

JURISDICTION

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2 4. Jurisdiction with this Court is proper pursuant to NRS 4.370 as this action involves an amount
3 in excess of \$10,000.00.

VENUE

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5 5. Venue is proper in the Eighth Judicial District Court pursuant to NRS 13.040.

FACTS COMMON TO ALL CLAIMS

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7 6. Mr. Kennedy is the Managing Member of CSD, LLC.
8 7. CSD is developing the "Wayne Newton's Casa de Shenandoah" project.
9 8. In exchange for a fee, visitors will gain entrance to a museum and other attractions.
10 9. CSD purchased property near Mr. Wayne Newton's property to support the project.
11 10. CSD has purchased business personal property to support the project.
12 11. CSD will purchase shuttle vans to support the project.
13 12. CSD retained design specialists to support and develop the project.
14 13. CSD's business plan anticipates bringing customers by shuttle van to the Newton property.
15 14. Defendant lives in a community down the street from the project.
16 15. Defendant's home, however, does not adjoin the project property and in fact sits inside of a
17 subdivision.
18 16. To minimize negative impacts of its business, and in fact, in an effort to add value to the
19 affected communities, CSD developed plans, which it filed with the City/County, that call for the
20 closing off of Tomiyasu to through traffic.
21 17. On or about early August 2010, and prior to Defendant making the false statements
22 complained of herein, Mr. Kennedy and CSD representatives met with Defendant and showed her
23 CSD's plans.
24 18. At this meeting, CSD explained to Defendant the positive impacts the business would have
25 on the affected communities, including hers.
26 19. Defendant therefore had actual knowledge as to CSD's plans prior to her actions.
27 20. Defendant therefore had knowledge of the existence of actual contractual relations between
28 CSD and third parties prior to her actions.