

IN THE SUPREME COURT OF THE STATE OF NEVADA

ROBERT G. REYNOLDS, an
Individual, and DIAMANTI FINE
JEWELERS, LLC, a Nevada Limited
Liability Company,

Appellants,

vs.

RAFFI TUFENKJIAN, an individual,
and LUXURY HOLDINGS LV, LLC, a
Nevada Limited Liability Company,
DOES 1-10, and ROE
CORPORATIONS 1-10, inclusive,

Respondents.

CASE NO. 78187
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Elizabeth A. Brown
Clerk of Supreme Court

APPEAL

From the Eighth Judicial District Court, Department XIII
The Honorable Mark R. Denton, District Judge
District Court Case No. A-17-753532-C

APPELLANTS' AMENDED APPENDIX VOLUME IV

BRADLEY M. MARX, ESQ.
Nevada Bar No. 12999
MARX LAW FIRM PLLC
601 S. Rancho Dr. Ste. B14
Las Vegas, NV 89106
Telephone: (702) 900-2541

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ORDER

IT IS HEREBY ORDERED, ADJUDGED AND DECREED

1. Defendants Raffi Tufenkjian and Luxury Holdings LV, LLC's Motion for Summary Judgment is hereby GRANTED;

2. As such, summary judgment is hereby ENTERED in favor of the Defendants and against Plaintiffs' claims alleged against the Defendants.

IT IS SO ORDERED this 13th day of November, 2018.
DISTRICT COURT JUDGE

Respectfully Submitted By:

MARQUIS AURBACH COFFING

By: 

Terry A. Moore, Esq.
Nevada Bar No. 7831
Christian T. Balducci, Esq.
Nevada Bar No. 12688
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Defendants

Approved as to form, only.

CHASEY LAW OFFICES

By: Refused

Peter L. Chasey, Esq.
Nevada Bar No. 7650
3295 N. Fort Apache Road, Ste. 110
Las Vegas, Nevada 89129
Attorneys for Plaintiffs

EXHIBIT 3

Attorney for Plaintiffs
ROBERT G. REYNOLDS and
DIAMANTI FINE JEWELERS, LLC

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MEMORANDUM OF POINTS AND AUTHORITIES

I.

INTRODUCTION

Robert Reynolds ("Reynolds") was born on April 19, 1933. 85 years later, on his birthday, Reynolds gave his deposition in his case against Raffi Tufenkjian ("Raffi") arising from the sale and purchase of a jewelry store business.

The sale and purchase of the business was consummated through Raffi and Reynolds' respective 100% owned and managed Nevada Limited Liability Companies. The contracts contain disclaimers warning Reynolds to investigate and do his own due diligence. Raffi asserts that these disclaimers absolve him from any misconceptions held by Reynolds after Reynolds' due diligence. That is not so.

The Business Opportunity Summary (hereinafter "Business Summary") attracted Reynolds to the business, but during Reynolds' due diligence, Raffi referred Reynolds to the Business Summary and assured Reynolds that the financial statements contained therein were accurate. During due diligence, Reynolds relied on Raffi for information peculiarly within Raffi's knowledge. Reynolds trusted Raffi based on business experience in a different era (and in a different country).

Raffi represented that the jewelry store generated \$800,000 in revenue. It did not even come close. Raffi gave Reynolds a list of the customers who generated the business' revenue, but the list was 25% customers, 75% non-customers. Raffi sold Reynolds title to the business' FF&E¹, including \$75,000 of cabinets built into the walls, but Raffi never had title to those cabinets. Finally,

¹ Furniture, fixtures, and equipment.

1 Raffi agreed to sell Reynolds his inventory at cost, but then added 10% to all costs in an ill-conceived
2 effort to avoid bearing the cost of the commission Raffi owed to his business broker.

3
4 In the case before this Court, the following questions of fact remains unresolved:

- 5 • Did Reynolds reasonably rely on Raffi's misrepresentations of business revenue,
6 title to the FF&E, customers, and cost of inventory during due diligence?
- 7 • Is Reynolds entitled to the protection of NRS 41.1395, even though Reynolds' lost
8 his money through a transaction consummated through Reynolds' 100% owned
9 Limited Liability Company?

10 Here and now, this Court is not required to answer these questions based on the evidence
11 but must determine only whether Reynolds could prevail if the evidence is interpreted and construed
12 in Reynolds' favor. Because the answer is affirmative, Reynolds' 4 claims should proceed to trial.

13
14 **II.**

15 **STATEMENT OF DISPUTED AND UNDISPUTED FACTS**

16 **A. The Claims and the Misconduct on Which They Are Based**

17 The parties agree on that Reynolds' claims of intentional misrepresentation, negligent
18 misrepresentation, breach of contract, and elder abuse based on allegations that Raffi:

- 19 1. Misrepresented business revenue,
- 20 2. Misrepresented title to the FF&E,
- 21 3. Misrepresented the cost of inventory,
- 22 4. Misrepresented the customer list, and
- 23 5. Violated a 50-mile, 5 year non-compete agreement

24 **B. The Parties' Sophistication**

25 Before retiring in 1995, Reynolds worked as a construction project supervisor. Reynolds
26 also bought and sold a hotel and a theater in South Africa. He is also still invested in a shopping mall
27 in South Africa.
28

1 Raffi describes Reynolds as intimately familiar with the concept of due diligence, but
2 business practices are highly dependent on time and location. For instance, Reynolds described the
3 due diligence relating to his purchase of the hotel as "It was just understood that if there was
4 anything defective, they'd fix it, and there wasn't so we went on with it. It was a very professional
5 arrangement." See Reynolds Deposition, p.22, lines 8-11 (Exhibit A to Raffi's MSJ). Similarly,
6 Reynolds bought out his business partner in the theater without a written contract. See *id.*, p.25,
7 lines 3-14. Reynolds' concept of due diligence reasonably included asking Raffi to verify financial
8 figures for the business and trusting him to tell the truth.
9

10
11 Reynolds is not quite as sophisticated as Raffi describes. Reynolds understood that Nevada
12 law no longer allowed incorporations so "I went to the CPA and I told him that I was going to buy this
13 business, would he help me set up the companies I needed to be within all of the laws and all of the
14 tax codes and everything. And he recommended the statute of our company." See *id.*, p. 38, line 17
15 – p.39, line 8. Based on advice from his accountant, Reynolds formed Reyco, LLC and Diamanti Fine
16 Jewelers, LLC, both of which are involved in the operation of the business at issue. See *id.*
17
18

19 Raffi has been in the family jewelry business since 1983 when he started working for his
20 father and brother. See Raffi Deposition, p.7, lines 2-23 (Exhibit 1). Raffi has opened and operated
21 several businesses since coming to Las Vegas in 1999. See *id.*, p.10, line 25 – p.11, line 16 (Tresor,
22 jewelry store in Desert Passage shops), p.41, lines 3-11 (NLT Properties, real estate investments), and
23 p.41, line 20 – p.42, line 10 (Scavolini, furniture store).
24

25 In April 2013, Raffi leased space for Diamanti Fine Jewelry in Tivoli Village. See Tivoli Lease
26 Agreement, April 16, 2013 (Exhibit 2). In October 2014, Raffi signed a lease with Galleria Mall for the
27 operation of a second Diamanti Fine Jewelry store. See Galleria License Agreement, October 6, 2014
28

1 (Exhibit 3). The day before closing on his sale of the business to Reynolds Raffi changed the tenant's
2 name on the lease from Luxury Holdings LV, LLC (Raffi's LLC) to Luxury Holdings CA, LLC (owned and
3 managed by Nazareth Tufenkjian, Raffi's brother); he also changed the name of the store from
4 "Diamanti Fine Jewelers" to "Oro Diamanti Fine Jewelers." See Merchant Vacating Notice, March 23,
5 2015 (Exhibit 4). Raffi's actions with respect to the entity operating his store in the Galleria mall
6 demonstrate not only his sophistication, but his breach of the agreement not to directly or indirectly
7 compete with Reynolds for 5 years within a 50-mile radius. See License Agreement (Exhibit 3) (signed
8 by Raffi); see Email, March 13, 2015 (Exhibit 5) (Raffi coordinating name change for the store); and
9 see Purchase and Sale Agreement, p.2, ¶ 6 (Exhibit C to Raffi's MSJ); see also Business Summary,
10 p.16, NON-COMPETE (Exhibit 7).

14 C. Raffi Markets the Business

15 In November 2014, Raffi listed the business for sale. See Listing Agreement, November 6,
16 2014 (Exhibit 6). Raffi's business brokers took the financial figures Raffi provided them and prepared
17 a Business Opportunity Summary. See Business Summary (Exhibit 7).

19 Some highlights from the Business Summary:

- 20 1. \$395,000 price included \$270,000 in hard assets and improvements. See *id.*, p.5.
- 21 2. Business had very high end customers. See *id.*, p.6.
- 22 3. Business had history of growing revenue and profitability. See *id.*
- 23 4. Business had excellent financial records. See *id.*
- 24 5. To operate the business, a buyer would need only basic management skills,
25 sales, skills, and be able to deal with employees and customers. See *id.*, p.14,
26 BUYER QUALIFICATIONS.
- 27 6. No inventory included but could be purchased at cost. See *id.*, p.16, INVENTORY.
- 28

1 7. Seller will agree not to compete with buyer, directly or indirectly, for a period of
2 5 years within a 50-mile radius of the business. *See id.*, p.16, NON-COMPETE.

3 8. 2014 Adjusted Financial Statement:

- 4 • Annual Revenue \$800,000
5 • Cost of Goods Sold \$330,400
6 • Operating Expenses \$246,887
7 • Net Profit \$222,713 *See id.*, p.18.

8 9. Total investment would be recaptured in approximately 23 months. *See id.*, p.23
9 RETURN ON INVESTMENT.

10 Initially, Raffi told projected 2014 revenue of \$850,000 but this number was backed down
11 to \$800,000 before Raffi approved the Business Summary. *See* Email, November 10, 2014 (Exhibit 8)
12 (\$850K revenue projection will be updated when exact numbers are known); Email, November 19,
13 2014 (Exhibit 9) (backing projected revenue down to \$800K); *and* Email, November 20, 2014
14 Exhibit 10) (Business Summary is good to go). Obviously, in November 2014 when the Business
15 Summary was created, Raffi did not have full year revenue figures and so the 2014 revenue was
16 initially presented as a projection. *See* Raffi Deposition, p.63, lines 8-10 (Exhibit 1).

17 The Business Summary cautions potential buyers not to rely on the Seller's representations
18 without verification during due diligence. For example,
19
20

- 21 • During the due diligence process, it is the responsibility of the Buyer, with
22 the aid of an accountant and/or attorney, if necessary, to independently
23 verify all representations which have been made by the Seller,
24 particularly as they relate to the adjustments made to the profit and loss
25 statements. *See* Business Summary, p.4, 2nd ¶ (Exhibit 7).
26
27 • It is the responsibility of the Buyer to verify all representations and to
28 make a final purchase decision based on their own independent
 investigation. *See id.*, p.4, 4th ¶.

Reynolds does not deny his obligation to move forward based on his due diligence.

1 In January 2015, Reynolds saw an advertisement and obtained a copy of the Business
2 Summary for Diamanti Fine Jewelers. See Email, January 5, 2015 (Exhibit Q to Raffi's MSJ).

3
4 **D. Reynolds Agreed to Buy the Business**

5 After Reynolds reviewed the Business Summary, he made an offer, that offer was accepted
6 by Raffi, and a Purchase and Sale Agreement was entered on January 13, 2015. See Purchase and
7 Sale Agreement, January 13, 2015 (Exhibit C to Raffi's MSJ).

8
9 **E. Reynolds Conducted Due Diligence Investigation**

10 **1. Verification of Revenue**

11 During due diligence, Reynolds asked for, received, and reviewed numerous documents
12 without assistance from accountants or bookkeepers as he deemed necessary based his experience
13 and the circumstances. See Reynolds Deposition, p.109, lines 9-14.

14
15 Every time Reynolds had a question about the financials, Raffi's business broker would
16 defer to Raffi and Raffi confirmed the accuracy of the financial statement in the Business Summary.
17 See *id.*, p.107, line 17 – p.108, line 2 and *id.*, p.125, lines 1-10. Reynolds trusted Raffi to tell the truth
18 because Raffi was personable and easy to trust. See *id.*, p.41, lines 20-23. During Reynolds' due
19 diligence in January, February, and March 2015, Raffi repeatedly confirmed that the 2014 financial
20 statement in the Business Summary was factual and accurate. See *id.*, p.119, line 20 – p.120, line 9.
21 Raffi explained "I have a holding company and the companies I own put all of their numbers together,
22 and you wouldn't be able to make sense out of it" and further, "If you go to the business summary,
23 and all of those numbers are factual." See Reynolds Deposition, p.36, lines 16-25 (Exhibit A to Raffi's
24 MSJ). Raffi's explanation made sense, and the 2014 revenue projection seemed to be in line with
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1 the records reviewed, so Reynolds understood that Raffi's projection of \$800,00 in revenue for 2014
2 had been met by the end of the year and was now accurate and factual rather than a projection.

3
4 **2. Verification of Customer Base**

5 Before purchasing the business, Reynolds asked Raffi for a list of the customers who
6 generated the \$800,000 in revenue for 2014; in response, Raffi delivered Reynolds a list of the names
7 and contact information for 1466 unique customers of the business. See Customer List (Exhibit 11);
8 see also Raffi Deposition, p.73, line 16 – p.74, line 12. Reynolds was satisfied with the customer base
9 as represented by Raffi.
10

11 **3. Verification of Inventory Costs**

12
13 Raffi agreed to sell Reynolds his inventory at cost. See Business Summary., p.16, INVENTORY
14 (Exhibit 7). To that end, Raffi provided Reynolds with an inventory report including cost and other
15 information for all jewelry in Raffi's store. See Inventory Report, March 23, 2015 (Exhibit 12).
16 Reynolds, Reynolds' son, and Raffi went through all the inventory to confirm its existence, but
17 Reynolds did rely on Raffi's representations that the computer-generated report listing inventory
18 costs was accurate.
19

20 Reynolds' due diligence involved an investigation and review of certain business records
21 and computer reports – all received from Raffi – and reviewed by Reynolds based on his experience
22 and the circumstances. See Reynolds Deposition, p.109, lines 9-14 (Exhibit A to Raffi's MSJ).
23 Reynolds understood that Raffi was the only person with knowledge of the business' finances and
24 customer base, and so Reynolds trusted and relied on Raffi to provide accurate records and he
25 trusted and relied on Raffi when Raffi repeatedly confirmed that the \$800,000 in revenue projection
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1 in the Business Summary had been met by the end of 2014 so that the revenue number was accurate
2 and factual based on year-end results.

3
4 **F. The Business is Sold and Purchased**

5 By the end of March 2015, Reynolds was satisfied with his investigation, he had examined
6 business records, and he had Raffi's confirmation that the 2014 revenue projections were now
7 actual, factual, and accurate. Accordingly, Reynolds bought the business and inventory from Raffi
8 for a total investment or purchase price of \$529,253.44. See Bill of Sale (Business), March 24, 2015
9 (Exhibit 13) (incorporating the Purchase and Sale Agreement, attached as Exhibit C to Raffi's MSJ);
10 Bill of Sale (Inventory), March 23, 2015 (Exhibit 14); see also Allocation of Purchase Price, March 24,
11 2015 (Exhibit 15) (\$100,00 for FF&E, \$134,253.44 for inventory, and \$295,000 for goodwill).
12 Additionally, as a necessary component of the transaction, Reynolds assumed personal liability under
13 the guarantee of the Tivoli Village lease. See Assignment and Assumption of Lease, March 25, 2015
14 (Exhibit 16).
15

16
17 After closing, Raffi's business broker noted "[t]hat old man can't operate that business."
18 See Email, March 24, 2015 (Exhibit 17).
19

20 **G. The Truth**

21 **1. Customer Base Was Much Smaller Than Represented**

22 During Reynolds' due diligence, Raffi represented that the business had a base of 1466
23 unique customers. See Customer List (Exhibit 11); see Raffi Deposition, p.73, line 16 – p.74, line 12.
24 Shortly after assuming operation of the business, Reynolds hired an employee to call the customers
25 on the customer list; Reynolds discovered that more than half the people on the list had never even
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1 heard of Diamanti Fine Jewelers, much less purchased anything from the store. See Reynolds
2 Deposition, p.67, line 22 – p.68, line 2 (Exhibit A to Raffi's MSJ).

3
4 Raffi admits the 1466 names on the customer list includes non-customers. See Raffi
5 Deposition, p.72, line 14 – p.75, line 13 (Exhibit 1). Raffi knew the "customer" list did not represent
6 the customer base for the business, but nevertheless Raffi presented Reynolds with a customer list
7 comprised of more than 50% of people who had never been a customer of the business but who had
8 put their name into a raffle or attended an in-store event. See *id.*

10 **2. Raffi Added 10% to the Inventory Costs to Avoid a 10% Broker Commission**

11 Raffi agreed to sell the inventory at cost and Raffi knew he had to pay a 10% commission
12 on that sale to his business broker. See Email, March 23, 2015 (Exhibit 18). Raffi's business brokers
13 were concerned enough after speaking with Raffi about this matter that they reached out to
14 Reynolds seeking confirmation that he would not assist any effort by Raffi to bypass this obligation.
15 See Email, March 23, 2015 (Exhibit 19). Raffi admits adding 10% to the inventory cost entries to
16 offset the commission. See Raffi Deposition, p.85, lines 1-10 (Exhibit 1).

17
18
19 As Reynolds and his wife became more familiar with the store's computer system, they
20 discovered that the computer tracked the item cost history. Using this previously unknown feature,
21 Reynolds discovered that Raffi had added 10% to most of the inventory cost entries on February 22,
22 2015. See Item Cost History Report (Exhibit 20).

23
24 Raffi incorrectly asserts that Reynolds agreed to the 10% mark-up. See Raffi Deposition,
25 p.85, lines 20-23 *but see* Reynolds Declaration, p.1, ¶ 4 (Exhibit 21). Raffi also asserts that even
26 though Raffi **added** 10% to his inventory costs, and Reynolds paid that cost plus 10%, somehow
27 Reynolds acquired the inventory for *less* than Raffi's cost. See Raffi Declaration, p.3 ¶¶ 23-24
28

1 (Exhibit B to Raffi's MSJ). Raffi's mathematics do not compute. Raffi intentionally misrepresented
2 the inventory costs in a misguided effort to offset the commission owed to his broker.

3
4 **3. The Express Language in the Lease Confirms the Landlord Owns the FF&E**

5 The Bill of Sale for the Business contains a listing of the FF&E being sold by Raffi to
6 Reynolds. See Bill of Sale (Business), p.3, Inventory of FF&E (81 items) (Exhibit 14)). The first 9 items
7 of the FF&E include the built-in cabinets and counters and comprise 75% of the value of the FF&E.
8 See Reynolds Deposition, p.145, line 23 – p.146, line 3.

9
10 The built-in cabinets and other items in the first 9 FF&E items listed in the Bill of Sale,
11 however, were *leased* not owned, by Raffi. See Tivoli Village Lease, p.4, ¶ 1.3(b) (landlord delivers
12 premises with FF&E) and Exhibit I to the Lease (Exhibit 2); compare with Bill of Sale (Business), p.3,
13 Inventory of FF&E (Exhibit 14).

14
15 On discovery of this misrepresentation, Reynolds contacted Raffi's business broker and
16 requested further assurance of title from Raffi, or alternatively a refund of the money paid for these
17 FF&E items. See Email, October 31, 2016 (Exhibit 22). Raffi's broker asked Raffi to respond directly
18 to Reynolds. See *id.* Raffi did not respond. See Reynolds Declaration, p.1, ¶ 5 – p.2, ¶ 6 (Exhibit 21).

19
20 Fundamentally, Raffi knew he leased the FF&E items because they were identified in the
21 lease. He knew he was leasing them and he knew he did not own them. Raffi misrepresented
22 ownership of these FF&E items to sell that which he did not own.

23
24 **4. Raffi's Actual 2014 Business Revenue Is A Blurry Moving Target**

25 First and foremost, during his deposition, Reynolds indicated that he knew the business'
26 revenue numbers "were everywhere." See Reynolds Deposition, p.113, lines 1-14 (Exhibit A). Raffi
27 suggests Reynolds' observation was a red flag which precludes Reynolds from possibly being justified
28

1 in any further reliance on Raffi's revenue representations. The computer's monthly sales reports
2 conflicted with the monthly Nevada Sales and Use Tax Returns, but the discrepancies were
3 reasonably understood to be the result of a conflict between accounting and reporting methods. See
4 Reynolds Declaration, p.2, ¶ 7 (Exhibit 21). Nothing in Reynolds's due diligence raised any red flags;
5 he moved forward at closing still believing that the revenue as reflected in the records reviewed and
6 as presented in the Business Summary were factual and accurate. See *id.*
7

8
9 Second, it is axiomatic that, before the end of 2014 year-end revenue numbers were
10 unknown and unknowable. Raffi is not faulted for the year-end projections made in November and
11 based on revenue generated January through October 2014. After January 15, 2015, however, the
12 actual 2014 revenue was known. See Email, November 10, 2014 (Exhibit 8) (revenue will be updated
13 when exact numbers are known) and see December 2014 Sales and Use Tax Return, prepared on
14 January 15, 2015 (last page of Exhibit 23) and see Raffi Deposition, p.64, lines 2-12 (Exhibit 1)
15 (Business Summary never updated).
16

17
18 Instead of updating the revenue figures to reflect that the business had ***not met***
19 ***projections***, Raffi repeatedly assured Reynolds in January, February, and March 2015, that the
20 \$800,000 in revenue projected for 2014 was now factual and accurate. See Reynolds Deposition,
21 p.36, lines 16-25; p.107, line 17 – p.108, line 2; p.125, lines 1-10; and p.119, line 20 – p.120, line 9
22 (Exhibit A to Raffi's MSJ).
23

24 The actual 2014 revenue for the business is unknown. Raffi's 2014 financial statement in
25 the Business Summary represents \$800,000 in revenue. See Business Summary, p.18 (Exhibit 7). The
26 12 monthly Sales and Use Tax Returns for 2014 reflect sales revenue of \$747,597.72. See 2014
27 Monthly Sales and Use Tax Returns (collectively attached as Exhibit 23). Raffi's LLC filed its 2014 Tax
28

1 Return reporting \$748,801 in revenue for 2014. See Raffi Deposition, p.107, line 22 – p.108, line 4
2 (Exhibit 1). The several hundred sales receipts generated by the computer reflect revenue of
3 \$695,229.09 in 2014. (The sales receipts have been disclosed in discovery but are omitted as an
4 exhibit here for the sake of brevity. The documents will be brought to the hearing on this matter).
5

6 Reynolds excused Raffi's refusal to produce the 2014 tax return based on the explanation
7 that Raffi was operating other businesses through Luxury Holdings LV, LLC. See Reynolds Deposition,
8 p.36, lines 16-25 (Exhibit A to Raffi's MSJ). The tax return has been marked "confidential" and so will
9 not be attached, as an exhibit hereto but the tax return demonstrates that the only company
10 operated through Luxury Holdings LV, LLC was the Diamanti Fine Jewelers.
11

12 In addition to the store in Tivoli Village, Raffi operated a second store through Luxury
13 Holdings LV, LLC at the Galleria mall. See Galleria License (Exhibit 3). Raffi's second store paid a
14 portion of rent based on store revenue, so Raffi reported revenue to the landlord. Raffi's revenue
15 reports for the Galleria store location reveal \$89,363.37 in revenue from October to December 2014.
16 See Galleria Landlord Revenue Reports (collectively attached as Exhibit 22). Raffi asserts that the
17 \$800,000 in 2014 business revenue reflected in the Business Summary does not include the \$89,363
18 in revenue from Galleria store, but admits the revenue was reported to the IRS. See Raffi Deposition,
19 p.81, lines 1-19 and p.107, line 22 – p.108, line 4. (Exhibit 1).
20
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23 Raffi contradicts himself. Raffi reported \$800,00 in annual revenue for just the Tivoli
24 Village store location, but then reported \$748,801 in revenue to the IRS for the LLC that owned and
25 operated both store locations. Deducting the \$89,363 in revenue generated by the Galleria store,
26 however, means that the Tivoli Village store could only have generated \$659,438 in revenue in 2014.
27
28

1 The various sources of Raffi's revenue numbers existence of the second store in the
2 Galleria mall was unknown by Reynolds before the purchase of the business, so that even if Reynolds
3 had received the 2014 Tax Return, his reasonable due diligence would not have disclosed Raffi's
4 deception concerning a second significant source of revenue.
5

6 III.

7
8 SUMMARY JUDGMENT IS PROPER ONLY IN THE ABSENCE OF
9 UNRESOLVED GENUINE QUESTIONS OF MATERIAL FACT

10 Summary judgment is appropriate only when undisputed evidence demonstrates that the
11 moving party is entitled to judgment as a matter of law. See NRCP 56 (c). Where there are
12 unresolved genuine questions of material fact such that "a rational trier of fact could return a verdict
13 for the nonmoving party" then the case must proceed to trial. See *Wood v. Safeway, Inc.*, 121 Nev.
14 724, 731, 121 P.3d 1026, 1031 (2005) (citing *Matsushita Electric Industrial v. Zenith Radio Corp.*, 475
15 U.S. 574, 89 L.Ed. 2d 538, 106 S.Ct. 1348 (1986); see also *Posadas v. City of Reno*, 109 Nev. 448, 851
16 P.2d 438 (1993)).
17

18 Substantive law determines which facts are material on summary judgment. See *Wood*,
19 121 Nev. 724, 731, 121 P.3d 1026, 1031 (citing *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 91 L. Ed.
20 2d 202, 106 S. Ct. 2505 (1986)). In this case, genuine questions of fact exist concerning the
21 reasonableness of Reynolds reliance on Raffi's representations during due diligence and whether
22 Reynolds is entitled to the protection of Nevada's elder abuse statutes despite losing his money
23 through a transaction formally consummated by his 100% owned Nevada Limited Liability Company.
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IV.

**REYNOLDS JUSTIFIABLY RELIED ON RAFFI'S REPRESENTATIONS BECAUSE
HE HAD NO OTHER WAY TO VERIFY BUSINESS PERFORMANCE**

Reynolds acknowledges that express language in the Business Summary and the Offer of Purchase and Sale prevent him from relying on the representations made in the Business Summary without investigation and verification. See Business Summary, p.4, 2nd ¶ and 4th ¶ (Exhibit 7).

Reynolds did investigate and did conduct reasonable due diligence. Reynolds asked for, received, and reviewed the computer system reports and numerous other business records. When Raffi said the tax returns would not be helpful due to the operation of multiple businesses through Luxury Holdings LV, LLC, that explanation made sense especially when Raffi confirmed that the \$800,000 revenue projection had been met and was actual in 2015.

The 2014 revenue, inventory cost, customer base, and ownership of the FF&E were all investigated by Reynolds, and yet due to the nature of the information sought, Raffi was the only possible person who could verify the information sought about the business. "[W]hen matters are held to be peculiarly within defendant's knowledge, it is said plaintiff may rely without prosecuting an investigation, as he has no independent means for ascertaining the truth." See *Bank of Am. Corp. v. Braga Lemgruber*, 385 F. Supp. 2d 200, 230-31 (S.D.N.Y. 2005) (citing *Lazard Freres & Co. v. Protective Life Ins. Co.*, 108 F.3d 1531, 1542 (2d Cir. 1997) (quoting *Mallis v. Bankers Trust Co.*, 615 F.2d 68, 80 (2d Cir. 1980)), cert. denied, 522 U.S. 864, 118 S. Ct. 169, 139 L. Ed. 2d 1126 (1997) and *Todd v. Pearl Woods, Inc.*, 20 A.D.2d 911, 248 N.Y.S.2d 975 (N.Y. App. Div. 2d Dep't 1964), aff'd, 15 N.Y.2d 817, 205 N.E.2d 861, 257 N.Y.S.2d 937 (1965)). "[W]here, as here alleged, the facts were peculiarly within the knowledge of the defendants and were willfully misrepresented, the failure of the plaintiffs to ascertain the truth by inspecting the public records is not fatal to their action." See

1 *Todd v. Pearl Woods, Inc.*, 20 A.D.2d 911, 911, 248 N.Y.S.2d 975, 977. Similarly, Reynolds went to
2 the most reasonable source for the information sought. He reviewed records where reasonable, and
3 where those records were unavailable and the explanation for their omission was reasonable, he
4 relied on the person who would have provided the underlying data for those records. This question
5 whether Reynolds reasonably relied on Raffi's misrepresentations is a genuine question of material
6 fact and should not be answered before trial.
7

8
9 Reynolds is responsible for knowing what a reasonable investigation would have disclosed.
10 *See Blanchard v. Blanchard*, 108 Nev. 908, 911-912, 839 P.3d 1320 (1992). Reynolds' due diligence
11 investigation concerning the business was reasonable and failed to uncover significant discrepancies.
12 Reynolds relied on Raffi, but Raffi was certainly the best and only person to verify the revenue, costs,
13 customers, and title to the FF&E. Accordingly, Reynolds' due diligence reasonably and justifiably
14 caused him to believe that the business generated \$800,000 in revenue in 2014, the cost of the
15 business inventory was \$134,253.44, the business had 1466 unique customers, and the business
16 owned all of the listed the FF&E.
17

18
19 The disclaimers on which Raffi relies only protect Raffi if Reynolds' due diligence from
20 Reynolds' reliance in the absence of trickery.
21

22 The element of reliance has two distinct parts: the fact of reliance and
23 the right of reliance.

24 The right of reliance is tightly bound up with the duty of a
25 representee to be diligent in safeguarding his interests. The legal
26 obligation that a person exercise the common sense and judgment of
27 which he is possessed is a practical limitation on the actionability of
28 various representations. Where persons stand mentally on equal
footing, and in no fiduciary relation, the law will not protect one who
fails to exercise common sense and judgment....

1 However, this principle is not applied in cases where a party is by
2 trickery prevented from reading the document or **by trust and**
3 **confidence lulled into believing another's representation** as to its
 character or content.

4 *See Ruff v. Charter Behavioral Health Sys.*, 699 N.E.2d 1171, 1174-75 (Ind. Ct. App. 1998) (citing
5 *Plymale v. Upright*, 419 N.E.2d 756, 768 (Ind. Ct. App. 1981)) (emphasis added).
6

7 The disclaimers at issue in this case would protect Raffi if Reynolds had unreasonably relied
8 on the Business Summary, but Reynolds' relied on the representation of \$800,000 in revenue for
9 2014 **after** his review of numerous business records and the business computer, **after** Raffi explained
10 that the tax return would be unhelpful due to the operation of several companies through Luxury
11 Holdings LV, LLC, **and after** Raffi repeatedly confirmed that the \$800,000 in revenue projected for
12 2014 was accurate and factual after the end of 2014. Reynolds' trust in Raffi's truthfulness was
13 clearly misplaced but the genuine question of material fact remains unanswered: Was Reynolds
14 justified in relying on Raffi's representations concerning the revenue, costs, customers, and assets
15 owned by the business?
16
17

18 Evaluating the reasonableness of Reynolds' reliance on Raffi's representations also
19 requires consideration of the parties' varying levels of sophistication. Raffi asserts that sophisticated
20 business man simply failed to conduct proper due diligence in an arms-length transaction. Reynolds
21 disagrees with this assessment. Reynolds performed a reasonable investigation into the business
22 and moved forward with the purchase only after he was confident in his evaluation. Reynolds trusted
23 Raffi to truthfully represent the material information requested concerning the business, and Raffi
24 willfully mislead Reynolds as to revenue, costs, customers, and title to the FF&E – all of which was
25 information peculiarly and exclusively known by Raffi. Raffi exploited Reynolds' old-school approach
26 to business transactions.
27
28

1 Reynolds disclaimed reliance on Raffi's representations in the Business Summary without
2 verifying the representations through due diligence. Accordingly, Reynolds took reasonable steps to
3 verify the representations and moved forward with the sale. Reynolds certainly understood his due
4 diligence to have been reasonable under the circumstances, including his reliance on Raffi's
5 representations that the 2014 revenue projection were accurate and factual after the end of 2014.
6 The evidence bears this out and a rational jury could find that Reynolds reasonably and justifiably
7 relied on Raffi's representations about the business revenue, costs, customer, and title to the FF&E.
8

10 V.

11 **REYNOLDS IS ENTITLED TO PROTECTION OF NEVADA'S ELDER ABUSE STATUTES**

12 Nevada's elder abuse statutes are intended to protect older persons from exploitation
13 made possible due to advanced age. In doing so, the Nevada legislature provided that:

14 if an older person ... suffers a personal injury ... suffers a loss of money
15 or property caused by exploitation, the person who caused the injury...
16 or loss is liable to the older person ... for two times the actual damages
17 incurred by the older person ...

18 See NRS 41.1395(1).

19 "Exploitation" means any act taken by a person who has the trust and
20 confidence of an older person ... to:

21 (1) Obtain control, through deception,... over the money, assets or
22 property of the older person ... with the intention of permanently
23 depriving the older person ... of the ownership, use, benefit or
24 possession of that person's money, assets or property

25 See NRS 41.1395(4)(b).

26 "Older person" means a person who is 60 years of age or older.

27 See NRS 41.1395(4)(d).
28

1 Contrary to Raffi's assertion otherwise, Reynolds was a party to the transaction at issue in
2 this case. See Assignment and Assumption of Lease (Exhibit 16). Reynolds' assumption of the
3 personal guarantee of the Tivoli Village lease was a necessary condition for the transaction at issue
4 in this case. See Purchase and Sale Agreement, p.2, ¶ 8 (Exhibit C to Raffi's MSJ).

6 Reynolds is 85 years old - an "older person" as defined by Nevada law. Reynolds is also
7 the sole member and sole manager of Diamanti Fine Jewelers, LLC, and in order for the transaction
8 at issue in this case to proceed, Reynolds contributed the purchase price of \$529,253.44 to his LLC.
9 Raffi asserts that since Reynolds was not a party to the transaction at issue in this case, Reynolds has
10 not lost any money; so that Reynolds has no loss to be protected from.

12 The Nevada legislature intended NRS 41.1395 to protect "older persons" from financial
13 exploitation, and so it is a reasonable for this Court to find that Diamanti Fine Jewelers, LLC itself
14 qualifies for protection as an "older person" under the elder abuse statute. Reynolds is 85 years old;
15 he organized and funded the LLC, and is the sole member and manager of the LLC. Where required
16 by equity or common sense, Courts have found that an LLC is a person. See *e.g. Redmond v. CJD &*
17 *Assocs., LLC (In re Brooke Corp.)*, 506 B.R. 560, 572 (Bankr. D. Kan. 2014) (LLC is a person as defined
18 by 11 USC § 101(2)(C); *Takacs v. American Eurocopter, LLC*, 656 F.Supp.2d 640, 645 (W.D.Tex.2009)
19 (LLC is a person as defined by 28 USC § 1442(a)(1)); *Orgain v. City of Salisbury*, 521 F. Supp. 2d 465,
20 476 n.34 (D. Md. 2007) (LLC is a "person" for purposes of the Equal Protection and Due Process
21 Clauses of the Fourteenth Amendment).

23 Reynolds submits that the intent of Nevada's elder abuse statute is to protect older
24 persons from losses caused by financial exploitation. Plaintiff Diamanti Fine Jewelers, LLC is owned,
25 managed, and was organized, and funded by an Plaintiff Robert Reynolds. Raffi rightly asserts that
26
27
28

1 the transaction was consummated through Reynolds and Raffi's business entities, but Raffi's
2 incorrectly concludes that this factor is dispositive of the analysis. Fairness, equity, and common
3 sense support an interpretation of "older person" under NRS 41.1395(4)(d) to include a business
4 entity 100% owned and managed by a natural "older person" meeting the definition.
5

6 Finally, Raffi denies having Reynolds' trust and confidence based on a lack of a fiduciary
7 relationship. Nevada law neither defines trust and confidence for purposes of this statute, nor does
8 requires that such trust and confidence arise from a fiduciary relationship. Reynolds trusted and
9 believed Raffi's representations as to revenue, costs, customers, and title to the FF&E. The evidence
10 before this Court is thorough and convincing enough for a rational jury to find that Reynolds trusted
11 and was then deceived by Raffi in the context of the claims at issue in this case. Certainly, Raffi's
12 business brokers were left with that impression after participating in the closing of the transaction.
13 See Email (Exhibit 17). The evidence should be heard at trial before this question is answered.
14
15

16 V.
17

18 CONCLUSION

19 For the reasons set forth herein, Plaintiffs request that Defendants' Motion for Summary
20 Judgment be denied so that all four (4) claims at issue in this case can proceed to trial.

21 Dated this 4th day of September, 2018.
22

23 CHASEY LAW OFFICES

24 

25 PETER L. CHASEY, ESQ.

26 Nevada Bar No. 007650

27 3295 N. Fort Apache Road, Suite 110

28 Las Vegas, Nevada 89129

Attorney for Plaintiffs

ROBERT G. REYNOLDS and

DIAMANTI FINE JEWELERS, LLC

CERTIFICATE OF SERVICE

Pursuant to Rule 5(b) of the Nevada Rules of Civil Procedure, I hereby certify that on the 4th day of September, 2018, I served a true and complete copy of **PLAINTIFFS' OPPOSITION TO MOTION FOR SUMMARY JUDGMENT** upon those persons designated by the parties in the E-Service Master List for the above-referenced matter in the Eighth Judicial District Court eFiling System in accordance with the mandatory electronic service requirements of Administrative Order 14-2 and the Nevada Electronic Filing and Conversion Rules:

Terry A. Moore, Esq.
Christian T. Balducci, Esq.
MARQUIS AURBACH COFFING
10001 Park Run Drive
Las Vegas, NV 89145
(702) 382-0711 Phone
(702) 382-5816 Fax
Attorneys for Defendants

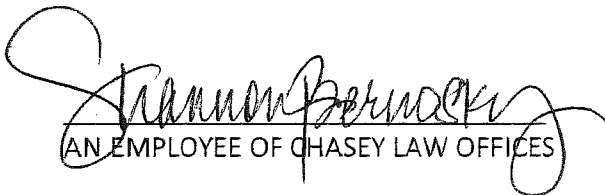

AN EMPLOYEE OF CHASEY LAW OFFICES

EXHIBIT 1

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DISTRICT COURT

CLARK COUNTY, NEVADA

ROBERT G. REYNOLDS, an)
individual, and)
DIAMANTI FINE JEWELERS,)
LLC, a Nevada Limited) Case No. A-17-753532-C
Liability Company,)
Plaintiffs,)
vs.)
RAFFI TUFENKJIAN, an)
individual, and LUXURY)
HOLDINGS LV, LLC, a)
Nevada Limited)
Liability Company, DOES)
1-10, and ROE)
CORPORATIONS 1-10)
inclusive,)
Defendants.)

DEPOSITION of RAFFI TUFENKJIAN
Taken on Thursday, July 26, 2018
At 9:56 a.m.
At 3295 North Fort Apache Road, Suite 110
Las Vegas, Nevada

Reported by: Lori-Ann Landers, CCR 792, RPR

Robert G. Reynolds, et al. vs. Raffi Tufenkjian, et al.

<p>1 had. He had ability to look in the layaways and see the</p> <p>2 layaways we had.</p> <p>3 So during the time that he would come in, he had</p> <p>4 full access in the store. Any documents he requested was</p> <p>5 provided to him.</p> <p>6 Q. Okay. My specific question is do you recall</p> <p>7 printing and delivering a customer list?</p> <p>8 A. I don't recall printing and delivering it, but</p> <p>9 he had access to it. Every time he came in, it's in the</p> <p>10 POS system.</p> <p>11 Q. And it's your testimony – the testimony that he</p> <p>12 also had access to all of the receipts?</p> <p>13 A. Yes.</p> <p>14 Q. Do you agree that if you were to print up the</p> <p>15 receipts and compare the names on the receipts, that they</p> <p>16 should match up to the list of customers?</p> <p>17 MR. BALDUCCI: Objection. Speculation.</p> <p>18 A. Not necessarily.</p> <p>19 Q. Okay. Describe for me how those two would</p> <p>20 differ.</p> <p>21 A. A list is compiled through sales. A list can</p> <p>22 also be compiled through in-store events where you do</p> <p>23 sales and they happen to bring in a friend, that we have</p> <p>24 a raffle, they may put their name in it.</p> <p>25 Q. Would those –</p>	<p>1 MR. BALDUCCI: Should he keep it or go to a</p> <p>2 different exhibit?</p> <p>3 MR. CHASEY: I thought he was looking at it to</p> <p>4 see whether he could identify it as the customer list.</p> <p>5 MR. BALDUCCI: Oh, okay.</p> <p>6 A. It's saying "Customers." I would say what would</p> <p>7 be the customer list.</p> <p>8 Q. So my question to you is do you recognize this</p> <p>9 document as a list printed by you and delivered to</p> <p>10 Mr. Reynolds during the due diligence process?</p> <p>11 A. I don't recollect if this was the actual item I</p> <p>12 printed or this was printed thereafter.</p> <p>13 Q. Okay. Do you have any understanding of whether</p> <p>14 or not people who would not have been customers of the</p> <p>15 Diamanti store at Tivoli, either because they did not</p> <p>16 make a purchase but rather came into the store and put</p> <p>17 their name on a list or for whatever reason – but do you</p> <p>18 have any understanding of whether noncustomers could be</p> <p>19 on this customer list?</p> <p>20 MR. BALDUCCI: Vague as to "customers."</p> <p>21 A. I wouldn't know.</p> <p>22 Q. Would you identify a person who came into the</p> <p>23 store because of some event, perhaps, that you are</p> <p>24 putting on, puts their name on a list but does not make a</p> <p>25 purchase – would you identify that person as a customer?</p>
<p>1 A. Any business does that.</p> <p>2 Q. Okay. Would the noncustomers – so, for</p> <p>3 instance, the people who visit the store, put their name</p> <p>4 on a guest list or under the circumstances you just</p> <p>5 described, would those people, the people who did not</p> <p>6 make a purchase, would they wind up on a customer list?</p> <p>7 A. They would wind up on a list. The program, if</p> <p>8 it lists it as a customer list, it would be on that list</p> <p>9 in order for us to send an invitation for store events</p> <p>10 and marketing material.</p> <p>11 Q. Okay.</p> <p>12 (Plaintiffs' Exhibit 8, REYNOLDS000240 through</p> <p>13 REYNOLDS000277, was marked for identification as of this</p> <p>14 date.)</p> <p>15 BY MR. CHASEY:</p> <p>16 Q. I'm going to – we can always come back to</p> <p>17 anything and pile it off to the side. I have handed you</p> <p>18 what I have marked as Exhibit 8. I represent to you that</p> <p>19 this is a customer list –</p> <p>20 A. Ah-huh.</p> <p>21 Q. – that my client will testify was given to him</p> <p>22 by you during the due diligence process.</p> <p>23 Do you recognize it as such?</p> <p>24 A. It states "Customers" in the statement or this</p> <p>25 document.</p>	<p>1 A. I believe the program lists clients' names or</p> <p>2 customers' names on our heading customer. To have the</p> <p>3 database of event – events that you have and they put</p> <p>4 their name for a drawing or a friend that they may have</p> <p>5 brought and showed some interest, because we have cards</p> <p>6 in the store that they would fill out if they see a piece</p> <p>7 of item, that was our process of running the business.</p> <p>8 We had a card; they would fill out their names.</p> <p>9 If they seen something they weren't at that moment</p> <p>10 purchasing, we would try to keep the name so that we can</p> <p>11 follow up. But also the list would include all the sales</p> <p>12 and clients that names were put in at the time of the</p> <p>13 sale. So mostly have a combination.</p> <p>14 Q. Okay. So the customer list would have also</p> <p>15 included noncustomers, but people who had indicated an</p> <p>16 interest in possibly receiving more information?</p> <p>17 MR. BALDUCCI: Objection. Vague and ambiguous.</p> <p>18 Mischaracterizes the term.</p> <p>19 A. This was the only format that the program allows</p> <p>20 you to put in names as a database to stay in touch with</p> <p>21 your customers or names that you may have collected that</p> <p>22 were going to come back and purchase.</p> <p>23 Q. Got it. Okay. I think we are done with</p> <p>24 Exhibit 8.</p> <p>25 (Plaintiffs' Exhibit 9, REYNOLDS001829 through</p>

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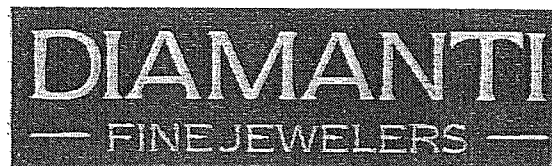
Page 74

Page 73

Page 75

EXHIBIT 7

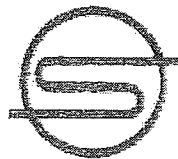
DIAMANTI FINE JEWELERS



CONFIDENTIAL

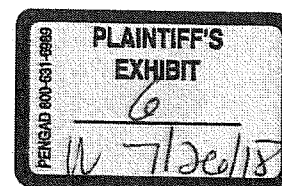
BUSINESS OPPORTUNITY SUMMARY

PRESENTED BY:



SUNBELT BUSINESS BROKERS
SALES, MERGERS & ACQUISITIONS
OVER 250 OFFICES WORLDWIDE

2300 W SAHARA AVE, SUITE 800
LAS VEGAS, NV 89102
702.364.2551



0778

LICENSE REQUIREMENTS:

A new owner will need a business license and also a second hand dealers license. The second hand dealer's license allows the purchase and sale of gold, diamonds and all jewelry. This license requires a background check and can take up to 3 months to receive.

ASSETS, FURNITURE, FIXTURES, & EQUIP:

The business is a completely furnished and functioning first class Jewelry Store and it is completely turn-key. All of the hard assets of the business are included in the price. These include approximately \$270,000 in furniture and fixtures, and equipment. The new owner should be able to allocate a reasonable portion of the purchase price to hard, depreciable assets, thus sheltering some of the future profits of the business.



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INVENTORY:

No inventory is included although it can be purchased at cost.

ORGANIZATION, STAFFING AND PAYROLL:

The business is staffed with 1 full time sales people and the jewelry repair and design person is an independent contractor.

ACCOUNTING METHOD:

The books are kept in house using a sophisticated register point of sale software. The financial reports are converted to a by the companies CPA to financial statements and tax returns are filed on a cash basis each calendar year.

TRAINING:

The Seller will provide 1 week of training and orderly turnover to the new owner training, at 40 hours per week. Additional training/consulting is available from the Seller, if required, for an additional negotiated fee.

NON-COMPETE:

The Seller will agree not compete with the Buyer, directly or indirectly, for a period of 5 years within a 50 mile radius of the business. This essentially protects the Buyer anywhere within the entire Las Vegas Valley.

LEGAL MATTERS & SELLER'S DISCLOSURES:

A detailed Disclosure Statement, made by the Seller regarding this business and the information presented herein, is will be made available to a buyer after an offer has been accepted and during due diligence. The company is not aware of any pending litigation and is not involved in any lawsuits.

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Diamanti Fine Jewelers
Adjusted Income Statement
Projection for the Year Ended December 2014

Income	Statement \$	Adjustment \$	Revised \$
Gross Sales	800,000	0	800,000
Other Income	0	0	0
Total Income	800,000	0	800,000
Cost of Goods Sold	330,400	0 ₁	330,400
Gross Profit	469,600		469,600
Expenses			
Advertising	981	0	981
Auto	8,933	8,933 ₂	0
Bank	2,937	0	2,937
Contributions	285	285 ₃	0
Cleaning	1,020	0	1,020
Contract Labor	32,995	0	32,995
Meals and Entertain	21,690	21,690 ₄	0
Office	5,778	0	5,778
Payroll	97,317	0	97,317
Payroll Taxes	10,917	0	10,917
Payroll Processing	2,476	0	2,476
Postage	3,179	0	3,179
Professional	1,614	0	1,614
Rent	71,478	0	71,478
Repairs	1,452	0	1,452
Security	2,324	0	2,324
Telephone	2,200	0	2,200
Travel	19,623	15,000 ₅	4,623
Utilities	4,338	0	4,338
Insurance	981	0	981
Interest	231	231	0
Other	277	0	277
Total Expenses	293,026	46,139	246,887
Net Profit / SDE (Before Taxes)	176,574	46,139	222,713

FOOTNOTES

- 1 41.3%
- 2 Non Business
- 3 Non Business
- 4 Non Business
- 5 Non Business

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Adjusted Income Summary

	<u>2014</u>	<u>Average</u>
Total Income	\$800,000	\$800,000
Cost of Goods	\$330,400	\$330,400
Gross Profit	\$469,600	\$469,600
Total Expenses	\$246,887	\$246,887
SDE	\$222,713	\$222,713

Asking Price

	<u>2014</u>	<u>Average</u>
Seller's Discretionary Earnings	\$222,713	\$222,713
SDE Weighting	100%	

Adjusted SDE	\$222,713	
Suggested Selling Price	\$463,243	Based on Multiple of 2.08

Price Comparables

Multiple of SDE	\$714,909	(Based on Multiple of 3.21 from Comps Below)
Multiple of Gross Sales	\$400,000	(Based on Multiple of .5)

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Exhibit 11

Customers - 1466 unique (1528 rows)

ID#	Last Name	First Name	Spouse Last	Spouse First	Phone	Phone	eMail
001-00000	CASH CUSTOMER						
001-00001	Janangelo	Mary Ann	Janangelo	Peter	cell	702-355-8852	HOME
001-00002	Caley	Donal			Home	702-236-7202	
001-00003	Prem	Alice			HOME	702-616-9752	
001-00004	Bellair	Arnold			Home	702-367-7287	
001-00006	Wellman	Lloyd			Home	702-809-5386	
001-00007	Nelson	Nicholas					
001-00008	Tobin	Megan			Home	702-882-6400	
001-00009	Fell	Linda			480-688-4163	Home	
001-00010	Waynick	Darlyn					
001-00011	Prem	Alice					
001-00012	Garcia	Vilma			Home	702-561-7463	
001-00013	Neveaux	Isabel			Home	702-527-7782	
001-00014	Derossi	Gordon			Home	702-925-8543	
001-00015	Kosaka	Yoji					
001-00016	Estes	Sherri			Home	702-813-7347	
001-00017	McGraw	Janet			Home	775-537-1683	
001-00018	Fisher	David			360-662-6573	Home	
001-00019	Senge	Alfred			Home	702-856-0053	
001-00020	Elselt	Susan			Home	702-759-1391	
001-00022	Scully	Michael			Work	619-954-6221	
001-00023	Farnsworth	Jerry					
001-00024	Dunlap	Jim			Home	702-373-4082	
001-00025	Eversman	Kunt					
001-00026	Leichner	Sagi					
001-00027	Winkler	Steven					
001-00028	Smith	Louise					
001-00029	Black	Euclid			Home	702-565-6903	
001-00030	Catalano	Frank			Home	702-396-4050	
001-00031	Beam	Susan			Home	702-858-2366	
001-00032	Blackorby	Jerry			Home	404-231-5105	
001-00033	Daane	Jayne					
001-00034	Monterde	Raymond					
001-00035	Tiemann	Dennis					
001-00037	Erickson	Ben					
001-00038	Sullivan	Preston					
001-00039	Beckham	James					
001-00040	Matukonis	Peter					
001-00041	Bernal	Fernando					
001-00042	Garn	Christopher			Home	702-458-1669	
001-00043	Dorenbosch	Thys			Home	702-778-6693	

REYNOLDS000240

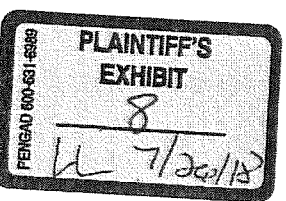


Exhibit 12

Inventory Report: In Stock By Category

: By ID: <none>; PO Status: <none>; Item Status: <all>; Pricing Methods: 'Pre-Marked', 'UOM Only', 'Item By UOM', 'UPC/SKU', 'Item Pricing';
Inventory Type: 'Memo', 'Consignment', 'Inventory'; Match Stones By Position: 'Any Stone'; Organize Resulting List: 'One Item Per Row', 'In
stock On 3/23/2015; Sort by Category, Department, Item Size, Item Length, Item Metal Color...; Show Price, Show Details; Show Cost

Item #	Vendor Style #	T/S	Description	Count	Age	Cost	Price	Margin
001-100-00082	NG:17156	S/I	18KT WHITE GOLD LADIES DIAMOND ENGAGEMENT RING	1,278		1,654.00	4,965.00	0.67
001-100-00085	NG:15728	S/I	14KT WHITE GOLD LADIES DIAMOND ENGAGEMENT RING	1,278		432.00	1,495.00	0.71
001-100-00087	NG:17075	S/S	ONE 18KT WHITE GOLD LADIES DIAMOND ENGAGEMENT RING	702		1,067.00	2,546.74	0.58
001-100-00090	NG:15429	S/I	ONE 18KT WHITE GOLD LADIES DIAMOND ENGAGEMENT RING	1,278		942.00	2,825.00	0.67
001-100-00091	NG:13037	S/S	ONE 18KT WHITE GOLD LADIES DIAMOND ENGAGEMENT RING	930		1,077.00	2,700.00	0.60
001-100-00096	NG:03469	S/S	ONE 14KT WHITE GOLD LADIES DIAMOND ENGAGEMENT RING	754		2,212.00	5,454.76	0.59
001-100-00106	NG:16572	S/I	ONE 18KT WHITE GOLD LADIES DIAMOND RING	1,278		887.00	2,855.00	0.69
001-100-00114	NG:15494	S/I	18KT WG DIAMOND ENGAGEMENT RING - DIA WEIGHT	1,103		1,892.00	3,979.00	0.52
001-100-00115	NG:18986	S/I	18KT WG DIAMOND ENGAGEMENT RING - DIA WEIGHT	1,103		1,151.00	3,745.00	0.69
001-100-00116	NG:18562	S/I	14KT WG DIAMOND ENGAGEMENT RING - DIA WEIGHT	1,103		1,121.00	3,645.00	0.69
001-100-00117	DIAM:03909	S/S	18KT WG DIAMOND ENGAGEMENT RING - DIA WEIGHT	311		1,896.51	3,996.00	0.53
001-100-00120	NG:19495	S/I	14KT WG DIAMOND ENGAGEMENT RING - DIA WEIGHT	1,103		1,361.00	4,385.00	0.69
001-100-00121	NG:17622	S/I	14KT WG DIAMOND ENGAGEMENT RING - DIA WEIGHT	1,103		765.00	2,495.00	0.69
001-100-00123	NG:12551	S/I	18KT WG AMETYST 7 DIAMOND RING - DIA WEIGHT 0.1	1,086		1,587.00	5,115.00	0.69
001-100-00124	NG:18165	S/I	18KT WG DIAMOND ENGAGEMENT RING - DIA WEIGHT	1,103		1,154.00	3,750.00	0.69
001-100-00128	NG:14127	S/I	18KT WG DIAMOND ENGAGEMENT RING - DIA WEIGHT	1,103		876.50	2,855.00	0.69
001-100-00134	NG:13385	S/I	14KT YG DIAMOND ENGAGEMENT RING - DIA WEIGHT	1,103		574.10	1,995.00	0.71
001-100-00141	DIAM:TVcoon	S/S	18kt white gold Tycoon cut diamond mounting with center ct	249		1,512.50	3,995.00	0.62
001-100-00143	DIAM:17565	S/I	18KT White Gold Diamond Engagement Ring.	871		1,754.50	3,975.00	0.56
001-100-00144	DIAM:17565	S/I	18KT White Gold Diamond Engagement Ring.	871		2,488.20	5,655.00	0.56
001-100-00145	DIAM:150101	S/I	14KT yellow Gold Diamond Engagement Ring.	868		3,620.83	9,890.00	0.63
001-100-00146	NG:17076	S/I	18KT WG DIAMOND SEMI-MOUNT RING DIA 0.80CT.	849		1,271.00	4,375.00	0.71
001-100-00147	NG:20366	S/I	18KT WG LADIES DIAMOND WEDDING SET DIA 2.21CT.	841		2,411.00	7,235.00	0.67
001-100-00148	NG:21017	S/S	18KT WG DIAMOND RING DIA 1.70CT	795		1,961.00	4,413.00	0.56
001-100-00149	NG:20997	S/S	14KT WG DIAMOND RING ENGAGEMENT. 0.81CT	793		1,372.10	2,936.50	0.53
001-100-00150	GP:11747	S/S	Lady's Yellow 14K Engagement Ring With 0.18Tw Round Di	231		520.00	1,248.00	0.58
001-100-00005	VA:52730	S/I	Lady's White 18 Karat 3 Stone Engagement Ring With 0.45	1,409		1,498.42	4,495.00	0.67
001-100-00008	VA:14518	S/I	Lady's White 18 Karat 3 Stone Engagement Ring With 0.45	1,409		690.69	2,270.00	0.70
001-100-00065	VA:55335	S/I	LADY'S WHITE GOLD 18 KARAT ENGAGEMENT RING	1,288		1,078.00	3,435.00	0.69
001-100-00066	VA:55501	S/S	LADY'S WHITE GOLD 18 KARAT ENGAGEMENT RING	756		942.06	2,312.67	0.59
001-100-00004	DIAM:CN-1164	S/I	PLATINUM INFINITY WEDDING BAND.	888		2,849.00	8,540.00	0.67
001-100-00054	DIAM:WGS15/WG	S/S	14K White Gold Solitaire Engagement Ring with Princess Ct	1,191		363.96	764.40	0.52
001-100-00055	DIAM:WGS15/WG	S/S	14K White Gold Solitaire Engagement Ring with Princess Ct	1,278		389.35	815.50	0.52
001-110-00040	DIAM:15510128	S/S	Lady's Yellow 14 Karat Wedding Band With 0.10Tw Round I	629		1,298.00	3,100.00	0.58
001-110-00041	NG:08241	S/I	14KT WHITE GOLD LADIES DOME SHAPE DIAMOND RIN	1,278		2,421.00	7,265.00	0.67
001-110-00042	NG:17603	S/S	18KT WHITE GOLD LADIES DIAMOND RING	958		2,651.00	6,500.00	0.59
001-110-00048	NG:18617	S/S	14KT WG DIAMOND BAND - DIA WEIGHT 0.64CT.	997		493.00	850.00	0.42
001-110-00049	NG:15206	S/S	14KT WG DIAMOND & RUBY RING.	466		743.10	2,250.00	0.67
001-110-00053	DIAM:B	S/I	One 14kt white gold ladies diamond ring	1,027		412.50	1,235.00	0.67
001-110-00055	DIAM:D	S/S	One 14kt white gold ladies diamond ring	936		382.80	900.00	0.57
001-110-00056	DIAM:E	S/S	One 14kt white gold ladies diamond ring	255		389.40	800.19	0.51
001-110-00061	DIAM:I	S/S	One 14kt white gold ladies diamond ring	158		389.40	740.06	0.47

Exhibit 13

BILL OF SALE

THIS BILL OF SALE is made as of the date set forth below between Luxury Holdings LV LLC ("Seller"), and Diamanti Fine Jewelers LLC ("Purchaser").

This Bill of Sale is made pursuant to that certain Purchase Agreement between Seller and Purchaser dated January 13, 2015 hereinafter the "Agreement", for the business commonly known as Diamanti Jewelry & Watches located at 410 S Rampart Blvd, Suite 140, Las Vegas, NV 89145. Capitalized terms used herein and not otherwise defined shall have the respective meanings set forth in the Agreement.

NOW, THEREFORE, for good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged and, pursuant to the Agreement, Seller hereby sells, conveys, assigns, transfers and delivers unto Purchaser, free and clear of all Liens, all of the rights, title and interest in and to the Assets described in the Agreement, more clearly defined and attached hereto as Exhibit A.

To have and to hold the same unto Purchaser, its successors and assigns forever

This Bill of Sale is subject to the terms and conditions set forth in the Agreement and nothing contained herein shall be construed to limit, terminate or expand the representations, warranties or covenants set forth in the Agreement.

The Seller shall execute such additional documents and perform such further acts as may be necessary or desirable to carry out the purposes of this Bill of Sale.

Dated as of March 24, 2015

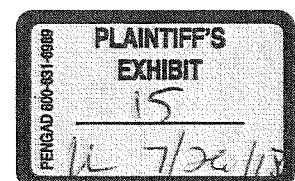
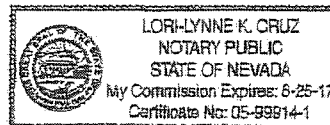
IN WITNESS WHEREOF, Seller has duly executed this Bill of Sale as of the date set forth above.

SELLER'S SIGNATURE(S):

[Signature]
Luxury Holdings LV LLC
Raffi Tufenkjian, Manager

Subscribed and Sworn to before me this 24 day of March, 2015.

[Signature]
Notary Public



Accelerated Law Group

REYNOLDS000200

0788

Exhibit A

Fixtures, Furniture & Equipment

Diamanti Jewelry & Watches

All Fixtures, Furniture and Equipment, all other Tangibles and Intangibles, located at 410 S Rampart Blvd, Suite 140, Las Vegas, NV 89145 and used in connection with the operation Diamanti Jewelry & Watches and as may be further defined by any list attached hereto.

INVENTORY OF FF&E

1. Nine (9) Jewelry Cases 2' x 10.5" x 21"
2. Three (3) Jewelry Cases 24" x 24"
3. Two (2) Large Window Frames
4. One (1) 8'10" x 2' Display Table
5. Nineteen (19) Built in Cases
6. Fifteen (15) Small Wall Hung Mirrors
7. One (1) Large Wall Hung Mirror
8. Jewelers Workstation – Built in Counter and Shelves
9. Cash Wrap Counter
10. Five (5) Jewelry Cases 3'8" x 1'10" x 3'3"
11. Four (4) Jewelry Tower Cases 4'3" x 1'7" x 1'7"
12. Samsung Programmable Business Phone System, includes (5) Phones model IDCS 28D
13. Net gear Router with 4 Port Switch, IP's, (2) CAT5e Patch Cable 5 ft.
14. ONKYO AV Receiver TX-NR509 & Four (4) Recessed Speakers
15. Storefront Illuminated Sign Cabinet (1) 160" X 32"
16. Storefront Illuminated Rampart Facing Sign Cabinet (1) 228" X 24"
17. Storefront Illuminated Sign Cabinet (1) 72" X 36"
18. Aluminum Oval Shape Sign fit inside Landlord Furnished Metal Frame
19. Aluminum Interior Illuminated Oval Sign Cabinet at Counter Area
20. Insignia 24" Color Monitor
21. Eight (8) EverFocus HDCCTV CAMERAS EBH5241W
22. One (1) Ever Focus EPHD08/8, 8CH HD CCTV 8TB DVR
23. Mutual LS-6034 TRTL 30 X 6 –Electronic Lock Combination Dial Pull Handle Safe
24. Eight (8) Jewelry Trays in Brown Stain
25. Whirlpool Top Mount Refrigerator W10343810A
26. Keurig Special Edition Coffee Brewer
27. Emerson 1000W Microwave Oven MW1337SB
28. One (1) 3' X 18" X 36" Three Level Metal Table
29. Dyson DC59 Digital Slim Cordless Vacuum CW9-US-DGA4330A
30. One (1) 30" Round White Lacquer Finish Dining Table
31. Three (3) Scavolini Design Chairs
32. One (1) Rubbermaid Stepstool
33. Logo Designed Stationary, Envelopes, Business Cards & Sales Forms
34. Base, Ring, Pendant, Earring, Necklace & Bracelet displays
35. Pillows For Rings
36. Mirror w/copper logo
37. Tray w/ copper logo
38. Ring, Earring, Pendant, Bracelet & Necklace Jewelry Boxes with Logo

Exhibit 14

INVENTORY

DIAMANTI

FINE JEWELRY - INC.

March 23, 2015

BILL OF SALE

Diamanti Fine Jewelers (Luxury Holdings LV LLC) hereby sells to Diamanti Fine Jewelers, LLC on this date certain jewelry store inventory consisting of rings, watches, diamonds and other fine jewelry products, as follows:

G. Panther, Inc \$ 28,352.00

National Gold & Diamond
Centre, Inc. \$ 88,085.79


Luxury Holdings LV LLC \$ 134,253.44

NAZARETH Tufenkjian \$ 50,000.00

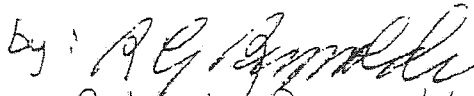
Total : \$ 300,691.23

(includes consignment product)

Luxury Holdings LV LLC

by: 
manager.

Diamanti Fine Jewelers, LLC

by: 
Robert Reynolds, managing member

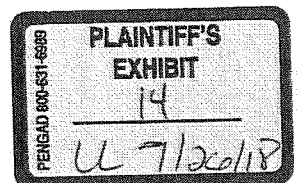


Exhibit 15

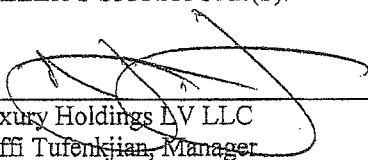
ALLOCATION OF PURCHASE PRICE

The following is the allocation of purchase price for the business commonly known as Diamanti Jewelry & Watches,
in Las Vegas, Nevada.

1	Equipment, Fixtures, Furniture	\$	100,000.00
2	Licenses	\$	-
3.	Leasehold Improvements	\$	-
4.	Inventory (Handled outside of escrow)	\$	134,253.44
5.	Customer Lists	\$	-
6.	Covenant Not To Compete	\$	-
7.	Franchises, Trade Name/Trade Mark	\$	-
8.	Goodwill	\$	295,000.00
9.	Real Property/Land	\$	-
10.	Real Property Improvements	\$	-
11.	Other Assets _____	\$	-
Total		\$	529,253.44

Agreed by:

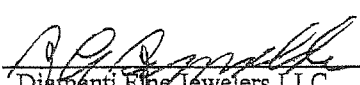
SELLER'S SIGNATURE(S):



Luxury Holdings LV LLC
Raffi Tufenkjian, Manager

Tax ID Number or Social Security Number

BUYER'S SIGNATURE(S):



Diamanti Fine Jewelers LLC
Robert G Reynolds, Manager

Tax ID Number or Social Security Number

Please keep this document as your Tax Advisor will require the above information when filing your tax return. This information will be required when filing Form 8594 with the Internal Revenue Service. Accelerated Escrow Company does not advise clients and customers as to any tax related issues. We suggest you contact your Tax Advisor for a complete understanding of the allocation of purchase price. Buyer and Seller will be provided a copy of this document for their records and related tax filings.

Exhibit 20

Item Cost History Report

5/17/2018
Page 1 of 48

1/11/2015 to 3/24/2015;1/11/2015 to 3/24/2015;Associate:Tufenkjian, Raffie (1);Group By:Item #, Date Changed;Sort By:Item #, Date Changed, Station, Associate, Vendor Invoice;

Item #	Description	Store	Station	Date Changed	Who Changed	Old Cost	New Cost	Cost Diff
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Item # 001-100-00003

Date Changed 2/22/2015

001-100-00003	Lady's White 18 Karat Contemporary Engagement Ring With C...	1	2	2/22/2015 12:48:50PM	#1: Tufenkjian, Raffie	\$1,001.70	\$1,101.87	\$100.17
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Date Changed 2/22/2015

Total Changes 1 \$100.17

Item # 001-100-00003

Total Changes 1 \$100.17

Item # 001-100-00004

Date Changed 2/22/2015

001-100-00004	PLATINUM INFINITY WEDDING BAND. (R) DR 0.33CT (220) DR	1	2	2/22/2015 11:52:32AM	#1: Tufenkjian, Raffie	\$3,215.80	\$2,590.00	\$-625.80
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001-100-00004	PLATINUM INFINITY WEDDING BAND. (R) DR 0.33CT (220) DR	1	2	2/22/2015 12:31:54PM	#1: Tufenkjian, Raffie	\$2,590.00	\$2,849.00	\$259.00
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Date Changed 2/22/2015

Total Changes 2 \$-366.80

Item # 001-100-00004

Total Changes 2 \$-366.80

Item # 001-100-00005

Date Changed 2/22/2015

001-100-00005	Lady's White 18 Karat 3 Stone Engagement Ring With 0.45Tw...	1	2	2/22/2015 12:48:51PM	#1: Tufenkjian, Raffie	\$1,362.20	\$1,496.42	\$136.22
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Date Changed 2/22/2015

Total Changes 1 \$136.22

Item # 001-100-00005

Total Changes 1 \$136.22

Item # 001-100-00008

Date Changed 2/22/2015

001-100-00008	Lady's White 18 Karat 3 Stone Engagement Ring With 0.45Tw...	1	2	2/22/2015 12:48:51PM	#1: Tufenkjian, Raffie	\$627.90	\$690.69	\$62.79
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Date Changed 2/22/2015

Total Changes 1 \$62.79

Item # 001-100-00008

Total Changes 1 \$62.79

Item # 001-100-00054

Date Changed 2/22/2015

001-100-00054	14k White Gold Solitaire Engagement Ring with Princess Cu...	1	2	2/22/2015 12:31:54PM	#1: Tufenkjian, Raffie	\$330.67	\$363.96	\$33.09
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Date Changed 2/22/2015

Total Changes 1 \$33.09

Item # 001-100-00054

Total Changes 1 \$33.09

Item # 001-100-00065

Date Changed 2/22/2015

001-100-00065	LADY'S WHITE GOLD 18 KARAT ENGAGEMENT RING 6.5 CZ CENTER	1	2	2/22/2015 12:48:51PM	#1: Tufenkjian, Raffie	\$980.00	\$1,078.00	\$98.00
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Date Changed 2/22/2015

Total Changes 1 \$98.00

Item # 001-100-00065

Total Changes 1 \$98.00

Item # 001-100-00066

Date Changed 2/22/2015

001-100-00066	LADY'S WHITE GOLD 18 KARAT ENGAGEMENT RING 6.45 CT ROUND	1	2	2/22/2015 12:48:51PM	#1: Tufenkjian, Raffie	\$856.42	\$942.05	\$85.64
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Date Changed 2/22/2015

Total Changes 1 \$85.64

Item # 001-100-00066

Total Changes 1 \$85.64

Item # 001-100-00117

Date Changed 1/11/2015

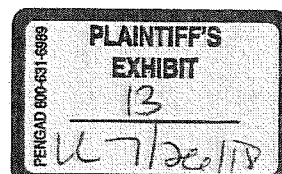
001-100-00117	18KT WG DIAMOND ENGAGEMENT RING - CENTER DIA WEIGHT 0.5	1	2	1/11/2015 12:51:15PM	#1: Tufenkjian, Raffie	\$574.10	\$1,724.10	\$1,150.00
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Date Changed 1/11/2015

Total Changes 1 \$1,150.00

Date Changed 2/22/2015

REYNOLDS001778



0796

EXHIBIT 21

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1 business broker and asked that Raffi either provide some further assurance of ownership to these
2 items or refund the money I had paid for the FF&E. I never received a response from Raffi.

3
4 7. After I agreed to purchase the business and was conducting my due diligence
5 investigation I asked for and reviewed monthly Nevada Sales and Use Tax Returns and I compared
6 those Sales Tax Returns to the information in the business computer. The numbers did not match
7 up exactly but the discrepancies appeared to be the result of a difference in the accounting method
8 used by Raffi to record sales in the computer vs. the way his CPA reported those sales to the State of
9 Nevada. In combination with Raffi's assurances of accuracy for the 2014 financial statement in the
10 Business Summary, I was satisfied with my due diligence and chose to proceed with the purchase.
11

12
13 8. During my deposition, Raffi's attorney's questions refreshed by anger and frustration
14 at losing more than half a million dollars and I let my anger show. I regret and apologize for my use
15 of profanity at deposition.

16 Pursuant to NRS 53.045, I declare under penalty of perjury under the laws of the State of
17 Nevada that the foregoing is true and correct.
18

19 Dated this 4TH day of September 2018.

20
21
22 
23 Robert G. Reynolds
24
25
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NEVADA DEPARTMENT OF TAXATION

TID No:001-TX-

1015629628-001

COMBINED SALES AND USE TAX RETURN

This return is for use by sellers of tangible property. If you are not a seller or no longer sell, please notify the Department of Taxation.

MAIL ORIGINAL TO:

STATE OF NEVADA - SALES/USE
PO Box 52609
PHOENIX, AZ 85072-2609

For Department Use Only

LUXURY HOLDINGS LV LLC
601 S RANCHO DR STE D32
LAS VEGAS, NV 89106

Return for month Ending 1/31/2014
Due on or before 2/28/2014
Date paid 2/18/2014

If the name or address shown is incorrect, if the ownership or business location has changed, or if you are out of business, notify a Nevada Department of Taxation District Office immediately.

IF POSTMARKED AFTER DUE DATE, PENALTY AND INTEREST WILL APPLY

A RETURN MUST BE FILED EVEN IF NO TAX LIABILITY EXISTS

ENTER AMOUNT IN COUNTY OF SALES/USE (OR COUNTY OF DELIVERY)	SALES TAX					USE TAX		
	TOTAL SALES	EXEMPT SALES	TAXABLE SALES	TAX RATE	CALCULATED TAX	AMOUNT SUBJECT TO USE TAX	TAX RATE	CALCULATED TAX
TAX CALCULATION FORMULA	COLUMN A	- COLUMN B	= COLUMN C	X COLUMN D	= COLUMN E	COLUMN F	X COLUMN G	= COLUMN H
01 CHURCHILL			0.00	7.800%	0.00		7.800%	0.00
02 CLARK	64,770.52	29,255.07	35,515.45	8.100%	2,876.75	0.00	7.750%	0.00
03 DOUGLAS			0.00	7.100%	0.00		7.100%	0.00
04 ELKO			0.00	6.850%	0.00		6.850%	0.00
05 ESMERALDA			0.00	6.850%	0.00		6.850%	0.00
06 EUREKA			0.00	6.850%	0.00		6.850%	0.00
07 HUMBOLDT			0.00	6.850%	0.00		6.850%	0.00
08 LANDER			0.00	7.100%	0.00		7.100%	0.00
09 LINCOLN			0.00	7.100%	0.00		7.100%	0.00
10 LYON			0.00	7.100%	0.00		7.100%	0.00
11 MINERAL			0.00	6.850%	0.00		6.850%	0.00
12 NYE			0.00	7.100%	0.00		7.100%	0.00
13 CARSON CITY			0.00	7.475%	0.00		7.475%	0.00
14 PERSHING			0.00	7.100%	0.00		7.100%	0.00
15 STOREY			0.00	7.600%	0.00		7.600%	0.00
16 WASHOE			0.00	7.725%	0.00		7.725%	0.00
17 WHITE PINE			0.00	7.725%	0.00		7.725%	0.00
TOTALS	64,770.52	29,255.07	35,515.45			0.00		

18. Total calculated sales (18a) and use (18b) tax

Sum of Column E

18a. 2,876.75

Sum of Column H

18b.

0.00

19. Enter collection allowance for timely filing (Line 18a x 0.25%)

19. 7.19

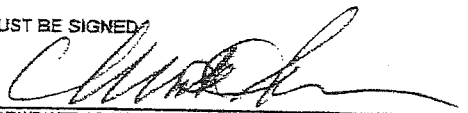
20. Net sales tax (Line 18a - Line 19)

20. 2,869.56

Collection allowance is for sales tax only. There is no collection allowance for use tax.

I HEREBY CERTIFY THAT THIS RETURN INCLUDING ANY ACCOMPANYING SCHEDULE AND STATEMENTS HAS BEEN EXAMINED BY ME AND TO THE BEST OF MY KNOWLEDGE AND BELIEF IS A TRUE, CORRECT AND COMPLETE RETURN.

RETURN MUST BE SIGNED



SIGNATURE OF TAXPAYER OR AUTHORIZED AGENT

CPA

702-645-6318

TITLE

PHONE NUMBER
(WITH AREA CODE)

FEDERAL TAX ID NUMBER (EIN OR SSN)

DATE
2/18/2014

21. Net sales and use tax (line 20 + line 18b)

21. 2,869.56

22. Penalty (line 21 x 10%)

22.

23. Interest (line 21 x 1% of months past due)

23.

24. Plus liabilities established by the department

24.

25. Less credit(s) approved by the department

25.

26. Total amount due and payable

26.

2,869.56

27. Total amount remitted with return

27.

2,869.56

MAKE CHECKS PAYABLE TO:
NEVADA DEPARTMENT OF TAXATION

Sales/Use Tax Return
TXR-01.01
Revised 09-29-06

REYNOLDS000344

0800

COMBINED SALES AND USE TAX RETURN

This return is for use by sellers of tangible property. If you are not a seller or no longer sell, please notify the Department of Taxation.

MAIL ORIGINAL TO: STATE OF NEVADA - SALES/USE
PO Box 52609
PHOENIX, AZ 85072-2609

For Department Use Only

LUXURY HOLDINGS LV LLC
601 S RANCHO DR STE D32
LAS VEGAS, NV 89106

Return for month Ending 2/28/2014
Due on or before 3/31/2014
Date paid 3/31/2014

If the name or address shown is incorrect, If the ownership or business location has changed, or if you are out of business, notify a Nevada Department of Taxation District Office immediately.

IF POSTMARKED AFTER DUE DATE, PENALTY AND INTEREST WILL APPLY

A RETURN MUST BE FILED EVEN IF NO TAX LIABILITY EXISTS

SALES TAX

USE TAX

ENTER AMOUNT IN COUNTY OF SALES/USE (OR COUNTY OF DELIVERY)						USE TAX		
						AMOUNT SUBJECT TO USE TAX	TAX RATE	CALCULATED TAX
TAX CALCULATION FORMULA	COLUMN A	- COLUMN B	= COLUMN C	X COLUMN D	= COLUMN E	COLUMN F	X COLUMN G	= COLUMN H
01 CHURCHILL			0.00	7.600%	0.00		7.600%	0.00
02 CLARK	29,063.77	4,576.75	24,487.02	8.100%	1,983.45	0.00	7.750%	0.00
03 DOUGLAS			0.00	7.100%	0.00		7.100%	0.00
04 ELKO			0.00	6.850%	0.00		6.850%	0.00
05 ESMEERALDA			0.00	6.850%	0.00		6.850%	0.00
06 EUREKA			0.00	6.850%	0.00		6.850%	0.00
07 HUMBOLDT			0.00	6.850%	0.00		6.850%	0.00
08 LANDER			0.00	7.100%	0.00		7.100%	0.00
09 LINCOLN			0.00	7.100%	0.00		7.100%	0.00
10 LYON			0.00	7.100%	0.00		7.100%	0.00
11 MINERAL			0.00	6.850%	0.00		6.850%	0.00
12 NYE			0.00	7.100%	0.00		7.100%	0.00
13 CARSON CITY			0.00	7.475%	0.00		7.475%	0.00
14 PERSHING			0.00	7.100%	0.00		7.100%	0.00
15 STOREY			0.00	7.600%	0.00		7.600%	0.00
16 WASHOE			0.00	7.725%	0.00		7.725%	0.00
17 WHITE PINE			0.00	7.725%	0.00		7.725%	0.00
TOTALS	29,063.77	4,576.75	24,487.02			0.00		

18. Total calculated sales (18a) and use (18b) tax Sum of Column E
19. Enter collection allowance for timely filing (Line 18a x 0.25%)
20. Net sales tax (Line 18a - Line 19)

- 18a. 1,983.45 Sum of Column H 18b. 0.00
19. 4.96
20. 1,978.49
Collection allowance is for sales tax only. There is no collection allowance for use tax.

I HEREBY CERTIFY THAT THIS RETURN INCLUDING ANY ACCOMPANYING SCHEDULE AND STATEMENTS HAS BEEN EXAMINED BY ME AND TO THE BEST OF MY KNOWLEDGE AND BELIEF IS A TRUE, CORRECT AND COMPLETE RETURN.

RETURN MUST BE SIGNED

Mark Sherman

SIGNATURE OF TAXPAYER OR AUTHORIZED AGENT

CPA 702-645-6318

TITLE PHONE NUMBER (WITH AREA CODE)

FEDERAL TAX ID NUMBER (EIN OR SSN) DATE 3/31/2014

21. Net sales and use tax (line 20 + line 18b) 21. 1,978.49
22. Penalty (line 21 x 10%) 22.
23. Interest (line 21 x 1% of months past due) 23.
24. Plus liabilities established by the department 24.
25. Less credit(s) approved by the department 25.
26. Total amount due and payable 26. 1,978.49
27. Total amount remitted with return 27. 1,978.49

MAKE CHECKS PAYABLE TO:
NEVADA DEPARTMENT OF TAXATION

Sales/Use Tax Return
TXR-01.01
Revised 09-29-06

COMBINED SALES AND USE TAX RETURN

This return is for use by sellers of tangible property. If you are not a seller or no longer sell, please notify the Department of Taxation.

MAIL ORIGINAL TO: STATE OF NEVADA - SALES/USE
PO Box 52609
PHOENIX, AZ 85072-2609

For Department Use Only

LUXURY HOLDINGS LV LLC
601 S RANCHO DR STE D32
LAS VEGAS, NV 89106

Return for month Ending 3/31/2014
Due on or before 4/30/2014
Date paid 4/23/2014

If the name or address shown is incorrect, if the ownership or business location has changed, or if you are out of business, notify a Nevada Department of Taxation District Office immediately.

IF POSTMARKED AFTER DUE DATE, PENALTY AND INTEREST WILL APPLY

A RETURN MUST BE FILED EVEN IF NO TAX LIABILITY EXISTS

SALES TAX

USE TAX

ENTER AMOUNT IN COUNTY OF SALES/USE (OR COUNTY OF DELIVERY)	TOTAL SALES	EXEMPT SALES	TAXABLE SALES	TAX RATE	CALCULATED TAX	AMOUNT SUBJECT TO USE TAX	TAX RATE	CALCULATED TAX
TAX CALCULATION FORMULA	COLUMN A	- COLUMN B	= COLUMN C	X COLUMN D	= COLUMN E	COLUMN F	X COLUMN G	= COLUMN H
01 CHURCHILL			0.00	7.600%	0.00		7.600%	0.00
02 CLARK	40,158.36	26,006.00	14,152.36	8.100%	1,146.34	0.00	7.750%	0.00
03 DOUGLAS			0.00	7.100%	0.00		7.100%	0.00
04 ELKO			0.00	6.850%	0.00		6.850%	0.00
05 ESMEBELDA			0.00	6.850%	0.00		6.850%	0.00
06 EUREKA			0.00	6.850%	0.00		6.850%	0.00
07 HUMBOLDT			0.00	6.850%	0.00		6.850%	0.00
08 LANDER			0.00	7.100%	0.00		7.100%	0.00
09 LINCOLN			0.00	7.100%	0.00		7.100%	0.00
10 LYON			0.00	7.100%	0.00		7.100%	0.00
11 MINERAL			0.00	6.850%	0.00		6.850%	0.00
12 NYE			0.00	7.100%	0.00		7.100%	0.00
13 CARSON CITY			0.00	7.475%	0.00		7.475%	0.00
14 PERSHING			0.00	7.100%	0.00		7.100%	0.00
15 STOREY			0.00	7.600%	0.00		7.600%	0.00
16 WASHOE			0.00	7.725%	0.00		7.725%	0.00
17 WHITE PINE			0.00	7.725%	0.00		7.725%	0.00
TOTALS	40,158.36	26,006.00	14,152.36			0.00		

18. Total calculated sales (18a) and use (18b) tax

Sum of Column E

18a. 1,146.34

Sum of Column H 18b.

0.00

19. Enter collection allowance for timely filing (Line 18a x 0.25%)

19. 2.87

Collection allowance is for sales tax only. There is no collection allowance for use tax.

20. Net sales tax (Line 18a - Line 19)

20. 1,143.47

I HEREBY CERTIFY THAT THIS RETURN INCLUDING ANY ACCOMPANYING SCHEDULE AND STATEMENTS HAS BEEN EXAMINED BY ME AND TO THE BEST OF MY KNOWLEDGE AND BELIEF IS A TRUE, CORRECT AND COMPLETE RETURN.

RETURN MUST BE SIGNED

Mark Steiner

SIGNATURE OF TAXPAYER OR AUTHORIZED AGENT

CPA 702-645-6318

TITLE PHONE NUMBER
(WITH AREA CODE)

4/23/2014

FEDERAL TAX ID NUMBER (EIN OR SSN)

DATE

21. Net sales and use tax (line 20 + line 18b)

21. 1,143.47

22. Penalty (line 21 x 10%)

22.

23. Interest (line 21 x 1% of months past due)

23.

24. Plus liabilities established by the department

24.

25. Less credit(s) approved by the department

25.

26. Total amount due and payable

26. 1,143.47

27. Total amount remitted with return

27. 1,143.47

MAKE CHECKS PAYABLE TO:

NEVADA DEPARTMENT OF TAXATION

Sales/Use Tax Return

TXR-01.01

Revised 09-29-06

COMBINED SALES AND USE TAX RETURN

This return is for use by sellers of tangible property. If you are not a seller or no longer sell, please notify the Department of Taxation.

MAIL ORIGINAL TO: STATE OF NEVADA - SALES/USE
PO Box 52609
PHOENIX, AZ 85072-2609

For Department Use Only

LUXURY HOLDINGS LV LLC
601 S RANCHO DR STE D32
LAS VEGAS, NV 89106

Return for month Ending 4/30/2014
Due on or before 5/31/2014
Date paid 5/21/2014

If the name or address shown is incorrect, if the ownership or business location has changed, or if you are out of business, notify a Nevada Department of Taxation District Office immediately.

IF POSTMARKED AFTER DUE DATE, PENALTY AND INTEREST WILL APPLY

A RETURN MUST BE FILED EVEN IF NO TAX LIABILITY EXISTS

SALES TAX

USE TAX

ENTER AMOUNT IN COUNTY OF SALES/USE (OR COUNTY OF DELIVERY)	TOTAL SALES	EXEMPT SALES	TAXABLE SALES	TAX RATE	CALCULATED TAX	AMOUNT SUBJECT TO USE TAX	TAX RATE	CALCULATED TAX
TAX CALCULATION FORMULA	COLUMN A	- COLUMN B	= COLUMN C	X COLUMN D	= COLUMN E	COLUMN F	X COLUMN G	= COLUMN H
01 CHURCHILL			0.00	7.600%	0.00		7.600%	0.00
02 CLARK	110,884.80	50,732.00	60,152.80	8.100%	4,872.38	0.00	8.100%	0.00
03 DOUGLAS			0.00	7.100%	0.00		7.100%	0.00
04 ELKO			0.00	6.850%	0.00		6.850%	0.00
05 ESMEERALDA			0.00	6.850%	0.00		6.850%	0.00
06 EUREKA			0.00	6.850%	0.00		6.850%	0.00
07 HUMBOLDT			0.00	6.850%	0.00		6.850%	0.00
08 LANDER			0.00	7.100%	0.00		7.100%	0.00
09 LINCOLN			0.00	7.100%	0.00		7.100%	0.00
10 LYON			0.00	7.100%	0.00		7.100%	0.00
11 MINERAL			0.00	6.850%	0.00		6.850%	0.00
12 NYE			0.00	7.100%	0.00		7.100%	0.00
13 CARSON CITY			0.00	7.475%	0.00		7.475%	0.00
14 PERSHING			0.00	7.100%	0.00		7.100%	0.00
15 STOREY			0.00	7.600%	0.00		7.600%	0.00
16 WASHOE			0.00	7.725%	0.00		7.725%	0.00
17 WHITE PINE			0.00	7.725%	0.00		7.725%	0.00
TOTALS	110,884.80	50,732.00	60,152.80			0.00		

18. Total calculated sales (18a) and use (18b) tax

Sum of Column E

18a. 4,872.38

Sum of Column H

18b. 0.00

19. Enter collection allowance for timely filing (Line 18a x 0.25%)

19. 12.18

Collection allowance is for sales tax only. There is no collection allowance for use tax.

20. Net sales tax (Line 18a - Line 19)

20. 4,860.20

I HEREBY CERTIFY THAT THIS RETURN INCLUDING ANY ACCOMPANYING SCHEDULE AND STATEMENTS HAS BEEN EXAMINED BY ME AND TO THE BEST OF MY KNOWLEDGE AND BELIEF IS A TRUE, CORRECT AND COMPLETE RETURN.

RETURN MUST BE SIGNED

Mark Steiner

SIGNATURE OF TAXPAYER OR AUTHORIZED AGENT

CPA 702-645-6318

TITLE PHONE NUMBER (WITH AREA CODE)

5/21/2014
FEDERAL TAX ID NUMBER (EIN OR SSN) DATE

21. Net sales and use tax (line 20 + line 18b)

21. 4,860.20

22. Penalty (line 21 x 10%)

22.

23. Interest (line 21 x 1% of months past due)

23.

24. Plus liabilities established by the department

24.

25. Less credit(s) approved by the department

25.

26. Total amount due and payable

26. 4,860.20

27. Total amount remitted with return

27. 4,860.20

MAKE CHECKS PAYABLE TO:
NEVADA DEPARTMENT OF TAXATION

Sales/Use Tax Return
TXR-01.01
Revised 09-29-06

COMBINED SALES AND USE TAX RETURN

This return is for use by sellers of tangible property. If you are not a seller or no longer sell, please notify the Department of Taxation.

MAIL ORIGINAL TO: STATE OF NEVADA - SALES/USE
PO Box 52609
PHOENIX, AZ 85072-2609

For Department Use Only

LUXURY HOLDINGS LV LLC
601 S RANCHO DR STE D32
LAS VEGAS, NV 89106

Return for month Ending 5/31/2014
Due on or before 6/30/2014
Date paid 6/17/2014

If the name or address shown is incorrect, if the ownership or business location has changed, or if you are out of business, notify a Nevada Department of Taxation District Office immediately.

IF POSTMARKED AFTER DUE DATE, PENALTY AND INTEREST WILL APPLY

A RETURN MUST BE FILED EVEN IF NO TAX LIABILITY EXISTS

SALES TAX

USE TAX

ENTER AMOUNT IN COUNTY OF SALES/USE (OR COUNTY OF DELIVERY)	TOTAL SALES	EXEMPT SALES	TAXABLE SALES	TAX RATE	CALCULATED TAX	AMOUNT SUBJECT TO USE TAX	TAX RATE	CALCULATED TAX
TAX CALCULATION FORMULA	COLUMN A	- COLUMN B	= COLUMN C	X COLUMN D	= COLUMN E	COLUMN F	X COLUMN G	= COLUMN H
01. CHURCHILL			0.00	7.500%	0.00		7.500%	0.00
02. CLARK	56,532.05	20,048.00	36,484.05	8.100%	2,955.21	0.00	8.100%	0.00
03. DOUGLAS			0.00	7.100%	0.00		7.100%	0.00
04. ELKO			0.00	6.850%	0.00		6.850%	0.00
05. EMERALD			0.00	6.850%	0.00		6.850%	0.00
06. EUREKA			0.00	6.850%	0.00		6.850%	0.00
07. HUMBOLDT			0.00	6.850%	0.00		6.850%	0.00
08. LANDER			0.00	7.100%	0.00		7.100%	0.00
09. LINCOLN			0.00	7.100%	0.00		7.100%	0.00
10. LYON			0.00	7.100%	0.00		7.100%	0.00
11. MINERAL			0.00	6.850%	0.00		6.850%	0.00
12. NYE			0.00	7.100%	0.00		7.100%	0.00
13. CARSON CITY			0.00	7.475%	0.00		7.475%	0.00
14. PERSHING			0.00	7.100%	0.00		7.100%	0.00
15. STOREY			0.00	7.500%	0.00		7.500%	0.00
16. WASHOE			0.00	7.725%	0.00		7.725%	0.00
17. WHITE PINE			0.00	7.725%	0.00		7.725%	0.00
TOTALS	56,532.05	20,048.00	36,484.05			0.00		

18. Total calculated sales (18a) and use (18b) tax

Sum of Column E

18a. 2,955.21

Sum of Column H

18b. 0.00

19. Enter collection allowance for timely filing (Line 18a x 0.25%)

19. 7.39

Collection allowance is for sales tax only. There is no collection allowance for use tax.

20. Net sales tax (Line 18a - Line 19)

20. 2,947.82

I HEREBY CERTIFY THAT THIS RETURN INCLUDING ANY ACCOMPANYING SCHEDULE AND STATEMENTS HAS BEEN EXAMINED BY ME AND TO THE BEST OF MY KNOWLEDGE AND BELIEF IS A TRUE, CORRECT AND COMPLETE RETURN.

RETURN MUST BE SIGNED

SIGNATURE OF TAXPAYER OR AUTHORIZED AGENT

CPA

702-645-6318

TITLE

PHONE NUMBER
(WITH AREA CODE)

FEDERAL TAX ID NUMBER (EIN OR SSN)

DATE 6/17/2014

21. Net sales and use tax (line 20 + line 18b)

21. 2,947.82

22. Penalty (line 21 x 10%)

22.

23. Interest (line 21 x 1% of months past due)

23.

24. Plus liabilities established by the department

24.

25. Less credit(s) approved by the department

25.

26. Total amount due and payable

26. 2,947.82

27. Total amount remitted with return

27. 2,947.82

MAKE CHECKS PAYABLE TO:
NEVADA DEPARTMENT OF TAXATION

Sales/Use Tax Return
TXR-01.01
Revised 05-29-06

COMBINED SALES AND USE TAX RETURN

This return is for use by sellers of tangible property. If you are not a seller or no longer sell, please notify the Department of Taxation.

MAIL ORIGINAL TO: STATE OF NEVADA - SALES/USE
PO Box 52809
PHOENIX, AZ 85072-2809

For Department Use Only

LUXURY HOLDINGS LV LLC
601 S RANCHO DR STE D32
LAS VEGAS, NV 89106

Return for month Ending 6/30/2014
Due on or before 7/31/2014
Date paid 7/15/2014

If the name or address shown is incorrect, if the ownership or business location has changed, or if you are out of business, notify a Nevada Department of Taxation District Office immediately.

IF POSTMARKED AFTER DUE DATE, PENALTY AND INTEREST WILL APPLY

A RETURN MUST BE FILED EVEN IF NO TAX LIABILITY EXISTS

SALES TAX**USE TAX**

ENTER AMOUNT IN COUNTY OF SALES/USE (OR COUNTY OF DELIVERY)	SALES TAX					USE TAX		
	TOTAL SALES	EXEMPT SALES	TAXABLE SALES	TAX RATE	CALCULATED TAX	AMOUNT SUBJECT TO USE TAX	TAX RATE	CALCULATED TAX
TAX CALCULATION FORMULA	COLUMN A	- COLUMN B	= COLUMN C	X COLUMN D	= COLUMN E	COLUMN F	X COLUMN G	= COLUMN H
01 CHURCHILL			0.00	7.600%	0.00		7.600%	0.00
02 CLARK	49,027.61	8,825.64	40,201.97	8.100%	3,256.36	0.00	8.100%	0.00
03 DOUGLAS			0.00	7.100%	0.00		7.100%	0.00
04 ELKO			0.00	6.850%	0.00		6.850%	0.00
05 MESQUERA			0.00	6.850%	0.00		6.850%	0.00
06 EUREKA			0.00	6.850%	0.00		6.850%	0.00
07 HUMBOLDT			0.00	6.850%	0.00		6.850%	0.00
08 LANDER			0.00	7.100%	0.00		7.100%	0.00
09 LINCOLN			0.00	7.100%	0.00		7.100%	0.00
10 LYON			0.00	7.100%	0.00		7.100%	0.00
11 MINERAL			0.00	6.850%	0.00		6.850%	0.00
12 NYE			0.00	7.100%	0.00		7.100%	0.00
13 CARSON CITY			0.00	7.475%	0.00		7.475%	0.00
14 PERSHING			0.00	7.100%	0.00		7.100%	0.00
15 STOREY			0.00	7.600%	0.00		7.600%	0.00
16 WASHOE			0.00	7.725%	0.00		7.725%	0.00
17 WHITEPINE			0.00	7.725%	0.00		7.725%	0.00
TOTALS	49,027.61	8,825.64	40,201.97			0.00		

18. Total calculated sales (18a) and use (18b) tax

Sum of Column E

18a. 3,256.36

Sum of Column H 18b.

0.00

19. Enter collection allowance for timely filing (Line 18a x 0.25%)

19. 8.14

20. Net sales tax (Line 18a - Line 19)

20. 3,248.22

Collection allowance is for sales tax only. There is no collection allowance for use tax.

I HEREBY CERTIFY THAT THIS RETURN INCLUDING ANY ACCOMPANYING SCHEDULE AND STATEMENTS HAS BEEN EXAMINED BY ME AND TO THE BEST OF MY KNOWLEDGE AND BELIEF IS A TRUE, CORRECT AND COMPLETE RETURN.

RETURN MUST BE SIGNED

SIGNATURE OF TAXPAYER OR AUTHORIZED AGENT

CPA 702-645-6318

TITLE PHONE NUMBER
(WITH AREA CODE)

FEDERAL TAX ID NUMBER (EIN OR SSN)

DATE

7/15/2014

21. Net sales and use tax (line 20 + line 18b)

21. 3,248.22

22. Penalty (line 21 x 10%)

22.

23. Interest (line 21 x 1% of months past due)

23.

24. Plus liabilities established by the department

24.

25. Less credit(s) approved by the department

25.

26. Total amount due and payable

26. 3,248.22

27. Total amount remitted with return

27. 3,248.22

MAKE CHECKS PAYABLE TO:
NEVADA DEPARTMENT OF TAXATION

Sales/Use Tax Return
TXR-01.01
Revised 06-29-06

COMBINED SALES AND USE TAX RETURN

This return is for use by sellers of tangible property. If you are not a seller or no longer sell, please notify the Department of Taxation.

MAIL ORIGINAL TO: STATE OF NEVADA - SALES/USE
PO Box 52609
PHOENIX, AZ 85072-2609

For Department Use Only

LUXURY HOLDINGS LV LLC
601 S RANCHO DR STE D32
LAS VEGAS, NV 89106

Return for month Ending 7/31/2014
Due on or before 8/31/2014
Date paid 8/14/2014

If the name or address shown is incorrect, if the ownership or business location has changed, or if you are out of business, notify a Nevada Department of Taxation District Office immediately.

IF POSTMARKED AFTER DUE DATE, PENALTY
AND INTEREST WILL APPLY

A RETURN MUST BE FILED EVEN IF NO TAX LIABILITY EXISTS

SALES TAX

USE TAX

ENTER AMOUNT IN COUNTY OF SALES/USE (OR COUNTY OF DELIVERY)		SALES TAX					USE TAX		
		TOTAL SALES	EXEMPT SALES	TAXABLE SALES	TAX RATE	CALCULATED TAX	AMOUNT SUBJECT TO USE TAX	TAX RATE	CALCULATED TAX
TAX CALCULATION FORMULA	COLUMN A	- COLUMN B	= COLUMN C	X COLUMN D	= COLUMN E	COLUMN F	X COLUMN G	= COLUMN H	
01 CHURCHILL			0.00	7.600%	0.00		7.600%	0.00	
02 CLARK	25,176.05	9,239.00	15,937.05	8.100%	1,290.90	0.00	8.100%	0.00	
03 DOUGLAS			0.00	7.100%	0.00		7.100%	0.00	
04 ELKO			0.00	6.850%	0.00		6.850%	0.00	
05 ESMEVELDA			0.00	6.850%	0.00		6.850%	0.00	
06 EUREKA			0.00	6.850%	0.00		6.850%	0.00	
07 HUMBOLDT			0.00	6.850%	0.00		6.850%	0.00	
08 LANDER			0.00	7.100%	0.00		7.100%	0.00	
09 LINCOLN			0.00	7.100%	0.00		7.100%	0.00	
10 LYON			0.00	7.100%	0.00		7.100%	0.00	
11 MINERAL			0.00	6.850%	0.00		6.850%	0.00	
12 NYE			0.00	7.100%	0.00		7.100%	0.00	
13 CARSON CITY			0.00	7.475%	0.00		7.475%	0.00	
14 PERSHING			0.00	7.100%	0.00		7.100%	0.00	
15 STOREY			0.00	7.600%	0.00		7.600%	0.00	
16 WASHOE			0.00	7.725%	0.00		7.725%	0.00	
17 WHITE PINE			0.00	7.725%	0.00		7.725%	0.00	
TOTALS	25,176.05	9,239.00	15,937.05			0.00			

18. Total calculated sales (18a) and use (18b) tax

Sum of Column E

18a. 1,290.90

Sum of Column H 18b.

0.00

19. Enter collection allowance for timely filing (Line 18a x 0.25%)

19. 3.23

Collection allowance is for sales tax only. There is no collection allowance for use tax.

20. Net sales tax (Line 18a - Line 19)

20. 1,287.67

I HEREBY CERTIFY THAT THIS RETURN INCLUDING ANY ACCOMPANYING SCHEDULE
AND STATEMENTS HAS BEEN EXAMINED BY ME AND TO THE BEST OF MY
KNOWLEDGE AND BELIEF IS A TRUE, CORRECT AND COMPLETE RETURN.

RETURN MUST BE SIGNED



SIGNATURE OF TAXPAYER OR AUTHORIZED AGENT

CPA 702-645-6318

TITLE

PHONE NUMBER
(WITH AREA CODE)

FEDERAL TAX ID NUMBER (EIN OR SSN)

DATE 8/14/2014

21. Net sales and use tax (line 20 + line 18b)

21. 1,287.67

22. Penalty (line 21 x 10%)

22.

23. Interest (line 21 x 1% of months past due)

23.

24. Plus liabilities established by the department

24.

25. Less credit(s) approved by the department

25.

26. Total amount due and payable

26. 1,287.67

27. Total amount remitted with return

27. 1,287.67

MAKE CHECKS PAYABLE TO:
NEVADA DEPARTMENT OF TAXATION

Sales/Use Tax Return
TXR-01.01
Revised 09-29-06

NEVADA DEPARTMENT OF TAXATION

TID No:001-TX-

1015629628-001

COMBINED SALES AND USE TAX RETURN

This return is for use by sellers of tangible property. If you are not a seller or no longer sell, please notify the Department of Taxation.

MAIL ORIGINAL TO: STATE OF NEVADA - SALES/USE
PO Box 52608
PHOENIX, AZ 85072-2608

For Department Use Only

LUXURY HOLDINGS LV LLC
601 S RANCHO DR STE D32
LAS VEGAS, NV 89106

Return for month Ending 8/31/2014
Due on or before 9/30/2014
Date paid 9/30/2014

If the name or address shown is incorrect, if the ownership or business location has changed, or if you are out of business, notify a Nevada Department of Taxation District Office immediately.

IF POSTMARKED AFTER DUE DATE, PENALTY AND INTEREST WILL APPLY

A RETURN MUST BE FILED EVEN IF NO TAX LIABILITY EXISTS

SALES TAX

USE TAX

ENTER AMOUNT IN COUNTY OF SALES/USE (OR COUNTY OF DELIVERY)	SALES TAX					USE TAX		
	TOTAL SALES	EXEMPT SALES	TAXABLE SALES	TAX RATE	CALCULATED TAX	AMOUNT SUBJECT TO USE TAX	TAX RATE	CALCULATED TAX
TAX CALCULATION FORMULA	COLUMN A	COLUMN B	= COLUMN C	X COLUMN D	= COLUMN E	COLUMN F	X COLUMN G	= COLUMN H
01 CHURCHILL			0.00	7.600%	0.00		7.600%	0.00
02 CLARK	36,641.35	8,403.50	28,237.85	8.100%	2,287.27	0.00	8.100%	0.00
03 DOUGLAS			0.00	7.100%	0.00		7.100%	0.00
04 ELKO			0.00	6.850%	0.00		6.850%	0.00
05 ESMERALDA			0.00	6.850%	0.00		6.850%	0.00
06 EUREKA			0.00	6.850%	0.00		6.850%	0.00
07 HUMBOLDT			0.00	6.850%	0.00		6.850%	0.00
08 LANDER			0.00	7.100%	0.00		7.100%	0.00
09 LINCOLN			0.00	7.100%	0.00		7.100%	0.00
10 LYON			0.00	7.100%	0.00		7.100%	0.00
11 MINERAL			0.00	6.850%	0.00		6.850%	0.00
12 NYE			0.00	7.100%	0.00		7.100%	0.00
13 CARSON CITY			0.00	7.475%	0.00		7.475%	0.00
14 PERSHING			0.00	7.100%	0.00		7.100%	0.00
15 STOREY			0.00	7.600%	0.00		7.600%	0.00
16 WASHOE			0.00	7.725%	0.00		7.725%	0.00
17 WHITE PINE			0.00	7.725%	0.00		7.725%	0.00
TOTALS	36,641.35	8,403.50	28,237.85			0.00		0.00

18. Total calculated sales (18a) and use (18b) tax

Sum of Column E

18. Enter collection allowance for timely filing (Line 18a x 0.25%)

20. Net sales tax (Line 18a - Line 19)

18a.	2,287.27
19.	5.72
20.	2,281.55

Sum of Column H 18b.

Collection allowance is for sales tax only. There is no collection allowance for use tax.

I HEREBY CERTIFY THAT THIS RETURN INCLUDING ANY ACCOMPANYING SCHEDULE AND STATEMENTS HAS BEEN EXAMINED BY ME AND TO THE BEST OF MY KNOWLEDGE AND BELIEF IS A TRUE, CORRECT AND COMPLETE RETURN.

RETURN MUST BE SIGNED

SIGNATURE OF TAXPAYER OR AUTHORIZED AGENT

CPA

702-645-6318

TITLE

PHONE NUMBER
(WITH AREA CODE)

FEDERAL TAX ID NUMBER (EIN OR SSN)

DATE 9/30/2014

21. Net sales and use tax (line 20 + line 18b)

22. Penalty (line 21 x 10%)

23. Interest (line 21 x 1% of months past due)

24. Plus liabilities established by the department

25. Less credit(s) approved by the department

26. Total amount due and payable

27. Total amount remitted with return

21.

22.

23.

24.

25.

26.

27.

2,281.55

438.83

1,842.62

1,842.62

MAKE CHECKS PAYABLE TO:
NEVADA DEPARTMENT OF TAXATION

Sales/Use Tax Return
TXR-01.01
Revised 05-28-06

COMBINED SALES AND USE TAX RETURN

This return is for use by sellers of tangible property. If you are not a seller or no longer sell, please notify the Department of Taxation.

MAIL ORIGINAL TO: STATE OF NEVADA - SALES/USE
PO Box 52609
PHOENIX, AZ 85072-2609

For Department Use Only

LUXURY HOLDINGS LV LLC
601 S RANCHO DR STE D32
LAS VEGAS, NV 89106

Return for month Ending 9/30/2014
Due on or before 10/31/2014
Date paid 10/24/2014

If the name or address shown is incorrect, if the ownership or business location has changed, or if you are out of business, notify a Nevada Department of Taxation District Office immediately.

IF POSTMARKED AFTER DUE DATE, PENALTY AND INTEREST WILL APPLY

A RETURN MUST BE FILED EVEN IF NO TAX LIABILITY EXISTS

SALES TAX

USE TAX

ENTER AMOUNT IN COUNTY OF SALES/USE (OR COUNTY OF DELIVERY)	SALES TAX					USE TAX		
	TOTAL SALES	EXEMPT SALES	TAXABLE SALES	TAX RATE	CALCULATED TAX	AMOUNT SUBJECT TO USE TAX	TAX RATE	CALCULATED TAX
TAX CALCULATION FORMULA	COLUMN A	- COLUMN B	= COLUMN C	X COLUMN D	= COLUMN E	COLUMN F	X COLUMN G	= COLUMN H
01 CHURCHILL			0.00	7.600%	0.00		7.600%	0.00
02 CLARK	50,065.51	28,855.00	21,210.51	8.100%	1,718.05	0.00	8.100%	0.00
03 DOUGLAS			0.00	7.100%	0.00		7.100%	0.00
04 ELKO			0.00	6.850%	0.00		6.850%	0.00
05 ESMEVELDA			0.00	6.850%	0.00		6.850%	0.00
06 EUREKA			0.00	6.850%	0.00		6.850%	0.00
07 HUMBOLDT			0.00	6.850%	0.00		6.850%	0.00
08 LANDER			0.00	7.100%	0.00		7.100%	0.00
09 LINCOLN			0.00	7.100%	0.00		7.100%	0.00
10 LYON			0.00	7.100%	0.00		7.100%	0.00
11 MINERAL			0.00	6.850%	0.00		6.850%	0.00
12 NYE			0.00	7.100%	0.00		7.100%	0.00
13 CARSON CITY			0.00	7.475%	0.00		7.475%	0.00
14 PERSHING			0.00	7.100%	0.00		7.100%	0.00
15 STOREY			0.00	7.600%	0.00		7.600%	0.00
16 WASHOE			0.00	7.725%	0.00		7.725%	0.00
17 WHITE PINE			0.00	7.725%	0.00		7.725%	0.00
TOTALS	50,065.51	28,855.00	21,210.51			0.00		

18. Total calculated sales (18a) and use (18b) tax Sum of Column E

19. Enter collection allowance for timely filing (Line 18a x 0.25%)

20. Net sales tax (Line 18a - Line 19)

18a.	1,718.05
19.	4.30
20.	1,713.75

Sum of Column H 18b. 0.00

Collection allowance is for sales tax only. There is no collection allowance for use tax.

I HEREBY CERTIFY THAT THIS RETURN INCLUDING ANY ACCOMPANYING SCHEDULE AND STATEMENTS HAS BEEN EXAMINED BY ME AND TO THE BEST OF MY KNOWLEDGE AND BELIEF IS A TRUE, CORRECT AND COMPLETE RETURN.

RETURN MUST BE SIGNED

Mark Sherman

SIGNATURE OF TAXPAYER OR AUTHORIZED AGENT

CPA 702-645-6318

TITLE

PHONE NUMBER
(WITH AREA CODE)

FEDERAL TAX ID NUMBER (EIN OR SSN)

DATE

10/24/2014

21. Net sales and use tax (line 20 + line 18b)	21.	1,713.75
22. Penalty (line 21 x 10%)	22.	
23. Interest (line 21 x 1% of months past due)	23.	
24. Plus liabilities established by the department	24.	
25. Less credit(s) approved by the department	25.	
26. Total amount due and payable	26.	1,713.75
27. Total amount remitted with return	27.	1,713.75

MAKE CHECKS PAYABLE TO:
NEVADA DEPARTMENT OF TAXATION

Sales/Use Tax Return
TXR-01.01
Revised 09-29-06

COMBINED SALES AND USE TAX RETURN

This return is for use by sellers of tangible property. If you are not a seller or no longer sell, please notify the Department of Taxation.

MAIL ORIGINAL TO: STATE OF NEVADA - SALES/USE
PO Box 52609
PHOENIX, AZ 85072-2609

For Department Use Only

LUXURY HOLDINGS LV LLC
601 S RANCHO DR STE D32
LAS VEGAS, NV 89106

Return for month Ending 10/31/2014
Due on or before 11/30/2014
Date paid 11/18/2014

If the name or address shown is incorrect, if the ownership or business location has changed, or if you are out of business, notify a Nevada Department of Taxation District Office immediately.

IF POSTMARKED AFTER DUE DATE, PENALTY AND INTEREST WILL APPLY

A RETURN MUST BE FILED EVEN IF NO TAX LIABILITY EXISTS

SALES TAX

USE TAX

ENTER AMOUNT IN COUNTY OF SALES/USE (OR COUNTY OF DELIVERY)	TOTAL SALES	EXEMPT SALES	TAXABLE SALES	TAX RATE	CALCULATED TAX	AMOUNT SUBJECT TO USE TAX	TAX RATE	CALCULATED TAX
TAX CALCULATION FORMULA	COLUMN A	- COLUMN B	= COLUMN C	X COLUMN D	= COLUMN E	COLUMN F	X COLUMN G	= COLUMN H
01 CHURCHILL			0.00	7.600%	0.00		7.600%	0.00
02 CLARK	49,965.13	3,208.00	46,757.13	8.100%	3,787.33	0.00	8.100%	0.00
03 DOUGLAS			0.00	7.100%	0.00		7.100%	0.00
04 ELKO			0.00	6.850%	0.00		6.850%	0.00
05 ESMEVELDA			0.00	6.850%	0.00		6.850%	0.00
06 EUREKA			0.00	6.850%	0.00		6.850%	0.00
07 HUMBOLDT			0.00	6.850%	0.00		6.850%	0.00
08 LANDER			0.00	7.100%	0.00		7.100%	0.00
09 LINCOLN			0.00	7.100%	0.00		7.100%	0.00
10 LYON			0.00	7.100%	0.00		7.100%	0.00
11 MINERAL			0.00	6.850%	0.00		6.850%	0.00
12 NYE			0.00	7.100%	0.00		7.100%	0.00
13 CARSON CITY			0.00	7.475%	0.00		7.475%	0.00
14 PERSHING			0.00	7.100%	0.00		7.100%	0.00
15 STOREY			0.00	7.600%	0.00		7.600%	0.00
16 WASHOE			0.00	7.725%	0.00		7.725%	0.00
17 WHITE PINE			0.00	7.725%	0.00		7.725%	0.00
TOTALS	49,965.13	3,208.00	46,757.13			0.00		

18. Total calculated sales (18a) and use (18b) tax

Sum of Column E

18a. 3,787.33

Sum of Column H

18b. 0.00

19. Enter collection allowance for timely filing (Line 18a x 0.25%)

19. 9.47

Collection allowance is for sales tax only. There is no collection allowance for use tax.

20. Net sales tax (Line 18a - Line 19)

20. 3,777.86

I HEREBY CERTIFY THAT THIS RETURN INCLUDING ANY ACCOMPANYING SCHEDULE AND STATEMENTS HAS BEEN EXAMINED BY ME AND TO THE BEST OF MY KNOWLEDGE AND BELIEF IS A TRUE, CORRECT AND COMPLETE RETURN.

RETURN MUST BE SIGNED

Mark Steiman

SIGNATURE OF TAXPAYER OR AUTHORIZED AGENT

CPA

702-645-6318

TITLE

PHONE NUMBER
(WITH AREA CODE)

FEDERAL TAX ID NUMBER (EIN OR SSN)

DATE

11/18/2014

MAKE CHECKS PAYABLE TO:
NEVADA DEPARTMENT OF TAXATION

Sales/Use Tax Return
TXR-01.01
Revised 09-29-06

COMBINED SALES AND USE TAX RETURN

This return is for use by sellers of tangible property. If you are not a seller or no longer sell, please notify the Department of Taxation.

MAIL ORIGINAL TO: STATE OF NEVADA - SALES/USE
PO Box 52809
PHOENIX, AZ 85072-2609

For Department Use Only

LUXURY HOLDINGS LV LLC
601 S RANCHO DR STE D32
LAS VEGAS, NV 89106

Return for month Ending 11/30/2014
Due on or before 12/31/2014
Date paid 12/30/2014

If the name or address shown is incorrect, if the ownership or business location has changed, or if you are out of business, notify a Nevada Department of Taxation District Office immediately.

IF POSTMARKED AFTER DUE DATE, PENALTY
AND INTEREST WILL APPLY

A RETURN MUST BE FILED EVEN IF NO TAX LIABILITY EXISTS

SALES TAX**USE TAX**

ENTER AMOUNT IN COUNTY OF SALES/USE (OR COUNTY OF DELIVERY)	SALES TAX					USE TAX		
	TOTAL SALES	EXEMPT SALES	TAXABLE SALES	TAX RATE	CALCULATED TAX	AMOUNT SUBJECT TO USE TAX	TAX RATE	CALCULATED TAX
TAX CALCULATION FORMULA	COLUMN A	- COLUMN B	= COLUMN C	X COLUMN D	= COLUMN E	COLUMN F	X COLUMN G	= COLUMN H
01 CHURCHILL			0.00	7.600%	0.00		7.600%	0.00
02 CLARK	71,345.06	25,229.00	46,116.06	8.100%	3,735.40	0.00	8.100%	0.00
03 DOUGLAS			0.00	7.100%	0.00		7.100%	0.00
04 ELKO			0.00	6.850%	0.00		6.850%	0.00
05 ESMERELDA			0.00	6.850%	0.00		6.850%	0.00
06 EUREKA			0.00	6.850%	0.00		6.850%	0.00
07 HUMBOLDT			0.00	6.850%	0.00		6.850%	0.00
08 LANDER			0.00	7.100%	0.00		7.100%	0.00
09 LINCOLN			0.00	7.100%	0.00		7.100%	0.00
10 LYON			0.00	7.100%	0.00		7.100%	0.00
11 MINERAL			0.00	6.850%	0.00		6.850%	0.00
12 NYE			0.00	7.100%	0.00		7.100%	0.00
13 CARSON CITY			0.00	7.475%	0.00		7.475%	0.00
14 PERSHING			0.00	7.100%	0.00		7.100%	0.00
15 STOREY			0.00	7.600%	0.00		7.600%	0.00
16 WASHOE			0.00	7.725%	0.00		7.725%	0.00
17 WHITE PINE			0.00	7.725%	0.00		7.725%	0.00
TOTALS	71,345.06	25,229.00	46,116.06			0.00		

18. Total calculated sales (18a) and use (18b) tax: Sum of Column E

19. Enter collection allowance for timely filing (Line 18a x 0.25%)

20. Net sales tax (Line 18a - Line 19)

18a. 3,735.40

19. 9.34

20. 3,726.06

Sum of Column H 18b. 0.00

Collection allowance is for sales tax only. There is no collection allowance for use tax.

I HEREBY CERTIFY THAT THIS RETURN INCLUDING ANY ACCOMPANYING SCHEDULE AND STATEMENTS HAS BEEN EXAMINED BY ME AND TO THE BEST OF MY KNOWLEDGE AND BELIEF IS A TRUE, CORRECT AND COMPLETE RETURN.

RETURN MUST BE SIGNED

Mark Steiner

SIGNATURE OF TAXPAYER OR AUTHORIZED AGENT

CPA 702-645-6318

TITLE PHONE NUMBER
(WITH AREA CODE)

FEDERAL TAX ID NUMBER (EIN OR SSN) 12/30/2014
DATE

21. Net sales and use tax (line 20 + line 18b)

22. Penalty (line 21 x 10%)

23. Interest (line 21 x 1% of months past due)

24. Plus liabilities established by the department

25. Less credit(s) approved by the department

26. Total amount due and payable

27. Total amount remitted with return

21. 3,726.06

22. 372.606

23. 37.2606

24. 372.606

25. 372.606

26. 3,726.06

27. 3,726.06

MAKE CHECKS PAYABLE TO:
NEVADA DEPARTMENT OF TAXATION

Sales/Use Tax Return
TXR-01.01
Revised 09-29-06

NEVADA DEPARTMENT OF TAXATION

TID No:001-TX-

1015629628-901

COMBINED SALES AND USE TAX RETURN

This return is for use by sellers of tangible property. If you are not a seller or no longer sell, please notify the Department of Taxation.

MAIL ORIGINAL TO: STATE OF NEVADA - SALES/USE
PO Box 52609
PHOENIX, AZ 85072-2609

For Department Use Only

LUXURY HOLDINGS LV LLC
601 S RANCHO DR STE D32
LAS VEGAS, NV 89106

Return for month Ending 12/31/2014
Due on or before 2/2/2015
Date paid 1/15/2015

If the name or address shown is incorrect, if the ownership or business location has changed, or if you are out of business, notify a Nevada Department of Taxation District Office immediately.

IF POSTMARKED AFTER DUE DATE, PENALTY AND INTEREST WILL APPLY

A RETURN MUST BE FILED EVEN IF NO TAX LIABILITY EXISTS

SALES TAX

USE TAX

ENTER AMOUNT IN COUNTY OF SALES/USE (OR COUNTY OF DELIVERY)		TOTAL SALES	EXEMPT SALES	TAXABLE SALES	TAX RATE	CALCULATED TAX	AMOUNT SUBJECT TO USE TAX	TAX RATE	CALCULATED TAX
TAX CALCULATION FORMULA	COLUMN A	- COLUMN B	= COLUMN C	X COLUMN D	= COLUMN E		COLUMN F	X COLUMN G	= COLUMN H
01 CHURCHILL			0.00	7.600%	0.00			7.600%	0.00
02 CLARK	163,967.51	36,640.00	127,327.51	8.100%	10,313.53		0.00	8.100%	0.00
03 DOUGLAS			0.00	7.100%	0.00			7.100%	0.00
04 ELKO			0.00	6.850%	0.00			6.850%	0.00
05 ESMEVELDA			0.00	6.850%	0.00			6.850%	0.00
06 EUREKA			0.00	6.850%	0.00			6.850%	0.00
07 HUMBOLDT			0.00	6.850%	0.00			6.850%	0.00
08 LANDER			0.00	7.100%	0.00			7.100%	0.00
09 LINCOLN			0.00	7.100%	0.00			7.100%	0.00
10 LYON			0.00	7.100%	0.00			7.100%	0.00
11 MINERAL			0.00	6.850%	0.00			6.850%	0.00
12 NYE			0.00	7.100%	0.00			7.100%	0.00
13 CARSON CITY			0.00	7.475%	0.00			7.475%	0.00
14 PERSHING			0.00	7.100%	0.00			7.100%	0.00
15 STOREY			0.00	7.600%	0.00			7.600%	0.00
16 WASHOE			0.00	7.725%	0.00			7.725%	0.00
17 WHITE PINE			0.00	7.725%	0.00			7.725%	0.00
TOTALS	163,967.51	36,640.00	127,327.51				0.00		

18. Total calculated sales (18a) and use (18b) tax: Sum of Column E
19. Enter collection allowance for timely filing (Line 18a x 0.25%)
20. Net sales tax (Line 18a - Line 19)

18a. 10,313.53
19. 25.78
20. 10,287.75

Sum of Column H 18b. 0.00

Collection allowance is for sales tax only. There is no collection allowance for use tax.

I HEREBY CERTIFY THAT THIS RETURN INCLUDING ANY ACCOMPANYING SCHEDULE AND STATEMENTS HAS BEEN EXAMINED BY ME AND TO THE BEST OF MY KNOWLEDGE AND BELIEF IS A TRUE, CORRECT AND COMPLETE RETURN.

RETURN MUST BE SIGNED

Mark Shuman

SIGNATURE OF TAXPAYER OR AUTHORIZED AGENT

CPA 702-645-6318

TITLE PHONE NUMBER (WITH AREA CODE)

FEDERAL TAX ID NUMBER (EIN OR SSN) 1/15/2015 DATE

21. Net sales and use tax (line 20 + line 18b) 21. 10,287.75
22. Penalty (line 21 x 10%) 22.
23. Interest (line 21 x 1% of months past due) 23.
24. Plus liabilities established by the department 24.
25. Less credit(s) approved by the department 25.
26. Total amount due and payable 26. 10,287.75
27. Total amount remitted with return 27. 10,287.75

MAKE CHECKS PAYABLE TO:
NEVADA DEPARTMENT OF TAXATION

Sales/Use Tax Return
TXR-01.01
Revised 09-29-06

REYNOLDS000355

0811

EXHIBIT 24

-DIAMANT JEWELERS-

DATE	SALES	REPAIRS	TOTAL
10/18	108.10	.10-	118.10
0/19	666.45	45-	711.45
0/20	368.54	39-	407.54
0/21	36.22	145-	181.22
0/22		20-	20-
0/23	16.22	155-	171.22
1/24	16.22	27-	43.22
1/25	245-	5-	250-
0/26	316.20	155-	471.20
1/28	1236.28	220-	1456.28
0/29	258.10		258.10
0/30	16.32	143-	159.32
1/31	601.04	283-	884.04
1/1	38.08	211-	249.08
			5380.77

DATE	SALES	REPAIRS	TOTAL
11/2/2014	\$400.71	\$70.00	\$470.71
11/3/2014	\$185.00	\$30.00	\$215.00
11/4/2014	\$2,134.43	\$50.00	\$2,184.43
11/5/2014	\$45.41	\$215.00	\$260.41
11/6/2014	\$176.46	-----	\$176.46
11/7/2014	\$313.50	\$135.00	\$448.00
11/8/2014	-----	\$216.00	\$216.00
11/9/2014	-----	-----	-----
11/10/2014	\$630.00	\$641.00	\$1,271.00
11/11/2014	\$548.65	\$42.00	\$590.65
11/12/2014	\$450.00	\$18.00	\$468.00
11/13/2014	-----	-----	-----
11/14/2014	\$305.00	-----	\$305.00
11/15/2014	\$604.20	\$10.00	\$614.20
11/16/2014	\$3,820.00	\$150.00	\$3,970.00
11/17/2014	\$189.18	\$68.00	\$257.18
11/18/2014	-----	\$260.00	\$260.00
11/19/2014	\$16.20	\$30.00	\$46.20
11/20/2014	\$116.00	\$120.00	\$236.00
11/21/2014	\$50.81	-----	\$50.81
11/22/2014	\$1,200	\$226.00	\$1,426.00
11/23/2014	\$298.40	\$125.00	\$423.90
11/24/2014	\$32.43	\$85.00	\$117.43
11/25/2014	\$875.00	\$100.00	\$975.00
11/26/2014	\$2,120.03	\$15.00	\$2,135.03
11/27/2014	-----	-----	-----
11/28/2014	\$364.15	\$325.00	\$689.15
11/29/2104	\$72.02	\$410.00	\$482.02
11/30/2104	\$511.62	\$325.00	\$836.62
<u>TOTAL</u>	<u>\$15,459.00</u>	<u>\$3,666.00</u>	<u>\$19,125.20</u>

DECEMBER SALES

DIAMANTE JEWELERS

DATE	SALES	REPAIRS	TOTAL
12/1/2014	\$20.00		\$20.00
12/2/2014	\$1,300.00	\$83.00	\$1,383.00
12/3/2014	\$43.24	\$75.00	\$118.24
12/4/2014	\$242.69	\$490.00	\$732.69
12/5/2014	\$164.43	\$420.00	\$584.43
12/6/2014	\$340.39	\$544.00	\$884.39
12/7/2014	\$4,865	\$115	\$4,980.00
12/8/2014	\$87.03	\$325.00	\$412.00
12/9/2014	\$520.00	\$25.00	\$545.00
12/10/2014	\$1,245.00	\$228.00	\$1,473.00
12/11/2014	\$497.80	\$870.00	\$1,367.80
12/12/2014	\$1,263.60	-	\$1,263.60
12/12/2014	\$972.60	\$419.00	\$1,391.60
12/14/2014	\$916.60	\$365.00	\$1,281.60
12/15/2014	\$2,568.64	\$255.00	\$2,823.64
12/16/2014	\$1,175.00	\$180.00	\$1,355.00
12/17/2014	\$535.00	\$70.00	\$605.00
12/18/2014	\$8,050.42	\$68.00	\$8,118.42
12/19/2014	\$3,067.99	\$135.00	\$3,202.99
12/20/2014	\$10,565.98	\$85.00	\$10,650.98
12/21/2014	\$3,566.62	\$300.00	\$3,866.62
12/22/2014	1,375.73	\$20.00	\$1,395.73
12/23/2014	\$3,288.33	\$585.00	\$3,873.33
12/24/2014	\$3,833.62		\$3,833.62
12/25/2014		STORE CLOSED FOR CHRISTMAS	
12/26/2014	\$1,836.57	\$1,353.00	\$3,189.57
12/27/2014	\$1,021.83	\$255.00	\$1,276.83
12/28/2014	\$446.62	\$68.00	\$514.62
12/29/2014	\$1,320.00	\$610.00	\$1,930.00
12/30/2014	\$1,653.70	\$130.00	\$1,783.70
12/31/2014	-	-	-
	\$56,784.43	\$8,073	\$64,857.40



64,857.40
 50,000.00

 14,857.40
 x .10%

 \$1,485.74

EXHIBIT 4



Marquis Aurbach Coffing
Terry A. Moore, Esq.
Nevada Bar No. 7831
Christian T. Balducci, Esq.
Nevada Bar No. 12688
10001 Park Run Drive
Las Vegas, Nevada 89145
Telephone: (702) 382-0711
Facsimile: (702) 382-5816
tmoore@maclaw.com
cbalducci@maclaw.com
Attorneys for Defendants

DISTRICT COURT
CLARK COUNTY, NEVADA

ROBERT G. REYNOLDS, an individual,
DIAMANTI FINE JEWELERS, LLC, a Nevada
limited liability company,

Plaintiffs,

vs.

RAFFI TUFENKJIAN, an individual, and
LUXURY HOLDINGS LV, LLC, a Nevada
Limited Liability Company, DOES 1-10, and
ROE CORPORATIONS 1-10 inclusive,

Defendants.

Case No.: A-17-753532-B
Dept. No.: XIII

APPENDIX IN SUPPORT OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Defendants Raffi Tufenkjian and Luxury Holdings LV, LLC (collectively "Defendants"),
by and through the law firm of Marquis Aurbach Coffing, hereby submits their Appendix in
support of their Motion for Summary Judgment as follows:

///

///

///

///

Exs.	Description	Bates No.
A	Deposition Transcript of Robert Reynolds.	MSJ APPX 001-078
B	Declaration of Raffi Tufenkjian.	MSJ APPX 079-084
C	Offer to Purchase and Sale of Business Assets.	MSJ APPX 085-091
D	Counter Offer.	MSJ APPX 092-093
E	Secretary of State Print-Out for Diamanti Fine Jewelers LLC.	MSJ APPX 094-096
F	Certificate of Authority.	MSJ APPX 097-099
G	Declaration of Aldo Aguirre.	MSJ APPX 100-102
H	Declaration of David Tufenkjian.	MSJ APPX 103-106
I	Closing Agreement.	MSJ APPX 107-113
J	Bill of Sale of Inventory.	MSJ APPX 114-115
K	Other Closing Documents.	MSJ APPX 116-126
L	Lease and Guaranty Assignment at Recital.	MSJ APPX 127-130
M	Complaint.	MSJ APPX 131-145
N	Marketing Brochure.	MSJ APPX 146-191
O	FF&E Bill of Sale.	MSJ APPX 192-196
P	Christian T. Balducci, Esq.	MSJ APPX 197-200
Q	Email Containing Brochure.	MSJ APPX 201-204
R	Certificate of Custodian of Records from Accelerated Escrow.	MSJ APPX 205-207
S	Certificate of Custodian of Records from Sunbelt Business Brokers.	MSJ APPX 208-210

Dated this 10th day of August, 2018.

MARQUIS AURBACH COFFING

By /s/ Christian T. Balducci

Terry A. Moore, Esq.
Nevada Bar No. 7831
Christian T. Balducci, Esq.
Nevada Bar No. 12688
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **APPENDIX IN SUPPORT OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT** was submitted electronically for filing and/or service with the Eighth Judicial District Court on the 10th day of August, 2018. Electronic service of the foregoing document shall be made in accordance with the E-Service List as follows:¹

Chasey Law Offices	
Contact	Email
Peter Chasey	peter@chaseylaw.com
Shannon	shannon@chaseylaw.com

/s/ Cheryl Becnel

An employee of Marquis Aurbach Coffing

¹ Pursuant to EDCR 8.05(a), each party who submits an E-Filed document through the E-Filing System consents to electronic service in accordance with NRCP 5(b)(2)(D).

Exhibit A

DISTRICT COURT
CLARK COUNTY, NEVADA

_____)
ROBERT G. REYNOLDS, an individual;)
DIAMANTI FINE JEWELERS, LLC, a)
Nevada limited liability company,)
)
Plaintiff,)
)
vs.) No. A-17-753532-B
)
RAFFI TUFENKJIAN, an individual,)
and LUXURY HOLDINGS LV, LLC, a)
Nevada Limited Liability Company;)
GREAT WASH PARK, LLC, a Nevada)
Limited Liability Company d/b/a)
TIVOLI VILLAGE; DOES 1-10, and ROE)
CORPORATIONS 1-10 inclusive,)
)
Defendants.)
_____)

DEPOSITION OF ROBERT G. REYNOLDS
Las Vegas, Nevada
Thursday, April 19, 2018
Volume I

Reported by:
BARBARA R. JUSTL
CCR No. 878
Job No. 2884402

PAGES 1 - 171

Page 1

1 to me that you're familiar with the concept that you are
2 not a corporation. Would that be a fair statement?
3 A Yes. Yes.
4 Q On the theater, did you acquire that interest in
5 your individual name or in another PTY or other corporate
6 form?
7 A I don't remember.
8 Q It was just too long ago perhaps?
9 A Yes, and it would have -- it was a small minor
10 thing. And again, my bookkeeper took care of it and
11 they -- in doing business down there, like I say, I
12 wouldn't get into a legal argument with anybody because
13 number one thing, the language is different; the laws are
14 different. They have English things they handle; they
15 have American things they do.
16 And I just -- I took the easy way out and I went
17 with the professional financial people to speak and act
18 on my behalf.
19 Q Organize the corporate form and structure?
20 A All of that.
21 Q Prior to the business you're in now, have you ever
22 worked or had experience in the jewelry business?
23 A I bought a ring there one time.
24 Q Okay. That's what you call when I ask a bad
25 question, I get a smart answer.

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1 Prior to the company you're in now, have you ever
2 been employed in the jewelry business?
3 A No.
4 Q Have you ever worked in the diamond trade?
5 A No.
6 Q Have you ever worked in any of the jewelry
7 industry that's prevalent from London to Switzerland?
8 A No.
9 Q How about in South Africa? Have you ever
10 specifically worked in the diamond or loose jewelry
11 business?
12 A No.
13 Q What inspired you to get into the jewelry
14 business?
15 A Well, I'll tell you. A scam put on by your
16 client, and probably the biggest scam that I've ever been
17 involved in, more lies than I've ever been told before.
18 I can go through the -- since you brought it up and it's
19 your broad question, I can go through the whole scenario
20 of buying the business from Raffi and everything that he
21 told me was a bold-faced lie.
22 Q I'm going to actually want you to do that. I've
23 just got a couple --
24 A And I can prove that to you, not by my numbers and
25 not by things that I've done, but by numbers that he has

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1 produced. And I won't show you what he done wrong.
2 You'll be able to -- I'll just point it out to you what
3 he's done wrong, and you'll know what a fake and phony it
4 was.
5 Now, the reason that I got into the jewelry
6 business was because it was a good financial investment,
7 according to Raffi. But once I bought it, it turned out
8 to be the biggest lie in Las Vegas. He said I would make
9 \$800,000 a year. I've been there three years and haven't
10 made \$800,000. He said I'd make \$222,000 a year profit.
11 I've been there three years and I haven't made that. He
12 told me that he wasn't going to have another business
13 within 50 miles of that. That was a lie.
14 Q All right. I'm actually going to want you to go
15 through --
16 A The only thing he told me was the truth was one
17 time I asked him for the -- his tax records, and he
18 said -- he said, "I don't have the tax records," but he
19 said, "If you go to the business summary, and all of
20 those numbers in the business summary are factual."
21 But he says, "I have a holding company and the
22 companies I own put all of their numbers together, and
23 you wouldn't be able to make sense out of it. So you
24 just depend upon the numbers that's in the business
25 summary and that's it."

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1 Q Did you ever have -- two quick questions on
2 family. Do you have any children?
3 A Yes.
4 Q How many?
5 A Two.
6 Q My understanding is one is no longer with us, for
7 which I express my condolences.
8 A They're both dead.
9 Q Oh, they both are. Okay. Again, I express my
10 condolences on that.
11 What industries did both of them pursue once they
12 reached an age that they could go and pursue a career?
13 A The one boy was an attorney here in Las Vegas.
14 Then the other boy was a material manager for
15 construction.
16 Q Did you ever have a child study in the jewelry
17 business?
18 A Nope.
19 Q How about a stepson or stepdaughter?
20 A No.
21 Q Your son that was the attorney in Las Vegas, what
22 was his name?
23 A Michael.
24 Q Reynolds, I assume?
25 A Michael A. Reynolds. Alan.

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10 (Pages 34 - 37)

1 Q Do you know what law firm he worked at?
2 A No, I'd have to get his card. I've got his card
3 at home, but I don't remember.
4 Q I can do all that myself. In terms of your son
5 that was the materials manager, did he live here in Las
6 Vegas or somewhere else?
7 A He's dead.
8 Q Well, good point. He would not be --
9 A He lives here. He's out at Bunker's Hill, both of
10 them.
11 Q How about when he was alive, where did he live,
12 the material guy?
13 A Oh, all over.
14 Q How about your wife? Did she ever have any
15 interest in the jewelry industry?
16 A In the retail business, yes. Jewelry, no.
17 Q Are you familiar with a company called Reyco,
18 LLC?
19 A Yes, I owned it.
20 Q Okay. What business is Reyco, LLC engaged in?
21 A Jewelry business right now.
22 Q At a different location or Diamanti?
23 A They own Diamanti. And there again, probably --
24 I'll volunteer this. That I went to a CPA here in Las
25 Vegas. I've been outside the country for 30 years. When

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1 I left here, the way that you formed a company was an
2 incorporation, but I come back, they don't have
3 incorporation anymore.
4 So I went to the CPA and I told him that I was
5 going to buy this business, would he help me set up the
6 companies that I needed to be within all of the laws and
7 all of the tax codes and everything. And he recommended
8 the statue of our company.
9 Q All right. So Reyco, LLC is the owner. I guess
10 do you know, do you get a K-1 or is it just a
11 pass-through?
12 A No, I get K-1s.
13 Q From Reyco?
14 A Yes.
15 Q How about from Diamanti Fine Jewelers?
16 A Yes.
17 Q So you get K-1s from both those LLCs?
18 A Yes.
19 Q Since you're familiar with the company called
20 Diamanti --
21 A Well, I say yes, but I don't get any because they
22 don't make any.
23 Q Understood. Are you familiar with a company -- do
24 you want a break?
25 MR. CHASEY: Yeah, can we?

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1 MR. BALDUCCI: You're requesting it?
2 MR. CHASEY: Yes.
3 MR. BALDUCCI: That's fine.
4 (Recess.)
5 MR. BALDUCCI: On the record.
6 BY MR. BALDUCCI:
7 Q Mr. Reynolds, what did you guys talk about
8 outside?
9 MR. CHASEY: Yes.
10 THE WITNESS: To not talk so much and be more
11 direct.
12 BY MR. BALDUCCI:
13 Q I think you're doing a good job.
14 MR. CHASEY: I knew about it. That's a recent
15 development. I think it makes sense.
16 MR. BALDUCCI: It kind of does because it's true.
17 (Discussion off the record.)
18 BY MR. BALDUCCI:
19 Q I'm just taking a few notes. All right.
20 Prior to making an offer to purchase the jewelry
21 store located in Tivoli, had you ever spoken with an
22 individual named Raffi Tufenkjian?
23 A Before I made an offer?
24 Q Yes, sir.
25 A Did I talk to a guy by the name of Raffi? Yes.

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1 Q On how many occasions?
2 A I wouldn't have any idea.
3 Q Do you --
4 A I mean not hundreds of times, but --
5 Q One or two?
6 A Certainly more than three or four.
7 Q And what would those conversations have been with
8 respect to?
9 A The business.
10 Q So prior to making an offer, you would have only
11 spoken to Mr. Tufenkjian about the business itself?
12 A Well, it would be things that pertained to the
13 business. I suppose we probably talked about our kids or
14 said something about it, but -- I don't know -- I don't
15 understand the -- what you're fishing for.
16 Q Just trying to figure out, you know, were you guys
17 best friends that would speak on the phone every night
18 and watch soap operas together, or when you were in there
19 prior to closing the business, was it just --
20 A He was a guy that -- he's very personable, and he
21 was easy to like, and he was easy to trust, and that was
22 one of the biggest mistakes I ever made in my life was
23 trusting him.
24 Q You said you purchased a ring there before buying
25 the business?

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<p>1 I'd like you to turn to what's marked in the lower 2 right-hand corner DEFTS-801. I just want to be clear 3 with respect to this summary. I asked it before and I'll 4 ask it again.</p> <p>5 This is the business summary you reviewed and, 6 based on what you said this morning, you relied on and 7 are basing some of your claims on; is that correct?</p> <p>8 A Correct.</p> <p>9 Q And if you could, I'd like to focus on the second 10 paragraph on this page beginning at the second sentence. 11 And I'll read it. You can tell me if I'm reading it 12 incorrect.</p> <p>13 According to this sentence it says in this 14 business summary, "During the due diligence process, it 15 is the responsibility of the Buyer, with the aid of an 16 accountant and/or attorney, if necessary, to 17 independently verify all representations which have been 18 made by the Seller, particularly as they relate to the 19 adjustments made to profit and loss statements."</p> <p>20 Did I read that sentence correctly?</p> <p>21 A Yes.</p> <p>22 Q When you read that, what does that sentence mean 23 to you?</p> <p>24 MR. CHASEY: Objection, vague.</p> <p>25 THE WITNESS: Yeah, I think that -- how you gonna</p> <p style="text-align: right;">Page 106</p>	<p>1 accurate based upon the information that Raffi gave 2 him.</p> <p>3 Q And you'd agree with me that this particular 4 sentence is telling you that during due diligence, it's 5 your responsibility, with the aid of your accountant and 6 attorney, to verify all the information in the business 7 summary?</p> <p>8 A Yes, it says that, but you can't get them.</p> <p>9 Q Was it concerning to you that you couldn't get 10 these documents?</p> <p>11 A Sorry?</p> <p>12 Q Was it concerning to you that they wouldn't turn 13 these documents to you?</p> <p>14 A A little.</p> <p>15 Q And wouldn't it be fair to say did you have any 16 fear or concerns about the particular transaction then?</p> <p>17 A I would -- I would have if I knew that I was 18 looking at a double-edged sword here where I was being 19 told by one to get it and told by the other one that you 20 can't have it. If I had really understood that, that 21 that's what the people wanted, I'd have just told them to 22 stuff it.</p> <p>23 Q So -- you said "that's what the people wanted." 24 I'm confused by that. What do you mean by that?</p> <p>25 A Well, they said no. They said no or they said</p> <p style="text-align: right;">Page 108</p>
<p>1 do that?</p> <p>2 BY MR. BALDUCCI:</p> <p>3 Q Independently verify profit and loss and things 4 like that?</p> <p>5 A Yeah, when you -- when I asked for papers and I 6 don't get them.</p> <p>7 Q When you asked for papers, how would you do that? 8 Would you do that in writing with an email?</p> <p>9 A No, I'd just ask him. I went to -- now I went 10 to -- I went to Alan Horwitz. At that time it was early 11 in the game, and they got a big long do in here that you 12 can't talk to anybody unless you go through Alan Horwitz.</p> <p>13 So I would drag it by him and he would normally 14 say, "Well, talk to Raffi," or "Do whatever you want to 15 do." And he kind of relaxed it a little bit as we went 16 along.</p> <p>17 But when I asked Raffi for the tax returns, then 18 he told me that he had a holding company and all of 19 these -- all of his numbers went into the holding 20 company, and I probably wouldn't be able to make sense of 21 it anyhow, so go to the business summary. All of the 22 numbers in the business summary are correct.</p> <p>23 And he told me that at least three times, as well 24 as Alan Horwitz verbally told me that all the numbers in 25 the business summary are accurate. But they're all</p> <p style="text-align: right;">Page 107</p>	<p>1 yes. The people that wanted are saying here that you've 2 got to have the aid of an accountant or attorney if 3 necessary to independently verify all representations 4 which are made by the seller.</p> <p>5 Q Now when you purchased the hotel, didn't you have 6 your bookkeeper go through the books and records of the 7 hotel?</p> <p>8 A Yes. Yes. But they weren't withheld either.</p> <p>9 Q Did you have a bookkeeper assist you in this 10 particular transaction?</p> <p>11 A No.</p> <p>12 Q Is there a reason you didn't but you had in the 13 past?</p> <p>14 A No, because I was satisfied with the numbers.</p> <p>15 Q So we'll proceed forward to here. The second 16 paragraph -- third -- "Readers of this report should 17 understand that statements are not guarantees of value or 18 results."</p> <p>19 Do you agree with me that's what the first 20 sentence of paragraph 3 says?</p> <p>21 A Yes.</p> <p>22 Q And then we go to the fourth paragraph. It says, 23 the brokerage company, Sunbelt brokerage company, 24 "cautions readers not to place undue reliance on any 25 forward-looking statements or projections that may have</p> <p style="text-align: right;">Page 109</p>

1 been used in the analysis of value."
2 Paragraph goes on to read, "It is the
3 responsibility of the Buyer to verify all representations
4 and to make a final purchase decision based on their own
5 independent investigation."
6 Do you agree with me that's what it says?
7 A Yes, I agree with what it says.
8 Q So in summation --
9 A But it also through those papers -- I know what
10 you're trying -- where you're coming from, that you're
11 trying to say that Sunbelt is disclaiming any
12 responsibility to the making of this thing here, and I
13 understand that.
14 But they also say in there that all of these
15 numbers in here are based upon the numbers given them by
16 the seller.
17 Q That I would agree with you.
18 A They wouldn't -- they won't verify that the
19 numbers are right; they just put them in here the way
20 that they gave them to the seller. The seller lied to
21 them. I know that.
22 Q I would agree with you that it does say in here
23 that the documents were provided by seller. But would
24 you agree with me that this document does disclaim all
25 the financial records in here and tells you, the buyer,

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1 to do your own independent verification?
2 A Yes.
3 Q And other than asking for things which you did not
4 receive, did you do any other independent investigation
5 to evaluate the business?
6 A Well, I'm trying to think what you mean by that,
7 any other verifications.
8 Q Yeah. Did you go and speak with the accountants?
9 Did -- so -- let's put it this way. You were asking for
10 things, and based on your testimony, you didn't receive
11 them. Is that fair?
12 A Yes.
13 Q Other than asking for things, did you do anything
14 else? Did you go behind the counter and look at the
15 computer screen and look at sales reports?
16 A No.
17 Q Did you receive any documentations, any documents
18 that you requested during the entire due diligence
19 period?
20 A Did I --
21 Q Because you were asking for things and like, for
22 example, you told me the taxes and you didn't receive
23 them; is that correct?
24 A Right.
25 Q At any point did you ask for something and you got

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1 what you asked for?
2 A Well, I guess so. Because I had a lot of stuff,
3 and I don't know whether I asked for it or whether they
4 gave it to me.
5 Q Let's start that way. What were the things you
6 asked for during the due diligence period?
7 A Well, the things that I asked for was the profit
8 and loss statements, the tax statements, the sales and
9 use forms. And the ones that I didn't get, they told me
10 just to -- just to believe the numbers that's in the
11 business summary.
12 Q And this is the same summary that says that you
13 have to verify everything?
14 A Yes.
15 Q So you said taxes, P&Ls and sales and use and then
16 of those you didn't get to look here. Which of those,
17 taxes, P&L, sales and use, which of those did you get, if
18 any?
19 MR. CHASEY: Objection, vague as to time.
20 BY MR. BALDUCCI:
21 Q Out of the taxes, P&Ls, and sales and use, which,
22 if any of those, did you receive during the due diligence
23 period for the business?
24 A I received the sales reports, yeah, the sales/use
25 report.

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1 Q And did you do anything to independently verify
2 the information on the sales and use reports?
3 A Yeah, I tried. I tried to cross-reference them
4 with the point of sales.
5 Q Was this during due diligence that you're doing
6 this or after?
7 A All during. All during. Before, after, still.
8 Q What did you learn when you reviewed these during
9 the due diligence by comparing the sales and use to the
10 point of sale?
11 A That the numbers are everywhere.
12 Q So during the due diligence period, you understood
13 that the numbers were everywhere?
14 A Yes.
15 Q And did that raise an alarm?
16 A Yes.
17 Q But you decided to proceed forward and close the
18 transaction anyway?
19 A Yes. Because the --
20 Q Why don't we proceed to DEFTS-815 in that
21 particular business summary.
22 MR. CHASEY: 805 you said?
23 MR. BALDUCCI: You know what? I gave you the
24 wrong number.
25 THE WITNESS: 815.

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1 Q Unless you tell me that you do not understand the
2 question, I'm going to assume you understand it.
3 Do you understand?
4 A I can understand what you said.
5 Q Perfect. All right.
6 This is a true and accurate copy of your offer to
7 purchase the jewelry store; is that correct?
8 A Yes.
9 Q And do you see how it says, "Received from
10 Purchaser Robert G. Reynolds or entity to be formed by
11 Purchaser," on paragraph 1?
12 A Yes.
13 Q I just wanted to clarify. The bottom of the page,
14 it's initialed. We can skim through it. They're all
15 initialed, and there's a signature on the last page,
16 DEFTS-239, and that's your signature, correct?
17 A Yes.
18 Q So in initialing this document and signing it, it
19 was your intention that an entity formed by you would own
20 the jewelry store, not you personally?
21 A Would only be what?
22 Q That an entity formed by you would own the jewelry
23 store if there was a closing --
24 A Yes.
25 Q -- and not you personally. You personally would

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1 not own the jewelry store if the transaction closed?
2 A Yes.
3 Q I'd like to turn to the next page, DEFTS-235.
4 A 235?
5 Q I think -- let me see. No, I'm sorry, the next
6 page, 236. My apologies.
7 Paragraph 12, "Inspection of Assets." To
8 summarize it, it basically says you have the right to go
9 in and inspect everything, and that you rely solely upon
10 your personal examination of the business in making this
11 offer and not upon any statements or representations.
12 Would you agree that's generally what that
13 particular paragraph says?
14 MR. CHASEY: Objection, document speaks for
15 itself. Misstates the evidence.
16 THE WITNESS: Well, that's not completely true.
17 BY MR. BALDUCCI:
18 Q Following your making this offer --
19 A I see. I see. I know where you're coming from.
20 I signed the paper, but it's not true that I made my
21 decision --
22 Q Based upon --
23 A -- based upon the broker advice.
24 Q Did you --
25 A I relied solely upon the broker's advice.

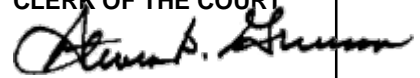
Page 123

1 Q Okay.
2 A The broker and Raffi.
3 Q Okay. So then you believe that this paragraph 12
4 is untrue?
5 A Yes, it's untrue.
6 Q But you initialed and signed this agreement.
7 A I know.
8 Q Following you making this offer, did you ever
9 inspect the equipment, fixtures and stock on hand at the
10 jewelry store?
11 A Well, your definition of inspection and mine
12 probably differ. What is your definition of inspection?
13 Q Well, let's use yours because --
14 A Do you go get an x-ray machine and x-ray
15 everything? Do you go get a --
16 Q Well, I didn't buy the business, so I'd like to go
17 off of your definition. What does inspection mean to
18 you?
19 A Inspection means to me that you look at it.
20 Q So did you ever go down to the store and look at
21 everything after making this offer?
22 A I looked at enough of it that I was satisfied with
23 it.
24 Q Did you look at enough of it prior to making the
25 offer or after?

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1 A I would say both, because if at any time that I
2 had noticed something being wrong, even though I signed
3 the papers, when I noticed something missing or being
4 wrong or questionable, I would call and ask them.
5 And their answer to me generally is go back to the
6 summary. And the summary, if you read the summary and
7 you have, and you've probably read it a dozen times, but
8 all this summary does is tell you in there that they're
9 not responsible for anything.
10 Q That's correct.
11 A What it says in here that all of the numbers in
12 here came from Raffi, from the seller. And all they did
13 was put them together. But they -- they relied upon them
14 enough to put their name on the front of it and tell old
15 Bob here, buy this and you'll make this much money.
16 Q That's the same --
17 A You'll be -- you'll be completely paid back in 23
18 months.
19 Q And that's the same summary that tells you that
20 there are adjusted financials for the business to be
21 operating at maximum profitability that you need to
22 independently verify with accountants and attorneys as is
23 necessary?
24 A Well, there's another paragraph in here that tells
25 you that you can do that if there's no increase in

Page 125



NOTC

PETER L. CHASEY, ESQ.

Nevada Bar No. 007650

CHASEY LAW OFFICES

3295 N. Fort Apache Road, Suite 110

Las Vegas, Nevada 89129

Tel: (702) 233-0393 Fax: (702) 233-2107

email: peter@chaseylaw.com

Attorney for Plaintiffs

**DISTRICT COURT
CLARK COUNTY, NEVADA**

ROBERT G. REYNOLDS, an individual, and
DIAMANTI FINE JEWELERS, LLC, a Nevada
Limited Liability Company,

Plaintiff,

vs.

RAFFI TUFENKJIAN, an individual, and LUXURY
HOLDINGS LV, LLC, a Nevada Limited Liability
Company, DOES 1-10, and ROE CORPORATIONS
1-10 inclusive,

Defendants.

) CASE NO.: A-17-753532-C

) DEPT NO.: XIII

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NOTICE OF ENTRY OF ORDER

PLEASE TAKE NOTICE that on the 28th day of January, 2019, the attached Order Granting in Part,
Denying in Part, Plaintiffs' Motion to Amend Judgment was entered in the above-captioned case.

Dated this 29th day of January, 2019.

CHASEY LAW OFFICES



PETER L. CHASEY, ESQ.

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3295 N. Fort Apache Road, Suite 110

Las Vegas, NV 89129

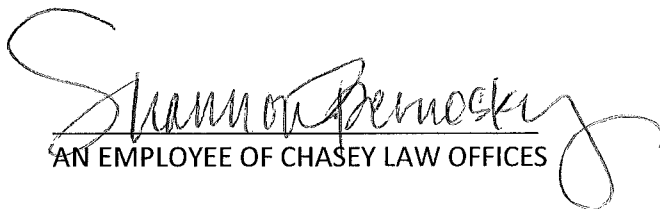
(702) 233-0393

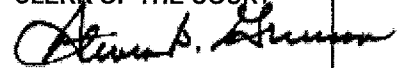
1
2 **CERTIFICATE OF SERVICE**

3 Pursuant to Rule 5(b) of the Nevada Rules of Civil Procedure, I hereby certify that on the 29th
4 day of January, 2019, I served a true and complete copy of **NOTICE OF ENTRY OF ORDER** upon those
5 persons designated by the parties in the E-Service Master List for the above-referenced matter in the
6 Eighth Judicial District Court eFiling System in accordance with the mandatory electronic service
7 requirements of Administrative Order 14-2 and the Nevada Electronic Filing and Conversion Rules:
8

9 Terry A. Moore, Esq.
10 Christian T. Balducci, Esq.
11 MARQUIS AURBACH COFFING
12 10001 Park Run Drive
13 Las Vegas, NV 89145
14 (702) 382-0711 Phone
(702) 382-5816 Fax
Attorneys for Defendants

Robert G. Reynolds
Diamanti Fine Jewelers
410 S. Rampart Blvd., Suite 140
Las Vegas, NV 89145

15
16 
17 AN EMPLOYEE OF CHASEY LAW OFFICES
18
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ORDR

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Nevada Bar No. 007650

CHASEY LAW OFFICES

3295 N. Fort Apache Road, Suite 110
Las Vegas, Nevada 89129
Tel: (702) 233-0393 Fax: (702) 233-2107
email: peter@chaseylaw.com
Attorney for Plaintiffs
ROBERT G. REYNOLDS and
DIAMANTI FINE JEWELERS, LLC

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1-10 inclusive,

Defendants.

) CASE NO.: A-17-753532-C
) DEPT NO.: XIII
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**ORDER GRANTING IN PART, DENYING IN
PART, PLAINTIFFS' MOTION TO AMEND
JUDGMENT**

THIS MATTER having come before this Court on January 7, 2019, on Plaintiff's Motion to Amend Judgment; Peter L. Chasey, Esq. of the Chasey Law Offices, appearing on behalf of Plaintiffs Robert G. Reynolds and Diamanti Fine Jewelers, LLC ("Plaintiffs") and Christian T. Balducci, Esq. of the law firm of Marquis Aurbach Coffing appearing on behalf of Raffi Tufenkjian and Luxury Holdings LV, LLC ("Defendants").

This Court, having reviewed the papers and pleadings on file herein, the papers and pleadings filed in this matter, oral argument of counsel, good cause appearing,

1 IT IS HEREBY ORDERED that Plaintiffs' Motion to Amend Judgment is GRANTED IN PART,
2
3 IT IS FURTHER ORDERED that the Order Granting Summary Judgment dated November 14,
4 2018 be amended by removing the first sentence of Paragraph 5 on page 6, and by removing the
5 word "therefore" from the second sentence of Paragraph 5 on page 6,

6 IT IS HEREBY FURTHER ORDERED that the Plaintiffs' Motion to Amend Judgment is DENIED
7 as to the remainder.

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9 IT IS SO ORDERED this 24th day of January, 2019.

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DISTRICT COURT JUDGE
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15 Respectfully Submitted By:

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17 CHASEY LAW OFFICES

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19 By: 

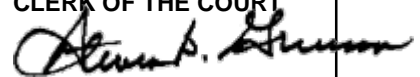
20 Peter L. Chasey, Esq.
21 Nevada Bar No. 7650
22 3295 N. Fort Apache Road, Ste. 110
23 Las Vegas, Nevada 89129
24 Attorneys for Plaintiffs

25 Approved as to form, only.

26 MARQUIS AURBACH COFFING

27 By: 

28 Terry A. Moore, Esq.
Nevada Bar No. 7831
Christian T. Balducci, Esq.
Nevada Bar No. 12688
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Defendants



NOTC

PETER L. CHASEY, ESQ.

Nevada Bar No. 007650

CHASEY LAW OFFICES

3295 N. Fort Apache Road, Suite 110

Las Vegas, Nevada 89129

Tel: (702) 233-0393 Fax: (702) 233-2107

email: peter@chaseylaw.com

Attorney for Plaintiffs

**DISTRICT COURT
CLARK COUNTY, NEVADA**

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Limited Liability Company,

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) CASE NO.: A-17-753532-C

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PLEASE TAKE NOTICE that on the 28th day of January, 2019, the attached Order Granting in Part,
Denying in Part, Plaintiffs' Motion to Amend Judgment was entered in the above-captioned case.

Dated this 29th day of January, 2019.

CHASEY LAW OFFICES


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Las Vegas, NV 89129

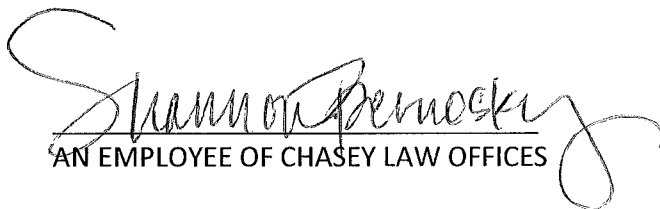
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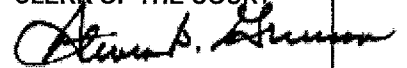
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ORDR

PETER L. CHASEY, ESQ.
Nevada Bar No. 007650

CHASEY LAW OFFICES

3295 N. Fort Apache Road, Suite 110
Las Vegas, Nevada 89129
Tel: (702) 233-0393 Fax: (702) 233-2107
email: peter@chaseylaw.com
Attorney for Plaintiffs
ROBERT G. REYNOLDS and
DIAMANTI FINE JEWELERS, LLC

**DISTRICT COURT
CLARK COUNTY, NEVADA**

ROBERT G. REYNOLDS, an individual, and
DIAMANTI FINE JEWELERS, LLC

Plaintiff,

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1-10 inclusive,

Defendants.

) CASE NO.: A-17-753532-C
) DEPT NO.: XIII
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**ORDER GRANTING IN PART, DENYING IN
PART, PLAINTIFFS' MOTION TO AMEND
JUDGMENT**

THIS MATTER having come before this Court on January 7, 2019, on Plaintiff's Motion to Amend Judgment; Peter L. Chasey, Esq. of the Chasey Law Offices, appearing on behalf of Plaintiffs Robert G. Reynolds and Diamanti Fine Jewelers, LLC ("Plaintiffs") and Christian T. Balducci, Esq. of the law firm of Marquis Aurbach Coffing appearing on behalf of Raffi Tufenkjian and Luxury Holdings LV, LLC ("Defendants").

This Court, having reviewed the papers and pleadings on file herein, the papers and pleadings filed in this matter, oral argument of counsel, good cause appearing,

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3 IT IS FURTHER ORDERED that the Order Granting Summary Judgment dated November 14,
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7 as to the remainder.

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9 IT IS SO ORDERED this 24th day of January, 2019.

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DISTRICT COURT JUDGE
13 

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15 Respectfully Submitted By:

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17 CHASEY LAW OFFICES

18
19 By: 

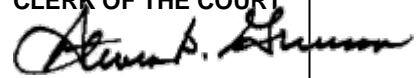
20 Peter L. Chasey, Esq.
21 Nevada Bar No. 7650
22 3295 N. Fort Apache Road, Ste. 110
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24 Attorneys for Plaintiffs

25 Approved as to form, only.

26 MARQUIS AURBACH COFFING

27 By: 

28 Terry A. Moore, Esq.
Nevada Bar No. 7831
Christian T. Balducci, Esq.
Nevada Bar No. 12688
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Defendants



NOA

Bradley M. Marx
Nevada Bar No. 12999
MARX LAW FIRM, PLLC
601 S. 10th St.
Las Vegas, Nevada 89101
Telephone: (702) 900-2541
brad@marxfirm.com
Attorney for Plaintiffs

**DISTRICT COURT
CLARK COUNTY, NEVADA**

ROBERT G. REYNOLDS, an Individual, and
DIAMANTI FINE JEWELERS, LLC, a Nevada
Limited Liability Company,

Plaintiffs,

vs.

RAFFI TUFENKJIAN, an individual, and
LUXURY HOLDINGS LV, LLC, a Nevada
Limited Liability Company, DOES 1-10, and
ROE CORPORATIONS 1-10, inclusive,

Defendants.

CASE NO. A-17-753532-B
DEPT NO. XIII

**ROBERT G. REYNOLDS AND
DIAMANTI FINE JEWELERS,
LLC'S NOTICE OF APPEAL**

Notice is hereby given that Robert G. Reynolds and Diamanti Fine Jewelers, LLC appeals to the Supreme Court of Nevada from this Court's order of January 28, 2019, for which a notice of entry of order was entered January 29, 2019, granting final judgment in favor of Defendant Raffi Tufenkjian and Luxury Holdings LV, LLC.

DATED this 19th day of February, 2019.

MARX LAW FIRM PLLC

By /s/ Bradley Marx

Bradley M. Marx
Nevada Bar No. 12999
601 S. 10th St.
Las Vegas, Nevada 89101
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I certify that on this 19th day of February, 2019, and pursuant to NRCP 5, I caused to be served a true and correct copy of the foregoing **ROBERT G. REYNOLDS AND DIAMANTI FINE JEWELERS, LLC'S NOTICE OF APPEAL**, to be served via the Court's electronic filing and service system to all parties on the current service list.

Terry A. Moore, Esq.
Christian T. Balducci, Esq.
MARQUIS AURBACH COFFING
1001 Park Run Drive
Las Vegas, NV 89145
Attorneys for Defendants

By /s/ Bradley Marx

Bradley Marx