

**Brandie Davies**

---

**From:** Benjamin Wang <bwang@bwanglaw.com>  
**Sent:** Thursday, June 23, 2016 11:04 AM  
**To:** David Jacobs  
**Cc:** Jeremy Bergstrom; Brandie Davies  
**Subject:** Re: Ng

Hi Jeremy,

Go ahead to obtain the reports.

Thank you for updating us on the progress of the collection activities. I am actually in Las Vegas for a conference until Saturday.

Best regards,

Benjamin Wang  
Attorney at Law  
Benjamin Beijing Wang, PC  
243 West 10<sup>th</sup> Ave  
Eugene, OR 97401  
Phone: (541)484-1811  
Fax: (541)431-3470  
www.bwanglaw.com

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On Jun 23, 2016, at 10:37 AM, David Jacobs <djacobs@luvaascobb.com> wrote:

Thanks for the update Jeremy. I'll let Beijing make the call on the costs, but I'm sure that will be fine. Beijing??

Questions: 1) Any thoughts yet on trying to track down funds held by casinos and/or locating Ng for a debtor exam? 2) Any chance he owns a valuable car in NV?

I'm sure you're on it. Keep us posted.

**From:** Jeremy Bergstrom [mailto:jbergstrom@jbergstromlaw.com]  
**Sent:** Thursday, June 23, 2016 8:57 AM  
**To:** David Jacobs <djacobs@luvaascobb.com>  
**Subject:** FW: Ng

David,

I spoke with Ivan Baric. I also had some current research done to identify possible property ownership and corporate ownership. The results of that research are in the e-mail below.

The complaint filed against Ng identified two properties as possibly being owned by Ng. Those properties were Angelita View and Raspberry Hill. You will find Raspberry Hill identified below but you will not find Angelita View below. The Angelita View property was sold by Ng in October 2015.

It is likely that the first two properties identified below, specifically Raspberry Hill and Elaine Dr., are owned by Ng. It is unknown whether those properties are encumbered by liens.

It is less likely that the second two properties below, specifically Sanderling Circle and Hammock Dunes, are owned by Ng. In the event they are, it is unknown whether the properties are encumbered by liens.

Before we initiate execution sales on any of the four properties, we should first attempt to confirm ownership and encumbrances against each property. We can obtain RIPR reports from First American Title for \$85 that will contain ownership history, all consensual and non-consensual liens attached to the properties, any assignments of those liens and generally everything else recorded against the properties. It will not give balances on the liens, but we should be able to guesstimate fairly well and use the estimated numbers to determine whether execution sales make sense. As far as confirmation of ownership, these reports will not provide an SSN to cross-reference so they will not conclusively confirm whether the Ng that owns these four properties is our Ng, but they should provide enough information to make a reasonably strong conclusion.

Are the \$85 X 4 costs to obtain these reports authorized? Assuming at least one of these four properties is believed to be our Ng and unencumbered by liens, we will move for an ex parte writ of attachment and TRO preventing Ng from selling the property. We will file and record a lis pendens as part of that. After the property is enjoined, we will then begin execution sale proceedings.

Please let me know on the costs.

Jeremy T. Bergstrom, Esq.  
<image001.jpg>  
9555 S. Eastern Avenue, Suite 200  
Las Vegas, NV 89123  
Phone: (702) 333-0007  
Fax: (702) 333-1524  
[jbergstrom@jbergstromlaw.com](mailto:jbergstrom@jbergstromlaw.com)

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Arizona • California • Illinois • Massachusetts • Nevada • New York

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*A portion of this Firm's practice may be considered debt collection and any information obtained may be used for that purpose.*

From: Maggie Bardis [mailto:mbardis@jbergstromlaw.com]  
Sent: Thursday, June 23, 2016 5:15 AM  
To: Jeremy Bergstrom <jbergstrom@jbergstromlaw.com>  
Subject: Ng

I went to the Clark County Assessor's website and did a real property search by owner's name (<http://www.clarkcountynv.gov/assessor/Pages/PropertyRecords.aspx?H=redrock&P=assrrealprop/owner.aspx>).

A search for "ONN NG," "WAH ONN," "ONN WAH," "NG WAH," "KRIS NG," "KRIS ONN," "KRIS WAH," "WAH KRIS," "ONN KRIS," or "NG KRIS" got no hits.

A search for "WAH NG" and "NG ONN" showed 2 properties in Clark County where 'Onn Ng Wah' is the primary owner. I clicked on each APN to obtain current owner information. I also took that APN and cross-referenced the property information on Title365's website.

The following 2 properties were found on the Assessor's website:

- 2059 Raspberry Hill Rd, Las Vegas, NV 89142
- 1711 Elaine Dr, Las Vegas, NV 89142

For the Raspberry Hill property, Onn Ng Wah uses the mailing address 10587 Fabrica St, Las Vegas, NV 89141. A search on that property shows that the current owner is 'Church Catholic Mission St Sharb.' A search on the NV SOS website for any variation of 'Church Catholic Mission St Sharb' got no hits.

For the Elaine Dr property, Onn Ng Wah uses the mailing address 6731 Fort Grey Ct, Las Vegas, NV 89139. A search on that property shows that the current owner is 'Vegas International LLC.' A search on the NV SOS website for 'Vegas International LLC' shows that Ivan Baric is the managing officer and non-commercial registered agent for this entity located at 6731 Fort Grey Ct, Las Vegas.

A search for "NG WAH" showed 2 properties in Clark County where 'Ng Wah Hon Trs' is the secondary owner. I clicked on each APN to obtain current owner information, and cross-referenced the property information on Title365's website.

The following 2 properties were found on the Assessor's website:

- 4330 Sanderling Cir Unit 84, Las Vegas, NV 89142
- 11 Hammock Dunes Ct, Henderson, NV 89052

Both properties are quit claimed to WAH HON NG AS TRUSTEE OF THE TIDA TRUST.

For the Sanderling property, the owners use the mailing address 2 Kittanset Loop, Henderson, NV 89052. A search on that property shows that the current owner for this property is ADIT Trust. A search on the NV SOS website for 'ADIT Trust' got no hits.

For the Hammock Dunes, the owners mailing address is 6162 Spring Mountain Rd, Las Vegas, NV 89146. A search on that property shows that it is the business address for Nevada Real Estate Corp. A search on the NV SOS website for 'Nevada Real Estate Corp' shows that Judith Sullivan is the managing officer and non-commercial registered agent for this entity located at 3512 Wynn Rd, Las Vegas.

A manufactured housing search by owner name did not get any hits under any variation of Kris/Onn/Wah/Ng.

A name search on the NV SOS website for officer name, registered agent name, and associated business name, did not get any hits under any variation of Kris/Onn/Wah/Ng.

**Maggie Bardis**

**Bergstrom Law, Ltd.**

9555 S. Eastern Avenue, Suite 200

Las Vegas, NV 89123

Phone: (702) 333-0007 ext. 102

Fax: (702) 333-1524

[mbardis@ibergstromlaw.com](mailto:mbardis@ibergstromlaw.com)

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*A portion of this Firm's practice may be considered debt collection and any information obtained may be used for that purpose.*



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Eugene, OR 97401  
Phone: (541) 484-9292  
FAX: (541) 343-1206  
[www.luvaascobb.com](http://www.luvaascobb.com)

From: Jeremy Bergstrom [<mailto:jbergstrom@jbergstromlaw.com>]  
Sent: Tuesday, January 17, 2017 3:03 PM  
To: David Jacobs <[djacobs@luvaascobb.com](mailto:djacobs@luvaascobb.com)>  
Subject: Ng judgment collection

David,

The legal process to cause forced execution sales of the real property located at 2059 Raspberry Hill Road in Las Vegas and 1711 Elaine Drive in Las Vegas is underway. Our research and asset detection efforts have identified those two assets are the most viable recovery targets and the most likely to lead to satisfaction of the judgment.

We will continue forward with these execution sales and keep you updated along the way. Apologies for not keeping you apprised of the status previously. We'll be sure to do that and work together going forward towards the common goal of seeing this judgment satisfied.

Jeremy T. Bergstrom, Esq.

BERGSTROM LAW, LTD.

9555 S. Eastern Avenue, Suite 200  
Las Vegas, NV 89123  
Phone: (702) 333-0007  
Fax: (702) 333-1524  
[jbergstrom@jbergstromlaw.com](mailto:jbergstrom@jbergstromlaw.com)

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---

*A portion of this Firm's practice may be considered debt collection and any information obtained may be used for that purpose.*

# STATE BAR OF NEVADA



August 15, 2017

Jeremy T. Bergstrom, Esq.  
9555 S. Eastern Avenue, Ste. 200  
Las Vegas, NV 89123

3100 W. Charleston Blvd.  
Suite 100  
Las Vegas, NV 89102  
phone 702.382.2200  
toll free 800.254.2797  
fax 702.385.2878

9456 Double R Blvd., Ste. B  
Reno, NV 89521-5977  
phone 775.329.4100  
fax 775.329.0522

[www.nvbar.org](http://www.nvbar.org)

RE: Grievance File #OBC17-1050 / David Jacobs, Esq.

Dear Mr. Bergstrom:

The Office of Bar Counsel has received the attached correspondence from attorney David Jacobs.

Please provide your written input to the specific issues raised. A grievance file has not been opened at this time. However, should a file be opened, you will be notified and given a full opportunity to respond.

**With your response, please provide the Office of Bar Counsel with copies of, all documents and exhibits.**

Please give this matter your earliest attention. Your response shall be calendared for two (2) weeks from the date of this letter. If you wish, you may send your response to the State Bar via email to: [jessicap@nvbar.org](mailto:jessicap@nvbar.org).

Sincerely,

Phillip J. Pattee  
Assistant Bar Counsel

PJP/jp

Enclosure

# STATE BAR OF NEVADA

September 13, 2017

**Regular and Certified Mail: 7016 1970 0000 9931 2371**

Jeremy T. Bergstrom, Esq.  
9555 S. Eastern Avenue, Ste. 200  
Las Vegas, NV 89123

RE: Grievance #OBC17-1050 / David Jacobs, Esq.

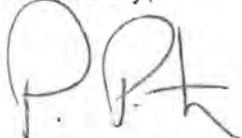
Dear Mr. Bergstrom:

The Office of Bar Counsel has received no response to our letter dated August 15, 2017, a copy of which is enclosed.

If no response is received from you, a grievance file will be opened and the complaint will be referred to the screening panel of the Southern Nevada Disciplinary Board, which will consider the complaint on the assumption that all of the allegations made in the letter of complaint are true. In addition, the panel will be asked to consider your failure to respond as a failure to cooperate with the State Bar in its efforts to enforce Rules of Professional Conduct, which will be considered as a separate disciplinary violation pursuant to RPC 8.1(b) (Bar Admission and Disciplinary Matters).

**Your response shall be calendared for September 27, 2017.**

Sincerely,



Phillip J. Pattee  
Assistant Bar Counsel

PJP/jp

Enclosure



3100 W. Charleston Blvd.  
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fax 775.329.0522

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**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front-if space permits.

1. Article Addressed to:

Bergstrom Law, Ltd.  
Jeremy T. Bergstrom, Esq.  
9555 S. Eastern Avenue, Ste. 200  
Las Vegas, NV 89123

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X

*[Signature]*

☐ Adult  
☐ Addressee

B. Received by (Printed Name)

*M. J. Smith*

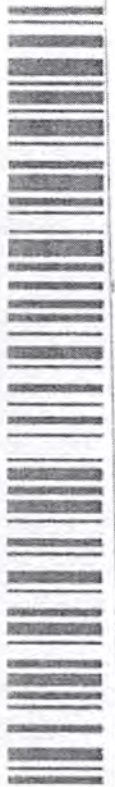
C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes ☒ No

**RECEIVED BY**

SEP 19 2017

STATE BAR OF NEVADA



9590 9402 2008 6123 3755 55

2. Article Number (Transfer from service label)

Mail  
Mail Restricted Delivery

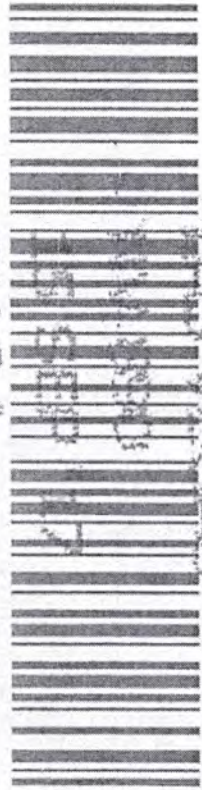
- |  |   |
|--|---|
| <input type="checkbox"/> Adult Signature                         | <input type="checkbox"/> Priority Mail Express®                     |
| <input type="checkbox"/> Adult Signature Restricted Delivery     | <input type="checkbox"/> Registered Mail                            |
| <input type="checkbox"/> Certified Mail®                         | <input type="checkbox"/> Registered Mail Restricted Delivery        |
| <input type="checkbox"/> Certified Mail Restricted Delivery      | <input type="checkbox"/> Return Receipt for Merchandise             |
| <input type="checkbox"/> Collect on Delivery                     | <input type="checkbox"/> Signature Confirmation™                    |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery |

Postnet PSN 7530-02-000-9053

Domestic Return Receipt



USPS TRACKING #



9590 9402 2008 6123 3755 55

United States  
Postal Service

First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4® in this box •

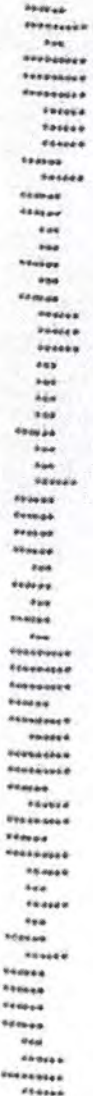


STATE BAR OF NEVADA  
3100 W. Charleston Blvd Ste 100  
Las Vegas, NV 89102  
[www.nvbar.org](http://www.nvbar.org)

Attn: Jessica Poni

DBC17-1050

2-189225



# STATE BAR OF NEVADA



November 16, 2017

**SENT VIA REGULAR & CERTIFIED MAIL: 7016 1970 0000 9931 1657**

Jeremy T. Bergstrom, Esq.  
Bergstrom Law, Ltd.  
9555 S. Eastern Ave., Suite 200  
Las Vegas, NV 89123

3100 W. Charleston Blvd.  
Suite 100  
Las Vegas, NV 89102  
phone 702.382.2200  
toll free 800.254.2797  
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9456 Double R Blvd., Ste. B  
Reno, NV 89521-5977  
phone 775.329.4100  
fax 775.329.0522

[www.nvbar.org](http://www.nvbar.org)

RE: Grievance File No. SG17-1050/ David A. Jacobs, Esq.

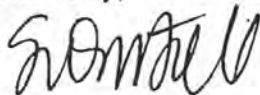
Dear Bergstrom:

The Office of Bar Counsel has received no response to our letters of August 15, 2017 and September 13, 2017, copies of which are enclosed. This matter has been reviewed for investigations. I am the investigator assigned to this case and may be contacted at [suzannef@nvbar.org](mailto:suzannef@nvbar.org) or at my direct telephone line 702-317-4612.

If no response is received from you, this grievance file will be referred to the Screening Panel of the Southern Nevada Disciplinary Board, which will consider the complaint on the assumption that all of the allegations made in the letter of complaint are true. In addition, the panel will be asked to consider your failure to respond as a failure to cooperate with the State Bar in its efforts to enforce Rules of Professional Conduct, which will be considered as a separate disciplinary violation pursuant to RPC 8.1(b) (Bar admission and disciplinary matters).

**Please provide the requested information no later than November 26, 2017.**

Sincerely,



Suzanne M. Farrell  
Paralegal / Investigator  
Office of Bar Counsel

/sf  
Enclosures



**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Jeremy T. Bergstrom, Esq.  
Bergstrom Law, Ltd.  
9555 S. Eastern Ave., Suite 200  
Las Vegas, NV 89123

0BC17-1050

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

☒ X

*[Handwritten Signature]*

☐ Agent  
☐ Addressee

B. Received by (Printed Name)

*M. Bergstrom*

C. Date of Delivery

D. Is delivery address different from item 1?

If YES, enter delivery address below:

NOV 20 2017

STATE BAR OF NEVADA

3. Service Type

- |   |   |
|---|---|
| <input type="checkbox"/> Certified Mail | <input type="checkbox"/> Express Mail                   |
| <input type="checkbox"/> Registered     | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Insured Mail   | <input type="checkbox"/> C.O.D.                         |

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number  
(Transfer from service label)

7016 1970 0000 9931 1657

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

**Brandie Davies**

*Bergstrom firm email DAS*  
*Bergstrom associate*  
*Bergstrom paralegal*  
From: David Jacobs  
Sent: Tuesday, January 17, 2017 12:22 PM  
To: info@jbergstromlaw.com; Jeremy Bergstrom; jhendrickson@bergstromlaw.com;  
mbardis@jbergstromlaw.com  
Cc: Brandie Davies  
Subject: YOUR CLIENT NEEDS IMMEDIATE RESPONSE [Neilson Lee]  
Attachments: FW: Lee v. Ng  
Importance: *previous emails DAS* High

Please see below and attached. I have now called two more times since the New Year and been assured that Jeremy would contact me and provide a status report. If I do not receive a response by Friday I will contact the Nevada State Bar. I would obviously prefer to avoid that. But the complete lack of communication and apparent misinformation is not acceptable. If Jeremy is not available, I would appreciate a call from another attorney so I can discuss my concerns. Thank you.

**LUVAAS / COBB**

David A. Jacobs  
777 High Street, Suite 300  
Eugene, OR 97401  
Phone: (541) 484-9292  
Fax: (541) 343-1206  
[www.luvaascobb.com](http://www.luvaascobb.com)

From: David Jacobs  
Sent: Wednesday, November 23, 2016 2:08 PM  
To: 'info@jbergstromlaw.com' <info@jbergstromlaw.com>; 'Jeremy Bergstrom' <jbergstrom@jbergstromlaw.com>; 'kbergstrom@nslaw.net' <kbergstrom@nslaw.net>; 'jhendrickson@bergstromlaw.com' <jhendrickson@bergstromlaw.com>; 'mbardis@jbergstromlaw.com' <mbardis@jbergstromlaw.com>  
Cc: Brandie Davies <bdavies@luvaascobb.com>  
Subject: concerned client, need immediate response  
Importance: High

I referred a matter to your firm for collection back in March. The client's name is Neilson Lee; adverse judgment-debtor is Wah Onn Ng aka Kris Wai Onn Ng or Ng Wah Onn. A \$5000 retainer was paid. I have been trying to get a detailed update from Jeremy for some time now without success. See attached. In addition to emails I have called several times; to Jeremy and Maggie Bardis. When I last spoke with Jeremy he said that writs of execution had been issued and he was waiting for sheriff's sales. I was unable to confirm that information. I am very concerned with the lack of information and communication. Please respond asap.

Thank you.

**LUVAAS / COBB**

David A. Jacobs

*previous emails DAS*  
SBN Exhibit 3 - Page 025



777 High Street, Suite 300  
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**Brandie Davies**

---

*Register provided*

From: David Jacobs  
Sent: Thursday, October 20, 2016 2:24 PM  
To: Jeremy Bergstrom  
Cc: mbardis@jbergstromlaw.com; Brandie Davies; Monica D. LaRosa  
Subject: FW: Lee v. Ng  
Attachments: FW: Ng; Re: Ng; RE: Ng; FW: Neilson Lee; FW: Neilson Lee  
Importance: High

*copied of previous email (DAS)*

Jeremy: Since I haven't heard back from you to my request below I had my paralegal check the case register on the judgment you domesticated for our client. It shows no activity. I'm not sure if the writs you told me that you had obtained should show up there, or if there's another case(s) that they are filed under. Please provide a full update and clarification of the status of your collection efforts as previously requested at your earliest convenience. The lack of information coming from your end is becoming a concern for our client.

Thanks.

**LUVAAS / COBB**

David A. Jacobs  
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From: David Jacobs  
Sent: Tuesday, October 11, 2016 10:14 AM  
To: 'Jeremy Bergstrom' <jbergstrom@jbergstromlaw.com>  
Cc: Brandie Davies <bdavies@luvaascobb.com>  
Subject: FW: Lee v. Ng  
Importance: High

*23191*

Jeremy, thanks for the update. I need to let the client know where things stand. Looking back at your 6/32 email you referenced 4 properties. Were you able to confirm that just the 2 were owned by Ng without the referenced RIPR reports? (Elain Dr and Raspberry Hill) Also, you mentioned you had writs on the two properties, did you also get the TRO and file the lis pendens as indicated was your plan in your email? Finally, could you clarify when you would expect the sheriff to order the sale?

Thanks again for your help and I'll look forward to your response.

**LUVAAS / COBB**

David A. Jacobs  
777 High Street, Suite 300



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Phone: (541) 484-9292  
FAX: (541) 343-1206  
[www.luvaascobb.com](http://www.luvaascobb.com)

From: David Jacobs  
Sent: Monday, September 26, 2016 5:15 PM  
To: 'Jeremy Bergstrom' <[jbergstrom@jbergstromlaw.com](mailto:jbergstrom@jbergstromlaw.com)>  
Cc: 'mbardis@jbergstromlaw.com' <[mbardis@jbergstromlaw.com](mailto:mbardis@jbergstromlaw.com)>; Brandie Davies <[bdavies@luvaascobb.com](mailto:bdavies@luvaascobb.com)>  
Subject: Lee v. Ng  
Importance: High

Jeremy:

Please see the attached. I do not believe we have heard from you since your email of June 23. Beijing gave you authority for the cost of the noted reports. I've sent you 3 emails with no response.

Please let us know what the status of your efforts is at your earliest convenience.

**LUVAAS / COBB**

David A. Jacobs  
777 High Street, Suite 300  
Eugene, OR 97401  
Phone: (541) 484-9292  
FAX: (541) 343-1206  
[www.luvaascobb.com](http://www.luvaascobb.com)

**Brandie Davies**

---

From: David Jacobs  
Sent: Tuesday, October 11, 2016 10:04 AM  
To: Brandie Davies  
Subject: FW: Lee v. Ng  
Attachments: FW: Ng; Re: Ng; RE: Ng; FW: Neilson Lee; FW: Neilson Lee  
  
Importance: High

MY ASSISTANT  
FLY  
11-11-16

I finally connected with Jeremy. He says he has 2 writs pending on the houses owned by Ng and will let us know when the sheriff issues a sale date. Let's calendar for 30 days.

---

From: David Jacobs  
Sent: Monday, September 26, 2016 5:15 PM  
To: 'Jeremy Bergstrom' <jbergstrom@jbergstromlaw.com>  
Cc: 'mbardis@jbergstromlaw.com' <mbardis@jbergstromlaw.com>; Brandie Davies <bdavies@luvaascobb.com>  
Subject: Lee v. Ng  
Importance: High

Jeremy:

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**LUVAAS / COBB**

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Phone: (541) 484-9292  
FAX: (541) 343-1206  
[www.luvaascobb.com](http://www.luvaascobb.com)



**Brandie Davies**

From: David Jacobs  
Sent: Friday, February 03, 2017 11:11 AM  
To: Jeremy Bergstrom; info@jbergstromlaw.com; mbardis@jbergstromlaw.com; jhendrickson@bergstromlaw.com  
Cc: Brandie Davies  
Subject: FW: Ng judgment collection [NEEDS IMMEDIATE ATTENTION!!]  
Importance: High

*Firm* *pro-legal*  
*associate*

Jeremy, please respond. We checked the docket again on the judgment you filed and there has been no activity since it was filed. I need an immediate and detailed response as to where you are with the "forced execution sales" that you have stated are "underway," including copies of your filings. This will be my last follow up before I contact the bar - I really do not want to do that, but you are not giving me any option at this point.

**LUVAAS / COBB**

David A. Jacobs  
777 High Street, Suite 300  
Eugene, OR 97401  
Phone: (541) 484-9292  
FAX: (541) 343-1206  
[www.luvaascobb.com](http://www.luvaascobb.com)

From: David Jacobs  
Sent: Wednesday, January 18, 2017 5:56 PM  
To: 'Jeremy Bergstrom' <jbergstrom@jbergstromlaw.com>  
Cc: Brandie Davies <bdavies@luvaascobb.com>  
Subject: FW: Ng judgment collection

Jeremy, please respond.

From: David Jacobs  
Sent: Tuesday, January 17, 2017 3:07 PM  
To: 'Jeremy Bergstrom' <jbergstrom@jbergstromlaw.com>  
Cc: Brandie Davies <bdavies@luvaascobb.com>  
Subject: RE: Ng judgment collection

*Bergstrom called with assurances noted above. (D)*

Thanks Jeremy. Have you actually filed for writs of execution (or the like)? Could you let me know the estimated timeline?

**LUVAAS / COBB**

David A. Jacobs

777 High Street, Suite 300  
Eugene, OR 97401  
Phone: (541) 484-9292  
FAX: (541) 343-1206  
[www.luvaascobb.com](http://www.luvaascobb.com)

From: Jeremy Bergstrom [<mailto:jbergstrom@jbergstromlaw.com>]  
Sent: Tuesday, January 17, 2017 3:03 PM  
To: David Jacobs <[djacobs@luvaascobb.com](mailto:djacobs@luvaascobb.com)>  
Subject: Ng judgment collection

David,

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We will continue forward with these execution sales and keep you updated along the way. Apologies for not keeping you apprised of the status previously. We'll be sure to do that and work together going forward towards the common goal of seeing this judgment satisfied.

Jeremy T. Bergstrom, Esq.

**BERGSTROM LAW, LTD.**

9555 S. Eastern Avenue, Suite 200  
Las Vegas, NV 89123  
Phone: (702) 333-0007  
Fax: (702) 333-1524  
[jbergstrom@jbergstromlaw.com](mailto:jbergstrom@jbergstromlaw.com)

---

Arizona • California • Illinois • Nevada • New York

---

*A portion of this Firm's practice may be considered debt collection and any information obtained may be used for that purpose.*



**Brandie Davies**

---

**From:** David Jacobs  
**Sent:** Monday, May 02, 2016 1:41 PM  
**To:** Jeremy Bergstrom  
**Cc:** Brandie Davies  
**Subject:** FW: Lee v. Ng (Oregon lawsuit, LV collection)

Jeremy: Please see below and respond. Thanks.

**From:** David Jacobs  
**Sent:** Thursday, April 28, 2016 10:00 AM  
**To:** 'Jeremy Bergstrom' <jbergstrom@jbergstromlaw.com>  
**Cc:** Brandie Davies <bdavies@luvaascobb.com>  
**Subject:** Lee v. Ng (Oregon lawsuit, LV collection)

Jeremy: see below and let me know.

**From:** David Jacobs  
**Sent:** Tuesday, April 26, 2016 10:42 AM  
**To:** 'Jeremy Bergstrom' <jbergstrom@jbergstromlaw.com>  
**Cc:** Brandie Davies <bdavies@luvaascobb.com>  
**Subject:** FW: Kris Las Vegas lawsuit

Jeremy: see the below email exchange with the guy I told you about. Do you want to call him? If so, I'll tell him to expect a call. I'm still not certain what his end game is, but he does have info on our debtor and seems to want to help. Of course, I'm sure he's got his self-interest in sight.

**From:** [baricrealestate@gmail.com](mailto:baricrealestate@gmail.com) [mailto:[baricrealestate@gmail.com](mailto:baricrealestate@gmail.com)]  
**Sent:** Tuesday, April 26, 2016 10:30 AM  
**To:** David Jacobs <djacobs@luvaascobb.com>  
**Subject:** Re: Kris Las Vegas lawsuit

Ok , Great .  
Can I talk to him David ?

Ivan Baric ,  
[www.BaricRealEstate.com](http://www.BaricRealEstate.com) ,  
702 232 0233

Dalmatinac Barić Doo  
095 5766 885

On 26 Apr 2016, at 09:47, David Jacobs <djacobs@luvaascobb.com> wrote:

I have local counsel who is pursuing case in LV.

*Sent from my Verizon Wireless 4G LTE DROID*  
On Apr 25, 2016 6:49 PM, [baricrealestate@gmail.com](mailto:baricrealestate@gmail.com) wrote:

Hello David .  
Long time no word from you .  
Did you give up from bringing your lawsuit against Kris to Vegas ?

Ivan Baric ,  
[www.BaricRealEstate.com](http://www.BaricRealEstate.com) ,  
702 232 0233

Dalmatinac Barić Doo  
095 5766 885

## IN THE CIRCUIT COURT OF THE STATE OF OREGON FOR LANE COUNTY

NEILSON LEE,

Plaintiff,

vs.

WAH ONN NG, aka KRIS WAH ONN NG  
and NG WAH ONN,

Defendant.

Case No. 15CV33982

GENERAL JUDGMENT BY DEFAULT  
AGAINST DEFENDANT

This matter came before the court on plaintiff's motion for entry of general judgment against defendant, and the court, having previously entered an order of default against defendant on the 5<sup>th</sup> day of February, 2016, and being otherwise fully advised;

NOW, THEREFORE, JUDGMENT IS HEREBY ENTERED in favor of plaintiff and against defendant as follows:

## MONEY AWARD

Judgment Creditor: Neilson Lee

Judgment Creditor's Attorneys: David A. Jacobs,  
Luvaas Cobb  
777 High Street, Suite 300  
Eugene, OR 97440-2747

Judgment Debtor: Wah Onn Ng, aka Kris Wah Onn Ng and Ng Wah Onn  
10587 Fabrica Street  
Las Vegas, NV 89141

Amount of Judgment: \$515,000.00

Prejudgment Interest: \$28,699.74

EXHIBIT 4

WITNESS:

DATE:

BRITTANY J. CASTREJON, CCR NO. 926

LUVAAS / COBB  
ATTORNEYS AT LAW

777 High Street, Suite 300  
Post Office Box 110747  
Eugene, OR 97440-0747  
Phone 541-344-4291  
Fax 541-344-4120

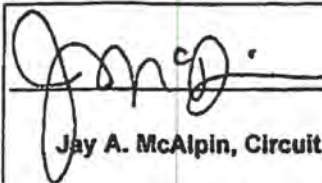
PAGE 1 - GENERAL JUDGMENT BY DEFAULT AGAINST DEFENDANT



1 Postjudgment Interest: 9% from date of judgment until paid.

2 Costs and Disbursements: \$891.00

6 Signed: 2/28/2018 03:44 PM



Jay A. McAlpin, Circuit Court Judge

9 Submitted by:  
David A. Jacobs, OSB No. 942202  
Luvaas Cobb  
777 High Street, Suite 300  
Eugene, OR 97401  
E-mail: djacobs@luvaascobb.com  
541-484-9292 - phone  
541-343-1206 - fax

14 Benjamin Beijing Wang, OSB No. 983664  
Co-Counsel  
BENJAMIN BEIJING WANG PC  
P.O. Box 50925  
Eugene, OR 97405  
E-mail: bwang@bwanglaw.com  
541-484-1811 (phone)  
541-431-3470 (fax)

18 Of Attorneys for Plaintiff

**LUVAAS / COBB**  
777 High Street, Suite 300  
Eugene, OR 97401  
Phone: 541-484-9292  
Fax: 541-343-1206

PAGE 2 - GENERAL JUDGMENT BY DEFAULT AGAINST DEFENDANT



## DISTRICT COURT CIVIL COVER SHEET

Clark County, Nevada

Case No. \_\_\_\_\_

(Assigned by Clerk's Office)

A- 16- 7 34246- F  
XXX**I. Party Information** (provide both home and mailing addresses if different)

Plaintiff(s) (name/address/phone):

**NEILSON LEE**

c/o LUVAAS COBB

777 High Street, Suite 300

Eugene, OR 97440

Attorney (name/address/phone):

**Jeremy T. Bergstrom, Esq.****BERGSTROM LAW, LTD.**

9555 S. Eastern Avenue, Suite 200

Las Vegas, Nevada 89123

(702) 333-0007

Defendant(s) (name/address/phone):

**WAH ONN NG,****aka KRIS WAH ONN NG and NG WAH ONN**

10587 FABRICA STREET

LAS VEGAS, NV 89141

Attorney (name/address/phone):

**II. Nature of Controversy** (please select the one most applicable filing type below)**Civil Cases Filing Types**

Real Property	Torts	
<b>Landlord/Tenant</b> <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Other Landlord/Tenant <b>Title to Property</b> <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Other Title to Property <b>Other Real Property</b> <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property	<b>Negligence</b> <input type="checkbox"/> Auto <input type="checkbox"/> Premises Liability <input type="checkbox"/> Other <b>Malpractice</b> <input type="checkbox"/> Medical/Dental <input type="checkbox"/> Legal <input type="checkbox"/> Accounting <input type="checkbox"/> Other Malpractice	<b>Other Torts</b> <input type="checkbox"/> Product Liability <input type="checkbox"/> Intentional Misconduct <input type="checkbox"/> Employment Torts <input type="checkbox"/> Insurance <input type="checkbox"/> Other Tort
Probate	Construction Defect & Contract	Judicial Review/Appeal
<b>Probate</b> (select case type and estate value) <input type="checkbox"/> Summary Administration <input type="checkbox"/> General Administration <input type="checkbox"/> Special Administration <input type="checkbox"/> Set Aside <input type="checkbox"/> Trust/Conservatorship <input type="checkbox"/> Other Probate <b>Estate Value</b> <input type="checkbox"/> Over \$200,000 <input type="checkbox"/> Between \$100,000 and \$200,000 <input type="checkbox"/> Under \$100,000 or Unknown <input type="checkbox"/> Under \$2,5000	<b>Construction Defect</b> <input type="checkbox"/> Chapter 40 <input type="checkbox"/> General <b>Contract Case</b> <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> Building & Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Collection of Accounts <input type="checkbox"/> Employment Contract <input type="checkbox"/> Other Contract	<b>Judicial Review</b> <input type="checkbox"/> Foreclosure Mediation Case <input type="checkbox"/> Petition to Seal Records <input type="checkbox"/> Mental Competency <b>Nevada State Agency Appeal</b> <input type="checkbox"/> Department of Motor Vehicles <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other Nevada State Agency <b>Appeal Other</b> <input type="checkbox"/> Appeal from Lower Court <input type="checkbox"/> Other Judicial Review/Appeal
Civil Writ		Other Civil Filing
<b>Civil Writ</b> <input type="checkbox"/> Writ of Habeas Corpus <input type="checkbox"/> Writ of Mandamus <input type="checkbox"/> Writ of Quo Warrant <input type="checkbox"/> Writ of Prohibition <input type="checkbox"/> Other Civil Writ		<b>Other Civil Filing</b> <input type="checkbox"/> Compromise of Minor's Claim <input checked="" type="checkbox"/> Foreign Judgment – Civil <input type="checkbox"/> Other Civil Matters

Business Court filings should be filed using the Business Court civil coversheet.

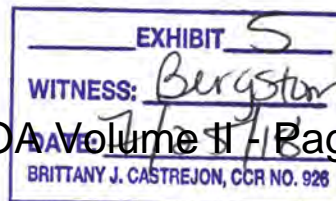
March 30, 2016

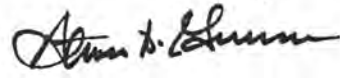
Date

/s/ Jeremy T. Bergstrom, Esq.

Signature of initiating party or representative

See other side for family-related case filings.





CLERK OF THE COURT

1 **FORJ**

2 Jeremy T. Bergstrom, Esq.  
3 Nevada Bar No. 6904  
4 BERGSTROM LAW, LTD  
5 9555 S. Eastern Avenue Suite 200  
6 Las Vegas, Nevada 89123  
(702) 333-0007 | FAX: (702) 333-1524  
Our File No. 21249  
Attorney for Judgment Creditor, NEILSON LEE

7 NEILSON LEE,

8 Plaintiff,

9 vs.

10 WAH ONN NG, aka KRIS WAH ONN NG  
11 and NG WAH ONN, and DOES I through X,  
Inclusive,

12 Defendants.  
13

Case No.:

Dept. No.:

A- 16- 734246- F

XXX

14 **APPLICATION OF FOREIGN JUDGMENT**

15 COMES NOW, Plaintiff, NEILSON LEE, by and through counsel, Jeremy T. Bergstrom,  
16 Esq. of the law firm of Bergstrom Law, Ltd., and hereby files his Foreign Judgment pursuant to  
17 NRS 17.350, et seq., and registers an exemplified copy of the Judgment attached hereto as  
18 "Exhibit 1".  
19

20 The Judgment was issued by the Circuit Court of the State of Oregon for Lane County,  
21 signed by the Honorable Jay A. McAlpin and filed on February 26, 2016.  
22

23 ///

24 ///

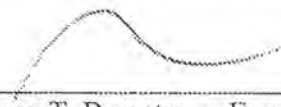
25 ///



1 I declare under penalty of perjury under the law of the State of Nevada that the foregoing  
2 is true and correct.

3 DATED this 30th day of March 2016.  
4  
5

6 BERGSTROM LAW, LTD

7  
8   
9 \_\_\_\_\_  
10 Jeremy T. Bergstrom, Esq.  
11 Nevada Bar No. 6904  
12 9555 S. Eastern Avenue Suite 200  
13 Las Vegas, Nevada 89123  
14 Attorney for Plaintiff, NEILSON LEE  
15  
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# EXHIBIT 1

IN THE CIRCUIT COURT OF THE STATE OF OREGON FOR LANE COUNTY

NEILSON LEE

Plaintiff / Petitioner

vs.

Case No. 15CV33982

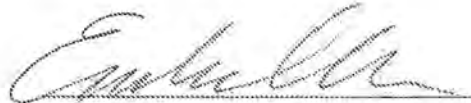
WAH ONN NG aka KRIS WAHO ONN NG  
and NG WAH ONN

Defendant/ Respondent

EXEMPLIFICATION CERTIFICATE

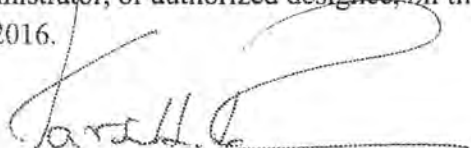
I, Elizabeth Rambo, court administrator for the Lane County Circuit Court of the State of Oregon, certify that the document attached is a true and correct copy of the GENERAL JUDGMENT BY DEFAULT AGAINST DEFENDANT, a record in the possession of the court. In testimony of this statement, I sign my name and affix the seal of the court on this 10 day of MARCH, 2016.



  
Court Administrator (or designee)

---


I, Karsten H. Rasmussen, presiding judge of the Lane County Circuit Court of the State of Oregon, certify that the person who certified the attached document is the court administrator, or authorized designee, on the date the certificate was signed. Dated this 11 day of MARCH, 2016.

  
Lane County Circuit Court Judge

---

I, Elizabeth Rambo, court administrator of the Lane County Circuit court of the State of Oregon, certify that the Honorable Karsten H. Rasmussen is a judge of the court, duly sworn, and that I am well acquainted with this official signature and certify the signature written above to be that of the judge. In testimony of this statement, I sign my name and affix the seal of this court on this 11 day of MARCH, 2016.



  
Court Administrator (or designee)



**IN THE CIRCUIT COURT OF THE STATE OF OREGON FOR LANE COUNTY**

NEILSON LEE,

Plaintiff,

vs.

WAH ONN NG, aka KRIS WAH ONN NG  
and NG WAH ONN,

Defendant.

Case No. 15CV33982

**GENERAL JUDGMENT BY DEFAULT  
AGAINST DEFENDANT**

This matter came before the court on plaintiff's motion for entry of general judgment against defendant, and the court, having previously entered an order of default against defendant on the 5<sup>th</sup> day of February, 2016, and being otherwise fully advised;

NOW, THEREFORE, JUDGMENT IS HEREBY ENTERED in favor of plaintiff and against defendant as follows:

**MONEY AWARD**

Judgment Creditor: Neilson Lee

Judgment Creditor's Attorneys: David A. Jacobs,  
Luvaas Cobb  
777 High Street, Suite 300  
Eugene, OR 97440-2747

Judgment Debtor: Wah Onn Ng, aka Kris Wah Onn Ng and Ng Wah Onn  
10587 Fabrica Street  
Las Vegas, NV 89141

Amount of Judgment: \$515,000.00

Prejudgment Interest: \$28,699.74

**LUVAAS / COBB**  
ATTORNEYS AT LAW

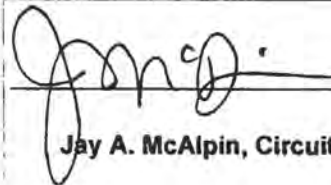
777 High Street, Suite 300  
Post Office Box 110747  
Eugene, OR 97440-2747  
Phone: 541-464-9292  
Fax: 541-243-1206



1 Postjudgment Interest: 9% from date of judgment until paid.

2 Costs and Disbursements: \$891.00

6 Signed: 2/26/2016 03:44 PM

7   
8 Jay A. McAlpin, Circuit Court Judge

9 Submitted by:

10 David A. Jacobs, OSB No. 942202

11 Luvaas Cobb

12 777 High Street, Suite 300

13 Eugene, OR 97401

14 E-mail: djacobs@luvaascobb.com

15 541-484-9292 - phone

16 541-343-1206 - fax

17 Benjamin Beijing Wang, OSB No. 983664

18 Co-Counsel

19 BENJAMIN BEIJING WANG PC

20 P.O. Box 50925

21 Eugene, OR 97405

22 E-mail: bwang@bwanglaw.com

23 541-484-1811 (phone)

24 541-431-3470 (fax)

25 Of Attorneys for Plaintiff

26

# EXHIBIT 2

**AFFT**

Jeremy T. Bergstrom, Esq.  
Nevada Bar No. 6904  
BERGSTROM LAW, LTD  
9555 S. Eastern Avenue Suite 200  
Las Vegas, Nevada 89123  
(702) 333-0007 | FAX: (702) 333-1524  
Our File No. 21249  
Attorney for Plaintiff, NEILSON LEE

NEILSON LEE,

Plaintiff,

vs.

WAH ONN NG, aka KRIS WAH ONN NG  
and NG WAH ONN, and DOES I through X,  
Inclusive,

Defendants.

Case No.:  
Dept. No.:

**AFFIDAVIT OF JUDGMENT CREDITOR**

Pursuant to N.R.S. 17.360, the following Affidavit is filed for the purpose of filing a  
sister-state judgment in the state of Nevada in the above-entitled matter.

STATE OF NEVADA            )  
  ) ss  
COUNTY OF CLARK         )

1. The name and last known address of the Judgment Debtor is:

WAH ONN NG aka KRIS WAH ONN NG and NG WAH ONN  
10587 FABRICA STREET  
LAS VEGAS, NV 89141

2. The name and last known address of the Judgment Creditor is:

NEILSON LEE  
C/O LUVAAS COBB  
777 High Street, Suite 300  
Eugene, OR 97440

3. The foreign judgment that is attached to the Application of Foreign Judgment is  
valid and enforceable.



4. As of March 28, 2016, to the best of the undersigned's knowledge, zero payments have been made and applied to this judgment.

I declare under penalty under the law of the State of Nevada that the foregoing is true and correct.

DATED this 30th day of March 2016.

By: BERGSTROM LAW, LTD

Jeremy T. Bergstrom, Esq.  
Nevada Bar No. 6904  
9555 S. Eastern Avenue Suite 200  
Las Vegas, Nevada 89123  
Attorney for Judgment Creditor,  
NEILSON LEE

STATE OF NEVADA )  
 ) ss  
COUNTY OF CLARK )

SUBSCRIBED and SWORN to before me  
this 30<sup>th</sup> day of March, 2016, appeared  
Jeremy Bergstrom

NOTARY PUBLIC

My Commission Expires: July 19, 2018





GENERAL INFORMATION	
PARCEL NO.	161-03-321-007
OWNER AND MAILING ADDRESS	IZQUIERDO SDDITA STROBEL SHELDON 2059 RASPBERRY HILL RD LAS VEGAS NV 89142
LOCATION ADDRESS CITY/UNINCORPORATED TOWN	2059 RASPBERRY HILL RD SUNRISE MANOR
ASSESSOR DESCRIPTION	ORCHARDS #43-LEWIS HOMES PLAT BOOK 59 PAGE 43 LOT 382 BLOCK C
RECORDED DOCUMENT NO.	* 20170816:02123
RECORDED DATE	Aug 16 2017
VESTING	JT

EXHIBIT 6  
WITNESS: *Berry Ann*  
DATE: *7/25/18*  
BRITTANY J. CASTREJON, CCR NO. 926

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

ASSESSMENT INFORMATION AND VALUE EXCLUDED FROM PARTIAL ABATEMENT	
TAX DISTRICT	340
APPRAISAL YEAR	2017
FISCAL YEAR	2018-19
SUPPLEMENTAL IMPROVEMENT VALUE	0
INCREMENTAL LAND	0
INCREMENTAL IMPROVEMENTS	0

REAL PROPERTY ASSESSED VALUE		
FISCAL YEAR	2017-18	2018-19
LAND	13300	13965
IMPROVEMENTS	45056	44324
PERSONAL PROPERTY	0	0
EXEMPT	0	0
GROSS ASSESSED (SUBTOTAL)	58356	58289
TAXABLE LAND+IMP (SUBTOTAL)	166731	166540
COMMON ELEMENT ALLOCATION ASSD	0	0
TOTAL ASSESSED VALUE	58356	58289
TOTAL TAXABLE VALUE	166731	166540

ESTIMATED LOT SIZE AND APPRAISAL INFORMATION	
ESTIMATED SIZE	0.09 Acres
ORIGINAL CONST. YEAR	1994
LAST SALE PRICE MONTH/YEAR SALE TYPE	228900 8/2017 R - Recorded Value
LAND USE	20.110 - Single Family Residential
DWELLING UNITS	1

PRIMARY RESIDENTIAL STRUCTURE					
1ST FLOOR SQ. FT.	906	CASITA SQ. FT.	0	ADDN/CONV	
2ND FLOOR SQ. FT.	834	CARPORT SQ. FT.	0	POOL	NO
3RD FLOOR SQ. FT.	0	STYLE	Two Story	SPA	NO
UNFINISHED BASEMENT SQ. FT.	0	BEDROOMS	4	TYPE OF CONSTRUCTION	Frame-Stucco
FINISHED BASEMENT SQ. FT.	0	BATHROOMS	3 FULL	ROOF TYPE	Concrete Tile
BASEMENT GARAGE SQ. FT.	0	FIREPLACE	1		
TOTAL GARAGE SQ. FT.	554				

Inst #: 20161230-0003306

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

RPTT: \$382.50 Ex: #

12/30/2016 02:23:55 PM

Receipt #: 2971433

Requestor:

NATIONAL TITLE COMPANY

Recorded By: CARLOSG Pgs: 4

DEBBIE CONWAY

CLARK COUNTY RECORDER

APN: 161-03-321-007  
Escrow No: 20169039-003-LM1  
R.P.T.T: \$ 382.50

Recording Requested By: National Title Co.  
Mail Tax Statements To: *Same as below*  
When Recorded Mail To:

IB Designs LLC  
6731 Fort Grey Ct.  
Las Vegas, NV 89139

**GRANT, BARGAIN, SALE DEED**

THIS INDENTURE WITNESSETH: That for valuable consideration, the receipt of which is hereby acknowledged Wahonn Ng, a married man as his sole and separate property who erroneously acquired title as Wah Ng Ong, a married man as his sole and separate property does hereby Grant, Bargain, Sell and Convey to IB Designs LLC, a Nevada limited liability company

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

**For Legal Description, See Attached Exhibit "A", attached hereto and made a part hereof.**

**SUBJECT TO:**

1. Taxes for fiscal year;
2. Reservations, restrictions, conditions, rights, rights of way and easements, if any of record on said premises.

Together with all and singular the tenements, hereditaments and appurtenances thereunto belonging or in anywise appertaining, and any reversions, remainders, rents, issues or profits thereof.

**See page 2 for signature of Grantor(s) and Notary Acknowledgment**

DEED0033 (DSI Rev. 05/14/14)



Escrow No. 20169039-003-LM1  
Grant, Bargain, Sale Deed... Continued



Wahonn NG

State of Nevada

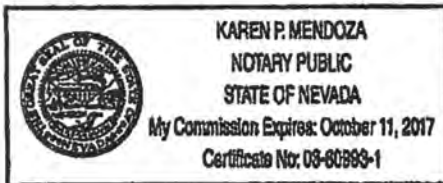
County of Clark

This instrument was acknowledged before me on 12-30-2014

by: Wahonn NG

Signature:

Notary Public



DEED0033 (DSI Rev. 05/14/14)

Escrow No. 20169039-003-LM1

**EXHIBIT "A"**  
**Legal Description**

Lot Three Hundred Eighty-two (382) in Block "C" of LEWIS HOMES - ORCHARDS NO. 43, as shown by map thereof on file in Book 59 of Plats, Page 43, in the Office of the County Recorder of Clark County, Nevada.

ASSESSOR'S COPY

**STATE OF NEVADA  
DECLARATION OF VALUE FORM**

**1. Assessor Parcel Number(s)**

a) 161-03-321-007  
b) \_\_\_\_\_  
c) \_\_\_\_\_  
d) \_\_\_\_\_

**2. Type of Property:**

a) ☐ Vacant Land      b) ☒ Single Fam. Res.  
c) ☐ Condo/Twnhse      d) ☐ 2-4 Plex  
e) ☐ Apt. Bldg      f) ☐ Comm'/Ind'l  
g) ☐ Agricultural      h) ☐ Mobile Home  
i) ☐ Other \_\_\_\_\_

**FOR RECORDERS OPTIONAL USE  
ONLY**

Book \_\_\_\_\_ Page \_\_\_\_\_  
Date of Recording: \_\_\_\_\_  
Notes: \_\_\_\_\_

**3. Total Value/Sales Price of Property:**

Deed in Lieu of Foreclosure Only (value of property) \$75,000.00  
Transfer Tax Value \$  
Real Property Transfer Tax Due \$75,000.00  
\$ 382.50

**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

**(GRANTOR) INFORMATION  
(REQUIRED)**

Print Name: Wahonn NG

Address: \_\_\_\_\_

6236 CLAPTON WAY  
LAS VEGAS, NV, 89148

**(GRANTEE) INFORMATION  
(REQUIRED)**

Print Name: IB Designs LLC

Address: \_\_\_\_\_

6731 Fort Grey Ct.  
Las Vegas, NV 89139

**COMPANY/PERSON REQUESTING RECORDING (Required if not the Seller or Buyer)**

Print Name: National Title Co./Lynnette Marrujo

Escrow #: 20169039-LM1

Address: 8915 S. Pecos Road, Unit 20A, Henderson, NV 89074

City, State, ZIP Code

**AS A PUBLIC RECORD THIS FORM MAY BE RECORDED/MICROFILMED**

SFRM0071 (DSI Rev. 05/14/14)



GENERAL INFORMATION	
PARCEL NO.	161-04-618-028
OWNER AND MAILING ADDRESS	FAT CAT & LUCKY DOG TRUST FEINSTEIN EDWARD TRS P O BOX 5033 SHERMAN OAKS CA 91413
LOCATION ADDRESS CITY/UNINCORPORATED TOWN	1711 ELAINE DR SUNRISE MANOR
ASSESSOR DESCRIPTION	SUNRISE VALLEY #3 LEWIS HOMES PLAT BOOK 26 PAGE 51 LOT 162 BLOCK A
RECORDED DOCUMENT NO.	* 20171018:01098
RECORDED DATE	Oct 18 2017
VESTING	NS

EXHIBIT 7  
 WITNESS: Bergstrom  
 DATE: 7/25/18  
 BRITTANY J. CASTREJON, CCR NO. 926

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

ASSESSMENT INFORMATION AND VALUE EXCLUDED FROM PARTIAL ABATEMENT	
TAX DISTRICT	340
APPRAISAL YEAR	2017
FISCAL YEAR	2018-19
SUPPLEMENTAL IMPROVEMENT VALUE	0
INCREMENTAL LAND	0
INCREMENTAL IMPROVEMENTS	0

REAL PROPERTY ASSESSED VALUE		
FISCAL YEAR	2017-18	2018-19
LAND	12250	14700
IMPROVEMENTS	23075	22531
PERSONAL PROPERTY	0	0
EXEMPT	0	0
GROSS ASSESSED (SUBTOTAL)	35325	37231
TAXABLE LAND+IMP (SUBTOTAL)	100929	106374
COMMON ELEMENT ALLOCATION ASSD	0	0
TOTAL ASSESSED VALUE	35325	37231
TOTAL TAXABLE VALUE	100929	106374

ESTIMATED LOT SIZE AND APPRAISAL INFORMATION	
ESTIMATED SIZE	0.14 Acres
ORIGINAL CONST. YEAR	1981
LAST SALE PRICE MONTH/YEAR SALE TYPE	183000 3/2017 R - Recorded Value
LAND USE	20.110 - Single Family Residential
DWELLING UNITS	1

PRIMARY RESIDENTIAL STRUCTURE					
1ST FLOOR SQ. FT.	1200	CASITA SQ. FT.	0	ADDN/CONV	
2ND FLOOR SQ. FT.	0	CARPORT SQ. FT.	0	POOL	NO
3RD FLOOR SQ. FT.	0	STYLE	One Story	SPA	NO
UNFINISHED BASEMENT SQ. FT.	0	BEDROOMS	3	TYPE OF CONSTRUCTION	Frame-Stucco
FINISHED BASEMENT SQ. FT.	0	BATHROOMS	2 FULL	ROOF TYPE	Composition Shingle
BASEMENT GARAGE SQ. FT.	0	FIREPLACE	0		
TOTAL GARAGE SQ. FT.	344				

APN: 161-04-618-028  
Escrow No: 20169038-003-LM1  
R.P.T.T: \$ 382.50

Recording Requested By: National Title Co.  
Mail Tax Statements To: *Same as below*  
When Recorded Mail To:  
IB Designs LLC  
6731 Fort Grey Ct.  
Las Vegas, NV 89139

Inet #: 20161230-0003398  
Fee: \$19.00 N/C Fee: \$0.00  
RPTT: \$382.50 Ex: #  
12/30/2016 02:34:42 PM  
Receipt #: 2971478  
Requestor:  
NATIONAL TITLE COMPANY  
Recorded By: ECM Pgs: 4  
DEBBIE CONWAY  
CLARK COUNTY RECORDER

### GRANT, BARGAIN, SALE DEED

THIS INDENTURE WITNESSETH: That for valuable consideration, the receipt of which is hereby acknowledged, Wahonn Ng, a married man as his sole and separate property who erroneously acquired title as Ng Wah Onn, a married man as his sole and separate property does hereby Grant, Bargain, Sell and Convey to IB Designs LLC, a Nevada limited liability company

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

For Legal Description, See Attached Exhibit A attached hereto and made a part hereof.

#### SUBJECT TO:

1. Taxes for fiscal year;
2. Reservations, restrictions, conditions, rights, rights of way and easements, if any of record on said premises.

Together with all and singular the tenements, hereditaments and appurtenances thereunto belonging or in anywise appertaining, and any reversions, remainders, rents, issues or profits thereof.

See page 2 for signature of Grantor(s) and Notary Acknowledgment

DEED0033 (DSI Rev. 05/14/14)



Escrow No. 20169038-003-LM1  
Grant, Bargain, Sale Deed... Continued

  
Wahonn Ng

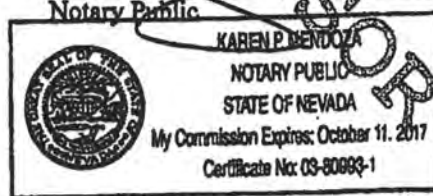
State of Nevada

County of Clark

This instrument was acknowledged before me on 12-20-2016

by: Wahonn Ng

Signature:



KAREN P. mendoza  
exp. 10/11/17  
cert 03-80993-1

DBED0033 (DSI Rev. 05/14/14)

Escrow No. 20169038-003-LM1

**EXHIBIT "A"**  
**Legal Description**

Lot One Hundred Sixty-two (162) in Block "A" of LEWIS HOMES – SUNRISE VALLEY  
NO. 3, as shown by map thereof on file in Book 26 of Plats, Page 51, in the Office of the  
County Recorder of Clark County, Nevada.

ASSESSOR'S COPY

**STATE OF NEVADA  
DECLARATION OF VALUE FORM**

**1. Assessor Parcel Number(s)**

a) 161-04-618-028  
b) \_\_\_\_\_  
c) \_\_\_\_\_  
d) \_\_\_\_\_

**2. Type of Property:**

a) ☐ Vacant Land      b) ☒ Single Fam. Res.  
c) ☐ Condo/Twnhse      d) ☐ 2-4 Plex  
e) ☐ Apt. Bldg      f) ☐ Comm'l/Ind'l  
g) ☐ Agricultural      h) ☐ Mobile Home  
i) ☐ Other \_\_\_\_\_

**FOR RECORDERS OPTIONAL USE  
ONLY**

Book \_\_\_\_\_ Page \_\_\_\_\_  
Date of Recording: \_\_\_\_\_  
Notes: \_\_\_\_\_

**3. Total Value/Sales Price of Property:**

Deed in Lieu of Foreclosure Only (value of property) \_\_\_\_\_  
Transfer Tax Value \_\_\_\_\_  
Real Property Transfer Tax Due \_\_\_\_\_

\$75,000.00  
\$ \_\_\_\_\_  
\$75,000.00  
\$ 382.50

**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

**(GRANTOR) INFORMATION  
(REQUIRED)**

Print Name: Wahonn Ng

Address: \_\_\_\_\_

6236 CLAPTON WAY  
LAS VEGAS, NV, 89148

**(GRANTEE) INFORMATION  
(REQUIRED)**

Print Name: IB Designs LLC

Address: \_\_\_\_\_

6731 FORT GREY CT  
LAS VEGAS, NV 89139

**COMPANY/PERSON REQUESTING RECORDING (Required if not the Seller or Buyer)**

Print Name: National Title Co./Lynnette Marrujo

Escrow #: 20169038-LM1

Address: 8915 S. Pecos Road, Unit 20A, Henderson, NV 89074

City, State, ZIP Code

AS A PUBLIC RECORD THIS FORM MAY BE RECORDED/MICROFILMED

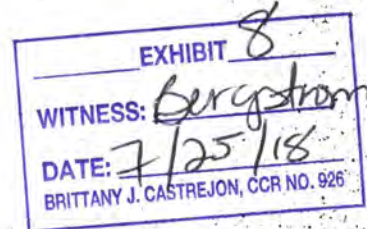
SFRM0071 (DSI Rev. 05/14/14)



Bank Acct.: GENERAL      Book Acct.: 1000  
Check #....: 450253  
Check date: 05/21/2018  
Amount....:      4,707.01  
Paid to....: LUVAAS COBB  
              DAVID JACOBS  
              777 HIGH ST SUITE 300  
              EUGENE, OR 97401  
Memo.....: 21249 RETURN OF PAYMENT  
Your ref #:  
  
Re Ourfile:

Check #....: 450253      Check date: 05/21/2018  
Paid to....: LUVAAS COBB  
Memo.....: 21249 RETURN OF PAYMENT  
Your ref #:

Amount....:      4,707.01



<small>TO VERIFY AUTHENTICITY, SEE REVERSE SIDE FOR DESCRIPTION OF THE 11 SECURITY FEATURES</small>	
<b>Bergstrom Law, Ltd.</b> Operating Account 9555 S. Eastern Avenue, Suite 200 Las Vegas, Nevada 89123	<b>Wells Fargo Bank</b> 2658 West Horizon Ridge Henderson, NV 89052 94-727 1224 NV
<b>450253</b>	
Date: 05/21/2018	
Pay to the Order Of:	<b>LUVAAS COBB</b> <span style="float: right;"><b>\$4,707.01</b></span>
FOUR THOUSAND SEVEN HUNDRED SEVEN AND 01/100 DOLLARS <span style="float: right;">Dollars</span>	
LUVAAS COBB DAVID JACOBS 777 HIGH ST SUITE 300 EUGENE, OR 97401	
Memo:	21249 RETURN OF PAYMENT
⑈ 4 50 2 5 3 ⑈ ⑆ 3 2 1 2 7 0 7 4 2 ⑆ 8 5 6 8 3 3 9 4 3 9 ⑈	

CASE No. A-16-734246-F

.....

Cross-Reference Case Number: A734246

## PARTY INFORMATION

### Lead Attorneys

Plaintiff            Lee, Neilson

**Jeremy T. Bergstrom**  
Retained  
702-369-5960(W)

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**EVENTS & ORDERS OF THE COURT**

## DISPOSITIONS

03/30/2016	<b>Foreign Judgment</b> (Judicial Officer: Wiese, Jerry A.) Debtors: Wah Onn Ng (Defendant), Ng Wah Onn (Defendant) Creditors: Neilson Lee (Plaintiff) Judgment: 03/30/2016, Docketed: 04/06/2016 Total Judgment: 544,590.74
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## OTHER EVENTS AND HEARINGS

03/30/2016	<b>Application of Foreign Judgment - NRS 17</b> <i>Application of Foreign Judgment</i>
04/01/2016	<b>Notice of Filing Application of Foreign Judgment &amp; Affidavit</b> <i>Notice of Filing Foreign Judgment and Affidavit of Judgment Creditor</i>

## FINANCIAL INFORMATION

	<b>Plaintiff Lee, Neilson</b>			
	Total Financial Assessment			290.00
	Total Payments and Credits			290.00
	<b>Balance Due as of 07/25/2018</b>			<b>0.00</b>
03/30/2016	Transaction Assessment			270.00
03/30/2016	Efile Payment	Receipt # 2016-31631-CCCLK	Lee, Neilson	(270.00)
01/19/2017	Transaction Assessment			10.00
01/19/2017	Payment (Window)	Receipt # 2017-05971-CCCLK	Bergstrom Law, Ltd	(10.00)
01/31/2017	Transaction Assessment			10.00
01/31/2017	Payment (Window)	Receipt # 2017-09722-CCCLK	Bergstrom Law, Ltd	(10.00)



# STATE BAR OF NEVADA

December 22, 2015

Jeremy Bergstrom, Esq.  
2850 W. Horizon Ridge Parkway  
Henderson, Nevada 89052

## LETTER OF CAUTION

RE: Grievance File #OBC15-0410/ Wells Fargo Bank

Dear Mr. Bergstrom:

A Screening Panel of the Southern Nevada Disciplinary Board has reviewed the above-referenced grievance file. The Panel unanimously concluded that formal disciplinary proceedings would not be initiated against you. Therefore, the grievance was dismissed and, as such, this matter is closed.

However, the Panel instructed the Office of Bar Counsel to caution you regarding your ethical obligations regarding attorney-client trust accounts. The Panel suggested that you confirm funds are available in the IOLTA before drawing against them. As you know, protection of funds entrusted to attorneys is a primary duty imposed upon the legal community.

If you have any questions, do not hesitate to contact our office.

Sincerely,



R. Kait Flocchini  
Assistant Bar Counsel

KFlo



600 East Charleston Blvd.  
Las Vegas, NV 89104-1563  
phone 702.382.2200  
toll free 800.254.2797  
fax 702.385.2878

9456 Double R Blvd., Ste. B  
Reno, NV 89521-5977  
phone 775.329.4100  
fax 775.329.0522

[www.nvbar.org](http://www.nvbar.org)





# STATE BAR OF NEVADA



April 10, 2015

**Sent via Regular and Certified Mail: #7012 1010 0000 9353 6965**

Jeremy T. Bergstrom, Esq.  
2850 W. Horizon Ridge Pkwy., Suite 200  
Henderson, NV 89052

600 East Charleston Blvd.  
Las Vegas, NV 89104-1563  
phone 702.382.2200  
office 800.254.2797  
fax 702.385.2878

9456 Double R Blvd., Ste. B  
Reno, NV 89521-5977  
phone 775.329.4100  
fax 775.329.0522

Re: Grievance File No. OBC15-0411 / Wells Fargo Bank

Dear Mr. Bergstrom:

[www.nevbar.org](http://www.nevbar.org)

The Office of Bar Counsel has been notified by Wells Fargo Bank that your trust account is overdrawn. A copy of the notice is enclosed. As such, a grievance file has been opened.

At your earliest convenience, please correspond with the Office of Bar Counsel and explain the reason for the overdraft and what you have done to correct it. Your response should provide this office with documentation sufficient to substantiate your explanation, including but not limited to:

1. Copies of pertinent bank statements;
2. Bank notices;
3. Deposit slips; and
4. Checks.

If your explanation involves the distribution of litigation proceeds and/or attorney fees, please include documentation sufficient to justify the amounts being paid, along with the contact information for the applicable clients and third parties.

**Your response will be calendared for April 24, 2015.** Due to the serious nature of this matter, no extensions will be granted. If you have any questions, please do not hesitate to contact our office.

Sincerely,  


Phillip J. Pattee  
Assistant Bar Counsel

PJP/rc

Enclosure

EXHIBIT	11
WITNESS:	Bergstrom
DATE:	7/25/16
BRITTANY J. CASTREJON, CCR NO. 926	



JEREMY T. BERGSTROM, ESQ.  
Admitted in Arizona and  
Nevada

KATE HEIDBRINK, ESQ.  
Admitted in California,  
Massachusetts, and New  
York

J. TAYLOR OBLAD, ESQ.  
Admitted in California and  
Nevada

**B BERGSTROM LAW, LTD.**  
ATTORNEYS AT LAW

2850 W. Horizon Ridge Parkway, Suite 200  
Henderson, NV 89052  
Phone: (702) 430-4531 | Fax: (702) 430-4501

ROBERT K. NAUMANN, ESQ.  
Of Counsel -  
Admitted in Illinois

April 24, 2015

Office of Bar Counsel  
State Bar of Nevada  
3100 West Charleston Blvd., Ste. 100  
Las Vegas, NV 89102

SENT VIA FACSIMILE 702-385-2878 and

VIA HAND DELIVERY

EXHIBIT 12

WITNESS: *Bergstrom*

DATE: *7/25/18*

BRITTANY J. CASTREJON, CCR NO. 926

RECEIVED BY

APR 27 2015

STATE BAR OF NEVADA

Re: *Grievance File No. OBC15-0411/Wells Fargo Bank*

Mr. Pattee:

This letter is written in response to the correspondence I received from the State Bar of Nevada dated April 10, 2015, wherein I was informed of Grievance File No. OBC15-0411 and asked to respond by today's date. The Grievance File at issue resulted from an overdraft on an IOLTA trust account maintained at Wells Fargo Bank. Please allow this letter to serve as Bergstrom Law, Ltd's response to the issues asserted therein.

Bergstrom Law, Ltd. (hereinafter "the Firm") is a newly established law firm that began doing business in November 2014. The firm is multi-jurisdictional and practices in multiple states. The Firm's practice areas result in large numbers of banking transactions and trust account activity. Specifically, the Firm represents clients in matters of debt collection, real property foreclosure, litigation, and creditor bankruptcy matters, among other things.

The firm has three IOLTA Trust Accounts maintained at Wells Fargo Bank in Henderson, Nevada. The first IOLTA account is the account at issue here, the Troy IOLTA Trust Account. This account is used exclusively for transactions on Firm files wherein Troy Capital, LLC is the client. The second IOLTA account is identified as the General IOLTA Trust Account. This account is used for transactions on Firm files wherein Troy Capital, LLC is not the client. Both the Troy IOLTA and the General IOLTA accounts were created during the initial office set-up for the Firm.

Nearly two months later, on January 26, 2015, the third Trust Account was created and identified as the Merchant IOLTA Trust Account. This account is used as a temporary holding account exclusively for payments received via merchant services on the Firm's debt collection files. Merchant services payments consist of payments made online or via telephone. The Firm retained the services of Wells Fargo Bank to provide the training and means necessary to accept and process merchant services payments. The training process was extensive and the bank conducts its own review process before allowing businesses these types of services. While the ability to utilize merchant services is very important to most businesses, there is one weakness or deficiency that exists in the merchant services technology that resulted in the need to create this Merchant IOLTA Account. Specifically, that deficiency is the inability of the receiver of the payments to select and identify a specific account at the time the payments are made in which to deposit the payments. Instead, one account must be linked to merchant services payments and all payments received must be deposited into that account. This was problematic to the Firm because

merchant services payments were received on files wherein Troy Capital, LLC was the client and on files wherein they were not the client. Depositing Troy Capital, LLC funds to the General IOLTA account instead of its own Trust Account was not desirous, nor was the opposite scenario where Client A or Client B funds were deposited into the Troy IOLTA Account instead of the General IOLTA Account. For these reasons, the Merchant IOLTA Account was created and identified as the account in which all merchant services payments would initially be deposited. Shortly after initial deposits into this account were made, they would be transferred from the Merchant IOLTA Account to the IOLTA Account of the respective clients the funds belonged to.

As will be discussed in more detail below, the Merchant IOLTA Account played a large role in the overdraft of the Troy IOLTA Account. Please bear in mind the assimilation of the Merchant IOLTA Account into the Firm's workflow and procedures had only recently started when the issue herein occurred. The first transaction involving the Merchant IOLTA Account was on February 2, 2015, only a month before the overdraft occurred. For that matter, all Firm workflows and procedures were still relatively new, being fully understood by all Firm staff and being revised when deficiencies were identified. The first substantive transaction on the Troy IOLTA Account was made on January 12, 2015, a month and a half before the overdraft.

To properly establish the background, it is worth noting the Firm's hiring of an Accounting Manager in December 2014 on a part time basis while she was winding down work with a different firm. The assimilation of this staff member and her ideas and recommendations into the Firm's Workflows and Procedures was challenging. This staff member will be discussed in more detail below along with the relevant workflows and procedures.

Attached hereto as Exhibit "A" is a complete copy of all transactions in or out of the Troy IOLTA Account since its creation a short time ago. You will note transactions occurring on this account prior to the first transaction date of January 12, 2015 noted immediately above. In order to open any account at Wells Fargo Bank, a \$50 deposit fee was required. When asked how I wanted to pay the deposit, I explained the \$50 could be taken out of existing non-IOLTA accounts. Wells then elected to transfer \$44 from a firm operating account and another \$6 from a different account I have there to total the \$50 deposit and that deposit was applied to this account on December 1, 2014. With the intent of keeping the entirety of the balance of this account comprised only of client funds, the \$50 deposit was withdrawn from this account on December 15, 2014. There are also two transactions dated December 31, 2014 regarding an interest payment of one cent. These administrative entries aside, the first substantive transaction on this account was made on January 12, 2015.

Attached hereto as Exhibit "B" is a complete copy of all transactions in or out of the Merchant IOLTA Account since its creation a very short time ago. Again, you will note a transaction made on this account representing the payment of the required \$50 deposit on January 26, 2015. The first substantive transaction, however, was not made until February 2, 2015.

The General IOLTA Account in no way affected or played any part in the overdraft of the Troy IOLTA Account and it is really irrelevant to the issues discussed herein. For that reason, I am not providing any comment or analysis on that account in this response. In the event my assumption that this account need not be addressed is incorrect, I will be happy to provide whatever information you'd like concerning it upon request.



The background having been provided above, the focus shifts to the specific event that gave rise to the Grievance File. As established above, the Firm had only been in business for three months before the overdraft and much of that time was spent not practicing law or working on legal workflows or procedures but instead obtaining the required licenses and state employer numbers in several states along with the required vendors and software, etc.

At the time of the overdraft, the Firm was receiving incoming payments from various sources and different mechanisms. Among these sources and mechanisms were paper checks and money orders mailed or delivered to the Firm, online or telephone merchant services payments, scheduled recurring merchant services payments, checks from third party vendors at foreclosure sale auctions, and wage garnishment payments from employers.

Payments to the firm resulting from firm invoices for services provided and the Firm's clients had no interest in were immediately deposited into the Firm's Operating Account upon receipt. Non-Merchant payments to the firm that clients had an interest in were immediately deposited via desktop deposit scanner to the appropriate IOLTA Account upon receipt. Large dollar checks from foreclosure sale auctions were taken by me personally to the local Wells Fargo Bank branch for deposit into the General IOLTA Account. Troy Capital, LLC did not place foreclosure files and they would never be involved with foreclosure sales so the Troy IOLTA account would never be used for this purpose. Finally, all merchant services payments were immediately deposited into the Merchant IOLTA Account immediately upon receipt.

It is here where the procedures and workflow broke down in the case of the overdraft at issue. In order to bring the balance of the Troy IOLTA Account to the number that represents all Troy Capital, LLC funds in the possession of the Firm, the Merchant IOLTA Account funds belonging to Troy Capital, LLC must be transferred from the Merchant IOLTA Account to the Troy IOLTA Account. That did not happen in this particular instance, though I thought it did at the time. Below is the sequence of events that lead to this overdraft:

In mid-February 2015, the Firm was preparing for a monthly remit of all sums collected on its debt collection files. The first step of this process was to clear out the funds in the Merchant IOLTA Account by transferring them to the applicable Troy or General IOLTA Account.

On Wednesday, February 18, 2015, the Accounting Manager, Tina Carrillo, sent me an e-mail regarding the merchant services transfers that should occur along with a spreadsheet detailing the transfers. I was slightly behind on my e-mails at this time, so I didn't address the e-mail until Monday, February 23, 2015, at which time I made online transfers from Merchant IOLTA Trust to Troy IOLTA Trust and General IOLTA Trust as requested in the spreadsheet. I then confirmed that the transfers were made that same day, on Monday, February 23, 2015. Copies of these documents are collectively attached as Exhibit "C."

On Tuesday, February 24, 2015, the day after I made the transfers from Merchant Trust, I received an e-mail from Tina Carrillo regarding the remit and an accompanying report detailing the proposed remits. Copies of these documents are collectively attached as Exhibit "D." The remit report details the incoming payments and the intended disposition of them and, among many other things, it confirms that the incoming payments cleared the bank and could be disbursed with no risk of NSF. It does not, however, contain the balance in the trust accounts from which the remits will be paid. I reviewed this report and,

under the belief the Merchant IOLTA Account had been properly addressed by my transfers from it just the day before, I approved it.

On Wednesday, February 25, 2015, the day after the remit was approved, I received an e-mail from Tina Carrillo, requesting additional merchant services transfers and an accompanying spreadsheet. I did not get a chance to address this e-mail for a few days. Tina Carrillo e-mailed me again on March 4, 2015 explaining that because these Merchant IOLTA transfers were not made, the Troy IOLTA was overdrawn. Copies of these e-mails are collectively attached as Exhibit "E."

Wells Fargo Bank then e-mailed me on March 4, 2015 informing me of the overdraft and requesting that funds be transferred to cover the overdraft. I then immediately investigated to find out what happened, I determined what happened and I fixed the problem by transferring the funds requested in the February 24, 2015 e-mail from Merchant IOLTA to Troy IOLTA. I then e-mailed Wells Fargo Bank explaining the situation was taken care of and Wells Fargo honored the check overdrawn on the Troy IOLTA account. The check at issue was made payable to Troy Capital, LLC. Copies of these e-mails are attached as Exhibit "F."

In sum, the overdraft was caused as follows:

The approved remit dated February 24, 2015 that contained the overdrawn check payment from Troy IOLTA Trust to Troy Capital, LLC was unknowingly dependent upon a subsequent act being performed. The subsequent act required was the transfer of funds from Merchant IOLTA Trust to Troy IOLTA Trust that was requested February 24, 2015, the day after the remit was approved.

It has never been acceptable for anyone associated with me or this firm to have to perform subsequent acts to ensure checks drawn on any account will clear. This was completely contrary to my knowledge and understanding. My understanding was the Merchant IOLTA transfers I made February 23, 2015, just one day before the remit was approved, resulted in transfers sufficient to successfully complete the remit with no further action being required.

My investigation into this situation revealed that the remit approved on February 24, 2015 contained incoming payments that cleared the issuing banks and posted through that February 24, 2015 date. It also revealed that the Merchant IOLTA transfers requested the following day on February 25, 2015 contained incoming payments from that same period of time that were necessary to transfer into the Troy IOLTA account to make the balance reflective of the actual Troy Capital, LLC funds in the firm's possession.

Tina Carrillo was the Accounting Manager at the law firm Miles, Bauer, Bergstrom & Winters, LLP for the past several years and I was a partner at that firm for the 13 years prior to starting the new Firm. While the two of us were employed together there, multi-millions of dollars were processed through roughly 10 trust accounts at one time by way of many hundreds of transactions and, to the best of my knowledge, there was only one instance where an account was overdrawn during that time. In spite of that prior history, the two of us did not properly connect in this instance or with the procedures in place.

This will not re-occur going forward. Since the incident, I personally spend far more time reviewing and confirming all relevant facts and being far more meticulous in general confirming balances and all other events that could affect any check drawn on any of the three IOLTA accounts. I've also added far more detail to the notes for documentation purposes when making online transfers to or from any IOLTA account. See Exhibit "B" for examples of this. Beginning with the March 4, 2015 transfers from



Merchant IOLTA Trust to both Troy IOLTA and General IOLTA Trust, the notes reflected on the online statements contain the posted dates the transfers pertain to as well as any specific amount or file number if space existed for the comments.

I personally cross-reference all reports and information given to me by Tina Carrillo or anyone else against the bank statements and all other available data to confirm its veracity, with particular emphasis focused on the good through dates of all data. I personally review every incoming check to determine the IOLTA account it belongs in and I write that account number on each check before giving to the staff to deposit. I then review each daily deposits receipt to confirm each check went into the correct IOLTA account. I personally transfer all funds from Merchant IOLTA to Troy IOLTA or General IOLTA Trust.


Before approving any remits that are drawn on the IOLTA accounts, I personally confirm that both the remit and the latest transfers from Merchant IOLTA Trust to Troy IOLTA and General IOLTA Trust both have identical posted good through dates to ensure the IOLTA accounts are processed through the exact same period in time as the remits. I then confirm balances in each IOLTA account are reconciled with the check deposits and prior transfer back-ups as well as being reconciled against the intended remit amount to be paid from the two IOLTA Trust Accounts.

This incident has been a reminder to always stay focused and attentive to these issues and it's been personally embarrassing to me and my new Firm. My level of attention to these issues has been exponentially heightened. This will not happen again. The account at issue was exclusively used for Troy Capital, LLC. In the event you'd like to speak with them, my contact there is Rance Willey and he may be reached at 702-233-3302.

If anything else is requested, please don't hesitate to contact me at 702-430-4537, by e-mail at [jbergstrom@jbergstromlaw.com](mailto:jbergstrom@jbergstromlaw.com) or by mail at 2850 W. Horizon Ridge Pkwy., Ste. 200, Henderson, NV 89052. I will provide any additional information upon request.

Sincerely,

BERGSTROM LAW, LTD.



Jeremy T. Bergstrom, Esq.  
Managing Attorney

<b>reminder</b> 123:11	12:16 20:11 49:22 61:5 67:10 76:10	129:24 130:6	58:7,10 75:24 76:1,12 77:6, 17 78:2	109:11,13 110:1,4 130:3,20
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<b>remitting</b> 124:6		<b>request</b> 18:24 30:19 76:5,18 77:11 78:9 101:3	<b>reserve</b> 110:24	<b>respondent</b> 1:8 2:8 14:20 18:12,16 44:9 50:20 59:18 64:20 105:13, 16,19 106:1 116:8,19,22 117:13,17,21, 23,25 118:3, 6,13 119:4 121:20 122:25 123:2, 12,14 131:7
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STATE BAR OF NEVADA  
SOUTHERN NEVADA DISCIPLINARY BOARD

**JEREMY T. BERGSTROM, ESQ.**  
Nevada Bar No. 6904

**FORMAL HEARING**  
Grievance File No.: OBC17-1050  
Wednesday, July 25, 2018, at 9 a.m.

EXHIBIT	1
WITNESS:	Bergstrom
DATE:	7/25/18
BRITTANY J. CASTREJON, CCR NO. 928	

DOCUMENT	INDEX OF DOCUMENTS	PAGE NOS.
Complaint, First Designation of Hearing Panel Members & Affidavit of Mailing Filed April 5, 2018.....		SBN 001-018
Notice of Intent to Default Filed May 2, 2018.....		SBN 019-024
Order Appointing Hearing Panel Chair Filed May 14, 2018.....		SBN 025-027
Notice of Telephonic Case Conference Filed May 15, 2018.....		SBN 028-032
Answer Filed May 22, 2018.....		SBN 033-039
Scheduling Order Filed June 1, 2018.....		SBN 040-043
State Bar of Nevada's Initial Summary of Evidence and Disclosure of Witnesses Filed June 7, 2018.....		SBN 044-047
Brief in Support of Telephonic Testimony Filed June 20, 2018.....		SBN 048-053
Notice of Formal Hearing Filed June 20, 2018.....		SBN 054-055
Order Appointing Formal Hearing Panel Filed June 20, 2018.....		SBN 056-057
State Bar of Nevada's Final Disclosure of Evidence and Witnesses for Formal Hearing Filed June 25, 2018.....		SBN 058-061

SBN Exhibit 1

**PANEL**

Dawn M. Lozano, Esq. Chair  
John E. Bragonje, Esq.  
Randall Scott, Lay Member

Ann C. Elworth, Esq.  
Assistant Bar Counsel

Tiffany Bradley  
Hearing Paralegal

Jeremy T. Bergstrom, Esq.  
Respondent



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APR 05 2018

STATE BAR OF NEVADA  
BY: S. J. J. J.  
OFFICE OF BAR COUNSEL

STATE BAR OF NEVADA  
SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,

Complainant,

vs.

JEREMY T. BERGSTROM, ESQ.,  
NV Bar No. 6904,  
Respondent.

COMPLAINT

TO: Jeremy T. Bergstrom, Esq.  
9555 S. Eastern Avenue, Ste. 200  
Las Vegas, NV 89123

PLEASE TAKE NOTICE that pursuant to Supreme Court Rule 105(2), as amended effective March 1, 2007, a **VERIFIED RESPONSE OR ANSWER** to this Complaint must be filed with the Office of Bar Counsel, State Bar of Nevada ("State Bar"), 3100 W. Charleston Boulevard, Suite 100, Las Vegas, Nevada 89102, **within twenty (20) days of service of this Complaint.** Procedure regarding service is addressed in Supreme Court Rule 109.

1. Complainant, State Bar of Nevada ("State Bar"), alleges that the Respondent, Jeremy T. Bergstrom ("Respondent"), Nevada Bar No. 6904, is now and at all times pertinent herein was an attorney in the State of Nevada and that he engaged in acts of misconduct in Clark County, Nevada, warranting the imposition of professional discipline as set out herein.

COUNT 1  
OBC17-1050/David Jacobs

2. David A. Jacobs, Esq. (Jacobs) in an out of state attorney who referred his client,



1 Neilson Lee (Lee) to Respondent to domesticate a judgment in Nevada from the State of Oregon,  
2 as well as to pursue collections against the debtor. Lee paid a \$5,000 retainer to Respondent, who  
3 filed the foreign judgment action, but did nothing else, while misrepresenting his actions to Jacobs  
4 and Lee.

5 3. Jacobs' grievance was received at the State Bar on August 7, 2017. According to  
6 the grievance Jacobs' client, Lee, had obtained a judgment in an Oregon court against Wah Onn  
7 Ng (Ng). They obtained information that the Ng was suspected to be living and owned real  
8 property in Las Vegas.

9 4. Jacobs' retainer agreement between Lee and Respondent, dated March 22, 2017  
10 indicates that Lee retained Respondent through an attorney named Benjamin Wang. This retainer  
11 was not signed by Respondent. The scope of representation described Respondent's services as:  
12 *"to register and domesticate an Oregon Judgment entered in favor of Client in the above*  
13 *captioned matter in the State of Nevada and attempt to collect upon Client's judgment that with*  
14 *principal and interest now totals \$543,699.74."* This agreement included a \$5,000 retainer fee  
15 and a 20% contingency on any collected fees.

16 5. Wang mailed this retainer to Respondent on March 28, 2017 and included a check  
17 from Lee for \$5,000.

18 6. On April 1, 2016, Respondent filed the foreign judgment in the Clark County  
19 Eighth District Court (CCDC), Case No A-16-734246-F.

20 7. Subsequent to this filing, Wang sent an email dated April 18, 2016 to Respondent  
21 in which he provides information on locating the debtor in Las Vegas. In response to this email,  
22 Respondent wrote back saying that the judgment was "domesticated in Nevada on 3/30/16. There  
23 is a 30 day stay following the domestication that temporarily enjoins judicial post-judgment  
24 collection measures. We are now in that stay period. The stay expires on 5/4/16 (taking into  
25 consideration mailing time and from that point forward, we can levy against any non-exempt asset

1 we can find." Respondent then goes into a discussion regarding the debtor and describing him as  
2 a "whale" and explained the gambling habits of "whales."

3 8. On May 11, 2016, after an inquiry from Jacobs, Respondent sent an email saying  
4 that he had been ill with the flu for two weeks and is playing catch up. He apologized for not  
5 responding while "out of commission."

6 9. On June 23, 2016, Respondent sent another lengthy email to Jacobs regarding his  
7 search efforts. Attached to this was an email the same date from Maggie Bardis (Bardis) with an  
8 address at Respondent Law. This email contains the information on the debtor that Respondent  
9 provided Jacobs.

10 10. Jacobs says that the next and last communication from Respondent was an email on  
11 January 17, 2017. This was an email that said, "The legal process to cause forced execution of  
12 sales of the real property located at 2059 Raspberry Hill Road in Laws Vegas and 1711 Elaine  
13 Drive in Las Vegas is underway. Our research and asset detection efforts have identified those  
14 two assets are the most viable (sic) recovery targets and the most likely to lead to satisfaction of  
15 the judgment."

16 11. Respondent goes on to say that "we will continue forward with these execution  
17 sales and keep you updated along the way." He then apologized for "not keeping you apprised of  
18 the status previously." This was the last correspondence from Respondent to Jacobs, Wang and/or  
19 Lee regarding this matter.

20 12. The State Bar sent a Letter of Investigation via email to Respondent from Intake on  
21 August 15, 2017. Respondent's response was due on August 29, 2017. He did not respond.

22 13. On September 13, 2017, a letter informing Respondent of his requirement to  
23 respond to State Bar investigations and reminding him that a failure to do so is a violation of RPC  
24 8.1 was sent. This letter was signed for by Bardis with no date and the return receipt was received  
25 at the State Bar on September 19, 2017. Respondent failed to respond to this letter.

1           14.     The case was assigned to Investigation on November 15, 2017 with a second letter  
2 sent on November 16, 2017. This letter to was signed for by Bardis with no date and the return  
3 receipt was received at the State Bar on November 21, 2017. Respondent failed to respond to this  
4 communication as well.

5           15.     During this investigation, it was discovered that Respondent had two default civil  
6 judgments entered against him in the Clark County District Court on September 26, 2017. The  
7 first, A-16-745158-C, *Bank of America vs Jeremy Bergstrom* shows a judgment against  
8 Respondent in the amount of \$33,070.51 plus costs. The second, A-16-748031-C, *Bank of*  
9 *America vs Jeremy Bergstrom*, in the amount of \$24,828.57 plus costs. Both these judgments  
10 were due to non-payment of credit cards.

11           16.     Further investigation revealed that the two properties described by Respondent as  
12 being debtor assets were located on the Clark County Tax Assessor website. The first, 2059  
13 Raspberry Hill Rd., Las Vegas was owned by the debtor, Ng and was sold in December 2016 and  
14 again in August 2017. The second, 1711 Elaine Dr., Las Vegas, was also owned by Ng and sold  
15 in December 2016.

16           17.     A check of the Clark County court's website showed numerous cases which  
17 Respondent is the attorney of record. A review of those cases revealed no adverse actions by  
18 Respondent, and he appears to be making all required appearances.

19           18.     In light of the foregoing, Respondent violated Rule of Professional Conduct (RPC)  
20 RPC 1.1 (Competence); 1.3 (Diligence); 1.4 (Communications); 1.15 (Safekeeping Property); 3.2  
21 (Expediting Litigation); 8.1(b) (Failure to Respond to Demand for Information from the State  
22 Bar); and 8.4 (Misconduct).

23           WHEREFORE, Complainant prays as follows:

24           1.     That a hearing be held pursuant to Nevada Supreme Court Rule 105;  
25

1                   2.     That Respondent be assessed the costs of the disciplinary proceeding  
2 pursuant to Supreme Court Rule 120(1); and

3                   3.     That pursuant to Supreme Court Rule 102, such disciplinary action be taken  
4 by the Southern Nevada Disciplinary Board against Respondent as may be deemed appropriate  
5 under the circumstances.

6                   Dated this 5<sup>th</sup> day of April 2018.

7                   **STATE BAR OF NEVADA**

8                   C. Stanley Hunterton, Bar Counsel

9                   By: 

10                  Jason R. Dworin, Assistant Bar Counsel

11                  Nevada Bar No. 9006

12                  3100 W. Charleston Boulevard Suite 100

13                  Las Vegas, Nevada 89102

14                  (702) 382-2200





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APR 05 2018

STATE BAR OF NEVADA

BY: Samuel R.  
OFFICE OF BAR COUNSEL

STATE BAR OF NEVADA  
SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,

Complainant,

vs.

JEREMY T. BERGSTROM, ESQ.,

NV Bar No. 6904,

Respondent.

DESIGNATION OF  
HEARING PANEL MEMBERS

**TO: Jeremy T. Bergstrom, Esq.**  
**9555 S. Eastern Avenue, Ste. 200**  
**Las Vegas, NV 89123**

The following are members of the Disciplinary Board for the Southern District of Nevada.  
Pursuant to Nevada Supreme Court Rule (SCR) 105, you may issue peremptory challenge to five (5) such individuals by delivering the same in writing to the Office of Bar Counsel within twenty (20) days of service of the complaint.

The Chair of the Southern Nevada Disciplinary Board will thereafter designate a hearing panel of three (3) members of the Disciplinary Board, including at least one member who is not an attorney, to hear the above-captioned matter.

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2. Dawn M. Lozano, Esq., Vice Chair
3. Ketan D. Bhirud, Esq.
4. Ronald C. Bloxham, Esq.
5. Katlyn Brady, Esq.
6. John E. Bragonje, Esq.

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- 2 8. Douglas M. Brooks, Esq.
- 3 9. Robert J. Caldwell, Esq.
- 4 10. Sigal Chattah, Esq.
- 5 11. Andrew A. Chiu, Esq.
- 6 12. James P. Chrisman, Esq.
- 7 13. Nell E. Christensen, Esq.
- 8 14. Mark J. Connot, Esq.
- 9 15. Marc P. Cook, Esq.
- 10 16. Bryan A. Cox, Esq.
- 11 17. Ira W. David, Esq.
- 12 18. Joshua M. Dickey, Esq.
- 13 19. F. Thomas Edwards, Esq.
- 14 20. Jack W. Fleeman, Esq.
- 15 21. Jason M. Gerber, Esq.
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- 17 23. Robert G. Giunta, Esq.
- 18 24. Yolanda Givens, Esq.
- 19 25. Parish D. Heshmati, Esq.
- 20 26. Kenneth E. Hogan, Esq.
- 21 27. Christopher J. Lalli, Esq.
- 22 28. Christopher J. Laurent, Esq.
- 23 29. James T. Leavitt, Esq.
- 24 30. Michael B. Lee, Esq.
- 25 31. Mark D. Lerner, Esq.

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- 32. Anat R. Levy, Esq.
- 33. Richard L. Litt, Esq.
- 34. Rhonda Long, Esq.
- 35. Mandy McKeller, Esq.
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- 37. Jason R. Maier, Esq.
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- 51. Jordan S. Savage, Esq.
- 52. Robert E. Schumacher, Esq.
- 53. Thomas R. Sheets, Esq.
- 54. Jeffrey G. Sloane, Esq.
- 55. Sarah E. Smith, Esq.
- 56. Frank A. Toddre, II, Esq.

- 1 57. Dawn Throne, Esq.
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- 4 60. Reed J. Werner, Esq.
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- 6 62. Mary E. Albregts, Laymember
- 7 63. Noel Anschutz, Laymember
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- 16 72. Kellie C. Rubin, Laymember
- 17 73. Randall Scott, Laymember
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- 76. Harvey Weatherford, Laymember
- 77. John White, Laymember

Dated this 5<sup>th</sup> day of April 2018.

STATE BAR OF NEVADA  
C. Stanley Hunterton, Bar Counsel

By: \_\_\_\_\_

  
Jason R. Dworin, Assistant Bar Counsel  
Nevada Bar No. 9006  
3100 W. Charleston Boulevard Suite 100  
Las Vegas, Nevada 89102  
(702) 382-2200

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Complaint & Docs



STATE BAR OF NEVADA  
3100 W. Charleston Blvd Ste 100  
Las Vegas, NV 89102  
[www.nvbar.org](http://www.nvbar.org)

• Sender: Please print your name, address and ZIP code in this box.

ATTN: Tiffany Bradley  
Discipline Department

SBN Exhibit 1 Page 012

**SENDER: COMPLETE THIS SECTION**

- ☐ Complete items 1, 2, and 3.
- ☐ Print your name and address on the reverse so that we can return the card to you.
- ☐ Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Jeremy T. Bergstrom, Esq.  
9555 S. Eastern Avenue, Ste. 200  
Las Vegas, NV 89123

2. Article Number (Transfer from service label)

7016 1970 0000 9931 0803

PS Form 3811, July 2015 PSN 7530-02-000-9053

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

☒ X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

TATIANA PAPA

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below:

☒ No

APR 11 2018

STATE BAR OF NEVADA

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☒ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over \$500)

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☒ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

Exhibit 1 - Page 01





FILED

APR 05 2018

STATE BAR OF NEVADA  
BY: S. Dur  
OFFICE OF BAR COUNSEL

STATE BAR OF NEVADA  
SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,

Complainant,

vs.

JEREMY T. BERGSTROM, ESQ.,

NV Bar No. 6904,

Respondent.

AFFIDAVIT OF SERVICE

STATE OF NEVADA )

)§.

COUNTY OF CLARK )

Tiffany Bradley, under penalty of perjury, being first and duly sworn, deposes and says as follows:

1. That Affiant is employed by the State Bar of Nevada and, in such capacity; Affiant is Custodian of Records for the Discipline Department of the State Bar of Nevada.

2. That Affiant states that the enclosed documents are true and correct copies of the COMPLAINT, DESIGNATION OF HEARING PANEL MEMBERS, STATE BAR'S PEREMPTORY CHALLENGES, DISCIPLINARY RULES OF PROCEDURE, ADKT 516 and ADKT 518 in the matter of the *State Bar of Nevada vs. Jeremy T. Bergstrom, Esq.*, Case No. OBC17-1050.

3. That pursuant to Supreme Court Rule 109, the COMPLAINT, DESIGNATION OF HEARING PANEL MEMBERS, STATE BAR'S PEREMPTORY CHALLENGES, DISCIPLINARY RULES OF PROCEDURE, ADKT 516 and ADKT 518 were served on the

following by placing copies in an envelope which was then sealed and postage fully prepaid for regular and certified mail, and deposited in the United States mail at Las Vegas, Nevada to:

Jeremy T. Bergstrom, Esq.  
9555 S. Eastern Avenue, Ste. 200  
Las Vegas, NV 89123

**CERTIFIED MAIL: 7016 1970 0000 9931 0803**

Dated this 5<sup>th</sup> day of April, 2018.

Tiffany Bradley, an employee of the State Bar of Nevada

SUBSCRIBED AND SWORN to before  
me on this 5th day of April, 2018.

NOTARY PUBLIC  
COUNTY OF CLARK  
STATE OF NEVADA



7036 1970 0000 9931 0803

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT Domestic Mail Only	
For delivery information, visit our website at <a href="http://www.usps.com">www.usps.com</a> ®.	
OFFICIAL USE	
Certified Mail Fee	\$
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$
Postage	\$
Total Postage	\$
Sent To	Jeremy T. Bergstrom, Esq.
Street and	9555 S. Eastern Avenue, Ste. 200
City, State	Las Vegas, NV 89123
PS Form 3800, September 2009 Edition	

**MAILED**  
04/05/18  
TB

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APR 12 2018

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OBC17-1050  
Formal Hearing  
Complaint & Docs

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STATE BAR OF NEVADA  
3100 W. Charleston Blvd Ste 100  
Las Vegas, NV 89102  
[www.nvbar.org](http://www.nvbar.org)

ATTN: Tiffany Bradley  
Discipline Department

SBN Exhibit 1 Page 017



**SENDER: COMPLETE THIS SECTION**

- Complete Items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Jeremy T. Bergstrom, Esq.  
9555 S. Eastern Avenue, Ste. 200  
Las Vegas, NV 89123

2. Article Number (Transfer from service label)

7016 1970 0000 9931 0803

PS Form 3811, July 2015 PSN 7530-02-000-9053

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X

- ☐ Agent
- ☐ Addressee

B. Received by (Printed Name)

TATIANA PAPA

C. Date of Delivery

D. Is delivery address different from item 1? If YES, enter delivery address below:

- ☐ Yes
- ☒ No

APR 11 2018

STATE BAR OF NEVADA

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over \$500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☒ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

Exhibit 1 - Page 018

Domestic Return Receipt

Case No.: OBC17-1050



FILED

MAY 02 2018

STATE BAR OF NEVADA  
SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA  
BY: *[Signature]*  
OFFICE OF BAR COUNSEL

STATE BAR OF NEVADA.

Complainant.

vs.

JEREMY T. BERGSTROM.

NV Bar No. 6904.

Respondent.

NOTICE OF INTENT TO DEFAULT

TO: Jeremy T. Bergstrom  
9555 S. Eastern Avenue, Ste. 200  
Las Vegas, NV 89123

PLEASE TAKE NOTICE THAT unless the State Bar receives a responsive pleading in the above-captioned matter by **Tuesday, May 22, 2018**, pursuant to State Bar Disciplinary Rule of Procedure 14(c), it will proceed on a default basis and *the charges against you shall be deemed admitted*. Supreme Court Rule 105 (2) states in relevant part:

A copy of the complaint shall be served on the attorney and it shall direct that a verified response or answer be served on bar counsel within 20 days of service . . . In the event the attorney fails to plead, **the charges shall be deemed admitted**; provided, however, that an attorney who fails to respond within the time provided may thereafter obtain permission of the appropriate disciplinary board chair to do so, if failure to file is attributable to mistake, inadvertence, surprise, or excusable neglect. (Emphasis added.)

///

///

///

1 Additional copies of the Complaint previously served upon you, and the First Designation  
2 of Hearing Panel Members, accompanies this Notice.

3 Dated this 2<sup>nd</sup> day of May, 2018.

4 **STATE BAR OF NEVADA**  
5 C. Stanley Hunterton, Bar Counsel

6 By: 

7 Jason R. Dworin, Assistant Bar Counsel  
8 Nevada Bar No. 9006  
9 3100 W. Charleston Boulevard Suite 100  
10 Las Vegas, Nevada 89102  
11 (702) 382-2200  
12  
13  
14  
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25

1 CERTIFICATE OF SERVICE

2 The undersigned hereby certifies a true and correct copy of the foregoing NOTICE OF  
3 INTENT TO DEFAULT was deposited in the United States Mail at Las Vegas, Nevada, postage fully  
4 pre-paid thereon for first-class regular mail addressed to:

5 Jeremy T. Bergstrom  
9555 S. Eastern Avenue, Ste. 200  
Las Vegas, NV 89123  
(SCR 79 address)  
6 Certified Mail: 7018 0040 0000 8193 8175

7 Jeremy T. Bergstrom  
1505 Via Cassia  
8 Henderson, 89052-4121

9 and via email to:

- 10 1. Respondent: [jbergstrom@jbergstromlaw.com](mailto:jbergstrom@jbergstromlaw.com); [tpapa@bergstromlaw.com](mailto:tpapa@bergstromlaw.com);  
[info@jbergstromlaw.com](mailto:info@jbergstromlaw.com);

11 DATED this 3rd day of May, 2018.

12  
13 By: 

14 Tiffany Bradley, an employee of  
the State Bar of Nevada.  
15  
16  
17  
18  
19  
20  
21



7018 0040 0000 8193 8175

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Certified Mail Fee \$ \_\_\_\_\_

Extra Services & Fees (check box, add fee as appropriate)

<input type="checkbox"/> Return Receipt (hardcopy)	\$ _____
<input type="checkbox"/> Return Receipt (electronic)	\$ _____
<input type="checkbox"/> Certified Mail Restricted Delivery	\$ _____
<input type="checkbox"/> Adult Signature Required	\$ _____
<input type="checkbox"/> Adult Signature Restricted Delivery	\$ _____

Postage \$ \_\_\_\_\_

Total Postage \$ \_\_\_\_\_

Sent To Jeremy T. Bergstrom

Street and Apt. 9555 S. Eastern Avenue, Ste. 200

City, State, ZIP Las Vegas, NV 89123

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

**MAILED**  
05/02/18  
Postmark  
Las Vegas, NV  
Notice of Intent TB

LAS VEGAS

MAY 03 2018

04 MAY '18

PM 3:11



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United States

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MAY 08 2018

OFFICE OF BAR COUNSEL



STATE BAR OF NEVADA

3100 W. Charleston Blvd Ste 100

Las Vegas, NV 89102

[www.nvbar.org](http://www.nvbar.org)

OBC17-1050

Formal Hearing

Notice of Intent to Default

ATTN: Tiffany Bradley  
Discipline Department

SBN Exhibit 1 Page 023

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Jeremy T. Bergstrom  
9555 S. Eastern Avenue, Ste. 200  
Las Vegas, NV 89123

2. Article Number: *Transfer from outside label*

7018 0040 0000 8193 8175

PS Form 3811, July 2015 PSN 7530-02-000-9053

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

*[Handwritten Signature]*

☐ Agent  
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1?  
If YES, enter delivery address below: ☐ Yes ☐ No

**RECEIVED BY**

MAY 07 2018

3. Service Type

**STATE BAR OF NEVADA**

- |  |   |
|--|---|
| <input type="checkbox"/> Adult Signature                               | <input type="checkbox"/> Priority Mail Express®                     |
| <input type="checkbox"/> Adult Signature Restricted Delivery           | <input type="checkbox"/> Registered Mail™                           |
| <input checked="" type="checkbox"/> Certified Mail®                    | <input type="checkbox"/> Registered Mail Restricted Delivery        |
| <input type="checkbox"/> Certified Mail Restricted Delivery            | <input checked="" type="checkbox"/> Return Receipt for Merchandise  |
| <input type="checkbox"/> Collect on Delivery                           | <input type="checkbox"/> Signature Confirmation™                    |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery       | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Insured Mail                                  |   |
| <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) |   |

Domestic Return Receipt

SBN Exhibit 1 - Page 024



FILED

Case No.: OBC17-1050

MAY 14 2018

STATE BAR OF NEVADA

BY: Shirley R.  
OFFICE OF BAR COUNSEL

STATE BAR OF NEVADA

SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,

Complainant,

vs.

JEREMY T. BERGSTROM, ESQ.  
NV BAR No. 6904  
Respondent.

ORDER APPOINTING  
HEARING PANEL CHAIR

IT IS HEREBY ORDERED that the following member of the Southern Nevada  
Disciplinary Board has been designated as the Hearing Panel Chair.

I. Dawn Lozano, Esq., Chair

DATED this 14th day May, 2018.

STATE BAR OF NEVADA

By: [Signature]

Luke Puschnig, Esq.  
Nevada Bar No. 3792  
Chair of Southern Nevada Disciplinary Board



1 CERTIFICATE OF SERVICE

2 The undersigned hereby certifies a true and correct copy of the foregoing **ORDER**  
3 **APPOINTING HEARING PANEL CHAIR** was deposited in the United States Mail at Las Vegas,  
4 Nevada, postage fully pre-paid thereon for first-class regular mail addressed to:


5 Jeremy T. Bergstrom  
9555 S. Eastern Avenue, Ste. 200  
Las Vegas, NV 89123  
(SCR 79 address)  
6 **Certified Mail: 7018 0040 0000 8193 8151**

7 Jeremy T. Bergstrom  
1505 Via Cassia  
8 Henderson, 89052-4121

9 *and via email to:*

10 1. Respondent: jbergstrom@jbergstromlaw.com; tpapa@bergstromlaw.com;  
info@jbergstromlaw.com;

11 DATED this 14<sup>th</sup> day of May, 2018.

12  
13 By:   
14 Tiffany Bradley, an employee of  
the State Bar of Nevada.  
15  
16  
17  
18  
19  
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21

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Order Appt. Chair

MAILED  
 5/14/18

Jeremy T. Bergstrom  
 9555 S. Eastern Avenue, Ste. 200  
 Las Vegas, NV 89123

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY		
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature  <input checked="" type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name)</p> <p>C. Date of Delivery</p>		
<p>1. Article Addressed to:</p> <p>Jeremy T. Bergstrom            9555 S. Eastern Avenue, Ste. 200            Las Vegas, NV 89123</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes            If YES, enter delivery address below: <input type="checkbox"/> No</p> <p><b>RECEIVED BY</b>  <b>MAY 18 2018</b>  <b>STATE BAR OF NEVADA</b></p>		
<p>2. Article Number (Transfer from service label)            7018 0040 0000 8193 8151</p>	<p>3. Service Type</p> <table border="0"> <tr> <td> <input type="checkbox"/> Adult Signature  <input type="checkbox"/> Adult Signature Restricted Delivery  <input checked="" type="checkbox"/> Certified Mail  <input type="checkbox"/> Certified Mail Restricted Delivery  <input type="checkbox"/> Collect on Delivery  <input type="checkbox"/> Collect on Delivery Restricted Delivery  <input type="checkbox"/> Insured Mail  <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)               </td> <td> <input type="checkbox"/> Priority Mail Express®  <input type="checkbox"/> Registered Mail™  <input type="checkbox"/> Registered Mail Restricted Delivery  <input checked="" type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Signature Confirmation™  <input type="checkbox"/> Signature Confirmation Restricted Delivery               </td> </tr> </table>	<input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	<input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery
<input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	<input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery		
<p>PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt</p>			

Case No.: OBC17-1050



FILED

MAY 15 2018

STATE BAR OF NEVADA  
SOUTHERN NEVADA DISCIPLINARY BOARD  
OFFICE OF BAR COUNSEL

STATE BAR OF NEVADA,

Complainant,

vs.

JEREMY T. BERGSTROM, ESQ.,  
NV Bar No. 6904,  
Respondent.

NOTICE OF TELEPHONIC INITIAL  
CASE CONFERENCE

TO: Jeremy T. Bergstrom, Esq.  
9555 S. Eastern Avenue, Ste. 200  
Las Vegas, NV 89123

PLEASE TAKE NOTICE, the telephonic Initial Case Conference in the above-entitled matter is set for Thursday, May 31, 2018, at 3:00 p.m. The State Bar conference call number is (877) 594-8353, participant passcode is 46855068 then #.

Dated this 15<sup>th</sup> day of May, 2018.

STATE BAR OF NEVADA  
C. Stanley Hunterton, Bar Counsel

By:

Jason R. Dworin, Assistant Bar Counsel  
Nevada Bar No. 9006  
3100 W. Charleston Boulevard Suite 100  
Las Vegas, Nevada 89102  
(702) 382-2200

Case No.: OBC17-1050



FILED

MAY 15 2018

STATE BAR OF NEVADA  
SOUTHERN NEVADA DISCIPLINARY BOARD  
By: S. R.  
OFFICE OF BAR COUNSEL

STATE BAR OF NEVADA,

Complainant,

vs.

JEREMY T. BERGSTROM, ESQ.,  
NV Bar No. 6904,  
Respondent.

NOTICE OF TELEPHONIC INITIAL  
CASE CONFERENCE

TO: Jeremy T. Bergstrom, Esq.  
9555 S. Eastern Avenue, Ste. 200  
Las Vegas, NV 89123

PLEASE TAKE NOTICE, the telephonic Initial Case Conference in the above-entitled matter is set for **Thursday, May 31, 2018, at 3:00 p.m.** The State Bar conference call number is (877) 594-8353, participant passcode is 46855068 then #.

Dated this 15<sup>th</sup> day of May, 2018.

STATE BAR OF NEVADA  
C. Stanley Hunterton, Bar Counsel

By:

[Signature]  
Jason R. Dworin, Assistant Bar Counsel  
Nevada Bar No. 9006  
3100 W. Charleston Boulevard Suite 100  
Las Vegas, Nevada 89102  
(702) 382-2200



1 CERTIFICATE OF SERVICE

2 The undersigned hereby certifies a true and correct copy of the foregoing NOTICE OF  
3 TELEPHONIC INITIAL CASE CONFERENCE was deposited in the United States Mail at Las  
4 Vegas, Nevada, postage fully pre-paid thereon for first-class regular mail addressed to:

5 Jeremy T. Bergstrom  
9555 S. Eastern Avenue, Ste. 200  
Las Vegas, NV 89123  
(SCR 79 address)  
6 **Certified Mail: 7018 0040 0000 8193 8144**

7 Jeremy T. Bergstrom  
1505 Via Cassia  
8 Henderson, 89052-4121

9 *and via email to:*

- 10 1. Dawn M. Lozano, Esq. (Panel Chair): [lozanolawlv@gmail.com](mailto:lozanolawlv@gmail.com);  
2. Respondent: [jbergstrom@jbergstromlaw.com](mailto:jbergstrom@jbergstromlaw.com); [info@jbergstromlaw.com](mailto:info@jbergstromlaw.com);  
11 3. Jason R. Dworin, Esq. (Assistant Bar Counsel): [jasond@nvbar.org](mailto:jasond@nvbar.org);

12 DATED this 16<sup>th</sup> day of May, 2018.

13 By: 

14 Tiffany Bradley, an employee of  
15 the State Bar of Nevada.  
16  
17  
18  
19  
20  
21

7016 0040 0000 8193 8144

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<input type="checkbox"/> Return Receipt (hardcopy)	\$ _____
<input type="checkbox"/> Return Receipt (electronic)	\$ _____
<input type="checkbox"/> Certified Mail Restricted Delivery	\$ _____
<input type="checkbox"/> Adult Signature Required	\$ _____
<input type="checkbox"/> Adult Signature Restricted Delivery	\$ _____

Postage  
 \$ \_\_\_\_\_

Total Postage at \_\_\_\_\_

Sent To \_\_\_\_\_

Street and Apt. # \_\_\_\_\_

City, State, ZIP+ \_\_\_\_\_

**MAILED**  
 5/16/18 PB  
 Notice of ICC

PS Form 3800, April 2015 PSN 753-002-000-9047 See Reverse for Instructions

RECEIVED

First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G400

MAY 22 2016

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OFFICE OF BAR COUNSEL



STATE BAR OF NEVADA

3100 W. Charleston Blvd Ste 100

Las Vegas, NV 89102

[www.nvbar.org](http://www.nvbar.org)

OBC17-1050

Formal Hearing  
ATTN: Tiffany Bradley  
Notice of ICC  
Discipline Department

SBN Exhibit 1 Page 031

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Jeremy T. Bergstrom  
9555 S. Eastern Avenue, Ste. 200  
Las Vegas, NV 89123

2. Article Number (Transfer from service label)

7018 0040 0000 8193 8144

PS Form 3811, July 2015 PSN 7530-02-000-9053

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

*[Handwritten Signature]*

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1?  
If YES, enter delivery address below

☐ Yes  
☒ No

MAY 21 2018

STATE BAR OF NEVADA

3. Service Type

- |  |   |
|--|---|
| <input type="checkbox"/> Adult Signature                               | <input type="checkbox"/> Priority Mail Express®                     |
| <input type="checkbox"/> Adult Signature Restricted Delivery           | <input type="checkbox"/> Registered Mail™                           |
| <input checked="" type="checkbox"/> Certified Mail®                    | <input type="checkbox"/> Registered Mail Restricted Delivery        |
| <input type="checkbox"/> Certified Mail Restricted Delivery            | <input checked="" type="checkbox"/> Return Receipt for Merchandise  |
| <input type="checkbox"/> Collect on Delivery                           | <input type="checkbox"/> Signature Confirmation™                    |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery       | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Insured Mail                                  |   |
| <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) |   |

Domestic Return Receipt

Exhibit 1 - Page 032





FILED

MAY 22 2018

STATE BAR OF NEVADA  
SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA  
BY: S. Dur  
OFFICE OF BAR COUNSEL

STATE BAR OF NEVADA,

OBC17-1050

Plaintiff,

ANSWER

vs.

JEREMY T. BERGSTROM, ESQ.

Respondent.

Comes now Respondent, in proper person, and answers Plaintiff's Complaint as follows.

1. Answering Paragraph One, Respondent admits he is an attorney in the state of Nevada under bar number 6904. Respondent denies any wrongdoing and acts of misconduct in Clark County or anywhere else.

2. Answering Paragraph Two, Respondent admits that his law firm domesticated an Oregon judgment in Nevada. He further admits receipt of \$5,000 from Jacobs, although this sum did not represent a retainer as described in the Complaint. It represented a flat fee for the domestication and subsequent collection efforts. Respondent denies that he "did nothing else, while misrepresenting his actions to Jacobs and Lee."

3. Answering Paragraph Three, Respondent is without sufficient knowledge to

1 answer when Jacobs' grievance was received. Respondent admits that Ng was suspected  
2 to own property in Las Vegas. However, Respondent denies that Ng was suspected to be  
3 living in Las Vegas. Instead, Ng was suspected to be living overseas in Asia. Ng's time  
4 in Las Vegas was believed to be limited to sporadic gambling trips, during which Ng was  
5 believed to stay at high end strip casinos.

6  
7 4. Answering Paragraph Four, Respondent admits that the scope of services were  
8 described only in an unsigned agreement. Respondent admits that the fee agreement  
9 described is consistent with his understanding.

10 5. Answering Paragraph Five, Respondent is without sufficient knowledge to  
11 answer when the retainer was mailed. Respondent admits receipt of the \$5,000.00 check,  
12 which is being returned/and refunded back to Jacobs minus only the court costs incurred  
13 in the domestication action, which costs were \$292.99, resulting in a refund of \$4,707.01  
14 that is being mailed to Jacobs at this time.

15 6. Answering Paragraph Six, Respondent denies the allegation insofar as it  
16 identified the filing date as April 1, 2016. The foreign judgment was filed on March 30,  
17 2016.

18 7. Answering Paragraph Seven, Respondent admits that he sent an e-mail to the  
19 client containing the cited language. The e-mail also addressed typical practices engaged  
20 in by high stakes gamblers, often times described in the casino industry as whales. Ng  
21 was described as such a person during the preliminary communications with the client.  
22

23 8. Answering Paragraph Eight, Respondent admits that he e-mailed the client on  
24

1 or around May 11, 2016. Respondent notes that despite the references to "playing catch  
2 up", "apologizing", and being "out of commission," the statutory 30-day injunction  
3 against enforcement of the domesticated Oregon judgment expired only a few days prior.

4 9. Answering Paragraph Nine, Respondent admits that he e-mailed the client on  
5 June 23, 2016 as described.

6 10. Answering Paragraph Ten, Respondent admits that he e-mailed the client on  
7 January 17, 2017 as described.

8 11. Answering Paragraph Eleven, Respondent states that the quoted excerpts from  
9 the January 17, 2017 e-mail appear to be accurate.

10 12. Answering Paragraph Twelve, Respondent is without sufficient knowledge to  
11 answer. Respondent states that at no time did he mean any disrespect or offense towards  
12 the State Bar. Respondent further states that he is unfamiliar with the State Bar  
13 disciplinary and investigative procedures and the duties counsel has with regard to the  
14 same and that any and all non-compliance was a result of that ignorance rather than an  
15 intent to purposefully violate any such rules or to offend the State Bar. Respondent has  
16 been a practicing attorney in Nevada for roughly twenty (20) years and, during that time,  
17 has never been reprimanded, disciplined or sanctioned by the State Bar. Further,  
18 Respondent has never been the subject of any prior bar complaints at any time during  
19 those twenty years (that he can recall). Thus, the entire process is foreign to Respondent.  
20 By way of this Answer, Respondent would like to apologize to all involved with this  
21 matter for any headaches or wasted time he may have caused anyone.

22 13. Answering Paragraph Thirteen, Respondent is without sufficient knowledge  
23  
24

1 to answer. Respondent states that at no time did he mean any disrespect or offense  
2 towards the state bar. Respondent further states that Bardis was terminated from her  
3 employment at the firm months ago.

4 14. Answering Paragraph Fourteen, Respondent is without sufficient knowledge  
5 to answer. Respondent states that at no time did he mean any disrespect or offense  
6 towards the state bar. Respondent further states that Bardis was terminated from her  
7 employment at the firm months ago.

8 15. Answering Paragraph Fifteen, Respondent was unaware of these judgments  
9 until reading the Complaint. The judgments were purportedly obtained via default.  
10 Respondent will address these judgments in the immediate future. Respondent is unclear  
11 how these judgments are relevant to the grievance filed by Jacobs.

12 16. Answering Paragraph Sixteen, Respondent states that, as represented in the  
13 January 17, 2017 e-mail cited in Paragraph Ten, the forced sale process had begun at the  
14 time the properties were sold. Specifically, writs of execution regarding both the  
15 Raspberry Hill property and the Elaine property were sent to Court for issuance on or  
16 around January 12, 2017. Both of these writs were ultimately issued by the Court  
17 thereafter, the Elaine writ on January 19, 2017 and the Raspberry Hill writ on January 30,  
18 2017. The Elaine issued writ was received by Respondent on or around January 30,  
19 2017. The Raspberry Hill issued writ was received by Respondent on February 1, 2017.  
20 Upon receipt of the issued writs and prior to service of the writs, Respondent reviewed  
21 the public records and learned of the transfers of title of both properties. Those transfers  
22 rendered the writs ineffectual, and as a result, service of the writs was cancelled.  
23  
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1 Respondent notes that the likelihood of success of either of the writs, had the title  
2 transfers not occurred, is unknown and speculative. The likelihood of success is not  
3 known, and was not known, because the extent of the liens against both properties was  
4 not known. In order to cause a forced execution sale of real property, the expected sales  
5 price must exceed the amount of all liens that were senior to the judgment plus the  
6 expected costs of sale. A Zillow.com valuation of Raspberry Hill produced a  
7 \$183,720.00 value. A Zillow.com valuation of Elaine produced a \$149,556.00 value.  
8 Thus, even if both properties were entirely free and clear of all liens and both properties  
9 were sold at execution sale, the judgment would not have been satisfied in full. In the  
10 event the properties were encumbered such that they had little to no equity, the properties  
11 would not have produced any recovery towards the judgment balance. In the event the  
12 properties had an equity cushion in some amount, the properties may have produced  
13 some recovery towards the judgment balance, but speculation and conjecture would be  
14 required to guestimate what the amount may have been. The point is that it cannot be  
15 presumed or concluded that the properties would have produced revenue that would have  
16 reduced the judgment balance had the transfers not taken place.  
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18 17. Answering Paragraph Seventeen, Respondent admits the statements contained  
19 therein.

20 18. Answering Paragraph Eighteen, Respondent denies the allegations contained  
21 therein.  
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1  
2 **PRAYER FOR RELIEF**  
3

4 1. Answering Paragraph One, Two and Three of the prayer for relief,  
5 Respondent denies that any relief is appropriate and requests that the matter be  
6 summarily adjudicated in his favor with no findings of wrongdoing being issued.

7 DATED this 22<sup>nd</sup> day of May 2018.

8  
9 By: 

10 \_\_\_\_\_  
11 Jeremy T. Bergstrom, Esq.  
12 Nevada Bar No. 6904  
13 9555 S. Eastern Ave., Suite 200  
14 Las Vegas Vegas, NV  
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1                    VERIFICATION

2                    The undersigned hereby states that the above statements are true and correct to the  
3 best of his knowledge and that the statements are based upon personal knowledge.

4  
5                    By: 

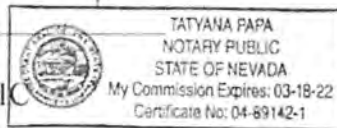
6                    Jeremy T. Bergstrom, Esq.  
7                    Nevada Bar No. 6904  
8                    9555 S. Eastern Ave., Suite 200  
9                    Las Vegas Vegas, NV

10  
11  
12                    STATE OF NV     ?  
13                    COUNTY OF CLARK }

14  
15                    Subscribed and sworn before me TATYANA PAPA on the 22 day of May, 2018, by  
16                    Jeremy T. Bergstrom, Esq.,

17                    

18                    NOTARY PUBLIC





FILED

JUN 01 2018

STATE BAR OF NEVADA

BY: Justin R.  
OFFICE OF BAR COUNSEL

Case No.: OBC17-1050

STATE BAR OF NEVADA  
SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,

Complainant,

vs.

JEREMY T. BERGSTROM, ESQ.,

NV Bar No. 6904,

Respondent.

SCHEDULING ORDER

Pursuant to Rule 17 of the Disciplinary Rules of Procedure ("DRP"), on Thursday, May 31, 2018, at 3:00 p.m., Dawn M. Lozano, Esq., the Formal Hearing Panel Chair, met telephonically with Jason R. Dworin, Esq., Assistant Bar Counsel, on behalf of the State Bar of Nevada, and Respondent, to conduct the Initial Conference in this matter.

During the Initial Conference the parties discussed initial disclosures, discovery issues, the potential for resolution of this matter prior to the hearing, a status conference, and the hearing date.

The parties agreed to the following:

1. All documents shall be served electronically and via U.S. by the parties pursuant to SCR 109(2) and DRP 11(b)(3).

2. The formal hearing for this matter is hereby set for one (1) day **starting at 9:00 a.m. on Wednesday, July 25, 2018**, and shall take place at Litigation Services located at 3770 Howard Hughes Parkway, Suite 300, Las Vegas, NV 89169. The parties have stipulated to hearing dates set forth above.



1           3.     On or before **June 7, 2018, at 5:00 p.m.** the State Bar of Nevada's initial  
2 disclosures shall be served on all parties. The documents provided by the State Bar shall be bates  
3 stamped with numerical designations. *See* DRP 17 (a).

4           4.     On or before **June 15, 2018, at 5:00 p.m.** Respondent's initial disclosures shall be  
5 served on all parties. The documents provided by the Respondent shall be bates stamped with  
6 alphabetical exhibit designations. *See* DRP 17 (a).

7           5.     The Panel Chair has discussed the possibility of mediation with the parties.

8           6.     On or before **June 22, 2018, at 5:00 p.m.** the parties shall file and serve any  
9 Motions, excluding motions in limine (and also excluding motions to dismiss (*see* DRP 15)).

10          7.     On or before **July 2, 2018**, all oppositions to the Motions, if any, shall be filed and  
11 served on the parties.

12          8.     On or before **July 9, 2018**, all replies to any opposition, if any, shall be filed and  
13 served on the parties.

14          9.     On or before **June 25, 2018**, the parties shall serve a Final Designation of witnesses  
15 expected to testify and exhibits expected to be presented at the Formal Hearing in this matter,  
16 pursuant to SCR 105(2)(d), DRP 17(a) and DRP 21.

17          All documents disclosed shall be bates stamped, the State Bar will use numerical exhibit  
18 designations and Respondent will use alphabetical exhibit designations, pursuant to DRP 17.

19          10.    On **Wednesday, July 18, 2018, at 3:00 p.m.** the parties shall meet telephonically  
20 with Chair Lozano for the Pre-hearing Conference. The parties shall use the State Bar conference  
21 bridge (877) 594-8353 and the passcode is 46855068 #.

22          Pursuant to DRP 23, at the Pre-hearing conference (i) the parties shall discuss all matters  
23 needing attention prior to the hearing date, (ii) the Chair may rule on any motions or disputes  
24 including motions to exclude evidence, witnesses, or other pretrial evidentiary matter, and (iii) the  
25 parties shall discuss and determine stipulated exhibits proffered by either the State Bar or  
Respondent as well as a stipulated statement of facts, if any.

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11. The parties stipulate that venue is proper in Clark County.

12. The parties stipulate to waive SCR 105(2)(d) to allow for the formal appointment of the remaining hearing panel members on a date that is greater than 45 days prior to the scheduled hearing.

Based on the parties' verbal agreement to the foregoing during the telephonic Initial Conference and good cause appearing, **IT IS SO ORDERED.**

Dated this 1<sup>st</sup> day of June, 2018.

SOUTHERN NEVADA DISCIPLINARY BOARD

By: Dawn M. Lozano  
Dawn M. Lozano, Esq.  
Formal Hearing Panel Chair

1 CERTIFICATE OF SERVICE


2 The undersigned hereby certifies a true and correct copy of the foregoing **SCHEDULING**  
3 **ORDER** was deposited in the United States Mail at Las Vegas, Nevada, postage fully pre-paid thereon  
4 for first-class regular mail addressed to:

5 Jeremy T. Bergstrom, Esq.  
6 9555 S. Eastern Avenue, Ste. 200  
7 Las Vegas, NV 89123  
8 (SCR 79 address)

9 *and via email to:*

- 10 1. Dawn M. Lozano, Esq. (Panel Chair): [lozanolawlv@gmail.com](mailto:lozanolawlv@gmail.com);  
11 2. Respondent: [jbergstrom@jbergstromlaw.com](mailto:jbergstrom@jbergstromlaw.com); [info@jbergstromlaw.com](mailto:info@jbergstromlaw.com);  
12 3. Ann C. Elworth, Esq. (Assistant Bar Counsel): [anne@nvbar.org](mailto:anne@nvbar.org);

13 DATED this 4<sup>th</sup> day of June, 2018.

14 By:   
15 Tiffany Bradley, an employee of  
16 the State Bar of Nevada.  
17  
18  
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21



FILED

JUN 07 2018

STATE BAR OF NEVADA  
BY: S. R. R.  
OFFICE OF BAR COUNSEL

STATE BAR OF NEVADA  
SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,

Complainant,

vs.

JEREMY T. BERGSTROM, ESQ.,  
Nevada Bar No. 6904,  
Respondent.

STATE BAR'S INITIAL SUMMARY OF  
EVIDENCE AND DISCLOSURE OF  
WITNESSES FOR FORMAL HEARING

TO: Jeremy T. Bergstrom, Esq.  
9555 S. Eastern Avenue, Ste. 200  
Las Vegas, NV 89123

PLEASE TAKE NOTICE that the following is an initial list of witnesses and initial summary of evidence which may be offered against Respondent at the time of the Formal Hearing, in the above-entitled complaint.

**A. Documentary Evidence**

Attached hereto is the State Bar's Exhibit List of proposed date-stamped exhibits being submitted to Respondent on disk via U.S. mail.

1. Any and all documentation contained in the State Bar of Nevada's files including but not limited to, correspondence, emails, memorandums, text messages, notes, payments, invoices, bank records, receipts, billing entries and pleadings regarding grievance file number OBC17-1050.

2. Any and all documentation contained in *Neilson Lee vs. Ng, et al.*, Case No. A-16-734246-F.



3. Any and all documentation contained in records of the State Bar of Nevada regarding Respondent's licensure, compliance with reporting requirements, and disciplinary history.

The State Bar reserves the right to supplement this list as necessary.

Exhibit#	Document	Bates Stamped
1.	Formal Hearing Packet	will be produced prior to hearing pursuant to DRP 32
2.	Affidavit of Prior Discipline	will be produced at the time of hearing
3.	State Bar of Nevada's Grievance File	SBN Exhibit 3 001-014
4.	State of Oregon - General Judgment, Case No. 15CV33982	SBN Exhibit 4 001-002
5.	Nevada District Court -Application of Foreign Judgment, Case No. A-16-734246-F	SBN Exhibit 5 001-010
6.	Clark County Assessor Records for 2059 Raspberry Hill Road	SBN Exhibit 6 001-006
7.	Clark County Assessor Records for 1711 Elaine Drive	SBN Exhibit 7 001-006
8.	Refund check in the amount of \$4,707.01	SBN Exhibit 8 001

The State Bar incorporates by reference all documents identified by Respondent in this matter.

**B. Witnesses**

1. Respondent will be called and would be expected to testify regarding his conduct and communications surrounding the events related to, and any and all documents pertinent to, each of the charged Rules of Professional Conduct, including but not limited to facts pertaining to the breach of his professional responsibilities as an attorney, his mental state pursuant to ABA Standards, the harm resulting from his conduct, and any aggravating and mitigating factors pursuant to Supreme Court Rule 102.5.

2. David A. Jacobs, Esq., may be called and would be expected to testify regarding the facts and circumstances surrounding the grievance.

3. Neilson Lee may be called and would be expected to testify regarding the facts and circumstances surrounding the grievance.

4. Benjamin Wang, Esq., may be called and would be expected to testify regarding the facts and circumstances surrounding the grievance.

5. Ivan Baric may be called and would be expected to testify regarding the facts and circumstances surrounding the grievance.

6. State Bar Investigator, Suzanne Farrell, is anticipated to testify concerning her interactions with the Grievant, attempts to secure cooperation from Respondent, her investigation of the charged Grievance, Office of Bar Counsel investigation procedures, her investigation, review of documents acquired and maintained by the Office of Bar Counsel pertinent to any and all relevant facts, issues, and documentation.

7. A representative of the State Bar of Nevada Office of Bar Counsel is expected to testify as Custodian of Records and provide testimony regarding Respondent's license and discipline history.

The State Bar reserves the right to supplement this witness list as necessary.

DATED this 7 day of June, 2018.

STATE BAR OF NEVADA

By: Ann C. Elworth  
Ann C. Elworth, Assistant Bar Counsel  
Nevada Bar No. 6338  
3100 W. Charleston Blvd, Ste. 100  
Las Vegas, Nevada 89102

1 CERTIFICATE OF SERVICE

2 The undersigned hereby certifies a true and correct copy of the foregoing STATE BAR'S  
3 INITIAL SUMMARY OF EVIDENCE AND DISCLOSURE OF WITNESSES FOR FORMAL  
4 HEARING was deposited in the United States Mail at Las Vegas, Nevada, postage fully pre-paid  
thereon for first-class regular mail addressed to:

5 Jeremy T. Bergstrom, Esq.  
6 9555 S. Eastern Avenue, Ste. 200  
Las Vegas, NV 89123  
(SCR 79 address)

7 and via email to:

- 8 1. Dawn M. Lozano, Esq. (Panel Chair): [lozanolawlv@gmail.com](mailto:lozanolawlv@gmail.com);  
9 2. Respondent: [jbergstrom@jbergstromlaw.com](mailto:jbergstrom@jbergstromlaw.com); [info@jbergstromlaw.com](mailto:info@jbergstromlaw.com);  
10 3. Ann C. Elworth, Esq. (Assistant Bar Counsel): [anne@nvbar.org](mailto:anne@nvbar.org);

11 DATED this 7<sup>th</sup> day of June, 2018.

12  
13 By: 

Tiffany Bradley, an employee of  
the State Bar of Nevada.

Case No: OBC17-1050



FILED

JUN 20 2018

STATE BAR OF NEVADA  
BY: *[Signature]*  
OFFICE OF BAR COUNSEL

STATE BAR OF NEVADA  
SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,

Complainant,

vs.

JEREMY T. BERGSTROM, ESQ.,  
NEVADA BAR No. 6904

Respondent.

BRIEF IN SUPPORT OF TELEPHONIC  
TESTIMONY

The State Bar of Nevada, through Assistant Bar Counsel Ann Elworth, hereby requests that out-of-state witnesses be allowed to testify telephonically.

This request is supported by the following Memorandum of Points and Authorities and any oral argument requested by the Chair.

**MEMORANDUM OF POINTS AND AUTHORITIES**

The State Bar of Nevada seeks to have grievant, David Jacobs, Esq., his client, Nielsen Lee, and witness, Benjamin Wang, Esq., testify telephonically in the above-referenced matter. This request is based on the fact that all three witnesses live in Oregon, and lived in Oregon at the time that Respondent, Jeremy T. Bergstrom, Esq., ("Respondent") was retained to domesticate Mr. Lee's out-of-state judgment. Respondent took on clients that lived outside Nevada and it should not be the grievants' burden to travel to Nevada in order to have their grievances considered by a Formal Hearing Panel. Respondent believed that he could adequately represent the grievants when they

1 resided out-of-state. There is no reason to require these witnesses to travel to Nevada to testify  
2 regarding relationships each had with Respondent, when these representations were all conducted  
3 from remote locations themselves.

4 **Applicable Legal Authority.**

5 Supreme Court Rules Part IX-B(A) governs appearances by telephonic transmission  
6 equipment for civil and family court proceedings. Rule 2 of Part IX-B(A) states that “to improve  
7 access to the courts and reduce litigation costs, courts shall permit parties, to the extent feasible to  
8 appear by telephonic transmission equipment at appropriate proceedings pursuant to these rules.”

9 The Rules go on to provide that telephonic appearance shall be allowed for (i) Case management  
10 conferences; (ii) trial setting conferences; (iii) hearing on law and motion, except motions in limine;  
11 (iv) hearings on discovery motions (with exceptions), (v) status conferences, (vi) hearings to review  
12 the dismissal of an action, (vii) any other hearing that is scheduled for not more than 15 minutes, and  
13 (viii) any matters stipulated to by the parties and approved by the court. *See* SCR Part IX-B (A),  
14 Rule 4(1). All other matters require personal appearance or appearance by use of simultaneous  
15 audiovisual transmission equipment, although the Court has discretion to modify the rule. *See id.* at  
16 Rule 4(2) and (3).

17 Supreme Court Rules Part IX-B(B) governs appearances by simultaneous audiovisual  
18 transmission equipment (“SAT”) for civil and family court proceedings. These rules are, similarly,  
19 intended to improve access and reduce litigation costs. Rule 4 of this subset of Supreme Court  
20 Rules provides that upon good cause shown SAT appearances may be made at trials, or hearings at  
21 which witnesses are expected to testify.

22 Rule 1(6) defines that “good cause” as consisting of one or more of the following factors:

- 23 (i) whether there is a timely objection by a party or witness to a SAT appearance,  
24 (ii) whether any undue surprise or prejudice would result,  
25 (iii) the convenience of the parties, counsel and court;  
(iv) the cost and time savings;  
(v) the importance and complexity of the proceeding;



- 1 (vi) whether the proponent has been unable, after due diligence, to procure the physical presence  
2 of a witness;  
3 (vii) the convenience to the parties and the proposed witness, and the cost of producing the  
4 witness in relation to the importance of the offered testimony;  
5 (viii) whether the procedure would allow effective cross-examination, especially where  
6 documents and exhibits available to the witness may not be available to counsel;  
7 (ix) the importance of presenting the testimony of witnesses in open court, whether the finder of  
8 fact may observe the demeanor of the witness, and where the solemnity of the surrounding will  
9 impress up on the witness the duty to testify truthfully;  
10 (x) whether the quality of the communication is sufficient to understand the offered testimony;  
11 and  
12 (xi) such other factors as the court may, in each individual case, determine to be relevant.

13 Finally, Rule 43 of the Nevada Rules of Procedure (“NRC P”) provides that “[t]he court may  
14 for good cause shown in compelling circumstances and upon appropriate safeguards, permit  
15 presentation of testimony in open court by contemporaneous transmission from a different location.”  
16 NRC P 43 does not provide a specific means by which such good cause should be shown; to wit, it  
17 does not require a motion be filed to make a request valid.

18 In *Barry v. Linder*, 119 Nev. 661, the Nevada Supreme Court addressed what compelling  
19 circumstances may warrant telephonic testimony. *Barry* was a divorce proceeding, in which the  
20 husband’s income, assets, and debt were at issue. The District Court denied husband’s request to  
21 have a person, allegedly located in Switzerland and unknown to anyone but husband, testify  
22 telephonically about receipt of loan payments made in cash to a company in Brazil. The Supreme  
23 Court reviewed the underlying decision using an abuse of discretion standard. The Court deferred to  
24 the trial court’s authority to control the interrogation of witnesses at trial under NRS 50.115. It also  
25 adopted a “special circumstances standard” for measuring whether telephonic testimony should be  
permitted. *See id.* at 668. The Court listed “exigency or consent and knowledge of the witness’  
identity and credentials” as examples of when special circumstances might exist. *See id.* The Court  
upheld the denial of telephonic testimony by husband’s witness because no exigent circumstances  
were presented and the witness was not an expert who had submitted a report. *See id.*

1 In this proceeding, there is good cause and/or special circumstances to allow the telephonic,  
2 or SAT, testimony of these three out-of-state witnesses.

3 **Application of Law to Fact.**

4 Grievant David Jacobs, Esq. ("Jacobs") is an Oregon licensed attorney who filed a grievance  
5 with the State Bar concerning Respondent's representation of his client, Oregon resident Nielsen  
6 Lee ("Lee"). Oregon attorney Benjamin Wang ("Wang") was Lee's original attorney. Lee, through  
7 Wang, retained Respondent to domesticate and attempt to collect on an Oregon judgment on a  
8 person believed to own property in Nevada. During the entire period of representation, neither  
9 Wang nor Lee traveled to Nevada. Nearly all communications occurred either telephonically or via  
10 email, and the majority of the facts in this case are not in dispute. Therefore, none of the out-of-state  
11 witnesses' telephonic testimony is anticipated to garner any undue surprise or prejudice to  
12 Respondent; the testimony would be consistent with the grievance filed and related correspondence  
13 each submitted to the State Bar. Respondent has had possession of these documents since, at least,  
14 when the Initial Disclosures were provided. These witnesses are Respondent's former client and his  
15 attorneys. They are not unknown third-parties like in *Barry*. Moreover, it would be much more  
16 costly for Lee, Wang and Jacobs to travel to Las Vegas to offer testimony during the scheduled  
17 hearing.

18 Traveling to Las Vegas would also inconvenience these witnesses, without offering any  
19 significant additional value to the hearing. While the Panel may not be able to evaluate every aspect  
20 of their demeanor, technology allows for quality communication in which their tenor and veracity  
21 can be evaluated, and the already marked exhibits can be provided to the witnesses at the remote  
22 location. In addition, the testimony can be deemed verifiable based on the prior correspondence and  
23 documents provided by and to Respondent related to the foreign judgment representation. Finally,  
24 telephonic testimony provides Respondent with a reasonable opportunity to cross-examine the  
25 grievants.


1  
2 There is no reason to question the identity or credentials of the witnesses. Unlike in *Barry*,  
3 the State Bar has no personal interest that will be advanced by offering testimony from a remote  
4 location in the disciplinary proceeding. Moreover, the majority of the grievant witnesses' testimony  
5 is verified from documents already produced in the matter. Finally, the vast majority of the facts to  
6 which these witnesses would testify are not in dispute, and have been admitted in Respondent's  
7 verified answer to the complaint. There is sufficient good cause to allow Lee, Wang and Jacobs to  
8 testify remotely. The State Bar would prefer telephonic testimony because of cost and convenience,  
9 but certainly SAT testimony would be sufficient to meet the needs of the hearing without overly  
10 burdening the grievants.

11 **Conclusion.**

12 Pursuant to SCR Part IX-B and NRCP 43, there is good cause to allow grievants David  
13 Jacobs, Esq., his client, Nielsen Lee, and witness, Benjamin Wang, Esq., to testify telephonically, or  
14 via simultaneous audiovisual transmission, at the Formal Hearing.

15  
16 Dated this 20 day of June, 2018.

17 STATE BAR OF NEVADA  
18 JANEEN V. ISAACSON, Acting Bar Counsel


19  
20 By:   
21 Ann Elworth, Assistant Bar Counsel  
22 3100 W. Charleston Blvd, Ste. 100  
23 Las Vegas, Nevada 89102  
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Jeremy T. Bergstrom, Esq.  
9555 S. Eastern Avenue, Ste. 200  
Las Vegas, NV 89123  
(SCR 79 address)

1. Dawn M. Lozano, Esq. (Panel Chair): [lozanolawlv@gmail.com](mailto:lozanolawlv@gmail.com);
2. Respondent: [jbergstrom@jbergstromlaw.com](mailto:jbergstrom@jbergstromlaw.com); [info@jbergstromlaw.com](mailto:info@jbergstromlaw.com);
3. Ann C. Elworth, Esq. (Assistant Bar Counsel): [anne@nvbar.org](mailto:anne@nvbar.org);

DATED this 20<sup>th</sup> day of June, 2018.

By:  \_\_\_\_\_  
Tiffany Bradley, an employee of  
the State Bar of Nevada.



FILED

JUN 20 2018

Case No.: OBC17-1050

STATE BAR OF NEVADA  
SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA  
BY: S. B. R.  
OFFICE OF BAR COUNSEL

STATE BAR OF NEVADA,

Complainant,

vs.

JEREMY T. BERGSTROM, ESQ.,

NV Bar No. 6904,

Respondent.

NOTICE OF FORMAL HEARING

TO: Jeremy T. Bergstrom, Esq.  
9555 S. Eastern Avenue, Ste. 200  
Las Vegas, NV 89123

PLEASE TAKE NOTICE that the formal hearing in the above-entitled action has been scheduled for **Wednesday, July 25, 2018, at the hour of 9:00 a.m.** The hearing will be conducted at **Litigation Services** located at **3770 Howard Hughes Parkway, Suite 300, Las Vegas, NV 89169.** The parties have stipulated to hearing dates set forth above.

Please be further advised that you are entitled to be represented by counsel, to cross-examine witnesses, and to present evidence.

Dated this 20 day of June, 2018.

STATE BAR OF NEVADA

By:

Ann Elworth  
Ann Elworth, Assistant Bar Counsel  
Nevada Bar No. 6338  
3100 W. Charleston Boulevard Suite 100  
Las Vegas, Nevada 89102  
(702) 382-2200



1 CERTIFICATE OF SERVICE

2 The undersigned hereby certifies a true and correct copy of the foregoing **NOTICE OF**  
3 **FORMAL HEARING** was deposited in the United States Mail at Las Vegas, Nevada, postage fully  
4 pre-paid thereon for first-class regular mail addressed to:

5 Jeremy T. Bergstrom, Esq.  
9555 S. Eastern Avenue, Ste. 200  
Las Vegas, NV 89123  
6 (SCR 79 address)

7 *and via email to:*

- 8 1. Dawn M. Lozano, Esq. (Panel Chair): [lozanolawlv@gmail.com](mailto:lozanolawlv@gmail.com);  
9 2. Respondent: [jbergstrom@jbergstromlaw.com](mailto:jbergstrom@jbergstromlaw.com); [info@jbergstromlaw.com](mailto:info@jbergstromlaw.com);  
3. Ann C. Elworth, Esq. (Assistant Bar Counsel): [anne@nvbar.org](mailto:anne@nvbar.org);

10 DATED this 20<sup>th</sup> day of June, 2018.

11  
12 By: 

13 Tiffany Bradley, an employee of  
the State Bar of Nevada.



FILED

JUN 20 2018

Case Nos.: OBC17-1050

STATE BAR OF NEVADA  
BY: S. Dur.  
OFFICE OF BAR COUNSEL

STATE BAR OF NEVADA  
SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,

Complainant,

vs.

JEREMY T. BERGSTROM, ESQ.  
NV BAR No. 6904  
Respondent,

ORDER APPOINTING  
FORMAL HEARING PANEL

IT IS HEREBY ORDERED that the following members of the Southern Nevada Disciplinary Board have been designated as members of the formal hearing panel in the above-entitled action. The hearing will be convened on the 25<sup>th</sup> day of July, 2018 starting at 9:00 a.m. at the State Bar of Nevada, located at 3100 W. Charleston Blvd. Ste. 100, Las Vegas, NV 89102.

1. Dawn Lozano, Esq., Chair;
2. John Bragonje, Esq.
3. Randall Scott, Laymember

**Please note:**

The hearing will be off-site at Litigation Services (court reporter) located at 3770 Howard Hughes Parkway, Suite 300. LV NV 89169

DATED this 20<sup>th</sup> day of June, 2018.

STATE BAR OF NEVADA

By: \_\_\_\_\_

Luke Puschnig, Esq.  
Nevada Bar No. 3792  
Chair of Southern Nevada Disciplinary Board

1 CERTIFICATE OF SERVICE

2 The undersigned hereby certifies a true and correct copy of the foregoing **ORDER**  
3 **APPOINTING FORMAL HEARING PANEL** was deposited in the United States Mail at Las Vegas,  
4 Nevada, postage fully pre-paid thereon for first-class regular mail addressed to:

5 Jeremy T. Bergstrom, Esq.  
6 9555 S. Eastern Avenue, Ste. 200  
7 Las Vegas, NV 89123  
8 (SCR 79 address)

9 *and via email to:*

- 10 1. Dawn M. Lozano, Esq. (Panel Chair): [lozanolawlv@gmail.com](mailto:lozanolawlv@gmail.com);  
11 2. John E. Bragonje, Esq. (Panel Member): [jbragonje@lrrc.com](mailto:jbragonje@lrrc.com); [lhovath@lrrc.com](mailto:lhovath@lrrc.com);  
12 3. Randall Scott (Lay Member): [randallscott29@gmail.com](mailto:randallscott29@gmail.com);  
13 4. Respondent: [jbergstrom@jbergstromlaw.com](mailto:jbergstrom@jbergstromlaw.com); [info@jbergstromlaw.com](mailto:info@jbergstromlaw.com);  
14 5. Ann C. Elworth, Esq. (Assistant Bar Counsel): [anne@nvbar.org](mailto:anne@nvbar.org);

15 DATED this 20<sup>th</sup> day of June, 2018.

16 By: 

17 Tiffany Bradley, an employee of  
18 the State Bar of Nevada.  
19  
20  
21

Case No.: OBC17-1050



FILED

JUN 25 2018

STATE BAR OF NEVADA  
BY: S. Dur  
OFFICE OF BAR COUNSEL

STATE BAR OF NEVADA  
SOUTHERN NEVADA DISCIPLINARY BOARD

STATE BAR OF NEVADA,

Complainant,

vs.

JEREMY T. BERGSTROM, ESQ.,

Nevada Bar No. 6904,

Respondent.

STATE BAR'S FINAL DISCLOSURE  
OF EVIDENCE AND WITNESSES FOR  
FORMAL HEARING

TO: Jeremy T. Bergstrom, Esq.  
9555 S. Eastern Avenue, Ste. 200  
Las Vegas, NV 89123

PLEASE TAKE NOTICE that the following is an initial list of witnesses and initial summary of evidence which may be offered against Respondent at the time of the Formal Hearing, in the above-entitled complaint.

**A. Documentary Evidence**

Attached hereto is the State Bar's Exhibit List of proposed date-stamped exhibits being submitted to Respondent on disk via U.S. mail.

1. Any and all documentation contained in the State Bar of Nevada's files including but not limited to, correspondence, emails, memorandums, text messages, notes, payments, invoices, bank records, receipts, billing entries and pleadings regarding grievance file number OBC17-1050.

2. Any and all documentation contained in *Neilson Lee vs. Ng, et al.*, Case No. A-16-734246-F.

3. Any and all documentation contained in records of the State Bar of Nevada regarding Respondent's licensure, compliance with reporting requirements, and disciplinary history.

The State Bar reserves the right to supplement this list as necessary.

Exhibit#	Document	Bates Stamped
1.	Formal Hearing Packet	will be produced prior to hearing pursuant to DRP 32
2.	Affidavit of Prior Discipline	will be produced at the time of hearing
3.	State Bar of Nevada's Grievance File	SBN Exhibit 3 001-014
4.	State of Oregon - General Judgment, Case No. 15CV33982	SBN Exhibit 4 001-002
5.	Nevada District Court -Application of Foreign Judgment, Case No. A-16-734246-F	SBN Exhibit 5 001-010
6.	Clark County Assessor Records for 2059 Raspberry Hill Road	SBN Exhibit 6 001-006
7.	Clark County Assessor Records for 1711 Elaine Drive	SBN Exhibit 7 001-006
8.	Refund check in the amount of \$4,707.01	SBN Exhibit 8 001

The State Bar incorporates by reference all documents identified by Respondent in this matter.

**B. Witnesses**

1. Respondent will be called and would be expected to testify regarding his conduct and communications surrounding the events related to, and any and all documents pertinent to, each of the charged Rules of Professional Conduct, including but not limited to facts pertaining to the breach of his professional responsibilities as an attorney, his mental state pursuant to ABA Standards, the harm resulting from his conduct, and any aggravating and mitigating factors pursuant to Supreme Court Rule 102.5.

2. David A. Jacobs, Esq., may be called and would be expected to testify regarding the facts and circumstances surrounding the grievance.



3. Neilson Lee may be called and would be expected to testify regarding the facts and circumstances surrounding the grievance.

4. Benjamin Wang, Esq., may be called and would be expected to testify regarding the facts and circumstances surrounding the grievance.

5. Ivan Baric may be called and would be expected to testify regarding the facts and circumstances surrounding the grievance.

6. State Bar Investigator, Suzanne Farrell, is anticipated to testify concerning her interactions with the Grievant, attempts to secure cooperation from Respondent, her investigation of the charged Grievance, Office of Bar Counsel investigation procedures, her investigation, review of documents acquired and maintained by the Office of Bar Counsel pertinent to any and all relevant facts, issues, and documentation.

7. A representative of the State Bar of Nevada Office of Bar Counsel is expected to testify as Custodian of Records and provide testimony regarding Respondent's license and discipline history.

The State Bar reserves the right to supplement this witness list as necessary.

DATED this 25 day of June, 2018.

STATE BAR OF NEVADA

By: Ann C. Elworth  
Ann C. Elworth, Assistant Bar Counsel  
Nevada Bar No. 6338  
3100 W. Charleston Blvd. Ste. 100  
Las Vegas, Nevada 89102

1 CERTIFICATE OF SERVICE

2 The undersigned hereby certifies a true and correct copy of the foregoing STATE BAR'S  
3 FINAL DISCLOSURE OF EVIDENCE AND WITNESSES FOR FORMAL HEARING was  
4 deposited in the United States Mail at Las Vegas, Nevada, postage fully pre-paid thereon for first-class  
5 regular mail addressed to:

6 Jeremy T. Bergstrom, Esq.  
9555 S. Eastern Avenue, Ste. 200  
Las Vegas, NV 89123  
(SCR 79 address)

7 and via email to:

- 8 1. Dawn M. Lozano, Esq. (Panel Chair): [lozanolawlv@gmail.com](mailto:lozanolawlv@gmail.com);  
9 2. Respondent: [jbergstrom@jbergstromlaw.com](mailto:jbergstrom@jbergstromlaw.com); [info@jbergstromlaw.com](mailto:info@jbergstromlaw.com);  
10 3. Ann C. Elworth, Esq. (Assistant Bar Counsel): [anne@nvbar.org](mailto:anne@nvbar.org);

11 DATED this 25<sup>th</sup> day of June, 2018.

12  
13 By: 

Tiffany Bradley, an employee of  
the State Bar of Nevada.

**AFFIDAVIT OF TIFFANY BRADLEY**  
**CUSTODIAN OF RECORDS**

STATE OF NEVADA       )  
                                      ) §:  
COUNTY OF CLARK       )

TIFFANY BRADLEY, under penalty of perjury, being first duly sworn, deposes and says as follows:

That Affiant is employed as a Hearing Paralegal for the Office of Bar Counsel of the State Bar of Nevada and in such capacity is the custodian of records for the State Bar of Nevada;

That Affiant has reviewed the State Bar of Nevada membership records regarding Respondent Jeremy T. Bergstrom, Nevada Bar number 6904, and has verified that he was first licensed to practice law in the State of Nevada on October 12, 1999.

That Affiant has reviewed the State Bar of Nevada membership records and confirmed that Respondent Jeremy T. Bergstrom, Nevada Bar number 6904 is currently active.

That Affiant has reviewed the State Bar of Nevada discipline records regarding Respondent and has verified that he has no prior discipline.

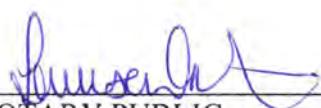
FURTHER YOUR AFFIANT SAYETH NAUGHT.

Dated this 12<sup>th</sup> day of July, 2018.



\_\_\_\_\_  
Tiffany Bradley, Hearing Paralegal  
Office of Bar Counsel

SUBSCRIBED AND SWORN to before me  
this 12<sup>th</sup> day of July, 2018.



\_\_\_\_\_  
NOTARY PUBLIC  
State of Nevada  
County of Clark



**SBN Exhibit 2**

## Suzanne Farrell

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**From:** nevadabarforms@gmail.com  
**Sent:** Monday, August 07, 2017 11:29 AM  
**To:** complaints; nevadabarforms@gmail.com  
**Subject:** New submission from File a Complaint Online

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

### First, Middle and Last Name

David A. Jacobs

### Your Address

777 High Street, Suite 300  
Eugene, OR 97401  
[Map It](#)

### Your Email

[djacobs@luvaascobb.com](mailto:djacobs@luvaascobb.com)

### Your Primary Telephone Number

(541) 484-9292

### Attorney Information

#### Attorney Name

Jeremy T. Bergstrom

#### Law Firm Name

Bergstrom Law, Ltd.

#### Attorney Address

9555 S. Eastern Avenue, Suite 200  
Las Vegas, NV 89123  
[Map It](#)

### Previous Contact with the State Bar of Nevada

Have you previously contacted the State Bar of Nevada regarding this matter?

No

### Hiring the Attorney

Did you hire/retain the attorney about whom you are complaining?

Yes

When did the representation begin?

March 2016

What was the fee arrangement?

20% contingency, plus \$5,000 flat fee and out of pocket costs

How much have you paid the lawyer to date?

\$5,000





**Brief description of the nature of the case the attorney was engaged to handle (i.e. personal injury, criminal, malpractice)**

I am an attorney in Oregon. Bergstrom was hired to domesticate an Oregon judgment and pursue collection against the judgment debtor.

**Names and contact information for other persons who can provide additional information concerning your complaint**

None.

**Litigation**

**Case Name**

Neilson Lee v. Wah Onn Ng aka Kris Wah Onn Ng, Ng Wah Onn

**Case Number**

A-16-734246-F

**Name of court or agency**

Clark County, Nevada District Court

**Explanation of Grievance**

**Complaint Details**

Bergstrom was retained by my client Neilson Lee to pursue collection of an Oregon judgment debtor believed to be located in Las Vegas, and known have real property in Las Vegas. The written fee agreement required a \$5,000 fixed fee, with a 20% contingency on any collected funds. Bergstrom received a check for \$5,000. Bergstrom domesticated the foreign judgment and represented that he would proceed to levy on the real property after a 30-day automatic stay expired on May 4, 2016. He also represented that he would take steps to attempt to locate money that the judgment debtor may have held in local casinos. I provided Bergstrom with all the information that my firm had developed on the judgment debtor, and authorized him to incur additional costs when requested.

As you will see from the complete trail of correspondence documenting our communications and my requests for information (that will be sent by regular mail), Bergstrom appears to have made material misrepresentations with regard to his collection efforts. In particular, Bergstrom represented that he had obtained writs of execution on 2 of the subject properties. But I have been unable to independently verify; and no substantiating documentation was provided by Bergstrom despite repeated requests. In addition, Bergstrom failed to keep me informed of his activities or to respond to my repeated inquiries. I have not heard a word from him since January 17, 2017.

It appears that Bergstrom took \$5,000 from my client and did virtually nothing to pursue the collection, except to domesticate the Oregon judgment. The information Bergstrom obtained and reported about the judgment debtor's property was basically the same that I had provided to him at the outset.

Based on Bergstrom's complete failure to meet his obligations to my client, and his apparent misrepresentations to me, and refusal to respond to my repeated inquiries, it would appear the following Nevada Rules of Professional Conduct may be implicated by this complaint: 151, 153, 154, 155, 171, 181, 185, 186, 187, 195 and 203.

**Explain what measures you have taken to resolve this matter directly with the attorney**

As you will see from the correspondence that will be sent by mail to supplement this complaint, I repeatedly called and emailed Bergstrom in an effort to obtain information from him. In addition, I contacted his firm at its general contact number and email, and contacted a paralegal whose name was on some research Bergstrom had provided early on, and I attempted to email other lawyers at the firm. I was never provided the information I needed to confirm what, if anything, was being done to fulfill Bergstrom's obligations to our client.

As an attorney in Oregon with more than 20 years experience who regularly defends lawyers for the Oregon State Bar's Professional Liability Fund, it is with great regret that I am forced to file this complaint. I have never done so before. I wanted to give Bergstrom the benefit of the doubt, and did give him multiple opportunities to explain his inattention and apparent misstatements. But when no such explanations were provided, or his representations could not be independently confirmed, and repeated efforts to obtain information from Bergstrom and his staff were met with silence or false assurances, I determined I had no choice. I take my obligations to the bar seriously and I expect others to do so as well. I hope that Bergstrom is able to show you that somehow this is all a legitimate misunderstanding, and that he has in fact met his obligations to our client and the bar. But if so, it is very troubling that he did not make the effort to convince me of that.



**BERGSTROM LAW, LTD.  
ATTORNEY-CLIENT LEGAL SERVICES FEE AGREEMENT**

BERGSTROM LAW, LTD.  
9555 S. Eastern Ave., Ste. 200  
Las Vegas, NV 89123  
Phone: (702) 333-0007  
Fax: (702) 333-1524  
info@jbergstromlaw.com

Date: March 22, 2017

**Re: NEILSON LEE v. WAH ONN NG aka KRIS WAI ONN NG & NG WAH ONN  
CASE NO: 15CV33982, CIRCUIT COURT OF OREGON FOR LANE COUNTY  
TO BE REGISTERED & DOMESTICATED IN NEVADA**

BERGSTROM LAW, LTD. ("Attorneys") and NEILSON LEE, ("Client") hereby agree that Attorney will provide legal services to Client on the term set forth below.

1. **CONDITIONS.** This Agreement will not take effect, and Attorney will have no obligation to provide legal services, until Clients return a signed copy of this Agreement and pay the initial deposit called for under Paragraph 4, if applicable.
2. **SCOPE OF SERVICES.** Client hires Attorney to provide legal services in the above-referenced matter **NAMELY:** to register and domesticate an Oregon Judgment entered in favor of Client in the above captioned matter in the State of Nevada and attempt to collect upon Client's judgment that with principal and interest now totals \$543,699.74. Attorney will provide those legal services reasonably required to represent Client. Attorney will take reasonable steps to keep Client informed of progress and to respond to Clients' inquiries. If a court action is filed, Attorney will represent Clients through all necessary Nevada District Court proceedings. This Agreement does not cover representation on appeal or in the event Judgment Debtor files for bankruptcy relief under the United States Bankruptcy Code. Separate arrangements must be agreed to for those services. Services in any matter not described above will require a separate written agreement.
3. **CLIENTS' DUTIES.** Client agree to keep Attorney informed of any information or developments which may come to Clients' attention, to abide by this Agreement, to pay Attorney's bills on time, and to keep Attorney advised of Clients' address, telephone number and whereabouts. Client will assist Attorney in providing necessary information and documents and will appear when necessary at legal proceedings.

4. **LEGAL FEES AND BILLING PRACTICES.** Client agrees to pay Attorney upon execution of this Agreement a \$5,000.00 non-contingent fee which is considered earned upon receipt and filing of the registration of foreign judgment action in Nevada. Thereafter, Attorney shall be entitled to twenty per cent (20%) of any and all amounts recovered from the Judgment Debtor either after demand upon Debtor, suit or other legal proceeding. The contingency fee shall be in addition to the \$5,000.00 non-contingent fee and will not be applied towards such fee.
5. **COSTS AND OTHER CHARGES.** Costs and other charges to be paid by Clients are set forth as follows:
- a. Attorney will incur various costs and expenses in performing legal services under this Agreement. Client agrees to pay for all costs, disbursements and expenses in addition to the fees as agreed in Paragraph 4 above. The costs and expenses commonly include filing fees, services of process charges, court and deposition reporters' fees, jury fees, notary fees, deposition costs, long distance telephone charges, messenger and other delivery fees, postage, overnight mail charges, photocopying and other reproduction costs, travel costs including parking, mileage, transportation, meals and hotel costs, investigation expenses, consultants' fees, expert witness, professional, mediator, arbitrator and/or special master fees and other similar items. Except for the items listed below, all costs and expenses will be charged at Attorney's cost.  
On line record searches: \$4.50 per minute  
Federal case searches: \$7.50 per minute
  - b. Out of town travel. Clients agree to pay transportation, meals, lodging and all other costs of any necessary out-of-town travel by Attorney's personnel.
  - c. Experts, Consultants and Investigators. To aid in the preparation or presentation of Clients' case, it may become necessary to hire expert witnesses, consultants or investigators. Client agrees to pay such fees and charges. Attorney will select any expert witnesses, consultants or investigators to be hired, and Client will be informed of persons chosen and their charges.
  - d. Attorney will provide Client with prior notice and obtain approval by email before incurring any cost or other charge subject to this section that is anticipated to exceed \$350.
6. **BILLING STATEMENTS.** Attorney will send Client statements for fees and costs incurred on a monthly basis. Each statement will be payable in full within 30 days of its mailing date. Any fees not paid within 60 days will accrue interest at 12 percent per annum. Client may request a statement at intervals of no less than 30 days. If Client so request, Attorney will provide one within 10 days. The statements shall include the amount, rate, basis of calculation or other method of determination of the fees and costs, which costs will clearly be identified by item and amount.

7. **LIEN.** Client hereby grants Attorney a lien on any and all claims or causes of action that are the subject of the representation under this Agreement. The lien will be for any sums owing to Attorney at the conclusion of services performed. The lien will attach to any recovery Clients may obtain, whether by arbitration award, judgment, settlement or otherwise. The effect of such a lien is that Attorney may be able to compel payment of fees and costs from any such funds recovered on behalf of Clients even if Attorney has been discharged before the end of the case.

Because a lien may affect Clients' property rights, Client may seek the advice of an independent lawyer of Clients' choice before agreeing to such a lien. By initialing this paragraph, Client represent and agree that Client has had a reasonable opportunity to consult such an independent lawyer and – whether or not Client has chosen to consult such an independent lawyer – Clients agree that Attorney will have a lien as specified above.

8. **COURT-AWARDED FEES/COSTS.** If an award of fees and/or costs to be paid by third party is obtained on Clients' behalf in this action, such award shall belong to Client. Client understands that the court's order awarding fees and/or costs will not affect Clients' obligation to pay Attorney fees and/or costs under this Contract. Client agrees that notwithstanding a court award of fees or costs in Clients' case, Client will remain responsible for payment in full of attorney fees and costs in accordance with this Contract. However, any payment of court-awarded fees and/or costs amount by a third party will be credited against the amount of fees and/or costs owed by Client under this Contract.
9. **DISCHARGE AND WITHDRAWAL.** Client may discharge Attorney at any time. Attorney may withdraw with Clients' consent or for good cause. Good cause includes Clients' breach of this Agreement, refusal to cooperate or to follow Attorney's advice on a material matter or any fact or circumstance that would render Attorney's continuing representation unlawful or unethical. When Attorney's services conclude, all unpaid charges will immediately become due and payable. After services conclude, Attorney will, upon Clients' request, deliver Clients' file and property in Attorney's possession unless subject to the lien provided in Paragraph 8 above, whether or not Clients have paid for all services.

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Page 3 of 5

10. **CLIENTS' FILE.** If Client does not request return of Clients' file upon the conclusion of Clients' matter, Attorney will retain the file for a period of five (5) years, after which Attorney may have Clients' file destroyed. If Client desires to have Clients' file maintained beyond five (5) years after the conclusion of Clients' matter, separate arrangements with Attorney must be made.

In the event Client desires to transfer possession of Clients' file to Client or a third party, Clients shall make the request in writing and Client or the third party shall acknowledge receipt of the file in writing. Attorney is authorized to retain a copy of Clients' file for Attorney's use at Clients' expense. Clients' file includes Clients' papers and property.

11. **DISCLAIMER OF GUARANTEE AND ESTIMATES.** Nothing in this Agreement and nothing in Attorney's statements to Clients will be construed as a promise or guarantee about the outcome of the matter. Attorney makes no such promises or guarantees. Attorney's comments about the outcome of the matter are expressions of opinion only. Any estimate of fees given by Attorney shall not be a guarantee. Actual fees may vary from estimates given.
12. **ENTIRE AGREEMENT.** This Agreement contains the entire agreement of the parties. No other agreement, statement, or promise made on or before the effective date of this Agreement will be binding on the parties.
13. **SEVERABILITY IN EVENT OF PARTIAL INVALIDITY.** If any provision of this Agreement is held in whole or in part to be unenforceable for any reason, the remainder of that provision and of the entire Agreement will be severable and remain in effect.
14. **MODIFICATION BY SUBSEQUENT AGREEMENT.** This Agreement may be modified by subsequent agreement of the parties only by an instrument in writing signed by both of them, or an oral agreement only to the extent that the parties carry it out.
15. **EFFECTIVE DATE.** This Agreement will govern all legal services performed by Attorney on behalf of Clients commencing with the date Attorney first performed services. The date at the beginning of this Agreement is for reference only. Even if this Agreement does not take effect, Clients will be obligated to pay Attorney the reasonable value of any services Attorney may have performed for Clients.

16. **CHOICE OF LAW.** This agreement shall be governed by and construed under the law of the State of Nevada.

**THE PARTIES HAVE READ AND UNDERSTOOD THE FOREGOING TERMS AND AGREE TO THEM AS OF THE DATE ATTORNEY FIRST PROVIDED SERVICES. IF MORE THAN ONE CLIENT SIGNS BELOW, EACH AGREES TO BE LIABLE, JOINTLY AND SEVERALLY, FOR ALL OBLICATIONS UNDER THIS AGREEMENT. CLIENTS SHALL RECEIVE A FULLY EXECUTED DUPLICATE OF THIS AGREEMENT.**


DATED: \_\_\_\_\_

BERGSTROM LAW, LTD.

By: \_\_\_\_\_  
Jeremy T. Bergstrom, Esq., Managing Attorney

DATED: March 24, 2016

CLIENT'S SIGNATURE

By:   
BENJAMIN WANG, as Attorney in Fact for  
NEILSON LEE, an individual

Address: \_\_\_\_\_

\_\_\_\_\_  
(TITLE)

Telephone: \_\_\_\_\_





*Benjamin Beijing Wang, P.C.*  
Attorney at Law

[bwang@bwanglaw.com](mailto:bwang@bwanglaw.com)  
[www.bwanglaw.com](http://www.bwanglaw.com)

March 28, 2016

BERGSTROM LAW, LTD.  
9555 S. Eastern Ave., Ste. 200  
Las Vegas, NV 89123

Re: Neilson Lee v. Wah Onn Ng – Legal Services Fee Agreement

Dear Mr. Bergstrom:

Enclosed please find the signed Attorney-Client Legal Services Fee Agreement and a check in the amount of \$5,000.

Very truly yours,



BENJAMIN BEIJING WANG

cc: David Jacobs

NEILSON J LEE  
PO BOX 50925  
EUGENE, OR 97405-0990

7145  
DATE 3/24/16 10/2015

PAY TO THE ORDER OF Bergstrom Law, LTD. \$ 5,000<sup>-</sup>

Five thousand and no/100 DOLLARS

CHASE  
JPMorgan Chase Bank, N.A.  
www.Chase.com

MEMO Neilson Lee v. Wash. On Ng Beip. (Ver 8) MP

⑆325070760⑆ 472654081⑆7145

From: David Jacobs [<mailto:djacobs@luvaascobb.com>]

Sent: Monday, April 18, 2016 11:27 AM

To: Jeremy Bergstrom <[jbergstrom@jbergstromlaw.com](mailto:jbergstrom@jbergstromlaw.com)>

Cc: Brandie Davies <[bdavies@luvaascobb.com](mailto:bdavies@luvaascobb.com)>; Benjamin Wang <[bwang@bwanglaw.com](mailto:bwang@bwanglaw.com)>

Subject: Lee/Ng collection

Hi Jeremy. Could you please give me a quick status update on this matter?

Thanks.

**LUVAAS / COBB**

David A. Jacobs

777 High Street, Suite 300

Eugene, OR 97401

Phone: (541) 484-9292

FAX: (541) 343-1206

[www.luvaascobb.com](http://www.luvaascobb.com)

## Brandie Davies

---

**From:** Benjamin Wang <[bwang@bwanglaw.com](mailto:bwang@bwanglaw.com)>  
**Sent:** Monday, April 18, 2016 1:28 PM  
**To:** David Jacobs; Jeremy Bergstrom  
**Cc:** Brandie Davies  
**Subject:** RE: Lee/Ng collection

Hi Jeremy and David,

Thank you for your update. In Neilson's email to me over the weekend, he mentioned that the debtor Kris checked in at the Aria and Golden nugget in Vegas in early April or late March. These two hotels may also serve as a starting point to work with your collection strategy. Apparently, the Singapore police are also investigating the debtor, and I have asked our client to share with us information he may obtain from the investigation.

Best regards,

Benjamin Wang  
Attorney at Law  
Benjamin Beijing Wang, PC  
243 West 10<sup>th</sup> Ave  
Eugene, OR 97401  
Phone: (541)484-1811  
Fax: (541)431-3470  
[www.bwanglaw.com](http://www.bwanglaw.com)

This email is intended only for the person to whom it is addressed. If you are not the intended recipient or authorized agent, then please accept this notice that dissemination, distribution or copying of this transmission is prohibited. If this transmission is received in error, please contact this office at once and please destroy the original email transmission and any copy thereof.

---

**From:** David Jacobs [<mailto:djacobs@luvaascobb.com>]  
**Sent:** Monday, April 18, 2016 1:08 PM  
**To:** Jeremy Bergstrom  
**Cc:** Brandie Davies; Benjamin Wang  
**Subject:** RE: Lee/Ng collection

Thanks for the update. As I mentioned in my earlier email, the only person I know who has some information on the debtor's Las Vegas activities is Ivan Baric, [www.BaricRealEstate.com](http://www.BaricRealEstate.com), 702 232 0233. He'd probably be a good place to start.

**From:** Jeremy Bergstrom [<mailto:jbergstrom@jbergstromlaw.com>]  
**Sent:** Monday, April 18, 2016 12:23 PM  
**To:** David Jacobs <[djacobs@luvaascobb.com](mailto:djacobs@luvaascobb.com)>  
**Cc:** Brandie Davies <[bdavies@luvaascobb.com](mailto:bdavies@luvaascobb.com)>; 'Benjamin Wang' <[bwang@bwanglaw.com](mailto:bwang@bwanglaw.com)>  
**Subject:** RE: Lee/Ng collection

Hi David,

Attached is a copy of the judgment that was domesticated in Nevada on 3/30/16. There is a 30-day stay following the domestication that temporarily enjoins judicial post-judgment collection measures. We are now in that stay period. The stay expires on 5/4/16 (taking into consideration mailing time) and from that point forward, we can levy against any non-exempt asset we can find.

As far as a collection strategy, it is my understanding the debtor is high-limit, high-stakes gambler. Using casino terms, he would be labeled a whale. Whales typically find one casino they elect to call home and they play almost exclusively there. They do this to maximize their comp value through use of a dedicated casino host who will work with only a handful of players at a time, all whales. The host will basically do whatever the whale asks short of committing a major felony. When whales arrive at a casino to gamble, they do not want to spend an hour acquiring \$1,000,000.00 in casino chips on a marker each and every time they gamble. Regardless who the person is, that process is time consuming and it cannot be circumvented as extensive regulation governs those transactions and significant screening needs to occur, among other things. To avoid having to deal with the marker headache every time they gamble, whales will almost always acquire a lock-box at their casino of choice. When a whale finishes playing for the day, assuming he didn't get felted and has chips remaining in his possession, rather than cashing the chips out and satisfying the marker, the whales will simply have casino staff lock those chips in his lock-box where they will stay until the whale plays again. When he arrives the next time to play, he simply sends the casino staff to bring him the chips from his lock-box and he's gambling within a few minutes. When a scenario like this exists the casino will require the whale to satisfy the marker through other funds so that marker is not carried forward still owing.

In case you were wondering why I just spent 10 minutes writing about whales and local gambling preferences, there is a reason and that reason is related to one of the collection strategies for this judgment. If this debtor really is a whale, there is a very high probability he utilizes a lock-box at his casino of choice to store large denominations of casino chips. These casino chips are not exempt from execution. If we can determine his casino of choice, we will send a writ of execution to that casino asking it to levy against any and all tangible goods, money, currency, chips, etc., in its possession belonging to or being held for the benefit of the debtor. We may get very fortunate very quickly.

Is his casino of choice known to anyone? If not, we will start the investigation there to obtain that information and then proceed with the writ. If this strategy proves to be unsuccessful, we can huddle up and determine option B.

**Jeremy T. Bergstrom, Esq.**  
**MANAGING ATTORNEY**

 **BERGSTROM LAW, LTD.**  
ATTORNEYS AT LAW

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A portion of this Firm's practice may be considered debt collection and any information obtained may be used for that purpose.



**Brandie Davies**

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**From:** David Jacobs  
**Sent:** Wednesday, May 11, 2016 10:30 AM  
**To:** Jeremy Bergstrom  
**Cc:** Brandie Davies; 'Benjamin Wang'  
**Subject:** RE: Lee v. Ng (Oregon lawsuit, LV collection)

No problem. I figured something must be up. A nasty bug is miserable. I hope you're feeling better. I'll let Ivan know you'll be giving him a call. Thanks.

**From:** Jeremy Bergstrom [mailto:jbergstrom@jbergstromlaw.com]  
**Sent:** Wednesday, May 11, 2016 9:49 AM  
**To:** David Jacobs <djacobs@luvaascobb.com>  
**Cc:** Brandie Davies <bdavies@luvaascobb.com>  
**Subject:** RE: Lee v. Ng (Oregon lawsuit, LV collection)

Hi David,

I apologize for being MIA lately. I've been laid up in bed for the better part of two weeks with a flu bug that would not go away. I've finally managed to get past it and now I'm playing catch up in the office.

With regard to the e-mail below, yes, I will call him. Please let him know to expect a call.

Apologies again for not responding during the time I was out of commission.

**Jeremy T. Bergstrom, Esq.**  
**MANAGING ATTORNEY**



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**From:** David Jacobs [mailto:djacobs@luvaascobb.com]  
**Sent:** Monday, May 02, 2016 1:41 PM  
**To:** Jeremy Bergstrom <jbergstrom@jbergstromlaw.com>