

EXHIBIT A

NOLESAR LEATHAM

008/031

JIM THOMAS & ASSOCIATES

Investigations & Process Service

601 South Tenth Street, Suite 104

Las Vegas, NV 89101

Telephone (702) 388-7175

Fax (702) 388-7376

August 2, 2006

Jeff Guinn
Aspen Financial Services
7900 W. Sahara Ave., Suite 200
Las Vegas, NV 89117

RE: STEPHEN P. QUINN
Our File No. 06-I-078

Dear Mr. Guinn:

On July 24, 2006 you requested that I complete an asset investigation on Stephen P. Quinn. You provided me with information that Stephen Quinn resides at 350 S. Rancho Dr., Las Vegas, NV; is the owner of Precision Construction, Inc. which is located on Western Avenue in Las Vegas; that he has an unlimited contractor's license; and that his wife's name is Vicky L. Quinn. In addition, you supplied information that you believe he owns a home in Coronado, CA and that it is vested to Coronado Sandpiper Strand LLC. You indicated that he has a boat docked at this home which he paid between \$200,000 and \$250,000 for. You indicated that he uses this boat to go to Mexico on numerous occasions.

In preparing this report, I accessed information from the Clark County Assessor, San Diego County Assessor, Clark County Recorder, Clark County Marriage License Index, Clark County Voter Registration, Clark County Clerk, Clark County Business License Division, City of Las Vegas Business License Division, City of North Las Vegas Business License Division, Henderson Business License Division, Nevada State Contractors Board, Nevada Secretary of State, California Secretary of State, Business Credit USA, Las Vegas Metropolitan Police Department, Nevada Department of Motor Vehicles, Nevada Department of Wildlife, Clark County District Court, Clark County Family Court, United States Criminal Court, United States Civil Court, United States Court of Appeals, and the United States Bankruptcy Court. In addition, I obtained information from the databases CDB Infotek, Faces of the Nation and Accurint.

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PERSONAL INFORMATION

Name:	Stephen Paul Quinn
Date of Birth:	[REDACTED]
Social Security Number:	[REDACTED] was issued in the State of New York between 1962 and 1963
Residence Address:	350 S. Rancho Dr. Las Vegas, NV 89106-4801
Residence 2:	25 Sandpiper Strand Coronado, CA 92118
Las Vegas Telephone Number:	(702) 870-9696
Coronado Telephone Number:	(619) 423-8040
Spouse's Name:	Victoria Lynn Quinn
Also Known As:	Victoria Lynn Steward
Spouse's Date of Birth:	May 14, 1959
Spouse's Social Security Number:	[REDACTED] was issued in the State of Nevada

PRIOR ADDRESSES

2319 Western, #A
Las Vegas, NV 89108

1821 Griffith Ave.
Las Vegas, NV 89104

2216 Beverly Way
Las Vegas, NV 89104

CLARK COUNTY ASSESSOR

An inquiry with the Clark County Assessor's Office revealed two pieces of real property owned by Stephen P. and Victoria L. Quinn. They are:

Item 1	
Parcel Number:	139-32-601-049
Owner:	Quinn, Stephen and Victoria Family Trust Quinn, Stephen P. and Victoria L. - Trustees

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Mailing Address: 2319 Western, #A
 Las Vegas, NV 89102-4827
 Location Address: 350 S. Rancho Dr.
 Las Vegas, NV 89102
 Assessor Description: PT:SE4 NE4 SEC 32 20 61
 Recorded Document Number: 20020709:00984
 Recorded Date: July 9, 2002

REAL PROPERTY ASSESSED VALUE

Fiscal Year: 2006-2007
 Land: \$91,000
 Improvements: \$51,383
 Gross Assessed: \$142,383
 Taxable Value Land and Improvements: \$406,809

Description: This one-story residence consists of 3,652 square feet with a 708 square foot garage. There are four bedrooms, four full baths and one fireplace. The home, which is of frame stucco construction with a concrete tile roof, was originally constructed in 1964. It sits on a lot size estimated at 0.93 acres. The assessor map number is 139326. The last sale price for this residence in January 1991 was \$280,000.

Item 2
 Parcel Number: 162-04-711-003
 Owner: Quinn Family Trust
 Quinn, Stephen P. and Victoria L. -
 Trustees
 Mailing Address: 1821 Western Ave.
 Las Vegas, NV 89102-4615
 Location Address: City/Township is given as Las Vegas
 Assessor Description: Western Flex Warehouse Plat Book
 126 Page 31 PT Lot 1
 Recorded Document Number: 20060330:00526
 Recorded Date: March 30, 2006

REAL PROPERTY ASSESSED VALUE

Fiscal Year: 2006-2007
 Land: \$65,864
 Improvements: \$0

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Gross Assessed: \$65,864
 Taxable Value Land and Improvements: \$188,183

Description: This is vacant land estimated at 0.36 acres. The last sale price dated March 2006 is \$1,285,000. The assessor's map number is 162047.

SAN DIEGO COUNTY ASSESSOR

We attempted to obtain information for the residence at 25 Sandpiper Strand, Coronado, CA 92118. The parcel number is given as 615-082-1600. The property is vested to Coronado Sandpiper Strand LLC at 2319 Western Ave., Suite A, Las Vegas, NV 89102-4827. The only additional information is that the home was built in 1976. We were unable to find any other specific information regarding this property. We did determine that it is in a very affluent neighborhood. We found information regarding two other properties, the first of which is at 41 Sandpiper Strand, parcel number 615 082 25 00. This is a 3,767 square foot four bedroom home that last sold for \$2,700,000 in August 2005. The second nearby location is at 45 Sandpiper Strand, parcel number 615 082 06 00, which is a 2,358 square foot three bedroom home that last sold for \$1,700,000 in August 2005. The San Diego Assessor's Office would provide no information over the phone stating that we would have to come to their counter to look the property up. We did find information through the 2000 census regarding the neighborhood profile for this area. The census figures show that the median home value is \$720,000. It also shows that the median average age is 67 and that the median household income is \$82,179.

CLARK COUNTY RECORDER

An inquiry with the Clark County Recorder's Office 34 recorded documents for Stephen Quinn. They are:

Item 1	
Instrument:	20060420-04000
Document Type:	Assignment
Date Recorded:	April 20, 2006 at 13:51:58
Remarks:	Assignment of Deed of Trust
Requestor:	Aspen Financial LLC
First Party:	Quinn, Paul
	Quinn, Stephen
Second Party:	Aspen Financial Services LLC
Third Party:	Coronado South LLC Limited Liability Company
Legal Description:	Parcel Number 1603341001

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Item 2
Instrument: 20060330-00528
Document Type: Assignment
Date Recorded: March 30, 2006 at 09:01:31
Remarks: Assignment of Rents
Requestor: Nevada Title Company
First Party: Quinn, Stephen P. EE
Quinn, Victoria Lynn EE
Stephen P. and Victoria Lynn Quinn
Family Trust
Second Party: Colonial Bank NA
Legal Description: Parcel Number 162-04-711-001

Item 3
Instrument: 20060308-02219
Document Type: Assignment
Date Recorded: March 8, 2006 at 14:16:12
Remarks: Assignment of Deed of Trust
Requestor: Aspen Financial LLC
First Party: Quinn, Paul
Quinn, Stephen
Second Party: Aspen Financial Services LLC
Third Party: Flamingo TC-LLC
Legal Description: Parcel Number 164-13-401-004

Item 4
Instrument Number: 20050915-02923
Document Type: Assignment
Date Recorded: September 15, 2005 at 12:36:03
Remarks: Assignment of Deed of Trust
Requestor: Aspen Financial Services LLC
First Party: Quinn, Paul
Second Party: Quinn, Paul
Quinn, Stephen
Third Party: Coronado South LLC Limited
Liability Company
Legal Description: Parcel Number 160-33-410-001

Item 5
Instrument: 20050620-03565
Document Type: Deed
Date Recorded: June 20, 2005 at 14:04:42

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Requestor: Fidelity National Title
First Party: Quinn, Stephen P.
Second Party: Quinn, Victoria L.
Legal Description: Parcel Number 162-02-810-035

Item 6
Instrument: 20020709-00984
Document Type: Deed
Date Recorded: July 9, 2002 at 10:16:42
Remarks: Re-recorded
Requestor: S. Quinn
First Party: Quinn, Stephen P.
Quinn, Victoria L.
Second Party: Quinn, Stephen P. - EE
Quinn, Victoria L. - EE
Stephen P. and Victoria Lynn Quinn
F - Trust
Legal Description: Parcel Number 139-32-601-049

Item 7
Instrument: 20020604-01835
Document Type: Homestead
Date Recorded: June 4, 2002 at 14:28:06
Requestor: Leavitt Sully et al.
First Party: Quinn, Stephen P.
Quinn, Victoria L.
Quinn, Stephen P. - EE
Quinn, Victoria L. - EE
Stephen P. and Victoria Lynn Quinn
F - Trust
Second Party: To Whom It May Concern
Legal Description: Parcel Number 139-32-601-049

Item 8
Instrument: 20020604-01834
Document Type: Deed
Date Recorded: June 4, 2002 at 14:28:06
Requestor: Leavitt Sully et al.
First Party: Quinn, Stephen P.
Quinn, Victoria L.

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Second Party: Quinn, Stephen P. - EE
Quinn, Victoria L. - EE
Stephen P. and Victoria Lynn Quinn
F - Trust
Legal Description: Parcel Number 139-32-601-049

Item 9
Instrument: 20020604-01833
Document Type: Trust - Amend
Date Recorded: June 4, 2002 at 14:28:00
Requestor: Leavitt Sully et al.
First Party: Quinn, Stephen P.
Quinn, Victoria Lynn
Stephen P. and Victoria Lynn Quinn
F - Trust
Quinn Family Trust
Quinn Survivor's Trust
Quinn Offset Trust
Second Party: None Shown
Third Party: Sartini, Delise
Quinn, Eleanor
Quinn, Paul Alexander
Quinn, Stephen Cameron
Quinn, Madeline

Item 10
Instrument: 20020529-01279
Document Type: Lien - Release
Date Recorded: May 29, 2002 at 10:40:22
Requestor: Precision Construction Inc.
First Party: Quinn, Stephen P.
Second Party: Anaya, Joseph A.
Anaya, Teresa L.
Legal Description: Parcel Number 176-24-101-013

Item 11
Instrument: 20020211-00320
Document Type: Power of Attorney
Date Recorded: February 11, 2002 at 08:28:20
Requestor: Aspen Financial Services Inc.

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<p>First Party:</p>	<p>Quinn, Stephen P. - EE Quinn, Victoria L. - EE Stephen P. and Victoria L. Quinn Family Trust</p>
<p>Second Party: Legal Description:</p>	<p>Quinn, Victoria L. Aspen Financial Services, Inc. Parcel Number 177-08-601-001</p>
<p>Item 12</p>	
<p>Instrument: Document Type: Date Recorded: Requestor: First Party:</p>	<p>20020211-00314 Power of Attorney February 11, 2002 at 08:28:20 Aspen Financial Services Inc. Quinn, Stephen P. - CSTDN Quinn, Stephen C. Quinn, Stephen P.</p>
<p>Second Party: Legal Description:</p>	<p>Aspen Financial Services Inc. Parcel Number 177-08-601-001</p>
<p>Item 13</p>	
<p>Instrument: Document Type: Date Recorded: Requestor: First Party:</p>	<p>20020205-00574 Power of Attorney February 5, 2002 at 09:08:02 Aspen Financial Services LLC Quinn, Stephen P. - CSTDN Unvutma, Paul Quinn</p>
<p>Second Party: Legal Description:</p>	<p>Aspen Financial Services LLC Parcel Number 177-08-601-001</p>
<p>Item 14</p>	
<p>Instrument: Document Type: Date Recorded: Requestor: First Party: Second Party:</p>	<p>20020205-00498 Trust Deed - Assign February 5, 2002 at 09:08:02 Aspen Financial Services LLC Aspen Financial Services LLC Quinn, Stephen P. - CSTDN Unvutma, Paul Quinn Quinn, Stephen P. - CSTDN Unvutma, Stephen C. Quinn Quinn, Victoria L. - CSTDN Unvutma, Madeline Quinn Quinn, Stephen P. - EE</p>

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Third Party: Quinn, Victoria L. - EE
Legal Description: Stephen P. and Victoria L. Quinn
Family Trust
Desert Land LLC
Parcel Number 177-08-601-001

Item 15
Instrument: 20020124-02095
Document Type: Trust Deed
Date Recorded: January 24, 2002 at 14:21:24
Requestor: Nevada Title Company
First Party: Desert Land LLC
Second Party: 28 subjects including Quinn, Stephen
P. - CSTDN; Unvutma, Paul Quinn;
and Aspen Financial Services LLC
Legal Description: Parcel Number 177-08-601-001

Item 16
Instrument: 20010323-02502
Document Type: Notice - Completion
Date Recorded: March 23, 2001 at 15:29:47
Requestor: Precision Construction Inc.
First Party: Quinn, Stephen P.
Coronado Bay Buffalo LLC
Second Party: Precision Construction Inc.
Legal Description: Parcel Number 163-04-806-010
Address: 2451 S. Buffalo Dr., Suite 145

Item 17
Instrument: 20001206-01370
Document Type: Trust Deed
Date Recorded: December 6, 2000 at 14:25:00
Requestor: Nevada Title Company
First Party: Aspen Self Storage LLC
Second Party: 51 subjects including Quinn, Stephen
P. - CSTDN; Unvutma, Stephen C.
Quinn; Quinn, Victoria L. - CSTDN;
Unvutma, Madeline Quinn; Quinn,
Stephen C.; and Quinn, Madeline
Legal Description: Parcel Number 163-13-504-003

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Item 18
Instrument: 20001020-01766
Document Type: Agreement
Date Recorded: October 20, 2000 at 14:52:43
Requestor: Aspen Financial Services Inc.
First Party: Aspen Financial Services Inc.
Second Party: Quinn, Stephen P. - CSTDN
Stephen, C. Quinn Unvutma
Legal Description: Parcel Number 161-34-610-002

Item 19
Instrument: 20001020-01765
Document Type: Agreement
Date Recorded: October 20, 2000 at 14:52:43
Requestor: Aspen Financial Services Inc.
First Party: Aspen Financial Services Inc.
Second Party: Quinn, Stephen P.
Legal Description: Parcel Number 161-34-610-002

Item 20
Instrument: 20000530-00670
Document Type: Trust Deed - Partial Assignment
Date Recorded: May 30, 2000 at 08:43:43
Requestor: Land Title of Nevada
First Party: Aspen Financial Services Inc.
Second Party: Quinn, Stephen P. - CSTDN
Unvutma, Paul Quinn
Unvutma, Stephen C. Quinn
Quinn, Victoria L. - CSTDN
Unvutma, Madeline Quinn
Third Party: Boulder MD LLC
Legal Description: Parcel Number 161-34-610-002
Parcel Number 161-34-610-003
Parcel Number 161-34-610-004
Parcel Number 161-34-610-005

Item 21
Instrument: 19990608-01581
Document Type: Lien - Other
Date Recorded: June 8, 1999 at 15:31:25
Requestor: United Title of Nevada

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First Party: Quinn, Stephen P.
Second Party: None Shown

Item 22
Instrument: 19980409-01090
Document Type: Substitution/Reconveyance
Date Recorded: April 9, 1998 at 12:30:51
Requestor: NationsBank
Second Party: Stan-Shaw Corporation
NationsBanc Mortgage Corporation
NationsBanc Mortgage Corporation
Third Party: Quinn, Stephen P.
Quinn, Victoria L.

Item 23
Instrument: 19971203-00796
Document Type: Trust - Amend
Date Recorded: December 3, 1997 at 12:17:35
Requestor: Leavitt Sully et al.
First Party: Quinn, Stephen P.
Quinn, Victoria Lynn
Stephen P. and Victoria Lynn Quinn
F - Trust
Second Party: Quinn, Stephen P.
Quinn, Victoria Lynn
Third Party: Quinn, Eleanor
Main, Jim
Quinn, Catherine

Item 24
Instrument: 19960220-00593
Document Type: Trust Deed - Assign
Date Recorded: February 20, 1996 at 12:41:50
Requestor: First American Real Estate
Information
First Party: Express America Mortgage
Corporation
Second Party: NationsBanc Mortgage Corporation
Third Party: Quinn, Stephen P.
Quinn, Victoria L.

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Item 25
Instrument: 19941207-01288
Document Type: Notice - Completion
Date Recorded: December 7, 1994 at 14:05:08
Requestor: Precision Construction
First Party: Keyser-Co LP
Quinn, S. P.
Quinn, Stephen P.
Second Party: Precision Construction Inc.
Legal Description: 2416 W. Desert Inn Rd.

Item 26
Instrument: 19940610-00079
Document Type: Deed
Date Recorded: June 10, 1994 at 08:00:00
Requestor: Nevada Title Company
First Party: Algier's Inc.
Second Party: Quinn, Stephen P.
Quinn, Victoria L.
Legal Description: Parcel Number 139-32-601-024
Total Value: \$12,688

Item 27
Instrument: 19940314-01006
Document Type: Trust - Cert Amend
Date Recorded: March 14, 1994 at 16:37:19
Requestor: Sully & Associates
First Party: Quinn, Stephen P.
Quinn, Victoria Lynn
Stephen P. and Victoria Lynn Quinn
F - Trust
Quinn Family Trust
Quinn Survivor's Trust
Quinn Credit Offset Trust
Second Party: Quinn, Stephen P.
Quinn, Victoria Lynn
Third Party: Quinn, Eleanor
Main, Jim
Quinn, Catherine

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Item 28
Instrument: 19930420-00687
Document Type: Reconveyance
Date Recorded: April 20, 1993 at 08:00:00
Requestor: Nevada Title Company
First Party: Home Trustee Inc.
Second Party: Quinn, Stephen P.
Quinn, Victoria L.

Item 29
Instrument: 19921013-00259
Document Type: Trust Deed
Date Recorded: October 13, 1992 at 08:00:00
Requestor: Nevada Title Company
First Party: Quinn, Stephen P.
Quinn, Victoria L.
Second Party: Directors Mortgage Loan
Corporation

Item 30
Instrument: 19910711-00280
Document Type: Reconveyance
Date Recorded: July 11, 1991 at 08:00:00
Requestor: Stewart Title of NV
First Party: Home Trustee Inc.
Second Party: Quinn, Stephen P.

Item 31
Instrument: 19910424-00037
Document Type: Deed
Date Recorded: April 24, 1991 at 08:00:00
Requestor: Stewart Title of NV
First Party: Quinn, Stephen P.
Quinn, Victoria L.
Second Party: Vertucci, Domenic Louis
Legal Description: Parcel Number 050253009
Total Value: \$112,800

Item 32
Instrument: 19910110-00020
Document Type: Trust Deed
Date Recorded: January 10, 1991 at 08:00:00

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Requestor: Stewart Title of NV
 First Party: Quinn, Stephen P.
 Quinn, Victoria L.
 Second Party: Primerit Bank FSB

Item 33
 Instrument: 19910110-00019
 Document Type: Deed
 Date Recorded: January 10, 1991 at 08:00:00
 Requestor: Stewart Title of NV
 First Party: Weber, Steven A.
 Weber, Robbie Ann
 Second Party: Quinn, Stephen P.
 Quinn, Victoria L.
 Legal Description: Parcel Number 030260020
 Total Value: \$280,000

Item 34
 Instrument: 19900510-00825
 Document Type: Trust
 Date Recorded: May 10, 1990 at 12:21:33
 Requestor: W. Leslie Sully, Jr., Chtd.
 First Party: Stephen P. and Victoria Lynn Quinn
 - Trust
 Quinn Family Trust
 Quinn, Stephen P.
 Quinn, Victoria Lynn
 Second Party: Quinn, Stephen P.
 Third Party: Quinn, Eleanor
 Stewart, Mark
 Quinn, Peter
 Quinn Survivors Trust
 Quinn Credit Offset Trust

CLARK COUNTY MARRIAGE LICENSE INDEX

An inquiry with the Clark County Recorder's Marriage License Index shows that Stephen P. Quinn married Victoria Lynn Steward on June 14, 1986 in Clark County, NV. The certificate number is B624719.

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CLARK COUNTY VOTER REGISTRATION

An inquiry with the Clark County Election Department revealed that Stephen P. Quinn is registered voter ID [REDACTED]. He votes in Precinct 4325 and lists his party as Non-Partisan. His birth date is confirmed as [REDACTED]. His registration address is 350 S. Rancho Dr., Las Vegas, NV 89106. He votes at First Christian Church which is located at 101 S. Rancho Dr., Las Vegas, NV 89106.

UNIFORM COMMERCIAL CODES

Examination of all available public records as well as inquiries through the databases CDB Infotek, Faces of the Nation and Accurint failed to locate any UCC filings in the Stephen P. Quinn's name.

CLARK COUNTY CLERK

An inquiry with the Clark County Clerk's Office revealed that Stephen P. Quinn has no fictitious business names filed. We also checked the business name and did find that the name Precision Construction, Inc. is an active fictitious business name that expires January 31, 2008. The file number is 0298329. The individual/corporation name is Precision Construction, Inc. and the business address is 2319 Western Ave., Suite A, Las Vegas, NV 89102.

CLARK COUNTY BUSINESS LICENSE

An inquiry with the Clark County Business License Division revealed no business licenses issued to Stephen P. Quinn.

LAS VEGAS BUSINESS LICENSE

An inquiry with the City of Las Vegas Business License Division revealed that Stephen P. Quinn holds license number C11-01593 as the owner of Precision Construction, Inc. This business is located at 1821 Western Ave. and their business telephone number is listed as (702) 387-2077. This license was first issued July 5, 2006 and its status is active. Stephen P. Quinn is listed both as the 100 percent owner and president.

NORTH LAS VEGAS BUSINESS LICENSE

An inquiry with the City of North Las Vegas Business License Division revealed no business licenses issued to Stephen P. Quinn.

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HENDERSON BUSINESS LICENSE

An inquiry with the City of Henderson Business License Division revealed no licenses issued to Stephen P. Quinn.

NEVADA STATE CONTRACTORS BOARD

An inquiry with the Nevada State Contractors Board determined that Stephen P. Quinn holds two contractor's licenses. Information regarding those licenses is:

Item 1	
License Number:	0021231
Business Name:	Precision Construction, Inc.
Business Address:	1821 Western Ave. Las Vegas, NV 89102
Phone Number:	(702) 387-2077
Status:	Active
Status Date:	September 9, 1997
Origin Date:	September 14, 1983
Expiration Date:	September 30, 2006
Business Type:	Corporation
Classification:	B - General Building
Principal Name:	Quinn, Stephen Paul - President Qualified Individual Olewinski, Elliot Raymond - Qualified Individual Fenich, James Darwin - Qualified Individual
Bond Type:	Surety Bond
Bond Requirement:	No Bond Required
Effective Date:	September 9, 1997

Item 2	
License Number:	0037692
Business Name:	Precision Construction, Inc.
Business Address:	1821 Western Ave. Las Vegas, NV 89102
Phone Number:	(702) 387-2077
Status:	Active
Status Date:	February 3, 2005
Origin Date:	March 2, 1995
Expiration Date:	March 31, 2007

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Business Type:	Corporation
Classification:	A - General Engineering
Principal Name:	Quinn, Stephen Paul - President
	Qualified Individual
Bond Type:	Surety Bond
Bond Requirement:	No Bond Required
Effective Date:	May 7, 2002

NEVADA SECRETARY OF STATE

An inquiry with the Nevada Secretary of State identified four separate corporations or limited liability companies in which Stephen P. Quinn is an officer or member. They are:

Item 1	
Name:	Coronado Sandpiper Strand, LLC
Corporation Number:	LLC1826-1999
Type:	Domestic Limited-Liability Co.
File Date:	March 18, 1999
Status:	Active
Expiration Date:	March 18, 2499
Resident Agent:	W. Leslie Sully, Jr., Chtd. 601 E. Bridger Ave. Las Vegas, NV 89101
Managing Member:	Madeline Quinn 350 S. Rancho Dr. Las Vegas, NV 89106
Managing Member:	Paul Quinn 350 S. Rancho Dr. Las Vegas, NV 89106
Managing Member:	Stephen P. Quinn 350 S. Rancho Dr. Las Vegas, NV 89106
Managing Member:	Stephen C. Quinn 350 S. Rancho Dr. Las Vegas, NV 89106
Managing Member:	Victoria L. Quinn 350 S. Rancho Dr. Las Vegas, NV 89106
Financial Information:	No stock records found for this company

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Item 2
Name: Precision Construction, Inc.
Corporation Number: C2843-1983
File Date: May 4, 1983
Type: Domestic Corporation
Status: Active
Resident Agent: Elliot R. Olewinski
9325 Valencia Canyon Dr.
Las Vegas, NV 89117
President: Stephen P. Quinn
350 S. Rancho Dr.
Las Vegas, NV 89102
Secretary: Stephen P. Quinn
350 S. Rancho Dr.
Las Vegas, NV 89102
Treasurer: Stephen P. Quinn
350 S. Rancho Dr.
Las Vegas, NV 89102
Financial Information: No stock records found for this company

Item 3
Name: Sandpiper Strand-Las Vegas, LLC
Corporation Number: LLC24786-2004
File Date: October 21, 2004
Status: Active
Expiration Date: October 21, 2504
Resident Agent: Dennis M. Prince
3230 S. Buffalo Dr., Suite 108
Las Vegas, NV 89117
Managing Member: Stephen P. Quinn
3230 S. Rancho Dr.
Las Vegas, NV 89106
Financial Information: No stock records found for this company

Item 4
Name: Western Flex Warehouse Owners' Association, Inc.
Corporation Number: E0702612005-1
File Date: October 17, 2005 at 3:09 PM
Type: Domestic Non-Profit Corporation

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Status:	Active
Resident Agent:	Douglas R. Malan 720 S. Fourth St., Suite 30 Las Vegas, NV 89101
President:	Stephen P. Quinn 2319 Western Ave., Suite A Las Vegas, NV 89102
Secretary:	Victoria L. Quinn 2319 Western Ave., Suite A Las Vegas, NV 89102
Treasurer:	Elliot Olewinski 2319 Western Ave., Suite A Las Vegas, NV 89102
Financial Information:	No stock records found for this company

CALIFORNIA SECRETARY OF STATE

An inquiry with the California Secretary of State failed to identify any corporations or limited partnerships in which Stephen P. Quinn is an officer or member.

BUSINESS CREDIT USA

Business Credit USA is a database I subscribe to that holds records on over 14 million businesses in the United States. An inquiry with Business Credit USA found one business listed to S. P. Quinn. Information regarding that company is:

Name:	Precision Construction
Address:	2319 Western Ave., #A Las Vegas, NV 89102-4882
Phone:	(702) 387-2077
Fax:	(702) 387-6792
Contact:	S. P. Quinn, President
Employees:	10 to 19
Estimated Sales/Assets:	\$2.5 to \$5 million
Credit Rating Score:	93 (A)
InfoUSA ID:	[REDACTED]
Years in Database:	15 plus
NAICS Code:	23622005

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NAICS Description:	Commercial Building Construction
Primary Line of Business:	Building Contractors
Secondary Line of Business:	General Contractors - Industrial Buildings and Warehouse

LAS VEGAS METROPOLITAN POLICE DEPARTMENT

An inquiry with the Las Vegas Metropolitan Police Department determined that Stephen Paul Quinn is their ID number [REDACTED]. His date of birth is given as [REDACTED] and his birthplace as New York, NY. He is described as a white male, 5'11" tall, 235 pounds with gray hair and hazel eyes. His social security number is [REDACTED]. He has no previous through the FBI. His home address is given as 350 S. Rancho Dr., Las Vegas, NV 89106. He has no arrest record. He has two handguns registered to him. The first is a Browning Hipower 9mm. The permit number is [REDACTED]. The serial number on the handgun is not given. The second weapon is a .45 caliber Colt Government semiautomatic. It is listed under the same permit number [REDACTED] and the serial number is not given.

The Las Vegas Metropolitan Police Department indicates that Quinn has been involved in three traffic collisions. The first occurred on December 14, 1999 at his residence address of 350 S. Rancho under event number 991214-1419. The second accident occurred December 16, 1992 at Western and Highland under event number 921216-0686. The third traffic accident occurred on June 9, 1992 at State Route 146 and Water Street in Henderson under Henderson Police Department DR number 92-5638.

NEVADA DEPARTMENT OF MOTOR VEHICLES

An inquiry with the Nevada Department of Motor Vehicles revealed that Stephen P. Quinn holds Nevada driver's license [REDACTED]. He is described as a white male, 5'11" tall, 245 pounds with gray hair and hazel eyes. His date of birth is given as [REDACTED] and his social security number as [REDACTED]. His physical address and mailing address are both 350 S. Rancho, Las Vegas, NV 89106. This license is a Class C license that expires on December 31, 2008. There are no endorsements or restrictions. Quinn also holds a Class M license that expires the same date, December 31, 2008, with no endorsements or restrictions.

DMV lists two vehicles registered to Stephen P. Quinn. The first is a 2002 Chevrolet four-door wagon which bears Nevada license [REDACTED]. The second is a 2001 GMC truck which bears Nevada license [REDACTED].

Quinn's vehicle insurance is through Safeco Insurance Company of Illinois, policy number [REDACTED]. The effective date of this coverage was January 6, 2005.

JT00020

Jeff Guinn
August 2, 2006
Page 21

Under the driver history summary, the record shows no convictions, no withdrawals, one traffic school and no traffic accidents. Quinn completed traffic safety school on November 7, 1989. Note the difference in the number of accidents under the Department of Motor Vehicles and that listed through the Las Vegas Metropolitan Police Department differs because DMV takes accidents off the record after three years.

NEVADA DEPARTMENT OF WILDLIFE

Information obtained through the database Faces of the Nation as well as a source at the Nevada Department of Wildlife revealed three separate watercraft registered to Stephen P. Quinn. They are:

Item 1

A 1999 35.5' yacht carrying the vessel name *Mai Time*. This fiberglass boat was manufactured by S2 Yachts, Inc. of Holland, MI. The US Coast Guard document number is [REDACTED]. The hull number is [REDACTED]. As stated, the length is 35.5'. The hull depth is 6'. The hull breadth is 13.2'. The gross tonnage is 19 and the net tonnage is 15. The owner is listed as Stephen P. Quinn as Trustee of the Stephen P. Quinn Trust dated November 25, 1997. His address is given as 2319 Western Ave., Suite A, Las Vegas, NV 89102. The documentation issuance date was February 15, 2006. The hailing port as listed by the US Coast Guard is Las Vegas, NV. This vessel previously held the name *Diadema* when it was owned by its previous owner, Walter M. Poulson.

Item 2

A 1995 Bombardier jet ski. The hull ID number is [REDACTED]. The Nevada registration number is [REDACTED]. The length of this jet ski is 9'11". It is registered to Stephen or Victoria Quinn at 350 S. Rancho Rd., Las Vegas, NV 89106.

Item 3

A 1992 Bombardier, hull ID number [REDACTED]. The registration number is [REDACTED]. This is an 8' jet ski registered to Stephen or Victoria Quinn at 350 S. Rancho Rd., Las Vegas, NV 89106.

CLARK COUNTY DISTRICT COURT

An inquiry with the Clark County District Court found five cases, only one of which is still active, for Stephen P. Quinn. They are from newest to oldest:

JT00021

09/10/2009 10:30 AM 102 582 1281

RULESAM LEATHAM

021/031

Jeff Guinn
August 2, 2006
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Item 1

Case Number:	06-A-519586-C
File Date:	March 29, 2006
Plaintiff(s):	Precision Construction, Inc. Stephen P. Quinn
Plaintiff Attorney:	Bruce A. Brown
Defendant(s):	Jeffrey Guinn Kent Barry Coronado Eastern LLC Coronado Investments LLC
Defendant Attorney:	Bruce N. Willoughby
Counter-Claimant(s):	Coronado Eastern LLC Coronado Investments LLC
Counter-Defendant(s):	Precision Construction, Inc. Stephen P. Quinn
Judge:	Valerie J. Vega
Department:	2
Status:	Active

Item 2

Case Number:	01-A-438012-M
File Date:	July 31, 2001
Plaintiff(s):	Stephen P. Quinn
Subject Minor:	Paul Quinn
Plaintiff Attorney:	Patti S. Wise
Defendant(s):	Kelly J. Vandever State Farm Insurance Company Travelers Property & Casualty Stephen Huffaker
Judge:	VJ35
Department:	
Status:	Closed as of February 11, 2002
Judgment:	\$15,000.

Item 3

Case Number:	00-A-425018-M
File Date:	October 2, 2000
Plaintiff(s):	Stephen P. Quinn
Subject Minor:	Stephen C. Quinn
Plaintiff Attorney:	Robert L. Hempen
Defendant(s):	Kelly J. Vandever State Farm Insurance Company

JT00022

Jeff Guinn
August 2, 2006
Page 23

Judge: Michael A. Cherry
Department: 17
Status: Closed as of October 19, 2001
Judgment: \$20,000 for plaintiff

Item 4
Case Number: 98-A-385184-C
File Date: March 2, 1998
Plaintiff(s): John W. Grayson
John J. Bongiovi, Jr.
Stephen P. Quinn
Victoria L. Quinn
Donald W. Petit
Sharon R. Petit
Plaintiff Attorney: Larry C. Johns
Defendant(s): Rancho Cooperative Water Co.
Avis Rent-A-Car Systems, Inc.

Defendant Attorney: William H. Stoddard
Judge: Stephen Huffaker
Department: VJ35
Status: Closed as of February 8, 1999
Outcome: Matter Settled

Item 5
Case Number: 93-A-327334-C
File Date: November 12, 1993
Plaintiff(s): Stephen P. Quinn
Plaintiff Attorney: Timothy J. McGarry
Defendant(s): Kathleen A. Gumbleton
Oadel Gumbleton

Judge: Mark R. Denton
Department: 13
Status: Closed as of May 14, 2001
Outcome: Dismissed

CLARK COUNTY FAMILY COURT

An inquiry with the Clark County Family Court found no cases involving Stephen P. Quinn.

JT00023

Jeff Quinn
August 2, 2006
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UNITED STATES CRIMINAL COURT

An inquiry with the United States Criminal Court found no cases involving Stephen P. Quinn.

UNITED STATES CIVIL COURT

An inquiry with the United States Civil Court found no cases involving Stephen P. Quinn.

UNITED STATES COURT OF APPEALS

An inquiry with the United States Court of Appeals found no cases involving Stephen P. Quinn.

UNITED STATES BANKRUPTCY COURT

An inquiry with the United States Bankruptcy Court by both name and social security number found no bankruptcy filings for Stephen P. Quinn whose social security number is [REDACTED].

LIENS, JUDGMENTS AND NOTICES OF DEFAULT

Examination of all available public records as well as inquiries with the databases CDB Infotek, Faces of the Nation and Accurint failed to identify any liens, judgments or notices of default against Stephen P. Quinn.

STOCKS, BONDS AND SECURITIES

Examination of all available public records as well as inquiries through the databases CDB Infotek, Faces of the Nation and Accurint failed to identify any stocks, bonds or securities held by Stephen P. Quinn.

CREDIT AND BANKING

Examination of all available public records including inquiries made with several sources in the banking industry revealed that Stephen P. Quinn, whose social security number is [REDACTED] and whose date of birth is [REDACTED] has an Experian/Fair Isaac Risk Score of 2 with a numerical score of 769. I was able to identify nine open accounts held by this subject. They are:

JT00024

08/02/2006 10:00 AM 104 004 1201

DILLARD LEITHAN

0007001

Jeff Guinn
August 2, 2006
Page 25

Item 1

Bank of America account number [REDACTED] is a 15-year revolving credit account opened October 1992 in the amount of \$104,500. This account was paid in full on January 1, 1998 however the account shows as being current.

Item 2

GE Moneybank/Dillard's account number [REDACTED] is a revolving charge card opened December 2000 with a \$1,000 limit. The high amount shown on the account was \$269. As of July 19, 2006 the balance was \$0. The account remains open.

Item 3

American Express account number [REDACTED] is a credit card opened January 2005. The high amount shown on this card was \$10,109. The balance as of July 16, 2006 was \$7,348. This is a current account.

Item 4

THD/CBUSA account number [REDACTED] is a revolving charge card opened July 2000 with a \$1,750 limit. The high balance shown is \$330. The balance as of July 15, 2006 is \$0. This account remains open.

Item 5

Chase account number [REDACTED] is a bank card/credit card opened June 2006. The high amount shown is \$1,159. The balance as of July 7, 2006 is \$1,159. The monthly payment is \$23.

Item 6

Discover Financial Services LLC account number [REDACTED] is a revolving credit card opened October 1996 with a \$9,500 limit. The high amount shown on this card was \$1,979. The balance as of July 7, 2006 is \$0 and the account remains open.

Item 7

Mercedes-Benz Financial account number [REDACTED] is a 24-month auto loan opened August 2005 in the amount of \$43,298. The balance as of June 30, 2006 was \$23,453. The monthly payment is \$1,804.

Item 8

Zion's First National Bank account number [REDACTED] is a bank card/revolving credit card opened December 2004 with a \$5,000 limit. The high amount shown was \$2,652. The balance as of June 29, 2006 was \$0 and the account remains open.

JT00025

08/02/2006 15:00 FAX 192 004 1491

RELEASED BY: JIM THOMAS

08/02/2006

Jeff Guinn
August 2, 2006
Page 26

Item 9
MCYDSNB account number [REDACTED] is a revolving charge card opened February 1999 with a \$500 limit. The balance as of June 28, 2006 was \$0 and the account remains open.

Through examination of all available public records as well as several contacts in the banking industry, I was unable to ascertain the location of Stephen P. Quinn's bank accounts. It appears that he possibly has accounts at Bank of America and Zion's First National Bank however I was unable to confirm this, get account numbers or current balances.

Submitted by:



Jim Thomas

JT:lt

JT00026

EXHIBIT B

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
INVESTIGATIVE REPORT OF COMPLAINT

IAB#: IAB2008-0378 SOC2008-1043
EMPLOYEE INVOLVED: Osuch, Paul P#02141

SYNOPSIS:

On October 7, 2008, the Office of Internal Affairs (OIA) received an internal complaint from Deputy Chief (DC) James Owens, P#3409. DC Owens received information from Dana Gentry, a producer for Channel 8 News that Detective Paul Osuch, P#2141, improperly obtained and shared Scope information on several citizens with a private investigator named James (Jim) Thomas. According to Gentry, James Thomas is a former Las Vegas Metropolitan Police Department (LVMPD) Officer.

EVIDENCE:

Off-Line Report
Surveillance Logs from Jim Thomas
Deposition of Jim Thomas

WEAPONS:

N/A

PROPERTY DAMAGE OR ANIMAL INJURY:

N/A

INCIDENT TIME LINE:

(See Cad or Timeline, if applicable)

July 2006 to September 2007,	Private Investigator Jim Thomas called Detective Osuch and asked him to run license plates through DMV.
August 25, 2008,	Jim Thomas had his Deposition taken.
September 18, 2008,	DC Owens was informed Officer Osuch may have disseminated Criminal History information (CHI).
September 22, 2008,	Off-line search of Steven Quinn showed Officer Osuch ran him through an LVMPD computer system.

INVESTIGATIVE SUMMARY:

(See IAPro Tasks, if applicable)

In 2006, Stephen Quinn of Precision Construction was involved in a business dispute with Jeffrey Guinn. On July 24, 2006, during the course of the dispute, Jeffrey Guinn

- 2 -

46 contracted with Private Investigator (P.I.) Jim Thomas of Jim Thomas & Associates, for
47 Thomas to conduct surveillance on Quinn and Precision Construction and to also
48 perform an Asset Investigation on Stephen Quinn and Precision Construction.

49
50 Due to a lawsuit; Discovery was ordered from each lawyer. As a result, Attorney Dennis
51 Prince received many documents from his opposing attorney. On 11-04-2008, OIA
52 interviewed Dennis Prince, the attorney that took Thomas's deposition. During the
53 interview, Prince provided OIA a copy of the deposition of Jim Thomas and a three ring
54 binder containing the surveillance reports Thomas had authored for Guinn.

55
56 Prince confirmed Thomas had a source within LVMPD. He said, Thomas, "makes
57 reference that he does have a source at the LVMPD, uh... to get the information.
58 Sometimes he just calls a source, uh... without reference to any specific law
59 enforcement agency or governmental agency may have access to that type of
60 information" (Prince 3/30-33).

61
62 On 08-25-2008, at 10:10 hours Thomas had his deposition taken at Prince's office,
63 reference his actions during the business dispute between Guinn and Quinn. OIA
64 reviewed the deposition of Jim Thomas and the surveillance reports he authored for Jeff
65 Guinn. OIA learned Thomas had his employees conduct surveillance on Quinn and
66 Precision Construction. They would monitor who went into the business and write down
67 the license plates of all vehicles entering Precision Construction. They would also follow
68 Quinn and write down the license plates of any people he met with, if they could
69 determine what vehicle they were in.

70
71 Each week Thomas would write a surveillance report. In the Surveillance Report
72 Thomas would document the license plates he was provided by his employee and call
73 "Sources" to obtain DMV and SCOPE Criminal History. He would then incorporate the
74 DMV and Criminal History information into his Surveillance Report he gave to Guinn. In
75 the reports he would state, "Per LVMPD Source" when talking about criminal history
76 information (CHI), never specifically naming who his source was.

77
78 During the deposition, Thomas was questioned about where he got the CHI information
79 located in his surveillance reports. In his deposition Thomas said, "I call friends on the
80 police department and get information as far as whether or not they have any kind of
81 criminal history" (Thomas Deposition 66/4-6). Thomas was asked if he had contacted
82 friends in the police department reference the case against Quinn, and Thomas said,
83 "Yes" (Thomas Deposition 66/13).

84
85 Thomas was asked where his sources on the police department worked. Thomas said,
86 "They work in the Detective Bureau. They work in Patrol" (Thomas Deposition 66/24-
87 25). Thomas said a private citizen could not get the same information from the police
88 department that he could due to his having friends still working that would do him
89 favors. Thomas was asked who in the Las Vegas Metropolitan Police Department he

- 3 -

90 has called in the past for CHI information. Thomas said, "I'm not going to give my
91 sources names" (Thomas Deposition 68/11).

92

93 Thomas acknowledged during his deposition that the officers giving him CHI were
94 acting inappropriately. Thomas said, "Sure. They're not supposed to give out
95 information" (Thomas Deposition 69/21-22). Thomas was asked by Prince during the
96 deposition why he was asking people to violate the rules. Thomas said, "Because I
97 need the information. That's my job" (Thomas Deposition 69/19-20).

98

99 Thomas continued to refuse to give his source names within the Las Vegas
100 Metropolitan Police Department during the deposition. Thomas was informed he would
101 be taken to District Court and compelled to answer, and he still refused to give out the
102 information.

103

104 On 12-04-2008, OIA contacted Jim Thomas at which time he refused to talk to OIA or
105 cooperate in any way with our internal investigation.

106

107 On 12-10-2008, OIA interviewed Sergeant (Sgt) Daniel Flaherty, Officer Osuch's
108 immediate supervisor in the Fugitive Detail for the Las Vegas Metropolitan Police
109 Department. Sgt. Flaherty told OIA, each week he contacts the PIO (Public Information
110 Office) with a wanted person's name or ID number for broadcast on the local news.

111

112 Recently, when Sgt Flaherty was talking with Sgt. Loretto of the PIO office, he was
113 asked if Officer Osuch worked for him. Sgt. Flaherty said he did and asked why. Sgt
114 Loretto told Sgt. Flaherty Dana Gentry, a local news producer, gave him information that
115 Officer Osuch was allegedly running CHI for a retired LVMPD officer who is now a
116 private investigator.

116

117 Sgt. Flaherty confronted Officer Osuch and asked him if he was running CHI for a
118 Private Investigator. Sgt Flaherty told OIA, "I called Paul in the office and that's when I
119 had said to Paul I go hey are you running CHI for a PI and he said no I'm not I'm run...
120 he goes I ran a couple of plates for a retired Police Officer and I'm like okay I said well
121 you can't do that and ah... he said well he's a retired cop and you know he's doing
122 Criminal Investigations for Insurance Fraud or something like that, and I go Paul you
123 can't do that, and that was it" (Flaherty 4/33-38). Sgt Flaherty then informed Lt. Lee of
124 what he had learned.

125

126 Sgt. Flaherty described Officer Osuch's reaction when he confronted him about running
127 CHI. Sgt. Flaherty said, "Paul's a very chatty guy and he immediately went like he did
128 when we relieved him of duty he kinda went into an apology mode like oh my GOD, I
129 just ran a couple of plates" (Flaherty 6/12-14). OIA asked Sgt. Flaherty what he (Sgt.
130 Flaherty) thought a couple of plates meant and he said 2 or 3.

131

132 Sgt. Flaherty told OIA, "Tuesday is when I called everybody in, but I'm pretty sure that
133 day I told Ted about it. Ted even told me later on that he had called...had a long lengthy
134 conversation with John Loretto also. I go on vacation for two weeks I come back. One

- 4 -

135 of my guys had a use of force, so I went into Blue Team. As I was in Blue Team I never
136 check my dash board, so I went into my little dash board, and I saw where it says
137 complaint Statement Of Complaint under Paul I said (1) so I knew there been...and I
138 found out later that the chief had did an SOC and then I didn't hear anything else until
139 we relieved him of duty" (Flaherty 5/25-33).

140

141 On 11/21/2008, at 14:40 hours, Officer Osuch was read the investigative notice and an
142 interview date of Wednesday November 26, 2008, at 13:00 hours. Before Officer Osuch
143 could be interviewed, he retired from employment with the Las Vegas Metropolitan
144 Police Department. Officer Osuch refused to come in to be interviewed after his
145 retirement.

146

147 In the surveillance report dated March 2, 2007, Thomas says he was unable to run all
148 the license plates for the week's surveillance due to his source being ill. OIA received
149 Leave Slips from LVMPD payroll for Officer Osuch. OIA learned Officer Osuch took a
150 Professional Day on 03/01/2007. In the Surveillance Report dated 08/17/2007, Thomas
151 noted his contact that was running DMV for him was out of state, (Page 11). OIA
152 confirmed Officer Osuch submitted a leave slip for 08/13/2007 and 08/14/2007.

153

154 OIA reviewed the surveillance reports Prince provided to OIA, and compiled a list of
155 license plates and names which had a notation of "Per LVMPD Source". OIA had 225
156 Off-Line Searches performed on JLINK, the LVMPD access point for DMV records. OIA
157 learned Officer Osuch ran 72 license plates through DMV and one person through
158 SCOPE that corresponded to the Surveillance report's dates of September 2006
159 through May 2007.

160

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178

EXHIBIT C

Las Vegas Sun

Face to Face: The Final Take

UPDATES FROM EXECUTIVE PRODUCER DANA GENTRY

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Metro Sued over SCOPE

By **Dana Gentry** · March 5, 2009 · 1:44 PM

During a November program we told you about a private investigator, Jim Thomas, who obtained reports from Metropolitan Police containing social security numbers and other confidential information on hundreds of unwitting citizens. Thomas was doing the bidding of local businessman Jeff Guinn, the son of then-Governor Kenny Guinn. The younger Guinn hired Thomas to dig up dirt on Steve Quinn, a local contractor Guinn was suing.

While Guinn came up empty, our digging unearthed a disturbing abuse of power probably not isolated to the case at hand. Now Metro and others are being sued by Quinn.

Last week on the program Sheriff Doug Gillespie promised a new day at Metro and confirmed a "ridiculous" number of SCOPES had been run on Quinn, his family, a handful of acquaintances and mostly unfortunate motorists who ventured into a driveway near Quinn's building. Gillespie says the internal investigation is ongoing into the actions of the alleged offender, former Detective Paul Osuch, who resigned after our program aired in November.

Depositions in the case reveal that Metro also conducted drug surveillance of Quinn's business based on a request from Jeff Guinn. Metro says anyone can and should report suspicious activity but that a drug surveillance would require probable cause. Absent that cause, how was Guinn able to get Metro to take part?

Stay tuned for updates as the lawsuit progresses.

The lawsuit, original program and Sheriff Gillespie's appearance are posted to the right.

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EXHIBIT D

AFFIDAVIT OF DIRECTOR MIKE SNYDER

STATE OF NEVADA)
)ss:
COUNTY OF CLARK)

I, MIKE SNYDER, being first duly sworn, do depose and say as follows:

1. I am employed by the Las Vegas Metropolitan Police Department (“LVMPD”) as the Director of Labor Relations. I have been employed by LVMPD for approximately 13 years. I have personal knowledge of the facts stated herein, except those which are stated upon information and belief, which I believe them to be true. I am competent to testify in a court of law regarding the facts stated herein. I make this Affidavit in support of LVMPD’s Motion for Summary Judgment.

2. LVMPD maintains a written policy governing the access and dissemination of certain sensitive information, including criminal history information (“CHI”). The policy, *Dissemination of Criminal History Information*, 5/105.18, provides, in part:

All requests for criminal history information (CHI) from criminal justice and non-criminal justice agencies (except those made from within this Department) shall be referred to the Records Bureau except as noted below. This also includes inquires wherein no record exists...

(Exhibit A1).

3. Further, the Policy specifically prohibits employees from requesting, using or releasing CHI (1) outside of official duties; (2) for personal use, interest or gain; or (3) where dissemination would otherwise violate local, state or federal law or inter-local governments or inter-state contracts.

4. CHI is stored on the SCOPE database, which stands for Shared Computer Operation for Protection and Enforcement.

5. In addition to the Policy, employees with access to SCOPE or other law enforcement information databases, are repeatedly notified and warned that improper use of the databases, including improper access or dissemination of CHI is in violation of LVMPD policy.

6. LVMPD considers violations of the Dissemination Policy very serious and, in fact, includes the violation as a line item on its Disciplinary Decision Guide (“Matrix”). The Matrix is a negotiated item between the collective bargaining units and LVMPD which establishes an appropriate discipline for the enumerated, sustained violations. *(Exhibit B1)*. A first offense for disseminating information described in 5/105.18 *Dissemination of Criminal History Information* warrants a major suspension. (Id. at p. 19, line 20). A major suspension is defined in the Guide as 40 to 160 hours, however, recently the Sheriff issued a Memorandum of Understanding that no employee will be subject to a major hour suspension exceeding 40 hours for misconduct, unless the conduct warrants termination or a greater discipline.

7. When LVMPD becomes aware of access and/or dissemination violations by its employees, after an investigation is completed and the misconduct is sustained, the

employee is disciplined in accordance with the Matrix. Since 2005, twelve employees have been disciplined for violating the Dissemination Policy.

8. LVMPD does not encourage or allow its employees to misuse the database(s) for improper use and does not have a policy which allows employees to improperly use the information contained on the database(s).

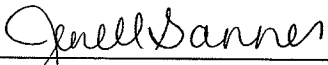
FURTHER AFFIANT SAYETH NAUGHT.

DATED this 28 day of October, 2009.



DIR. MIKE SNYDER

SUBSCRIBED and SWORN to before me
this 28 day of October, 2009.



NOTARY PUBLIC in and for said
County and State

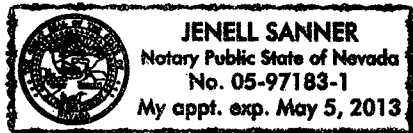


EXHIBIT E

MARQUIS & AURBACH
10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

1 **Marquis & Aurbach**
NICK D. CROSBY, ESQ.
2 Nevada Bar No. 8996
10001 Park Run Drive
3 Las Vegas, Nevada 89145
Telephone: (702) 382-0711
4 Facsimile: (702) 382-5816
ncrosby@marquisaurbach.com
5 Attorneys for LVMPD

6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 STEPHEN P. QUINN, an individual,
9 Plaintiff,
10 vs.

Case No: 2:09-cv-00588-KJD-RJJ

11 JAMES THOMAS, an individual; JIM
12 THOMAS & ASSOCIATES, a Nevada licensed
private investigation firm; LAS VEGAS
13 METROPOLITAN POLICE DEPARTMENT, a
political subdivision of the State of Nevada; DOE
14 POLICE OFFICERS I-X, in their official and
individual capacities; STATE OF NEVADA;
15 NEVADA DEPARTMENT OF MOTOR
VEHICLES; DOE NEVADA DEPARTMENT
16 OF MOTOR VEHICLES EMPLOYEES XI-XX,
in their official and individual capacities; DOES
17 XXI through XXX, inclusive, ROE BUSINESS
ENTITIES XXXI through XL,
18 Defendant.

19 **LVMPD'S ANSWERS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES**

20 Pursuant to FRCP 33, Defendant, Las Vegas Metropolitan Police Department
21 ("LVMPD") by and through its attorney of record, Nick D. Crosby, Esq., with the law firm of
22 Marquis & Aurbach, hereby respond to Plaintiff's First Set of Interrogatories.

23 **INTERROGATORIES**

24 **INTERROGATORY NO. 1:**

25 Identify the name, address and telephone number of each and every LVMPD employee or
26 agent who ran a SCOPE of Plaintiff Stephen P. Quinn.

27 ...

28 ...

MARQUIS & AURBACH
10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

1 **ANSWER TO INTERROGATORY NO. 1:**

2 Objection; the Interrogatory is overly broad, unduly burdensome, vague, ambiguous,
3 confusing and not calculated to lead to the discovery of admissible evidence. Specifically,
4 LVMPD is unsure as to what Plaintiff means with respect to "ran a SCOPE of Plaintiff."
5 Further, to the extent the Interrogatory seeks information which is protected from disclosure,
6 LVMPD hereby objects. Without waiving said objections, and to the extent Plaintiff seeks the
7 identity of LVMPD employees who entered a query into the SCOPE database under the name
8 "Stephen P. Quinn," the following individuals queried Plaintiff's name:

- 9 1. Rachael Huntington, P#8316, Fingerprint/Work Cards – LVMPD;
- 10 2. Jennifer Medina, P#8506, Fingerprint/Work Cards – LVMPD;
- 11 3. Noe Larios, P#7166 – South Central Area Command – LVMPD;
- 12 4. Paul Osuch, P#2141 – Fugitive (retired); and
- 13 5. Kai Degner, P#3704 – Internal Affairs – LVMPD.

14 With respect to addresses and telephone numbers of the employees, the home addresses
15 of peace officers are protected from disclosure. For all individuals identified, excluding Paul
16 Osuch:

Marquis & Aurbach
10001 Park Run Drive
Las Vegas, Nevada 89145
Phone: 382-0711
Fax: 382-5816

17
18
19
20 **INTERROGATORY NO. 2:**

21 Identify the name, address and telephone number of each and every LVMPD employee
22 who ran a SCOPE and communicated the results to private investigator James Thomas.

23 **ANSWER TO INTERROGATORY NO. 2:**

24 Objection; the Interrogatory is overly broad, unduly burdensome, vague, ambiguous, and
25 not calculated to lead to the discovery of admissible evidence. Without waiving said objection,
26 LVMPD conducted an internal investigation and learned that retired Officer Paul Osuch
27 provided information contained in SCOPE to Investigator James Thomas. Retired Officer Osuch
28 is no longer employed with LVMPD.

MARQUIS & AURBACH
10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

1 **INTERROGATORY NO. 3:**

2 Identify the names of every LVMPD employee who ran a SCOPE on any individual at
3 the request of James Thomas in the last ten (10) years.

4 **ANSWER TO INTERROGATORY NO. 3:**

5 Objection; the Interrogatory is overly broad, unduly burdensome, vague, ambiguous, and
6 not calculated to lead to the discovery of admissible evidence. Specifically, it is impossible to
7 respond to the Interrogatory, as LVMPD has no way of identifying who ran a query at the
8 request of J. Thomas.

9 **INTERROGATORY NO. 4:**

10 Identify the name, address and telephone number of all persons involved in the internal
11 investigation of a SCOPE(S) of Stephen P. Quinn or any other person who has been identified as
12 a witness in this litigations including but not limited to the following:

- 13 1. The date the investigation was commenced;
- 14 2. The date the Complaint was received;
- 15 3. All members of LVMPD who were involved in the investigation; and
- 16 4. The outcome of the investigation including any and all disciplinary measures
17 taken against LVMPD employees.

18 **ANSWER TO INTERROGATORY NO. 4:**

19 Objection; the Interrogatory is overly broad, unduly burdensome, vague, ambiguous, and
20 not calculated to lead to the discovery of admissible evidence. Further, information contained in
21 an Internal Affairs investigation is confidential and cannot be disclosed. Without waiving said
22 objection, an internal complaint was received by the Office of Internal Affairs on October 7,
23 2008, thereby initiating an internal investigation.

24 **INTERROGATORY NO. 5:**

25 The name, address and telephone number of each and every LVMPD employee and/or
26 agent who ran a SCOPE on the individuals identified in Exhibit "A" attached hereto.

27 ...

28 ...

MARQUIS & AURBACH
10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

1 **ANSWER TO INTERROGATORY NO. 5:**

2 Objection; the Interrogatory is overly broad, unduly burdensome, vague, ambiguous, and
3 not calculated to lead to the discovery of admissible evidence.

4 **INTERROGATORY NO. 5 [sic]:**

5 Identify the name, address and telephone number of each and every LVMPD employee
6 and/or agent who was in any way involved in the investigation of the propriety of the SCOPES
7 ran on Stephen P. Quinn or any other individual identified in Exhibit "A."

8 **ANSWER TO INTERROGATORY NO. 5 [sic]:**

9 Objection; the Interrogatory is overly broad, unduly burdensome, vague, ambiguous,
10 confusing and not calculated to lead to the discovery of admissible evidence. To the extent the
11 Interrogatory seeks information regarding the persons involved in the internal investigation of
12 the access and dissemination of criminal history information in violation of LVMPD policy, the
13 same is protected from disclosure. Without waving said objection, detectives in the Office of
14 Internal Affairs conducted an investigation into the allegation specifically Kai Degner, Sgt. Kelly
15 McMahill, and Michael Hnatuick.

16 **INTERROGATORY NO. 6:**

17 Identify the name, address and telephone number of each and every witness who has
18 knowledge of facts which support your denials to the allegations in the Complaint.

19 **ANSWER TO INTERROGATORY NO. 6:**

20 See LVMPD's Initial Disclosure of Documents and Witnesses.

21 **INTERROGATORY NO. 7:**

22 Identify the name, address and telephone number of each and every witness who has
23 knowledge of facts which support your affirmative defenses in the Complaint.

24 **ANSWER TO INTERROGATORY NO. 7:**

25 See Answer to Interrogatory No. 6.

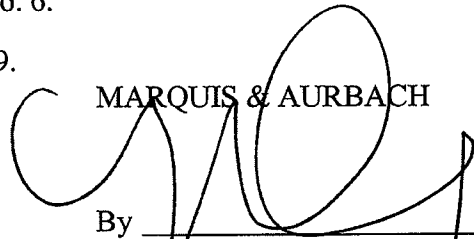
26 **INTERROGATORY NO. 8:**

27 Identify each and every witness whom you reasonably anticipate calling at the time of
28 trial in this matter.

1 **ANSWER TO INTERROGATORY NO. 8:**

2 Objection; the Interrogatory is overly broad and premature. Without waiving said
3 objection, see Answer to Interrogatory No. 6.

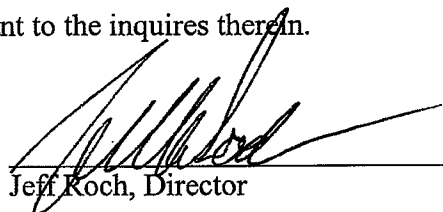
4 Dated this 25th day of June, 2009.

MARQUIS & AURBACH
By 
Nick D. Crosby, Esq.
Nevada Bar No. 8996
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorney(s) for LVMPD

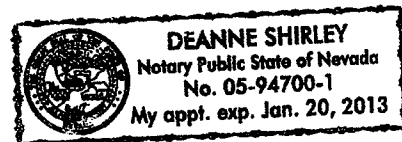
11 **VERIFICATION**

12 Jeff Roch, being first duly sworn, deposes and says:

13 That I am the Director of Risk Management for Las Vegas Metropolitan Police
14 Department, named Defendant in the above-entitled action; that I have read the foregoing
15 document and know the contents thereof; the same is true based upon my review of the
16 documents and information relevant to the inquires therein, except as to those matters therein
17 stated on information and belief and, as to those matters, I believe them to be true based upon my
18 review of the documents and information relevant to the inquires therein.
19

20 
21 Jeff Roch, Director
22

23
24 SUBSCRIBED AND SWORN to before
25 me this 24 day of JUNE, 2009.



26 
27 NOTARY PUBLIC in and for said
28 COUNTY AND STATE

MARQUIS & AURBACH
10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

CERTIFICATE OF MAILING

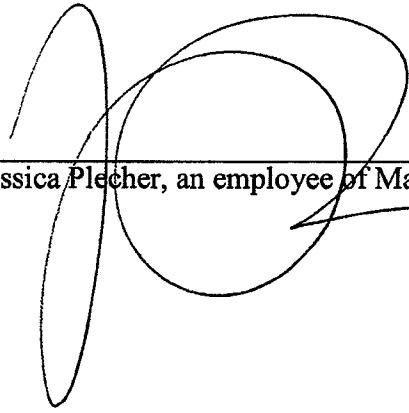
I hereby certify that on the 25 day of June, 2009, I served a copy of the foregoing
**LVMPD'S RESPONSES TO PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS** upon each of the parties by depositing a copy of the same in a sealed envelope
in the United States Mail, Las Vegas, Nevada, First-Class Postage fully prepaid, and addressed
to:

Dennis M. Prince
PRINCE & KEATING
3230 S. Buffalo Drive, Ste. 108
Las Vegas, Nevada 89117
Attorney for Plaintiff

Marsha L. Stephenson, Esq.
STEPHENSON & DICKINSON, P.C.
2820 West Charleston Blvd., Ste. 19
Las Vegas, Nevada 89102
Attorney for Defendants James Thomas
and Jim Thomas & Associates

Catherine Cortez Masto, Attorney General
Kimberly A. Buchanan, Sr. Attorney General
PUBLIC SAFETY DIVISION
555 East Washington Ave., #3900
Las Vegas, Nevada 89101
Attorneys for Defendant Nevada Department of Motor Vehicles

and that there is a regular communication by mail between the place of mailing and the place(s)
so addressed.



Jessica Plecher, an employee of Marquis & Aurbach

MARQUIS & AURBACH
10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

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EXHIBIT F

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Plaintiff STEPHEN P. QUINN ("Quinn"), by and through his attorneys, PRINCE & KEATING, responds to Defendant LVMPD's First Set of Interrogatories as follows:

INTERROGATORY NO. 1:

Please state all facts supporting your claim that LVMPD violated your right(s) secured by the Fourteenth Amendment to the United States Constitutional, as alleged in the Sixth Cause of Action of the First Amended Complaint on file herein.

ANSWER NO. 1:

Quinn has a right and an expectation of privacy in personal and confidential information, including, but not limited to, date of birth, social security number and criminal history information. LVMPD had a duty and obligation to protect Quinn from unauthorized disclosure and dissemination of this information to members of the public for their use, knowledge and/or abuse. At the time the confidential information was disclosed to Defendants James Thomas and Jim Thomas & Associates ("Thomas"), one or more LVMPD's employees, acting in the scope and course of their employment, knew or were aware that Quinn was involved in a lawsuit with Jeffrey B. Guinn ("Guinn") and that it was Guinn's intent to injure Quinn, his reputation and his business.

INTERROGATORY NO. 2:

Please state all facts supporting your claim that LVMPD tortuously invaded your privacy, as alleged in the Fourth Claim for Relief of the First Amended Complaint on file herein.

ANSWER NO. 2:

Quinn has a right and an expectation of privacy in personal and confidential information, including, but not limited to, date of birth, social security number and criminal history information. LVMPD had a duty and obligation to protect Quinn from unauthorized disclosure

1 and dissemination of this information to members of the public for their use, knowledge and/or
2 abuse. At the time the confidential information was disclosed to Defendants James Thomas and
3 Jim Thomas & Associates ("Thomas"), one or more LVMPD's employees, acting in the scope
4 and course of their employment, knew or were aware that Quinn was involved in a lawsuit with
5 Jeffrey B. Guinn ("Guinn") and that it was Guinn's intent to injure Quinn, his reputation and his
6 business.
7

8 **INTERROGATORY NO. 3:**

9 Please state how any alleged "background searches" of individuals who entered the
10 parking lot of Plaintiff's business or home violated the Plaintiff's privacy, as alleged in the Fourth
11 Claim for Relief of the First Amended Complaint on file herein.
12

13 **ANSWER NO. 3:**

14 One or more employees of LVMPD, in the course and scope of their employment,
15 provided confidential, personal and criminal history information for more than 240 people to
16 investigator James Thomas. The LVMPD employee(s) knew or were made aware that the
17 information was part surveillance of Quinn in a lawsuit *Precision Construction, Inc., et al. vs.*
18 *Jeffrey Guinn, et al.* The LVMPD employee(s) knew, were aware or should have known that
19 Guinn intended to use that information to injure Quinn, destroy his reputation and business.
20

21 **INTERROGATORY NO. 4:**

22 Please state, with specificity, each and every fact which supports your contention that
23 LVMPD "intentionally and unreasonably intruded upon the seclusion of [Plaintiff] by completing
24 more than one year of sub rosa surveillance of [plaintiff] and his family, including following,
25 [Plaintiffs] handicap child to school" as alleged in the Fourth Claim for relief of the
26 First Amended Complaint.
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ANSWER NO. 4:

Upon information and belief, LVMPD conducted a narcotics investigation and surveillance on Quinn. The narcotics investigation was initiated by Kai Degner who has close ties to Guinn. Discovery is continuing therefore Plaintiff reserves his right to supplement his answer to this interrogatory, if needed.

INTERROGATORY NO. 5:

Please state each and every fact which supports your contention that L VMPD "intended and/or recklessly disregarded the severe emotional distress" that its actions would cause as alleged in the Fifth Claim for relief of the First Amended Complaint on file herein.

ANSWER NO. 5:

Quinn has a right and an expectation of privacy in personal and confidential information, including, but not limited to, date of birth, social security number and criminal history information. LVMPD had a duty and obligation to protect Quinn from unauthorized disclosure and dissemination of this information to members of the public for their use, knowledge and/or abuse. At the time the confidential information was disclosed to Defendants James Thomas and Jim Thomas & Associates ("Thomas"), one or more LVMPD's employees, acting in the scope and course of their employment, knew or were aware that Quinn was involved in a lawsuit with Jeffrey B. Guinn ("Guinn") and that it was Guinn's intent to injure Quinn, his reputation and his business.

INTERROGATORY NO. 6:

Please describe, with specificity, any injury, whether physical, non-physical, mental or emotional suffered as a result of the actions of LVMPD as alleged in the First amended Complaint on file herein.

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ANSWER NO. 6:

As a result of LVMPD's and its employees' actions, Quinn has suffered severe emotional distress, anxiety, worry and embarrassment.

INTERROGATORY NO. 7:

Describe and injuries and complaints of any nature, whatsoever, whether objective or subjective, Plaintiff suffered as a result of the conduct described in the First Amended Complaint as it relates to LVMPD or its employees, agents or officers, which Plaintiff's doctors are aware of or suspect.

- a) List and describe in specific detail and location of all of Plaintiff's injuries, within or upon Plaintiff's body and the nature of Plaintiff's injury complaint; and
- b) If Plaintiff has completely recovered from each and every injury identified in the First Amended Complaint, state the date Plaintiff recovered from each injury.

ANSWER NO. 7:

Objection. This Interrogatory is vague, ambiguous, overbroad and not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 8:

If Plaintiff received medical care or treatment from any doctor, or anyone as a result of any injuries Plaintiff claims to have received as a result of the incident(s), please supply answers to the following:

- (a) The date Plaintiff first received medical care and treatment, and the type and location (upon or within Plaintiff's body) of each injury for which Plaintiff was treated;
- (b) The name and address of each such doctor, or other practitioner, including

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the doctor's specialty, if any, whom Plaintiff has seen for medical care or treatment as a result of the injuries received in this incident; and

(c) The dates and care of treatment from each such person.

ANSWER NO. 8:

Quinn has not sought any medical treatment or psychological treatment as a result of the actions of LVMPD and its employees.

INTERROGATORY NO. 9:

Please identify, with particularity, each and every non-physical and/or psychological damage Plaintiff claims to have suffered as a result of the alleged incident(s) complained of in the Amended Complaint. In responding, please provide the name of any physician or other professional from whom Plaintiff sought treatment for the alleged non-physical injuries.

ANSWER NO. 9:

As a result of LVMPD's and its employees' actions, Quinn has suffered severe emotional distress, anxiety, worry and embarrassment.

INTERROGATORY NO. 10:

Please state, with specificity and in narrative form, each and every policy, practice, plan or scheme of LVMPD which is unconstitutional and deprived Plaintiff of any constitutional right, as contemplated in the First Amended Complaint.

ANSWER NO. 10:

Objection. This Interrogatory is overbroad, vague, ambiguous and seeks information protected by the attorney/client and attorney work product privileges.

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INTERROGATORY NO. 11:

Please describe in detail, the "great anguish of mind" Plaintiff allegedly suffered, as identified in Paragraph 57 of the First Amended Complaint on file herein.

ANSWER NO. 11:

LVMPD allowed its employees to utilize SCOPE and disseminate confidential information in which Quinn has an expectation of privacy. Also, LVMPD failed to properly supervise its employees to prevent the dissemination of confidential and personal information. Also, LVMPD failed to prevent the dissemination of confidential information of Plaintiff's business associates and acquaintances. This has caused Quinn to suffer great mental anguish, worry, anxiety and stress.

INTERROGATORY NO. 12:

Please describe, in detail, the "substantial expenses" Plaintiff incurred as alleged in Paragraph 57 of the First Amended Complaint on file herein. In responding to the Interrogatory, please identify each and every documents which supports any "substantial expenses" as identified in Paragraph 57 of the First Amended Complaint on file herein, and the dates in which any "substantial expense" was incurred as a direct result of any conduct of LVMPD as alleged in the First Amended Complaint on file herein.

ANSWER NO. 12:

Quinn is incurring substantial attorney fees and costs in pursuit of this action and is entitled to an amount of attorney's fees as allowed under 42 U.S.C. 1983 *et seq.*

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INTERROGATORY NO. 13:

Please state, with specificity and in great detail how Plaintiff was "prevented from transacting his usual business" as a result of any conduct of L VMPD, as alleged in Paragraph 57 of the First Amended Complaint on file herein.

ANSWER NO. 13:

Quinn's business was impacted and interfered by reason of Defendant's conduct. Defendant's conduct was extreme, outrageous, humiliating and caused great mental anguish and stress.

INTERROGATORY NO. 14:

Please state, with specificity and in great detail each and every fact which supports Plaintiff's contention that L VMPD "engaged in conduct which is fraudulent and oppressive" as alleged in Paragraph 65 of the First Amended Complaint on file herein.

ANSWER NO. 14:

Quinn has a right and an expectation of privacy in personal and confidential information, including, but not limited to, date of birth, social security number and criminal history information. LVMPD had a duty and obligation to protect Quinn from unauthorized disclosure and dissemination of this information to members of the public for their use, knowledge and/or abuse. At the time the confidential information was disclosed to Defendants James Thomas and Jim Thomas & Associates ("Thomas"), one or more LVMPD's employees, acting in the scope and course of their employment, knew or were aware that Quinn was involved in a lawsuit with Jeffrey B. Guinn ("Guinn") and that it was Guinn's intent to injure Quinn, his reputation and his business.

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INTERROGATORY NO. 15:

Please state, with specificity and in great detail, each and every fact supporting any claim for damages alleged by Plaintiff and in which Plaintiff seeks to recover at the time of trial and, more specifically, any fact which demonstrates that Plaintiff suffered damages in excess of \$10,000.00, as alleged in the First Amended Complaint on file herein.

ANSWER NO. 15:

Objection. This Interrogatory is overbroad as to time, unreasonably burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 16:

Please state each and every occurrence when the Plaintiff has provided his social security number or date of birth to a third party.

ANSWER NO. 16:

Objection. This Interrogatory is overboard as to time and scope and not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 17:

Please state, with specificity and in narrative form, the facts underlying the civil lawsuit/disagreement between Plaintiff and other parties in Case No. A519586 as described in the First Amended Complaint on file herein

ANSWER NO. 17:

In addition to damages for pain, suffering, worry, anxiety, stress and emotional distress, Quinn will also be seeking an award of attorney's fees and costs as allowed under 42 U.S.C. 1983.

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INTERROGATORY NO. 18:

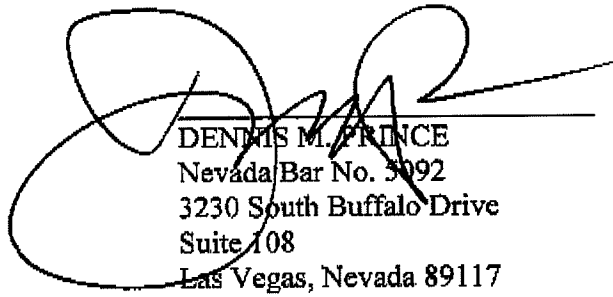
Please list all damages Plaintiff seeks to recover at the time of trial. When responding to the Interrogatory, please be mindful of the mandate by Federal Rule of Civil Procedure 26 which requires Plaintiff to disclose a calculation of damages for each category of claim identified.

ANSWER NO. 18:

In addition to damages for pain, suffering, worry, anxiety, stress and emotional distress, Quinn will also be seeking an award of attorney's fees and costs as allowed under 42 U.S.C. 1983.

DATED this 7th day of October, 2009.

PRINCE & KEATING



DENNIS M. PRINCE
Nevada Bar No. 3092
3230 South Buffalo Drive
Suite 108
Las Vegas, Nevada 89117
Attorney for Plaintiff
Stephen P. Quinn

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VERIFICATION

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

STEPHEN P. QUINN, being first duly sworn, deposes and says:

That he is the Plaintiff in the above-entitled matter; that he has read the foregoing ANSWERS TO DEFENDANT LVMPD'S FIRST SET OF INTERROGATORIES, knows the contents thereof; and that the same are true to his own knowledge, except as to those matters therein stated upon information and belief and as to those he believes them to be true.

STEPHEN P. QUINN

SUBSCRIBED AND SWORN to before me
this ____ day of October, 2009.

NOTARY PUBLIC in and for said
County and State

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CERTIFICATE OF SERVICE

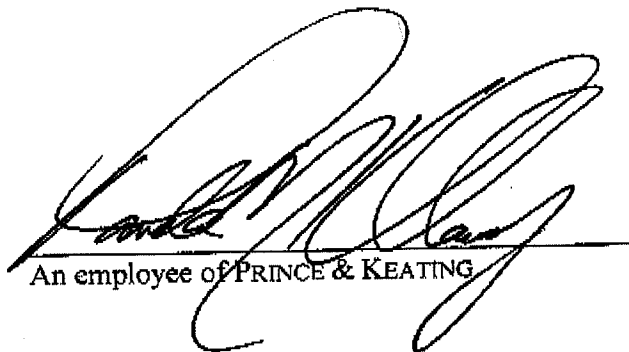
I hereby certify that on the 7th day of October, 2009, I caused service of the foregoing

Plaintiff's Answers to Defendant LVMPD's First Set of Interrogatories to be made by
facsimile and/or depositing a true and correct copy of same in the United States Mail, postage
fully prepaid, addressed to the following:

Nick D. Crosby, Esq.
MARQUIS & AURBACH
10001 Park Run Drive
Las Vegas, Nevada 89145
Facsimile: 382-5816
Attorney for Defendant
Las Vegas Metropolitan Police Department

Marsha L. Stephenson, Esq.
STEPHENSON & DICKINSON, P.C.
2820 West Charleston Boulevard, Suite 19
Las Vegas, Nevada 89102
Attorney for Defendant
James Thomas and Jim Thomas & Associates

Catherine Cortez Masto, Attorney General
Kimberly A Buchanan, Sr. Attorney General
PUBLIC SAFETY DIVISION
555 East Washington Avenue, #3900
Las Vegas, Nevada 89101
Attorneys for Defendant
Nevada Department of Motor Vehicles


An employee of PRINCE & KEATING