Oil on Canvas, 44" x 36"	171
	Studio, 1975	Oil on Canvas, 41" x 31"	231
23	Studio, 1979	Drawing, 9" x 13"	196
	Studio Vista, 1977	Original Serigraph, 26" x 32"	225
24	Studio Vista - Dusk, 1977	Oil on Canvas, 26" x 30"	224
	The Captains House, 1972	Oil on Canvas, 45" x 34"	195
25	The Flood of Florence, 1976	Original Serigraph, 14" x 9"	153
	Tree on the Bay, 1971	Watercolor, 20" x 28"	183
26	Trees in Diablo, 1977	Oil on Canvas, 47" x 38"	66
	Three-Seven-Four, 1979	Oil on Canvas, 64" x 90"	259
27	Tug Boat Reflections, 1975	Oil on Canvas, 27" x 20"	251
	Tyrrhenian Sea, 1979	Oil on Canvas, 32" x 40"	87
28	Venetian Palaces, 1978	Drawing, 9" x 13"	100

1	Venetian Palaces, 1978	Oil on Canvas, 14" x 18"	101
	Venetian Tenements, 1978	Oil on Canvas, 42" x 32"	109
2	Venetian Windows, 1974	Oil on Canvas, 46" x 50"	137
	Venezia, 1974	Oil on Canvas, 38" x 30"	133
3	Venezia II, 1974	Oil on Canvas, 38" x 30"	131
	Vermouth Bottles, 1979	Colored Pentels, 11" x 14"	93
4	View of Avalon, 1976	Oil on Canvas, 40" x 32"	38
	View from Cliff Drive, 1975	Oil on Canvas, 22" x 30"	38
5	Views from Piazzale, 1976	Drawing, 11" x 14"	145
	View of San Gorgio, 1979	Oil on Canvas, 36" x 26"	97
6	View from Temple Hills, 1979	Oil on Canvas, 36" x 26"	207
	View from the Victor Hugo, 1979	Original Serigraph, 18" x 14"	213
7	Warehouse, 1975	Oil on Canvas, 36" x 32"	247
	Winter Canal, 1978	Oil on Canvas, 42" x 32"	107
8	Yacht Harbor, 1976	Oil on Canvas, 20" x 20"	277

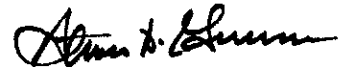
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EXHIBIT B
LIST OF WEBSITES AND AUCTION BUSINESSES
USED TO SELL SASSONE INFRINGED WORKS

Domain Name	Registered Agent	Business Name
bestauctionforyou.com	Rich Morello	Best Auction for You Inc
pinevalleyauctions.com	Rich Morello	Pine Valley Auctions.com LLC
pinevalleyauctions.com	Rich Morello	Pine Valley Auctions.com LLC
topauctionitems.com	Rich Morello	
wholesaleartauctions.com	Rich Morello	Wholesale Art Auctions
fineartonlineauctions.com	Rich Morello	Fine Art Auctions LLC
buyartauction.com	Rich Morello	Buy Art Auctions Inc
universallive.com	Martin Shape	
wilsonfineartandantiques.com	William Rhodes	Wilson Fine Art & Antiques
wilsonantiquesandart.com		Wilson Fine Art & Antiques
colonelsauctionhouse.com		Art & Jewelry Auction House dba Colonel's Auction House

EXHIBIT C
LIST OF MAJOR AUCTION WEBHOSTS
FOR SALES OF INFRINGED WORKS

1. AAC HOLDINGS LTD d/b/a ICOLLECTOR.COM - a Canadian Corporation with its principal place of business in British Columbia, Canada.
2. ICOLLECTOR.COM TECHNOLOGIES LTD - a Canadian limited liability company with its principal place of business in British Columbia, Canada.
3. LIVE AUCTIONEERS LLC d/b/a liveauctioneers.com - a New York limited liability company with its principal place of business in New York, New York.
4. AUCTION ZIP d/b/a auctionzip.com - a Pennsylvania corporation with its principal place of business in Bedford, Pennsylvania.
5. INVALUABLE LLC d/b/a invaluable.com - a Massachusetts limited liability company with its principal place of business in Boston, Massachusetts.



CLERK OF THE COURT

SUPP
GENTILE CRISTALLI
MILLER ARMENI SAVARESE
DOMINIC P. GENTILE
Nevada Bar No. 1923
Email: dgentile@gcmaslaw.com
410 S. Rampart Blvd., Suite 420
Las Vegas, NV 89145
Telephone (702) 880-0000
Facsimile (702) 778-9709
Attorneys for Plaintiff, Marco Sassone

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

MARCO SASSONE,

Plaintiff,

vs.

DARRELL T. COKER an individual,
DARRELL R. COKER, an individual,
RICHARD MORELLO an individual,
DARRYL MCCULLOUGH an individual,
AND THE JELLO'S JIGGLIN, LLC d/b/a
Postal Annex, DOES 1-10, and ROE
ENTITIES 1-10, inclusive,

Defendants.

CASE NO. A-16-742853-C
DEPT. XXVIII

SUPPLEMENT TO APPLICATION FOR
PREJUDGMENT WRIT OF
ATTACHMENT WITHOUT NOTICE

Plaintiff, MARCO SASSONE ("Marco"), by and through his counsel, the law firm of
Gentile Cristalli Miller Armeni Savarese, hereby files this Supplement to the Application for
Prejudgment Writ of Attachment Without Notice that was filed on October 6, 2016.

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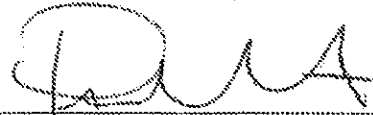
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1 This Supplement is made based on the following the Memorandum of Points and
2 Authorities and any attachments thereto; the other papers and pleadings on file herein, and any
3 oral argument the Court may permit at the hearing of this matter.

4 Dated this 18th day of October, 2016.

5 GENTILE CRISTALLI
6 MILLER ARMENI SAVARESE

7  8357
for

8 DOMINIC P. GENTILE
9 Nevada Bar No. 1923
10 410 S. Rampart Blvd., Suite 420
11 Las Vegas, NV 89145
12 Telephone (702) 880-0000
Attorneys for Plaintiff, Marco Sassone

13 **MEMORANDUM OF POINTS AND AUTHORITIES**

14 On or about October 3, 2016, Marco filed an Amended Complaint in this action against
15 the Defendants captioned above. Thereafter, on or about October 6, 2016, and pursuant to
16 Nevada Revised Statute ("NRS") 31.017(5) and 31.020, Marco filed an Application for Writ of
17 Prejudgment Attachment Without Notice and an Application for Order Shortening Time. This
18 Court held a hearing for the Writ of Prejudgment Attachment on October 13, 2016. At the
19 hearing, the Honorable Judge Israel requested additional information regarding the damages
20 Marco seeks to collect and the bond amount Marco would be willing to post.

21 Pursuant to NRS 31.030, the court shall require a written undertaking on the part of the
22 plaintiff payable in lawful money of the United States in a sum not less than the amount claimed
23 by plaintiff or the value of the property to be attached, whichever is less, *See* NRS 31.030(1). At
24 this time, Marco is seeking a minimum amount of one hundred and fifty thousand dollars
25 (\$150,000.00) in damages from the Defendants. Further, Marco is seeking to attach one property
26 located at 936 Angel Star Lane, Las Vegas, Nevada 89145, Parcel Number 138-33-414-061.
27 Currently, the property is valued at roughly \$153,000.00. *See Exhibit 1*—Greater Las Vegas
28 Association of Realtors. As such, pursuant to NRS 31.030(2), Marco will post bond in the

1 amount of \$150,000.00 for the Writ of Prejudgment Attachment.

2 Based on the foregoing, Plaintiff Marco Sassone respectfully requests that this Court
3 issue a prejudgment writ of attachment without notice in the amount of \$150,000.00 on the
4 identified real property.

5 Dated this 18th day of October, 2016.

6 GENTILE CRISTALLI
7 ~~MILLER-ARMENI SAVARESE~~

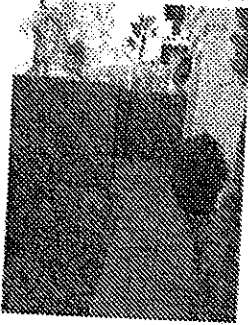
8  8857
for

9 DOMINIC P. GENTILE
10 Nevada Bar No. 1923
11 410 S. Rampart Blvd., Suite 420
12 Las Vegas, NV 89145
13 Telephone (702) 880-0000
14 Attorneys for Plaintiff, Marco Sassone
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EXHIBIT 1

EXHIBIT 1

936 Angel Star Ln, Las Vegas, NV 89145-2443, Clark County



3	1,408	1,307	\$147,000
MLS Beds	MLS Sq Ft	Lot Sq Ft	Sale Price
2	1996	TH/RH	11/14/2014
Full/Half Bath	Yr Built	Type	Sale Date

Owner Information

Owner Name:	Coker Darrell	Tax Billing Zip+4:	6617
Tax Billing Address:	3380 Camino Gardens Way	Carrier Route:	C079
Tax Billing City & State:	Las Vegas, NV	Owner Occupied:	No
Tax Billing Zip:	89146		

Location Information

Subdivision:	Starfire Estate 3	Zoning:	R-PD10
School District Name:	Clark County	Township Range Sect:	20-60-33
School District:	3200060	Block #:	S
Census Tract:	32.60	Lot #:	61

Tax Information

Parcel:	138-33-414-061	Tax Appraisal Area:	200
Tax Area:	200	% Improved:	77%
Legal Description:	STARFIRE EST 3 PLAT BOOK 67 PAGE 65 LOT 61 BLDG S SEC 33 TWP 20 RNG 60		

Assessment & Tax

Assessment Year	2016	2015	2014
Assessed Value - Total	\$42,275	\$40,410	\$29,485
Assessed Value - Land	\$9,100	\$7,700	\$5,600
Assessed Value - Improved	\$32,397	\$32,710	\$23,885
YOY Assessed Change (\$)	\$1,865	\$10,925	
YOY Assessed Change (%)	4.62%	37.05%	
Market Value - Total	\$120,786	\$115,457	\$84,242
Market Value - Land	\$26,000	\$22,000	\$16,000
Market Value - Improved	\$92,563	\$93,457	\$68,242
Tax Year	Total Tax	Change (\$)	Change (%)
2015	\$828		
2016	\$855	\$27	3.23%
2017	\$857	\$3	0.33%

Characteristics

Land Use - County:	Townhouse	Building Type:	Multi Family Townhouse
Land Use - CoreLogic:	Townhouse/Rowhouse	# of Buildings:	1
Lot Sq Ft:	1,307	Cooling Type:	Central
Lot Acres:	0.03	Heat Type:	Forced Air
Style:	Townhouse	Fireplaces:	1
Year Built:	1996	Floor Cover:	Carpet
Effective Year Built:	1996	Flooring Material:	Concrete
Stories:	2	Foundation:	Concrete
Building Sq Ft:	1,408	Patio Type:	Concrete Block Patio
Total Rooms:	5	Porch:	Patio/Porch
Bedrooms:	3	Primary Porch Sq Ft:	81
Total Baths:	3	Pool Material:	Concrete Tile

Courtesy of Michael Maggiore, Greater Las Vegas Assn of Realtors

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Property Detail

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SASS000100

Full Baths: 2
 Half Baths: 1
 Garage Sq Ft: 240
 Garage Type: Built-In
 Parking Type: Built-In Garage
 Exterior: Frame/Stucco

Sewer: Public Service
 Water: Public
 Sprinkler Type: Yes
 Quality: Fair
 Condition: Fair

Features

Feature Type	Unit	Size/Qty
Paving - Concrete	S	400
Sprinkler Minimum	U	1
Concrete Block/Slump/Sq Ft	S	228

Estimated Value

RealAVM™ (1): \$153,985 Confidence Score (2): 87
 RealAVM™ Range: \$140,126 - \$167,844 Forecast Standard Deviation (3): 9
 Value As Of: 09/30/2016

(1) RealAVM™ is a CoreLogic® derived value and should not be used in lieu of an appraisal.

(2) The Confidence Score is a measure of the extent to which sales data, property information, and comparable sales support the property valuation analysis process. The confidence score range is 60 - 100. Clear and consistent quality and quantity of data drive higher confidence scores while lower confidence scores indicate diversity in data, lower quality and quantity of data, and/or limited similarity of the subject property to comparable sales.

(3) The FSD denotes confidence in an AVM estimate and uses a consistent scale and meaning to generate a standardized confidence metric. The FSD is a statistic that measures the likely range or dispersion an AVM estimate will fall within, based on the consistency of the information available to the AVM at the time of estimation. The FSD can be used to create confidence that the true value has a statistical degree of certainty.

Listing Information

MLS Listing Number:		1490623	Current Listing Price:		\$1,100
MLS Area:		403 - NORTH WEST	Original Listing Price:		\$1,100
MLS Status:		Withdrawn	Listing Agent:		097983-Jane Garras
MLS Status Change Date:		12/19/2014	Listing Broker:		BHHS NEVADA PROPERTIES
Listing Date:		10/24/2014			
MLS Listing #	1488071	1323746	1323737	1296188	1114690
MLS Status	History	Expired	Expired	History	Expired
MLS Listing Date	10/14/2014	02/20/2013	02/20/2013	10/26/2012	01/27/2011
MLS Listing Price	\$150,000	\$129,500	\$1,095	\$89,900	\$85,000
MLS Orig Listing Price	\$150,000	\$129,500	\$1,095	\$89,900	\$85,000
MLS Close Date	11/26/2014			02/20/2013	
MLS Listing Close Price	\$147,000			\$85,500	
MLS Listing Expiration Date	04/14/2015	05/20/2013	05/20/2013	10/26/2013	07/27/2011
MLS Listing Cancellation Date	11/07/2014	05/20/2013	05/20/2013	11/05/2012	07/27/2011

Last Market Sale & Sales History

Recording Date:		11/26/2014		Seller:		Masso John	
Sale Date:		11/14/2014		Document Number:		141126003516	
Sale Price:		\$147,000		Deed Type:		Bargain & Sale Deed	
Owner Name:		Coker Darrell		Price Per Square Feet:		\$104.40	
Sale Date		11/14/2014	02/14/2013	01/23/2004	07/16/1999	07/16/1999	
Sale Price		\$147,000	\$85,500	\$162,500		\$99,000	
Nominal					Y		
Buyer Name		Coker Darrell	Masso John	Steimle Billy H	Hook Jeannie T	Hook Jeannie Y	
Seller Name		Masso John	Steimle Billy H	Hook Jeannie Y	Ramirez Froylan J	Ramirez Froylan J	
Document Number		141126003516	130220001850	40305002597	10110000862	990719001306	
Document Type		Bargain & Sale Deed	Bargain & Sale Deed	Bargain & Sale Deed	Correction Deed	B	
Sale Date		12/1995					
Sale Price		\$95,000					
Nominal							

Courtesy of Michael Maggione, Greater Las Vegas Assn of Realtors

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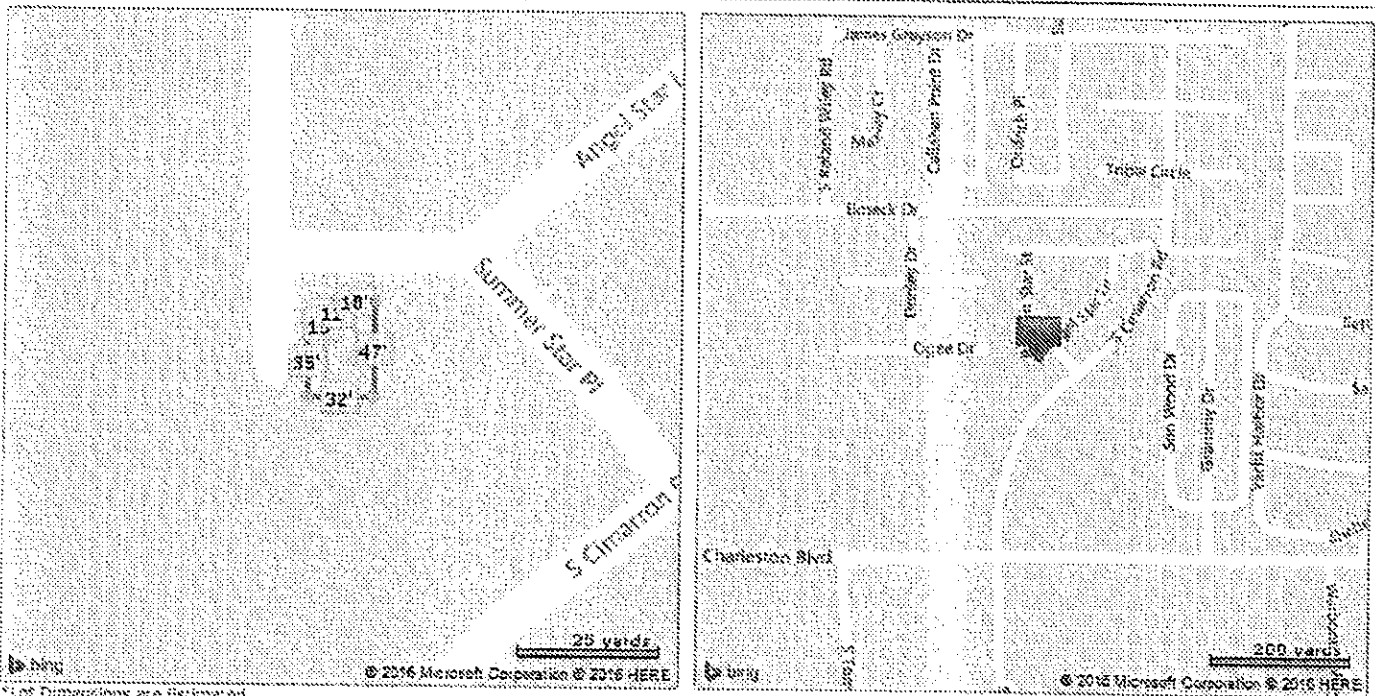
Buyer Name	Ramirez Froylan J
Seller Name	Schofield Robert L & Patricia A
Document Number	951222001219
Document Type	B

Mortgage History

Mortgage Date	11/26/2014	11/10/2005	03/05/2004	03/05/2004	04/01/2003
Mortgage Amount	\$109,500	\$180,000	\$128,000	\$32,000	\$86,600
Mortgage Lender		Pacific Cmnty Mtg	Fremont Invs & Ln	Fremont Invs & Ln	First Horizon Hm Ln Corp
Mortgage Type	Private Party Lender	Conventional	Conventional	Conventional	Conventional
Mortgage Purpose	Seller/Carry Back	Refi	Resale	Resale	Refi
Mortgage Int Rate		1	7.25		
Mortgage Int Rate Type		Adjustable Int Rate Loan	Adjustable Int Rate Loan	Fixed Rate Loan	Fixed Rate Loan
Mortgage Term		30	30	20	20

Mortgage Date	07/19/1999	12/22/1995
Mortgage Amount	\$89,000	\$93,967
Mortgage Lender	Cib Mfg	Southwest Colonial Mtg
Mortgage Type	Conventional	Fha
Mortgage Purpose	Resale	Resale
Mortgage Int Rate		
Mortgage Int Rate Type	Fixed Rate Loan	Fixed Rate Loan
Mortgage Term	30	

Property Map



Courtesy of Michael Maggione, Greater Las Vegas Assn of Realtors

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Property Detail

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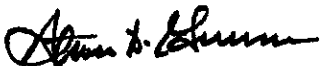
APN# 138-33-414-061

RECORDING REQUESTED BY AND RETURN TO:

DOMINIC P. GENTILE
Nevada Bar No. 1923
GENTILE CRISTALLI
MILLER ARMENI SAVARESE
410 S. Rampart Blvd., Suite 420
Las Vegas, Nevada 89145

**ORDER DIRECTING THE ISSUANCE OF A
PREJUDGMENT WRIT OF ATTACHMENT WITHOUT NOTICE**

SASS000103



CLERK OF THE COURT

ORD
GENTILE CRISTALLI
MILLER ARMENI SAVARESE
DOMINIC P. GENTILE
Nevada Bar No. 1923
Email: dgentile@gcmaslaw.com
410 S. Rampart Blvd., Suite 420
Las Vegas, NV 89145
Telephone (702) 880-0000
Facsimile (702) 778-9709
Attorneys for Plaintiff, Marco Sassone

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

MARCO SASSONE,

Plaintiff,

vs.

DARRELL T. COKER an individual,
DARRELL R. COKER, an individual,
RICHARD MORELLO an individual,
DARRYL MCCULLOUGH an individual,
AND THE JELLO'S JIGGLIN, LLC d/b/a
Postal Annex, DOES 1-10, and ROE
ENTITIES 1-10, inclusive,

Defendants.

CASE NO. A-16-742853-C
DEPT. XXVIII

**PROPOSED ORDER DIRECTING THE
ISSUANCE OF A PREJUDGMENT WRIT
OF ATTACHMENT WITHOUT NOTICE**

After consideration of Plaintiff Marco Sassone's ("Plaintiff") Application for Prejudgment Writ of Attachment Without Notice ("Application"), Supplement to Application for Prejudgment Writ of Attachment, and the accompanying Affidavit of Donald R. Dibble ("Affidavit"), all attached hereto, as well as Plaintiff's Complaint, already on file herein, the Court, being fully advised in the premises and good cause appearing therefor, makes the following findings:

1. That the above-referenced action appears to be one in which attachment without notice may be allowed because said action is brought pursuant to NRS 31.017(5).

2. The facts and reasons why these grounds exist are plaintiff's allegations and the supporting Affidavit that show Defendants Darrell T. Coker and Darrell R. Coker ("Defendants")

1 may give, assign, hypothecate, pledge, dispose of or conceal the Defendants' money or property
2 or any part thereof and the Defendants' money or property remaining in this state or that remains
3 unconcealed will be insufficient to satisfy the Plaintiff's claims.

4 3. Having reviewed Plaintiff's Complaint and the documents on file herein, it
5 appears that the Plaintiff has alleged a meritorious claim for relief.

6 4. The amount for which the attachment will issue in this action is the sum of ONE
7 HUNDRED AND FIFTY THOUSAND AND 00/100 DOLLARS (\$150,000.00).

8 5. Prior to attachment, a written undertaking on the part of Plaintiff payable in
9 lawful money of the United States in a sum of \$150,000.00, the amount claimed by Plaintiff,
10 shall be given before the Writ herein will issue.

11 6. The property to be attached and garnished herein is properly described as follows:
12 936 Angel Star Lane, Las Vegas, Nevada 89145, Parcel Number 138-33-414-061; Obligations,
13 or funds, due Defendants is the sum of ONE HUNDRED AND FIFTY THOUSAND AND
14 00/100 DOLLARS (\$150,000.00).

15 IT IS, THEREFORE, ORDERED that a Writ of Attachment in this action be issued in the
16 amount of \$150,000.00 against the property of Defendants described above.

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1 IT IS FURTHER ORDERED that Plaintiff will post a bond in the amount of \$150,000.00
2 in support of the Application for Writ of Attachment pursuant to Nevada Revised Statute
3 ("NRS") 31.050.

4 Dated this 21 day of October, 2016.

Ronald L. Israel
DISTRICT COURT JUDGE

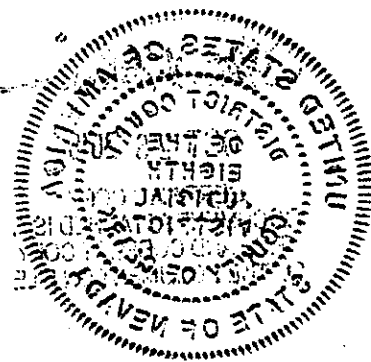
A-16-74253-C

5 Submitted by:

6 GENTILE CRISTALLI
7 MILLER-ARMENI SAVARESE

8 *[Signature]* 8357
9
10
11 DOMINIC P. GENTILE
12 Nevada Bar No. 1923
13 410 S. Rampart Blvd., Suite 420
14 Las Vegas, Nevada 89145
15 Tel: (702) 880-0000
16 Attorneys for Plaintiff, Marco Sassone

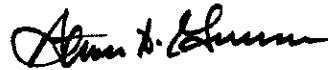
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Allen D. Levine
OCT 26 2016
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TRUE AND CORRECT COPY
OF THE DOCUMENT ON FILE



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1 **WRTA**
2 **GENTILE CRISTALLI**
3 **MILLER ARMENI SAVARESE**
4 **DOMINIC P. GENTILE**
5 Nevada Bar No. 1923
6 Email: dgentile@gemaslaw.com
7 410 S. Rampart Blvd., Suite 420
8 Las Vegas, NV 89145
9 Telephone (702) 880-0000
10 Facsimile (702) 778-9709
11 Attorneys for Plaintiff, Marco Sassone



CLERK OF THE COURT

8 **EIGHTH JUDICIAL DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10 **MARCO SASSONE,**

11 **Plaintiff,**

12 **vs.**

13 **DARRELL T. COKER** an individual,
14 **DARRELL R. COKER**, an individual,
15 **RICHARD MORELLO** an individual,
16 **DARRYL MCCULLOUGH** an individual,
17 **AND THE JELLO'S JIGGLIN, LLC d/b/a**
18 **Postal Annex, DOES 1-10, and ROE**
19 **ENTITIES 1-10, inclusive,**

20 **Defendants.**

CASE NO. A-16-742853-C
DEPT. XXVIII

AMENDED WRIT OF ATTACHMENT

19 **THE STATE OF NEVADA TO THE SHERIFF OF CLARK COUNTY, GREETINGS:**

20 YOU ARE HEREBY COMMANDED to attach and safely keep the property of
21 Defendants Darrell T. Coker and Darrell R. Coker in order to satisfy the Plaintiff's demand of
22 \$150,000.00 exclusive of accrued interest and costs.

23 The property to be attached, which is not exempt from execution and the value of which
24 does not exceed Plaintiff's demand, is described as follows:

Item	Value
936 Angel Star Lane, Las Vegas, Nevada 89145 Parcel Number: 138-33-414-061	\$150,000.00

28 **///**

1 Legal Description:

2 Parcel One (1):

3 Unit Sixty-One (61) in Building "S" of STARFIRE ESTATES III, a Townhome Subdivision,
4 as shown by map thereof on file in Book 67 of Plats, Page 85, in the Office of the County
5 Recorder of Clark County, Nevada.

6 Parcel Two (2):

7 A non-exclusive easement over and across all those areas as shown on the subdivision map
8 referred to in Parcel 1 above, designated as Common Elements and more fully defined in
9 those certain Covenant, Conditions and Restrictions recorded August 2, 1995 in Book
10 950802, as Document No. 01304.

11 If Defendants shall give you security in lawful money of the United States or by posting a
12 bond or by the undertaking of at least two sufficient sureties in an amount equal to the less of the
13 Plaintiff's demand, exclusive of interest and costs, or the value of the property levied upon, then
14 you shall accept such bond or undertaking in lieu of attaching the aforesaid property. You are
15 required to serve and return this Writ with the results of your levy endorsed thereon, and within
16 20 days from the day you receive it, return it to the Clerk of the Court with a copy to the party at
17 whose direction it was issued.

18 STEVEN D. GRIERSON, CLERK OF THE COURT

19 By: 

DEC 02 2016

20 Deputy Clerk

Regional Justice Center

SHIMAYA LADSON


200 Lewis Avenue

Las Vegas, NV 89101

21 Submitted by:

22 GENTILE CRISTALLI

23 MILLER ARMENI SAVARESE

24 
25 DOMINIC P. GENTILE

#14954

FOR:

26 Nevada Bar No. 1923

27 410 S. Rampart Blvd., Suite 420

28 Las Vegas, Nevada 89145

Tel: (702) 880-0000

Attorneys for Plaintiff Marco Sassone

1 I HEREBY CERTIFY that this is the true and correct copy of the original Writ of
2 Attachment.

JOSEPH LOMBARDO
DOUG GILLESPIE, SHERIFF, Clark County

4
5 By: Joe Lombardo
6 Deputy Clerk Sheriff Date 12/8/16

7 I HEREBY CERTIFY that I have served this date this Writ of Attachment on the ____
8 day of _____, 2016 by:

9 _____(a) taking into my possession the following described property to be held in my
10 custody until further order of this Court:

11 _____
12 _____(b) posting a copy of this Writ of Attachment upon real property set forth herein
13 by affixing a copy of this Writ to the improvement thereon or upon the property if unimproved
14 and by delivering a copy of this Writ on the ____ day of _____ 2016 to the County
Recorder to be recorded.

15 _____(c) serving on the ____ day of _____ 2016 at ____ o'clock a Writ of
16 Garnishment in aid of this Writ of Attachment on _____, Clark County, Nevada.
A true and correct copy of said Writ of Garnishment is attached hereto.

17 _____(d) returning this Writ of Attachment unsatisfied.
18

19 DOUG GILLESPIE, SHERIFF, Clark County

20
21 By: _____
22 Deputy Clerk Date

**OFFICE OF THE SHERIFF
CLARK COUNTY DETENTION
CIVIL PROCESS SECTION**

MARCO SASSONE

PLAINTIFF

Vs

DARRELL T COKER; DARRELL R COKER, et
al.,

DEFENDANT

CASE No. A-16-742853-C

SHERIFF CIVIL NO.: 16008229

**AFFIDAVIT OF POSTING OF WRIT OF
ATTACHMENT**

STATE OF NEVADA

COUNTY OF CLARK

ss:

JOSEPH LOMBARDO, being first duly sworn, deposes and says: That he/she is, and was at all times hereinafter mentioned, a duly appointed, qualified and acting Deputy Sheriff in and for the County of Clark, State of Nevada, a citizen of the United States, over the age of twenty-one years and not a party to, nor interested in, the above entitled action; that on **12/8/2016**, at the hour of **1:00 PM**, affiant as such Deputy Sheriff posted copy/copies of **WRIT OF ATTACHMENT** issued in the above entitled action at **936 ANGEL STAR LANE LAS VEGAS, NV 89145** within the County of Clark, State of Nevada, said copy/copies of **WRIT OF ATTACHMENT**

DATED December 12, 2016.

SERVICE FEES - \$39.00

Joseph M. Lombardo, Sheriff

SUBSCRIBED AND SWORN to me before me this

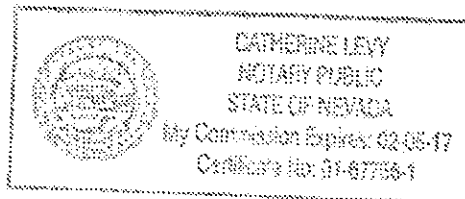
12th day of December, 2016.

NOTARY PUBLIC in and for said County & State

By:

JOSEPH LOMBARDO

Deputy Sheriff



PO Box 553220 Las Vegas NV 89155-3220 (702) 455-5400

SASS000112