

IN THE SUPREME COURT OF THE STATE OF NEVADA

MEI-GSR HOLDINGS, LLC, a Nevada Limited Liability Company, GRAND SIERRA RESORT UNIT OWNERS' ASSOCIATION, a Nevada nonprofit corporation, GAGE VILLAGE COMMERCIAL DEVELOPMENT, LLC, a Nevada Limited Liability Company; AM-GSR HOLDINGS, LLC, a Nevada Limited Liability Company,

Appellants,

vs.

ALBERT THOMAS, individually; JANE DUNLAP, individually; JOHN DUNLAP, individually; BARRY HAY, individually; MARIE-ANNE ALEXANDER, as Trustee of the MARIE-ANNE ALEXANDER LIVING TRUST; MELISSA VAGUJHELYI and GEORGE VAGUJHELYI, as Trustees of the GEORGE VAGUJHELYI AND MELISSA VAGUJHELYI 2001 FAMILY TRUST AGREEMENT, U/T/A APRIL 13, 2001; D' ARCY NUNN, individually; HENRY NUNN, individually; MADELYN VAN DER BOKKE, individually; LEE VAN DER BOKKE, individually; ROBERT R. PEDERSON, individually and as Trustee of the PEDERSON 1990 TRUST; LOU ANN PEDERSON, individually and as Trustee of the PEDERSON 1990 TRUST; LORI ORDOVER, individually; WILLIAM A. HENDERSON, individually; CHRISTINE E. HENDERSON, individually; LOREN D. PARKER, individually; SUZANNE C. PARKER, individually; MICHAEL IZADY, individually; STEVEN TAKAKI, as Trustee of the STEVEN W. TAKAKI & FRANCES S. LEE REVOCABLE TRUSTEE AGREEMENT, UTD

Supreme Court No. 86092

District Court Case No. CV12-02222

Electronically Filed
Jul 10 2023 02:20 PM
Elizabeth A. Brown
Clerk of Supreme Court

JANUARY 11, 2000; FARAD TORABKHAN, individually; SAHAR TAVAKOLI, individually; M&Y HOLDINGS, LLC; JL&YL HOLDINGS, LLC; SANDI RAINES, individually; R. RAGHURAM, as Trustee of the RAJ AND USHA RAGHURAM LIVING TRUST DATED APRIL 25, 2001; USHA RAGHURAM, as Trustee of the RAJ AND USHA RAGHURAM LIVING TRUST DATED APRIL 25, 2001; LORI K. TOKUTOMI, individually; GARRET TOM, as Trustee of THE GARRET AND ANITA TOM TRUST, DATED 5/14/2006; ANITA TOM, as Trustee of THE GARRET AND ANITA TOM TRUST, DATED 5/14/2006; RAMON FADRILAN, individually; FAYE FADRILAN, individually; PETER K. LEE and MONICA L. LEE, as Trustees of the LEE FAMILY 2002 REVOCABLE TRUST; DOMINIC YIN, individually; ELIAS SHAMIEH, individually; JEFFREY QUINN, individually; BARBARA ROSE QUINN individually; KENNETH RICHE, individually; MAXINE RICHE, individually; NORMAN CHANDLER, individually; BENTON WAN, individually; TIMOTHY D. KAPLAN, individually; SILKSCAPE INC.; PETER CHENG, individually; ELISA CHENG, individually; GREG A. CAMERON, individually; TMI PROPERTY GROUP, LLC; RICHARD LUTZ, individually; SANDRA LUTZ, individually; MARY A. KOSSICK, individually; MELVIN CHEAH, individually; DI SHEN, individually; NADINE'S REAL ESTATE INVESTMENTS, LLC; AJIT GUPTA, individually; SEEMA GUPTA, individually; FREDERICK FISH, individually; LISA FISH, individually; ROBERT A. WILLIAMS, individually; JACQUELIN PHAM, as Manager of Condotel 1906 LLC; MAY ANNE HOM, as Trustee of the MAY ANNE HOM TRUST;

MICHAEL HURLEY, individually; DUANE WINDHORST, as Trustee of DUANE H. WINDHORST TRUST U/A dtd. 01/15/2003 and MARILYN L. WINDHORST TRUST U/A/ dtd. 01/15/2003; MARILYN WINDHORST, as Trustee of DUANE H. WINDHORST TRUST U/A dtd. 01/15/2003 and MARILYN L. WINDHORST TRUST U/A/ dtd. 01/15/2003; VINOD BHAN, individually; ANNE BHAN, individually; GUY P. BROWNE, individually; GARTH A. WILLIAMS, individually; PAMELA Y. ARATANI, individually; DARLEEN LINDGREN, individually; LAVERNE ROBERTS, individually; DOUG MECHAM, individually; CHRISTINE MECHAM, individually; KWANG SOON SON, individually; SOO YEU MOON, individually; JOHNSON AKINBODUNSE, individually; IRENE WEISS, as Trustee of the WEISS FAMILY TRUST; PRAVESH CHOPRA, individually; TERRY POPE, individually; NANCY POPE, individually; JAMES TAYLOR, individually; RYAN TAYLOR, individually; KI NAM CHOI, individually; YOUNG JA CHOI, individually; SANG DAE SOHN, individually; KUK HYUN (CONNIE) YOO, individually; SANG SOON (MIKE) YOO, individually; BRETT MENMUIR, as Manager of CARRERA PROPERTIES, LLC; WILLIAM MINER, JR., individually; CHANH TRUONG, individually; ELIZABETH ANDRES MECUA, individually; SHEPHERD MOUNTAIN, LLC; ROBERT BRUNNER, individually; AMY BRUNNER, individually; JEFF RIOPELLE, as Trustee of the RIOPELLE FAMILY TRUST; PATRICIA M. MOLL, individually; DANIEL MOLL, individually,

Respondents.

**APPENDIX TO RESPONDENTS' REPLY TO APPELLANTS' RESPONSE
TO MAY 8, 2023 ORDER TO SHOW CAUSE**

VOLUME 3 OF 4

Submitted for all respondents by:

ROBERT L. EISENBERG (SBN 0950)
LEMONS, GRUNDY & EISENBERG
6005 Plumas Street, Third Floor
Reno, NV 89519
775-786-6868

JARRAD C. MILLER (SBN 7093)
BRIANA N. COLLINGS (SBN 14694)
ROBERTSON, JOHNSON, MILLER & WILLIAMSON
50 West Liberty Street, Suite 600
Reno, NV 89501
775-329-5600

ATTORNEYS FOR RESPONDENTS ALBERT THOMAS, et al.

INDEX TO RESPONDENTS' APPENDIX

<u>NO.</u>	<u>DOCUMENT</u>	<u>DATE</u>	<u>VOL.</u>	<u>PAGE NO.</u>
1.	Order Appointing Receiver and Directing Defendants' Compliance Ex. 1: Seventh Amendment to Condominium Declaration of Covenants, Codes, Restrictions and Reservations of Easements for Hotel-Condominiums at Grand Sierra Resort Ex. 2: Unit Maintenance Agreement Ex. 3: Unit Rental Agreements	01/07/2015	1	1 – 158
2.	Complaint	08/27/2012	1	159 – 180
3.	Second Amended Complaint	03/26/2013	1	181 – 206
4.	Findings of Fact, Conclusions of Law and Judgment	10/09/2015	1	207 – 230
5.	Order Granting Plaintiffs' Motion for Case-Terminating Sanctions	10/03/2014	1	231 – 243
6.	Notice of Posting Supersedeas Bond	03/13/2023	2	244 – 256
7.	Order [on application for temporary restraining order, and motion for preliminary injunction]	12/05/2022	2	257 – 265
8.	Order Approving Parties Stipulation	02/07/2023	2	266 – 286
9.	Order [granting motion to certify Amended Final Judgment as final pursuant to NRCP 54(b)]	06/28/2023	2	287 – 290
10.	Defendants' Motion to Dismiss for Lack of Subject Matter Jurisdiction	12/01/2015	2	291 – 459
11.	Order [granting motion to dismiss]	05/09/2016	2	460 – 473

12.	Order Granting Motion to Substitute	01/25/2019	2	474 – 475
13.	Motion to Substitute Receiver	12/27/2018	3	476 – 516
14.	Order Granting Motion for Instructions to Receiver	02/15/2019	3	517 – 519
15.	Receiver’s Report re GSRUOA, for the Period from September 1 through September 30, 2019	10/07/2019	3	520 – 527
16.	Affidavit of Bias or Prejudice Concerning Kathleen Sigurdson, Esq. Pursuant to NRS 1.235	12/28/2020	3	528 – 611
17.	Order of Recusal of Presiding Judge and for Random Reassignment	01/07/2021	3	612 – 685
18.	Order Disqualifying All Judicial Officers of the Second Judicial District Court	01/21/2021	3	686 – 688
19.	Plaintiffs’ Peremptory Challenge of Judge	01/22/2021	3	689 – 690
20.	Memorandum of Temporary Assignment	02/24/2021	3	691 – 692
21.	Plaintiffs’ Matrix and Motion for Clarification	08/08/2022	3	693 – 713
22.	Order [reassigning matter to Senior Judge Gonzalez]	09/29/2022	3	714 – 715
23.	Order Granting Motion to Strike Defendants’ Peremptory Challenge of Judge	11/02/2022	3	716 – 723
24.	Order [awarding punitive damages]	01/17/2023	4	724 – 729

25.	Final Judgment	02/06/2023	4	730 – 733 (734-735 intentionally blank)
26.	Amended Final Judgment	04/10/2023	4	736 – 739
27.	Second Amended Final Monetary Judgment	06/29/2023	4	740 – 744
28.	Application for Temporary Restraining Order, and Motion for Preliminary Injunction	03/01/2022	4	745 – 792
29.	Order [denying Defendants’ motion to modify and terminate receivership]	03/27/2023	4	793 – 795
30.	Order [continuing hearing]	03/28/2023	4	796 – 797
31.	Rough Draft of Transcript	06/09/2023	4	798 – 808
32.	Order [on motion for order to show cause]	05/23/2023	4	809 – 811
33.	Order [overruling Defendants’ objection to Receiver’s calculations contained in exhibit 1 attached to Receiver’s omnibus reply to parties’ oppositions to the Receiver’s motion for orders & instructions]	03/27/2023	4	812 – 814

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Robertson, Johnson, Miller & Williamson, over the age of eighteen, and not a party to the within action. I further certify that on July 10, 2023, I electronically filed the foregoing with the Clerk of the Court by using the ECF system which served the following parties electronically:

Jordan T. Smith, Esq.
Pisanelli Bice PLLC
400 South 7th Street, Suite 300
Las Vegas, NV 89101
*Attorneys for Appellants
MEI-GSR Holdings, LLC;
Gage Village Commercial
Development, LLC; and
AM-GSR Holdings, LLC*

F. DeArmond Sharp, Esq.
Stefanie T. Sharp, Esq.
Robison, Sharp Sullivan & Brust
71 Washington Street
Reno, NV 89503
*Attorneys for Receiver
Richard M. Teichner*

Abran Vigil, Esq.
Meruelo Group, LLC
Legal Services Department
5th Floor Executive Offices
2535 Las Vegas Boulevard South
Las Vegas, NV 89109
*Attorneys for Appellants
MEI-GSR Holdings, LLC;
Gage Village Commercial
Development, LLC; and
AM-GSR Holdings, LLC*

Ann O. Hall, Esq.
David C. McElhinney, Esq.
Meruelo Group, LLC
2500 E. 2nd Street
Reno, NV 89595
*Attorney for Appellants
MEI-GSR Holdings, LLC;
Gage Village Commercial
Development, LLC; and
AM-GSR Holdings, LLC*

/s/ Stefanie Martinez

An Employee of Robertson, Johnson,
Miller & Williamson

ORIGINAL

FILED
Electronically
CV12-02222
2018-12-27 03:14:28 PM
Jacqueline Bryant
Clerk of the Court
Transaction # 7041932 : bvirrey

CODE: 2490

Jarrad C. Miller, Esq. (NV Bar No. 7093)
Jonathan J. Tew, Esq. (NV Bar No. 11874)
Robertson, Johnson, Miller & Williamson
50 West Liberty Street, Suite 600
Reno, Nevada 89501
(775) 329-5600
Attorneys for Plaintiffs

SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

IN AND FOR THE COUNTY OF WASHOE

ALBERT THOMAS, individually; *et al.*,

Plaintiffs,

vs.

Case No. CV12-02222
Dept. No. 10

MEI-GSR Holdings, LLC, a Nevada Limited
Liability Company, GRAND SIERRA
RESORT UNIT OWNERS' ASSOCIATION,
a Nevada nonprofit corporation, GAGE
VILLAGE COMMERCIAL
DEVELOPMENT, LLC, a Nevada Limited
Liability Company; AM-GSR HOLDINGS,
LLC, a Nevada Limited Liability Company;
and DOE DEFENDANTS 1 THROUGH 10,
inclusive,

Defendants.

MOTION TO SUBSTITUTE RECEIVER

Plaintiffs Albert Thomas *et al.*, by and through their counsel of record, the law firm of
Robertson, Johnson, Miller & Williamson, hereby move the Court for an order granting
substitution of the receiver, James S. Proctor ("Mr. Proctor"), with Richard Teichner, CPA,
ABV, CVA, MAFF, CFF, CRFAC, FCPA, CGMA and CDFA ("Mr. Teichner"). This Motion is
supported by the attached memorandum of points and authorities, the attached exhibits, the
papers, pleadings, declaration and documents on file herein, and any oral argument this Court
may choose to hear.

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. INTRODUCTION**

3 Plaintiffs respectfully request that this Court grant this motion to substitute Mr. Teichner
4 in place of Mr. Proctor because the Defendants have compromised the neutrality of Mr. Proctor.

5 This Court is well aware of the outrageous acts the Defendants committed which
6 necessitated the appointment of a receiver in this case. In the words of the Nevada Supreme
7 Court, Defendants “engaged in a series of illegal and unethical business practices.”

8 Unfortunately, during the pendency of the appeal, after this Court’s dismissal of the
9 action, the Defendants and the receiver negotiated work/compensation outside of the receivership
10 eliminating the neutrality requirement of a receiver.

11 **II. FACTUAL BACKGROUND**

12 Mr. Proctor was appointed under the terms of this Court’s Order Appointing Receiver
13 and Directing Defendants’ Compliance filed January 7, 2015 (“Receiver Order”). Mr. Proctor
14 served in that capacity until this Court dismissed this action for a lack of subject matter
15 jurisdiction on May 9, 2016 (“Dismissal”). Plaintiffs appealed the dismissal on May 26, 2016.
16 On February 26, 2018 the Nevada Supreme Court issued its Order of Reversal and Remand (the
17 Defendants subsequently exhausted their reconsideration remedies delaying the remittitur of the
18 action).

19 Shortly after the Dismissal in May of 2016, the GSR returned to its “illegal and unethical
20 business practices” cutting off virtually all rental revenue to Plaintiffs. (See Exhibits 1 and 2,
21 correspondence from Defendants to Plaintiffs and sample monthly rental statements from
22 Defendants to Plaintiffs.) To further complicate this matter, after the Dismissal in May 2016,
23 the Defendants offered Mr. Proctor compensation for continued work and Mr. Proctor made a
24 proposal to continue. (See Exhibit 3, Email from Mr. Proctor.)

25 In addition to the business negotiations between Mr. Proctor and Defendants, Mr. Proctor
26 had previously informed Plaintiffs’ counsel that he was acting as an expert witness for attorney
27 Mark Wray (an attorney for Defendants) on multiple cases. (See Exhibit 4, Email from Mr.
28 Proctor.) Standing alone, Plaintiffs were willing to accept Mr. Proctor’s representation that he

1 could act as a neutral receiver as dictated by the law despite the work with Mr. Wray. Id.
2 Plaintiffs are not willing to accept the negotiations for work outside of the receivership and
3 working relationship between receiver and counsel for Defendants.

4 Attached as Exhibit 5 is the curriculum vitae for Richard Teichner. Mr. Teichner is
5 highly qualified and willing to serve as a receiver in this action.

6 III. LEGAL ARGUMENT

7 A foundational principal of receivership law requires that court appointed receivers
8 remain neutral and unbiased. *Anes v. Crown Pshp., Inc.*, 113 Nev. 195, 932 P.2d 1067 (1997).
9 A “receiver is a neutral party appointed by the court to take possession of property and preserve
10 its value for the benefit of the person or entity subsequently determined to be entitled to the
11 property.” *Id.* at 199, 1069. The Court has clarified this bedrock rule:

12 A receiver is an indifferent person between the parties to a cause, appointed by
13 the court to receive and preserve the property or fund in litigation *pendent lite*,
14 when it does not seem reasonable to the court that either party should hold it. He
15 is not the representative of either party to the action, but is uniformly regarded as
16 an officer of the court, exercising his functions in the interest of neither plaintiff
nor defendant, but for the common benefit of all parties in interest. **He should be
a person wholly impartial and indifferent to all parties in interest.**

17 *Bowler v. Leonard*, 70 Nev. 370, 382, 269 P.2d 833, 839 (1954) (emphasis added); *see*
18 *also Booth v. Clark*, 58 U.S. 322, 331 (1855). A receiver may not act on behalf of or represent a
19 particular party, and if a receiver does, should be removed. *See First Nat'l Bank v. E. T. Barnum*
20 *Wire & Iron Works*, 60 Mich. 487, 491, 27 N.W. 657, 657 (1886) (also holding that the position
21 of a receiver requires “the **strictest** impartiality” (emphasis supplied).) Furthermore, “[a]
22 receiver may not deal with the property under his or her control in such a way as to benefit
23 himself or herself or his or her associates.” 65 Am Jur 2d Receivers § 91.

24 In this case, Mr. Proctor can no longer be viewed as impartial and indifferent to all parties
25 in interest. Unfortunately, the negotiations for a business relationship between Defendants and
26 Mr. Proctor after the Dismissal, and the working relationship between Mr. Proctor and counsel
27 for the Defendants, far exceed the receiver neutrality requirement and Mr. Proctor must be
28 substituted as receiver.

1 Ultimately, this Court has discretionary authority to appoint, dismiss, or substitute a
2 receiver in an action. NRS 32.010; *Bowler*, 70 Nev. at 383, 839 (“the appointment of a receiver
3 . . . is to a considerable extent a matter resting in the discretion of the district court to which the
4 application is made . . .”); *See also, Wehrs v. Sullivan*, 217 Mo. 167, 170, 116 S.W. 1104, 1105
5 (1909) (acting as a court of equity, a trial court has authority to appoint and substitute a receiver.)

6 In the instant case, this Court should exercise its sound discretion to substitute Mr.
7 Teichner in the place of Mr. Proctor.

8 **IV. CONCLUSION**

9 Plaintiffs respectfully request that this Court substitute Richard Teichner for Mr. Proctor
10 in this action under the terms of the Receiver Order. Further, this Court should direct Mr. Proctor
11 to work with Mr. Teichner, with compensation, for a period of sixty (60) days to transition all of
12 the books and records of the receivership to Mr. Teichner.

13 **AFFIRMATION**

14 Pursuant to NRS § 239B.030, the undersigned does hereby affirm that the preceding
15 document does not contain the social security number of any person.

16 RESPECTFULLY SUBMITTED this 27th day of December, 2018

17 ROBERTSON, JOHNSON,
18 MILLER & WILLIAMSON
50 West Liberty Street, Suite 600
19 Reno, Nevada 89501

20 By: 

Jarrad C. Miller, Esq.
Jonathan J. Tew, Esq.
Attorneys for Plaintiffs

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE


Pursuant to NRCP 5(b), I hereby certify that I am an employee of Robertson, Johnson, Miller & Williamson, 50 West Liberty Street, Suite 600, Reno, Nevada 89501, over the age of 18, and not a party within this action. I further certify that on the 27th day of December, 2018, I caused to be deposited in the U.S. Mail, first-class postage fully prepaid the foregoing **MOTION TO SUBSTITUTE RECEIVER** with the Clerk of the Court by using the ECF system which served the following parties electronically:

H. Stan Johnson, Esq.
Steven B. Cohen, Esq.
Cohen-Johnson, LLC
255 E. Warm Springs Road, Suite 100
Las Vegas, NV 89119
Facsimile: (702) 823-3400
Email: sjohnson@cohenjohnson.com
Attorneys for Defendants

Jeffrey L. Hartman, Esq.
Hartman & Hartman
510 W. Plumb Lane, Suite B
Reno, NV 89509
Facsimile: (775) 324-1818
Email: notices@banhkruptcyreno.com
Attorneys for Receiver

I further certify that on the 27th day of December, 2018, I caused to be hand-delivered, a true and correct copy of the foregoing **MOTION TO SUBSTITUTE RECEIVER**, addressed to the following:

Gayle A. Kern, Esq.
Kern & Associates, Ltd.
5421 Kietzke Lane, Suite 200
Reno, NV 89511
Facsimile: (775) 324-6173
Email: gaylekern@kernltd.com
Attorneys for Defendants


An Employee of Robertson, Johnson,
Miller & Williamson

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT INDEX

Ex. No.	Description	Pages
1	Correspondence from Defendants to Plaintiffs	4
2	Sample monthly rental statements from Defendants to Plaintiffs	9
3	Email communication from James S. Proctor	5
4	Email communication from James S. Proctor to Plaintiffs' counsel	2
5	Curriculum vitae of Richard Teichner	7
6	Declaration of Jarrad C. Miller. Esq.	2

EXHIBIT “1”

EXHIBIT “1”

EXHIBIT “1”



July 19, 2016

Lee VANDERBOKKE
1181 Dutch Hollow Tr
Reno, NV 89523

Re: Unit 2385

Dear Lee VANDERBOKKE,

We are writing you this letter to inform you that on May 9th 2016 the Court dismissed the Thomas v. MEI-GSR Holdings case (CV12 -02222), which was pending in Department 10 of the Second Judicial District Court for Washoe County. The Grand Sierra Resort and Casino ("GSR") filed a Motion to Dismiss for Lack of Subject Matter Jurisdiction. The Court found it did lack jurisdiction to hear the case and granted the motion to dismiss.

Since the case has been dismissed, it is the GSR's position that fees and expenses due under the applicable agreements between the GSR, the Home Owners' Association and the unit owners that have not been paid because of prior Court rulings are now due and payable.

In order to assist you in understanding which fees or expenses have not been previously paid, the GSR has put together the attached spreadsheet that serves to identify (i) gross revenues received, (ii) expenses and fees due, and (iii) payments between the parties, for the period beginning April 2011 through February 2016. In addition, we are also including the statement for March, which reflects this reconciliation. April and May statements will be forthcoming.

If you are an owner with a balance that is due, please contact the GSR at the following number (775) 789-2314 and leave a message. We will then get back to you, so that arrangements can be made for payment.

If you believe that the amounts are in error or if you have any questions with respect to the spreadsheet, please contact the GSR at the number above, and we will do our best to rectify any mistakes and answer your questions.

As we hope you have seen these past five years, current ownership is committed to making the GSR the best property in Northern Nevada. To date, GSR has undergone \$100 million in renovations. We strongly believe that it has been this stewardship that has help turn around a property that was once on the verge of bankruptcy and/or shutting down. However, in order to ensure that the property continues to go in the right direction, we need your commitment that you will abide by the terms of your agreements. We look forward to working with you.

Sincerely,

Grand Sierra Resort and Casino



Total Summary
For all Units Owned

Net Due to / (from) Owner: \$ (16,322.30)

Revenue Calculation										Contracted Hotel Fees										Receivable Calculation									
Year Month	# of Nights	Gross Revenue	Deduct Daily	Revenue Split	Owner Revenue	SFU	Hotel Expense	Deep Cleaning	SFU Reserve	Hotel Reserve	FEE Reserve	Total Contracted	Statement Adjustments	Additional Payment by Owner	Due To/ From Owner	Balance from Previous Month	Previous Amount Paid To Owner	Remaining Due To/ From Owner											
2011 April	31	2,725.76	(585.76)	1,070.00	1,070.00	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	434.44	759.54	(267.67)	(573.04)	(267.67)											
May	46	4,991.00	(969.78)	2,008.61	2,008.61	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	759.54	(267.67)	(573.04)	(267.67)											
June	20	1,907.84	(386.78)	760.53	760.53	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(488.54)	(183.86)	(183.86)	(183.86)											
July	15	268.56	(67.14)	201.42	201.42	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(1,235.07)	(183.86)	(183.86)	(183.86)											
August	20	223.80	(223.80)	-	-	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	854.50	(1,908.07)	(1,908.07)	(1,908.07)											
September	5	89.52	-	-	-	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	67.14	(1,053.57)	(1,053.57)	(1,053.57)											
October	6	67.14	-	-	-	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	426.18	(986.43)	(986.43)	(986.43)											
November	3	-	-	-	-	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	44.76	(2,110.20)	(2,110.20)	(2,110.20)											
December	0	-	-	-	-	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	1,258.03	(1,684.02)	(1,684.02)	(1,684.02)											
2012 January	2	-	-	-	-	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(1,213.29)	(1,689.26)	(1,689.26)	(1,689.26)											
February	4	44.76	-	-	-	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(1,179.34)	(2,852.55)	(2,852.55)	(2,852.55)											
March	19	22.38	-	-	-	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(1,134.58)	(4,031.89)	(4,031.89)	(4,031.89)											
April	12	-	-	-	-	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(1,156.96)	(5,166.47)	(5,166.47)	(5,166.47)											
May	35	3,178.76	(783.30)	835.20	835.20	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(1,447.90)	(6,323.43)	(6,323.43)	(6,323.43)											
June	40	3,459.22	(895.20)	1,282.01	1,282.01	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	132.56	(7,771.33)	(7,771.33)	(7,771.33)											
July	33	3,112.10	(738.54)	1,186.78	1,186.78	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	7.44	(7,512.35)	(7,512.35)	(7,512.35)											
August	35	3,876.00	(783.30)	1,546.35	1,546.35	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	367.01	(7,514.91)	(7,514.91)	(7,514.91)											
September	43	3,543.70	(962.34)	1,290.68	1,290.68	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	111.34	(7,147.90)	(7,147.90)	(7,147.90)											
October	32	2,268.04	(716.16)	775.94	775.94	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(403.40)	(7,086.56)	(7,086.56)	(7,086.56)											
November	39	3,129.71	(872.82)	1,128.45	1,128.45	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(50.90)	(7,439.96)	(7,439.96)	(7,439.96)											
December	41	2,807.48	(917.58)	944.95	944.95	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(332.13)	(7,490.86)	(7,490.86)	(7,490.86)											
2013 January	41	3,188.45	(917.58)	1,135.44	1,135.44	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(141.65)	(7,822.99)	(7,822.99)	(7,822.99)											
February	36	2,957.03	(850.44)	1,053.30	1,053.30	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(123.79)	(8,188.42)	(8,188.42)	(8,188.42)											
March	31	3,611.00	(693.78)	1,458.61	1,458.61	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	181.55	(8,006.89)	(8,006.89)	(8,006.89)											
April	35	3,681.10	(783.30)	1,448.90	1,448.90	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	171.82	(8,006.89)	(8,006.89)	(8,006.89)											
May	40	4,135.73	(895.20)	1,620.27	1,620.27	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	343.19	(7,885.07)	(7,885.07)	(7,885.07)											
June	48	4,568.03	(1,074.24)	1,746.90	1,746.90	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	469.82	(7,491.98)	(7,491.98)	(7,491.98)											
July	41	3,865.45	(917.58)	1,473.93	1,473.93	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	196.85	(7,022.07)	(7,022.07)	(7,022.07)											
August	37	4,241.75	(828.06)	1,706.85	1,706.85	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	429.77	(6,875.32)	(6,875.32)	(6,875.32)											
September	36	3,238.39	(805.68)	1,213.86	1,213.86	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(63.23)	(6,395.46)	(6,395.46)	(6,395.46)											
October	41	3,165.46	(917.58)	1,123.94	1,123.94	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(153.14)	(6,458.68)	(6,458.68)	(6,458.68)											
November	35	2,456.89	(783.30)	836.80	836.80	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(440.29)	(6,511.82)	(6,511.82)	(6,511.82)											
December	36	2,021.40	(808.68)	607.86	607.86	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(660.59)	(7,052.11)	(7,052.11)	(7,052.11)											
2014 January	23	1,647.46	(514.74)	566.36	566.36	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(722.09)	(7,773.70)	(7,773.70)	(7,773.70)											
February	41	3,320.66	(917.58)	1,201.54	1,201.54	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(85.94)	(8,654.79)	(8,654.79)	(8,654.79)											
March	27	2,311.56	(604.26)	853.85	853.85	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(334.60)	(8,541.70)	(8,541.70)	(8,541.70)											
April	26	3,097.95	(581.88)	1,258.04	1,258.04	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(30.42)	(8,976.50)	(8,976.50)	(8,976.50)											
May	45	3,385.63	(1,007.10)	1,189.27	1,189.27	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(99.18)	(9,006.72)	(9,006.72)	(9,006.72)											
June	43	4,361.57	(962.34)	1,699.62	1,699.62	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	411.17	(9,105.90)	(9,105.90)	(9,105.90)											
July	48	4,101.72	(1,074.24)	1,513.74	1,513.74	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	235.29	(8,694.73)	(8,694.73)	(8,694.73)											
August	47	4,620.48	(1,051.86)	1,784.31	1,784.31	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	495.86	(8,489.44)	(8,489.44)	(8,489.44)											
September	34	3,060.22	(760.92)	1,149.65	1,149.65	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(136.80)	(7,973.58)	(7,973.58)	(7,973.58)											
October	46	3,083.00	(1,029.48)	1,026.76	1,026.76	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(281.69)	(8,112.38)	(8,112.38)	(8,112.38)											
November	45	3,122.01	(1,007.10)	1,057.45	1,057.45	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(231.00)	(8,605.07)	(8,605.07)	(8,605.07)											
December	45	3,166.58	(1,007.10)	1,289.74	1,289.74	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	1.49	(8,603.58)	(8,603.58)	(8,603.58)											
2015 January	45	3,511.18	(962.34)	1,294.74	1,294.74	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(468.45)	(8,627.41)	(8,627.41)	(8,627.41)											
February	30	2,451.00	(873.06)	889.80	889.80	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	188.73	(9,035.86)	(9,035.86)	(9,035.86)											
March	37	3,802.02	(821.06)	1,486.98	1,486.98	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	461.17	(9,066.86)	(9,066.86)	(9,066.86)											
April	39	4,391.66	(827.82)	1,759.42	1,759.42	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(48.81)	(8,794.42)	(8,794.42)	(8,794.42)											
May	40	3,544.07	(895.20)	1,249.44	1,249.44	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	950.11	(9,304.40)	(9,304.40)	(9,304.40)											
June	50	5,158.08	(1,119.00)	1,352.96	1,352.96	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	54.71	(8,354.29)	(8,354.29)	(8,354.29)											
July	46	3,735.40	(1,029.48)	1,287.29	1,287.29	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	489.04	(9,255.59)	(9,255.59)	(9,255.59)											
August	42	4,693.58	(1,119.00)	1,787.29	1,787.29	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	412.27	(11,113.34)	(11,113.34)	(11,113.34)											
September	38	4,361.00	(939.96)	1,710.52	1,710.52	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	(348.57)	(12,861.57)	(12,861.57)	(12,861.57)											
October	42	5,059.48	(760.92)	1,449.28	1,449.28	(447.33)	-	(100.00)	(348.15)	(35.78)	(317.81)	(1,249.07)	-	-	130.97	(14,453.10)	(145												

Net Due to/(from) Owner: \$ (5,953.35)

Revenue Calculation										Contracted Hotel Fees										Receivable Calculation									
Year Month	# of Nights	Gross Revenue	Deduct Daily Rate	Revenue Split	Owner Revenue	SFU Expense	Hotel Expense	Deep Cleaning	SFU Reserve	Hotel Reserve	FEE	Total Contracted	Statement Adjustments	Additional Payment by Owner	Due To/ From	Balance Forward	Previous Month	Previous Amount Paid to Owner	Remaining Due To/ From										
2011 April	17	1,386.76	(292.88)	1,659.27	546.94	(124.04)	-	(50.00)	(183.64)	(20.32)	(180.48)	(668.48)	(37.53)	434.44	255.27	-	-	-	(513.04)	(1267.87)									
May	25	2,869.00	(524.46)	1,169.27	1,689.27	(124.04)	-	(50.00)	(183.64)	(20.32)	(180.48)	(668.48)	-	-	-	-	-	-	(183.86)	(183.86)									
June	14	1,287.84	(235.56)	516.94	1,169.27	(124.04)	-	(50.00)	(183.64)	(20.32)	(180.48)	(668.48)	-	-	-	-	-	-	(171.54)	(355.40)									
July	1	-	(22.38)	-	(22.38)	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	(690.54)	(355.40)									
August	5	89.52	(22.38)	-	67.14	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	883.00	-	-	-	(1,045.94)	(753.96)									
September	7	67.14	(89.52)	-	(22.38)	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	690.54	-	-	-	(1,045.94)	(753.96)									
October	3	44.76	-	-	44.76	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	757.68	-	-	-	(1,387.36)	(1,290.70)									
November	3	67.14	-	-	67.14	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	690.54	-	-	-	(1,290.70)	(1,290.70)									
December	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-									
2012 January	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-									
February	1	-	-	-	-	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	(668.48)	-	-	-	(1,290.70)	(1,290.70)									
March	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-									
April	5	-	-	-	-	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	(668.48)	-	-	-	(1,290.70)	(1,290.70)									
May	4	-	(89.52)	-	(89.52)	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
June	20	2,118.00	(447.60)	835.20	835.20	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
July	23	2,082.22	(514.24)	783.74	783.74	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
August	21	2,183.60	(469.98)	856.81	856.81	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
September	23	2,606.00	(514.74)	1,045.63	1,045.63	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
October	22	1,792.00	(447.36)	649.82	649.82	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
November	19	1,198.80	(445.22)	384.79	384.79	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
December	35	2,183.46	(559.50)	811.98	811.98	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
2013 January	25	1,532.38	(559.50)	486.74	486.74	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
February	23	2,220.45	(514.74)	852.86	852.86	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
March	21	1,817.53	(469.98)	673.78	673.78	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
April	17	1,599.00	(380.46)	789.27	789.27	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
May	24	2,259.10	(537.12)	860.99	860.99	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
June	28	1,973.73	(526.64)	1,123.55	1,123.55	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
July	24	2,127.33	(537.12)	600.06	600.06	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
August	24	2,580.96	(537.12)	1,026.92	1,026.92	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
September	22	2,678.85	(492.36)	1,093.25	1,093.25	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
October	23	2,300.00	(514.74)	892.63	892.63	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
November	26	2,105.00	(581.88)	761.55	761.55	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
December	17	1,486.35	(380.46)	552.85	552.85	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
2014 January	19	821.52	(425.22)	198.15	198.15	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
February	14	1,060.34	(313.32)	373.51	373.51	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
March	22	2,002.56	(492.36)	755.50	755.50	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
April	15	1,327.47	(335.70)	493.39	493.39	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
May	13	1,500.00	(280.94)	604.53	604.53	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
June	21	1,566.00	(469.98)	548.01	548.01	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
July	23	2,013.25	(514.74)	749.26	749.26	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
August	27	2,177.77	(504.26)	786.76	786.76	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
September	26	2,669.34	(581.88)	1,045.73	1,045.73	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
October	25	1,473.64	(335.70)	566.97	566.97	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
November	13	1,514.02	(514.74)	513.14	513.14	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
December	20	1,394.92	(467.60)	473.66	473.66	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
2015 January	26	2,148.88	(581.88)	785.50	785.50	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
February	21	1,399.38	(425.22)	487.08	487.08	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
March	10	897.00	(273.80)	336.60	336.60	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
April	17	2,097.92	(380.46)	858.73	858.73	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
May	19	2,423.70	(445.22)	599.24	599.24	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
June	22	2,072.86	(492.36)	790.25	790.25	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
July	23	3,021.86	(539.50)	1,231.18	1,231.18	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
August	22	2,271.30	(492.36)	889.47	889.47	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
September	24	2,865.64	(537.12)	1,164.26	1,164.26	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
October	24	2,607.00	(537.12)	1,034.94	1,034.94	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
November	17	1,489.90	(313.32)	578.29	578.29	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
December	24	2,116.88	(538.96)	788.96	788.96	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
2016 January	28	2,207.02	(564.42)	821.30	821.30	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									
February	27	2,024.40	(662.58)	680.91	680.91	(124.04)	-	(50.00)	(183.64)	-	(180.48)	(668.48)	-	-	-	-	-	-	-	-									



STEAKS, RESORT AND CASINO

Room: 2385
Owner: VANDERBOKKE
Type: Grand 2-B

Net Due to / (from) Owner: \$ (10,368.96)

Revenue Calculation										Contracted Hotel Fees										Rechargeable Calculation									
Year Month	# of Nights	Gross Revenue	Deduct Daily Use	Revenue Split	Owner Revenue	SFU Expense	Hotel Expense	Deep Cleaning	SFU Reserve	Hotel Reserve	FTE Reserve	Total	Statement Adjustments	Additional Payment by Owner	Due To/ From Owner	Balance from Previous Month	Previous Amount Paid to Owner	Remaining Due To/ From Owner											
2011 April	14	1,390.00	(292.88)	523.06	523.06	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	37.35	-	(0.00)	(0.00)	(278.75)	(0.00)											
May	21	2,118.00	(439.32)	839.34	839.34	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
June	6	620.00	(132.82)	243.59	243.59	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
July	0	-	-	-	-	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
August	10	1,790.04	(44.76)	-	-	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
September	13	156.66	(34.28)	-	-	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
October	3	44.76	-	-	-	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
November	2	-	-	-	-	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
December	2	-	-	-	-	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
2012 January	0	-	-	-	-	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
February	1	-	-	-	-	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
March	4	44.76	-	-	-	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
April	14	22.38	-	-	-	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
May	8	-	(179.04)	-	-	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
June	15	1,060.76	(335.70)	-	-	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
July	17	1,377.00	(380.46)	458.27	458.27	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
August	12	928.50	(268.56)	329.97	329.97	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
September	12	1,270.00	(268.56)	500.72	500.72	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
October	21	1,751.70	(469.98)	640.86	640.86	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
November	13	1,069.24	(280.94)	389.15	389.15	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
December	14	946.25	(313.32)	316.47	316.47	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
2013 January	16	1,274.50	(358.08)	458.21	458.21	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
February	18	968.00	(402.84)	282.58	282.58	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
March	17	1,159.50	(380.46)	379.52	379.52	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
April	14	1,652.00	(313.32)	669.34	669.34	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
May	11	1,422.00	(246.18)	587.91	587.91	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
June	12	1,262.00	(268.56)	496.72	496.72	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
July	24	2,890.80	(537.12)	1,146.64	1,146.64	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
August	17	1,274.47	(380.46)	447.01	447.01	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
September	15	1,562.90	(335.70)	613.60	613.60	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
October	13	933.39	(290.94)	321.23	321.23	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
November	15	1,060.46	(335.70)	362.38	362.38	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
December	18	970.54	(402.84)	283.85	283.85	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
2014 January	17	1,199.88	(380.46)	409.71	409.71	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
February	9	587.12	(201.42)	192.85	192.85	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
March	19	1,317.70	(425.22)	446.24	446.24	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
April	12	985.49	(268.56)	360.47	360.47	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
May	13	1,597.95	(290.94)	653.51	653.51	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
June	24	1,819.63	(537.12)	641.26	641.26	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
July	20	2,348.32	(447.60)	950.96	950.96	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
August	21	1,923.95	(469.98)	726.99	726.99	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
September	21	1,951.14	(469.98)	740.58	740.58	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
October	19	1,586.58	(425.22)	580.68	580.68	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
November	23	1,541.98	(514.74)	513.62	513.62	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
December	25	1,272.09	(559.50)	583.80	583.80	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
2015 January	19	1,457.70	(425.22)	516.24	516.24	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
February	24	2,113.80	(537.12)	787.34	787.34	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
March	20	1,554.00	(447.60)	553.20	553.20	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
April	20	1,704.10	(447.60)	628.25	628.25	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
May	18	1,967.96	(447.60)	760.18	760.18	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
June	20	1,967.96	(447.60)	760.18	760.18	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
July	18	1,321.21	(402.84)	459.13	459.13	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
August	25	2,496.22	(559.50)	968.36	968.36	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
September	26	1,464.10	(537.12)	463.49	463.49	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
October	18	1,827.94	(537.12)	623.03	623.03	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
November	21	1,589.58	(447.60)	570.95	570.95	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
December	22	1,859.40	(539.88)	659.76	659.76	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
2016 January	30	1,666.78	(613.50)	526.64	526.64	(159.29)	-	(150.00)	(164.51)	(15.46)	(137.33)	(580.59)	-	-	(0.00)	(0.00)	(278.75)	(0.00)											
February	24	1,684.30	(588.96)	547.67	547.67	(159.29)	-	(150.00)	(164.514																				

EXHIBIT “2”

EXHIBIT “2”

EXHIBIT “2”

THE SUMMIT

AT GRAND SIERRA RESORT

OWNER ACCOUNT STATEMENT

Account Number: 50249
 Unit Number: 2157
 Invoice Date: February 19, 2018
 Period: 01/01/2018 - 01/31/2018
 Balance (to)/ from Owner: \$21,948.10

DARLEEN LINDGREN
 8001 CHESSHIRE LANE NORTH

****PAYABLE UPON RECEIPT****

MAPLE GROVE, MN 55311

Reservation Detail								
Arrival	Departure	Wing	Room	Nights	Gross Revenue	Daily Use Fee	Revenue Split	(Room Revenue)/ Fees
01/01/2018	01/02/2018	SH	2157	1	\$70.00	\$31.35	\$19.33	\$(19.33)
01/02/2018	01/04/2018	SH	2157	2	\$100.00	\$62.70	\$18.65	\$(18.65)
01/04/2018	01/06/2018	SH	2157	2	\$188.00	\$62.70	\$62.65	\$(62.65)
01/06/2018	01/08/2018	SH	2157	2	\$149.00	\$62.70	\$43.15	\$(43.15)
01/08/2018	01/20/2018	SH	2157	12	\$888.40	\$376.20	\$256.10	\$(256.10)
01/17/2018	01/18/2018	SH	2157	1	\$(280.00)	\$0.00	\$(140.00)	\$140.00
01/20/2018	01/21/2018	SH	2157	1	\$90.00	\$31.35	\$29.33	\$(29.33)
01/21/2018	01/27/2018	SH	2157	6	\$432.00	\$188.10	\$121.95	\$(121.95)
01/27/2018	01/28/2018	SH	2157	1	\$90.00	\$31.35	\$29.33	\$(29.33)
01/28/2018	01/30/2018	SH	2157	2	\$103.50	\$62.70	\$20.40	\$(20.40)
01/30/2018	02/01/2018	SH	2157	2	\$152.00	\$62.70	\$44.65	\$(44.65)
TOTAL				32	\$1,982.90	\$971.85	\$505.53	\$(505.53)

Misc. Credit/Expenses	
Description	Amount

Statement Summary	
(Room Revenue) / Fees:	\$(505.53)
Contracted Hotel Fees *:	\$835.73
Misc. (Credits) / Expenses:	\$0.00
Previous Balance:	\$21,617.90
Payment Received:	\$0.00
Net Due to Owner:	\$0.00
Net Due from Owner:	\$21,948.10

* This is the Hotel Expenses (Hotel, Shared Facility and Cleaning Fee) and Hotel Reserves (Hotel, Shared Facility, FF&E).
 Please refer to CC&R Article 6 and the Unit Maintenance Agreement Schedule A for definitions of these Expenses and Reserves.



OWNER ACCOUNT STATEMENT

Account Number: 50027
Unit Number: 2181
Invoice Date: June 19, 2018
Period: 05/01/2018 - 05/31/2018
Balance (to)/ from Owner: \$22,520.22

DUANE WINDHORST
719 RIVER BLUFF RD. SE

****PAYABLE UPON RECEIPT****

MAZEPPA, MN 55956-3011

Reservation Detail								
Arrival	Departure	Wing	Room	Nights	Gross Revenue	Daily Use Fee	Revenue Split	(Room Revenue) / Fees
05/01/2018	05/02/2018	SH	2181	1	\$70.00	\$31.18	\$19.41	\$(19.41)
05/03/2018	05/05/2018	SH	2181	2	\$116.00	\$62.36	\$26.82	\$(26.82)
05/05/2018	05/06/2018	SH	2181	1	\$70.00	\$31.18	\$19.41	\$(19.41)
05/10/2018	05/13/2018	SH	2181	3	\$467.00	\$93.54	\$186.73	\$(186.73)
05/13/2018	05/14/2018	SH	2181	1	\$65.00	\$31.18	\$16.91	\$(16.91)
05/15/2018	05/16/2018	SH	2181	1	\$70.00	\$31.18	\$19.41	\$(19.41)
05/16/2018	05/17/2018	SH	2181	1	\$70.00	\$31.18	\$19.41	\$(19.41)
05/17/2018	05/18/2018	SH	2181	1	\$65.00	\$31.18	\$16.91	\$(16.91)
05/18/2018	05/20/2018	SH	2181	2	\$140.00	\$62.36	\$38.82	\$(38.82)
05/20/2018	05/21/2018	SH	2181	1	\$67.32	\$31.18	\$18.07	\$(18.07)
05/21/2018	05/27/2018	SH	2181	5	\$160.78	\$124.72	\$18.03	\$(18.03)
05/24/2018	05/28/2018	SH	2181	4	\$438.00	\$124.72	\$156.64	\$(156.64)
05/28/2018	05/29/2018	SH	2181	1	\$36.72	\$31.18	\$2.77	\$(2.77)
05/29/2018	05/30/2018	SH	2181	1	\$37.00	\$31.18	\$2.91	\$(2.91)
05/30/2018	06/01/2018	SH	2181	2	\$100.00	\$62.36	\$18.82	\$(18.82)
TOTAL				27	\$1,972.82	\$810.68	\$581.07	\$(581.07)

Misc. Credit/Expenses	
Description	Amount
2017 True-up	\$27.26

Please Make Checks Payable to:

GRAND SIERRA RESORT
ATTN: ACCOUNTS RECEIVABLE
2500 EAST SECOND ST.
RENO, NV 89595

R.App. 000489

Statement Summary

(Room Revenue) / Fees:	\$(581.07)
Contracted Hotel Fees *:	\$647.85
Misc. (Credits) / Expenses:	\$27.26
Previous Balance:	\$22,426.18
Payment Received:	\$0.00
<hr/>	
Net Due to Owner:	\$0.00
Net Due from Owner:	\$22,520.22

* This is the Hotel Expenses (Hotel, Shared Facility and Cleaning Fee) and Hotel Reserves (Hotel, Shared Facility, FF&E).
Please refer to CC&R Article 6 and the Unit Maintenance Agreement Schedule A for definitions of these Expenses and Reserves.

Please Make Checks Payable to:

GRAND SIERRA RESORT
ATTN: ACCOUNTS RECEIVABLE
2500 EAST SECOND ST.
RENO, NV 89595



OWNER ACCOUNT STATEMENT

Account Number: 50440
 Unit Number: 2371
 Invoice Date: June 19, 2018
 Period: 05/01/2018 - 05/31/2018
 Balance (to)/ from Owner: \$12,703.96

WILLIAM MINER
 15075 MURPHY AVENUE

****PAYABLE UPON RECEIPT****

SAN MARTIN, CA 95046

Arrival	Departure	Wing	Room	Nights	Gross Revenue	Daily Use Fee	Revenue Split	(Room Revenue) / Fees
05/01/2018	05/02/2018	SH	2371	1	\$70.00	\$37.42	\$16.29	\$(16.29)
05/02/2018	05/03/2018	SH	2371	1	\$37.42	\$37.42	\$0.00	\$0.00
05/03/2018	05/04/2018	SH	2371	1	\$78.00	\$37.42	\$20.79	\$(20.79)
05/04/2018	05/06/2018	SH	2371	2	\$180.00	\$74.84	\$52.58	\$(52.58)
05/06/2018	05/07/2018	SH	2371	1	\$49.00	\$37.42	\$5.79	\$(5.79)
05/07/2018	05/08/2018	SH	2371	1	\$87.00	\$37.42	\$14.79	\$(14.79)
05/08/2018	05/09/2018	SH	2371	1	\$70.00	\$37.42	\$16.29	\$(16.29)
05/09/2018	05/14/2018	SH	2371	5	\$370.00	\$187.10	\$91.45	\$(91.45)
05/14/2018	05/16/2018	SH	2371	2	\$74.84	\$74.84	\$0.00	\$0.00
05/16/2018	05/18/2018	SH	2371	2	\$150.00	\$74.84	\$37.58	\$(37.58)
05/18/2018	05/20/2018	SH	2371	2	\$100.00	\$74.84	\$12.58	\$(12.58)
05/20/2018	05/22/2018	SH	2371	2	\$74.84	\$74.84	\$0.00	\$0.00
05/22/2018	05/23/2018	SH	2371	1	\$37.42	\$37.42	\$0.00	\$0.00
05/23/2018	05/24/2018	SH	2371	1	\$69.00	\$37.42	\$15.79	\$(15.79)
05/24/2018	05/25/2018	SH	2371	1	\$65.00	\$37.42	\$13.79	\$(13.79)
05/25/2018	05/26/2018	SH	2371	1	\$70.00	\$37.42	\$16.29	\$(16.29)
05/26/2018	05/27/2018	SH	2371	1	\$259.00	\$37.42	\$110.79	\$(110.79)
05/27/2018	05/28/2018	SH	2371	1	\$239.00	\$37.42	\$100.79	\$(100.79)
05/28/2018	05/30/2018	SH	2371	2	\$100.00	\$74.84	\$12.58	\$(12.58)
05/30/2018	06/01/2018	SH	2371	2	\$150.00	\$74.84	\$37.58	\$(37.58)
TOTAL				31	\$2,311.52	\$1,160.02	\$575.75	\$(575.75)

Description	Amount
2017 True-up	\$35.81

Please Make Checks Payable to:

GRAND SIERRA RESORT
 ATTN: ACCOUNTS RECEIVABLE
 2500 EAST SECOND ST.
 RENO, NV 89595

Statement Summary

(Room Revenue) / Fees:	\$(575.75)
Contracted Hotel Fees *:	\$835.73
Misc. (Credits) / Expenses:	\$36.81
Previous Balance:	\$12,408.17
Payment Received:	\$0.00
<hr/>	
Net Due to Owner:	\$0.00
Net Due from Owner:	\$12,703.96

* This is the Hotel Expenses (Hotel, Shared Facility and Cleaning Fee) and Hotel Reserves (Hotel, Shared Facility, FF&E)
Please refer to CC&R Article 6 and the Unit Maintenance Agreement Schedule A for definitions of these Expenses and Reserves.

Please Make Checks Payable to:

GRAND SIERRA RESORT
ATTN: ACCOUNTS RECEIVABLE
2500 EAST SECOND ST.
RENO, NV 89595



OWNER ACCOUNT STATEMENT

Account Number: 50023
 Unit Number: 1728
 Invoice Date: May 21, 2018
 Period: 04/01/2018 - 04/30/2018
 Balance (to)/ from Owner: \$12,323.05

MARY KOSSICK
 P.O. BOX 31753

****PAYABLE UPON RECEIPT****

SAN FRANCISCO, CA 94131

Reservation Detail								
Arrival	Departure	Wing	Room	Nights	Gross Revenue	Daily Use Fee	Revenue Split	(Room Revenue) / Fees
04/01/2018	04/02/2018	SH	1728	1	\$70.00	\$37.42	\$16.29	\$(16.29)
04/02/2018	04/04/2018	SH	1728	2	\$100.00	\$74.84	\$12.58	\$(12.58)
04/04/2018	04/06/2018	SH	1728	2	\$225.00	\$74.84	\$75.08	\$(75.08)
04/06/2018	04/08/2018	SH	1728	2	\$140.00	\$74.84	\$32.58	\$(32.58)
04/08/2018	04/14/2018	SH	1728	6	\$486.00	\$224.52	\$130.74	\$(130.74)
04/14/2018	04/15/2018	SH	1728	1	\$68.00	\$37.42	\$15.29	\$(15.29)
04/15/2018	04/16/2018	SH	1728	1	\$59.20	\$37.42	\$10.89	\$(10.89)
04/16/2018	04/17/2018	SH	1728	1	\$75.00	\$37.42	\$18.79	\$(18.79)
04/17/2018	04/27/2018	SH	1728	10	\$630.00	\$374.20	\$127.90	\$(127.90)
04/27/2018	04/29/2018	SH	1728	2	\$180.00	\$74.84	\$52.58	\$(52.58)
04/29/2018	05/01/2018	SH	1728	2	\$150.00	\$74.84	\$37.58	\$(37.58)
TOTAL				30	\$2,183.20	\$1,122.60	\$530.30	\$(530.30)

Misc. Credit/Expenses	
Description	Amount
2017 True-up	\$36.21

Please Make Checks Payable to:

GRAND SIERRA RESORT
 ATTN: ACCOUNTS RECEIVABLE
 2500 EAST SECOND ST.
 RENO, NV 89595

Statement Summary

(Room Revenue) / Fees:	\$(530.30)
Contracted Hotel Fees *:	\$844.28
Misc. (Credits) / Expenses:	\$36.21
Previous Balance:	\$11,972.86
Payment Received:	\$0.00
<hr/>	
Net Due to Owner:	\$0.00
Net Due from Owner:	\$12,323.05

* This is the Hotel Expenses (Hotel, Shared Facility and Cleaning Fee) and Hotel Reserves (Hotel, Shared Facility, FF&E).
Please refer to CC&R Article 6 and the Unit Maintenance Agreement Schedule A for definitions of these Expenses and Reserves.

Please Make Checks Payable to:

GRAND SIERRA RESORT
ATTN: ACCOUNTS RECEIVABLE
2500 EAST SECOND ST.
RENO, NV 89595

R.App. 000494



OWNER ACCOUNT STATEMENT

Account Number: 50628
 Unit Number: 2385
 Invoice Date: September 19, 2017
 Period: 08/01/2017 - 08/31/2017
 Balance (to)/ from Owner: \$12,831.53

LEE VANDERBOKKE
 1181 DUTCH HOLLOW TRAIL

****PAYABLE UPON RECEIPT****

RENO, NV 89523

Reservation Detail								
Arrival	Departure	Wing	Room	Nights	Gross Revenue	Daily Use Fee	Revenue Split	(Room Revenue) / Fees
08/01/2017	08/04/2017	SH	2385	3	\$300.00	\$78.36	\$110.82	\$(110.82)
08/04/2017	08/06/2017	SH	2385	2	\$237.00	\$52.24	\$92.38	\$(92.38)
08/06/2017	08/09/2017	SH	2385	3	\$253.00	\$78.36	\$87.32	\$(87.32)
08/09/2017	08/10/2017	SH	2385	1	\$70.00	\$26.12	\$21.94	\$(21.94)
08/10/2017	08/13/2017	SH	2385	3	\$629.94	\$78.36	\$275.79	\$(275.79)
08/13/2017	08/15/2017	SH	2385	2	\$60.00	\$52.24	\$3.88	\$(3.88)
08/15/2017	08/19/2017	SH	2385	4	\$324.80	\$104.48	\$110.16	\$(110.16)
08/18/2017	08/19/2017	SH	2385	1	\$(9.00)	\$0.00	\$(4.50)	\$4.50
08/19/2017	08/21/2017	SH	2385	2	\$120.00	\$52.24	\$33.88	\$(33.88)
08/21/2017	08/22/2017	SH	2385	1	\$69.00	\$26.12	\$21.44	\$(21.44)
08/22/2017	08/24/2017	SH	2385	2	\$178.00	\$52.24	\$62.88	\$(62.88)
08/24/2017	08/27/2017	SH	2385	3	\$357.00	\$78.36	\$139.32	\$(139.32)
08/27/2017	08/29/2017	SH	2385	2	\$60.00	\$52.24	\$3.88	\$(3.88)
08/29/2017	09/01/2017	SH	2385	3	\$177.00	\$78.36	\$49.32	\$(49.32)
TOTAL				32	\$2,826.74	\$809.72	\$1,008.51	\$(1,008.51)

Misc. Credit/Expenses	
Description	Amount
2016 True-up	\$480.05

Please Make Checks Payable to:

GRAND SIERRA RESORT
 ATTN: ACCOUNTS RECEIVABLE
 2500 EAST SECOND ST.
 RENO, NV 89595

Statement Summary

(Room Revenue) / Fees:	\$(1,008.51)
Contracted Hotel Fees *:	\$600.03
Misc. (Credits) / Expenses:	\$480.05
Previous Balance:	\$12,759.96
Payment Received:	\$0.00
<hr/>	
Net Due to Owner:	\$0.00
Net Due from Owner:	\$12,831.53

* This is the Hotel Expenses (Hotel, Shared Facility and Cleaning Fee) and Hotel Reserves (Hotel, Shared Facility, FF&E).
Please refer to CC&R Article 6 and the Unit Maintenance Agreement Schedule A for definitions of these Expenses and Reserves.

Please Make Checks Payable to:

GRAND SIERRA RESORT
ATTN: ACCOUNTS RECEIVABLE
2500 EAST SECOND ST.
RENO, NV 89595

EXHIBIT “3”

EXHIBIT “3”

EXHIBIT “3”

Jarrad Miller

From: James S Proctor <jsp@madvantage.com>
Sent: Tuesday, March 13, 2018 9:00 AM
To: Jeffrey L. Hartman; Jarrad Miller
Cc: Jon Tew
Subject: RE: GSR

Jarrad,

I was going to respond later in the day, but since Jeff responded, let me further explain. I was approached by Ben Vega in June 2016 about the possibility of continuing the role in a monitoring capacity to ensure that the reporting and procedures would continue. Recognizing a possible conflict of interest, or at least the appearance of such, I consulted with Jeff Hartman. I was also somewhat suspicious that this could be a set-up. I made a proposal as to continue, with the procedures in place, recognizing some cost benefit to all the parties and possibly some good faith on the defendants' part. I never heard anything further; nothing one way or another, and let the matter drop. Obviously, if what you assert is correct the GSR had no intention of continuing the procedures and the reporting, and that the interest in my continuing was a red herring and possibly by design. I understand your position, and whatever works best for everyone.

Thank you,

James S. Proctor, CPA, CFE, CVA, CFF
jsp@MAdvantage.com
Meridian Advantage
Forensic Accounting-Litigation Support-Business Valuation
200 Ridge St., Suite 240
Reno, NV. 89501
Phone (775)323-2577 i
Fax (775)284-0987
Website: www.MAdvantage.com

CONFIDENTIALITY NOTICE

This message is intended for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us at the above address via U.S. Postal Service.



Please consider the environment before printing this email. Thank you!

From: Jeffrey L. Hartman <jlh@bankruptcyreno.com>
Sent: Tuesday, March 13, 2018 8:52 AM
To: Jarrad Miller <jarrad@nvlawyers.com>; James S Proctor <jsp@madvantage.com>
Cc: Jon Tew <jon@nvlawyers.com>
Subject: RE: GSR

Jarrad:

Obviously it would make sense to use Proctor because the expense of getting a new person up to speed will be significant.

It is my understanding – I could be wrong – but I believe Anne Hall is now general counsel for the GSR. I don't have any experience with her. With the Supreme Court decision it would be logical that GSR would want to bring the matter to an early resolution.

In any case, Jim is willing to step back in if the parties agree.

Jeff Hartman

From: Jarrad Miller <jarrad@nvlawyers.com>
Sent: Monday, March 12, 2018 5:38 PM
To: James S Proctor <jsp@madvantage.com>
Cc: Jon Tew <jon@nvlawyers.com>; Jeffrey L. Hartman <jlh@bankruptcyreno.com>
Subject: RE: GSR

James:

The monthly invoices issued after the dismissal seem to demonstrate that GSR quickly returned to its pattern of stealing from the Plaintiffs. First, it is likely that they have gone back to using false amounts for the claimed room rental rates on the Plaintiff invoices (the reported amounts don't match known room rental rates). Second, they have increased the Daily Use Fee to \$31.35 and the Contacted Hotel Fees. The result is that even with 25 nights plus of daily usage in a month, a Plaintiff can still owe, rather than receive, money at the end of the month.

Mr. Hartman has informed me that you were offered continued work/projects after the dismissal by the GSR. In light of GSR's offers, we have serious concerns. We know that the Plaintiffs will express concern and likely ask that we file a motion to change receiver.

Best regards,
Jarrad C. Miller, Esq.
Robertson, Johnson, Miller & Williamson
50 West Liberty Street, Suite 600
Reno, NV 89501
Telephone: (775) 329-5600
Facsimile: (775) 348-8300
Email: JARRAD@NVLAWYERS.COM
Website: www.NVLawyers.com

Important:

Please do not forward this e-mail without the expressed consent of the Author.

PERSONAL AND CONFIDENTIAL. This message originates from the law firm of Robertson, Johnson, Miller & Williamson. This message and any file(s) or attachment(s) transmitted with it are confidential, intended only for the named recipient, and may contain information that is a trade secret, proprietary, protected by the attorney work product doctrine, subject to the attorney-client privilege, or is otherwise protected against unauthorized use or disclosure. This message and any file(s) or attachment(s) transmitted with it are transmitted based on a reasonable expectation of privacy consistent with ABA Formal Opinion No. 99-413. Any disclosure, distribution, copying, or use of this information by anyone other than the intended recipient, regardless of address or routing, is strictly prohibited. If you receive this message in error, please advise the sender by immediate reply and delete the original message. Personal messages express only the view of the sender and are not attributable to Robertson, Johnson, Miller & Williamson. We advise you that any tax advice contained in this communication (including any attachments) is not intended to be used, and cannot be used, for purposes of (i) avoiding penalties imposed under the United States Internal Revenue Code or (ii) promoting, marketing or recommending to another person any tax-related matter addressed herein. TRANSMISSION OF THIS INFORMATION IS NOT INTENDED TO CREATE, AND RECEIPT DOES NOT CONSTITUTE, AN ATTORNEY-CLIENT RELATIONSHIP.

From: James S Proctor <jsp@madvantage.com>
Sent: Sunday, March 11, 2018 1:34 PM
To: Jarrad Miller <jarrad@nvlawyers.com>
Subject: GSR

Jarrad,

I understand that Jeff Hartman has communicated my willingness to recommence serving as Receiver in the GSR matter. As way of updating and possibly being involved again, do you know if the GSR was continuing with the procedures that we had put into place, and have you been receiving either the reports or some other type of reporting? I believe from what I've heard and seen, that almost everyone we had been dealing with are now gone. Please advise at your convenience.

Thanks,

James S. Proctor, CPA, CFE, CVA, CFF
jsp@MAdvantage.com
Meridian Advantage
Forensic Accounting-Litigation Support-Business Valuation
200 Ridge St., Suite 240
Reno, NV. 89501
Phone (775)323-2577
Fax (775)284-0987
Website: www.MAdvantage.com

CONFIDENTIALITY NOTICE

This message is intended for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us at the above address via U.S. Postal Service.



Please consider the environment before printing this email. Thank you!

Jarrad Miller

From: Jeffrey L. Hartman <jlh@bankruptcyreno.com>
Sent: Friday, March 09, 2018 11:29 AM
To: Jarrad Miller
Subject: RE: GSR Order

Jim is willing to get back in if asked. After the appeal, he was asked by GSR to continue doing some work but he declined.

Jeff Hartman

From: Jarrad Miller <jarrad@nvlawyers.com>
Sent: Tuesday, February 27, 2018 12:40 PM
To: Jeffrey L. Hartman <jlh@bankruptcyreno.com>; James S Proctor (jsp@madvantage.com) <jsp@madvantage.com>
Cc: Jon Tew <jon@nvlawyers.com>
Subject: RE: GSR Order

I suspect they will request *en banc* re-hearing and it will be denied. There was no dissent on the panel so GSR would need to convince all of the other justices to change the decision and the court declined to address the other 5 or so reasons that the statute was inapplicable in this case. A receiver will need to go back in as soon as the case is remanded to the district court. Given that it has been two years does James have an interest in continuing as the receiver? Should we locate another receiver?

Jarrad C. Miller, Esq.
Robertson, Johnson, Miller & Williamson
50 West Liberty Street, Suite 600
Reno, NV 89501
Telephone: (775) 329-5600
Facsimile: (775) 348-8300
Email: JARRAD@NVLAWYERS.COM
Website: www.NVLawyers.com

Important:

Please do not forward this e-mail without the expressed consent of the Author.

PERSONAL AND CONFIDENTIAL. This message originates from the law firm of Robertson, Johnson, Miller & Williamson. This message and any file(s) or attachment(s) transmitted with it are confidential, intended only for the named recipient, and may contain information that is a trade secret, proprietary, protected by the attorney work product doctrine, subject to the attorney-client privilege, or is otherwise protected against unauthorized use or disclosure. This message and any file(s) or attachment(s) transmitted with it are transmitted based on a reasonable expectation of privacy consistent with ABA Formal Opinion No. 99-413. Any disclosure, distribution, copying, or use of this information by anyone other than the intended recipient, regardless of address or routing, is strictly prohibited. If you receive this message in error, please advise the sender by immediate reply and delete the original message. Personal messages express only the view of the sender and are not attributable to Robertson, Johnson, Miller & Williamson. We advise you that any tax advice contained in this communication (including any attachments) is not intended to be used, and cannot be used, for purposes of (i) avoiding penalties imposed under the United States Internal Revenue Code or (ii) promoting, marketing or recommending to another person any tax-related matter addressed herein. TRANSMISSION OF THIS INFORMATION IS NOT INTENDED TO CREATE, AND RECEIPT DOES NOT CONSTITUTE, AN ATTORNEY-CLIENT RELATIONSHIP.

From: Jeffrey L. Hartman [<mailto:jlh@bankruptcyreno.com>]
Sent: Tuesday, February 27, 2018 10:50 AM

To: Jarrad Miller <jarrad@nvlawyers.com>; James S Proctor (jsp@madvantage.com) <jsp@madvantage.com>
Subject: RE: GSR Order

Jarrad:

Two questions:

Do you expect a request for *en banc* re-hearing?

What are the implications for the receivership?

Jeff Hartman

From: Jarrad Miller [mailto:jarrad@nvlawyers.com]

Sent: Tuesday, February 27, 2018 10:09 AM

To: Jeffrey L. Hartman <jlh@bankruptcyreno.com>; James S Proctor (jsp@madvantage.com) <jsp@madvantage.com>

Subject: FW: GSR Order

James and Jeff:

Not sure if you have seen the order yet.

Best regards,

Jarrad C. Miller, Esq.

Robertson, Johnson, Miller & Williamson

50 West Liberty Street, Suite 600

Reno, NV 89501

Telephone: (775) 329-5600

Facsimile: (775) 348-8300

Email: JARRAD@NVLAWYERS.COM

Website: www.NVLawyers.com

Important:

Please do not forward this e-mail without the expressed consent of the Author.

PERSONAL AND CONFIDENTIAL. This message originates from the law firm of Robertson, Johnson, Miller & Williamson. This message and any file(s) or attachment(s) transmitted with it are confidential, intended only for the named recipient, and may contain information that is a trade secret, proprietary, protected by the attorney work product doctrine, subject to the attorney-client privilege, or is otherwise protected against unauthorized use or disclosure. This message and any file(s) or attachment(s) transmitted with it are transmitted based on a reasonable expectation of privacy consistent with ABA Formal Opinion No. 99-413. Any disclosure, distribution, copying, or use of this information by anyone other than the intended recipient, regardless of address or routing, is strictly prohibited. If you receive this message in error, please advise the sender by immediate reply and delete the original message. Personal messages express only the view of the sender and are not attributable to Robertson, Johnson, Miller & Williamson. We advise you that any tax advice contained in this communication (including any attachments) is not intended to be used, and cannot be used, for purposes of (i) avoiding penalties imposed under the United States Internal Revenue Code or (ii) promoting, marketing or recommending to another person any tax-related matter addressed herein. TRANSMISSION OF THIS INFORMATION IS NOT INTENDED TO CREATE, AND RECEIPT DOES NOT CONSTITUTE, AN ATTORNEY-CLIENT RELATIONSHIP.

EXHIBIT “4”

EXHIBIT “4”

EXHIBIT “4”

Jarrad Miller

From: James S Proctor <jsp@madvantage.com>
Sent: Tuesday, November 18, 2014 11:48 AM
To: Jarrad Miller
Subject: Re: GSR UOA

I figured as much but wanted you to be aware. Reno is a small town.

Jim Proctor, CPA,CFE,CVA,CFF
Sent from my iPhone
Meridian Advantage
200 Ridge St. Suite 240
Reno, NV. 89501
775-323-2577
Fax 775-284-0987
jsp@madvantage.com

This is being sent from my iPhone, so please excuse any errors caused by my inability to type on such a small keyboard or do a spell check.

On Nov 18, 2014, at 10:53 AM, "Jarrad Miller" <jarrad@nvlawyers.com> wrote:

Should be fine as long as this does not prevent you from acting as a neutral receiver

Jarrad C. Miller, Esq.
Robertson, Johnson, Miller & Williamson
50 West Liberty Street, Suite 600
Reno, NV 89501
Telephone: (775) 329-5600
Facsimile: (775) 348-8300
Email: JARRAD@NVLAWYERS.COM
Website: www.NVLawyers.com

Important:

Please do not forward this e-mail without the expressed consent of the Author.

PERSONAL AND CONFIDENTIAL. This message originates from the law firm of Robertson, Johnson, Miller & Williamson. This message and any file(s) or attachment(s) transmitted with it are confidential, intended only for the named recipient, and may contain information that is a trade secret, proprietary, protected by the attorney work product doctrine, subject to the attorney-client privilege, or is otherwise protected against unauthorized use or disclosure. This message and any file(s) or attachment(s) transmitted with it are transmitted based on a reasonable expectation of privacy consistent with ABA Formal Opinion No. 99-413. Any disclosure, distribution, copying, or use of this information by anyone other than the intended recipient, regardless of address or routing, is strictly prohibited. If you receive this message in error, please advise the sender by immediate reply and delete the original message. Personal messages express only the view of the sender and are not attributable to

Robertson, Johnson, Miller & Williamson. We advise you that any tax advice contained in this communication (including any attachments) is not intended to be used, and cannot be used, for purposes of (i) avoiding penalties imposed under the United States Internal Revenue Code or (ii) promoting, marketing or recommending to another person any tax-related matter addressed herein. TRANSMISSION OF THIS INFORMATION IS NOT INTENDED TO CREATE, AND RECEIPT DOES NOT CONSTITUTE, AN ATTORNEY-CLIENT RELATIONSHIP.

From: James S Proctor [<mailto:jsp@madvantage.com>]
Sent: Tuesday, November 18, 2014 10:01 AM
To: Jarrad Miller
Subject: RE: GSR UOA

Jarrad,

For the 1st time, I see in your Reply that you sent this morning that Mark Wray is an attorney for the Defendants. I'm not sure as to the circumstances or if he is local counsel for appearances. However, please be aware that currently I am an expert witness on behalf of 3 of Mark Wray's clients in 3 different matters and have been for a number of months, and on one, for several years. I don't know what kind of complication that raises.

Let me know,

James S. Proctor, CPA, CFE, CVA, CFF
jsp@MAdvantage.com
Meridian Advantage
Forensic Accounting-Litigation Support-Business Valuation
200 Ridge St., Suite 240
Reno, NV. 89501
Phone (775)323-2577
Fax (775)284-0987
Website: www.MAdvantage.com

CONFIDENTIALITY NOTICE

This message is intended for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us at the above address via U.S. Postal Service.

☐ Please consider the environment before printing this email. Thank you!

-----Original Message-----

From: Jarrad Miller [<mailto:jarrad@nvlawyers.com>]
Sent: Tuesday, November 18, 2014 9:29 AM
To: James S Proctor
Subject: RE: GSR UOA

I think the request for an injunction should take care of that issue.

Best regards,

Jarrad C. Miller, Esq.

Robertson, Johnson, Miller & Williamson

50 West Liberty Street, Suite 600

Reno, NV 89501

Telephone: (775) 329-5600

Facsimile: (775) 348-8300

Email: JARRAD@NVLAWYERS.COM

EXHIBIT “5”

EXHIBIT “5”

EXHIBIT “5”



TEICHNER ACCOUNTING
FORENSICS & VALUATIONS, PLLC

RICHARD M. TEICHNER

CPA, ABV, CVA®, MAFF™, CFF, CRFAC™, DABFA®, FCPA™, CGMA®, CDFA™

CURRICULUM VITAE

July 2018

Manager/Member of Teichner Accounting Forensics & Valuations, PLLC, Reno and Las Vegas, Nevada

Formerly Director of Litigation Consulting and Business Valuation Services with Barnard, Vogler & Co., Certified Public Accountants, Reno, Nevada

Formerly partner of Moss Adams LLP, Certified Public Accountants, Los Angeles, California

Formerly partner of Braverman, Codron & Co., Beverly Hills, California, prior to merger with Moss Adams LLP

Graduate of University of Southern California

Certifications and accreditations:

Certified Public Accountant, licensed in Nevada and California

Accredited in Business Valuation (ABV), credentialed by the American Institute of Certified Public Accountants

Certified Valuation Analyst (CVA®), credentialed by the National Association of Certified Valuators and Analysts® (The CVA® is the only valuation credential accredited by the National Commission for Certifying Agencies®, which is a division of the Institute for Credentialing Excellence™.)

Master Analyst in Financial Forensics™ (MAFF™), credentialed by the National Association of Certified Valuators and Analysts®

Certified Financial Forensic (CFF), credentialed by the American Institute of Certified Public Accountants

Certified Forensic Accountant® (CRFAC™), credentialed by the American Board of Forensic Accounting®

Diplomate of the American Board of Forensic Accounting® (DABFA®)

Forensic Certified Public Accountant (FCPA™), credentialed by the Forensic CPA Society

Chartered Global Management Accountant® (CGMA®), credentialed by the American Institute of Certified Public Accountants

Certified Divorce Financial Analyst™ (CDFA™), credentialed by the Institute for Divorce Financial Analysts™

3500 Lakeside Court, Suite 210 • Reno, NV 89509
Phone: (775) 828-7474 • Fax: (775) 201-2110

8275 South Eastern Ave, Suite 200 • Las Vegas, NV 89123
Phone: (702) 724-2645 • Fax: (702) 441-4007

Email: accountingforensics@gmail.com • Website: accounting-forensics.com

Current Professional Society and Organization Memberships:

American Institute of Certified Public Accountants (AICPA)
Nevada Society of Certified Public Accountants (NVCPA)
National Association of Certified Valuators and Analysts® (NACVA®)
American Board of Forensic Accounting®
Forensic Expert Witness Association
Forensic CPA Society
National Association of Forensic Economics
Institute for Divorce Financial Analysts™
Washoe County Bar Association
Clark County Bar Association

Current Professional Board, Section and Group Memberships:

Board Member of the Litigation Forensics Board of NACVA®
AICPA Consulting Services Section
AICPA Private Companies Practice Section
Mentor Support Group of NACVA®
State Bar of Nevada Fee Dispute Arbitration Committee – Arbitrator and Mediator

Other activities

Published articles:

"What Attorneys Should Know About Financial Statements and The Information They Convey", *Nevada Lawyer* (January 2004), published by State Bar of Nevada.

"Important Issues of Business Valuations for Attorneys and Their Clients", *The Writ* (April 2005), published by Washoe County Bar Association.

Articles for Barnard, Vogler & Co. quarterly newsletters—"Divorce Using the Collaborative Approach", "Segregate Your Property and Save" (coauthored), "Bad News for Split Dollar Life Insurance Arrangements" (coauthored).

"A Collaborative Approach to Divorce May Benefit All", *On Point* (Fall 2006), published by CPAmerica International.

"CPAs as Witnesses: What They Expect from Attorneys", *On Point* (Winter 2007), published by CPAmerica International.

"What's the Real Value of that Business You Want to Buy?", *Northern Nevada Business Weekly* (March 5, 2007), published by Northern Nevada Communications, LLC.

"Important Issues of Business Valuations for Attorneys and Their Clients", *Nevada Family Law Report* (Spring 2007), published by State Bar of Nevada. (Different and much lengthier version than article published in *The Writ*, shown above.)

"What Financial Experts Expect from Attorneys", *Nevada Family Law Report* (Summer 2007), published by State Bar of Nevada.

"Net Operating Losses and Capital Losses: How They Might Be Treated As Marital Assets" (co-author), *Nevada Family Law Report* (Winter 2008), published by State Bar of Nevada.

"The Reality of Forensic Accountants, Business Appraisers", *Northern Nevada Business Weekly* (March 31, 2008), published by Northern Nevada Communications, LLC.

"What's It Worth? Important Issues In Business Valuations" (co-author), *The Advocate* (September 2009), published by the Idaho State Bar.

"The Financial Disclosure Form: Still a Ways to Go", *Nevada Family Law Report* (Winter 2010), published by State Bar of Nevada.

"Where have All the Values Gone?", *Nevada Family Law Report* (Spring 2010), published by State Bar of Nevada.

"A Deeper Look At The Valuation of Intangibles", *Northern Nevada Business Weekly* (December 20, 2010), published by Northern Nevada Communications, LLC.

"Determining Business Values Given the State of the Economy", Accounting: Beyond the Financial Statement supplement to *Northern Nevada Business Weekly* (October 31, 2011), published by Northern Nevada Communications, LLC.

"More About Business Valuation Professionals and Techniques", *Northern Nevada Business Weekly* (February 20, 2012), published by Northern Nevada Communications, LLC.

"What Does Our Business Valuation Committee Mean to You?", *The Silver State CPA* (Spring 2013), published by Nevada Society of CPAs.

"Another Perspective on Collaborative Divorce", *Northern Nevada Business Weekly* (June 15, 2015), published by Sierra Nevada Media Group.

Presentations:

"Valuations In Bankruptcy" to the Northern Nevada Bankruptcy Bar Association (October 2004).

"Using Financial Specialists as Experts or Consultants and What They Expert of Attorneys" to the Association of Defense Counsel (Northern Nevada) (August 2006).

"Tax Returns as a Source of Hidden Assets" and "Financial Documents as Sources of Hidden Assets" as part of the presentation "Forensic Accounting: Finding the Loot/Exposing the Vice" at the State Bar of Nevada 2007 Family Law Conference (March 2007).

"The Wizardly World of Business Valuations & Forensic Accounting" (co-presenter) at the State Bar of Nevada 2008 Family Law Conference (March 2008).

"Nontechnical Discussion About Business Valuations and Business Valuers" to the Elko County Bar Association (December 2009).

"An Overview of Accounting Controls to Prevent Fraud" to Construction Financial Management Association (April 2011).

"Business Valuation Issues for Attorneys Whose Areas of Practice Include Business, Litigation, Family Law and Business Transactions" to Washoe County Bar Association (January 2012) and to Clark County Bar Association (February 2012).

"What (Financial) Experts Expect of Attorneys, i.e. How Attorneys and Experts Can Work Best Together" and "Using Tax Returns and Other Financial Documents as Sources for Discovering Hidden Assets" to Washoe County Bar Association (November 7, 2013).

"Using Financial Documents, Public Records and the Internet as Sources for Uncovering Vital Information" as part of seminar titled "Hidden Assets: Techniques for Collecting Evidence" to Clark County Bar Association (February 6, 2014).

Various other presentations to professional organizations and to a variety of law firms.

Appearances:

News interview by KOLO Television, Channel 8, Reno, on 2004 year-end income tax planning.

Twice, guest presenter on "Face the State", KOLO Television, Channel 8, Reno, on Collaborative Divorce and, in particular, the role the financial expert plays; and about what one needs to know when purchasing a business.

Twice, guest on "Bosma On Business" radio program on KOH, Reno, discussing certain issues regarding business valuations.

Litigation Services Experience

Below is a **representative sample** of the over two-hundred matters in which I have been engaged as an expert witness and/or a consultant.

Legend: P-expert/consultant for plaintiff/complainant

D-expert/consultant for defendant/respondent

Economic damages and forensic accounting services in business litigation matters -

Seller was sued for misrepresentations in connection with sale of business. Determined accuracy of amounts for assets, liabilities and income represented by seller. (D)

Calculated lost profits resulting from customer list stolen by party representing itself as a potential buyer of business. (P)

Challenged the propriety of payments by a medical practice by departing member physician who claimed not to be properly compensated for his interest in the practice. (D)

Disputed the basis for computation of damages in a lawsuit against shipping company for loss on equipment damaged in transit. (D)

Disputed propriety of amount of restitution, sought by an employee claiming to be a shareholder in an apparel manufacturer, for not having received adequate compensation for her interest in the company and her efforts upon termination of her employment. (D)

Analyzed claim by computer manufacturer for amounts due to it from distributor for the sales of components, and undertook determining the disposition of funds of the distributor owed to the manufacturer, which the distributor claimed were depleted as a result of the damages it suffered. (P) In cross-complaint, argued against various damages claimed by the distributor against the manufacturer. (D)

Challenged the propriety of the computations in applying the formula in a buy-sell agreement for the purchase of a shareholder's stock in an S corporation; and calculation of damages relative to the action. (D)

Established amount of damages resulting from a plumbing contracting company going out of business. Damages were determined primarily based on the value of the company prior to its going out of business and on the future loss of earnings of the principal of the company. (P)

Established amount for damages to an active shareholder of a freight forwarding company who was "locked out" by the other shareholders. The damages were determined based primarily on a valuation of the company. (P)

Analyzed claims by a shareholder of a large advertising and marketing firm that excessive compensation was being paid to the other shareholders, and that other breaches of fiduciary responsibility existed, such as the use of company funds to finance a shareholder's personal activities. (P)

Contested propriety of claim by individual who alleged that employer misstated results of operations of a division through improper accounting practices, resulting in no earnings of the division on which additional compensation was to be calculated. (D) In cross-complaint, established lost profits, value of lost business opportunities and loss of future tax benefits, and the incurring of various costs, resulting from an insurance company refusing to cover costs of other litigation matter. (P)

Challenged the presentation of financial statements that included improper expense allocations and other charges, and incorrect recording of revenues, thus showing reported losses, which were used as the basis to terminate agreement by a credit card bank. (D)

Refuted claims that the business decisions and transactions conducted by an individual prevented other parties' ability to effect a tax-deferred (IRC Section 1031) exchange. (D)

Rebutted a company's claims that, if it were not for a bank's negligence and inactions, the losses it suffered from an embezzlement would have been prevented. (D)

Refuted various calculations used in determining economic damages against a cable company, which, allegedly, were all a result of its improper installation of cable. (D)

Analyzed claims of a minority shareholder of contracting company, which included allegations that the controlling shareholder was misusing and diverting company funds, and was withholding profit distributions to the minority shareholder. (P)

Calculated damages resulting from a stockholder of a company claiming to have received his fair share of the proceeds. (P)

Rebutted claims that the majority stockholders of companies were diverting funds for personal use, not adequately compensating the minority stockholder and undervalued the shares of one of the companies owned by the minority stockholder. (D)

Challenged alter ego claims against the owner of various companies and allegations that the owner had defaulted on loans. (D)

Determined economic results of operations and sales of various rental properties, some of which were to be determined as being wholly owned and other partially owned by Plaintiff. (P)

Rebutted claims that a finance company did not properly manage or account for loans that it purchased with recourse. (D)

Established the value of patent in bankruptcy matter on behalf of a secured creditor asserting right to the patent, which was being challenged by another secured creditor.

Rebutted claims of improper accounting and of damages in connection with factored receivables, and related loans and reserve accounts. (D)

Identified undisclosed commissions, amounting to millions of dollars, on money transfers that were owed to the facilitator of the transactions. (P)

Determined the amount owed to a minority interest owner in a company, based on a value of the ownership interest and on measures of recovery as impacted by actions of the two other owners of the company that were detrimental to the minority interest owner. (P)

Refuted claim for alleged loss of profits from real estate developments resulting from the preclusion of usage of water rights acquired. (D)

Rebutted allegations of lack of standards of care by a certified public accountant in connection with the purported mismanagement of Internal Revenue Service audits, and the alleged ramifications as a result. (D)

Determined monetary damages to a company resulting from a minority stockholder and employees using trade secrets and other information of the company to start a competing company. (P)

Lost profits/earnings from personal injury and wrongful death matters -

Rebutted claim for extent of loss of earnings of physician due to auto accident. (D)

Calculated amounts for lost earnings, past and future, from injuries due to a motorcycle defect. (P)

Established amount of loss of earnings of a reputed specialist in his area of practice of medicine resulting from injuries sustained due to a fall. (P)

Refuted the amount of calculated economic damages based on loss of earnings and earning capacity resulting from a motor vehicle accident. (D)

Determined loss of earnings of owner of a business due to very serious bodily injuries from dog bites. (P)

Rebutted claims for loss of earnings and value of business due to an alleged wrongful death resulting from a bicycle accident. (D)

Multiple other matters involving claims of economic damages resulting from personal injuries and from wrongful deaths.

White collar crime –

Embezzlements and various other matters involving criminal financial activities.

Family law matters -

A multitude of family law matters, including matters in which the marital estates were in the tens of millions to the hundreds of millions of dollars, that have included services involving property division, alimony, business valuations, tracing of separate/community assets, divorce-associated tax ramifications, and other financially related issues.

Business Valuations

Business valuations for business litigation and family law litigation matters, as well as valuations of businesses or partial interests in businesses for establishing values for such purposes as purchases or sales, estate taxes, and gifting.

Background in Accounting, Consulting and Tax Services

Prior to devoting practice primarily to business litigation, family law and business valuation matters:

Partner-in-charge of financial accounting services, including audit and other attest engagements, and of formulating, implementing and monitoring firm's quality control policies and procedures.

Many years of experience in providing business consulting and tax services, including heavy involvement in rendering tax advice and planning, tax compliance, and deliberations with the Internal Revenue Service and other taxing authorities.

EXHIBIT “6”

EXHIBIT “6”

EXHIBIT “6”

1 CODE:
Jarrad C. Miller, Esq. (NV Bar No. 7093)
2 Jonathan J. Tew, Esq. (NV Bar No. 11874)
Robertson, Johnson, Miller & Williamson
3 50 West Liberty Street, Suite 600
Reno, Nevada 89501
4 (775) 329-5600
Attorneys for Plaintiffs

5
6 **SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**
7 **IN AND FOR THE COUNTY OF WASHOE**

8 ALBERT THOMAS, individually; *et al.*,
9 Plaintiffs,

10 vs.

Case No. CV12-02222
Dept. No. 10

11 MEI-GSR Holdings, LLC, a Nevada Limited
12 Liability Company, GRAND SIERRA
13 RESORT UNIT OWNERS' ASSOCIATION,
a Nevada nonprofit corporation, GAGE
14 VILLAGE COMMERCIAL
DEVELOPMENT, LLC, a Nevada Limited
15 Liability Company; AM-GSR HOLDINGS,
LLC, a Nevada Limited Liability Company;
16 and DOE DEFENDANTS 1 THROUGH 10,
inclusive,

17 Defendants.

18 **DECLARATION OF JARRAD C. MILLER, ESQ. IN SUPPORT OF**
19 **MOTION TO SUBSTITUTE RECEIVER**

20 I, Jarrad C. Miller, state:

21 If called as a witness, I would and could testify that the following facts are within my
22 personal knowledge.

- 23 1. I am an attorney of record herein for Plaintiffs herein.
- 24 2. I am licensed to practice law in the State of Nevada, and am a Shareholder of the
25 Robertson, Johnson, Miller & Williamson law firm, which has offices in Reno, Nevada and Las
26 Vegas, Nevada.
- 27 3. A true and correct copy of correspondence from Defendants to Plaintiff Lee Van
28 der Bokke dated July 19, 2016, is attached hereto as Exhibit 1.

4. True and correct copies of Owner Account Statements for Units 2157, 2181, 1728, and 2385, respectively dated February 19, 2018, June 19, 2018, June 19, 2018, May 21, 2018, and September 19, 2017, are attached hereto as Exhibit 2.

5. A true and correct copy of an email string between Receiver Proctor and attorney Miller is attached hereto as Exhibit 3.

6. A true and correct copy of an email string between attorney Hartman and attorney Miller are attached hereto as Exhibit 4.

7. A true and correct copy of Mr. Teichner's Curriculum Vitae is attached hereto as Exhibit 5.

I have read this Declaration, and I have personal knowledge of all matters stated herein and am competent to testify with respect to all such matters. I declare under penalty of perjury that the foregoing is true and correct and that this Declaration was executed on

December 20th, 2018.

Jarrad C. Miller, Esq.

1 CODE: 3105
Jarrad C. Miller, Esq. (NV Bar No. 7093)
2 Jonathan J. Tew, Esq. (NV Bar No. 11874)
Robertson, Johnson, Miller & Williamson
3 50 West Liberty Street, Suite 600
Reno, Nevada 89501
4 (775) 329-5600
Attorneys for Plaintiffs
5

6 **SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**
7 **IN AND FOR THE COUNTY OF WASHOE**
8

9 ALBERT THOMAS, individually; *et al.*,

10 Plaintiffs,

11 vs.

Case No. CV12-02222
Dept. No. 10

12 MEI-GSR Holdings, LLC, a Nevada Limited
Liability Company, GRAND SIERRA
13 RESORT UNIT OWNERS' ASSOCIATION,
a Nevada nonprofit corporation, GAGE
14 VILLAGE COMMERCIAL
DEVELOPMENT, LLC, a Nevada Limited
15 Liability Company; AM-GSR HOLDINGS,
LLC, a Nevada Limited Liability Company;
16 and DOE DEFENDANTS 1 THROUGH 10,
inclusive,
17

18 Defendants.

19 **ORDER GRANTING MOTION FOR INSTRUCTIONS TO RECEIVER**

20 On January 25, 2019, the Court issued an Order Granting Motion to Substitute Receiver
21 ("January 25 Order"). The January 25 Order substituted Mr. Richard Teichner ("Receiver") in
22 place of Mr. James Proctor as receiver. It also made a number of important findings regarding
23 the status of the case, including that: (1) the Nevada Supreme Court's reversal of this Court's
24 May 9, 2016 dismissal order ("Dismissal Order") restored the case to the procedural posture it
25 was in immediately prior to the date of the Dismissal Order; and (2) all of this Court's orders
26 issued prior to the Dismissal Order were in full force and effect as if the Dismissal Order was
27 never issued. Now that the Court has entered its January 25 Order regarding substitution of the
28 Receiver, the Plaintiffs' Motion for Instructions to Receiver ("Motion") is ripe for review.

1 The Court has reviewed Plaintiffs' Motion, Defendants' Opposition to Motion for
2 Instructions to Receiver ("Opposition"), and Plaintiffs' Reply in Support of Motion for
3 Instructions to Receiver ("Reply"). Based on the Court's review of the briefing, the Court finds
4 that restitution or disgorgement is necessary to fully restore this case to the procedural posture
5 that existed immediately prior to the Dismissal Order. The Court further finds that Defendants
6 are required by law to provide restitution or disgorgement of all benefits they received based on
7 the now reversed Dismissal Order, and that the Defendants' Opposition failed to provide any
8 valid legal authority to contest the Defendants' obligation to provide restitution or disgorgement.

9 Based on the forgoing:

10 **IT IS HEREBY ORDERED** that the Plaintiffs' Motion is granted.

11 **IT IS FURTHER ORDERED** that the Receiver has the authority to, and shall, disgorge
12 to Plaintiffs any and all fees the Defendants assessed following the Dismissal Order that are in
13 excess of those calculated by the receiver in his January 7, 2016 Receiver's Determination of
14 Fees and Reserves ("Increased Fees").

15 **IT IS FURTHER ORDERED** that the Receiver shall unwind the reinstated fees that the
16 Defendants were previously prohibited from collecting under this Court's sanctions orders,
17 Findings of Fact, Conclusions of Law and Judgment ("FFCLJ"), and receivership orders (the
18 "Reinstated Fees");

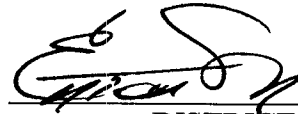
19 **IT IS FURTHER ORDERED** that the Receiver shall rescind and unwind the special
20 assessment ("Special Assessment") charged by the Defendants that is prohibited by this Court's
21 sanctions and other orders;

22 **IT IS FURTHER ORDERED** that the Receiver shall disgorge to Plaintiffs all amounts
23 the Defendants collected, through payment, offset, credit, or otherwise, to pay the Reinstated
24 Fees and Special Assessment.

25 **IT IS FINALLY ORDERED** that until the Receiver has sufficient funds required to
26 completely disgorge to Plaintiffs the Increased Fees, Reinstated Fees and Special Assessment
27 (the "Total Disgorgement Amount"), the Receiver shall allocate the Defendants' one half of the
28 revenue split each month under the rental agreements to the Plaintiffs until all required amounts

1 are disgorged. The Receiver shall, as soon as sufficient funds are available, and consistent with
2 the authority vested in the Receiver under the Court's January 7, 2015 Order Appointing
3 Receiver and Directing Defendants' Compliance, immediately pay to Plaintiffs the Total
4 Disgorgement Amount without delay.

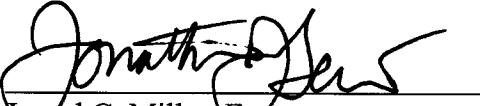
5 DATED this 15 day of FEBRUARY, 2019.

6
7 

8 DISTRICT COURT JUDGE

9
10 Submitted by:

11 ROBERTSON, JOHNSON,
12 MILLER & WILLIAMSON

13 

14 Jarrod C. Miller, Esq.
15 Jonathan Joel Tew, Esq.
16 Attorney for Plaintiffs
17
18
19
20
21
22
23
24
25
26
27
28

3835
DAVID C. McELHINNEY
Nevada Bar No. 0033
LEWIS ROCA ROTHGERBER CHRISTIE LLP
One East Liberty Street, Suite 300
Reno, Nevada 89501
Tele: (775) 823-2900
Email: dmcelhinney@lrrc.com

*Attorneys for Defendants MEI-GSR Holdings, LLC,
AM-GSR Holdings, LLC, Grand Sierra
Resort Unit Owners' Association, and
Gage Village Commercial Development, LLC*

**IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE**

ALBERT THOMAS, et. al.,

Plaintiffs,

v.

MEI-GSR HOLDINGS, LLC., a Nevada
Limited Liability Company, AM-GSR
Holdings, LLC., a Nevada Limited Liability
Company, GRAND SIERRA RESORT UNIT
OWNERS' ASSOCIATION, a Nevada
Nonprofit Corporation, GAGE VILLAGE
COMMERCIAL DEVELOPMENT, LLC., a
Nevada Limited Liability Company, and
DOES I-X inclusive,

Defendant.

Case No. CV12-02222

Dept. No.: 10

**RECEIVER'S REPORT RE
GSRUOA, FOR THE PERIOD
FROM SEPTEMBER 1 THROUGH
SEPTEMBER 30, 2019**

RECEIVER'S REPORT

A copy of *Receiver's Report Re Grand Sierra Resort Unit Owners' Association In Receivership For The Period From September 1 Through September 30, 2019*, is attached hereto as Exhibit "1".

RESPECTFULLY SUBMITTED this 7th day of October, 2019.

LEWIS ROCA ROTHGERBER CHRISTIE, LLP

By: /s/ David C. McElhinney
DAVID C. McELHINNEY, ESQ.
One East Liberty Street, Suite 300
Reno, Nevada 89501
Attorney for Defendants

AFFIRMATION
Pursuant to NRS 239B.030

The undersigned does hereby affirm that this document does not contain the social security number of any person.

DATED this 7th day of October, 2019.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ David C. McElhinney
DAVID C. McELHINNEY, ESQ.
Nevada Bar No. 0033
LEWIS ROCA ROTHGERBER CHRISTIE LLP
One East Liberty Street, Suite 300
Reno, Nevada 89501

One East Liberty Street, Suite 300
Reno, NV 89501-2128

Lewis Roca
ROTHGERBER CHRISTIE

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of Lewis Roca Rothgerber Christie LLP and that on this 7th day of October, 2019, I served a true and correct copy of the foregoing **RECEIVER'S REPORT RE GSRUOA, FOR THE PERIOD FROM SEPTEMBER 1 THROUGH SEPTEMBER 30, 2019** with the Clerk of the Court by using the ECF system which served the following parties electronically:

G. David Robertson, Esq.
Jarrad C. Miller, Esq.
Jonathan J. Tew, Esq.
ROBERSTON, JOHNSON, MILLER & WILLIAMSON
50 West Liberty Street, Suite 600
Reno, Nevada 89501
Attorneys for Plaintiffs

I further certify that on the 7th day of October, 2019, I caused to be deposited in the U.S. Mail, first-class postage fully prepaid, a true and correct copy of the foregoing **RECEIVER'S REPORT RE GSRUOA, FOR THE PERIOD FROM SEPTEMBER 1 SEPTEMBER 30, 2019**, addressed to the following:

Richard M. Teichner, As Receiver for GSRUOA
Teichner Accounting Forensics & Valuations, PLLC
3500 Lakeside Court, Suite 210
Reno, NV 89509

I declare under penalty of perjury under the laws of the State of Nevada, that the foregoing is true and correct.

Dated this 7th day of October, 2019.

/s/ Dawn M. Hayes
An Employee of Lewis Roca Rothgerber
Christie LLP

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT INDEX

EXHIBIT NO.	DESCRIPTION	NO. PAGES
Exhibit 1	Receiver's Report, Grand Sierra Resort Unit Owners' Association In Receivership, For the Period from September 1 through September 30, 2019.	4



Receiver's Report
Grand Sierra Resort Unit Owners' Association In Receivership
For the Period from September 1 through September 30, 2019

Re: Albert Thomas, et al. vs. MEI-GSR Holdings, LLC, Grand Sierra Resort Unit Owners' Association, Village Commercial Development, LLC AM-GSR Holdings, LLC, et al.;
Case No. CV12-02222, Dept. No. 10

This report covers the month of September 2019, during which period the services performed by this Receiver and his assistant were somewhat abbreviated due to issues that are still pending.

As has been presented in prior Receiver reports, the following describes the status of the issues as of September 30 that this Receiver is charged with monitoring and enforcing:

Reserves through September –

In my prior report for the period ended August 31 ("my report"), I indicated that the amount of the total reserves to date was \$11,341,606.74. This amount has been revised to \$11,351,320.00 because the previously stated amount of \$11,341,606.74 had excluded seven units whose owners are part of the rental program (including two double units, each double unit having a single owner), whereas only the owners of three units should have been excluded (but see the third paragraph below). The owners of those three units (two of which have a single owner) have not been paying for the reserves charged to them, as opposed to the owners of the other four units who have been making any payments for reserves. Counsel for the Plaintiffs and for the Defendants will need to decide whether or not each of the unit owners who do not participate in the rental program but who have been paying reserve amounts should be refunded their respective contributions to the reserves, giving that Defendants' motion for excluding unit owners not part of the rental program from paying into the reserves was conceded by Plaintiffs.

For September, the additions to the reserves is \$283,783.00, bringing the total for the reserves as of September 30 to \$11,635,103.00 (i.e. \$11,351,320.00 plus \$283,783.00).

The difference between the \$11,341,606.74 and the \$11,351,320.00, or \$9,713.26, as of August 31 (consists of two components. One of the components, in the amount of \$5,567.13, is mainly due to our excluding all of the seven units whose owners are not part of the rental program from May through August because we were not aware of which units were to be excluded. The other component, in the amount of \$4,146.13, is due to a difference between our computation of the correction to the amount that should exclude the three units (two owners) in the amount of \$78,556.18 and GSR's amount of \$82,702.31, or \$4,146.13. Accordingly, until the difference of \$4,146.13 between this Receiver's amount and GSR's amount representing the exclusion of reserves of the unit owners who are not part of the rental program, gets resolved, this Receiver's balance for the reserves as of September 30 of \$11,635,103.00 is being used. We are in the process of reconciling the difference of \$4,146.13 between our amount and GSR's amount.

We have received copies of the bank statements for the three respective reserves bank accounts as of August 31, 2019. Important to note is that no deposits were made during August; thus, the balances in the accounts for the FF&E, Hotel Reserve and Shared Facilities Reserve remain at the July balances of \$780,570.17, \$643,882.14 and \$794,958.37, respectively.¹

Disgorgement through August 2019 of excess Daily Use Fees (DUFs), other expenses and reserves that were calculated through December 31, 2018 and previously reported –

In my prior report, under the heading “Disgorgement through August”, I had indicated that, of the excess DUFs, other expenses and reserves in the amount of \$676,078.68 at December 31, 2018 that was yet to be disgorged as of July 31 was \$85,999.61, based on a total disgorgement through July in the amount of \$590,079.07. As previously stated in an earlier Receiver’s report, the amount totaling \$676,708.68 (not \$676,078.68 as mentioned in my prior report) is based on the excess DUFs, other expenses and reserves calculated for the period from May 9, 2016 through December 31, 2018.

As of August 31, 2019, the disgorgement representing the excess DUFs, other expenses and reserves as of December 31, 2018 is \$712,712.92 according to our calculations and based on our testing procedures. GSR has calculated \$713,075.34 for the amount as having been disgorged. According to our calculations, GSR has overpaid \$36,004.24. GSR has \$36,366.66 as the overpayment. (We are in the process of reconciling the difference of \$362.42 between our amount and GSR’s amount.) This amount of overpayment of \$36,666.66 per GSR has been offset against the daily resort fees for the period June 4 through August 31 (discussed below) which have been characterized as a miscellaneous credit (“Misc. (credits)”) on the monthly statements for August. This treatment of offsetting the overpayment of excess DUFs, other expenses and reserves against the monthly amounts for the daily resort fees due to Plaintiffs has not been authorized by this Receiver. In this Receiver’s opinion, such overpayment should be separately offset against all the disgorgements for daily resort fees, complimentary room rates for gaming customers and discounts on rates for gaming customers, and such disgorgements separately paid to Plaintiffs.

Daily Resort Fees (DRFs) –

The amount due to Plaintiffs for the DRF’s through June 3, 2019, which was \$803,562.93, has been paid to Plaintiffs, as indicated in my prior report. The additional DRFs due to Plaintiffs from June 4 through August 31, 2019 is \$98,039.14. As mentioned above, GSR has offset this amount of DRFs due to the Plaintiffs by the \$36,366.66 overpayment mentioned above (which was not authorized); thus, the total of the amounts of the miscellaneous credits on the Plaintiffs’ August statements is \$61,672.48.

As mentioned in my prior report, a request has been made to GSR for it to include the DRFs for each for Plaintiff’s unit on the monthly statements. The way this is to be presented is as a separate column in the Reservation Detail section on the statements, so that the far-right column in that section titled “(Room Revenue)/Fees” includes the DRF amounts for the month. As mentioned in my prior report, the change to the monthly statements requires programming revisions, which, according to our understanding, Jun Candela, Senior Programming Analyst at GSR, is still attempting to accomplish.

¹Also, important to note is that, subsequent to September 30, we received the September 30, 2019 bank statements for the three reserve accounts and that no additions were made to these accounts during September. Thus no additional deposits have been made into reserves accounts since July.

Complementary rooms –

We have received a monthly schedule for comped rooms through August and we have verified that the owners of the comped rooms were credited with the average daily rates as opposed to the comped rate. We have also received a schedule for the period from January 1, 2019 through June 3, 2019 that includes brief descriptions as to the type of rate charged to customers, per room, for each of the Plaintiffs. These descriptions, although not entirely clear as to the type of rates that were charged, appear to distinguish rooms for which gaming comps were given from rooms with other rates by the use of the terms “casino rate” and “players rate” for gaming comps. We understand that other types of reduced rates, including discounted rates, are for group rates, convention rates, and other special offers. We are still attempting to confirm this and have been told that Kent Vaughn is the person at GSR who should be able to assist us.

Although we have verified that average daily rates were credited to the Plaintiffs for rooms that were comped through August 2019, we cannot yet discern whether any of the comps within the first five nights for which no credit was given to the Plaintiffs were for gaming customers, as mentioned in my prior report. Once we know which comps were for gaming customers we can then determine the extent to which any Plaintiffs were not credited for those comps offered to gaming customers since May 9, 2016. We will then need to compare each date since May 9, 2016 that a customer was comped or paid a gaming rate with the rate credited to the Plaintiff, if any, on that date, so that we are able to determine that, for each gaming comp, or discount if possible (see section below), each Plaintiff was credited with the average daily rate and that none of the first five nights for which no credit for rooms rates is permitted² includes a night for which a comp was given to a gaming customer. Unless there is way to extract the data for the gaming comps or rates and the data for the room rates credited to the Plaintiffs, and then use some software-driven means (maybe Excel) of matching each gaming comp with each corresponding rate credited (or not credited) to a Plaintiff, performing the manual task of making each of these comparisons will be very tedious and extremely time consuming.

Discounted room rates –

The specific data for discounted rooms cannot be extracted without some programming revisions. However, at this point, my understanding is that prospects for making such revisions are not very likely because extracting data for the amount of the discounts to gaming customers from the data for discounts to other customers is difficult, if not impossible, to accomplish. (The schedule from January 1, 2019 through June 3, 2019 referred to in the section above for complementary rooms does not contain the kind of data necessary to distinguish the amounts of gaming discounts from other types of discounts.) However, as mentioned in my prior report, we will continue to follow up on whether the relevant discount data can be extracted.

Monthly statements to Plaintiffs –

We have tested and verified the data on the monthly statements for August, dated September 17, as we have with all prior statements since the beginning of this receivership.

We await instructions from the Court based on its decisions on the motions, oppositions and replies filed by Plaintiffs and Defendants pertaining to the hearing scheduled for October 30.

²Per paragraph 11 of the Unit Rental Agreement.

Respectively,

TEICHNER ACCOUNTING FORENSICS & VALUATIONS, PLLC

A handwritten signature in black ink that reads "Richard M. Teichner". The signature is written in a cursive, flowing style.

Richard M. Teichner, CPA, ABV, CVA®, MAFF®, CFF, CRFAC®, DABFA®, FCPA™, CGMA®, CDFA®
As Receiver for the Grand Sierra Resort Unit Owners' Association

October 7, 2019

Code: 1075
Jarrad C. Miller, Esq. (NV Bar No. 7093)
Jonathan Joel Tew, Esq. (NV Bar No. 11874)
Robertson, Johnson, Miller & Williamson
50 West Liberty Street, Suite 600
Reno, Nevada 89501
jarrad@nvlawyers.com
jon@nvlawyers.com
Attorneys for Plaintiffs

SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE

ALBERT THOMAS, individually; *et al.*,
Plaintiffs,
vs.

Case No. CV12-02222
Dept. No. 10

MEI-GSR Holdings, LLC, a Nevada Limited
Liability Company, GRAND SIERRA
RESORT UNIT OWNERS' ASSOCIATION,
a Nevada nonprofit corporation, GAGE
VILLAGE COMMERCIAL
DEVELOPMENT, LLC, a Nevada Limited
Liability Company and DOE DEFENDANTS
1 THROUGH 10, inclusive,
Defendants.

AFFIDAVIT OF BIAS OR PREJUDICE
CONCERNING KATHLEEN SIGURDSON, ESQ.
PURSUANT TO NRS 1.235

STATE OF NEVADA)
 : ss.
COUNTY OF WASHOE)

I, JARRAD C. MILLER, being first duly sworn, depose and state as follows:

1. Except as otherwise stated, all matters herein are based upon my personal knowledge.

2. I am over the age of 18, competent to make this Affidavit, and if called to testify, my testimony will be consistent with the statements contained herein.

3. I am an attorney licensed to practice law in the State of Nevada.

AFFIDAVIT OF BIAS OR PREJUDICE CONCERNING KATHLEEN SIGURDSON, ESQ.
PURSUANT TO NRS 1.235

1 4. I am a shareholder with the law firm of Robertson, Johnson, Miller & Williamson
2 and counsel for the Plaintiffs herein.

3 5. Pursuant to NRS 1.230(1), a judge shall not preside over a matter when the judge
4 entertains actual bias or prejudice for or against one of the parties to the action.

5 6. “[T]here is a serious risk of actual bias – based on objective and reasonable
6 perceptions – when a person with a personal stake in a particular case had a significant and
7 disproportionate influence in placing the judge on the case by raising funds or directing the
8 judge’s election campaign when the case was pending or imminent.” Caperton v. A.T. Massey
9 Coal Co., Inc., 556 U.S. 868, 884, 129 S.Ct. 2252, 2263-64 (2009).

10 7. This affidavit of prejudice is submitted because a very similar “extraordinary
11 situation where the Constitution requires recusal” addressed in Caperton is present in this matter
12 as explained in further detail below. Caperton, 556 U.S. at 887, 129 S.Ct. at 2265.

13 8. The First Amended Complaint in this action was filed on September 10, 2012.
14 Subsequently, on March 26, 2013, Plaintiffs filed their Second Amended Complaint (“SAC”) in
15 the action.

16 9. Plaintiffs SAC alleged, among other things, that Defendant MEI-GSR Holdings,
17 LLC (“Defendant MEI-GSR”), owned/managed by Alex Meruelo, was controlling the Unit
18 Owners’ Association to Plaintiffs’ detriment and Defendants’ benefit. Plaintiffs asserted the
19 following claims for relief: Petition for Appointment of Receiver as to Defendant Grand Sierra
20 Resort Unit Owners’ Association; Intentional and/or Negligent Misrepresentation as to
21 Defendant MEI-GSR; Breach of Contract as to Defendant MEI-GSR; Quasi-Contract/Equitable
22 Contract/Detrimental Reliance as to Defendant MEI-GSR; Breach of the Implied Covenant of
23 Good Faith and Fair Dealing as to Defendant MEI-GSR; Consumer Fraud/Nevada Deceptive
24 Trade Practices Act against Defendant MEI-GSR; Declaratory Relief as to Defendant MEI-GSR;
25 Conversion as to Defendant MEI-GSR; Demand for Accounting as to Defendant MEI-GSR and
26 Defendant Grand Sierra Unit Owners’ Association; Specific Performance Pursuant to NRS
27 116.112, Unconscionable Agreement; Unjust Enrichment/Quantum Meruit against Defendant
28

1 Gage Village Development; and Tortious Interference with Contract and/or Prospective Business
2 Advantage against Defendants MEI-GSR and Gage Development.

3 10. From September 3, 2013 to September 6, 2013, counsel for Defendants had the
4 opportunity to depose the majority of the Plaintiffs in this case, but Plaintiffs' attempts at
5 obtaining discovery were thwarted by Defendants.

6 11. On September 4, 2013, the Discovery Commissioner granted Plaintiffs' Motion to
7 Compel Production of Documents and sanctioned Defendants \$1,000, "as and for an award of
8 the reasonable expenses incurred by Plaintiffs in making this motion."

9 12. On September 5, 2013, the Discovery Commissioner granted Plaintiffs' Second
10 Motion to Compel and sanctioned Defendants another \$1,000 for their "unexcused failures to
11 respond to Plaintiffs' interrogatories and requests for production."

12 13. On September 13, 2013, Plaintiffs filed a Motion to Compel Deposition after Alex
13 Meruelo, owner of Defendant MEI-GSR Holdings, LLC, failed to attend his scheduled
14 deposition on September 5, 2013.

15 14. On October 17, 2013, the Court issued an Order setting a hearing after Plaintiffs
16 filed a Motion for Sanctions Under NRCP 37(b) for Defendants' failure to comply with Court
17 Orders.

18 15. On October 21, 2013, the Court began a three-day hearing to assess the extent to
19 which sanctions were appropriate. At the conclusion of the hearing, the Court struck the
20 Defendants' counterclaims as a sanction for failing to comply with the discovery rules and this
21 Court's Orders and ordered that Defendants pay all Plaintiffs' attorneys' fees and costs
22 associated with the three-day hearing.

23 16. On November 22, 2013, Plaintiffs filed a Renewed Motion for Sanctions Under
24 NRCP 37(b) because Defendants' nefarious litigation practices continued.

25 17. On October 3, 2014, this Court granted Plaintiffs' Motion for Case-Terminating
26 Sanctions, struck the Defendants' Answer, and set a prove-up hearing on damages.

27 18. Commencing on March 23, 2015, the Court held a three-day prove-up hearing on
28 Plaintiffs' damages.

1 19. On October 9, 2015, this Court issued a Findings of Fact, Conclusions of Law and
2 Judgment (“FFCL”) wherein Plaintiffs were awarded more than \$8,000,000 (EIGHT MILLION
3 DOLLARS) in monetary relief against Defendants.

4 20. In its FFCL, the Court highlighted Defendants’ “systematic attempts at
5 obfuscation and intentional deception.” FFCL at 2:17-18. The Court went on to state that “the
6 Court has repeatedly had to address the lackadaisical and inappropriate approach the Defendants
7 have exhibited toward the Nevada Rules of Civil Procedure, the District Court Rules, the
8 Washoe District Court Rules, and the Court’s orders. The Defendants have consistently, and
9 repeatedly, chosen to follow their own course rather than respect the need for orderly process in
10 this case.” Id. at 2:18-22. The Court further stated, “[t]he Defendants have turned [the directive
11 of NRCp 1] on its head and done everything possible to make the proceedings unjust, dilatory,
12 and costly.” Id. at 2:24-25.

13 21. At the time the FFCL was entered in late 2015, the Court deferred hearing
14 argument regarding punitive damages to a later date.

15 22. Following the FFCL, an appeal and extensive motion practice occurred. The
16 Court granted a motion to dismiss for lack of subject matter jurisdiction filed by Defendants,
17 which was then reversed by the Nevada Supreme Court. See Albert Thomas, et al. v. MEI-GSR
18 et. al, Nevada Supreme Court Opinion No. 70498, dated February 26, 2018.

19 23. The first Receiver appointed in this action, James Proctor, had to be removed as
20 receiver from this case because the Plaintiffs had learned that Defendants offered him a position
21 of employment with the Grand Sierra Resort.

22 24. At all times relevant hereto, the Honorable Elliot Sattler was the District Court
23 Judge in Department 10 presiding over this case.

24 25. The Court still needs to rule on a pending motion concerning punitive damages
25 filed by the Plaintiffs, and if granted, the Court will need to hold a hearing concerning a potential
26 punitive damages award which could be a multiple of the existing \$8,000,000 (EIGHT
27 MILLION DOLLAR) compensatory award of damages.

28

1 26. Despite being the highest rated general jurisdiction judge according to the
2 Washoe County Bar Association Judicial Survey, the Honorable Elliot Sattler was the only
3 general jurisdiction Washoe County District Court Judge to draw an opponent during the 2020
4 election. (See, Washoe County Bar Association Judicial Survey 2020 Results, attached hereto as
5 Exhibit 1, obtained from [https://www.wcbar.org/wp-content/uploads/2020/09/WCBA-](https://www.wcbar.org/wp-content/uploads/2020/09/WCBA-Summary_8-24-20.pdf)
6 [Summary_8-24-20.pdf](https://www.wcbar.org/wp-content/uploads/2020/09/WCBA-Summary_8-24-20.pdf).)

7 27. Kathleen Sigurdson, Esq. filed for judicial candidacy against the Honorable Elliot
8 Sattler on January 17, 2020.

9 28. An article was published in the Nevada Independent titled Is Justice for Sale in
10 Washoe County? which indicates that multiple legal professionals in Washoe County were
11 promised a “fully funded” campaign if they would run against the Honorable Elliot Sattler in the
12 2020 election. (See, article attached hereto as Exhibit 2 entitled “Is Justice for Sale in Washoe
13 County?” obtained from [https://thenevadaindependent.com/article/is-justice-for-sale-in-washoe-](https://thenevadaindependent.com/article/is-justice-for-sale-in-washoe-county)
14 [county](https://thenevadaindependent.com/article/is-justice-for-sale-in-washoe-county).)

15 29. NRS 294A.100 provides that no person shall make or commit to make a
16 contribution to a candidate for any state office in an amount which exceeds \$10,000.

17 30. It has been reported that on January 31, 2020, the Grand Sierra Resort (“GSR”),
18 made the \$10,000 maximum contribution to Ms. Sigurdson’s campaign. (See, 2020
19 Contributions and Expenses Report #1, attached hereto as Exhibit 3.)

20 31. The GSR does not appear to be a frequent contributor to political campaigns. The
21 Nevada Secretary of State’s website reports that the GSR has contributed to Nevada political
22 campaigns on only four occasions: (1) on July 20, 2016, the GSR contributed \$1,000 to Amber
23 Joiner in her campaign for State Assembly, District 24; (2) on December 27, 2017, the GSR
24 contributed \$5,000 to Jason Frierson in his campaign for State Assembly, District 8; (3) on
25 December 11, 2018, the GSR contributed \$1,528.00 to Bonnie Weber in her campaign for Reno
26 City Council, Ward 4; and (4) on January 31, 2020, the GSR contributed \$10,000 to Kathleen
27 Sigurdson in her campaign for District Court Judge, Department 10. (See, Exhibit 4.)

28

1 32. The GSR's \$10,000 donation was not the only donation made from an Alex
2 Meruelo entity to Kathleen Sigurdson's campaign in an effort to unseat Judge Sattler.

3 33. In fact, eleven (11) Meruelo-owned and/or controlled companies, nine (9) of
4 which are based in California and share the same address as the Meruelo Group, each made the
5 \$10,000 maximum contribution to Ms. Sigurdson's campaign for Washoe County District Court
6 Judge:

- 7 (1) SLS Las Vegas (Sahara);
- 8 (2) Grand Sierra Resort;
- 9 (3) Meruelo Media Holdings;
- 10 (4) KLOS Radio, LLC;
- 11 (5) KPWR Radio, LLC;
- 12 (6) KDAY Radio, LLC;
- 13 (7) Herman Weissker, Inc.;
- 14 (8) Cantamar Property Management, Inc.;
- 15 (9) Herman Weissker Power, Inc.;
- 16 (10) One Call Construction Services; and
- 17 (11) Doty Bros Equipment Co.

18 (Collectively, "Meruelo-owned entities"). (See, 2020 Contributions & Expenses Reports #1 and
19 #3, attached hereto as Exhibits 3 and 5.)

20 34. The SLS Las Vegas, otherwise known as the Sahara, was purchased by the
21 Meruelo Group in June 2017. SB Gaming, LLC, is a Nevada limited liability company managed
22 by Alex Meruelo. See, Exhibit 6. The dba for SB Gaming, LLC, is Sahara Las Vegas. See,
23 Exhibit 7. On February 21, 2020, the Sahara contributed \$10,000 to Ms. Sigurdson's campaign.
24 See, Exhibit 3.

25 35. Alex Meruelo owns the Meruelo Group, which has its corporate office at 9550
26 Firestone Blvd., Suite 105, Downey, CA 90241. See, Exhibit 8.

27 36. KLOS Radio, LLC's Statement of Information filed with the California Secretary
28 of State on May 16, 2019, lists Meruelo Media, LLC as its Member or Manager and lists the

1 mailing address of the business as 9550 Firestone Blvd., Suite 105, Downey, California 90241.
2 See, Exhibit 9. KLOS Radio, LLC contributed \$10,000 to Ms. Sigurdson's campaign. See,
3 Exhibit 5.

4 37. KPWR Radio, LLC's Statement of Information filed with the California Secretary
5 of State on May 30, 2017, lists Meruelo Media, LLC as its Member or Manager and lists the
6 physical address of the business at 9550 Firestone Blvd., Suite 105, Downey, California 90241.
7 See, Exhibit 10. KPWR Radio, LLC contributed \$10,000 to Ms. Sigurdson's campaign. See,
8 Exhibit 5.

9 38. KDAY Radio, LLC's Statement of Information filed with the California Secretary
10 of State on March 12, 2020, lists Meruelo Media, LLC as its Member or Manager and lists the
11 mailing address for the business as 9550 Firestone Blvd., Suite 105, Downey, California 90241.
12 See, Exhibit 11. KDAY Radio, LLC contributed \$10,000 to Ms. Sigurdson's campaign. See,
13 Exhibit 5.

14 39. Herman Weissker, Inc.'s Statement of Information filed with the California
15 Secretary of State on April 3, 2020, lists Alex Meruelo as the Director and lists the mailing
16 address for the business as 9550 Firestone Blvd., Suite 105, Downey, California 90241. See,
17 Exhibit 12. Herman Weissker, Inc. contributed \$10,000 to Ms. Sigurdson's campaign. See,
18 Exhibit 5.

19 40. Cantamar Property Management, Inc.'s Statement of Information filed with the
20 California Secretary of State on December 16, 2004, lists Alex Meruelo as its Chief Executive
21 Officer, Secretary, Chief Financial Officer, and Director. The mailing address for the business is
22 also listed as 9550 Firestone Blvd., Suite 105, Downey, California 90241. See, Exhibit 13.
23 Cantamar Property Management, Inc. contributed \$10,000 to Ms. Sigurdson's campaign. See,
24 Exhibit 5.

25 41. Herman Weissker Power, Inc.'s Statement of Information filed with the California
26 Secretary of State on August 31, 2020, lists Alex Meruelo as the Director and lists the mailing
27 address for the business as 9550 Firestone Blvd., Suite 105, Downey, California 90241. See,
28

1 Exhibit 14. Herman Weissker Power, Inc. contributed \$10,000 to Ms. Sigurdson's campaign.
2 See, Exhibit 5.

3 42. One Call Construction Services Inc.'s Statement of Information filed with the
4 California Secretary of State on August 31, 2020, lists Alex Meruelo as a Director and lists the
5 mailing address for the business as 9550 Firestone Blvd., Suite 105, Downey, California 90241.
6 See, Exhibit 15. One Call Construction Services Inc. contributed \$10,000 to Ms. Sigurdson's
7 campaign. See, Exhibit 5.

8 43. Doty Bros. Equipment Co.'s Statement of Information filed with the California
9 Secretary of State on August 31, 2020, lists Alex Meruelo as its Director and lists the mailing
10 address for the business as 9550 Firestone Blvd., Suite 105, Downey, California 90241. See,
11 Exhibit 16. Doty Bros. Equipment Co. contributed \$10,000 to Ms. Sigurdson's campaign. See,
12 Exhibit 5.

13 44. In total, the above-referenced Meruelo-owned entities contributed \$110,000 to
14 Ms. Sigurdson's campaign, which raised \$120,985.00 at the time of the subject reporting. Thus,
15 Meruelo-owned entities are reported to have contributed about 91% of Ms. Sigurdson's
16 campaign proceeds.

17 45. The GSR Property prominently displayed numerous signs promoting Kathleen
18 Sigurdson prior to the election. See, Exhibit 17.

19 46. Meruelo-owned entities appear to have devised a scheme to use separate business
20 entities as conduits to funnel approximately \$110,000 to Ms. Sigurdson's campaign. This
21 scheme allowed the Meruelo-owned entities to make combined contributions at more than ten
22 times what a single individual can donate to a campaign under NRS 294A.100.¹

23 47. In addition, I have been informed that Kathleen Sigurdson attended one or more
24 meetings with Alex Meruelo at the Grand Sierra Resort in furtherance of her campaign to unseat
25 Judge Sattler.

26
27
28 ¹AG Opinion No. 94-17 provides that "[a] business entity may give the maximum campaign contribution allowed by
statute irrespective of its relationship to other business organizations."

1 48. The election results were certified by Washoe County, and Ms. Sigurdson
2 ultimately unseated the Honorable Elliot Sattler, who was the presiding judge over this matter for
3 the past eight (8) years.

4 49. On November 16, 2020, the Reno Gazette Journal published an article about the
5 2020 local election results, which included discussion of the “several sizable donations” Alex
6 Meruelo made to Ms. Sigurdson’s campaign. See, Exhibit 18.

7 50. The Honorable Elliot Sattler’s term expires on December 31, 2020, after which
8 Ms. Sigurdson will take the bench in that department.

9 51. The extraordinary campaign contributions made by Meruelo-owned entities were
10 made at a time when Defendants had a vested stake in the outcome of this case. See, Caperton,
11 129 S.Ct. at 2256. At all times relevant hereto, Plaintiffs’ Motion for Punitive Damages
12 remained pending.

13 52. The hearing for punitive damages in this matter has recently been set for
14 January 20, 2021, after Kathleen Sigurdson will be sworn into the department presiding over this
15 case.

16 53. “Just as no man is allowed to be a judge in his own cause, similar fears of bias can
17 arise when—without the other parties’ consent—a man chooses the judge in his own cause. And
18 applying this principle to the judicial election process, there [is] a serious, objective risk of actual
19 bias that require[s] [] recusal.” Id. at 556 U.S. at 886, 129 S.Ct. at 2265.

20 54. The risk that Defendants’ influence engenders actual bias is sufficiently
21 substantial, and it “must be forbidden if the guarantee of due process is to be adequately
22 implemented.” See, Caperton, 129 S.Ct. at 2255.

23 55. The probability of actual bias on the part of the newly-elected judge is “too high
24 to be constitutionally tolerable”, and as such, this case should be transferred to a different
25 department. See, Caperton, 556 U.S. at 876, 129 S.Ct. at 2259.

26 56. I hereby certify that this affidavit is filed in good faith and not interposed for
27 delay.

28

1 I declare under penalty of perjury, upon personal knowledge, that the foregoing is true
2 and correct.

3 **AFFIRMATION**

4 Pursuant to NRS § 239B.030, the undersigned does hereby affirm that the preceding
5 document does not contain the social security number of any person.

6 Executed this 28th day of December, 2020, at Reno, Nevada.

7
8
9 Jarrad C. Miller, Esq.

10 Subscribed and sworn to before
11 me by Jarrad C. Miller, Esq.
12 this 28th day of December, 2020.

13 [Signature]
14 Notary Public



1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5(b), I hereby certify that I am an employee of Robertson, Johnson,
3 Miller & Williamson, 50 West Liberty Street, Suite 600, Reno, Nevada 89501, over the age of
4 18, and not a party within this action. I further certify that on the 28th day of December, 2020, I
5 electronically filed the foregoing **AFFIDAVIT OF BIAS OR PREJUDICE CONCERNING**
6 **KATHLEEN SIGURDSON, ESQ. PURSUANT TO NRS 1.235** with the Clerk of the Court
7 by using the ECF system which served the following parties electronically:

8 David C. McElhinney, Esq.
9 Jennifer K. Hostetler, Esq.
10 Lewis Roca Rothgerber Christie, LLP
11 One East Liberty Street Suite 300
12 Reno, NV 89501
13 *Attorney for Defendants*

F. DeArmond Sharp, Esq.
Stefanie T. Sharp, Esq.
Robison, Sharp Sullivan & Brust
71 Washington Street
Reno, NV 89503
*Attorneys for Receiver Richard M.
Teichner*

14 /s/ Stefanie E. Smith
15 An Employee of Robertson, Johnson,
16 Miller & Williamson
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT INDEX

Ex. No.	Description	Pages
1	Washoe County Bar Association Judicial Survey 2020 Results	2
2	Nevada Independent Article: "Is Justice for Sale in Washoe County?"	4
3	2020 Contributions and Expenses Report #1	8
4	Nevada Secretary of State info re Grand Sierra as Contributor	1
5	2020 Contributions and Expenses Report #3	9
6	Nevada Secretary of State Business Entity Information for SB Gaming, LLC	3
7	Clark County Fictitious Firm Name Info for SB Gaming, LLC	1
8	Contact info for Meruelo Group	1
9	California Secretary of State Statement of Information – KLOS Radio, LLC	1
10	California Secretary of State Statement of Information – KPWR Radio LLC	1
11	California Secretary of State Statement of Information – KDAY Radio, LLC	1
12	California Secretary of State Statement of Information – Herman Weissker, Inc.	3
13	California Secretary of State Statement of Information – Cantamar Property Management, Inc.	2
14	California Secretary of State Statement of Information – Herman Weissker Power, Inc.	3
15	California Secretary of State Statement of Information – One Call Construction Services Inc.	3
16	California Secretary of State Statement of Information – Doty Bros. Equipment Co.	3
17	Photos of Sigurdson signs on GSR property	5
18	RGJ Article: "Washoe District Court Election Results: Sigurdson, Dollinger and Robb win races"	3

EXHIBIT “1”

EXHIBIT “1”

WASHOE COUNTY BAR ASSOCIATION JUDICIAL SURVEY 2020

	Performance Score Average	Should this judge be retained?	
		Yes	No
Supreme Court			
Justice Elissa Cadish	-	85.2%	14.8%
Justice Mark Gibbons	-	-	-
Justice James Hardesty	-	88.5%	11.5%
Justice Ron Parraguirre	-	86.7%	13.3%
Justice Kristine Pickering	-	90.2%	9.8%
Justice Abbi Silver	-	70.0%	30.0%
Justice Lidia Stiglich	-	92.8%	7.2%

Nevada Court of Appeals

Judge Bonnie Bulla	-	68.2%	31.8%
Judge Michael Gibbons	-	84.8%	15.2%
Judge Jerome Tao	-	47.6%	52.4%

General Jurisdiction

Judge Kathleen Drakulich (Dept. 1)	4.5	95.5%	4.5%
Judge Jerry Polaha (Dept. 3)	4.1	86.9%	13.1%
Judge Connie Steinheimer (Dept. 4)	3.9	75.5%	24.5%
Judge Lynne Simons (Dept. 6)	3.9	80.6%	19.4%
Judge Egan Walker (Dept. 7)	4.1	82.5%	17.5%
Judge Barry Breslow (Dept. 8)	3.8	70.9%	29.1%
Judge Scott Freeman (Dept. 9)	4.2	92.2%	7.8%
Judge Elliott Sattler (Dept. 10)	4.6	97.2%	2.8%
Judge David Hardy (Dept. 15)	4.2	87.9%	12.1%

Family Division

Judge Dixie Grossman (Dept. 2)	4.7	97.8%	2.2%
Judge Cynthia Lu (Dept. 5)	4.1	88.1%	11.9%
Judge Chuck Weller (Dept. 11)	2.8	-	-
Judge Sandra Unsworth (Dept. 12)	4.4	94.4%	5.6%
Judge Bridget Robb (Dept. 13)	3.9	78.6%	21.4%
Judge Tamatha Schreinert (Dept. 14)	4.5	100.0%	0.0%

WASHOE COUNTY BAR ASSOCIATION JUDICIAL SURVEY 2020

		Should this judge be retained?	
	Performance Score Average	Yes	No
Court Commissioners			
Discovery Commissioner Wesley Ayres	4.7	-	-
Probate Commissioner Edmund Gorman, Jr.	4.5	-	-

Court Masters - Family Division

Amy Banales	4.4	-	-
Paige Dollinger	4.5	-	-
Alison Testa	4.0	-	-
Greg Shannon	3.2	-	-

Justice of the Peace – Washoe County

Judge E. Alan Tiras (Incline Village)	4.2	69.2%	30.8%
Judge Derek Dreilling, (Reno Dept. 1)	4.3	100.0%	0.0%
Judge Pete Sferrazza, (Reno Dept. 2)	2.8	32.4%	67.6%
Judge Ryan Sullivan, (Reno Dept. 3)	4.1	76.2%	23.8%
Judge Scott Pearson, (Reno, Dept. 4)	4.4	97.3%	2.7%
Judge David Clifton, (Reno, Dept. 5)	4.2	86.8%	13.2%
Judge Pierre Hascheff, (Reno, Dept. 6)	4.2	87.8%	12.2%
Judge Chris Wilson, (Sparks, Dept. 1)	3.8	74.1%	25.9%
Judge Kevin Higgins, (Sparks, Dept. 2)	4.2	94.1%	5.9%
Judge Jessica Longley, (Sparks, Dept. 3)	4.3	89.5%	10.5%
Judge Terry Graham, (Wadsworth)	4.0	87.5%	12.5%

Municipal Courts – Washoe County

Judge Gene Drakulich (Reno, Dept. 1)	4.2	88.9%	11.1%
Judge Shelly O'Neill (Reno, Dept. 2)	4.2	81.0%	19.0%
Judge Dorothy Nash Holmes (Reno, Dept. 3)	4.2	76.9%	23.1%
Judge Tammy Riggs (Reno, Dept. 4)	4.4	84.6%	15.4%
Judge Barbara McCarthy (Sparks, Dept. 1)	4.5	100.0%	0.0%
Judge James Spoo (Sparks, Dept. 2)	3.9	80.0%	20.0%

EXHIBIT “2”

EXHIBIT “2”

IS JUSTICE FOR SALE IN WASHOE COUNTY?



ORRIN J. H. JOHNSON

OCTOBER 25TH, 2020 - 2:00AM

This last week, one of my clients finally got his day in court. He had pled not guilty in January and invoked his right to a speedy trial, which was set for March. Less than two weeks before his case was set to be judged by a jury of his peers, the courthouse closed.

He was not alone – dozens of Washoe County Jail inmates have tried to demand this fundamental right, but have languished in jail while our overreaction to COVID-19 has undermined the most basic foundations of the institutions necessary to maintain a free society.

My case last week was the third jury trial since they resumed last month. The preparation had been intense and impressive, not just from the extraordinary presiding judge, Judge Kathleen Drakulich, but from the entirety of the Second Judicial District Court bench, court staff, and the Washoe County Sheriff's Office (WCSO deputies staff the court as bailiffs). As a result, my client was able to get his day in court, and the wheels of justice rolled forward, as they always must if we are to retain our freedoms and liberties.

Among the judges most involved with all of the planning for resuming was Elliott Sattler, who is the only general jurisdiction District Court judge to face a challenger in Washoe County this cycle. This was somewhat of a surprise, given the fact that Judge Sattler is the highest rated general jurisdiction District Court judge in the courthouse, according to the Washoe County Bar Association's bi-annual survey of lawyers who appear in front of those judges. His work ethic, preparation, and legal knowledge are legendary, but he also takes the time (and always has, even when he was practicing law as a prosecutor) to mentor and train younger lawyers.

I was recently at the home of one of my colleagues, another former public defender who let's just say probably will not be voting for many of the same people I will be. But both of us have an Elliott Sattler sign in our yards, because we know the people of Washoe County – including everyone involved in the criminal justice system – live in a more just society because Sattler sits on the bench.

Nevertheless, being a good judge means sometimes you piss people off, because true “equal justice under the law” doesn’t take into consideration wealth and power. The problem is that when we elect judges, we give wealth and power too much weight on Lady Justice’s scales.

About a year ago, I got a call from someone who was asking (somewhat mysteriously) about my interest in running to be a judge, with an implication that if I was interested, the campaign would be fully funded. It also was clear from that conversation that the mysterious would-be-benefactor was interested in targeting a sitting judge, although it wasn’t until a month or so later that it was made clear to me who that judge was – Judge Sattler. Not desiring to run against both a great judge (and a personal friend and mentor to me, in full candor), I demurred. I later learned that at least half a dozen of my other colleagues had also been contacted to run against Judge Sattler, with all of them refusing until the mystery money man finally got his candidate at the eleventh hour.

Now, I don’t particularly like that we elect judges in head-to-head political campaigns (and no, there is no such thing as a non-political effort to garner votes for someone, even in a non-partisan race). But since that’s our system, I don’t have a problem with a citizen or group of citizens getting together and challenging an incumbent. Such challenges were designed to be a check on bad judges, who from time to time are able to get themselves elected in the first place.

But it requires tremendous diligence on the part of the voting public to ensure that what should be a check on bad judges doesn’t turn into the ability for rich people to buy judicial seats to ensure their court battles go their way (or to punish more independently-minded jurists). The canons of judicial ethics include special rules which severely limit what can be said during a judicial race (which I think is a mistake – if we’re going to have an election, go whole hog with it and let the people decide).

These restrictions, along with a judge's day-to-day duties and performance being invisible to most members of the general public, can turn such races into pure name-recognition/popularity contests, which obviously makes the ability to buy billboards or internet ads a too-important factor.

Judge Sattler's challenger, Kathleen Sigurdson, no doubt received a similar call to the one I got last year. Her funding comes almost entirely from a single source, a California billionaire who bought a casino and thought that entitled him to buy justice, too. I don't know her, but no doubt plenty of her colleagues do – and to date, only four (four!) other lawyers have been willing to come out and endorse her, compared to the endless list from across political and legal spectrums supporting Judge Sattler. Not only did I endorse Judge Sattler months ago, but I contributed \$700 to his campaign.

And when you compare their responses to general questions about their judicial approaches, the contrast between the two gets even more stark. (Sigurdson answers basic questions about why she's running or questions of criminal justice as if she's never actually considered them before, which is flat out bizarre.)

What is most troubling is that Sigurdson's patron is so dishonest about the patronage. Grand Sierra Resort owner Alex Meruelo, through spokesman Andrew Diss, claimed they didn't meet or decide to fund Sigurdson until after she filed, which the calls I and my colleagues received demonstrate to be a flat-out lie. I had been asked to keep that conversation private, which I was happy to do until that silence risked being part of deceiving the public about who was trying to buy "justice," and why.

And as to Sigurdson herself? Well, I have no intention of voting for a judge so obviously for sale, and neither should any of you.

Without the competent, hard-working, and independently-minded judges in the Second Judicial District Court, my client last week either wouldn't have had his day in court at all, or couldn't have counted upon justice being served when that day arrived. Most of our fine sitting judges were either originally appointed, or made their initial run without opposition because they had already received such a broad base of support from colleagues who respected them that any challenge would have been futile.

It is fortunate that in this case, at least, this effort to simply buy a judgeship (and worse, to punish a phenomenal sitting judge for daring to scrupulously apply the law equally to all) is soooooo amateurishly transparent. Not all such efforts are or will be in the future, which is why we should either appoint all of our judges, and/or conduct retention elections only for judges as a public check on the system.

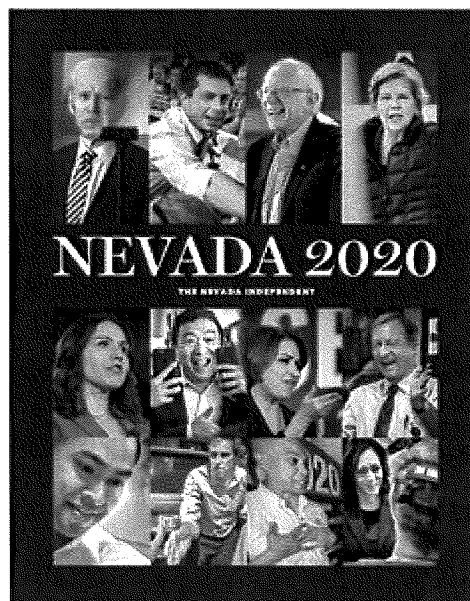
In the meantime, however, we must be vigilant in these types of races, looking beyond mere name-recognition to ensure our system of justice for all remains in competent, independent hands.

Orrin Johnson has been writing and commenting on Nevada and national politics since 2007. He started with an independent blog, First Principles, and was a regular columnist for the Reno Gazette-Journal from 2015-2016. By day, he is a criminal defense attorney in Reno. Follow him on Twitter @orrinjohnson, or contact him at orrin@orrinjohnson.com.

GET OUR MORNING NEWSLETTER,
THE DAILY INDY

Sign Up

Check out our IndySwag store



Nevada 2020 Photo Book - \$19.99

EXHIBIT “3”

EXHIBIT “3”

Print Help? **PRINT****CONTRIBUTIONS AND EXPENSES REPORT****State of Nevada****Kathleen Sigurdson****District Court Judge, District 2, Department 10**

Name

Office (if applicable)

District (if applicable)

3055 Lyon Lane, Washoe Valley, NV, 89704**775-337-0300**

Mailing Address

Telephone No.

k_sigurdson@msn.com

E-Mail Address

Select Appropriate Box(es)

☒ CANDIDATE☐ LEGAL DEFENSE FUND What is this?☐ AMENDED**Report #1 - Due April 15, 2020**

Period: Jan 01, 2020 - Mar 31, 2020

**Report #2 - Due July 15, 2020**

Period: Apr 01, 2020 - Jun 30, 2020

**Report #3 - Due October 15, 2020**

Period: Jul 01, 2020 - Sep 30, 2020

**Report #4 - Due January 15, 2021**

Period: Oct 01, 2020 - Dec 31, 2020

**Annual Filing - Due January 15, 2021**

Period: Jan 01, 2020 - Dec 31, 2020

FILED

Apr 15 2020

**BARBARA K.
CEGAVSKE
SECRETARY OF STATE**

FOR OFFICE USE ONLY

* Report #4 suffices for the 2021 Annual CE Filing only if Report #'s 1, 2, 3, are previously filed this period.

CONTRIBUTIONS SUMMARY

1. Total Monetary Contributions Received in Excess of \$100
2. Total Monetary Contributions in the Form of Loans Guaranteed by a 3rd-Party in Excess of \$100
3. Total Monetary Contributions in the Form of Loans that were Forgiven in Excess of \$100
4. Total Amount of Written Commitments for Contributions in Excess of \$100
5. Total Value of In Kind Contributions in Excess of \$100
6. Total Value of Written Commitments for In Kind Contributions in Excess of \$100
7. Total Amount of all Contributions of \$100 or less
8. Total Amount of All Contributions (Add Lines 1 through 7)

This Period	Cumulative From Beginning of Report Period #1 Through End of This Reporting Period
\$ 23,000.00	\$ 23,000.00
\$ 0.00	\$0.00
\$ 0.00	\$0.00
\$ 0.00	\$0.00
\$ 0.00	\$0.00
\$ 0.00	\$0.00
\$ 0.00	\$0.00
\$ 23,000.00	\$23,000.00

EXPENSES SUMMARY

9. Total Monetary Expenses Paid in Excess of \$100
10. Total Value In Kind Expenses in Excess of \$100
11. Total Amount of all Expenses of \$100 or less
12. Total Amount of All Expenses (Add Lines 9 through 11)

\$ 8,627.36	\$8,627.36
\$ 0.00	\$0.00
\$ 0.00	\$0.00
\$ 8,627.36	\$8,627.36

ENDING FUND BALANCE

13. Fund balance at the end of the reporting period

\$14372.64**AFFIRMATION**☒ I Declare Under Penalty of Perjury That the Foregoing is True and Correct.

AND

☒ I have agreed to the following terms and conditions:

I declare, under penalty of perjury or under an oath to God, that the information I submitted herein to the Secretary of State for the State of Nevada is true and correct, and is not submitted for any improper purpose, and that I am authorized to submit the information, and to the best of my knowledge complies with NRS Chapter 294A. I have reviewed the NRS 225.083 Notice. I understand it is unlawful to submit any illegal, unauthorized, fraudulent, forged, deceptive, defamatory, illicit, or improper information, as defined by state and federal law, to the Secretary of State, and agree to indemnify the Secretary of State, and any other parties entitled thereto, for any damages incurred for any unlawful, unauthorized, fraudulent, forged, deceptive, defamatory, illicit, or improper information, as defined by the federal and state law, submitted to the Secretary of State by my use of this electronic filing system. I further understand that I may be subject to criminal (NRS 239.330) and/or civil (NRS 225.084) penalties for submitting any unlawful unauthorized, fraudulent, forged, deceptive, defamatory, illicit, or improper information, as defined by federal and state law. I understand and agree that all information submitted is the property of the Secretary of State, and may be monitored for all lawful purposes. I further understand that during such monitoring, all information, including personal information placed on this system, may be examined, copied, and used for any authorized purpose. By submitting this report I intend to identify myself as the authorized person signing this document and with the present intent to authenticate my signature as such.

Kathleen Sigurdson**04/15/2020**

Signature

Date

R.App. 000549

MONETARY CONTRIBUTIONSReport Period **# 1****Kathleen Sigurdson****District Court Judge, District 2, Department 10**


Name (print)

Office (if applicable)

District (if applicable)

**MONETARY CONTRIBUTIONS IN EXCESS OF \$100 OR,
WHEN ADDED TOGETHER FROM ONE CONTRIBUTOR, THAT EXCEED \$100**

(Transfer Total Amount of All Monetary Contributions to Lines 1, 2, or 3, As Applicable, of Contributions Summary)

<u>NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO MADE CONTRIBUTION</u>	<u>DATE OF CONTRIBUTION</u> 	<u>AMOUNT OF CONTRIBUTION</u>	<u>CHECK HERE IF LOAN</u>	<u>NAME AND ADDRESS OF 3rd PARTY IF LOAN GUARANTEED BY 3rd PARTY</u>	<u>NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO FORGAVE THE LOAN, IF DIFFERENT THAN CONTRIBUTOR</u>
Grand Sierra 2500 E. Second St. Reno, NV 89595	01/31/2020	\$10,000.00			
Sahara 2535 Las Vegas Blvd S Las Vegas, NV 89109	02/21/2020	\$10,000.00			
Andrew Dannnin 888 Timber Walk Drive Henderson, NV 89052	03/13/2020	\$2,500.00			
Jason Mills 2200 S Rancho Dr Ste 140 Las Vegas, NV 89102	03/13/2020	\$500.00			

WRITTEN COMMITMENTSReport Period **# 1****Kathleen Sigurdson****District Court Judge, District 2, Department 10**


Name (print)

Office (if applicable)

District (if applicable)

**WRITTEN COMMITMENTS FOR CONTRIBUTIONS IN EXCESS OF \$100 OR,
WHEN ADDED TOGETHER FROM ONE ENTITY, THAT EXCEED \$100**

(Transfer Total Amount of All Written Commitments to Line 4 of Contributions Summary)

<u>NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO MADE THE COMMITMENT</u>	<u>DATE OF COMMITMENT</u> 	<u>AMOUNT OF COMMITMENT</u>

R.App. 000550

IN KIND CONTRIBUTIONSReport Period **# 1****Kathleen Sigurdson****District Court Judge, District 2, Department 10**

Name (print)

Office (if applicable)

District (if applicable)

**IN KIND CONTRIBUTIONS IN EXCESS OF \$100 OR,
 WHEN ADDED TOGETHER FROM ONE CONTRIBUTOR, THAT EXCEED \$100**
 (Transfer Total Value of All In Kind Contributions to Line 5 of Contributions Summary)

<u>NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO MADE IN KIND CONTRIBUTION</u>	<u>DATE OF IN KIND CONTRIBUTION</u>	<u>DESCRIPTION OF IN KIND CONTRIBUTION</u>	<u>VALUE OR COST OF IN KIND CONTRIBUTION</u>	<u>CHECK HERE IF LOAN</u>	<u>NAME AND ADDRESS OF 3rd PARTY IF LOAN GUARANTEED BY 3rd PARTY</u>	<u>NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO FORGAVE THE LOAN, IF DIFFERENT THAN CONTRIBUTOR</u>

R.App. 000551

**WRITTEN COMMITMENTS FOR IN KIND
CONTRIBUTIONS**
Report Period **# 1**
Kathleen Sigurdson
District Court Judge, District 2, Department 10


Name (print)

Office (if applicable)

District (if applicable)

**WRITTEN COMMITMENTS FOR IN KIND CONTRIBUTIONS IN EXCESS OF \$100 OR,
WHEN ADDED TOGETHER FROM ONE ENTITY, THAT EXCEED \$100**

(Transfer Total Value of All In Kind Written Commitments to Line 6 of Contributions Summary)

<u>NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO MADE THE IN KIND WRITTEN COMMITMENT</u>	<u>DATE OF IN KIND WRITTEN COMMITMENT</u> 	<u>VALUE OF IN KIND WRITTEN COMMITMENT</u>

R.App. 000552

EXPENSE CATEGORIESReport Period **# 1****Kathleen Sigurdson****District Court Judge, District 2, Department 10**

Name (print)

Office (if applicable)

District (if applicable)

EXPENSE CATEGORIES (NRS 294A.365)

CATEGORIES	CODE
Office expenses	A
Expenses related to volunteers	B
Expenses related to travel	C
Expenses related to advertising	D

R.App. 000553

Expenses related to paid staff	E
Expenses related to consultants	F
Expenses related to polling	G
Expenses related to special events	H
Expenses related to legal defense fund	I
Goods and services provided in kind for which money would otherwise have been paid	J
Contributions made to: (i) another candidate; (ii) a nonprofit corporation that is registered or required to be registered pursuant to NRS 294A.225; (iii) a PAC that is registered or required to be registered pursuant to NRS 294A.230; or (iv) a Recall Committee that is registered or required to be registered pursuant to NRS 294A.250	K
Fees for filing declarations of candidacy or acceptances of candidacy	L
Repayments or forgiveness of loans	M
Disposal of unspent contributions pursuant to NRS 294A.160	N
Other miscellaneous expenses	O

¹ NRS 294A.362 requires "In Kind" contributions and expenses to be reported on a separate form, which is attached hereto.

MONETARY EXPENSESReport Period **# 1****Kathleen Sigurdson****District Court Judge, District 2, Department 10**

Name (print)

Office (if applicable)

District (if applicable)

MONETARY EXPENSES IN EXCESS OF \$100

(Transfer Total Amount of All Campaign Expenses to Line 9 of Expenses Summary)

<u>NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO RECEIVED THE PAYMENT FOR THE EXPENSE</u>	<u>CATEGORY</u> (NRS 294A.365)	<u>DATE OF EXPENSE</u>	<u>AMOUNT OF EXPENSE</u>
PPP Polling 2912 Highwood Blvd Ste 201 Raleigh, NC 27604	G	02/24/2020	\$5,000.00
Tallac Strategies 1280 Terminal Way 35 Reno, NV 89502	E	03/05/2020	\$2,727.36
Nicholas Powell 3510 Comstock Dr Reno, NV 89512	F	03/06/2020	\$400.00
Hasbara 321 S. Arlington Reno, NV 89501	F	03/06/2020	\$500.00

IN KIND EXPENSESReport Period **# 1****Kathleen Sigurdson****District Court Judge, District 2, Department 10**


Name (print)

Office (if applicable)

District (if applicable)

IN KIND EXPENSES IN EXCESS OF \$100

(Transfer Total Value of All In-Kind Expenses to Line 10 of Expenses Summary)

<u>NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO RECEIVED THE IN KIND GOOD OR SERVICE</u>	<u>DESCRIPTION OF IN KIND EXPENSE</u>	<u>DATE OF IN KIND EXPENSE</u> 	<u>VALUE OR COST OF IN KIND EXPENSE</u>

EL201

Revised: 8-13-13

NRS 294A.120; 294A.125;

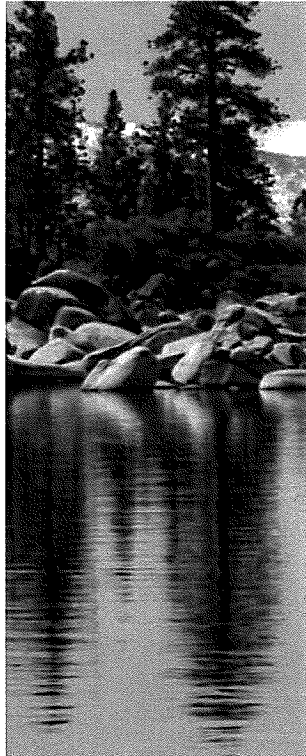
294A.160; 294A.200;

294A.362; 294A.373

R.App. 000555

EXHIBIT “4”

EXHIBIT “4”



Grand Sierra

[Back to Search](#)

Entity Type Contributor
Address 2500 E. Second St.
Reno, NV 89595
Total Contributions Amount \$17,528.00

[View all contributions from contributors with the same or similar name](#)
[View all contributions from contributors with the same or similar address](#)

Contributions Made by Grand Sierra

4 contributions found totaling \$17,528.00.

Contribution Date	File Date	Contribution Amount	Contribution Type	Recipient	Report
1/31/2020	4/15/2020	\$10,000.00	Monetary Contribution	Kathleen Sigurdson	2020 CE Report 1
12/11/2018	1/15/2019	\$1,528.00	In Kind Written Commitment	Bonnie Weber	2018 CE Report 5
12/27/2017	5/16/2018	\$5,000.00	Monetary Contribution	Jason Frierson	2018 Annual CE Filing (Amended)
7/20/2016	1/16/2017	\$1,000.00	Monetary Contribution	Amber Joiner	2016 CE Report 3 (Amended)

Export results to: [Excel](#) [CSV](#) [PDF](#)

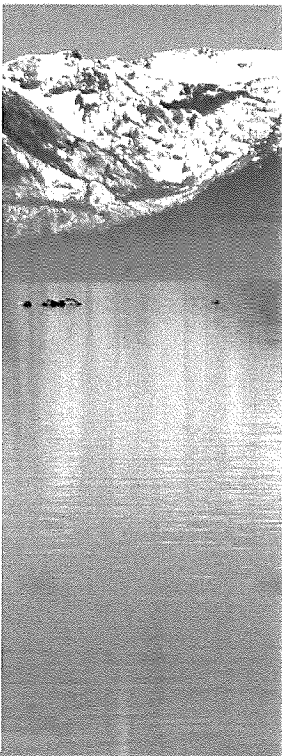


EXHIBIT “5”

EXHIBIT “5”

Print Help? **PRINT****CONTRIBUTIONS AND EXPENSES REPORT****State of Nevada****Kathleen Sigurdson****District Court Judge, District 2, Department 10**

Name

Office (if applicable)

District (if applicable)

3055 Lyon Lane, Washoe Valley, NV, 89704**775-337-0300**

Mailing Address

Telephone No.

k_sigurdson@msn.com

E-Mail Address

Select Appropriate Box(es)

☒ **CANDIDATE**☐ **LEGAL DEFENSE FUND** What is this?☐ **AMENDED**

- ☐ **Report #1 - Due April 15, 2020**
Period: Jan 01, 2020 - Mar 31, 2020
- ☐ **Report #2 - Due July 15, 2020**
Period: Apr 01, 2020 - Jun 30, 2020
- ☒ **Report #3 - Due October 15, 2020**
Period: Jul 01, 2020 - Sep 30, 2020
- ☐ **Report #4 - Due January 15, 2021**
Period: Oct 01, 2020 - Dec 31, 2020
- ☐ **Annual Filing - Due January 15, 2021**
Period: Jan 01, 2020 - Dec 31, 2020

FILED

Oct 15 2020

**BARBARA K.
CEGAVSKE
SECRETARY OF STATE**

FOR OFFICE USE ONLY

* Report #4 suffices for the 2021 Annual CE Filing only if Report #'s 1, 2, 3, are previously filed this period.

CONTRIBUTIONS SUMMARY

	This Period	Cumulative From Beginning of Report Period #1 Through End of This Reporting Period
1. Total Monetary Contributions Received in Excess of \$100	\$ 95,200.00	\$ 120,000.00
2. Total Monetary Contributions in the Form of Loans Guaranteed by a 3rd-Party in Excess of \$100	\$ 0.00	\$ 0.00
3. Total Monetary Contributions in the Form of Loans that were Forgiven in Excess of \$100	\$ 0.00	\$ 0.00
4. Total Amount of Written Commitments for Contributions in Excess of \$100	\$ 0.00	\$ 0.00
5. Total Value of In Kind Contributions in Excess of \$100	\$ 0.00	\$ 0.00
6. Total Value of Written Commitments for In Kind Contributions in Excess of \$100	\$ 0.00	\$ 0.00
7. Total Amount of all Contributions of \$100 or less	\$ 885.00	\$ 985.00
8. Total Amount of All Contributions (Add Lines 1 through 7)	\$ 96,085.00	\$ 120,985.00

EXPENSES SUMMARY

9. Total Monetary Expenses Paid in Excess of \$100	\$ 118,367.95	\$ 135,777.75
10. Total Value In Kind Expenses in Excess of \$100	\$ 0.00	\$ 0.00
11. Total Amount of all Expenses of \$100 or less	\$ 23.70	\$ 108.40
12. Total Amount of All Expenses (Add Lines 9 through 11)	\$ 118,391.65	\$ 135,886.15

ENDING FUND BALANCE

13. Fund balance at the end of the reporting period	\$ 0.00
---	----------------

AFFIRMATION☒ **I Declare Under an Oath to God that the Forgoing is True and Correct**** A declaration under an oath to God is subject to the same penalties as declaration under penalty of perjury
AND☒ **I have agreed to the following terms and conditions:**

I declare, under penalty of perjury or under an oath to God, that the information I submitted herein to the Secretary of State for the State of Nevada is true and correct, and is not submitted for any improper purpose, and that I am authorized to submit the information, and to the best of my knowledge complies with NRS Chapter 294A. I have reviewed the NRS 225.083 Notice. I understand it is unlawful to submit any illegal, unauthorized, fraudulent, forged, deceptive, defamatory, illicit, or improper information, as defined by state and federal law, to the Secretary of State, and agree to indemnify the Secretary of State, and any other parties entitled thereto, for any damages incurred for any unlawful, unauthorized, fraudulent, forged, deceptive, defamatory, illicit, or improper information, as defined by the federal and state law, submitted to the Secretary of State by my use of this electronic filing system. I further understand that I may be subject to criminal (NRS 239.330) and/or civil (NRS 225.084) penalties for submitting any unlawful unauthorized, fraudulent, forged, deceptive, defamatory, illicit, or improper information, as defined by federal and state law. I understand and agree that all information submitted is the property of the Secretary of State, and may be monitored for all lawful purposes. I further understand that during such monitoring, all information, including personal information placed on this system, may be examined, copied, and used for any authorized purpose. By submitting this report I intend to identify myself as the authorized person signing this document and with the present intent to authenticate my signature as such.

Kathleen Sigurdson**10/15/2020**

Signature

Date

**MONETARY
CONTRIBUTIONS**Report Period **# 3****Kathleen Sigurdson****District Court Judge, District 2, Department 10**

Name (print)

Office (if applicable)

District (if applicable)

**MONETARY CONTRIBUTIONS IN EXCESS OF \$100 OR,
WHEN ADDED TOGETHER FROM ONE CONTRIBUTOR, THAT EXCEED \$100**

(Transfer Total Amount of All Monetary Contributions to Lines 1, 2, or 3, As Applicable, of Contributions Summary)

NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO MADE CONTRIBUTION	DATE OF CONTRIBUTION	AMOUNT OF CONTRIBUTION	CHECK HERE IF LOAN	NAME AND ADDRESS OF 3rd PARTY IF LOAN GUARANTEED BY 3rd PARTY	NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO FORGAVE THE LOAN, IF DIFFERENT THAN CONTRIBUTOR
Anne Sigurdson 4023 Clover Creek Reno, NV 89519	08/07/2020	\$5,000.00			
Ellen Driscoll 1195 Sherwood Dr. Reno, NV 89509	08/12/2020	\$50.00			
Donna Blackmore 1595 Wheatgrass Dr Reno, NV 89509	08/12/2020	\$50.00			
Lorne Butner 1471 Fraun Court Reno, NV 89519	08/13/2020	\$100.00			
D. Jean Myles 2055 Regent St. Reno, NV 89509	08/13/2020	\$200.00			
Kenneth Meyer 1270 Meridian Ranch Dr Reno, NV 89523	08/17/2020	\$100.00			
Linda Turner 1340 Walking Stick Way Reno, NV 89523	08/19/2020	\$25.00			
Heather Butler Skin Care LLC 465 W. Peckham Reno, NV 89509	08/20/2020	\$100.00			
Jane Cates 567 Mogul Mountain Dr Reno, NV 89523	08/20/2020	\$100.00			
Marta Elis 1045 W. Waverly Dr. Reno, NV 89519	08/27/2020	\$50.00			
J. A. Karhohs 4855 Lakeridge Reno, NV 89509	09/01/2020	\$50.00			
Douglas Ramseth 3333 Menlo Ct Reno, NV 89509	09/05/2020	\$50.00			
Meruelo Media Holdings 4975 W. Pico Blvd Los Angeles, CA 90019	09/14/2020	\$10,000.00			
KLOS Radio, LLC 2600 W. Olive St. Ste 800 Burbank, CA 91505	09/14/2020	\$10,000.00			
KPWR Radio, LLC 2600 W. Olive St. Ste 800 Burbank, CA 91505	09/14/2020	\$10,000.00			
KDAY Radio, LLC 2600 W. Olive St. Ste 800 Burbank, CA 91505	09/14/2020	\$10,000.00			
Herman Weissker, Inc 1645 Brown Ave. Riverside, CA 92509	09/14/2020	\$10,000.00			
Cantamar Property Mgmt, Inc. 9550 Firestone Blvd. #105 Downey, CA 90241	09/14/2020	\$10,000.00			
Herman Weissker Power, Inc.	09/14/2020	\$10,000.00			R.App. 000561

9550 Firestone Blvd. #105 Downey, CA 90241					
<u>One Call Construction Services</u> 9550 Firestone Blvd. #105 Downey, CA 90241	09/14/2020	\$10,000.00			
<u>Doty Bros Equipment Co</u> 11232 E. Firestone Blvd Norwalk, CA 90650	09/14/2020	\$10,000.00			
<u>Jane Grossman</u> 1665 Green Ash Rd Reno, NV 89511	09/15/2020	\$90.00			
<u>Dave Cherry</u> 4465 Boca Way Spc 102 Reno, NV 89502	09/19/2020	\$20.00			
<u>Denise Brooks</u> 1148 Spartan Ave. Carson City, NV 89701	09/21/2020	\$50.00			
<u>Mary Sherman</u> 1270 Meridian Ranch Dr Reno, NV 89523	09/30/2020	\$50.00			

WRITTEN COMMITMENTS

Report Period # 3

Kathleen Sigurdson

District Court Judge, District 2, Department 10


Name (print)

Office (if applicable)

District (if applicable)

**WRITTEN COMMITMENTS FOR CONTRIBUTIONS IN EXCESS OF \$100 OR,
WHEN ADDED TOGETHER FROM ONE ENTITY, THAT EXCEED \$100**

(Transfer Total Amount of All Written Commitments to Line 4 of Contributions Summary)

NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO MADE THE COMMITMENT	DATE OF COMMITMENT 	AMOUNT OF COMMITMENT

R.App. 000562

IN KIND CONTRIBUTIONSReport Period **# 3****Kathleen Sigurdson****District Court Judge, District 2, Department 10**

Name (print)

Office (if applicable)

District (if applicable)

**IN KIND CONTRIBUTIONS IN EXCESS OF \$100 OR,
WHEN ADDED TOGETHER FROM ONE CONTRIBUTOR, THAT EXCEED \$100**

(Transfer Total Value of All In Kind Contributions to Line 5 of Contributions Summary)

<u>NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO MADE IN KIND CONTRIBUTION</u>	<u>DATE OF IN KIND CONTRIBUTION</u> ↑	<u>DESCRIPTION OF IN KIND CONTRIBUTION</u>	<u>VALUE OR COST OF IN KIND CONTRIBUTION</u>	<u>CHECK HERE IF LOAN</u>	<u>NAME AND ADDRESS OF 3rd PARTY IF LOAN GUARANTEED BY 3rd PARTY</u>	<u>NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO FORGAVE THE LOAN, IF DIFFERENT THAN CONTRIBUTOR</u>

R.App- 000563

**WRITTEN COMMITMENTS FOR IN KIND
CONTRIBUTIONS**
Report Period **# 3**
Kathleen Sigurdson
District Court Judge, District 2, Department 10


Name (print)

Office (if applicable)

District (if applicable)

**WRITTEN COMMITMENTS FOR IN KIND CONTRIBUTIONS IN EXCESS OF \$100 OR,
WHEN ADDED TOGETHER FROM ONE ENTITY, THAT EXCEED \$100**

(Transfer Total Value of All In Kind Written Commitments to Line 6 of Contributions Summary)

<u>NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO MADE THE IN KIND WRITTEN COMMITMENT</u>	<u>DATE OF IN KIND WRITTEN COMMITMENT</u> 	<u>VALUE OF IN KIND WRITTEN COMMITMENT</u>

R.App. 000564

EXPENSE CATEGORIESReport Period **# 3****Kathleen Sigurdson****District Court Judge, District 2, Department 10**

Name (print)

Office (if applicable)

District (if applicable)

EXPENSE CATEGORIES (NRS 294A.365)

CATEGORIES	CODE
Office expenses	A
Expenses related to volunteers	B
Expenses related to travel	C
Expenses related to advertising	D
Expenses related to paid staff	E
Expenses related to consultants	F
Expenses related to polling	G
Expenses related to special events	H

R.App. 000565

Expenses related to legal defense fund	I
Goods and services provided in kind for which money would otherwise have been paid	J
Contributions made to: (i) another candidate; (ii) a nonprofit corporation that is registered or required to be registered pursuant to NRS 294A.225; (iii) a PAC that is registered or required to be registered pursuant to NRS 294A.230; or (iv) a Recall Committee that is registered or required to be registered pursuant to NRS 294A.250	K
Fees for filing declarations of candidacy or acceptances of candidacy	L
Repayments or forgiveness of loans	M
Disposal of unspent contributions pursuant to NRS 294A.160	N
Other miscellaneous expenses	O

1 NRS 294A.362 requires "In Kind" contributions and expenses to be reported on a separate form, which is attached hereto.

MONETARY EXPENSESReport Period **# 3****Kathleen Sigurdson****District Court Judge, District 2, Department 10**

Name (print)

Office (if applicable)

District (if applicable)

MONETARY EXPENSES IN EXCESS OF \$100

(Transfer Total Amount of All Campaign Expenses to Line 9 of Expenses Summary)

<u>NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO RECEIVED THE PAYMENT FOR THE EXPENSE</u>	<u>CATEGORY (NRS 294A.365)</u>	<u>DATE OF EXPENSE</u>	<u>AMOUNT OF EXPENSE</u>
Tallac Strategies 1280 Terminal Way #35 Reno, NV 89502	F	07/25/2020	\$5,650.00
	F	09/06/2020	\$8,679.08
Nevada State Bank PO Box 990 LAS VEGAS, NV 89125	O	07/30/2020	\$2.50
	O	08/30/2020	\$2.50
	O	09/30/2020	\$2.50
Anedot 4017 Buena Vist St #109 Dallas, TX 75204	O	08/13/2020	\$2.30
	O	08/18/2020	\$4.30
	O	09/16/2020	\$3.90
	O	09/20/2020	\$1.10
	O	09/22/2020	\$2.30
	O	09/30/2020	\$2.30
Nevada State Democratic Party 2320 Paseo Del Prado Ste B107 Las Vegas, NV 89102	O	09/13/2020	\$1,500.00
Benjamin Challinor 627 C Street Apt R Sparks, NV 89431	O	09/14/2020	\$250.00
Ace Studios 3500 Lakeside Ct Suite 214 Reno, NV 89509	F	09/15/2020	\$4,000.00
	F	09/21/2020	\$175.87
	F	09/23/2020	\$7,800.00
Reno Type 1020 S Rock Blvd Reno, NV 89502	D	09/15/2020	\$5,000.00
Spectrum PO Box 94188 Palatine, IL 60094	D	09/18/2020	\$24,922.00
			R.App. 000566

<u>KTVN</u> PO Box 7220 Reno, NV 89510	D	09/18/2020	\$20,689.00
<u>KRNV</u> 1790 Vassar St. Reno, NV 89502	D	09/18/2020	\$12,835.00
<u>KOLO</u> P.O . BOX 10000 Reno, NV 89502	D	09/18/2020	\$16,567.00
<u>Gatusso Coalition</u> 615 Riverside Drive Ste. 201 Reno, NV 89502	F	09/18/2020	\$4,800.00
<u>Public Policy Polling</u> 2912 Highwoods Blvd. Suite 201 Raleigh, NC 27604	O	09/21/2020	\$5,500.00

IN KIND EXPENSES

Report Period **# 3**

Kathleen Sigurdson

District Court Judge, District 2, Department 10

Name (print) _____

Office (if applicable)

District (if applicable)

IN KIND EXPENSES IN EXCESS OF \$100

(Transfer Total Value of All In-Kind Expenses to Line 10 of Expenses Summary)

<u>NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO RECEIVED THE IN KIND GOOD OR SERVICE</u>	<u>DESCRIPTION OF IN KIND EXPENSE</u>	<u>DATE OF IN KIND EXPENSE</u>	<u>VALUE OR COST OF IN KIND EXPENSE</u>

R App. 000567

EL201

Revised: 8-13-13

NRS 294A.120; 294A.125;

294A.160; 294A.200;

294A.362; 294A.373

EXHIBIT “6”

EXHIBIT “6”

ENTITY INFORMATION**ENTITY INFORMATION****Entity Name:**

SB GAMING, LLC

Entity Number:

E0078872014-5

Entity Type:

Domestic Limited-Liability Company (86)

Entity Status:

Active

Formation Date:

02/13/2014

NV Business ID:

NV20141104979

Termination Date:

Perpetual

Annual Report Due Date:

2/28/2021

Series LLC:**Restricted LLC:****REGISTERED AGENT INFORMATION**

Name of Individual or Legal Entity:

C T CORPORATION SYSTEM

Status:

Active

CRA Agent Entity Type:**Registered Agent Type:**

Commercial Registered Agent

NV Business ID:

NV20191497453

Office or Position:**Jurisdiction:**

DELAWARE

Street Address:

701 S CARSON ST STE 200, Carson City, NV, 89701, USA

Mailing Address:**Individual with Authority to Act:**

MATTHEW TAYLOR

Fictitious Website or Domain Name:**OFFICER INFORMATION**☐ **VIEW HISTORICAL DATA**

Title	Name	Address	Last Updated	Status
Manager	Alex Meruelo	2500 E. 2nd Street, Reno, NV, 89595, USA	01/14/2020	Active

Page 1 of 1, records 1 to 1 of 1

[Filing History](#)[Name History](#)[Mergers/Conversions](#)

[Return to Search](#)

[Return to Results](#)

EXHIBIT “7”


EXHIBIT “7”


Home (/AcclaimWeb/) > FBN (/AcclaimWeb/FBN) > Search Type FFN By Name (/AcclaimWeb/FBN/SearchTypeFbnByName)

FFN Name Search

FFN Name

Date Range Last 3 Years ▼

From Date 11/16/2017 


To Date 11/16/2020 

Select DocTypes...

Document Types

[Export to CSV \(/AcclaimWeb/Search/ExportCsv\)](/AcclaimWeb/Search/ExportCsv)

1 20 ▼ items per page

1 - 4 of 4 items 

Record (/AcclaimWe...	First Direct Name (/Ac...	First Indir...	Instrument # (/A...	Record Date (/A...	Document...
Order	SAHARA LAS VEGAS	LAS VEGAS RESORT HOLDINGS, LLC	201908151012520	08/15/2019	FFN CERTIFICATE
Order	SAHARA LAS VEGAS	SB GAMING, LLC	201908151012524	08/15/2019	FFN CERTIFICATE
Order	SAHARA LAS VEGAS DODGE, CHRYSLER JEEP RAM	CHAPMAN'S LAS VEGAS DODGE LIMITED LIABILITY COMPANY	201908021011860	08/02/2019	FFN CERTIFICATE
Order	SAHARA LAS VEGAS HOTEL AND CASINO	LAS VEGAS RESORT HOLDINGS, LLC	201908151012522	08/15/2019	FFN CERTIFICATE

1 20 ▼ items per page


1 - 4 of 4 items  (/AcclaimWeb/Search/GetSearchResults)

EXHIBIT “8”

EXHIBIT “8”

Corporate Office
9550 Firestone Blvd.
Suite 105

Downey, CA 90241

(o) 562.745.2300

(f) 562.745.2341

EXHIBIT “9”

EXHIBIT “9”



Secretary of State
Statement of Information
(Limited Liability Company)

LLC-12

19-B92446

FILED

In the office of the Secretary of State
of the State of California

MAY 16, 2019

This Space For Office Use Only

IMPORTANT — Read instructions **before completing this form.**

Filing Fee — \$20.00

Copy Fees — First page \$1.00; each attachment page \$0.50;
Certification Fee — \$5.00 plus copy fees

1. Limited Liability Company Name (Enter the exact name of the LLC. If you registered in California using an alternate name, see instructions.)

KLOS RADIO, LLC

2. 12-Digit Secretary of State File Number

201910010209

3. State, Foreign Country or Place of Organization (only if formed outside of California)

CALIFORNIA

4. Business Addresses

a. Street Address of Principal Office - Do not list a P.O. Box 4975 W PICO BLVD	City (no abbreviations) LOS ANGELES	State CA	Zip Code 90019
b. Mailing Address of LLC, if different than item 4a 9550 FIRESTONE BLVD, SUITE 105	City (no abbreviations) Downey	State CA	Zip Code 90241
c. Street Address of California Office, if Item 4a is not in California - Do not list a P.O. Box 4975 W PICO BLVD	City (no abbreviations) LOS ANGELES	State CA	Zip Code 90019

5. Manager(s) or Member(s)

If no **managers** have been appointed or elected, provide the name and address of each **member**. At least one name **and** address must be listed. If the manager/member is an individual, complete Items 5a and 5c (leave Item 5b blank). If the manager/member is an entity, complete Items 5b and 5c (leave Item 5a blank). Note: The LLC cannot serve as its own manager or member. If the LLC has additional managers/members, enter the name(s) and addresses on Form LLC-12A (see instructions).

a. First Name, if an individual - Do not complete Item 5b	Middle Name	Last Name	Suffix
b. Entity Name - Do not complete Item 5a MERUELO MEDIA, LLC			
c. Address 4975 W PICO BLVD	City (no abbreviations) LOS ANGELES	State CA	Zip Code 90019

6. Service of Process (Must provide either Individual **OR** Corporation.)

INDIVIDUAL — Complete Items 6a and 6b only. Must include agent's full name and California street address.

a. California Agent's First Name (if agent is not a corporation) MARIO	Middle Name A	Last Name TAPANES	Suffix
b. Street Address (if agent is not a corporation) - Do not enter a P.O. Box 9550 FIRESTONE BLVD, SUITE 105	City (no abbreviations) DOWNEY	State CA	Zip Code 90241

CORPORATION — Complete Item 6c only. Only include the name of the registered agent Corporation.

c. California Registered Corporate Agent's Name (if agent is a corporation) - Do not complete Item 6a or 6b

7. Type of Business

a. Describe the type of business or services of the Limited Liability Company

RADIO BROADCASTING

8. Chief Executive Officer, if elected or appointed

a. First Name	Middle Name	Last Name	Suffix
b. Address	City (no abbreviations)	State	Zip Code

9. The Information contained herein, including any attachments, is true and correct.

05/16/2019

MARIO A TAPANES

Counsel

Date

Type or Print Name of Person Completing the Form

Title

Signature

Return Address (Optional) (For communication from the Secretary of State related to this document, or if purchasing a copy of the filed document) enter the name of a person or company and the mailing address. This information will become public when filed. SEE INSTRUCTIONS BEFORE COMPLETING.)

Name:

Company:

Address:

City/State/Zip:

EXHIBIT “10”

EXHIBIT “10”



Secretary of State
Statement of Information
(Limited Liability Company)

LLC-12

60

17-470433

FILED
Secretary of State
State of California

MAY 30 2017

IMPORTANT — Read instructions before completing this form.

Filing Fee — \$20.00

Copy Fees — First page \$1.00; each attachment page \$0.50;
Certification Fee — \$5.00 plus copy fees

This Space For Office Use Only

1. **Limited Liability Company Name** (Enter the exact name of the LLC. If you registered in California using an alternate name, see instructions.)

KPWR RADIO LLC

2. **12-Digit Secretary of State File Number**

201713510159

3. **State, Foreign Country or Place of Organization** (only if formed outside of California)

4. Business Addresses

a. **Street Address of Principal Office** - Do not list a P.O. Box

9550 FIRESTONE BLVD, SUITE 105

City (no abbreviations)

DOWNEY

State

CA

Zip Code

90241

b. **Mailing Address of LLC, if different than Item 4a**

City (no abbreviations)

State

Zip Code

c. **Street Address of California Office, if Item 4a is not in California** - Do not list a P.O. Box

City (no abbreviations)

State

CA

Zip Code

5. Manager(s) or Member(s)

If no managers have been appointed or elected, provide the name and address of each member. At least one name and address must be listed. If the manager/member is an individual, complete Items 5a and 5c (leave Item 5b blank). If the manager/member is an entity, complete Items 5b and 5c (leave Item 5a blank). Note: The LLC cannot serve as its own manager or member. If the LLC has additional managers/members, enter the name(s) and addresses on Form LLC-12A (see instructions).

a. **First Name, if an individual** - Do not complete Item 5b

Middle Name

Last Name

Suffix

b. **Entity Name** - Do not complete Item 5a

MERUELO MEDIA, LLC

c. **Address**

9550 FIRESTONE BLVD, SUITE 105

City (no abbreviations)

DOWNEY

State

CA

Zip Code

90241

6. Service of Process (Must provide either Individual OR Corporation.)

INDIVIDUAL — Complete Items 6a and 6b only. Must include agent's full name and California street address.

a. **California Agent's First Name** (if agent is not a corporation)

MARIO

Middle Name

A

Last Name

TAPANES

Suffix

b. **Street Address** (if agent is not a corporation) - Do not enter a P.O. Box

9550 FIRESTONE BLVD, SUITE 105

City (no abbreviations)

DOWNEY

State

CA

Zip Code

90241

CORPORATION — Complete Item 6c only. Only include the name of the registered agent Corporation.

c. **California Registered Corporate Agent's Name** (if agent is a corporation) — Do not complete Item 6a or 6b

7. Type of Business

a. **Describe the type of business or services of the Limited Liability Company**

MEDIA BROADCASTING

8. Chief Executive Officer, if elected or appointed

a. **First Name**

Middle Name

Last Name

Suffix

b. **Address**

City (no abbreviations)

State

Zip Code

9. **The information contained herein, including any attachments, is true and correct.**

5/19/2016

Date

ALEX MERUELO

Type or Print Name of Person Completing the Form

Manager of Meruelo Media, LLC, the Manager

Title

Signature

Return Address (Optional) (For communication from the Secretary of State related to this document, or if purchasing a copy of the filed document enter the name of a person or company and the mailing address. This information will become public when filed. SEE INSTRUCTIONS BEFORE COMPLETING.)

Name: **MARIO TAPANES**

Company: **KPWR RADIO LLC**

Address: **9550 FIRESTONE BLVD, SUITE 105**

City/State/Zip: **DOWNEY, CA 90241**

EXHIBIT “11”

EXHIBIT “11”



Secretary of State
Statement of Information
(Limited Liability Company)

LLC-12

20-B22840

FILED

In the office of the Secretary of State
of the State of California

MAR 12, 2020

This Space For Office Use Only

IMPORTANT — Read instructions **before** completing this form.

Filing Fee — \$20.00

Copy Fees — First page \$1.00; each attachment page \$0.50;
Certification Fee — \$5.00 plus copy fees

1. Limited Liability Company Name (Enter the exact name of the LLC. If you registered in California using an alternate name, see instructions.)

KDAY RADIO, LLC

2. 12-Digit Secretary of State File Number

201407310054

3. State, Foreign Country or Place of Organization (only if formed outside of California)

CALIFORNIA

4. Business Addresses

a. Street Address of Principal Office - Do not list a P.O. Box

9550 FIRESTONE BLVD, SUITE 105

City (no abbreviations)

Downey

State

CA

Zip Code

90241

b. Mailing Address of LLC, if different than item 4a

9550 FIRESTONE BLVD, SUITE 105

City (no abbreviations)

Downey

State

CA

Zip Code

90241

c. Street Address of California Office, if item 4a is not in California - Do not list a P.O. Box

9550 FIRESTONE BLVD, SUITE 105

City (no abbreviations)

Downey

State

CA

Zip Code

90241

5. Manager(s) or Member(s)

If no **managers** have been appointed or elected, provide the name and address of each **member**. At least one name **and** address must be listed. If the manager/member is an individual, complete Items 5a and 5c (leave Item 5b blank). If the manager/member is an entity, complete Items 5b and 5c (leave Item 5a blank). Note: The LLC cannot serve as its own manager or member. If the LLC has additional managers/members, enter the name(s) and addresses on Form LLC-12A (see instructions).

a. First Name, if an individual - Do not complete item 5b

Middle Name

Last Name

Suffix

b. Entity Name - Do not complete item 5a

MERUELO MEDIA, LLC

c. Address

9550 FIRESTONE BLVD, SUITE 105

City (no abbreviations)

Downey

State

CA

Zip Code

90241

6. Service of Process (Must provide either Individual OR Corporation.)

INDIVIDUAL - Complete Items 6a and 6b only. Must include agent's full name and California street address.

a. California Agent's First Name (if agent is not a corporation)

Mario

Middle Name

A

Last Name

Tapanes

Suffix

b. Street Address (if agent is not a corporation) - Do not enter a P.O. Box

9550 FIRESTONE BLVD, SUITE 105

City (no abbreviations)

Downey

State

CA

Zip Code

90241

CORPORATION - Complete item 6c only. Only include the name of the registered agent Corporation.

c. California Registered Corporate Agent's Name (if agent is a corporation) - Do not complete item 6a or 6b

7. Type of Business

a. Describe the type of business or services of the Limited Liability Company

RADIO BROADCASTING

8. Chief Executive Officer, if elected or appointed

a. First Name

Middle Name

Last Name

Suffix

b. Address

City (no abbreviations)

State

Zip Code

9. The information contained herein, including any attachments, is true and correct.

03/12/2020

Alex Meruelo

President of Manager

Date

Type or Print Name of Person Completing the Form

Title

Signature

Return Address (Optional) (For communication from the Secretary of State related to this document, or if purchasing a copy of the filed document enter the name of a person or company and the mailing address. This information will become public when filed. SEE INSTRUCTIONS BEFORE COMPLETING.)

Name:

Company:

Address:

City/State/Zip:

EXHIBIT “12”

EXHIBIT “12”



**California Secretary of State
Electronic Filing**

FILED

Secretary of State
State of California

Corporation - Statement of Information

Entity Name: HERMAN WEISSKER, INC.

Entity (File) Number: C0375489

File Date: 04/03/2020

Entity Type: Corporation

Jurisdiction: CALIFORNIA

Document ID: GE63387

Detailed Filing Information

1. Entity Name: **HERMAN WEISSKER, INC.**
2. Business Addresses:
 - a. Street Address of Principal Office in California:
1645 BROWN AVENUE
Riverside, California 92509
United States of America
 - b. Mailing Address:
9550 Firestone Blvd., Suite 105
Downey, California 90241
United States of America
 - c. Street Address of Principal Executive Office:
1645 BROWN AVENUE
Riverside, California 92509
United States of America
3. Officers:
 - a. Chief Executive Officer:
LUIS A ARMONA
9550 Firestone Blvd., Suite 105
Downey, California 90241
United States of America
 - b. Secretary:
MARIO A TAPANES
9550 Firestone Blvd., Suite 105
Downey, California 90241
United States of America

Document ID: GE63387



California Secretary of State Electronic Filing

Officers (cont'd):

c. Chief Financial Officer:

ALLEN STOLLER
9550 Firestone Blvd., Suite 105
Downey, California 90241
United States of America

4. Director:

ALEX MERUELO
9550 Firestone Blvd., Suite 105
Downey, California 90241
United States of America

Number of Vacancies on the Board of
Directors:

0

5. Agent for Service of Process:

MARIO A TAPANES
9550 FIRESTONE BLVD., SUITE 105
DOWNEY, California 90241
United States of America

6. Type of Business:

UTILITY CONSTRUCTION

By signing this document, I certify that the information is true and correct and that I am authorized by California law to sign.

Electronic Signature: MARIO A TAPANES

Use bizfile.sos.ca.gov for online filings, searches, business records, and resources.

Document ID: GE63387



California Secretary of State Electronic Filing

Corporation - Attachment to Statement of Information

List of Additional Directors:

1. LUIS A ARMONA
9550 Firestone Blvd., Suite 105
Downey, California 90241
United States of America
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.

Document ID: GE63387

EXHIBIT “13”

EXHIBIT “13”



**California Secretary of State
Electronic Filing**



Corporation - Statement of Information No Change

Entity Name: **CANTAMAR PROPERTY MANAGEMENT,
INC.**

Entity (File) Number: C2016247

File Date: 08/26/2020

Entity Type: Corporation

Jurisdiction: CALIFORNIA

Document ID: GH98458

There has been no change in any of the information contained in the previous complete Statement of Information filed with the California Secretary of State.

By signing this document, I certify that the information is true and correct and that I am authorized by California law to sign.

Electronic Signature: **Alex Meruelo**

Use bizfile.sos.ca.gov for online filings, searches, business records, and resources.

Document ID: GH98458



State of California

Kevin Shelley

Secretary of State

STATEMENT OF INFORMATION

(Domestic Stock Corporation)

S

E-091397

FILED

SACRAMENTO, CALIFORNIA

Dec - 16 2004

FEES (Filing and Disclosure): \$25.00. If amendment, see instructions.

IMPORTANT - READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

1. **CORPORATE NAME** (Please do not alter if name is preprinted.)

C2016247

CANTAMAR PROPERTY MANAGEMENT, INC.

9550 FIRESTONE BLVD., SUITE 105
DOWNEY, CA 90241

Kevin Shelley

Kevin Shelley
Secretary of State

This Space For Filing Use Only

CALIFORNIA CORPORATE DISCLOSURE ACT (Corporations Code section 1502.1)

A publicly traded corporation must file with the Secretary of State a Corporate Disclosure Statement (Form SI-PT) annually, within 150 days after the end of its fiscal year. Please see reverse for additional information regarding publicly traded corporations.

COMPLETE ADDRESSES FOR THE FOLLOWING (Do not abbreviate the name of the city. Items 2 and 3 cannot be P.O. Boxes.)

2. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE CITY AND STATE ZIP CODE
9550 FIRESTONE BLVD., SUITE 105 DOWNEY, CA 90241

3. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY CITY STATE ZIP CODE
9550 FIRESTONE BLVD., SUITE 105 DOWNEY, CA 90241

NAMES AND COMPLETE ADDRESSES OF THE FOLLOWING OFFICERS (The corporation must have these three officers. A comparable title for the specific officer may be added; however, the preprinted titles on this form must not be altered.)

4. CHIEF EXECUTIVE OFFICER/ ADDRESS CITY AND STATE ZIP CODE
ALEX MERUELO 9550 FIRESTONE BLVD., SUITE 105 DOWNEY, CA 90241

5. SECRETARY/ ADDRESS CITY AND STATE ZIP CODE
ALEX MERUELO 9550 FIRESTONE BLVD., SUITE 105 DOWNEY, CA 90241

6. CHIEF FINANCIAL OFFICER/ ADDRESS CITY AND STATE ZIP CODE
ALEX MERUELO 9550 FIRESTONE BLVD., SUITE 105 DOWNEY, CA 90241

NAMES AND COMPLETE ADDRESSES OF ALL DIRECTORS, INCLUDING DIRECTORS WHO ARE ALSO OFFICERS (The corporation must have at least one director. Attach additional pages, if necessary.)

7. NAME ADDRESS CITY AND STATE ZIP CODE
ALEX MERUELO 9550 FIRESTONE BLVD., SUITE 105 DOWNEY, CA 90241

8. NAME ADDRESS CITY AND STATE ZIP CODE

9. NAME ADDRESS CITY AND STATE ZIP CODE

10. NUMBER OF VACANCIES ON THE BOARD OF DIRECTIONS, IF ANY: 0

AGENT FOR SERVICE OF PROCESS (If the agent is an individual, the agent must reside in California and Item 12 must be completed with a California address. If the agent is another corporation, the agent must have on file with the California Secretary of State a certificate pursuant to Corporations Code section 1505 and Item 12 must be left blank.)

11. NAME OF AGENT FOR SERVICE OF PROCESS

MARIO A TAPANES

12. ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF AN INDIVIDUAL CITY STATE ZIP CODE
9550 FIRESTONE BLVD., SUITE 105 DOWNEY, CA 90241

TYPE OF BUSINESS

13. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION

PROPERTY MANAGEMENT

14. BY SUBMITTING THIS STATEMENT OF INFORMATION TO THE SECRETARY OF STATE, THE CORPORATION CERTIFIES THE INFORMATION CONTAINED HEREIN, INCLUDING ANY ATTACHMENTS, IS TRUE AND CORRECT.

ALEX MERUELO

PRESIDENT

12/16/2004

TYPE OR PRINT NAME OF PERSON COMPLETING THE FORM

SIGNATURE

TITLE

DATE

EXHIBIT “14”

EXHIBIT “14”



California Secretary of State Electronic Filing

FILED

Secretary of State
State of California

Corporation - Statement of Information

Entity Name: **HERMAN WEISSKER POWER, INC.**

Entity (File) Number: C4084666

File Date: 08/31/2020

Entity Type: Corporation

Jurisdiction: CALIFORNIA

Document ID: GJ12402

Detailed Filing Information

1. Entity Name: HERMAN WEISSKER POWER, INC.
2. Business Addresses:
 - a. Street Address of Principal Office in California: 1700 E. VIA BURTON STREET
ANAHEIM, California 92806
United States of America
 - b. Mailing Address: 9550 FIRESTONE BLVD, SUITE 105
DOWENY, California 90241
United States of America
 - c. Street Address of Principal Executive Office: 1700 E. VIA BURTON STREET
ANAHEIM, California 92806
United States of America
3. Officers:
 - a. Chief Executive Officer: LUIS A ARMONA
9550 FIRESTONE BLVD, SUITE 105
DOWENY, California 90241
United States of America
 - b. Secretary: MARIO A TAPANES
9550 FIRESTONE BLVD, SUITE 105
DOWENY, California 90241
United States of America

Document ID: GJ12402



California Secretary of State Electronic Filing

Officers (cont'd):

c. Chief Financial Officer:

ALLEN S STOLLER
9550 FIRESTONE BLVD, SUITE 105
DOWENY, California 90241
United States of America

4. Director:

ALEX MERUELO
9550 FIRESTONE BLVD, SUITE 105
DOWENY, California 90241
United States of America

Number of Vacancies on the Board of
Directors:

0

5. Agent for Service of Process:

MARIO A TAPANES
9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America

6. Type of Business:

UTILITY CONSTRUCTION

By signing this document, I certify that the information is true and correct and that I am authorized by California law to sign.

Electronic Signature: MARIO A TAPANES

Use bizfile.sos.ca.gov for online filings, searches, business records, and resources.

Document ID: GJ12402



California Secretary of State Electronic Filing

Corporation - Attachment to Statement of Information

List of Additional Directors:

1. LUIS A ARMONA
9550 FIRESTONE BLVD, SUITE 105
DOWENY, California 90241
United States of America
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.

Document ID: GJ12402

EXHIBIT “15”

EXHIBIT “15”



**California Secretary of State
Electronic Filing**



Corporation - Statement of Information

Entity Name: **ONE CALL CONSTRUCTION
SERVICES INC.**

Entity (File) Number: C3808489

File Date: 08/31/2020

Entity Type: Corporation

Jurisdiction: CALIFORNIA

Document ID: GJ12596

Detailed Filing Information

1. Entity Name: ONE CALL CONSTRUCTION
SERVICES INC.
2. Business Addresses:
 - a. Street Address of Principal
Office in California: 9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America
 - b. Mailing Address: 9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America
 - c. Street Address of Principal
Executive Office: 9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America
3. Officers:
 - a. Chief Executive Officer: LUIS A ARMONA
9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America
 - b. Secretary: MARIO A TAPANES
9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America

Document ID: GJ12596



California Secretary of State Electronic Filing

Officers (cont'd):

c. Chief Financial Officer:

ALLEN S STOLLER
9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America

4. Director:

LUIS A ARMONA
9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America

Number of Vacancies on the Board of
Directors:

0

5. Agent for Service of Process:

MARIO A TAPAPNES
9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America

6. Type of Business:

CONSTRUCTION SUPPORT
SERVICES

By signing this document, I certify that the information is true and correct and that I am authorized by California law to sign.

Electronic Signature: MARIO A TAPANES

Use bizfile.sos.ca.gov for online filings, searches, business records, and resources.

Document ID: GJ12596



California Secretary of State Electronic Filing

Corporation - Attachment to Statement of Information

List of Additional Directors:

1. **ALEX MERUELO**
9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.

Document ID: GJ12596

EXHIBIT “16”

EXHIBIT “16”



California Secretary of State
Electronic Filing

FILED

Secretary of State
State of California

Corporation - Statement of Information

Entity Name: **DOTY BROS. EQUIPMENT CO.**

Entity (File) Number: C0369219

File Date: 08/31/2020

Entity Type: Corporation

Jurisdiction: CALIFORNIA

Document ID: GJ12764

Detailed Filing Information

1. Entity Name: DOTY BROS. EQUIPMENT CO.
2. Business Addresses:
 - a. Street Address of Principal Office in California: 11232 E. FIRESTONE BLVD
NORWALK, California 90650
United States of America
 - b. Mailing Address: 9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America
 - c. Street Address of Principal Executive Office: 11232 E. FIRESTONE BLVD
NORWALK, California 90650
United States of America
3. Officers:
 - a. Chief Executive Officer: LUIS A ARMONA
9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America
 - b. Secretary: MARIO A TAPANES
9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America

Document ID: GJ12764



California Secretary of State Electronic Filing

Officers (cont'd):

c. Chief Financial Officer:

ALLEN S STOLLER
9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America

4. Director:

ALEX MERUELO
9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America

Number of Vacancies on the Board of
Directors:

0

5. Agent for Service of Process:

MARIO A TAPANES
9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America

6. Type of Business:

UTILITY CONSTRUCTIONI

By signing this document, I certify that the information is true and correct and that I am authorized by California law to sign.

Electronic Signature: MARIO A TAPANES

Use bizfile.sos.ca.gov for online filings, searches, business records, and resources.

Document ID: GJ12764



California Secretary of State Electronic Filing

Corporation - Attachment to Statement of Information

List of Additional Directors:

1. LUIS A ARMONA
9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.

Document ID: GJ12764

EXHIBIT “17”

EXHIBIT “17”



KS Eleet
Kathleen
Sigurdson
District Court Judge Department 10

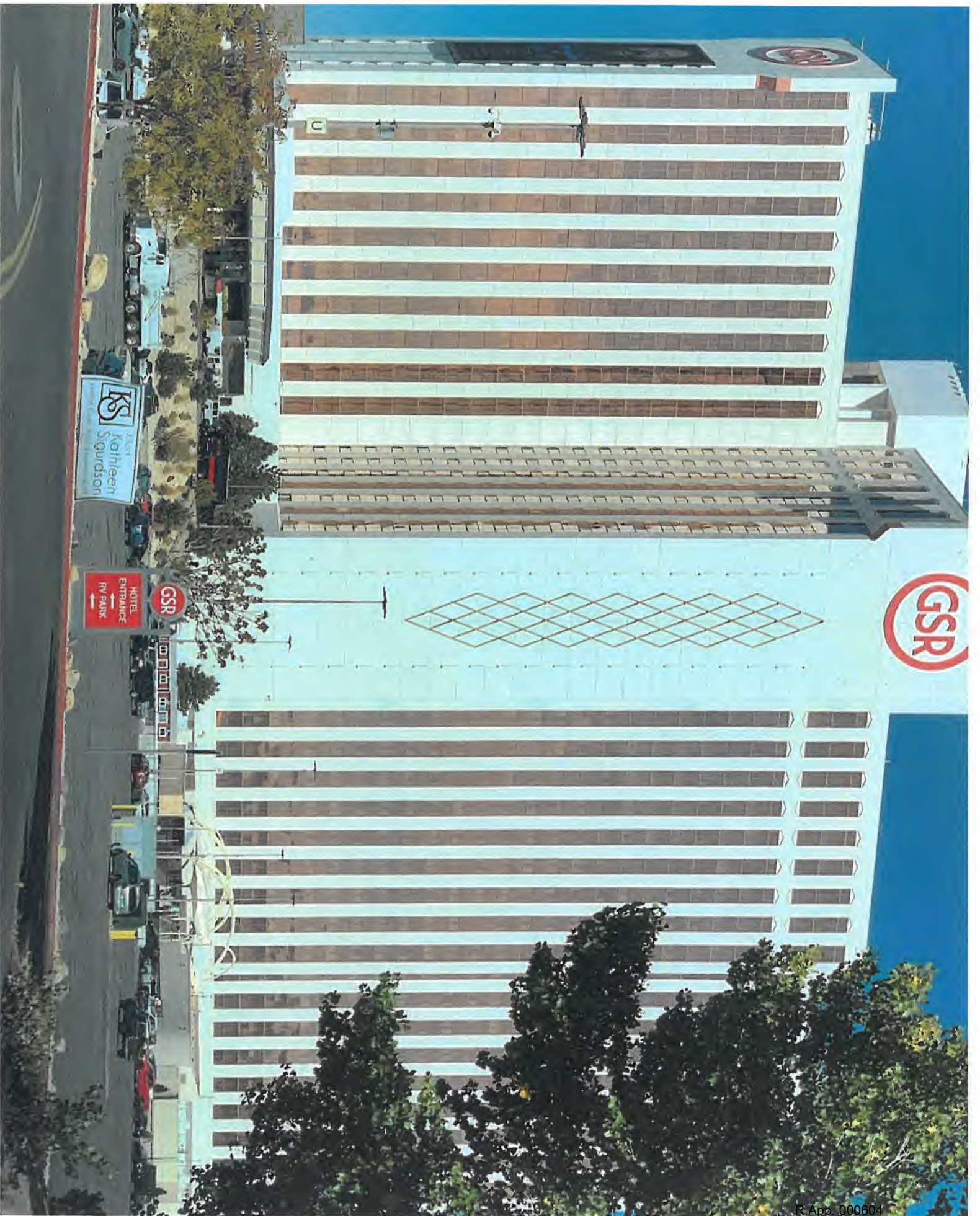








EXHIBIT “18”

EXHIBIT “18”

reno gazette journal

POLITICS

Washoe District Court Election Results: Sigurdson, Dollinger and Robb win races

Kristin Oh Reno Gazette Journal

Published 10:51 p.m. PT Nov. 3, 2020 | Updated 2:17 p.m. PT Nov. 16, 2020

Update: Reno lawyer Kathleen Sigurdson won the judge seat for Washoe District Court Department 10, with 51.40% of the votes. Her competitor, Judge Elliott Sattler, who has been working in the Washoe District Court since 2013, received 48.60% of the votes.

Washoe County released official election results Monday morning.

Sattler had received the highest ranking among general jurisdiction judges in the 2020 Washoe County Bar Association judge survey. According to the survey, Sattler received a ranking of 4.6 and 97.2% of survey participants responded that they believed Sattler should be retained.

Billionaire and owner of the Grand Sierra Resort, Alex Meruelo, made several sizable donations to Sigurdson's campaign.

Meruelo Media Holdings contributed \$10,000 to Sigurdson's campaign on Sept. 14.

She also received \$10,000 donations each from KLOS Radio, KDAY Radio and KPWR Radio. All are owned by Meruelo Media Holdings and based in California. Several of Meruelo's other companies also contributed \$10,000 each to her campaign.

Andrew Diss, vice president of government affairs of GSR, said that it is common for companies from other states to contribute to campaigns, adding that these contributions came from the companies, not Meruelo himself and were all legal donations.

Sigurdson said that she was grateful for all donations she received. Sattler declined to comment.

More: RGJ analysis: California transplants are influencing the vote in Washoe County. Here's how

For the District 11 Family Court judge seat, Family Court Master Paige Dollinger won with 54.51% of the votes. Her competitor, Family Court Master Greg Shannon, received 45.49% of the votes.

Incumbent Judge Bridget Robb won the District Court Department 13 race with 63.31% of the votes. Her competitor and former law clerk, Aaron Bushur, received 36.39% of the votes.

Original: Among the closely watched Washoe County elections, Reno lawyer Kathleen Sigurdson is competing against Judge Elliot Sattler, who has been working in the Washoe District Court since 2013. They are competing for the District Court Department 10 judge seat.

Unofficial results as of Thursday morning show that Sigurdson has a slim lead of 51% of the votes. Sattler has 49% of the votes.

Keep an eye on the Reno Gazette Journal's results page for a first look at local races.

More: Voter guide: Sattler and Sigurdson vie for judge seats in District Court Department 10

District Court Department 11

Fighting for the District Court Department 11 Family Court Judge seat are Court Masters Paige Dollinger and Greg Shannon.

Unofficial results as of Thursday morning show that Dollinger is ahead with 55% of the votes. Shannon has 45% of the votes.

The seat was previously held by Reno Judge Chuck Weller, who decided not to see re-election this year. Early in his career, he was shot by pawn shop millionaire Darren Mack, whose divorce he was presiding over. Weller had a tumultuous final term and was fined \$2,500 by the Nevada Commission on Judicial Discipline for making “disturbing” and “offensive” comments about women.

During the primaries, Dollinger received 45% of the votes and Shannon received 31%.

More: Election 2020: Dollinger, Shannon vie for Chuck Weller's seat in Washoe Family Court

District Court Department 13

Competing for the judge seat in District Court Department 13, Family Court are incumbent Brigit Robb and her former law clerk, Aaron Bushur.

Robb has worked with the Second District Court since 2008. Bushur served as Robb's law clerk from 2008 to 2010. He is currently a lawyer that specializes in family law.

Unofficial results show that Robb has 64% of the votes, according to registrar numbers released Thursday morning. Bushurr has 36% of the votes.

More: Judge Bridget Robb's former clerk Aaron Bushur running against her for family court seat

IN THE SUPREME COURT OF THE STATE OF NEVADA

MEI-GSR HOLDINGS, LLC, a Nevada Limited Liability Company, GRAND SIERRA RESORT UNIT OWNERS' ASSOCIATION, a Nevada nonprofit corporation, GAGE VILLAGE COMMERCIAL DEVELOPMENT, LLC, a Nevada Limited Liability Company; AM-GSR HOLDINGS, LLC, a Nevada Limited Liability Company,

Appellants,

vs.

ALBERT THOMAS, individually; JANE DUNLAP, individually; JOHN DUNLAP, individually; BARRY HAY, individually; MARIE-ANNE ALEXANDER, as Trustee of the MARIE-ANNE ALEXANDER LIVING TRUST; MELISSA VAGUJHELYI and GEORGE VAGUJHELYI, as Trustees of the GEORGE VAGUJHELYI AND MELISSA VAGUJHELYI 2001 FAMILY TRUST AGREEMENT, U/T/A APRIL 13, 2001; D' ARCY NUNN, individually; HENRY NUNN, individually; MADELYN VAN DER BOKKE, individually; LEE VAN DER BOKKE, individually; ROBERT R. PEDERSON, individually and as Trustee of the PEDERSON 1990 TRUST; LOU ANN PEDERSON, individually and as Trustee of the PEDERSON 1990 TRUST; LORI ORDOVER, individually; WILLIAM A. HENDERSON, individually; CHRISTINE E. HENDERSON, individually; LOREN D. PARKER, individually; SUZANNE C. PARKER, individually; MICHAEL IZADY, individually; STEVEN TAKAKI, as Trustee of the STEVEN W. TAKAKI & FRANCES S. LEE REVOCABLE TRUSTEE AGREEMENT, UTD

Supreme Court No. 86092

District Court Case No. CV12-02222

JANUARY 11, 2000; FARAD TORABKHAN, individually; SAHAR TAVAKOLI, individually; M&Y HOLDINGS, LLC; JL&YL HOLDINGS, LLC; SANDI RAINES, individually; R. RAGHURAM, as Trustee of the RAJ AND USHA RAGHURAM LIVING TRUST DATED APRIL 25, 2001; USHA RAGHURAM, as Trustee of the RAJ AND USHA RAGHURAM LIVING TRUST DATED APRIL 25, 2001; LORI K. TOKUTOMI, individually; GARRET TOM, as Trustee of THE GARRET AND ANITA TOM TRUST, DATED 5/14/2006; ANITA TOM, as Trustee of THE GARRET AND ANITA TOM TRUST, DATED 5/14/2006; RAMON FADRILAN, individually; FAYE FADRILAN, individually; PETER K. LEE and MONICA L. LEE, as Trustees of the LEE FAMILY 2002 REVOCABLE TRUST; DOMINIC YIN, individually; ELIAS SHAMIEH, individually; JEFFREY QUINN, individually; BARBARA ROSE QUINN individually; KENNETH RICHE, individually; MAXINE RICHE, individually; NORMAN CHANDLER, individually; BENTON WAN, individually; TIMOTHY D. KAPLAN, individually; SILKSCAPE INC.; PETER CHENG, individually; ELISA CHENG, individually; GREG A. CAMERON, individually; TMI PROPERTY GROUP, LLC; RICHARD LUTZ, individually; SANDRA LUTZ, individually; MARY A. KOSSICK, individually; MELVIN CHEAH, individually; DI SHEN, individually; NADINE'S REAL ESTATE INVESTMENTS, LLC; AJIT GUPTA, individually; SEEMA GUPTA, individually; FREDERICK FISH, individually; LISA FISH, individually; ROBERT A. WILLIAMS, individually; JACQUELIN PHAM, as Manager of Condotel 1906 LLC; MAY ANNE HOM, as Trustee of the MAY ANNE HOM TRUST;

MICHAEL HURLEY, individually; DUANE WINDHORST, as Trustee of DUANE H. WINDHORST TRUST U/A dtd. 01/15/2003 and MARILYN L. WINDHORST TRUST U/A/ dtd. 01/15/2003; MARILYN WINDHORST, as Trustee of DUANE H. WINDHORST TRUST U/A dtd. 01/15/2003 and MARILYN L. WINDHORST TRUST U/A/ dtd. 01/15/2003; VINOD BHAN, individually; ANNE BHAN, individually; GUY P. BROWNE, individually; GARTH A. WILLIAMS, individually; PAMELA Y. ARATANI, individually; DARLEEN LINDGREN, individually; LAVERNE ROBERTS, individually; DOUG MECHAM, individually; CHRISTINE MECHAM, individually; KWANG SOON SON, individually; SOO YEU MOON, individually; JOHNSON AKINBODUNSE, individually; IRENE WEISS, as Trustee of the WEISS FAMILY TRUST; PRAVESH CHOPRA, individually; TERRY POPE, individually; NANCY POPE, individually; JAMES TAYLOR, individually; RYAN TAYLOR, individually; KI NAM CHOI, individually; YOUNG JA CHOI, individually; SANG DAE SOHN, individually; KUK HYUN (CONNIE) YOO, individually; SANG SOON (MIKE) YOO, individually; BRETT MENMUIR, as Manager of CARRERA PROPERTIES, LLC; WILLIAM MINER, JR., individually; CHANH TRUONG, individually; ELIZABETH ANDRES MECUA, individually; SHEPHERD MOUNTAIN, LLC; ROBERT BRUNNER, individually; AMY BRUNNER, individually; JEFF RIOPELLE, as Trustee of the RIOPELLE FAMILY TRUST; PATRICIA M. MOLL, individually; DANIEL MOLL, individually,

Respondents.

**APPENDIX TO RESPONDENTS' REPLY TO APPELLANTS' RESPONSE
TO MAY 8, 2023 ORDER TO SHOW CAUSE**

VOLUME 3 OF 4

Submitted for all respondents by:

ROBERT L. EISENBERG (SBN 0950)
LEMONS, GRUNDY & EISENBERG
6005 Plumas Street, Third Floor
Reno, NV 89519
775-786-6868

JARRAD C. MILLER (SBN 7093)
BRIANA N. COLLINGS (SBN 14694)
ROBERTSON, JOHNSON, MILLER & WILLIAMSON
50 West Liberty Street, Suite 600
Reno, NV 89501
775-329-5600

ATTORNEYS FOR RESPONDENTS ALBERT THOMAS, et al.

INDEX TO RESPONDENTS' APPENDIX

<u>NO.</u>	<u>DOCUMENT</u>	<u>DATE</u>	<u>VOL.</u>	<u>PAGE NO.</u>
1.	Order Appointing Receiver and Directing Defendants' Compliance Ex. 1: Seventh Amendment to Condominium Declaration of Covenants, Codes, Restrictions and Reservations of Easements for Hotel-Condominiums at Grand Sierra Resort Ex. 2: Unit Maintenance Agreement Ex. 3: Unit Rental Agreements	01/07/2015	1	1 – 158
2.	Complaint	08/27/2012	1	159 – 180
3.	Second Amended Complaint	03/26/2013	1	181 – 206
4.	Findings of Fact, Conclusions of Law and Judgment	10/09/2015	1	207 – 230
5.	Order Granting Plaintiffs' Motion for Case-Terminating Sanctions	10/03/2014	1	231 – 243
6.	Notice of Posting Supersedeas Bond	03/13/2023	2	244 – 256
7.	Order [on application for temporary restraining order, and motion for preliminary injunction]	12/05/2022	2	257 – 265
8.	Order Approving Parties Stipulation	02/07/2023	2	266 – 286
9.	Order [granting motion to certify Amended Final Judgment as final pursuant to NRCP 54(b)]	06/28/2023	2	287 – 290
10.	Defendants' Motion to Dismiss for Lack of Subject Matter Jurisdiction	12/01/2015	2	291 – 459
11.	Order [granting motion to dismiss]	05/09/2016	2	460 – 473

12.	Order Granting Motion to Substitute	01/25/2019	2	474 – 475
13.	Motion to Substitute Receiver	12/27/2018	3	476 – 516
14.	Order Granting Motion for Instructions to Receiver	02/15/2019	3	517 – 519
15.	Receiver’s Report re GSRUOA, for the Period from September 1 through September 30, 2019	10/07/2019	3	520 – 527
16.	Affidavit of Bias or Prejudice Concerning Kathleen Sigurdson, Esq. Pursuant to NRS 1.235	12/28/2020	3	528 – 611
17.	Order of Recusal of Presiding Judge and for Random Reassignment	01/07/2021	3	612 – 685
18.	Order Disqualifying All Judicial Officers of the Second Judicial District Court	01/21/2021	3	686 – 688
19.	Plaintiffs’ Peremptory Challenge of Judge	01/22/2021	3	689 – 690
20.	Memorandum of Temporary Assignment	02/24/2021	3	691 – 692
21.	Plaintiffs’ Matrix and Motion for Clarification	08/08/2022	3	693 – 713
22.	Order [reassigning matter to Senior Judge Gonzalez]	09/29/2022	3	714 – 715
23.	Order Granting Motion to Strike Defendants’ Peremptory Challenge of Judge	11/02/2022	3	716 – 723
24.	Order [awarding punitive damages]	01/17/2023	4	724 – 729

25.	Final Judgment	02/06/2023	4	730 – 733 (734-735 intentionally blank)
26.	Amended Final Judgment	04/10/2023	4	736 – 739
27.	Second Amended Final Monetary Judgment	06/29/2023	4	740 – 744
28.	Application for Temporary Restraining Order, and Motion for Preliminary Injunction	03/01/2022	4	745 – 792
29.	Order [denying Defendants’ motion to modify and terminate receivership]	03/27/2023	4	793 – 795
30.	Order [continuing hearing]	03/28/2023	4	796 – 797
31.	Rough Draft of Transcript	06/09/2023	4	798 – 808
32.	Order [on motion for order to show cause]	05/23/2023	4	809 – 811
33.	Order [overruling Defendants’ objection to Receiver’s calculations contained in exhibit 1 attached to Receiver’s omnibus reply to parties’ oppositions to the Receiver’s motion for orders & instructions]	03/27/2023	4	812 – 814

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Robertson, Johnson, Miller & Williamson, over the age of eighteen, and not a party to the within action. I further certify that on July 10, 2023, I electronically filed the foregoing with the Clerk of the Court by using the ECF system which served the following parties electronically:

Jordan T. Smith, Esq.
Pisanelli Bice PLLC
400 South 7th Street, Suite 300
Las Vegas, NV 89101
*Attorneys for Appellants
MEI-GSR Holdings, LLC;
Gage Village Commercial
Development, LLC; and
AM-GSR Holdings, LLC*

F. DeArmond Sharp, Esq.
Stefanie T. Sharp, Esq.
Robison, Sharp Sullivan & Brust
71 Washington Street
Reno, NV 89503
*Attorneys for Receiver
Richard M. Teichner*

Abran Vigil, Esq.
Meruelo Group, LLC
Legal Services Department
5th Floor Executive Offices
2535 Las Vegas Boulevard South
Las Vegas, NV 89109
*Attorneys for Appellants
MEI-GSR Holdings, LLC;
Gage Village Commercial
Development, LLC; and
AM-GSR Holdings, LLC*

Ann O. Hall, Esq.
David C. McElhinney, Esq.
Meruelo Group, LLC
2500 E. 2nd Street
Reno, NV 89595
*Attorney for Appellants
MEI-GSR Holdings, LLC;
Gage Village Commercial
Development, LLC; and
AM-GSR Holdings, LLC*

/s/ Stefanie Martinez

An Employee of Robertson, Johnson,
Miller & Williamson

1 CODE NO.: 3370
2
3
4
5

6 IN THE SECOND JUDICIAL DISTRICT COURT FOR THE STATE OF NEVADA
7 IN AND FOR THE COUNTY OF WASHOE
8

9 ALBERT THOMAS, ET AL.,

Case No.: CV12-02222

10 PLAINTIFFS,

Dept. No.: 10

11 vs.

12 MEI-GSR HOLDINGS, LLC, ET AL.,

13 DEFENDANTS.
14

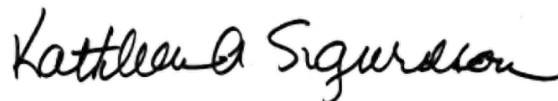
15 **ORDER OF RECUSAL OF PRESIDING JUDGE**

16 **AND FOR RANDOM REASSIGNMENT**

17 In accordance with the applicable Nevada Code of Judicial Conduct, and to avoid
18 any actual or perceived conflict or appearance of impropriety, the undersigned hereby
19 disqualifies herself as the presiding judge in this action.

20 The Clerk shall randomly reassign this action to another department of this Court
21 for all other proceedings.

22 DATED this 7th day of January, 2021.
23

24 

25 DISTRICT COURT JUDGE
26
27
28

EXHIBIT “1”

EXHIBIT “1”

WASHOE COUNTY BAR ASSOCIATION JUDICIAL SURVEY 2020

	Performance Score Average	Should this judge be retained?	
		Yes	No
Supreme Court			
Justice Elissa Cadish	-	85.2%	14.8%
Justice Mark Gibbons	-	-	-
Justice James Hardesty	-	88.5%	11.5%
Justice Ron Parraguirre	-	86.7%	13.3%
Justice Kristine Pickering	-	90.2%	9.8%
Justice Abbi Silver	-	70.0%	30.0%
Justice Lidia Stiglich	-	92.8%	7.2%

Nevada Court of Appeals

Judge Bonnie Bulla	-	68.2%	31.8%
Judge Michael Gibbons	-	84.8%	15.2%
Judge Jerome Tao	-	47.6%	52.4%

General Jurisdiction

Judge Kathleen Drakulich (Dept. 1)	4.5	95.5%	4.5%
Judge Jerry Polaha (Dept. 3)	4.1	86.9%	13.1%
Judge Connie Steinheimer (Dept. 4)	3.9	75.5%	24.5%
Judge Lynne Simons (Dept. 6)	3.9	80.6%	19.4%
Judge Egan Walker (Dept. 7)	4.1	82.5%	17.5%
Judge Barry Breslow (Dept. 8)	3.8	70.9%	29.1%
Judge Scott Freeman (Dept. 9)	4.2	92.2%	7.8%
Judge Elliott Sattler (Dept. 10)	4.6	97.2%	2.8%
Judge David Hardy (Dept. 15)	4.2	87.9%	12.1%

Family Division

Judge Dixie Grossman (Dept. 2)	4.7	97.8%	2.2%
Judge Cynthia Lu (Dept. 5)	4.1	88.1%	11.9%
Judge Chuck Weller (Dept. 11)	2.8	-	-
Judge Sandra Unsworth (Dept. 12)	4.4	94.4%	5.6%
Judge Bridget Robb (Dept. 13)	3.9	78.6%	21.4%
Judge Tamatha Schreinert (Dept. 14)	4.5	100.0%	0.0%

WASHOE COUNTY BAR ASSOCIATION JUDICIAL SURVEY 2020

		Should this judge be retained?	
	Performance Score Average	Yes	No
Court Commissioners			
Discovery Commissioner Wesley Ayres	4.7	-	-
Probate Commissioner Edmund Gorman, Jr.	4.5	-	-

Court Masters - Family Division

Amy Banales	4.4	-	-
Paige Dollinger	4.5	-	-
Alison Testa	4.0	-	-
Greg Shannon	3.2	-	-

Justice of the Peace – Washoe County

Judge E. Alan Tiras (Incline Village)	4.2	69.2%	30.8%
Judge Derek Dreilling, (Reno Dept. 1)	4.3	100.0%	0.0%
Judge Pete Sferrazza, (Reno Dept. 2)	2.8	32.4%	67.6%
Judge Ryan Sullivan, (Reno Dept. 3)	4.1	76.2%	23.8%
Judge Scott Pearson, (Reno, Dept. 4)	4.4	97.3%	2.7%
Judge David Clifton, (Reno, Dept. 5)	4.2	86.8%	13.2%
Judge Pierre Hascheff, (Reno, Dept. 6)	4.2	87.8%	12.2%
Judge Chris Wilson, (Sparks, Dept. 1)	3.8	74.1%	25.9%
Judge Kevin Higgins, (Sparks, Dept. 2)	4.2	94.1%	5.9%
Judge Jessica Longley, (Sparks, Dept. 3)	4.3	89.5%	10.5%
Judge Terry Graham, (Wadsworth)	4.0	87.5%	12.5%

Municipal Courts – Washoe County

Judge Gene Drakulich (Reno, Dept. 1)	4.2	88.9%	11.1%
Judge Shelly O'Neill (Reno, Dept. 2)	4.2	81.0%	19.0%
Judge Dorothy Nash Holmes (Reno, Dept. 3)	4.2	76.9%	23.1%
Judge Tammy Riggs (Reno, Dept. 4)	4.4	84.6%	15.4%
Judge Barbara McCarthy (Sparks, Dept. 1)	4.5	100.0%	0.0%
Judge James Spoo (Sparks, Dept. 2)	3.9	80.0%	20.0%

EXHIBIT “2”

EXHIBIT “2”

IS JUSTICE FOR SALE IN WASHOE COUNTY?



ORRIN J. H. JOHNSON

OCTOBER 25TH, 2020 - 2:00AM

This last week, one of my clients finally got his day in court. He had pled not guilty in January and invoked his right to a speedy trial, which was set for March. Less than two weeks before his case was set to be judged by a jury of his peers, the courthouse closed.

He was not alone – dozens of Washoe County Jail inmates have tried to demand this fundamental right, but have languished in jail while our overreaction to COVID-19 has undermined the most basic foundations of the institutions necessary to maintain a free society.

My case last week was the third jury trial since they resumed last month. The preparation had been intense and impressive, not just from the extraordinary presiding judge, Judge Kathleen Drakulich, but from the entirety of the Second Judicial District Court bench, court staff, and the Washoe County Sheriff's Office (WCSO deputies staff the court as bailiffs). As a result, my client was able to get his day in court, and the wheels of justice rolled forward, as they always must if we are to retain our freedoms and liberties.

Among the judges most involved with all of the planning for resuming was Elliott Sattler, who is the only general jurisdiction District Court judge to face a challenger in Washoe County this cycle. This was somewhat of a surprise, given the fact that Judge Sattler is the highest rated general jurisdiction District Court judge in the courthouse, according to the Washoe County Bar Association's bi-annual survey of lawyers who appear in front of those judges. His work ethic, preparation, and legal knowledge are legendary, but he also takes the time (and always has, even when he was practicing law as a prosecutor) to mentor and train younger lawyers.

I was recently at the home of one of my colleagues, another former public defender who let's just say probably will not be voting for many of the same people I will be. But both of us have an Elliott Sattler sign in our yards, because we know the people of Washoe County – including everyone involved in the criminal justice system – live in a more just society because Sattler sits on the bench.

Nevertheless, being a good judge means sometimes you piss people off, because true “equal justice under the law” doesn’t take into consideration wealth and power. The problem is that when we elect judges, we give wealth and power too much weight on Lady Justice’s scales.

About a year ago, I got a call from someone who was asking (somewhat mysteriously) about my interest in running to be a judge, with an implication that if I was interested, the campaign would be fully funded. It also was clear from that conversation that the mysterious would-be-benefactor was interested in targeting a sitting judge, although it wasn’t until a month or so later that it was made clear to me who that judge was – Judge Sattler. Not desiring to run against both a great judge (and a personal friend and mentor to me, in full candor), I demurred. I later learned that at least half a dozen of my other colleagues had also been contacted to run against Judge Sattler, with all of them refusing until the mystery money man finally got his candidate at the eleventh hour.

Now, I don’t particularly like that we elect judges in head-to-head political campaigns (and no, there is no such thing as a non-political effort to garner votes for someone, even in a non-partisan race). But since that’s our system, I don’t have a problem with a citizen or group of citizens getting together and challenging an incumbent. Such challenges were designed to be a check on bad judges, who from time to time are able to get themselves elected in the first place.

But it requires tremendous diligence on the part of the voting public to ensure that what should be a check on bad judges doesn’t turn into the ability for rich people to buy judicial seats to ensure their court battles go their way (or to punish more independently-minded jurists). The canons of judicial ethics include special rules which severely limit what can be said during a judicial race (which I think is a mistake – if we’re going to have an election, go whole hog with it and let the people decide).

These restrictions, along with a judge's day-to-day duties and performance being invisible to most members of the general public, can turn such races into pure name-recognition/popularity contests, which obviously makes the ability to buy billboards or internet ads a too-important factor.

Judge Sattler's challenger, Kathleen Sigurdson, no doubt received a similar call to the one I got last year. Her funding comes almost entirely from a single source, a California billionaire who bought a casino and thought that entitled him to buy justice, too. I don't know her, but no doubt plenty of her colleagues do – and to date, only four (four!) other lawyers have been willing to come out and endorse her, compared to the endless list from across political and legal spectrums supporting Judge Sattler. Not only did I endorse Judge Sattler months ago, but I contributed \$700 to his campaign.

And when you compare their responses to general questions about their judicial approaches, the contrast between the two gets even more stark. (Sigurdson answers basic questions about why she's running or questions of criminal justice as if she's never actually considered them before, which is flat out bizarre.)

What is most troubling is that Sigurdson's patron is so dishonest about the patronage. Grand Sierra Resort owner Alex Meruelo, through spokesman Andrew Diss, claimed they didn't meet or decide to fund Sigurdson until after she filed, which the calls I and my colleagues received demonstrate to be a flat-out lie. I had been asked to keep that conversation private, which I was happy to do until that silence risked being part of deceiving the public about who was trying to buy "justice," and why.

And as to Sigurdson herself? Well, I have no intention of voting for a judge so obviously for sale, and neither should any of you.

Without the competent, hard-working, and independently-minded judges in the Second Judicial District Court, my client last week either wouldn't have had his day in court at all, or couldn't have counted upon justice being served when that day arrived. Most of our fine sitting judges were either originally appointed, or made their initial run without opposition because they had already received such a broad base of support from colleagues who respected them that any challenge would have been futile.

It is fortunate that in this case, at least, this effort to simply buy a judgeship (and worse, to punish a phenomenal sitting judge for daring to scrupulously apply the law equally to all) is soooooo amateurishly transparent. Not all such efforts are or will be in the future, which is why we should either appoint all of our judges, and/or conduct retention elections only for judges as a public check on the system.

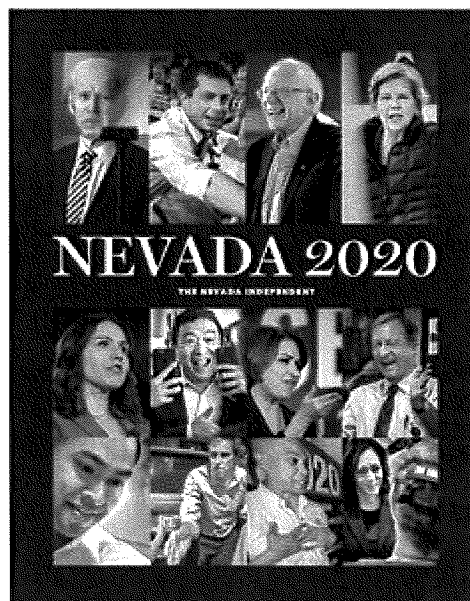
In the meantime, however, we must be vigilant in these types of races, looking beyond mere name-recognition to ensure our system of justice for all remains in competent, independent hands.

Orrin Johnson has been writing and commenting on Nevada and national politics since 2007. He started with an independent blog, [First Principles](#), and was a regular columnist for the [Reno Gazette-Journal](#) from 2015-2016. By day, he is a [criminal defense attorney in Reno](#). Follow him on Twitter [@orrinjohnson](#), or contact him at orrin@orrinjohnson.com.

GET OUR MORNING NEWSLETTER,
THE DAILY INDY

Sign Up

Check out our IndySwag store



Nevada 2020 Photo Book - \$19.99

EXHIBIT “3”

EXHIBIT “3”

Print Help? **PRINT****CONTRIBUTIONS AND EXPENSES REPORT****State of Nevada****Kathleen Sigurdson****District Court Judge, District 2, Department 10**

Name

Office (if applicable)

District (if applicable)

3055 Lyon Lane, Washoe Valley, NV, 89704**775-337-0300**

Mailing Address

Telephone No.

k_sigurdson@msn.com

E-Mail Address

Select Appropriate Box(es)



CANDIDATE

LEGAL DEFENSE FUND What is this?

AMENDED

**Report #1 - Due April 15, 2020**

Period: Jan 01, 2020 - Mar 31, 2020

**Report #2 - Due July 15, 2020**

Period: Apr 01, 2020 - Jun 30, 2020

**Report #3 - Due October 15, 2020**

Period: Jul 01, 2020 - Sep 30, 2020

**Report #4 - Due January 15, 2021**

Period: Oct 01, 2020 - Dec 31, 2020

**Annual Filing - Due January 15, 2021**

Period: Jan 01, 2020 - Dec 31, 2020

FILED

Apr 15 2020

**BARBARA K.
CEGAVSKE
SECRETARY OF STATE**

FOR OFFICE USE ONLY

* Report #4 suffices for the 2021 Annual CE Filing only if Report #'s 1, 2, 3, are previously filed this period.

CONTRIBUTIONS SUMMARY

1. Total Monetary Contributions Received in Excess of \$100
2. Total Monetary Contributions in the Form of Loans Guaranteed by a 3rd-Party in Excess of \$100
3. Total Monetary Contributions in the Form of Loans that were Forgiven in Excess of \$100
4. Total Amount of Written Commitments for Contributions in Excess of \$100
5. Total Value of In Kind Contributions in Excess of \$100
6. Total Value of Written Commitments for In Kind Contributions in Excess of \$100
7. Total Amount of all Contributions of \$100 or less
8. Total Amount of All Contributions (Add Lines 1 through 7)

This Period	Cumulative From Beginning of Report Period #1 Through End of This Reporting Period
\$ 23,000.00	\$ 23,000.00
\$ 0.00	\$0.00
\$ 0.00	\$0.00
\$ 0.00	\$0.00
\$ 0.00	\$0.00
\$ 0.00	\$0.00
\$ 0.00	\$0.00
\$ 23,000.00	\$23,000.00

EXPENSES SUMMARY

9. Total Monetary Expenses Paid in Excess of \$100
10. Total Value In Kind Expenses in Excess of \$100
11. Total Amount of all Expenses of \$100 or less
12. Total Amount of All Expenses (Add Lines 9 through 11)

\$ 8,627.36	\$8,627.36
\$ 0.00	\$0.00
\$ 0.00	\$0.00
\$ 8,627.36	\$8,627.36

ENDING FUND BALANCE

13. Fund balance at the end of the reporting period

\$14372.64**AFFIRMATION**

I Declare Under Penalty of Perjury That the Foregoing is True and Correct.

AND



I have agreed to the following terms and conditions:

I declare, under penalty of perjury or under an oath to God, that the information I submitted herein to the Secretary of State for the State of Nevada is true and correct, and is not submitted for any improper purpose, and that I am authorized to submit the information, and to the best of my knowledge complies with NRS Chapter 294A. I have reviewed the NRS 225.083 Notice. I understand it is unlawful to submit any illegal, unauthorized, fraudulent, forged, deceptive, defamatory, illicit, or improper information, as defined by state and federal law, to the Secretary of State, and agree to indemnify the Secretary of State, and any other parties entitled thereto, for any damages incurred for any unlawful, unauthorized, fraudulent, forged, deceptive, defamatory, illicit, or improper information, as defined by the federal and state law, submitted to the Secretary of State by my use of this electronic filing system. I further understand that I may be subject to criminal (NRS 239.330) and/or civil (NRS 225.084) penalties for submitting any unlawful unauthorized, fraudulent, forged, deceptive, defamatory, illicit, or improper information, as defined by federal and state law. I understand and agree that all information submitted is the property of the Secretary of State, and may be monitored for all lawful purposes. I further understand that during such monitoring, all information, including personal information placed on this system, may be examined, copied, and used for any authorized purpose. By submitting this report I intend to identify myself as the authorized person signing this document and with the present intent to authenticate my signature as such.

Kathleen Sigurdson**04/15/2020**

Signature

Date

R.App. 000622

**MONETARY
CONTRIBUTIONS**Report Period **# 1****Kathleen Sigurdson****District Court Judge, District 2, Department 10**


Name (print)

Office (if applicable)

District (if applicable)

**MONETARY CONTRIBUTIONS IN EXCESS OF \$100 OR,
WHEN ADDED TOGETHER FROM ONE CONTRIBUTOR, THAT EXCEED \$100**

(Transfer Total Amount of All Monetary Contributions to Lines 1, 2, or 3, As Applicable, of Contributions Summary)

<u>NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO MADE CONTRIBUTION</u>	<u>DATE OF CONTRIBUTION</u> 	<u>AMOUNT OF CONTRIBUTION</u>	<u>CHECK HERE IF LOAN</u>	<u>NAME AND ADDRESS OF 3rd PARTY IF LOAN GUARANTEED BY 3rd PARTY</u>	<u>NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO FORGAVE THE LOAN, IF DIFFERENT THAN CONTRIBUTOR</u>
Grand Sierra 2500 E. Second St. Reno, NV 89595	01/31/2020	\$10,000.00			
Sahara 2535 Las Vegas Blvd S Las Vegas, NV 89109	02/21/2020	\$10,000.00			
Andrew Dannnin 888 Timber Walk Drive Henderson, NV 89052	03/13/2020	\$2,500.00			
Jason Mills 2200 S Rancho Dr Ste 140 Las Vegas, NV 89102	03/13/2020	\$500.00			

WRITTEN COMMITMENTSReport Period **# 1****Kathleen Sigurdson****District Court Judge, District 2, Department 10**


Name (print)

Office (if applicable)

District (if applicable)

**WRITTEN COMMITMENTS FOR CONTRIBUTIONS IN EXCESS OF \$100 OR,
WHEN ADDED TOGETHER FROM ONE ENTITY, THAT EXCEED \$100**

(Transfer Total Amount of All Written Commitments to Line 4 of Contributions Summary)

<u>NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO MADE THE COMMITMENT</u>	<u>DATE OF COMMITMENT</u> 	<u>AMOUNT OF COMMITMENT</u>

R.App. 000623

IN KIND CONTRIBUTIONSReport Period **# 1****Kathleen Sigurdson****District Court Judge, District 2, Department 10**

Name (print)

Office (if applicable)

District (if applicable)

**IN KIND CONTRIBUTIONS IN EXCESS OF \$100 OR,
WHEN ADDED TOGETHER FROM ONE CONTRIBUTOR, THAT EXCEED \$100**

(Transfer Total Value of All In Kind Contributions to Line 5 of Contributions Summary)

<u>NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO MADE IN KIND CONTRIBUTION</u>	<u>DATE OF IN KIND CONTRIBUTION</u>	<u>DESCRIPTION OF IN KIND CONTRIBUTION</u>	<u>VALUE OR COST OF IN KIND CONTRIBUTION</u>	<u>CHECK HERE IF LOAN</u>	<u>NAME AND ADDRESS OF 3rd PARTY IF LOAN GUARANTEED BY 3rd PARTY</u>	<u>NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO FORGAVE THE LOAN, IF DIFFERENT THAN CONTRIBUTOR</u>

R.App. 000624

**WRITTEN COMMITMENTS FOR IN KIND
CONTRIBUTIONS**
Report Period # 1

Kathleen Sigurdson
District Court Judge, District 2, Department 10

Name (print)

Office (if applicable)

District (if applicable)

**WRITTEN COMMITMENTS FOR IN KIND CONTRIBUTIONS IN EXCESS OF \$100 OR,
WHEN ADDED TOGETHER FROM ONE ENTITY, THAT EXCEED \$100**

(Transfer Total Value of All In Kind Written Commitments to Line 6 of Contributions Summary)

NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO MADE THE IN KIND WRITTEN COMMITMENT	DATE OF IN KIND WRITTEN COMMITMENT	VALUE OF IN KIND WRITTEN COMMITMENT

R.App. 000625

EXPENSE CATEGORIESReport Period **# 1****Kathleen Sigurdson****District Court Judge, District 2, Department 10**

Name (print)

Office (if applicable)

District (if applicable)

EXPENSE CATEGORIES (NRS 294A.365)

CATEGORIES	CODE
Office expenses	A
Expenses related to volunteers	B
Expenses related to travel	C
Expenses related to advertising	D

R.App. 000626

Expenses related to paid staff	E
Expenses related to consultants	F
Expenses related to polling	G
Expenses related to special events	H
Expenses related to legal defense fund	I
Goods and services provided in kind for which money would otherwise have been paid	J
Contributions made to: (i) another candidate; (ii) a nonprofit corporation that is registered or required to be registered pursuant to NRS 294A.225; (iii) a PAC that is registered or required to be registered pursuant to NRS 294A.230; or (iv) a Recall Committee that is registered or required to be registered pursuant to NRS 294A.250	K
Fees for filing declarations of candidacy or acceptances of candidacy	L
Repayments or forgiveness of loans	M
Disposal of unspent contributions pursuant to NRS 294A.160	N
Other miscellaneous expenses	O

¹ NRS 294A.362 requires "In Kind" contributions and expenses to be reported on a separate form, which is attached hereto.

MONETARY EXPENSESReport Period **# 1****Kathleen Sigurdson****District Court Judge, District 2, Department 10**

Name (print)

Office (if applicable)

District (if applicable)

MONETARY EXPENSES IN EXCESS OF \$100

(Transfer Total Amount of All Campaign Expenses to Line 9 of Expenses Summary)

<u>NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO RECEIVED THE PAYMENT FOR THE EXPENSE</u>	<u>CATEGORY</u> (NRS 294A.365)	<u>DATE OF EXPENSE</u>	<u>AMOUNT OF EXPENSE</u>
PPP Polling 2912 Highwood Blvd Ste 201 Raleigh, NC 27604	G	02/24/2020	\$5,000.00
Tallac Strategies 1280 Terminal Way 35 Reno, NV 89502	E	03/05/2020	\$2,727.36
Nicholas Powell 3510 Comstock Dr Reno, NV 89512	F	03/06/2020	\$400.00
Hasbara 321 S. Arlington Reno, NV 89501	F	03/06/2020	\$500.00

IN KIND EXPENSESReport Period **# 1****Kathleen Sigurdson****District Court Judge, District 2, Department 10**


Name (print)

Office (if applicable)

District (if applicable)

IN KIND EXPENSES IN EXCESS OF \$100

(Transfer Total Value of All In-Kind Expenses to Line 10 of Expenses Summary)

<u>NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO RECEIVED THE IN KIND GOOD OR SERVICE</u>	<u>DESCRIPTION OF IN KIND EXPENSE</u>	<u>DATE OF IN KIND EXPENSE</u> 	<u>VALUE OR COST OF IN KIND EXPENSE</u>

EL201

Revised: 8-13-13

NRS 294A.120; 294A.125;

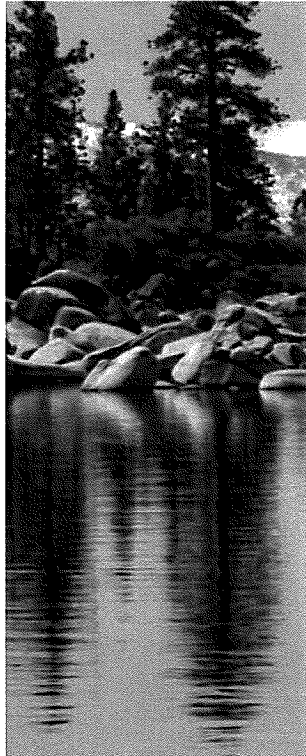
294A.160; 294A.200;

294A.362; 294A.373

R.App. 000628

EXHIBIT “4”

EXHIBIT “4”



Grand Sierra

Back to Search

Entity Type Contributor
Address 2500 E. Second St.
Reno, NV 89595
Total Contributions Amount \$17,528.00

View all contributions from contributors with the same or similar name
View all contributions from contributors with the same or similar address

Contributions Made by Grand Sierra

4 contributions found totaling \$17,528.00.

Contribution Date	File Date	Contribution Amount	Contribution Type	Recipient	Report
1/31/2020	4/15/2020	\$10,000.00	Monetary Contribution	Kathleen Sigurdson	2020 CE Report 1
12/11/2018	1/15/2019	\$1,528.00	In Kind Written Commitment	Bonnie Weber	2018 CE Report 5
12/27/2017	5/16/2018	\$5,000.00	Monetary Contribution	Jason Frierson	2018 Annual CE Filing (Amended)
7/20/2016	1/16/2017	\$1,000.00	Monetary Contribution	Amber Joiner	2016 CE Report 3 (Amended)

Export results to: Excel CSV PDF

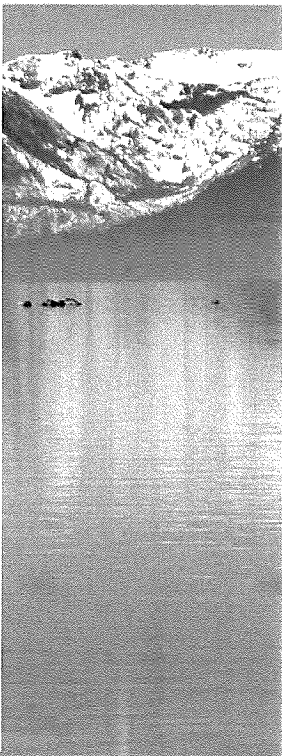


EXHIBIT “5”

EXHIBIT “5”

Print Help? **PRINT****CONTRIBUTIONS AND EXPENSES REPORT****State of Nevada****Kathleen Sigurdson****District Court Judge, District 2, Department 10**

Name

Office (if applicable)

District (if applicable)

3055 Lyon Lane, Washoe Valley, NV, 89704**775-337-0300**

Mailing Address

Telephone No.

k_sigurdson@msn.com

E-Mail Address

Select Appropriate Box(es)

☒ **CANDIDATE**☐ **LEGAL DEFENSE FUND** [What is this?](#)☐ **AMENDED**

- ☐ **Report #1 - Due April 15, 2020**
Period: Jan 01, 2020 - Mar 31, 2020
- ☐ **Report #2 - Due July 15, 2020**
Period: Apr 01, 2020 - Jun 30, 2020
- ☒ **Report #3 - Due October 15, 2020**
Period: Jul 01, 2020 - Sep 30, 2020
- ☐ **Report #4 - Due January 15, 2021**
Period: Oct 01, 2020 - Dec 31, 2020
- ☐ **Annual Filing - Due January 15, 2021**
Period: Jan 01, 2020 - Dec 31, 2020

FILED

Oct 15 2020

**BARBARA K.
CEGAVSKE
SECRETARY OF STATE**

FOR OFFICE USE ONLY

* Report #4 suffices for the 2021 Annual CE Filing only if Report #'s 1, 2, 3, are previously filed this period.

CONTRIBUTIONS SUMMARY

	This Period	Cumulative From Beginning of Report Period #1 Through End of This Reporting Period
1. Total Monetary Contributions Received in Excess of \$100	\$ 95,200.00	\$ 120,000.00
2. Total Monetary Contributions in the Form of Loans Guaranteed by a 3rd-Party in Excess of \$100	\$ 0.00	\$0.00
3. Total Monetary Contributions in the Form of Loans that were Forgiven in Excess of \$100	\$ 0.00	\$0.00
4. Total Amount of Written Commitments for Contributions in Excess of \$100	\$ 0.00	\$0.00
5. Total Value of In Kind Contributions in Excess of \$100	\$ 0.00	\$0.00
6. Total Value of Written Commitments for In Kind Contributions in Excess of \$100	\$ 0.00	\$0.00
7. Total Amount of all Contributions of \$100 or less	\$ 885.00	\$985.00
8. Total Amount of All Contributions (Add Lines 1 through 7)	\$ 96,085.00	\$120,985.00

EXPENSES SUMMARY

9. Total Monetary Expenses Paid in Excess of \$100	\$ 118,367.95	\$135,777.75
10. Total Value In Kind Expenses in Excess of \$100	\$ 0.00	\$0.00
11. Total Amount of all Expenses of \$100 or less	\$ 23.70	\$108.40
12. Total Amount of All Expenses (Add Lines 9 through 11)	\$ 118,391.65	\$135,886.15

ENDING FUND BALANCE

13. Fund balance at the end of the reporting period	\$0.00
---	---------------

AFFIRMATION☒ **I Declare Under an Oath to God that the Forgoing is True and Correct**** A declaration under an oath to God is subject to the same penalties as declaration under perjury
AND☒ **I have agreed to the following terms and conditions:**

I declare, under penalty of perjury or under an oath to God, that the information I submitted herein to the Secretary of State for the State of Nevada is true and correct, and is not submitted for any improper purpose, and that I am authorized to submit the information, and to the best of my knowledge complies with NRS Chapter 294A. I have reviewed the NRS 225.083 Notice. I understand it is unlawful to submit any illegal, unauthorized, fraudulent, forged, deceptive, defamatory, illicit, or improper information, as defined by state and federal law, to the Secretary of State, and agree to indemnify the Secretary of State, and any other parties entitled thereto, for any damages incurred for any unlawful, unauthorized, fraudulent, forged, deceptive, defamatory, illicit, or improper information, as defined by the federal and state law, submitted to the Secretary of State by my use of this electronic filing system. I further understand that I may be subject to criminal (NRS 239.330) and/or civil (NRS 225.084) penalties for submitting any unlawful unauthorized, fraudulent, forged, deceptive, defamatory, illicit, or improper information, as defined by federal and state law. I understand and agree that all information submitted is the property of the Secretary of State, and may be monitored for all lawful purposes. I further understand that during such monitoring, all information, including personal information placed on this system, may be examined, copied, and used for any authorized purpose. By submitting this report I intend to identify myself as the authorized person signing this document and with the present intent to authenticate my signature as such.

Kathleen Sigurdson**10/15/2020**

Signature

Date

R.App. 000633

**MONETARY
CONTRIBUTIONS**Report Period **# 3****Kathleen Sigurdson****District Court Judge, District 2, Department 10**

Name (print)

Office (if applicable)

District (if applicable)

**MONETARY CONTRIBUTIONS IN EXCESS OF \$100 OR,
WHEN ADDED TOGETHER FROM ONE CONTRIBUTOR, THAT EXCEED \$100**

(Transfer Total Amount of All Monetary Contributions to Lines 1, 2, or 3, As Applicable, of Contributions Summary)

NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO MADE CONTRIBUTION	DATE OF CONTRIBUTION	AMOUNT OF CONTRIBUTION	CHECK HERE IF LOAN	NAME AND ADDRESS OF 3rd PARTY IF LOAN GUARANTEED BY 3rd PARTY	NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO FORGAVE THE LOAN, IF DIFFERENT THAN CONTRIBUTOR
Anne Sigurdson 4023 Clover Creek Reno, NV 89519	08/07/2020	\$5,000.00			
Ellen Driscoll 1195 Sherwood Dr. Reno, NV 89509	08/12/2020	\$50.00			
Donna Blackmore 1595 Wheatgrass Dr Reno, NV 89509	08/12/2020	\$50.00			
Lorne Butner 1471 Fraun Court Reno, NV 89519	08/13/2020	\$100.00			
D. Jean Myles 2055 Regent St. Reno, NV 89509	08/13/2020	\$200.00			
Kenneth Meyer 1270 Meridian Ranch Dr Reno, NV 89523	08/17/2020	\$100.00			
Linda Turner 1340 Walking Stick Way Reno, NV 89523	08/19/2020	\$25.00			
Heather Butler Skin Care LLC 465 W. Peckham Reno, NV 89509	08/20/2020	\$100.00			
Jane Cates 567 Mogul Mountain Dr Reno, NV 89523	08/20/2020	\$100.00			
Marta Elis 1045 W. Waverly Dr. Reno, NV 89519	08/27/2020	\$50.00			
J. A. Karhohs 4855 Lakeridge Reno, NV 89509	09/01/2020	\$50.00			
Douglas Ramseth 3333 Menlo Ct Reno, NV 89509	09/05/2020	\$50.00			
Meruelo Media Holdings 4975 W. Pico Blvd Los Angeles, CA 90019	09/14/2020	\$10,000.00			
KLOS Radio, LLC 2600 W. Olive St. Ste 800 Burbank, CA 91505	09/14/2020	\$10,000.00			
KPWR Radio, LLC 2600 W. Olive St. Ste 800 Burbank, CA 91505	09/14/2020	\$10,000.00			
KDAY Radio, LLC 2600 W. Olive St. Ste 800 Burbank, CA 91505	09/14/2020	\$10,000.00			
Herman Weissker, Inc 1645 Brown Ave. Riverside, CA 92509	09/14/2020	\$10,000.00			
Cantamar Property Mgmt, Inc. 9550 Firestone Blvd. #105 Downey, CA 90241	09/14/2020	\$10,000.00			
Herman Weissker Power, Inc.	09/14/2020	\$10,000.00			

R.App. 000634

9550 Firestone Blvd. #105 Downey, CA 90241					
<u>One Call Construction Services</u> 9550 Firestone Blvd. #105 Downey, CA 90241	09/14/2020	\$10,000.00			
<u>Doty Bros Equipment Co</u> 11232 E. Firestone Blvd Norwalk, CA 90650	09/14/2020	\$10,000.00			
<u>Jane Grossman</u> 1665 Green Ash Rd Reno, NV 89511	09/15/2020	\$90.00			
<u>Dave Cherry</u> 4465 Boca Way Spc 102 Reno, NV 89502	09/19/2020	\$20.00			
<u>Denise Brooks</u> 1148 Spartan Ave. Carson City, NV 89701	09/21/2020	\$50.00			
<u>Mary Sherman</u> 1270 Meridian Ranch Dr Reno, NV 89523	09/30/2020	\$50.00			

WRITTEN COMMITMENTS

Report Period # 3

Kathleen Sigurdson

District Court Judge, District 2, Department 10


Name (print) _____

Office (if applicable)

District (if applicable)

**WRITTEN COMMITMENTS FOR CONTRIBUTIONS IN EXCESS OF \$100 OR,
WHEN ADDED TOGETHER FROM ONE ENTITY, THAT EXCEED \$100**

(Transfer Total Amount of All Written Commitments to Line 4 of Contributions Summary)

NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO MADE THE COMMITMENT	DATE OF COMMITMENT 	AMOUNT OF COMMITMENT

R.App. 000635

IN KIND CONTRIBUTIONSReport Period **# 3****Kathleen Sigurdson****District Court Judge, District 2, Department 10**

Name (print)

Office (if applicable)

District (if applicable)

**IN KIND CONTRIBUTIONS IN EXCESS OF \$100 OR,
WHEN ADDED TOGETHER FROM ONE CONTRIBUTOR, THAT EXCEED \$100**
(Transfer Total Value of All In Kind Contributions to Line 5 of Contributions Summary)

<u>NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO MADE IN KIND CONTRIBUTION</u>	<u>DATE OF IN KIND CONTRIBUTION</u> ↑	<u>DESCRIPTION OF IN KIND CONTRIBUTION</u>	<u>VALUE OR COST OF IN KIND CONTRIBUTION</u>	<u>CHECK HERE IF LOAN</u>	<u>NAME AND ADDRESS OF 3rd PARTY IF LOAN GUARANTEED BY 3rd PARTY</u>	<u>NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO FORGAVE THE LOAN, IF DIFFERENT THAN CONTRIBUTOR</u>

R.App- 000636

**WRITTEN COMMITMENTS FOR IN KIND
CONTRIBUTIONS**
Report Period **# 3**
Kathleen Sigurdson
District Court Judge, District 2, Department 10


Name (print)

Office (if applicable)

District (if applicable)

**WRITTEN COMMITMENTS FOR IN KIND CONTRIBUTIONS IN EXCESS OF \$100 OR,
WHEN ADDED TOGETHER FROM ONE ENTITY, THAT EXCEED \$100**

(Transfer Total Value of All In Kind Written Commitments to Line 6 of Contributions Summary)

<u>NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO MADE THE IN KIND WRITTEN COMMITMENT</u>	<u>DATE OF IN KIND WRITTEN COMMITMENT</u> 	<u>VALUE OF IN KIND WRITTEN COMMITMENT</u>

R.App. 000637

EXPENSE CATEGORIESReport Period **# 3****Kathleen Sigurdson****District Court Judge, District 2, Department 10**

Name (print)

Office (if applicable)

District (if applicable)

EXPENSE CATEGORIES (NRS 294A.365)

CATEGORIES	CODE
Office expenses	A
Expenses related to volunteers	B
Expenses related to travel	C
Expenses related to advertising	D
Expenses related to paid staff	E
Expenses related to consultants	F
Expenses related to polling	G
Expenses related to special events	H

R.App. 000638

Expenses related to legal defense fund	I
Goods and services provided in kind for which money would otherwise have been paid	J
Contributions made to: (i) another candidate; (ii) a nonprofit corporation that is registered or required to be registered pursuant to NRS 294A.225; (iii) a PAC that is registered or required to be registered pursuant to NRS 294A.230; or (iv) a Recall Committee that is registered or required to be registered pursuant to NRS 294A.250	K
Fees for filing declarations of candidacy or acceptances of candidacy	L
Repayments or forgiveness of loans	M
Disposal of unspent contributions pursuant to NRS 294A.160	N
Other miscellaneous expenses	O

1 NRS 294A.362 requires "In Kind" contributions and expenses to be reported on a separate form, which is attached hereto.

MONETARY EXPENSESReport Period **# 3****Kathleen Sigurdson****District Court Judge, District 2, Department 10**

Name (print)

Office (if applicable)

District (if applicable)

MONETARY EXPENSES IN EXCESS OF \$100

(Transfer Total Amount of All Campaign Expenses to Line 9 of Expenses Summary)

<u>NAME AND ADDRESS OF PERSON, GROUP OR ORGANIZATION WHO RECEIVED THE PAYMENT FOR THE EXPENSE</u>	<u>CATEGORY (NRS 294A.365)</u>	<u>DATE OF EXPENSE</u>	<u>AMOUNT OF EXPENSE</u>
Tallac Strategies 1280 Terminal Way #35 Reno, NV 89502	F	07/25/2020	\$5,650.00
	F	09/06/2020	\$8,679.08
Nevada State Bank PO Box 990 LAS VEGAS, NV 89125	O	07/30/2020	\$2.50
	O	08/30/2020	\$2.50
	O	09/30/2020	\$2.50
Anedot 4017 Buena Vist St #109 Dallas, TX 75204	O	08/13/2020	\$2.30
	O	08/18/2020	\$4.30
	O	09/16/2020	\$3.90
	O	09/20/2020	\$1.10
	O	09/22/2020	\$2.30
	O	09/30/2020	\$2.30
Nevada State Democratic Party 2320 Paseo Del Prado Ste B107 Las Vegas, NV 89102	O	09/13/2020	\$1,500.00
Benjamin Challinor 627 C Street Apt R Sparks, NV 89431	O	09/14/2020	\$250.00
Ace Studios 3500 Lakeside Ct Suite 214 Reno, NV 89509	F	09/15/2020	\$4,000.00
	F	09/21/2020	\$175.87
	F	09/23/2020	\$7,800.00
Reno Type 1020 S Rock Blvd Reno, NV 89502	D	09/15/2020	\$5,000.00
Spectrum PO Box 94188 Palatine, IL 60094	D	09/18/2020	\$24,922.00
			R.App. 000639

<u>KTVN</u> PO Box 7220 Reno, NV 89510	D	09/18/2020	\$20,689.00
<u>KRNV</u> 1790 Vassar St. Reno, NV 89502	D	09/18/2020	\$12,835.00
<u>KOLO</u> P.O . BOX 10000 Reno, NV 89502	D	09/18/2020	\$16,567.00
<u>Gatusso Coalition</u> 615 Riverside Drive Ste. 201 Reno, NV 89502	F	09/18/2020	\$4,800.00
<u>Public Policy Polling</u> 2912 Highwoods Blvd. Suite 201 Raleigh, NC 27604	O	09/21/2020	\$5,500.00

IN KIND EXPENSES

Report Period **# 3**

Kathleen Sigurdson

District Court Judge, District 2, Department 10

Name (print) _____

Office (if applicable)

District (if applicable)

IN KIND EXPENSES IN EXCESS OF \$100

(Transfer Total Value of All In-Kind Expenses to Line 10 of Expenses Summary)

[illegible]

EL201

Revised: 8-13-13

NRS 294A.120; 294A.125;

294A.160; 294A.200;

294A.362; 294A.373

EXHIBIT “6”

EXHIBIT “6”

ENTITY INFORMATION**ENTITY INFORMATION****Entity Name:**

SB GAMING, LLC

Entity Number:

E0078872014-5

Entity Type:

Domestic Limited-Liability Company (86)

Entity Status:

Active

Formation Date:

02/13/2014

NV Business ID:

NV20141104979

Termination Date:

Perpetual

Annual Report Due Date:

2/28/2021

Series LLC:**Restricted LLC:****REGISTERED AGENT INFORMATION**

Name of Individual or Legal Entity:

C T CORPORATION SYSTEM

Status:

Active

CRA Agent Entity Type:**Registered Agent Type:**

Commercial Registered Agent

NV Business ID:

NV20191497453

Office or Position:**Jurisdiction:**

DELAWARE

Street Address:

701 S CARSON ST STE 200, Carson City, NV, 89701, USA

Mailing Address:**Individual with Authority to Act:**

MATTHEW TAYLOR

Fictitious Website or Domain Name:**OFFICER INFORMATION**☐ **VIEW HISTORICAL DATA**

Title	Name	Address	Last Updated	Status
Manager	Alex Meruelo	2500 E. 2nd Street, Reno, NV, 89595, USA	01/14/2020	Active

Page 1 of 1, records 1 to 1 of 1

[Filing History](#)[Name History](#)[Mergers/Conversions](#)

[Return to Search](#)

[Return to Results](#)

EXHIBIT “7”

EXHIBIT “7”

Home (/AcclaimWeb/) > FBN (/AcclaimWeb/FBN) > Search Type FFN By Name (/AcclaimWeb/FBN/SearchTypeFbnByName)

FFN Name Search

FFN Name

Date Range

From Date

To Date

Select DocTypes...

Document Types

[Export to CSV \(/AcclaimWeb/Search/ExportCsv\)](/AcclaimWeb/Search/ExportCsv)

1 20 items per page 1 - 4 of 4 items

Record (/AcclaimWe...	First Direct Name (/Ac...	First Indir...	Instrument # (/A...	Record Date (/A...	Document...
Order	SAHARA LAS VEGAS	LAS VEGAS RESORT HOLDINGS, LLC	201908151012520	08/15/2019	FFN CERTIFICATE
Order	SAHARA LAS VEGAS	SB GAMING, LLC	201908151012524	08/15/2019	FFN CERTIFICATE
Order	SAHARA LAS VEGAS DODGE, CHRYSLER JEEP RAM	CHAPMAN'S LAS VEGAS DODGE LIMITED LIABILITY COMPANY	201908021011860	08/02/2019	FFN CERTIFICATE
Order	SAHARA LAS VEGAS HOTEL AND CASINO	LAS VEGAS RESORT HOLDINGS, LLC	201908151012522	08/15/2019	FFN CERTIFICATE

1 20 items per page 1 - 4 of 4 items </AcclaimWeb/Search/GetSearchResults>



Copyright 1999 - 2020. Harris Recording Solutions. All Rights Reserved.

EXHIBIT “8”

EXHIBIT “8”

Corporate Office
9550 Firestone Blvd.
Suite 105

Downey, CA 90241

(o) 562.745.2300

(f) 562.745.2341

EXHIBIT “9”

EXHIBIT “9”



Secretary of State
Statement of Information
(Limited Liability Company)

LLC-12

19-B92446

FILED

In the office of the Secretary of State
of the State of California

MAY 16, 2019

This Space For Office Use Only

IMPORTANT — Read instructions **before** completing this form.

Filing Fee — \$20.00

Copy Fees — First page \$1.00; each attachment page \$0.50;
Certification Fee - \$5.00 plus copy fees

1. Limited Liability Company Name (Enter the exact name of the LLC. If you registered in California using an alternate name, see instructions.)

KLOS RADIO, LLC

2. 12-Digit Secretary of State File Number

201910010209

3. State, Foreign Country or Place of Organization (only if formed outside of California)

CALIFORNIA

4. Business Addresses

a. Street Address of Principal Office - Do not list a P.O. Box 4975 W PICO BLVD	City (no abbreviations) LOS ANGELES	State CA	Zip Code 90019
b. Mailing Address of LLC, if different than item 4a 9550 FIRESTONE BLVD, SUITE 105	City (no abbreviations) Downey	State CA	Zip Code 90241
c. Street Address of California Office, if Item 4a is not in California - Do not list a P.O. Box 4975 W PICO BLVD	City (no abbreviations) LOS ANGELES	State CA	Zip Code 90019

5. Manager(s) or Member(s)

If no **managers** have been appointed or elected, provide the name and address of each **member**. At least one name **and** address must be listed. If the manager/member is an individual, complete Items 5a and 5c (leave Item 5b blank). If the manager/member is an entity, complete Items 5b and 5c (leave Item 5a blank). Note: The LLC cannot serve as its own manager or member. If the LLC has additional managers/members, enter the name(s) and addresses on Form LLC-12A (see instructions).

a. First Name, if an individual - Do not complete Item 5b	Middle Name	Last Name	Suffix
b. Entity Name - Do not complete Item 5a MERUELO MEDIA, LLC			
c. Address 4975 W PICO BLVD	City (no abbreviations) LOS ANGELES	State CA	Zip Code 90019

6. Service of Process (Must provide either Individual **OR** Corporation.)

INDIVIDUAL — Complete Items 6a and 6b only. Must include agent's full name and California street address.

a. California Agent's First Name (if agent is not a corporation) MARIO	Middle Name A	Last Name TAPANES	Suffix
b. Street Address (if agent is not a corporation) - Do not enter a P.O. Box 9550 FIRESTONE BLVD, SUITE 105	City (no abbreviations) DOWNEY	State CA	Zip Code 90241

CORPORATION — Complete Item 6c only. Only include the name of the registered agent Corporation.

c. California Registered Corporate Agent's Name (if agent is a corporation) — Do not complete Item 6a or 6b

7. Type of Business

a. Describe the type of business or services of the Limited Liability Company

RADIO BROADCASTING

8. Chief Executive Officer, if elected or appointed

a. First Name	Middle Name	Last Name	Suffix
b. Address	City (no abbreviations)	State	Zip Code

9. The Information contained herein, including any attachments, is true and correct.

05/16/2019

MARIO A TAPANES

Counsel

Date

Type or Print Name of Person Completing the Form

Title

Signature

Return Address (Optional) (For communication from the Secretary of State related to this document, or if purchasing a copy of the filed document enter the name of a person or company and the mailing address. This information will become public when filed. SEE INSTRUCTIONS BEFORE COMPLETING.)

Name: []

Company:

Address:

City/State/Zip: []

EXHIBIT “10”

EXHIBIT “10”



Secretary of State
Statement of Information
(Limited Liability Company)

LLC-12

60

17-470433

FILED
Secretary of State
State of California

MAY 30 2017

IMPORTANT — Read instructions before completing this form.

Filing Fee — \$20.00

Copy Fees — First page \$1.00; each attachment page \$0.50;
Certification Fee — \$5.00 plus copy fees

This Space For Office Use Only

1. Limited Liability Company Name (Enter the exact name of the LLC. If you registered in California using an alternate name, see instructions.)

KPWR RADIO LLC

2. 12-Digit Secretary of State File Number

201713510159

3. State, Foreign Country or Place of Organization (only if formed outside of California)

4. Business Addresses

a. Street Address of Principal Office - Do not list a P.O. Box

9550 FIRESTONE BLVD, SUITE 105

City (no abbreviations)

DOWNEY

State

CA

Zip Code

90241

b. Mailing Address of LLC, if different than Item 4a

City (no abbreviations)

State

Zip Code

c. Street Address of California Office, if Item 4a is not in California - Do not list a P.O. Box

City (no abbreviations)

State

CA

Zip Code

5. Manager(s) or Member(s)

If no managers have been appointed or elected, provide the name and address of each member. At least one name and address must be listed. If the manager/member is an individual, complete Items 5a and 5c (leave Item 5b blank). If the manager/member is an entity, complete Items 5b and 5c (leave Item 5a blank). Note: The LLC cannot serve as its own manager or member. If the LLC has additional managers/members, enter the name(s) and addresses on Form LLC-12A (see instructions).

a. First Name, if an individual - Do not complete Item 5b

Middle Name

Last Name

Suffix

b. Entity Name - Do not complete Item 5a

MERUELO MEDIA, LLC

c. Address

9550 FIRESTONE BLVD, SUITE 105

City (no abbreviations)

DOWNEY

State

CA

Zip Code

90241

6. Service of Process (Must provide either Individual OR Corporation.)

INDIVIDUAL — Complete Items 6a and 6b only. Must include agent's full name and California street address.

a. California Agent's First Name (if agent is not a corporation)

MARIO

Middle Name

A

Last Name

TAPANES

Suffix

b. Street Address (if agent is not a corporation) - Do not enter a P.O. Box

9550 FIRESTONE BLVD, SUITE 105

City (no abbreviations)

DOWNEY

State

CA

Zip Code

90241

CORPORATION — Complete Item 6c only. Only include the name of the registered agent Corporation.

c. California Registered Corporate Agent's Name (if agent is a corporation) — Do not complete Item 6a or 6b

7. Type of Business

a. Describe the type of business or services of the Limited Liability Company

MEDIA BROADCASTING

8. Chief Executive Officer, if elected or appointed

a. First Name

Middle Name

Last Name

Suffix

b. Address

City (no abbreviations)

State

Zip Code

9. The information contained herein, including any attachments, is true and correct.

5/19/2016

Date

ALEX MERUELO

Type or Print Name of Person Completing the Form

Manager of Meruelo Media, LLC, the Manager

Title

Signature

Return Address (Optional) (For communication from the Secretary of State related to this document, or if purchasing a copy of the filed document enter the name of a person or company and the mailing address. This information will become public when filed. SEE INSTRUCTIONS BEFORE COMPLETING.)

Name: **MARIO TAPANES**

Company: **KPWR RADIO LLC**

Address: **9550 FIRESTONE BLVD, SUITE 105**

City/State/Zip: **DOWNEY, CA 90241**

EXHIBIT “11”

EXHIBIT “11”



Secretary of State
Statement of Information
 (Limited Liability Company)

LLC-12

20-B22840

FILED

In the office of the Secretary of State
 of the State of California

MAR 12, 2020

This Space For Office Use Only

IMPORTANT — Read instructions **before completing this form.**

Filing Fee – \$20.00

Copy Fees – First page \$1.00; each attachment page \$0.50;
 Certification Fee - \$5.00 plus copy fees

1. Limited Liability Company Name (Enter the exact name of the LLC. If you registered in California using an alternate name, see instructions.)

KDAY RADIO, LLC

2. 12-Digit Secretary of State File Number

201407310054

3. State, Foreign Country or Place of Organization (only if formed outside of California)

CALIFORNIA

4. Business Addresses

a. Street Address of Principal Office - Do not list a P.O. Box

9550 FIRESTONE BLVD, SUITE 105

City (no abbreviations)

Downey

State

CA

Zip Code

90241

b. Mailing Address of LLC, if different than item 4a

9550 FIRESTONE BLVD, SUITE 105

City (no abbreviations)

Downey

State

CA

Zip Code

90241

c. Street Address of California Office, if Item 4a is not in California - Do not list a P.O. Box

9550 FIRESTONE BLVD, SUITE 105

City (no abbreviations)

Downey

State

CA

Zip Code

90241

5. Manager(s) or Member(s)

If no **managers** have been appointed or elected, provide the name and address of each **member**. At least one name **and** address must be listed. If the manager/member is an individual, complete Items 5a and 5c (leave Item 5b blank). If the manager/member is an entity, complete Items 5b and 5c (leave Item 5a blank). Note: The LLC cannot serve as its own manager or member. If the LLC has additional managers/members, enter the name(s) and addresses on Form LLC-12A (see instructions).

a. First Name, if an individual - Do not complete Item 5b

Middle Name

Last Name

Suffix

b. Entity Name - Do not complete Item 5a

MERUELO MEDIA, LLC

c. Address

9550 FIRESTONE BLVD, SUITE 105

City (no abbreviations)

Downey

State

CA

Zip Code

90241

6. Service of Process (Must provide either Individual OR Corporation.)

INDIVIDUAL – Complete Items 6a and 6b only. Must include agent's full name and California street address.

a. California Agent's First Name (if agent is **not** a corporation)

Mario

Middle Name

A

Last Name

Tapanes

Suffix

b. Street Address (if agent is **not** a corporation) - **Do not enter a P.O. Box**

9550 FIRESTONE BLVD, SUITE 105

City (no abbreviations)

Downey

State

CA

Zip Code

90241

CORPORATION – Complete Item 6c only. Only include the name of the registered agent Corporation.

c. California Registered Corporate Agent's Name (if agent is a corporation) – Do not complete Item 6a or 6b

7. Type of Business

a. Describe the type of business or services of the Limited Liability Company

RADIO BROADCASTING

8. Chief Executive Officer, if elected or appointed

a. First Name

Middle Name

Last Name

Suffix

b. Address

City (no abbreviations)

State

Zip Code

9. The Information contained herein, including any attachments, is true and correct.

03/12/2020

Alex Meruelo

President of Manager

Date

Type or Print Name of Person Completing the Form

Title

Signature

Return Address (Optional) (For communication from the Secretary of State related to this document, or if purchasing a copy of the filed document enter the name of a person or company and the mailing address. This information will become public when filed. SEE INSTRUCTIONS BEFORE COMPLETING.)

Name:

Company:

Address:

City/State/Zip:

EXHIBIT “12”

EXHIBIT “12”



California Secretary of State Electronic Filing

FILED

Secretary of State
State of California

Corporation - Statement of Information

Entity Name: HERMAN WEISSKER, INC.

Entity (File) Number: C0375489

File Date: 04/03/2020

Entity Type: Corporation

Jurisdiction: CALIFORNIA

Document ID: GE63387

Detailed Filing Information

1. Entity Name: **HERMAN WEISSKER, INC.**
2. Business Addresses:
 - a. Street Address of Principal Office in California:
1645 BROWN AVENUE
Riverside, California 92509
United States of America
 - b. Mailing Address:
9550 Firestone Blvd., Suite 105
Downey, California 90241
United States of America
 - c. Street Address of Principal Executive Office:
1645 BROWN AVENUE
Riverside, California 92509
United States of America
3. Officers:
 - a. Chief Executive Officer:
LUIS A ARMONA
9550 Firestone Blvd., Suite 105
Downey, California 90241
United States of America
 - b. Secretary:
MARIO A TAPANES
9550 Firestone Blvd., Suite 105
Downey, California 90241
United States of America

Document ID: GE63387



California Secretary of State Electronic Filing

Officers (cont'd):

c. Chief Financial Officer:

ALLEN STOLLER
9550 Firestone Blvd., Suite 105
Downey, California 90241
United States of America

4. Director:

ALEX MERUELO
9550 Firestone Blvd., Suite 105
Downey, California 90241
United States of America

Number of Vacancies on the Board of
Directors:

0

5. Agent for Service of Process:

MARIO A TAPANES
9550 FIRESTONE BLVD., SUITE 105
DOWNEY, California 90241
United States of America

6. Type of Business:

UTILITY CONSTRUCTION

By signing this document, I certify that the information is true and correct and that I am authorized by California law to sign.

Electronic Signature: MARIO A TAPANES

Use bizfile.sos.ca.gov for online filings, searches, business records, and resources.

Document ID: GE63387



California Secretary of State Electronic Filing

Corporation - Attachment to Statement of Information

List of Additional Directors:

1. LUIS A ARMONA
9550 Firestone Blvd., Suite 105
Downey, California 90241
United States of America
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.

Document ID: GE63387

EXHIBIT “13”

EXHIBIT “13”



California Secretary of State
Electronic Filing



Corporation - Statement of Information No Change

Entity Name: **CANTAMAR PROPERTY MANAGEMENT, INC.**

Entity (File) Number: C2016247

File Date: 08/26/2020

Entity Type: Corporation

Jurisdiction: CALIFORNIA

Document ID: GH98458

There has been no change in any of the information contained in the previous complete Statement of Information filed with the California Secretary of State.

By signing this document, I certify that the information is true and correct and that I am authorized by California law to sign.

Electronic Signature: **Alex Meruelo**

Use bizfile.sos.ca.gov for online filings, searches, business records, and resources.

Document ID: GH98458



State of California

Kevin Shelley

Secretary of State

STATEMENT OF INFORMATION

(Domestic Stock Corporation)

S

E-091397

FILED

SACRAMENTO, CALIFORNIA

Dec - 16 2004

FEES (Filing and Disclosure): \$25.00. If amendment, see instructions.

IMPORTANT - READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

1. **CORPORATE NAME** (Please do not alter if name is preprinted.)

C2016247

CANTAMAR PROPERTY MANAGEMENT, INC.

9550 FIRESTONE BLVD., SUITE 105
DOWNEY, CA 90241

Kevin Shelley

Kevin Shelley
Secretary of State

This Space For Filing Use Only

CALIFORNIA CORPORATE DISCLOSURE ACT (Corporations Code section 1502.1)

A publicly traded corporation must file with the Secretary of State a Corporate Disclosure Statement (Form SI-PT) annually, within 150 days after the end of its fiscal year. Please see reverse for additional information regarding publicly traded corporations.

COMPLETE ADDRESSES FOR THE FOLLOWING (Do not abbreviate the name of the city. Items 2 and 3 cannot be P.O. Boxes.)

2. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE CITY AND STATE ZIP CODE
9550 FIRESTONE BLVD., SUITE 105 DOWNEY, CA 90241

3. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY CITY STATE ZIP CODE
9550 FIRESTONE BLVD., SUITE 105 DOWNEY, CA 90241

NAMES AND COMPLETE ADDRESSES OF THE FOLLOWING OFFICERS (The corporation must have these three officers. A comparable title for the specific officer may be added; however, the preprinted titles on this form must not be altered.)

4. CHIEF EXECUTIVE OFFICER/ ADDRESS CITY AND STATE ZIP CODE
ALEX MERUELO 9550 FIRESTONE BLVD., SUITE 105 DOWNEY, CA 90241

5. SECRETARY/ ADDRESS CITY AND STATE ZIP CODE
ALEX MERUELO 9550 FIRESTONE BLVD., SUITE 105 DOWNEY, CA 90241

6. CHIEF FINANCIAL OFFICER/ ADDRESS CITY AND STATE ZIP CODE
ALEX MERUELO 9550 FIRESTONE BLVD., SUITE 105 DOWNEY, CA 90241

NAMES AND COMPLETE ADDRESSES OF ALL DIRECTORS, INCLUDING DIRECTORS WHO ARE ALSO OFFICERS (The corporation must have at least one director. Attach additional pages, if necessary.)

7. NAME ADDRESS CITY AND STATE ZIP CODE
ALEX MERUELO 9550 FIRESTONE BLVD., SUITE 105 DOWNEY, CA 90241

8. NAME ADDRESS CITY AND STATE ZIP CODE

9. NAME ADDRESS CITY AND STATE ZIP CODE

10. NUMBER OF VACANCIES ON THE BOARD OF DIRECTIONS, IF ANY: 0

AGENT FOR SERVICE OF PROCESS (If the agent is an individual, the agent must reside in California and Item 12 must be completed with a California address. If the agent is another corporation, the agent must have on file with the California Secretary of State a certificate pursuant to Corporations Code section 1505 and Item 12 must be left blank.)

11. NAME OF AGENT FOR SERVICE OF PROCESS

MARIO A TAPANES

12. ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF AN INDIVIDUAL CITY STATE ZIP CODE
9550 FIRESTONE BLVD., SUITE 105 DOWNEY, CA 90241

TYPE OF BUSINESS

13. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION

PROPERTY MANAGEMENT

14. BY SUBMITTING THIS STATEMENT OF INFORMATION TO THE SECRETARY OF STATE, THE CORPORATION CERTIFIES THE INFORMATION CONTAINED HEREIN, INCLUDING ANY ATTACHMENTS, IS TRUE AND CORRECT.

ALEX MERUELO

PRESIDENT

12/16/2004

TYPE OR PRINT NAME OF PERSON COMPLETING THE FORM

SIGNATURE

TITLE

DATE

EXHIBIT “14”

EXHIBIT “14”



California Secretary of State Electronic Filing

FILED
Secretary of State
State of California

Corporation - Statement of Information

Entity Name: **HERMAN WEISSKER POWER, INC.**

Entity (File) Number: C4084666

File Date: 08/31/2020

Entity Type: Corporation

Jurisdiction: CALIFORNIA

Document ID: GJ12402

Detailed Filing Information

1. Entity Name: HERMAN WEISSKER POWER, INC.
2. Business Addresses:
 - a. Street Address of Principal Office in California: 1700 E. VIA BURTON STREET
ANAHEIM, California 92806
United States of America
 - b. Mailing Address: 9550 FIRESTONE BLVD, SUITE 105
DOWENY, California 90241
United States of America
 - c. Street Address of Principal Executive Office: 1700 E. VIA BURTON STREET
ANAHEIM, California 92806
United States of America
3. Officers:
 - a. Chief Executive Officer: LUIS A ARMONA
9550 FIRESTONE BLVD, SUITE 105
DOWENY, California 90241
United States of America
 - b. Secretary: MARIO A TAPANES
9550 FIRESTONE BLVD, SUITE 105
DOWENY, California 90241
United States of America

Document ID: GJ12402



California Secretary of State Electronic Filing

Officers (cont'd):

c. Chief Financial Officer:

ALLEN S STOLLER
9550 FIRESTONE BLVD, SUITE 105
DOWENY, California 90241
United States of America

4. Director:

ALEX MERUELO
9550 FIRESTONE BLVD, SUITE 105
DOWENY, California 90241
United States of America

Number of Vacancies on the Board of
Directors:

0

5. Agent for Service of Process:

MARIO A TAPANES
9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America

6. Type of Business:

UTILITY CONSTRUCTION

By signing this document, I certify that the information is true and correct and that I am authorized by California law to sign.

Electronic Signature: MARIO A TAPANES

Use bizfile.sos.ca.gov for online filings, searches, business records, and resources.

Document ID: GJ12402



California Secretary of State Electronic Filing

Corporation - Attachment to Statement of Information

List of Additional Directors:

1. LUIS A ARMONA
9550 FIRESTONE BLVD, SUITE 105
DOWENY, California 90241
United States of America
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.

Document ID: GJ12402

EXHIBIT “15”

EXHIBIT “15”



California Secretary of State Electronic Filing

FILED

Secretary of State
State of California

Corporation - Statement of Information

Entity Name: **ONE CALL CONSTRUCTION
SERVICES INC.**

Entity (File) Number: C3808489

File Date: 08/31/2020

Entity Type: Corporation

Jurisdiction: CALIFORNIA

Document ID: GJ12596

Detailed Filing Information

1. Entity Name: ONE CALL CONSTRUCTION
SERVICES INC.
2. Business Addresses:
 - a. Street Address of Principal
Office in California: 9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America
 - b. Mailing Address: 9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America
 - c. Street Address of Principal
Executive Office: 9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America
3. Officers:
 - a. Chief Executive Officer: LUIS A ARMONA
9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America
 - b. Secretary: MARIO A TAPANES
9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America

Document ID: GJ12596



California Secretary of State Electronic Filing

Officers (cont'd):

c. Chief Financial Officer:

ALLEN S STOLLER
9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America

4. Director:

LUIS A ARMONA
9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America

Number of Vacancies on the Board of
Directors:

0

5. Agent for Service of Process:

MARIO A TAPAPNES
9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America

6. Type of Business:

CONSTRUCTION SUPPORT
SERVICES

By signing this document, I certify that the information is true and correct and that I am authorized by California law to sign.

Electronic Signature: MARIO A TAPANES

Use bizfile.sos.ca.gov for online filings, searches, business records, and resources.

Document ID: GJ12596



California Secretary of State Electronic Filing

Corporation - Attachment to Statement of Information

List of Additional Directors:

1. **ALEX MERUELO**
9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.

Document ID: GJ12596

EXHIBIT “16”

EXHIBIT “16”



California Secretary of State
Electronic Filing

FILED

Secretary of State
State of California

Corporation - Statement of Information

Entity Name: **DOTY BROS. EQUIPMENT CO.**

Entity (File) Number: C0369219

File Date: 08/31/2020

Entity Type: Corporation

Jurisdiction: CALIFORNIA

Document ID: GJ12764

Detailed Filing Information

1. Entity Name: DOTY BROS. EQUIPMENT CO.
2. Business Addresses:
 - a. Street Address of Principal Office in California: 11232 E. FIRESTONE BLVD
NORWALK, California 90650
United States of America
 - b. Mailing Address: 9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America
 - c. Street Address of Principal Executive Office: 11232 E. FIRESTONE BLVD
NORWALK, California 90650
United States of America
3. Officers:
 - a. Chief Executive Officer: LUIS A ARMONA
9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America
 - b. Secretary: MARIO A TAPANES
9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America

Document ID: GJ12764



California Secretary of State Electronic Filing

Officers (cont'd):

c. Chief Financial Officer:

ALLEN S STOLLER
9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America

4. Director:

ALEX MERUELO
9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America

Number of Vacancies on the Board of
Directors:

0

5. Agent for Service of Process:

MARIO A TAPANES
9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America

6. Type of Business:

UTILITY CONSTRUCTIONI

By signing this document, I certify that the information is true and correct and that I am authorized by California law to sign.

Electronic Signature: MARIO A TAPANES

Use bizfile.sos.ca.gov for online filings, searches, business records, and resources.

Document ID: GJ12764



California Secretary of State Electronic Filing

Corporation - Attachment to Statement of Information

List of Additional Directors:

1. LUIS A ARMONA
9550 FIRESTONE BLVD, SUITE 105
DOWNEY, California 90241
United States of America
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.

Document ID: GJ12764

EXHIBIT “17”

EXHIBIT “17”



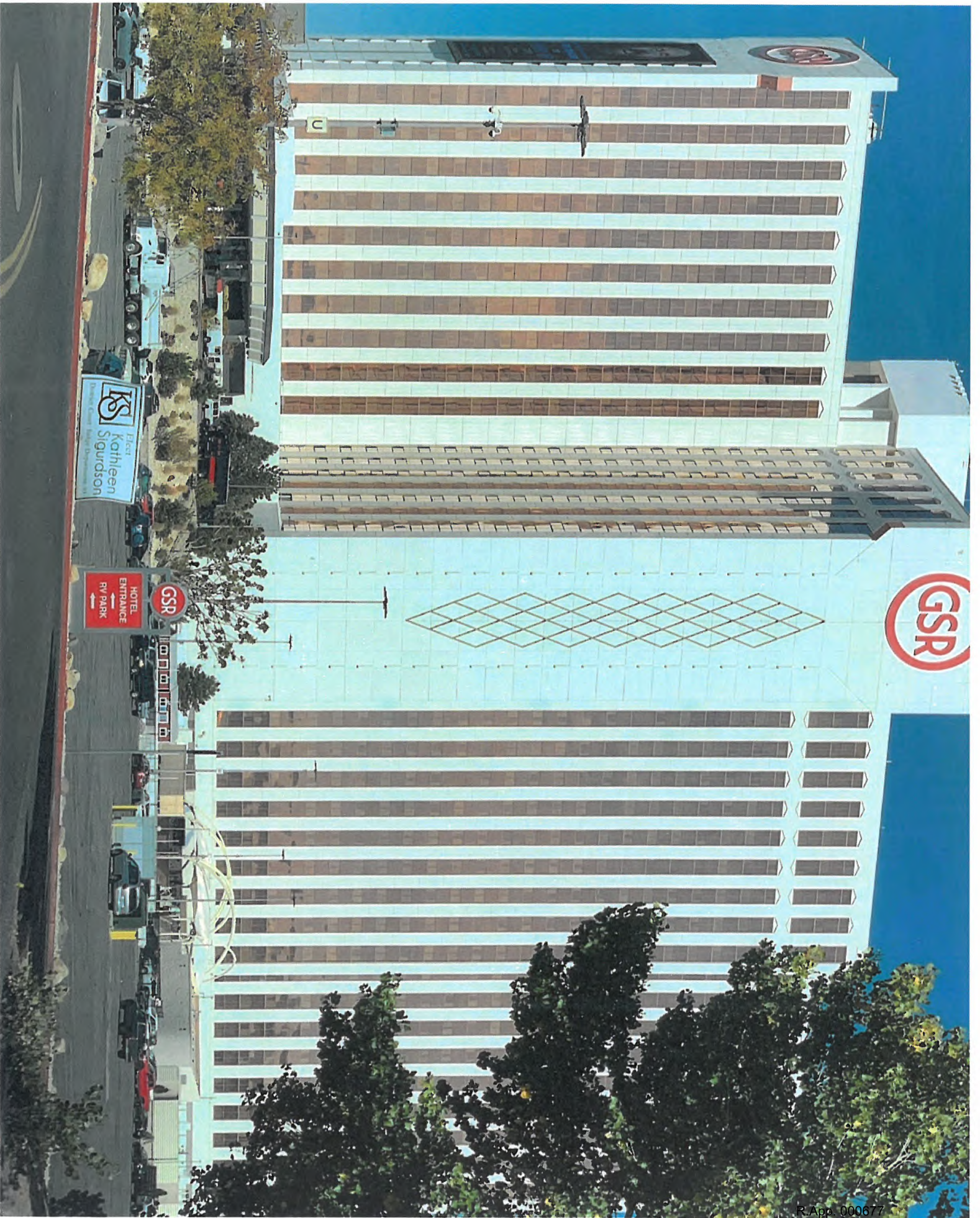








EXHIBIT “18”

EXHIBIT “18”

reno gazette journal

POLITICS

Washoe District Court Election Results: Sigurdson, Dollinger and Robb win races

Kristin Oh Reno Gazette Journal

Published 10:51 p.m. PT Nov. 3, 2020 | Updated 2:17 p.m. PT Nov. 16, 2020

Update: Reno lawyer Kathleen Sigurdson won the judge seat for Washoe District Court Department 10, with 51.40% of the votes. Her competitor, Judge Elliott Sattler, who has been working in the Washoe District Court since 2013, received 48.60% of the votes.

Washoe County released official election results Monday morning.

Sattler had received the highest ranking among general jurisdiction judges in the 2020 Washoe County Bar Association judge survey. According to the survey, Sattler received a ranking of 4.6 and 97.2% of survey participants responded that they believed Sattler should be retained.

Billionaire and owner of the Grand Sierra Resort, Alex Meruelo, made several sizable donations to Sigurdson's campaign.

Meruelo Media Holdings contributed \$10,000 to Sigurdson's campaign on Sept. 14.

She also received \$10,000 donations each from KLOS Radio, KDAY Radio and KPWR Radio. All are owned by Meruelo Media Holdings and based in California. Several of Meruelo's other companies also contributed \$10,000 each to her campaign.

Andrew Diss, vice president of government affairs of GSR, said that it is common for companies from other states to contribute to campaigns, adding that these contributions came from the companies, not Meruelo himself and were all legal donations.

Sigurdson said that she was grateful for all donations she received. Sattler declined to comment.

More: RGJ analysis: California transplants are influencing the vote in Washoe County. Here's how

For the District 11 Family Court judge seat, Family Court Master Paige Dollinger won with 54.51% of the votes. Her competitor, Family Court Master Greg Shannon, received 45.49% of the votes.

Incumbent Judge Bridget Robb won the District Court Department 13 race with 63.31% of the votes. Her competitor and former law clerk, Aaron Bushur, received 36.39% of the votes.

Original: Among the closely watched Washoe County elections, Reno lawyer Kathleen Sigurdson is competing against Judge Elliot Sattler, who has been working in the Washoe District Court since 2013. They are competing for the District Court Department 10 judge seat.

Unofficial results as of Thursday morning show that Sigurdson has a slim lead of 51% of the votes. Sattler has 49% of the votes.

Keep an eye on the Reno Gazette Journal's results page for a first look at local races.

More: Voter guide: Sattler and Sigurdson vie for judge seats in District Court Department 10

District Court Department 11

Fighting for the District Court Department 11 Family Court Judge seat are Court Masters Paige Dollinger and Greg Shannon.

Unofficial results as of Thursday morning show that Dollinger is ahead with 55% of the votes. Shannon has 45% of the votes.

The seat was previously held by Reno Judge Chuck Weller, who decided not to see re-election this year. Early in his career, he was shot by pawn shop millionaire Darren Mack, whose divorce he was presiding over. Weller had a tumultuous final term and was fined \$2,500 by the Nevada Commission on Judicial Discipline for making “disturbing” and “offensive” comments about women.

During the primaries, Dollinger received 45% of the votes and Shannon received 31%.

More: Election 2020: Dollinger, Shannon vie for Chuck Weller's seat in Washoe Family Court

District Court Department 13

Competing for the judge seat in District Court Department 13, Family Court are incumbent Brigit Robb and her former law clerk, Aaron Bushur.

Robb has worked with the Second District Court since 2008. Bushur served as Robb's law clerk from 2008 to 2010. He is currently a lawyer that specializes in family law.

Unofficial results show that Robb has 64% of the votes, according to registrar numbers released Thursday morning. Bushurr has 36% of the votes.

More: Judge Bridget Robb's former clerk Aaron Bushur running against her for family court seat

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

G. ROBERTSON, ESQ.
STEFANIE SHARP, ESQ.
JARRAD MILLER, ESQ.
F.SHARP, ESQ.
DAVID MCELHINNEY,
ESQ.
JENNIFER HOSTETLER,
ESQ.
JONATHAN TEW, ESQ.

And, I deposited in the County mailing system for postage and mailing with the United States Postal Service in Reno, Nevada, a true and correct copy of the attached document addressed as follows:

Michael Decker

1 CODE 3370

2
3
4
5
6 IN THE SECOND JUDICIAL DISTRICT COURT
7 OF THE STATE OF NEVADA, IN AND FOR THE COUNTY OF WASHOE
8

9 ALBERT THOMAS, individually; et al.,

Case No. CV12-02222

10 Plaintiffs,

Dept. No. 9

11 Vs.
12

13 MEI-GSR HOLDINGS, LLC, a Nevada Limited Liability
14 Company; AM-GSR Holdings, LLC, a Nevada Limited
15 Liability Company; GRAND SIERRA RESORT UNIT
16 OWNERS' ASSOCIATION, a Nevada Non Profit
17 Corporation; GAGE VILLAGE COMMERCIAL
18 DEVELOPMENT, LLC, a Nevada Limited Liability Company;
19 and, DOES I-X, inclusive,

20 Defendants.
21 _____/

22 **ORDER DISQUALIFYING ALL JUDICIAL OFFICERS OF THE SECOND**
23 **JUDICIAL DISTRICT COURT**
24

25 Pursuant to the Nevada Code of Judicial Conduct Rule 2.11, the undersigned concludes
26 disqualification of all judicial officers in the Second Judicial District Court is necessary in this
27 matter in order to avoid any appearance of impropriety and to avoid the question of impartiality.

28 Accordingly, in the interest of justice, and good cause appearing therefore,

IT IS HEREBY ORDERED:

1. All current judicial officers in the Second Judicial District Court are disqualified from acting in this matter; and,

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

2. Clerk of the Court Jacqueline Bryant shall coordinate with the Administrative Office of the Courts to request assignment of this matter to Senior Judge Steven Kosach.

IT IS SO ORDERED.

Dated: January 21, 2021.



Chief District Court Judge

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of the Second Judicial District Court of the State of Nevada, County of Washoe; that on this 21st day of January, 2021, I deposited for mailing with the United States Postal Service in Reno, Nevada, a true copy of the attached document addressed to:

[NONE]

Further, I certify that on the 21st day of January, 2021, I electronically filed the foregoing with the Clerk of the Court electronic filing system, which will send notice of electronic filing to the following:

DAVID MCELHINNEY, ESQ. for GAGE VILLAGE COMMERCIAL DEVELOPMENT,
LLC et al

JONATHAN TEW, ESQ. for D'ARCY NUNN et al

JARRAD MILLER, ESQ. for D'ARCY NUNN et al

G. ROBERTSON, ESQ. for D'ARCY NUNN et al

F. SHARP, ESQ. for RICHARD M TEICHNER

JENNIFER HOSTETLER, ESQ. for GAGE VILLAGE COMMERCIAL DEVELOPMENT,
LLC et al

STEFANIE SHARP, ESQ. for RICHARD M TEICHNER

Bill

Judicial Assistant

CODE: \$3375
Jarrad C. Miller, Esq. (NV Bar No. 7093)
Jonathan Joel Tew, Esq. (NV Bar No. 11874)
Robertson, Johnson, Miller & Williamson
50 West Liberty Street, Suite 600
Reno, Nevada 89501
(775) 329-5600
jarrad@nvlawyers.com
jon@nvlawyers.com
Attorneys for Plaintiffs

SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE

ALBERT THOMAS, individually; *et al.*,

Plaintiffs,

vs.

Case No.: CV12-02222
Dept. No.: OJ28

MEI-GSR Holdings, LLC, a Nevada Limited
Liability Company; AM-GSR Holdings, LLC,
a Nevada Limited Liability Company;
GRAND SIERRA RESORT UNIT
OWNERS' ASSOCIATION, a Nevada
nonprofit corporation; GAGE VILLAGE
COMMERCIAL DEVELOPMENT, LLC, a
Nevada Limited Liability Company; and DOE
DEFENDANTS 1 THROUGH 10, inclusive,

Defendants.

PLAINTIFFS' PEREMPTORY CHALLENGE OF JUDGE

Plaintiffs, by and through their counsel of record, the law firm of Robertson, Johnson, Miller & Williamson, hereby exercise a peremptory challenge against the Senior Judge recently assigned to hear and resolve the remaining matters of this case, pursuant to the provisions of Nevada Supreme Court Rule 48.1.

The peremptory challenge is directed against the Honorable Steven Kosach, Senior Judge. Plaintiffs' peremptory challenge is accompanied by payment of the sum of Four Hundred Fifty Dollars (\$450.00) in accordance with the provisions of SCR 48.1.

Plaintiffs respectfully request that this matter be reassigned to a different Senior Judge for all further proceedings.

1 **AFFIRMATION**

2 Pursuant to NRS § 239B.030, the undersigned does hereby affirm that the preceding
3 document does not contain the social security number of any person.

4 RESPECTFULLY SUBMITTED this 22nd day of January, 2021.

5 ROBERTSON, JOHNSON,
6 MILLER & WILLIAMSON

7 By: /s/ Jarrad C. Miller

8 Jarrad C. Miller, Esq.
Jonathan J. Tew, Esq.
Attorneys for Plaintiff

9 **CERTIFICATE OF SERVICE**

10 Pursuant to NRCP 5(b), I hereby certify that I am an employee of Robertson, Johnson,
11 Miller & Williamson, 50 West Liberty Street, Suite 600, Reno, Nevada 89501, over the age of
12 18, and not a party within this action. I further certify that on the 22nd day of January, 2021, I
13 electronically filed the foregoing **PLAINTIFFS' PEREMPTORY CHALLENGE OF JUDGE**
14 with the Clerk of the Court by using the ECF system which served the following parties
15 electronically:

16 David C. McElhinney, Esq.
17 Lewis Roca Rothgerber Christie, LLP
18 One East Liberty Street, Suite 300
Reno, NV 89501
Attorney for Defendants

F. DeArmond Sharp, Esq.
Stefanie T. Sharp, Esq.
Robison, Sharp Sullivan & Brust
71 Washington Street
Reno, NV 89503
*Attorneys for Receiver Richard M.
Teichner*

20 /s/ Teresa W. Stovak
21 An Employee of Robertson, Johnson,
22 Miller & Williamson
23
24
25
26
27
28

--FILED--
Administrative Office of the Courts
Date: 02/19/21

By: Deborah Crews

**SUPREME COURT OF THE STATE OF NEVADA
ADMINISTRATIVE OFFICE OF THE COURTS**

IN THE MATTER OF THE ASSIGNMENT OF
A SENIOR JUDGE

Order No. 21-00267

MEMORANDUM OF TEMPORARY ASSIGNMENT

WHEREAS all district judges in the Second Judicial District have recused themselves from hearing any and all matters in *Albert Thomas, individually; et al., v. MEI-GSR Holdings, LLC, a Nevada Limited Liability Company; AM-GSR Holdings, LLC, a Nevada Limited Liability Company; Grand Sierra Resort Unit Owners' Association, a Nevada Non Profit Corporation; Gage Village Commercial Development, LLC, a Nevada Limited Liability Company; and Does I – X, inclusive*, Case Number CV12-02222, now therefore,

IT IS HEREBY ORDERED that the Honorable Nancy M. Saitta, Senior Justice, is assigned to hear any and all matters in *Albert Thomas, individually; et al., v. MEI-GSR Holdings, LLC, a Nevada Limited Liability Company; AM-GSR Holdings, LLC, a Nevada Limited Liability Company; Grand Sierra Resort Unit Owners' Association, a Nevada Non Profit Corporation; Gage Village Commercial Development, LLC, a Nevada Limited Liability Company; and Does I – X, inclusive*, Case Number CV12-02222, and she shall have authority to sign any orders arising out of this assignment. The Court shall notify

1 the parties of the assignment and provide Nancy M. Saitta, Senior Justice with any
2 assistance as requested.

3 Entered this 19 day of February 2021.

4 NEVADA SUPREME COURT

5 By: , Justice

6 Copy: The Honorable Nancy M. Saitta, Senior Justice
7 The Honorable Scott Freeman, Chief Judge, Second Judicial District Court
8 Jackie Bryant, Court Administrator, Second Judicial District Court
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

CODE: 2040
Jarrad C. Miller, Esq. (NV Bar No. 7093)
Jonathan J. Tew, Esq. (NV Bar No. 11874)
Briana N. Collings, Esq. (NV Bar No. 14694)
Robertson, Johnson, Miller & Williamson
50 West Liberty Street, Suite 600
Reno, Nevada 89501
(775) 329-5600
jarrad@nvlawyers.com
jon@nvlawyers.com
briana@nvlawyers.com

Robert L. Eisenberg, Esq., (NV Bar No. 0950)
Todd R. Alexander, Esq. (NV Bar No. 10846)
Lemons, Grundy & Eisenberg
6005 Plumas Street, Third Floor
Reno, Nevada 89519
Telephone: (775) 786-6868
Facsimile: (775) 786-9716
rle@lge.net
tra@lge.net

Attorneys for Plaintiffs

SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

IN AND FOR THE COUNTY OF WASHOE

ALBERT THOMAS, individually; *et al.*,

Plaintiffs,

vs.

Case No. CV12-02222
Dept. No. OJ37

MEI-GSR Holdings, LLC, a Nevada limited liability company, GRAND SIERRA RESORT UNIT OWNERS' ASSOCIATION, a Nevada nonprofit corporation, GAGE VILLAGE COMMERCIAL DEVELOPMENT, LLC, a Nevada limited liability company; AM-GSR HOLDINGS, LLC, a Nevada limited liability company; and DOE DEFENDANTS 1 THROUGH 10, inclusive,

Defendants.

PLAINTIFFS' MATRIX AND MOTION FOR CLARIFICATION

1 Plaintiffs, by and through their counsel of record, the law firms of Robertson, Johnson,
2 Miller & Williamson and Lemons, Grundy & Eisenberg, hereby submit their Matrix and Motion
3 for Clarification Regarding Submitted Motions (“Motion”)

4 This Motion is supported by the attached memorandum of points and authorities, the
5 exhibits attached hereto, and all other documents on file before this Court pertaining to the
6 above-referenced matter.

7 DATED this 8th day of August, 2022.

8 ROBERTSON, JOHNSON,
9 MILLER & WILLIAMSON

10 By: /s/ Jonathan Joel Tew

Jarrad C. Miller, Esq.
Jonathan Joel Tew, Esq.
Briana N. Collings, Esq.
Attorneys for Plaintiffs

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. INTRODUCTION**

3 On July 18, 2022, the Court held a Phase Two hearing (“Hearing”) on punitive damages.
4 At its conclusion, the Court requested that the parties each prepare a matrix of pending,
5 submitted motions (“Matrix”). The goal of the Matrix is to: (1) itemize the pending, submitted
6 motions based upon the priority in which the Court should decide said motions; and (2) identify
7 any motions that have been rendered moot by subsequent Court decisions. Additionally, the
8 Court directed the Plaintiffs and Defendants to exchange their matrices (“Matrices”) within ten
9 (10) business days of the Hearing to see if the parties could reach an agreement on the order in
10 which the motions should be resolved. Finally, the Court ordered that if the parties could not
11 agree on the order of the motions to be decided, that each side submit a motion for clarification
12 explaining the basis for their motion prioritization.

13 On August 4, 2022, the parties exchanged Matrices. On August 5, 2022, the parties
14 concluded that they would not be able to reach an agreement on a singular Matrix reflecting the
15 order in which the pending motions should be resolved. Accordingly, Plaintiffs hereby submit
16 the instant Matrix and Motion for Clarification to assist the Court with its rulings.

17 **II. PLAINTIFFS’ MATRIX OF PENDING AND SUBMITTED MOTIONS**

18 Attached as Exhibit 1 is Plaintiffs’ Matrix they provided to Defendants. As set forth
19 below, some motions have been rendered moot by certain orders of the Court. Those motions
20 will be identified accordingly. Further, in Section III of this Matrix and Motion for Clarification,
21 is a Flow Chart proposing in very simple terms why the Court: (1) should adopt the Plaintiffs’
22 Matrix; and (2) grant/deny specific motions.

23 Additionally, the Plaintiffs will email to the Court previously-provided and/or new
24 proposed orders in Word format to assist the Court in light of the fact that the Senior Justice has
25 not had the benefit of a law clerk during her time administering this incredibly complex and
26 voluminously-briefed case. Finally, since each respective motion stream has been extensively
27 briefed, and each proposed order lays out the reasoning behind why it should be granted or
28

denied, this Matrix and Motion for Clarification will not advance substantive argument other than to explain why the priority of ruling on specific motions is so essential.

The Plaintiffs have separated the Matrix into several tracks which set forth: (1) Essential, Time-Sensitive Motions impacting the case and the receivership (now shut down by the Defendants in violation of the Findings of Fact, Conclusions of Law and Judgment and multiple other Court Orders); (2) Motions Impacting the Final Judgment; (3) Other Receivership Motions; and (4) Motions Rendered Moot.

Priority Number	<u>Essential, Time-Sensitive Motions</u>	Submission Date
1	Plaintiffs' 04/25/22 Motion for Order to Show Cause (Defendants' contempt for violations of Court's orders, including 01/04/22 orders)	5/16/22
2	Plaintiffs' 03/02/22 Motion for Order to Show Cause (Defendants' contempt for violations of Court's orders, including 01/04/22 orders)	4/5/22
3	Plaintiffs' 02/01/22 Motion for Order to Show Cause (Defendants' contempt for violations of Court's orders, including 01/04/22 orders)	2/28/22
4	Plaintiffs' 11/19/21 Motion for Order to Show Cause (Defendants' contempt for violating 01/17/15 Order)	12/23/21
5	Plaintiffs' 09/27/21 Motion for Order to Show Cause (Defendants' contempt for violating 01/17/15 Order)	11/05/21
6	Plaintiffs' 2/11/21 Motion for Order to Show Cause (Defendants' contempt for violating 12/24/20 order)	2/19/21
7	Receiver's 04/22/22 Ex Parte Request for Clarification Regarding Whether Updated Fees Apply to all 670 units	4/22/22
8	Plaintiffs' Application for Temporary Restraining Order, and Motion for Preliminary Injunction	3/24/22
9	Defendants' Motion for Relief from Obligation to Supplement Under NRCP 26(e)(1) and Motion to Reinstate Attorney Client Privilege	1/13/22
	<u>Motions to Reach Final, Appealable Judgment</u>	
10	Plaintiffs' 11/16/2015 Motion in Support of Award for Punitive Damages ("Punitive Damages Motion") ** The Court indicated at the beginning of the July 18, 2022 Phase Two Hearing on Punitive Damages that Plaintiffs' proposed Findings of Fact, Conclusions of Law, and Order on the Punitive Damages Motion would be GRANTED, subject to some revisions. The Court then proceeded to hold the Phase	

	Two Hearing on the amount of damages to be awarded on July 18, 2022.	
11	Court's Ruling on the Amount of Punitive Damages to be Awarded Will Result in a Final, Appealable Judgment	TBD
	<u>Other Receivership Motions</u>	
12	Defendants' 3/23/22 Ex Parte Application for Interim Stay of Order Granting Plaintiffs' Supplemental Motion for Fees	4/15/22
13	Defendants' 1/14/22 Motion for Leave to File Motion for Reconsideration of Order Granting Plaintiffs' Motion for Instructions to Receiver	3/15/22
14	Defendants 1/18/22 Motion for Leave to file Motion for Reconsideration of Order Granting Plaintiffs' Motion to Stay Special Assessment and Request for Oral Argument	3/15/22
15	Defendants' 1/18/22 Motion for Leave to File Motion for Reconsideration of Order Granting Receiver's Motion for Orders and Instructions and Request for Oral Argument	3/15/22
16	Defendants' 1/18/22 Motion for Leave to File Motion for Reconsideration of Order Approving Receiver's Request to Approve Updated Fees and Request for Oral Argument	3/15/22
17	Defendants' 1/28/2022 Emergency Motion to Stay Enforcement of the Court's Seven Orders Entered January 4, 2022, Pending Hearing and Ruling on Defendants' Motions for Reconsideration and Appeal	2/28/22
18	Receiver's 2/17/22 Request for Submission Regarding "matters addressed in the Briefing submitted by the Receiver and the parties regarding the payment of the fees of the Receiver and his Counsel Ordered by the Court at the Status Conference on February 4, 2022 . . . be submitted for decision."	2/17/22
	<u>MOOT MOTIONS</u>	
19	Defendants' 12/28/21 Motion to Discharge Receiver and Terminate the Receivership MOOT due to Court's January 4, 2022 Orders Divesting Defendants of Authority Over Receivership and Vesting Authority in the Receiver; MOOT based upon January 7, 2015 Order Appointing Receiver and Directing Defendants' Compliance, which requires the Receiver to carry the ultimate Judgment into effect.	2/14/22

20	Defendants' 2/23/22 Motion to Dismiss Pursuant to NRCP 41(e) MOOT due to Court's Granting of Plaintiffs' Findings of Fact, Conclusions of Law, and Order regarding punitive damages.	None
21	Defendants' 11/19/21 Motion for Dismissal of Claims of Deceased Party Plaintiffs Due to Untimely Filing of Notice or Suggestion of Death and Motion to Substitute Party. MOOT due to Court's Granting of Plaintiffs' Findings of Fact, Conclusions of Law, and Order regarding punitive damages.	12/30/21
22	Plaintiffs' October 13, 2021 Motion for Leave to File Motion for Reconsideration of Findings of Fact, Conclusions of Law and Order Granting Defendants' Motion for Reconsideration of 12/24/2020 Order MOOT due to Court's January 4, 2022 Orders: (1) Adopting Receiver's Calculation of Fees; (2) Requiring the Retroactive Application of Fees to January 2020; and (3) Ordering Particular Application of Fees on a Going Forward Basis.	11/12/22
23	Defendants 6/10/21 Emergency Motion to Extend Stay Pending Final Disposition of the Motion to Reconsider. MOOT: <ul style="list-style-type: none"> - Court's January 4, 2022 Order struck the portion of the December 24, 2020 Order requiring the Defendants to disgorge the improper fee allocation charges and specifically ordered Defendants' Motion "denied as moot." - No stay was ever entered and would now be untimely. 	7/01/21
24	Defendants' 1/07/22 Motion for Leave to File Motion for Reconsideration of Order Denying as Moot Defendants' Emergency Motion to Extend Stay Pending Final Disposition of the Motion to Reconsider. MOOT: No stay was ever entered and would now be untimely.	3/10/22
25	Defendants' 10/5/21 Motion for Leave to File Supplemental Objection to Receiver's Analysis and Calculation of Daily Use Fee, Shared Facilities Unit Expense Fees, and For Court to Set Effective Date for New Fees MOOT: Court's January 4, 2022 Order Approved Receiver's Fees	11/08/21
26	Receiver's 10/18/21 Ex Parte Motion for Order Shortening Time for Determination of Receiver's Motion for Orders & Instructions MOOT: Court's January 4, 2022 Order Granted Receiver's Motion for Orders & Instructions.	10/18/21
27	Defendants' 5/21/20 Motion for Instructions to Receiver Regarding Reimbursement of Capital Expenditures MOOT: Court denied relief during October 30, 2019 Motions	7/14/2020

	Hearing.	
28	Plaintiffs' 3/31/21 Motion for Instructions to Receiver to Take Over Control of Rents, Dues, Revenues, and Bank Accounts MOOT: <ul style="list-style-type: none"> - Court's January 4, 2022 Order Granting Receiver's Motion for Orders & Instructions provides Receiver with Control over Rents, Dues, and Bank Accounts. - Court's January 7, 2015 Order Appointing Receiver provides the Receiver the authority to take control of all rental revenue, dues, and bank accounts. 	4/21/21
29	Defendants' 2/12/21 Emergency Motion to Stay Enforcement of December 24, 2020 Order Pending Hearing and Ruling on Motion for Reconsideration MOOT: Temporary stay issued orally by Court at hearing.	3/4/21

III. FLOW CHART

A. *The Receivership Track*

The Court has already noted on the record on March 11, 2022 the importance of the Receiver's resources. (March 11, 2022 Hearing Transcript at 3:4-8.) Accordingly, there are two essential legal reasons why the Court should urgently rule on the Receivership Track Motions in the order the Plaintiffs recommend. First, the Defendants have shut down the Receivership. This is not hyperbole, but fact. On June 6, 2022, the Receiver filed a Notice to the Court and All Parties of Record ("Receiver Notice") that neither the Receiver nor his counsel, Stefanie Sharp, Esq., **will perform any further work . . . until the outstanding amount owed . . . is paid in full and the Receiver and his counsel have assurance of a funding source for work going forward.**" (Ex. 2, Receiver Notice at 1:22-28 (emphasis supplied).) Thus, without Court order or approval, the Defendants have usurped the authority of the Senior Justice and taken unilateral control of the Receiver's functions. This is also not hyperbole, but fact. The Receivership is an arm of the Court, and the record is replete with the Defendants undertaking decisions on their own and completely ignoring Receivership directives that are supported and authorized by Court orders. Indeed, to accomplish this remarkable, yet nefarious feat, the Defendants have violated without consequence the Court's:

- (a) Order Granting Case-Terminating Sanctions;

- (b) January 7, 2015 Order Appointing Receiver (requiring the Receiver to: (a) enforce the Unit Rental Agreements, Unit Maintenance Agreement, and CC&Rs (the “Governing Documents”)); (b) pay Plaintiffs rental revenue they are contractually owed on a monthly basis; (c) take control of the rental revenue and rents of all 670 condominium units; (d) pay the Receivership out of the rental revenue of the 670 Units; and (e) by operation of law, take control of the Unit Rental Program and implementation of the Governing Documents (including the CC&Rs));
- (c) Findings of Fact, Conclusions of Law and Judgment; and
- (d) January 4, 2022 Orders as summarized from the previously submitted briefing below:

4/25/22 Motion for Order to Show Cause (“MOSC”).	Violations: (1) refusal to turn over rental revenue to Receiver; (2) Refusal to Accept Court’s January 4, 2022 approval of Receiver’s fee calculations retroactive to January 2020; (3) Refusal to comply with Court’s January 4, 2022 Order that rental revenue owed to Plaintiffs since January 2020 be paid within thirty (30) days of the order ; (5) unilateral implementation of hyperinflated fees without the Receiver’s approval; and (6) refusal to pay Plaintiffs on a monthly basis as required under the Governing Documents on a moving forward basis from the date of the January 4, 2022 Order.
03/02/22 MOSC	The Court’s January 4, 2022 Order confirmed that the Defendants, their officers, employees, the Declarant, the GSRUOA, its Board of Directors and officers, etc., were divested of authority upon the 2015 appointment of the Receiver. The Defendants violated this order by attempting to terminate the GSRUOA without Receiver approval.
02/01/22 MOSC	Violations: (1) the Defendants unilaterally withdrew millions of dollars in reserve funds without Receiver approval to reimburse themselves for capital contributions; (2) Defendants refused to apply Court-ordered and approved Receiver fee calculations and instead imposed hyperinflated fees and an unauthorized special assessment.
11/19/21 MOSC	Violations: (1) Doubling Contracted Hotel Fees without Receiver Approval; and (2) Increasing the Daily Use Fee without Receiver approval.
09/27/21 MOSC	Violations: (1) Refusal to allow Receiver to take control of rental revenue; (2) Refusal to allow Receiver to pay Plaintiffs monthly revenue they are owed for the use of their units in compliance with the Governing Documents and Order Appointing Receiver; (3) Refusal to allow Receiver to calculate reserves.

Accordingly, the most critical orders that simply must be entered immediately are Receivership Track Motions one (1) through eight (8). The Defendants’ conduct – in shutting down the Receivership – despite that the Plaintiffs prevailed on their cause of action for a

1 Receiver – is simply unprecedented and legally inexcusable. Thus, it cannot be understated how
2 urgent and time-sensitive these rulings are since neither the Plaintiffs nor the Receiver /
3 Receiver’s counsel are being paid what they are owed. Indeed, not only have the Plaintiffs not
4 received a single penny of their \$8 plus million-dollar judgment they were awarded in October of
5 2015, the Plaintiffs have not received a penny of rental revenue since January 2020. The Court
6 should rectify this situation immediately by granting the Plaintiffs’ MOSCs and requiring that
7 the Defendants comply with Court orders (or face harsh contempt orders). The Defendants are
8 already in default and subject to case-terminating sanctions for their abhorrent litigation
9 misconduct, and the record proves they simply will not comply with Court orders that do not
10 advance their objectives – even if it means violating the law.

11 The Court should next adopt the Receiver’s position as taken in Exhibit 1 to the
12 Receiver’s Ex Parte Request for Clarification Regarding Whether Updated Fees Apply to all 670
13 units (“Request for Clarification”); Receivership Track Motion/Request 7). (*See* Ex. 1 to Request
14 for Clarification, explaining the Receiver’s position.) Because the January 7, 2015 Order
15 Appointing Receiver already provides the Receiver with control over the rents, rental revenue
16 and other aspects of the “Property” – which includes all 670 units – this Request for Clarification
17 is actually moot. Regardless, the Court’s clarification to placate the Receiver is necessary to
18 reinstate the Receivership and the Receiver’s authority under the Court’s orders.

19 The Court should also deny each of the Defendants’ motions: (1) requesting
20 reconsideration of this Court’s January 4, 2022 Orders; and (2) motions requesting stays. While
21 the Defendants must comply with the Court’s January 4, 2022 Orders already, **since no stay is in**
22 **place**, these reconsideration motions are meritless as set forth in the briefing. Worse, they simply
23 serve to further ensure that: (1) the Receivership remains shut down; (2) the Defendants can
24 further delay this case;¹ (3) the Receiver / Receiver’s counsel cannot perform their Court-ordered
25

26 ¹ The unprecedented delay and unnecessarily costly and duplicative litigation caused by the Defendants’ litigation
27 abuses was demonstrated in Plaintiffs’ PowerPoint during the Phase Two Hearing, Slide 125. Because the Second
28 Judicial District Court does not mandate, nor usually hold, hearings on motions, the Court should deny Defendants’
hearing requests moving forward. As the extensive record of this case demonstrates, they have delayed the case
enough and made it as unjust and costly as possible.

1 functions and be compensated for their services; (4) the Governing Documents / contracts are not
2 enforced as required under the Court's orders; (5) the Defendants can impose hyperinflated,
3 bogus fees that are not supported by the Governing Documents in order to require the Plaintiffs
4 to subsidize Defendants' revenue-generating operations; and (6) the Plaintiffs continue to be
5 denied rental revenue they have been owed since January 2020 in violation of the contracts and
6 Receivership orders.

7 Thus, the Court should deny Defendant motions twelve (12) through eighteen (18).

8 ***B. The Final, Appealable Judgment Track***

9 The Court has already indicated that it will grant Plaintiffs' Motion in Support of Award
10 for Punitive Damages by adopting Plaintiffs' Findings of Fact, Conclusions of Law, and Order –
11 *subject to certain revisions* (the "FFCLO"). Upon entry of the FFCLO and subsequent order
12 determining the amount of punitive damages, this case will have proceeded to a final, appealable
13 judgment after ten (10) excruciating years. Getting this case to a final judgment is just as
14 important – yet on a separate track from – the Plaintiffs' MOSCs due to the Defendants'
15 inevitable appeal of the FFCLJ (which will further delay this case).

16 ***C. Moot Motions***

17 Plaintiffs believe that the remaining motions, numbers 19-29 have been rendered moot
18 through various Court decisions and orders.

19 **IV. CONCLUSION**

20 For the foregoing reasons, Plaintiffs respectfully request that the Court issue orders on the
21 (1) essential, time-sensitive motions impacting the Receivership, and (2) motions to reach final
22 appealable judgment as promptly as possible so that the Receivership can be put back on track
23 and a final, appealable judgment can be entered.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

AFFIRMATION

Pursuant to NRS § 239B.030, the undersigned does hereby affirm that the preceding document does not contain the social security number of any person.

RESPECTFULLY SUBMITTED this 8th day of August, 2022.

ROBERTSON, JOHNSON,
MILLER & WILLIAMSON
50 West Liberty Street, Suite 600
Reno, Nevada 89501

And

LEMONS, GRUNDY & EISENBERG
6005 Plumas Street, Third Floor
Reno, Nevada 89519

By: /s/ Jonathan J. Tew
Jonathan J. Tew, Esq.
Attorneys for Plaintiffs

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5(b), I hereby certify that I am an employee of Robertson, Johnson,
3 Miller & Williamson, 50 West Liberty Street, Suite 600, Reno, Nevada 89501, over the age of
4 18, and not a party within this action. I further certify that on the 8th day of August, 2022, I
5 electronically filed the foregoing **PLAINTIFFS' MATRIX AND MOTION FOR**
6 **CLARIFICATION** with the Clerk of the Court by using the ECF system which served the
7 following parties electronically:

8 Daniel F. Polsenberg, Esq.
9 Jennifer K. Hostetler, Esq.
10 Dale Kotchka-Alaines, Esq.
11 Lewis Roca Rothgerber Christie, LLP
12 One East Liberty Street Suite 300
13 Reno, NV 89501
14 *Attorneys for Defendants*

F. DeArmond Sharp, Esq.
Stefanie T. Sharp, Esq.
Robison, Sharp Sullivan & Brust
71 Washington Street
Reno, NV 89503
Attorneys for Receiver
Richard M. Teichner

13 Abran Vigil, Esq.
14 Meruelo Group, LLC
15 Legal Services Department
16 5th Floor Executive Offices
17 2535 Las Vegas Boulevard South
18 Las Vegas, NV 89109
19 *Attorneys for Defendants*

David C. McElhinney, Esq.
Meruelo Group, LLC
2500 E. 2nd Street
Reno, NV 89595
Attorney for Defendants

20
21
22
23
24
25
26
27
28

/s/ Stefanie E. Smith
An Employee of Robertson, Johnson, Miller & Williamson

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Index of Exhibits

<u>Number</u>	<u>Description</u>	<u>Pages</u>
1	Plaintiffs’ Proposed Matrix	4
2	Receivership Shutdown Notice	2

EXHIBIT “1”

EXHIBIT “1”

EXHIBIT “1”

CODE: 2040
Jarrad C. Miller, Esq. (NV Bar No. 7093)
Jonathan J. Tew, Esq. (NV Bar No. 11874)
Briana N. Collings, Esq. (NV Bar No. 14694)
Robertson, Johnson, Miller & Williamson
50 West Liberty Street, Suite 600
Reno, Nevada 89501
(775) 329-5600
jarrad@nvlawyers.com
jon@nvlawyers.com
briana@nvlawyers.com

Robert L. Eisenberg, Esq., (NV Bar No. 0950)
Todd R. Alexander, Esq. (NV Bar No. 10846)
Lemons, Grundy & Eisenberg
6005 Plumas Street, Third Floor
Reno, Nevada 89519
Telephone: (775) 786-6868
Facsimile: (775) 786-9716
rle@lge.net
tra@lge.net

Attorneys for Plaintiffs

SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

IN AND FOR THE COUNTY OF WASHOE

ALBERT THOMAS, individually; *et al.*,

Plaintiffs,

vs.

Case No. CV12-02222
Dept. No. OJ37

MEI-GSR Holdings, LLC, a Nevada limited
liability company, GRAND SIERRA
RESORT UNIT OWNERS' ASSOCIATION,
a Nevada nonprofit corporation, GAGE
VILLAGE COMMERCIAL
DEVELOPMENT, LLC, a Nevada limited
liability company; AM-GSR HOLDINGS,
LLC, a Nevada limited liability company; and
DOE DEFENDANTS 1 THROUGH 10,
inclusive,

Defendants.

PLAINTIFFS' MATRIX

Priority Number	<u>Motions and Requests to Be Resolved</u>	Submission Date
1	Plaintiffs' 04/25/22 Motion for Order to Show Cause (Defendants' contempt for violations of Court's orders, including 01/04/22 orders)	5/16/22
2	Plaintiffs' 03/02/22 Motion for Order to Show Cause (Defendants' contempt for violations of Court's orders, including 01/04/22 orders)	4/5/22
3	Plaintiffs' 02/01/22 Motion for Order to Show Cause (Defendants' contempt for violations of Court's orders, including 01/04/22 orders)	2/28/22
4	Plaintiffs' 11/19/21 Motion for Order to Show Cause (Defendants' contempt for violating 01/17/15 Order)	12/23/21
5	Plaintiffs' 09/27/21 Motion for Order to Show Cause (Defendants' contempt for violating 01/17/15 Order)	11/05/21
6	Plaintiffs' 2/11/21 Motion for Order to Show Cause (Defendants' contempt for violating 12/24/22 order)	2/19/21
7	Receiver's 04/22/22 Ex Parte Request for Clarification Regarding Whether Updated Fees Apply to all 670 units	4/22/22
8	Defendants' Motion For Relief From Obligation To Supplement Under NRCPP 26(e)(1) and Motion to Reinstate Attorney-Client Privilege	1/13/22
9	Plaintiffs' 11/16/2015 Motion in Support of Award for Punitive Damages ("Punitive Damages Motion")	
10	Court's Ruling on the Amount of Punitive Damages to be Awarded Will Result in a Final, Appealable Judgment	TBD
	<u>Other Receivership Motions</u>	
11	Defendants' 3/23/22 Ex Parte Application for Interim Stay of Order Granting Plaintiffs' Supplemental Motion for Fees	4/15/22
12	Defendants' 1/14/22 Motion for Leave to File Motion for Reconsideration of Order Granting Plaintiffs' Motion for Instructions to Receiver	3/15/22
13	Defendants 1/18/22 Motion for Leave to file Motion for Reconsideration of Order Granting Plaintiffs' Motion to Stay Special Assessment and Request for Oral Argument	3/15/22
14	Defendants' 1/18/22 Motion for Leave to File Motion for Reconsideration of Order Granting Receiver's Motion for Orders and Instructions and Request for Oral Argument	3/15/22

1			
2	15	Defendants' 1/18/22 Motion for Leave to File Motion for Reconsideration of Order Approving Receiver's Request to Approve Updated Fees and Request for Oral Argument.	3/15/22
3			
4	16	Defendants' 1/28/2022 Emergency Motion to Stay Enforcement of the Court's Seven Orders Entered January 4, 2022, Pending Hearing and Ruling on Defendants Motions for Reconsideration and Appeal.	2/28/22
5			
6	17	Receiver's 2/17/22 Request for Submission Regarding "matters addressed in the Briefing submitted by the Receiver and the parties regarding the payment of the fees of the Receiver and his Counsel Ordered by the Court at the Status Conference on February 4, 2022, in the above-entitled case be submitted to the Court for decision."	2/17/22
7			
8			
9		<u>MOOT MOTIONS</u>	
10	18	Defendants' 12/28/21 Motion to Discharge Receiver and Terminate the Receivership	2/14/22
11			
12	19	Defendants' 2/23/22 Motion to Dismiss Pursuant to NRCP 41(e)	None
13	20	Defendants' 11/19/21 Motion for Dismissal of Claims of Deceased Party Plaintiffs Due to Untimely Filing of Notice or Suggestion of Death and Motion to Substitute Party.	12/30/21
14			
15	21	Plaintiffs' October 13, 2021 Motion for Leave to File Motion for Reconsideration of Findings of Fact, Conclusions of Law and Order Granting Defendants' Motion for Reconsideration of 12/24/2022 Order	11/12/22
16			
17	22	Defendants 6/10/21 Emergency Motion to Extend Stay Pending Final Disposition of the Motion to Reconsider.	7/01/21
18			
19	23	Defendants' 1/07/22 Motion for Leave to File Motion for Reconsideration of Order Denying as Moot Defendants Emergency Motion to Extend Stay Pending Final Disposition of the Motion to Reconsider.	3/10/22
20			
21	24	Defendants' 10/5/21 Motion for Leave to File Supplemental Objection to Receiver's Analysis and Calculation of Daily Use Fee, Shared Facilities Unit Expense Fees, and For Court to Set Effective Date for New Fees	11/08/21
22			
23			
24	25	Receiver's 10/18/21 Ex Parte Motion for Order Shortening Time for Determination of Receiver's Motion for Orders & Instructions	10/18/21
25			
26	26	Defendants' 5/21/20 Motion for Instructions to Receiver Regarding Reimbursement of Capital Expenditures	7/14/2020
27			
28	27	Plaintiffs' 3/31/21 Motion for Instructions to Receiver to Take Over Control of Rents, Dues, Revenues, and Bank Accounts	4/21/21

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

28	Defendants' 2/12/21 Emergency Motion to Stay Enforcement of December 24, 2020 Order Pending Hearing and Ruling on Motion for Reconsideration	3/4/21
----	--	--------

EXHIBIT “2”

EXHIBIT “2”

EXHIBIT “2”

1 CODE: 2610
2 F. DeArmond Sharp, Esq., NSB 780
3 dsharp@rssblaw.com
4 Stefanie T. Sharp, Esq. #8661
5 ssharp@rssblaw.com
6 **ROBISON, SHARP, SULLIVAN & BRUST**
7 71 Washington Street
8 Reno, Nevada 89503
9 Telephone: (775) 329-3151
10 Facsimile: (775) 329-7169
11 *Attorneys for the Receiver for the Grand Sierra*
12 *Resort Unit Owners' Association, Richard M. Teichner*

9 IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

10 IN AND FOR THE COUNTY OF WASHOE

11 Case No.: CV12-02222

12 ALBERT THOMAS, individually; *et al.*,

Dept. No.: OJ37

13 Plaintiff,

14 vs.

15 MEI-GSR Holdings, LLC, a Nevada Limited
16 Liability Company, GRAND SIERRA RESORT
17 UNIT OWNERS' ASSOCIATION, a Nevada
18 nonprofit corporation, GAGE VILLAGE
19 COMMERCIAL DEVELOPMENT, LLC, a
20 Nevada Limited Liability Company; AM-GSR
21 HOLDINGS, LLC, a Nevada Limited Liability
22 Company; and DOE DEFENDANTS 1
23 THROUGH 10, inclusive,
24 Defendants.
25 _____/

22 **NOTICE TO THE COURT AND ALL PARTIES OF RECORD**

23 COMES NOW, Receiver Richard M. Teichner by and through his attorneys, F. DeArmond
24 Sharp, Esq. and Stefanie T. Sharp, Esq., of the law offices of Robison, Sharp, Sullivan & Brust
25 and notifies this Court and the parties hereto that the Receiver and his counsel will not be
26 performing any further work, including but not limited to the filing of monthly reports, until the
27 outstanding amount owed, \$96,252.00, is paid in full and the Receiver and his counsel have
28 assurance of a funding source for work going forward. The statements for the reserve accounts

1 for May 2022, are attached hereto.

2 **AFFIRMATION:** The undersigned does hereby affirm that this document does not
3 contain the Social Security Number of any person.

4 DATED this 6th day of June 2022.

5 ROBISON, SHARP, SULLIVAN & BRUST
6 71 Washington Street
7 Reno, Nevada 89503

8 /s/ Stefanie T. Sharp
9 F. DeARMOND SHARP, ESQ.
10 STEFANIE T. SHARP, ESQ.
11 *Attorneys for the Receiver for the Grand Sierra*
12 *Resort Unit Owners' Association, Richard M.*
13 *Teichner*
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Hon. Elizabeth Gonzalez (Ret.)
Sr. District Court Judge
PO Box 35054
Las Vegas, NV 89133

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE

ALBERT THOMAS, et. al.,

Plaintiff,

vs.

MEI-GSR HOLDINGS, LLC., a Nevada
Limited Liability Company, et al

Defendant.

ORDER

Case#: CV12-02222

Dept. 10 (Senior Judge)

Pursuant to the Administrative Order No. 21-00267 filed on September 19, 2022, the undersigned has been assigned responsibility for this ongoing matter. Given the long history and numerous outstanding motions, it is of assistance to the undersigned for the parties to provide a joint status report prior to any hearings being scheduled. The report should include all relevant history necessary for the undersigned to determine an appropriate course of action for final resolution of this matter. Joint status report to be filed within ten (10) days.

Dated this 29th day September, 2022.



ORDER - 1

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

DALE KOTCHKA-ALANES
DANIEL POLSENBERG, ESQ.
DAVID MCELHINNEY, ESQ.
BRIANA COLLINGS, ESQ.
ABRAN VIGIL, ESQ.
JONATHAN TEW, ESQ.
JARRAD MILLER, ESQ.
TODD ALEXANDER, ESQ.
F. SHARP, ESQ.
STEPHANIE SHARP, ESQ.
G. DAVID ROBERTSON, ESQ.
ROBERT EISENBERG, ESQ.
JENNIFER HOSTETLER, ESQ.

Holly W. Lange

1 CODE NO. 3250

2
3
4
5
6 IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
7 IN AND FOR THE COUNTY OF WASHOE
8

9 ALBERT THOMAS, individually; et al.,

Case No. CV12-02222

10 Plaintiff,

Dept. No. 10

11 vs.

12
13 MEI-GSR Holdings, LLC, a Nevada Limited
14 Liability Company; GRAND SIERRA RESORT
15 UNIT OWNERS' ASSOCIATION, a Nevada
16 nonprofit Corporation; GAGE VILLAGE
17 COMMERCIAL DEVELOPMENT, LLC, a
18 Nevada Limited Liability Company and DOE
19 DEFENDANTS1 THROUGH 10, inclusive,

20 Defendants.
21 _____/

22 **ORDER GRANTING MOTION TO STRIKE**
23 **DEFENDANTS' PEREMPTORY CHALLENGE OF JUDGE**
24

25 Before this Court is the *Motion to Strike Defendants' Peremptory Challenge of Judge*
26 (*"Motion"*), filed by Plaintiffs ALBERT THOMAS, individually; et al. (collectively "Plaintiffs"
27 unless individually referenced), by and through their counsel of record Robertson, Johnson,
28 Miller & Williamson.

29 Defendants, MEI-GSR HOLDINGS, LLC, a Nevada Limited Liability Company; GAGE
30 VILLAGE COMMERCIAL DEVELOPMENT, LLC, a Nevada Limited Liability Company, and
31 AM-GSR HOLDINGS, LLC, a Nevada Limited Liability Company (collectively "Defendants")

1 unless individually referenced), filed *Defendants' Opposition to Plaintiffs' Motion to Strike*
2 *Defendants' Peremptory Challenge* ("Opposition"), by and through their counsel of record
3 Meruelo Group, LLC.

4
5 Plaintiffs filed their *Reply in Support of Motion to Strike Peremptory Challenge*
6 (*Reply*) and the matter was submitted for the Court's consideration.¹

7 **I. RELEVANT FACTUAL AND PROCEDURAL HISTORY.**

8 *Defendants' Peremptory Challenge of Judge* ("Challenge") was filed October 4, 2022,
9 pursuant to Nevada Supreme Court Rule ("SCR") 48.1, and challenges Senior Judge
10 Elizabeth Gonzalez ("Judge Gonzalez"). *Challenge*, p. 1. The *Motion* followed.

11
12 On January 21, 2021, then Chief Judge Scott N. Freeman entered the *Order*
13 *Disqualifying All Judicial Officers of the Second Judicial District Court*. All current judicial
14 officers in the Second Judicial District Court were disqualified from presiding over this
15 matter. On January 29, 2021, Senior Judge William A. Maddox ("Judge Maddox") was
16 assigned to preside over this proceeding by order of the Nevada Supreme Court.
17 *Memorandum of Temporary Assignment Order No. 21-00267*.

18
19 On February 2, 2021, Defendants filed a preemptory challenge of Judge Maddox.
20 *Defendants' Peremptory Challenge of Judge*. On February 19, 2021, the Nevada Supreme
21 Court assigned Senior Justice Nancy M. Saitta, Senior Justice ("Justice Saitta") to preside
22 over this matter. *Memorandum of Temporary Assignment Order No. 21-00267*. Justice
23 Saitta did not file an application to renew her commission. Renewal would have occurred
24 July 1, 2022. SCR 10.

25
26 //

27
28 ¹The undersigned considers the *Motion* and enters this order in her capacity as Chief Judge
of the Second Judicial District Court.

1 On September 19, 2022, the Nevada Supreme Court assigned Senior Judge Elizabeth
2 Gonzalez to preside over this matter. *Supreme Court Administrative Order 21-00267*. The
3 *Challenge* and *Motion* followed.

4
5 **A. MOTION TO STRIKE DEFENDANTS' PEREMPTORY CHALLENGE.**

6 Plaintiffs assert the Court should strike Defendants' *Challenge* as improper because
7 it violates SCR 48.1. *Motion*, p. 3. Plaintiffs maintain each side is entitled to one change of
8 judge by peremptory challenge pursuant to SCR 48.1 and a party(ies) on one side of an
9 action files a peremptory challenge, no other party on the same side may file a separate
10 challenge. Each side has an additional peremptory challenge on reassignment for any
11 reason other than the exercise of a peremptory challenge. In addition, when a senior judge
12 is assigned to a case, a party may exercise one peremptory challenge against a senior
13 judge ("bonus peremptory challenge"). Plaintiffs assert, after the exercise of one senior judge
14 peremptory challenge, no further challenges are allowed. *Motion*, pp. 3-4.

15
16
17 In support of their position Defendants are abusing SCR 48.1, Plaintiffs cite Smith v.
18 Eighth Jud. Dist. Ct., 107 Nev. 674, 678, 818 P.2d 849, 852 (1991) and Nevada Pay TV v.
19 Dist. Ct., 102 Nev. 203, 205, 719 P.2d 797, 798 (1986) and conclude Defendants' February
20 2, 2021, peremptory challenge of Judge Maddox constitutes Defendants' bonus peremptory
21 challenge, leaving them with no further challenges. *Motion*, p. 4.

22
23 **B. DEFENDANTS' OPPOSITION TO PLAINTIFFS' MOTION TO STRIKE.**

24 Defendants maintain they have an additional peremptory challenge due to the
25 reassignment to Judge Gonzalez. *Opposition*, p. 2. Defendants refute Plaintiffs' analysis of
26 SCR 48.1, arguing Plaintiffs' analysis ignores subsection 9's language which addresses the

27
28 //

1 circumstances where a new judge is reassigned to a case replacing the originally assigned
2 judge. *Opposition*, p. 3.

3 Defendants argue:

4
5 [T]he Supreme Court has not assigned, but rather reassigned Senior Judge
6 Gonzalez in place and instead of Justice Saitta. In instances of reassignment
7 SCR 48.1(9) provides:

8 . . .
9 (9) **Notwithstanding the prior exercise of a peremptory challenge**, in the event
10 that the action is **reassigned** for any reason other than the exercise of a
11 peremptory challenge, each side shall be entitled, as a matter of right, to an
12 additional peremptory challenge. (Emphasis added).

13 Id.

14 Defendants assert their Challenge of Judge Gonzalez is timely and allowed by SCR
15 48.1(9) because the plain wording of SCR 48.1 speaks in terms of assignment in the first
16 instance and separately, reassignment in the second. *Opposition*, pp. 3-4.

17 **C. REPLY IN SUPPORT OF MOTION TO STRIKE.**

18 Plaintiffs maintain SCR 48.1 clearly states, once a case is assigned to a senior judge,
19 the parties each may file one senior judge peremptory challenge. Defendants exercised
20 their additional peremptory challenge of Judge Maddox. Defendants cannot now exercise
21 an additional senior judge peremptory challenge. *Reply*, p. 3. Plaintiffs assert Defendants'
22 argument regarding “assignment” versus “reassignment” is a “red herring.” Id.

23 Plaintiffs argue SCR 48.1 specifically forbids more than one peremptory challenge
24 after assignment to a senior judge, citing to SCR 48.1(5) and (8). Plaintiffs argue
25 subsections 5 and 8 explicitly discuss senior judges. Subsection 5 prohibits peremptory
26 challenges against a senior judge assigned by the Supreme Court. Subsection 8 provides
27 an exception to subsection 5, which Plaintiffs argue is the only exception to subsection 5.
28 Plaintiffs argue the subsections discussing senior judges are applicable here. *Reply*, p. 4.

1 Plaintiffs refute Defendants' position subsection 9 allows yet another peremptory
2 challenge to a senior judge beyond those set forth in subsection 8, observing subsection 9
3 does not specify senior judges, and is not mentioned in subsection 5 as an exception.

4 *Reply*, p. 4.

5
6 Plaintiffs argue a court must give effect to the rule drafters' intent by first looking to
7 the plain language of the rule, citing Cty. of Clark v. Sun State Properties, Ltd., 119 Nev.
8 329, 334, 72 P.3d 954, 957 (2003). Plaintiffs also cite In re Nase, 297 B.R. 12, 21 (W.D.
9 Penn. 2003), arguing interpretive cannons dictate a matter not covered is to be treated as
10 intentionally omitted. *Reply*, p. 5. Plaintiffs maintain if the Nevada Supreme Court intended
11 subsection 9 to be an exception to subsection 5, the Court would have included subsection
12 9. It did not. *Reply*, p. 5.

13
14 Plaintiffs contend policy supports Plaintiffs' interpretation because there are only 23
15 senior judges available in Nevada, and Defendants' interpretation would allow unlimited
16 peremptory challenges. *Reply*, pp. 5-6. Plaintiffs further contend the Nevada Supreme
17 Court's order assigning Judge Gonzalez to this matter, rather than reassigning her, belies
18 Defendants' "assigned versus reassigned" argument. *Reply*, p. 6.

19
20 **II. APPLICABLE LAW AND ANALYSIS.**

21
22 **A. Nevada Supreme Court Rule 48.1.**

23 SCR 48.1 provides, in pertinent part:

24 1. In any civil action . . . each side is entitled, as a matter of right, to one
25 change of judge by peremptory challenge. . . If one of two or more parties on
26 one side of an action files a peremptory challenge, no other party on that side
may file a separate challenge.

27 . . .
28 5. . . . Except as otherwise provided in subsection 8, a peremptory challenge
may not be filed . . . against a senior . . . judge assigned by the supreme court
to hear any civil matter

1 . . .

2 8. When a senior judge is appointed to hear a trial or dispositive motion more
3 than 30 days prior to the trial or hearing, a party may follow the procedures in
4 this rule to exercise a peremptory challenge to change the senior judge
5 assigned to the trial or hearing. If a senior judge is assigned to such matter
6 less than 30 days before the matter is to be decided, the parties may not
exercise a peremptory challenge. A party may exercise one peremptory
challenge against a senior judge in addition to the one peremptory challenge
against a judge allowed by subsection 1 of this Rule.

7 9. Notwithstanding the prior exercise of a peremptory challenge, in the event
8 that the action is reassigned for any reason other than the exercise of a
9 peremptory challenge, each side shall be entitled, as a matter of right, to an
additional peremptory challenge.

10 SCR 48.1.

11 Defendants' argument SCR 48.1(9) allows an additional peremptory challenge based
12 upon "reassignment" of the action to Judge Gonzalez as compared to judge "assigned" to
13 this matter is unavailing. First, the order expressly states Judge Gonzalez is assigned to
14 hear this matter. The Court does not use the word "reassign" anywhere in its order.

15 *Supreme Court Administrative Order 21-00267.*

16
17 Next, Defendants' interpretation of SCR 48.1 is contrary to the plain language of the
18 rule. The text of SCR 48.1 clearly distinguishes between "judges" and "senior judges." In
19 subsection 2 the text individually identifies, "district judges, senior justices and judges, and
20 former justices and judges." Subsection 5 individually identifies and creates distinct rules for
21 "any judge" or "senior or pro tempore judge." In subsection 8, every reference to the word
22 "judge" is immediately preceded by and qualified with the title of "senior." An interpretation
23 of SCR 48.1 in which "judge" and "senior judge" are synonymous is contrary to the plain
24 language. The last sentence of subsection 8 expressly provides for peremptory challenges
25 of senior judges, while stating peremptory challenges of judges are governed by subsection
26 1. Absent an explanation of the use of fees in subsection 2, no other subsections of SCR
27
28

1 48.1, including subsection 9, expressly identify senior judges. Thus, subsections 5 and 8
2 govern peremptory challenges of senior judges.

3 The Court applies the rule of construction, *Casus omissus pro omisso habendus est*,
4 a matter not covered is to be treated as not covered.² The Court finds the peremptory
5 challenge provided for in subsection 9 may be exercised against a judge, not a senior judge,
6 after reassignment.
7

8 The Court finds Defendants exercised their peremptory challenge of a senior judge
9 when they preempted Judge Maddox. Subsections 1 and 9 do not apply to senior judges.
10 Thus, the Defendants' *Peremptory Challenge of Judge* should be stricken.
11

12 **III. ORDER.**

13 Accordingly, and good cause appearing therefor,

14 **IT IS HEREBY ORDERED** Plaintiffs' *Motion to Strike Defendants' Peremptory*
15 *Challenge of Judge* is GRANTED. The *Peremptory Challenge of Judge* (Senior Judge
16 Gonzalez) is stricken from the docket. This matter will proceed before Senior Judge
17 Gonzalez.
18

19 DATED this 2nd day of November, 2022.

20 
21 DISTRICT JUDGE
22
23
24
25
26

27 ² [https://definitions.uslegal.com/c/casus-omissus-pro-omisso-habendus-](https://definitions.uslegal.com/c/casus-omissus-pro-omisso-habendus-est/#:~:text=Casus%20Omissus%20Pro%20Omisso%20Habendus%20Est%20is%20a%20Latin%20maxim,to%20have%20been%20omitted%20intentionally)
28 [est/#:~:text=Casus%20Omissus%20Pro%20Omisso%20Habendus%20Est%20is%20a%20Latin%20maxim,to%20have%20been%20omitted%20intentionally](https://definitions.uslegal.com/c/casus-omissus-pro-omisso-habendus-est/#:~:text=Casus%20Omissus%20Pro%20Omisso%20Habendus%20Est%20is%20a%20Latin%20maxim,to%20have%20been%20omitted%20intentionally) (last visited 11/2/2022).

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

DALE KOTCHKA-ALANES
DANIEL POLSENBERG, ESQ.
DAVID MCELHINNEY, ESQ.
BRIANA COLLINGS, ESQ.
ABRAN VIGIL, ESQ.
JONATHAN TEW, ESQ.
JARRAD MILLER, ESQ.
TODD ALEXANDER, ESQ.
F. SHARP, ESQ.
STEPHANIE SHARP, ESQ.
G. DAVID ROBERTSON, ESQ.
ROBERT EISENBERG, ESQ.
JENNIFER HOSTETLER, ESQ.

Holly W. Lange