IN THE SUPREME COURT OF THE STATE OF NEVADA

SOPHIE LAU, an individual; JEFFREY LAU, an individual, GOOD EARTH ENTERPRISES, INC., a California Corporation, and LIG LAND DEVELOPMENT, LLC, a California Limited Liability Company,

Appellants,

v.

CITY OF LAS VEGAS, a political subdivision of the State of Nevada, CAROLYN GOODMAN, as Mayor of the City of Las Vegas, CITY OF LAS VEGAS DEPARTMENT OF BUILDING & SAFETY, CODE ENFORCEMENT DIVISION, a department of the City of Las Vegas, VICKI OZUNA, Code Enforcement Manager; EMILY WETZSTEIN, Code Enforcement Assistant; KEVIN MCOSKER, director, Building and Safety department, JOHN BOYER, as City of Las Vegas Council Designee; DOES I through X.

Respondents.

CASE NO.: 82720

(EIGHTH JUDICIAL DISTRICT

COURT Case No. A-19-806791-W)

APPELLANTS' REPLY BRIEF IN SUPPORT OF THEIR OPENING BRIEF AND RESPONSE BRIEF TO RESPONDENTS' CROSS-APPEAL BRIEF

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I. ARGUMENT[1]

1. DESIGNEE'S OPINION WAS INFLUENCED BY THE INCORRECT LEGAL ASSUMPTION THAT APPELLANTS DID NOT HAVE STANDING TO APPEAR AT THE PROCEEDING.

The Designee's opinion was clearly influenced by his incorrect legal assumption that appellants did not have standing to appear before him. If an appeals officer's decision goes beyond factual findings, and includes statutory interpretation, this court reviews that portion of the decision de novo. Star Ins. Co. v. Neighbors, 122 Nev. 773, 776, 138 P.3d 507, 509-10 (2006); *see also* Constr. Indus, v. Chalue, 119 Nev. 348, 351, 74 P.3d 595, 597 (2003). Based on the Designee's incorrect legal assumption, it is unclear whether the Designee gave Appellants' testimony or evidence any judicial weight in his consideration to impose the City's fines against Appellants.

More specifically Designee's opinion states:

> In order for any person or entity to appear and contest an abatement and lien at the City of Las Vegas they must have standing and ownership of the property subject to abatement proceedings. In these hearings I have found that Good Earth Enterprises, Inc. had it's foreign corporation status permanently revoked in 1984. I have found LIG Land Developments LLC has never had a registration in the State of Nevada. There is currently no evidence either of these entities exist anywhere. I also find both of these entities if they exist at all have conducted business in the State of Nevada which is beyond the mere ownership of property. They have at a minimum employed Mr. Mann to oversee the

[1] The issues addressed in Respondent's Opening Brief on Cross-Appeal are identical to the issues raised by Appellant in their Opening Brief, as such, the arguments made in this Reply Brief shall also serve as Appellants' response to Respondent's Opening Brief on Cross-Appeal.

properties in which he was a resident and maintained it as an office for the entities and retained Nevada contractors to perform work on both properties. The entities, if they exist at all, have by admission spent thousands of dollars doing business of maintaining and operating the properties in this state.

Until such time as both entitles prove their existence, and comply with the registration requirements, they and their putative representative, Sophie Lau will not be allowed to appear in these proceedings as a representative. (Vol I 0016 - 0018)

Under NRS 80.055(6), a foreign corporation can defend themselves from litigation in Nevada. More specifically NRS 80.055(6) states:

NRS 80.055 Penalty for failure to comply with requirements for qualification; enforcement; regulations.

***

6. The **failure** of a corporation to comply with the provisions of NRS 80.010 to 80.040, inclusive, does not impair the validity of any contract or act of the corporation, **or prevent the corporation from defending** any action, suit or proceeding in any court of this State. (emphases added)

This Court has held that it is elementary that the legislature is without power to take from an owner or claimant of property the right to defend an action where it is sought, as in this case, to obtain a decree adjudging defendant to be without title to or right in property claimed by it as owner. Scott v. Day-Bristol Consol. Mining Co, 37 Nev. 299, 142 P. 625 (1914).

The Court in Scott further held:

To permit a plaintiff, however, to sue a corporation, bring it into court under process commanding it to answer, then to permit such plaintiff to strike the answer and take judgment by default, cannot be tolerated, especially in a case where the plaintiff is invoking the equitable powers

> of a court to quiet an alleged title to property. To seek equitable relief in a court and then question the right of the other party to be heard, does not comport with the principles of equity.

Scott v. Day-Bristol Consol. Mining Co, 37 Nev. 299, 304, 142 P. 625 (1914).

Contrary to Respondents' position, the Designee's statement was not to put Appellants on notice for any future proceedings before him. The proceeding before him was not intended to be the first part of an ongoing proceeding, but a one-time proceeding with no additional proceedings that would involve the parties and this Designee. The Designee's findings was based on the review of the evidence and the testimony provided to him. While it is unclear what weight the Designee put on the Appellants' testimony and evidence, it is clear that the Designee was influenced by his incorrect assumption that Appellants should not be allowed to appear before him. If standing was not a relevant factor in his analysis, the Designee had the option of including this issue regarding whether Appellants had standing in a footnote rather than include it in the body of the opinion.

The Designee's opinion was influenced by his incorrect assumption that Appellants had no standing. Because the Designee's opinion was based on an error of law, Appellants request that this Court set aside the Designee's decision.

2. THE DESIGNEE CONSIDERED EVIDENCE THAT WAS NOT PRESENTED DURING THE ADMINISTRATION HEARING OR PROVIDED TO APPELLANTS' COUNSEL PRIOR TO THE HEARING.

The designee abused his discretion by considering evidence that was not presented during the administration hearing. Nevada Rules of Civil Procedure do not apply to administrative proceedings. *See* Dutchess Bus. Serv., Inc. v. Nev. State Bd. of Pharmacy, 124 Nev. 701, 713, 191 P.3d 1159, 1167 (2008); *see also* NRCP 1 ("These rules govern the procedure in all civil actions and proceedings in the district courts."). In a proceeding before an administrative agency, discovery is determined by the procedures of that agency. *See* NRS 233B.040 (l) (authorizing administrative agencies to adopt "reasonable regulations" to aid in carrying out their duties). Nonetheless, due process guarantees that fundamental fairness apply to administrative proceedings. Dutchess Bus. Serv., Inc., 124 Nev. at 714, 191 P.3d at 1168. Thus, so long as there are procedural safeguards protecting the litigant's guarantee of fairness, the administrative agency's decision will be upheld. Dutchess Bus. Serv., Inc., 124 Nev. at 714, 191 P.3d at 1168.

The Due Process Clause requires notice and an opportunity to be heard before the government deprives a person of his or her liberty. Maiola v. State, 120 Nev. 671, 675, 99 P.3d 227, 229 (2004). "Administrative bodies must... give notice to the defending party of 'the issues on which decision will turn and ... the factual material on which the agency relies for decision so that [the defendant] may rebut it.' " Id.

(footnote omitted) (*quoting* Bowman Transp., Inc. v. Arkansas-Best Freight Sys., Inc., 419 U.S. 281, 288-89 n.4, 95 S.Ct. 438, 42 L.Ed.2d 447 (1974)). "[I]n the context of administrative pleadings, 'due process requirements of notice are satisfied where the parties are sufficiently apprised of the nature of the proceedings so that there is no unfair surprise.' " Id. at 712, 191 P.3d at 1167 (*quoting* Nev. State Apprenticeship Council v. Joint Apprenticeship & Training Comm. for the Elec. Indus., 94 Nev. 763, 765, 587 P.2d 1315, 1317 (1978)). *See* Dep't Mtr. Veh. v. Evans, 114 Nev. 41, 45, 952 P.2d 958, 961 (1998) (citing NRS 233B.123(4)) (stating that a defendant in an administrative proceeding is entitled to confront and cross-examine the witnesses against him).

In their Opposition, Respondents assert that they had asked Appellants during the hearing if they wanted to continue the hearing to review the new evidence and Appellants declined to continue. As a result, Respondents suggest to the Court that Appellants waived their right to object to new evidence presented to the Designee after the conclusion of the hearing. However, prior to the hearing, the Appellants' counsel sent a letter to Respondents requesting that Respondents provide Appellants with all of the documents that they intended to use at hearing. On September 17th, 2019, Appellants' counsel set a letter to Respondents stating:

> At this time, we have received the file from the client's former attorney, but it appears that we have not received the records that he requested from your office. Therefore, as we discussed, please send over the following documents:

1. Receipts from CGI to justify the cost of installing plywood at 233 S. 6th street ("El Cid"). We have the invoice, but not the backup.
2. Any documentation evidencing the determination that the El Cid abatement was an "emergency"
3. Any and all outstanding invoices related to the Properties owned by the Laus and/or their companies.
4. Any and all outstanding liens related to the Properties owned by the Laus and/or companies.
5. The entire file you have regarding this case (Vol. I 0023)

During the hearing, Respondents admitted that they had not provided Appellants with all of documentation for this case. More specifically:

> Q1: …case. The case hasn't actually closed yet. They just finished yesterday the – the entire abatement and just got the final inspection. So **generally, we don't provide everything**. What I do provide to you is, uh, everything that we're usin' in the documentation for, uh, to set up the hearing and, you know, if at a later time, you know, if you needed anything else. But, uh, we don't provide copies of all the mailings and everything until the case is closed and, uh, because it's still an open case. (emphases added) (Vol. III 0183).

Contrary to Respondents' position, Appellants are not merely needlessly nitpicking at an irrelevant issue. The documents that Respondents produced after the hearing were germane to the Designee's findings. More specifically the Designee's order states in part:

> There **Notices and Orders are the predicate** for the penalties imposed on these properties as set forth in the City request for imposition of costs and penalties in the evidence. Copies of the Notices and Orders are included in the **Binder A as supplemented by the City after the hearing**. (emphases added) (Vol I 0016 - 0018)

Appellants should have had an opportunity to review the documents prior to the administrative hearing. As Respondents correctly noted in their brief, the hearing

before the City's Designee was not a judicial court proceeding but an administrative hearing before a designee of the Las Vegas City Council and there were no rules of evidence established for the hearing. However, prior to the administrative hearing, Appellants requested that Respondents produce all of the documents related to this dispute, not just a few. Respondents chose to withhold critical documents from Appellants and instead elected to blindside Appellants by not producing these documents either before or during the hearing but after the hearing had concluded.

These documents were central to the Designee's determination to fine Appellants. The Designee abused his discretion when he allowed Respondents to introduce critical documents into the case after the hearing was concluded.

The Designee's conduct in allowing the Respondents to supplement their evidence after the administrative hearing was concluded is clearly arbitrary and capricious. The Respondents should not be allowed a mulligan to submit evidence that it should have submitted into the record during the Administrative Hearing. The Designee's decision must be reversed because the Respondents violated the Appellants' due process rights.

3. THE DESIGNEE ABUSED HIS DISCRETION IN REACHING THE ADMINISTRATIVE DECISION.

The District Court found that the Designee abused his discretion and reduced the fines against Appellants; however the District Court should have set aside the

fines against Appellants completely. When an aggrieved party "appeal[s] from a district court order denying a petition for judicial review of an administrative decision, this court examines the administrative decision for clear error or abuse of discretion." Grover C. Dils Med. Ctr. v. Menditto, 121 Nev. 278, 283, 112 P.3d 1093, 1097 (2005). While the Court reviews purely legal questions de novo, the Court will defer to the administrative officer's "fact-based conclusions of law" and will not disturb them if supported by substantial evidence. Id. Substantial evidence is "that which a reasonable person might accept as adequate to support a conclusion." Id. (internal quotation marks omitted). The Court will not reweigh the evidence or substitute our judgment for that of the appeals officer on an issue of credibility. Id. at 283-84, 112 P.3d at 1097. The Court may consider only the record before the appeals officer. Id.

A manifest abuse of discretion requires a "'clearly erroneous interpretation of the law or a clearly erroneous application of a law or rule.'" State v. Eighth Judicial Dist. Court, 127 Nev. 927, 932, 267 P.3d 777, 780 (2011) (*quoting* Steward v. McDonald, 958 S.W.2d 297, 300 (Ark. 1997)). "An arbitrary or capricious exercise of discretion is one 'founded on prejudice or preference rather than on reason,' or 'contrary to the evidence or established rules of law.'" Id. at 931-32, 267 P.3d at 780 (internal citation omitted) (quoting Black's Law Dictionary 119, 239 (9th ed. 2009). An abuse of discretion occurs when the record does not contain substantial evidence

supporting the administrative decision. Construction Indus. v. Chalue, 119 Nev. 348, 352, 74 P.3d 595, 597 (2003).

During the administrative hearing there were four items discussed that Appellants needed to complete no later than January 18, 2019 for the El Sid Property and January 22, 2019 for the El Cide Annex Property: 1) removal of palm trees from around El Cid and the Annex, 2) hire a licensed security firm to provide 24- hour security to prevent access into El Cid and the Annex; 3) fence the entire perimeter of the El Cid and Annex with security fencing to prevent access into the building; and 4) contact City Code Enforcement and propose and agree upon an action plan and timeframe acceptable to the Respondents to hire a Nevada licensed contractor to obtain all required demolition permits no later than 60 days from the date of these notices.

As the Appellants testified at the Administrative Hearing, they complied with three of the four requirements within the specified time and had completed all four requirements within six weeks from the notices. However, the Designee choose to ignore Appellants' testimony and evidence and find in favor of the Respondents. Furthermore, the Designee chose to rely on evidence that was only submitted after the hearing had concluded.

The District Court reviewed the record and determined that the Designee had abused his discretion by approving and imposing the maximum daily civil fines after the Appellants had presented evidence that they had fulfilled 3 of the 4 items that Respondents had requested within the allotted time.

In their opposition, Respondents attempt to argue that this Court should look at the history of the properties prior to January 2019 in order to justify the Designee's abuse of discretion for failing to take into consideration that Appellants had substantially completed with the Respondent's requests. However, at the same time that the Respondents allege that Appellants were responsible for creating an imminent hazard, the Respondents do not take any responsibility for their contribution to the situation surrounding the Subject Properties during this time period. The Respondents avoid taking any responsibility for the rampant transient problem located in the immediate area or any responsibility for allowing criminals, drug users and vagrants to loiter across the street from Las Vegas High School. Instead Respondents take the position that the problems of downtown Las Vegas should be borne and dealt with by private property owners like Appellants and not by the City of Las Vegas.

The evidence and testimony presented to the Designee demonstrates that the Appellants substantially complied with Respondents' requests. However, as stated in the Designee's opinion, the Designee did not take into consideration the testimony

and the evidence presented by Appellants and considered evidence submitted by Respondents' after the hearing. The District Court held that the Designee abused his discretion in part by failing to take into consideration that Appellants had substantially complied with Respondents' requests.

LVMC § 9.04.040 states the maximum penalty for a violation may not exceed One Thousand Dollars ($1,000.00) but does not mandate it to be One Thousand Dollars ($1,000.00) LVMC § 9.04.040(A). In this dispute, Appellants complied with three of the four requirements within the ten day period imposed by the Respondents and had completed all four requirements within six weeks. The Designee abused his discretion by failing to take into consideration that Appellants had worked in good faith to comply with the Notices.

The Designee's fines of One Thousand Dollars ($1,000) a day were excessive, arbitrary and capricious and should be set aside. The District Court correctly determined that the Designee's decision was an abuse of discretion and was not based on evidence or established rules of law. However, the District Court should have set aside the Designee's decision instead of reducing the fines. Appellants respectfully requests that this Court set aside the Designee's decision.

4. THE ABATEMENT FEES IMPOSED UPON APPELLANTS WERE IMPOSED BEFORE RESPONDENTS MET NECESSARY PRECONDITIONS

The Designee abused his discretion by imposing a fine on Appellants under LVMC § 9.04.080. LVMC § 9.04.080(D) allows for emergency abatement of imminent hazards. This requires that the City Manager and at least one other public agency official (e.g. Fire and Metro) concur with or request the designation of imminent hazard. More specifically LVMC § 9.04.080(D) states:

> LVMC § 9.04.080. Necessary actions.
> D. If, in the opinion of the City Manager, or a duly authorized representative, the condition of a property constitutes an imminent hazard, the City Manager or representative may order immediate abatement of the hazard without notice. The abatement work shall be limited to the minimum work necessary to remove the hazard. **Before ordering abatement under this Section, the City Manager or representative shall first obtain the concurrence of at least one other City or public agency official. City and public agency officials that may concur with or request a designation of imminent hazard pursuant to this Section include**, without limitation, the City Manager; the Las Vegas Metropolitan Police Department; the Southern Nevada Health District; and the Departments of Fire and Rescue, Public Works, Planning, Public Safety, and Parks and Recreation. The City shall pay the initial cost and expense of any emergency abatement from any appropriation made available for that purpose. Any costs and expenses incurred, and any fees imposed, in connection with the removal of an imminent hazard may be assessed against the property or the owner in accordance with the procedure described in Section 9.04.100. (emphases added))

If a statute is unambiguous, this court interprets the statute according to its plain language. Williams v. United Parcel Servs., 129 Nev. 386, 391-92, 302 P.3d 1144, 1147 (2013). The Court will look beyond plain language if a statute is

ambiguous or silent on the issue in question, and we read statutes within a common statutory scheme harmoniously with one another whenever possible. Allstate Ins. Co. v. Fackett, 125 Nev. 132, 138, 206 P.3d 572, 576 (2009). Under LVMC § 9.04.080(D), the Respondents fines against Appellants for both the El Cid and the MI Property were improper.

i. **El Cid Property (233 South 6th Street)**

On December 17, 2018, the Department of Fire and Rescue and Las Vegas Metropolitan Police Department deemed the El Cid an imminent hazard; however it was not until January 31, 2019 that the City Managers determined that the El Cid was an imminent hazard and thereby fulfilling the requirement under 9.04.080(d). (Vol. I 0065) However, the Respondents cannot require Appellants to pay for costs incurred prior to the property being determined to be an imminent hazard by the City Managers.

As a result, there could be no passing on the costs to Appellants for work performed between December 17th and 20th, 2018 under LVMC § 9.04.080. Of course, without that emergency abatement cost, Respondents are unable to pass on the 15% administrative fee to Appellants. The abatement fee and administrative fee must be voided because Respondents failed to comply with LVMC § 9.04.080(D).

ii. **MI Property (615 E. Carson Avenue)**

There is no evidence that the MI Property was ever declared an imminent hazard pursuant to LVMC § 9.04.080(D). On March 18, 2019, Respondents sent Appellants a letter entitled "Dangerous Building Notice and Order to Comply" which would demonstrate that the Respondents were abiding by LVMC § 9.04.080(B) and notifying the Appellants that they intended to designate the property as an imminent hazard at a latter date but there has been no evidence provided by the Respondents to demonstrate that this property was ever designed as an imminent hazard. (Vol 1. 0073-080). The January 31, 2019 declaration by the City Manager only involved El Cid (aka 233 South 6th Street) and 232 South 7th Street, not the MI Property (615 E. Carson Ave.) (Vol. I. 0065) Because there is no declaration of imminent hazard for this property, the invoice cannot be passed onto Appellants and Respondents cannot pass on the 15% administrative fee to Appellants. Without Respondents complying with LVMC § 9.04.080(D), the Court must void this abatement fee and related administrative fee.

In their brief, Respondents assert that Appellants waived their arguments concerning LVMC § 9.04.080. However, while Appellants did not specifically address this issue during the hearing, they did address it in their September 24, 2019 letter to the City of Las Vegas Department of Planning. (Vol. III 238-240, Vol IV. 0241). Furthermore, LVMC § 9.04.080 was fully briefed in Petitioner's Opening

Brief and Reply Brief to the District Court. (Vol. VI 0405-0425, Vol. IX 0632-0645). Appellants respectfully requests that this Court set aside the Designee's decision.

5. DUE TO THE ABHORRENT CONDUCT EXHIBITED TOWARDS APPELLANTS, THE COURT SHOULD SET ASIDE THE DESIGNEE'S DECISION.

Appellants respectfully requests that this Court set aside the Designee's Decision. Pursuant to NRS 233B.135(2), the Court can set aside the designee's decision if the decision is characterized by abuse of discretion. More specifically NRS 233B.135(2) states:

> **NRS 233B.135 Judicial review: Manner of conducting; burden of proof; standard for review.**
>
> 1. Judicial review of a final decision of an agency must be:
>
> (a) Conducted by the court without a jury; and
>
> (b) Confined to the record.
>
> In cases concerning alleged irregularities in procedure before an agency that are not shown in the record, the court may receive evidence concerning the irregularities.
>
> 2. The final decision of the agency shall be deemed reasonable and lawful until reversed or set aside in whole or in part by the court. The burden of proof is on the party attacking or resisting the decision to show that the final decision is invalid pursuant to subsection 3.
>
> 3. The court shall not substitute its judgment for that of the agency as to the weight of evidence on a question of fact. The court may remand or affirm the final decision or set it aside in whole or in part if substantial rights of the petitioner have been prejudiced because the final decision of the agency is:
>
> (a) In violation of constitutional or statutory provisions;
>
> (b) In excess of the statutory authority of the agency;
>
> (c) Made upon unlawful procedure;
>
> (d) Affected by other error of law;

(e) Clearly erroneous in view of the reliable, probative and substantial evidence on the whole record; or

(f) Arbitrary or capricious or characterized by abuse of discretion.

4. As used in this section, "substantial evidence" means evidence which a reasonable mind might accept as adequate to support a conclusion.

In this dispute, the Designee made improper legal conclusions about the Appellants standing and considered documents submitted by Respondents after the hearing had concluded. Furthermore, the Designee failed to consider whether Respondents had properly abided by LVMC § 9.04.080. While these errors are attributed to the Designee, the Respondents should not be given a mulligan and allowed to re-open the hearing for additional testimony and/or argument to correct their own mistakes in this matter. Appellants respectfully requests that this Court set aside the Designee's decision and dismiss Respondents' claims against Appellants.

II. CONCLUSION

Appellants respectfully request that this Court determines that the Administrative Decision was unsupported by the record and that the Designee abused his discretion in granting Respondents the relief that they requested. The Designee violated the Appellants due process rights by considering evidence that was presented to the Designee after the hearing. Furthermore the Designee made an incorrect legal assumption regarding Appellants standing in the matter and failed to consider that Appellants significantly fulfilled their four obligations under the Notice.

Appellants respectfully requests that this Court set aside the Designee' Decision and dismiss this case against Appellants. Based in part of the omissions and errors committed by Respondent to the detriment of Appellants, Respondents should not be allowed a second opportunity to pursue Appellants.

ATTORNEY'S CERTIFICATE OF COMPLIANCE

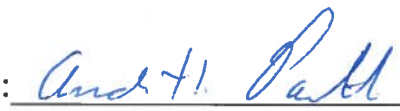
1. I hereby certify that this brief complies with the formatting requirements of NRAP 32(a)(4), the typeface requirements of NRAP 32(a)(5) and they type style requirements of NRAP 32(a)(6) because this brief has been prepared in a proportionally spaced typeface using Word in Times New Roman 14pt. type.

2. I further certify that this brief complies with the page- or type-volume limitations of NRAP 32(a)(7) because, excluding the parts of the brief exempted by NRAP 32(a)(7)(c), it is proportionately spaced, has a typeface of 14 points or more, and contains 4051 words.

3. Finally, I hereby certify that I have read this appellate brief, and to the best of my knowledge, information, and belief, it is not frivolous or interposed for any improper purpose. I further certify that this brief complies with all applicable Nevada Rules of Appellate Procedure, in particular NRAP 28(e)(1), which requires every assertion in the brief regarding matters in the record to be supported by a reference to the page and volume number, if any, of the transcript or appendix where the matter relied on is to be found. I understand that I amy be subject to sanctions in the event that the accompanying brief is not conformity with the requirements of the Nevada Rules of Appellate Procedure.

Dated this 5 day of November, 2021.

Law Office of Andrew H. Pastwick L.L.C.

By: 

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VERIFICATION

I, ANDREW H. PASTWICK, declare as follows:

1. I am an attorney at the Law Office of Andrew H. Pastwick and represent Appellants in this matter.

2. I verify that I have read this Appellants' Reply Brief in Support of their Opening Brief and Response Brief to Respondents' Cross-Appeal Brief, and that it is true to the best of my own knowledge, except for those matters therein stated on information and belief, and, for those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Date this 5 day of November, 2021.

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CERTIFICATE OF SERVICE

I certify that on the 5th day of November, 2021, a true and correct copy of the foregoing Appellants' Reply Brief in Support of their Opening Brief and Response Brief to Respondents' Cross-Appeal Brief, was electronically filed with the Nevada Supreme Court by using the Nevada Supreme Court E-Filing system.

I further certify that the following participants in this case are registered with the Nevada Supreme Court of Nevada E-Filing System, and that the service of the Opening Brief has been accomplished to the following individuals via electronic service.

Bryan Scott
John Curtas
Attorneys for Respondents

Andrew H. Pastwick

An Employee of Law Office of Andrew H. Pastwick L.L.C.