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1 **LAGOMARSINO LAW**
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5 *Attorneys for Plaintiff Angela Evans*

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

8 ANGELA EVANS, individually;
9
10 Plaintiff,
11 v.

CASE NO.: 2:20-cv-01919-RFB-VCF

**STIPULATION AND ORDER TO
FILE FIRST AMENDED COMPLAINT**

11 NYE COUNTY SHERIFF'S OFFICE, a
political subdivision of the State of Nevada;
12 DAVID BORUCHOWITZ, individually,
13
14 Defendants.

15 IT IS HEREBY STIPULATED by and between the parties, and their attorneys of record,
16 that for good cause shown, that Plaintiff can file her proposed First Amended Complaint
17 substituting Nye County in the place and stead of the Nye County Sheriff's Office, a copy of which
18 is attached hereto as Ex. 1.

19 **IT IS SO STIPULATED AND AGREED.**

20 DATED this 1st day of June, 2021.

DATED this 1st day of June, 2021.

21 **LAGOMARSINO LAW**

MARQUIS AURBACH COFFING

22 /s/ Andre M. Lagomarsino
23 ANDRE M. LAGOMARSINO, ESQ. (#6711)
24 CORY M. FORD, ESQ. (#15042)
25 *Attorneys for Plaintiff Angela Evans*

/s/ James R. Beckstrom
CRAIG R. ANDERSON, ESQ. (#6882)
JAMES A. BECKSTROM, ESQ. (#14032)
*Attorneys for Defendants
Nye County Sheriff's Office
and David Boruchowitz*

IT IS SO ORDERED.

IT IS HEREBY ORDERED that
Plaintiff must file the Amended
Complaint on or before June 7,
2021.


UNITED STATES MAGISTRATE JUDGE
DATED: 6-1-2021

EXHIBIT 1 –
Plaintiff's First
Amended Complaint

1 **LAGOMARSINO LAW**
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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 ANGELA EVANS, individually

11 Plaintiff,

12 v.

13 NYE COUNTY ~~SHERIFF'S OFFICE~~, a
political subdivision of the State of Nevada;
14 DAVID BORUCHOWITZ, individually,

15 Defendants.

CASE NO:

FIRST AMENDED COMPLAINT
AND JURY DEMAND

16 COMES NOW, Plaintiff ANGELA EVANS, individually, by and through her counsel
17 ANDRE M. LAGOMARSINO, ESQ. and CORY M. FORD, ESQ., of LAGOMARSINO LAW,
18 and hereby files the following **FIRST AMENDED** Complaint with this Honorable Court.

19 **JURISDICTION AND VENUE**

20 1. This civil action is brought for the redress of alleged deprivations of constitutional
21 rights as protected by 42 U.S.C. §1983, the Fourth Amendment to the United States Constitution,
22 and under the laws of the State of Nevada. Jurisdiction is based upon 28 U.S.C. §1331. This Court
23 has supplemental jurisdiction over the Plaintiff's state law claims under 28 U.S.C. §1367.

24 2. Venue in this District is proper because all facts plead and all acts and omissions
25 giving rise to this Complaint occurred in Clark County, Nevada in the District of Nevada.

PARTIES TO THIS ACTION

1
2 3. At all times relevant herein, Plaintiff Angela Evans (“Plaintiff”) was a resident of
3 Nye County, Nevada, over 18 years of age, and subject to the unlawful actions of Defendants as
4 described herein.

5 4. At all times relevant herein, Defendant NYE COUNTY ~~SHERIFF’S OFFICE~~
6 (“~~NCSO~~”) was, and is, a political subdivision of the State of Nevada. The Nye County Sheriff’s
7 Office (“~~NCSO~~”) is a law enforcement agency in Nye County, Nevada. ~~Defendant~~ NCSO is
8 responsible for the training, hiring, control, and supervision of all its officers, which include
9 lieutenants, as well as the implementation and maintenance of official and unofficial policies.
10 ~~NCSO~~ employed Defendant David Boruchowitz.

11 5. At all times relevant herein, Defendant DAVID BORUCHOWITZ (hereinafter
12 “Boruchowitz”) was employed as a lieutenant with **the** Nye County Sheriff’s Office. Boruchowitz
13 is a United States citizen and, upon information and belief, a resident of Nye County, Nevada.
14 Boruchowitz is being sued in his individual capacity.

15 6. At all times relevant herein, all of the actions Defendant Boruchowitz were
16 performed under color of state law and pursuant to his authority as a lieutenant and police officer.

ALLEGATIONS COMMON TO ALL CLAIMS

17
18 7. Paragraphs 1 through 6 are hereby specifically included and incorporated as though
19 fully set forth herein.

20 8. On October 1, 2018, Plaintiff was appointed Chief Executive Officer (“CEO”) of
21 Valley Electric Association, Inc. (“VEA”).

22 9. Plaintiff was the first female, Hispanic CEO at VEA since it was founded in 1965.

23 10. In February 2019, VEA’s offices were raided by NCSO on two (2) separate
24 occasions after obtaining two (2) separate search warrants to investigate alleged embezzlement.

25 . . .

1 11. On or about February 21, 2019, Detective Jose Parra of the NCSO applied for a
2 search warrant in the Pahrump Township Justice Court after allegedly being advised that the reason
3 for a rate hike at VEA was because of an extensive financial cover up of sexual misconduct
4 allegedly perpetrated by Thomas Husted, the prior CEO at VEA.

5 12. In the Application and Affidavit for Search Warrant filed with the Pahrump
6 Township Justice Court on or about February 21, 2019, Affiant Detective Jose Parra alleged that he
7 believed that there was probable cause that evidence existed for a violation of Nevada Revised
8 Statute NRS 205.300, Embezzlement, and that the evidence was currently concealed within the
9 VEA corporate offices.

10 13. Upon information and belief, the alleged existence of probable cause contained in
11 the February 21, 2019, Application and Affidavit for Search Warrant was completely unfounded
12 based on the allegations alleged.

13 14. Specifically, Affiant Detective Parra wrongfully alleged, among other things, that
14 the NCSO interviewed former VEA employees who “revealed that [Plaintiff], the replacement
15 CEO, additionally received substantial payment and was involved in the handling of payments and
16 non-disclosure agreements to the other employees.”

17 15. Additionally, it also wrongfully alleged in the search warrant that these employees
18 revealed that Plaintiff “was also paramount in ensuring that the information of this misconduct was
19 not leaked,” and that it was believed that “in excess of one million dollars of Valley Electric
20 Members monies that were used to ensure this misconduct was not revealed to anyone.”

21 16. Based on the incomplete and inaccurate set of facts, Justice of the Peace Lisa
22 Chamlee found probable cause to issue the search warrant.

23 17. On or about February 22, 2019, the search warrant was then executed by the NCSO.
24 During the execution of this search warrant, VEA employees, which included Plaintiff, were denied
25 access to counsel, outside communication and were detained in the boardroom of VEA for more

1 than five (5) hours. Plaintiff, as CEO, was denied requests to speak with VEA general
2 counsel. Deputies even required detained VEA employees to ask permission before using the
3 restroom. Additionally, Plaintiff and other VEA employees could hear a deputy checking his
4 Taser in a hallway before voicing to them that he was in fact checking his Taser.

5 18. Then on February 26, 2019, just four (4) days after the execution of the February 21,
6 2019 search warrant, NCSO applied for another search warrant in the Pahrump Township Justice
7 Court this time through Boruchowitz.

8 19. According to Boruchowitz, the basis for the February 26, 2019 Application and
9 Affidavit for Search Warrant was based on the following information:

- 10 • That during the February 22, 2019 investigation an alleged “street source”
11 came to him and advised that Plaintiff had VEA do approximately \$89,000
12 worth of work at her house to move power lines underground and billed them
13 to VEA;
- 14 • That the “street source” also advised the names of VEA employees who
15 knew the work was being done and that the work was done in April 2018;
- 16 • The NCSO interviewed a VEA employee named by the “street source” who
17 confirmed that the VEA work in question “was done at Angela Evan’s residence”
18 and “that traditionally the customer pays for this, but he is not involved in the
19 financial side of things, and simply could confirm the work was done”;
- 20 • A second “street source” provided a printout regarding two (2) work orders, which
21 showed that they appear to be invoiced as System Improvements. The “street
22 source” stated that the work orders in question were performed in March and April
23 2018.
- 24 • The Nye County Assessor’s Office website provided “that Angela Evans owns a
25 piece of property at 3181 E. Winery Road”; and
- The NCSO reviewed historic Google Maps images, a Nye County
“pictometry map” and photos taken at the property on February 26, 2019,
and concluded that “this property is the only residence on that block that does
not have power lines across the back easement of the property” and “[i]t
appears that the work conducted by VEA would have been to bury these lines
underground as originally reported by the street source.

24 ...
25 ...

1 20. Affiant Boruchowitz wrongfully alleged in his application that “[Plaintiff] used her
2 position as CEO to have work conducted by VEA for personal gain at her residence at the cost of
3 the Cooperative membership.” Boruchowitz also alleged documents at VEA would show “the
4 misuse of Valley Electric monies for personal gains.”

5 21. Affiant Boruchowitz also alleged that again there was probable cause that evidence
6 existed for a violation of Nevada Revised Statute NRS 205.300, Embezzlement, and that the
7 evidence was currently concealed within the VEA corporate offices.

8 22. These allegations were all unfounded, false and/or inaccurate as there was no actual
9 or valid evidence to suggest that Mrs. Evans personally committed any acts to misuse or divert
10 VEA property or money away from its intended purpose, or that she knew that the modifications
11 being completed by VEA were in any way improper and not approved in the normal course of VEA
12 policies and procedures.

13 23. Upon further information and belief, the alleged existence of probable cause
14 contained in the February 26, 2019 Application and Affidavit for Search Warrant was also
15 unfounded and false.

16 24. However, based on an incomplete and inaccurate set of facts as alleged by
17 Boruchowitz, Justice of the Peace Lisa Chamlee again found probable cause to issue another search
18 warrant at VEA.

19 25. On or about February 26, 2019, the same day that the search warrant was granted
20 and issued, NCSO executed the search warrant at VEA.

21 26. During the execution, the NCSO, without probable cause or other justification
22 arrested Plaintiff for embezzlement, and transported her to the Nye County Detention Center.

23 27. Later that day, Plaintiff was allowed to pay bail and leave the Nye County Detention
24 Center. Plaintiff was not provided with any charging document or an indictment, but was given a
25 notice to appear in Justice Court on April 29, 2019.

1 28. Additionally, at or around at 9:20 p.m. on February 26, 2019, the Sheriff's Office
2 reported the arrest on Facebook with a two (2) minute video showing Plaintiff being arrested and
3 summarizing the unfounded allegations made in the February 26, 2019 Application and Affidavit
4 for Search Warrant. The Facebook video even changed some of information that was alleged by
5 Affiant Boruchowitz in the application by changing the amount of value of work done to Plaintiff's
6 residence from \$89,000 to \$74,000.

7 29. After her unlawful arrest, VEA placed Plaintiff on administrative leave to investigate
8 and determine whether Plaintiff violated VEA policies, bylaws, the terms and conditions of their
9 employment with VEA or any state laws relating to VEA's modification of its facilities at 3181 E.
10 Winery Road (APN # 042-762-06) (Plaintiff's Property) in Pahrump, Nevada.

11 30. Plaintiff was unfortunately never allowed to return her position as CEO.

12 31. Prior to her termination, David Hall, a VEA President of the Board, encouraged her
13 to resign to "save her career" despite any findings of wrongdoing by VEA in its investigation of
14 Plaintiff.

15 32. On or about June 17, 2019, Plaintiff complained to VEA of Discrimination based on
16 her age, race, and sex. Plaintiff, pursuant to policy and good faith, reported such unlawful and
17 inappropriate actions. Plaintiff further desired to continue working as CEO.

18 33. Within eleven (11) days of receiving Plaintiff's complaint, VEA terminated her.

19 34. After almost six (6) additional months following Plaintiff's termination, which was a
20 week before Christmas in 2019, the NCSO cleared Plaintiff and stated that they would not
21 prosecute, and no charges would be brought against Plaintiff.

22 35. The affidavit by Boruchowitz for the February 26, 2019 Application and Affidavit
23 for Search Warrant contained allegations that were inaccurate, incomplete and unfounded as to the
24 existence of probable cause.

25

1 36. Defendant Boruchowitz was aware that allegations contained in his February 26,
2 2019 Application and Affidavit for Search Warrant were unfounded, inaccurate, incomplete and
3 that no there was no actual existence of probable cause before submitting the application to Justice
4 of the Peace Lisa Chamlee.

5 37. Further, these allegations were deliberately false and/or in reckless disregard for the
6 truth, which allowed and caused the unlawful search at VEA and arrest of Plaintiff to occur.

7 38. Defendant Boruchowitz also acted with intent to deprive Plaintiff of her
8 Constitutional rights, in reckless, disregard of her rights. His conduct was committed in bad faith
9 and acquiesced to by NCSO.

10 39. NCSO allowed Boruchowitz to falsely and/or recklessly apply for a search warrant
11 without actual probable cause, which allowed him to be granted and execute the February 26, 2019
12 search warrant procuring the unlawful arrest Plaintiff without probable cause or other justification.

13 40. As a result of Defendants' unconstitutional conduct, Plaintiff was unlawfully and
14 falsely arrested without probable for a crime she did not commit. Plaintiff's arrest and the wrongful
15 allegations that lead to her arrest were then publicly disseminated by Defendants to the public.
16 Plaintiff's job as CEO was also terminated.

17 41. As a further result of Defendants' unconstitutional conduct, Plaintiff has also been
18 forced to move out of her home.

19 42. Thus, Plaintiff was forced to suffer indescribable mental anguish and emotional pain
20 due to deprivation of her constitutional rights. She also has since been deprived of income and has
21 suffered severe economic harm.

22 43. Defendants violated the rights of Plaintiff by falsely arresting her without probable
23 cause or justification and by intentionally misleading and deceiving the court into granting the
24 search warrant which caused and allowed the unlawful arrest of Plaintiff to occur.

25 . . .

FIRST CLAIM FOR RELIEF

(Unreasonable Seizure – False Arrest Violation of 4th Amendment 42 U.S.C § 1983)

(Plaintiff Against All Defendants)

44. Plaintiff repeats and re-alleges the allegations of paragraphs 1 through 43 as if fully set forth herein.

45. 42 U.S.C § 1983 provides in part:

Every person who, under color of any statute, ordinance, regulation, custom, or usage of any State or Territory subjects, or causes to be subjected, any person of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws shall be liable to the party injured in an action at law, suit at equity or other proper proceeding for redress.

46. At all times relevant herein, there has been a policy, practice, and custom at NCSO to allow its officers to falsely and/or recklessly apply for search warrants without actual probable cause which empowers its officers to execute search warrants that procure unlawful arrest and unreasonable seizures of individuals without probable cause or other justification. Moreover, NCSO has a policy, practice and custom not to discipline its officers for wrongful arrest. As a result, NCSO officers feel empowered to apply for search warrants to procure the unlawful detention and false arrests individuals without probable cause or other justification. Moreover, NCSO is independently liable under 42 U.S.C. §1983 because the NCSO has fostered the practice to arrest individuals without probable cause, which caused the violations to occur in this case. These policies, practices and customs were the moving force behind the violation of Plaintiff’s rights.

47. By the actions and omissions described herein, NCSO deprived Plaintiff of her clearly established rights, including but not limited to, to be secure in her person and effects, and to be free from unreasonable search and seizure under the Fourth Amendment to the United States Constitution.

...

1 48. The aforementioned policies, practices and customs were the moving force and/or
2 proximate cause of Plaintiff's clearly-established and well-settled constitutional rights in violation of
3 42 U.S.C. §1983, as more fully set forth herein.

4 49. Defendant NCSO ordered, acquiesced in, tolerated and permitted Defendant
5 Boruchowitz to engage in the unlawful and unconstitutional violations described herein.

6 50. Plaintiff was unlawfully arrested and seized. Defendant Boruchowitz had neither
7 valid evidence for the search warrant or arrest of Plaintiff, nor legal cause, probable cause or excuse
8 to seize and detain Plaintiff.

9 51. Defendant Boruchowitz, acted under color of state law in detaining Plaintiff without
10 a fair and reliable determination of probable cause, without lawful justification, subjecting the
11 Plaintiff to false arrest, therefore depriving Plaintiff of certain constitutionally protected rights,
12 including but not limited to:

- 13 a. The right to be free from unreasonable seizures and unlawful arrests by law
14 enforcement officers as guaranteed by the Fourth Amendments to the United States
15 Constitution.
- 16 b. The right to be secure in his person and effects as guaranteed by the Fourth
17 Amendment to the United States Constitution.

18 52. That as the proximate result of the Defendants' wrongful and unlawful conduct as
19 alleged herein, Plaintiff suffered a violation of her rights, lost earnings, mental anguish, emotional
20 harm, and pain and suffering.

21 53. Defendant Boruchowitz, as a duly appointed, qualified and acting officer of NCSO,
22 acting within the course and scope of such employment, knowingly, and with conscious and reckless
23 disregard, violated the rights conferred upon Plaintiff by the Fourth Amendment by subjecting
24 Plaintiff to NCSO's unconstitutional policies, practices, and customs described herein.

25 54. At all times relevant herein, Defendant Boruchowitz was performing his duties as
officer for NCSO.

1 because NCSO has fostered the practice to allow its officers to submit to judges warrant affidavits
2 that contain misrepresentations and omissions to the finding of probable cause, which caused the
3 violations to occur in this case.

4 62. By the actions and omissions described herein, NCSO deprived Plaintiff of her
5 clearly established rights, including but not limited to, to be free from unreasonable searches under
6 the Fourth Amendment to the United States Constitution.

7 63. The aforementioned policies, practices and customs were a moving force and/or
8 proximate cause of Plaintiff's clearly-established and well-settled constitutional rights in violation of
9 42 U.S.C. §1983, as set forth more fully herein.

10 64. ~~Defendant~~—NCSO ordered, acquiesced in, tolerated and permitted Defendant
11 Boruchowitz to engage in the unlawful and unconstitutional violations described herein.

12 65. Plaintiff was unlawfully searched. Defendant Boruchowitz submitted to Justice of
13 Peace Lisa Chamlee a warrant affidavit on February 26, 2019 that contained one and/or more
14 misrepresentations or omissions material to the finding of probable cause.

15 66. Defendant Boruchowitz made those misrepresentations and/or omissions either
16 intentionally or with reckless disregard for the truth, which was highly unreasonable conduct that
17 was an extreme departure from ordinary care, presenting a danger of misleading a reasonable judge
18 into concluding that probable cause has been established as that danger was either known to
19 Defendant Boruchowitz and/or was so obvious that Defendant Boruchowitz must have been aware
20 of it.

21 67. Justice of the Peace Lisa Chamlee would not have issued the warrant if the false
22 information had been excluded and/or if the omitted or missing information had been included.

23 68. Defendant Boruchowitz, acted under color of state law in submitting the warrant to
24 Justice of the Peace Lisa Chamlee, which contained one or more misrepresentations and/or
25 omissions material to finding of probable cause which were made intentionally and/or with reckless

1 disregard for the truth, subjecting the Plaintiff to an unreasonable search, therefore depriving
2 Plaintiff of certain constitutionally protected rights, including but not limited to, to be secure in her
3 person and effects, and to be free from unreasonable seizure under the Fourth Amendment to the
4 United States Constitution.

5 69. That as the proximate result of the Defendants' wrongful and unlawful conduct as
6 alleged herein, Plaintiff suffered mental anguish, emotional harm, and pain and suffering.

7 70. Defendant Boruchowitz, as a duly appointed, qualified and acting officer of the
8 NCSO, acting within the course and scope of such employment with the NCSO knowingly,
9 maliciously, and with conscious and reckless disregard, violated the rights conferred upon Plaintiff
10 by the Fourth Amendment by subjecting Plaintiff to NCSO's unconstitutional policies, practices, and
11 customs described herein.

12 71. At all times relevant herein, Defendant Boruchowitz was performing his duties as
13 officer for the NSCO.

14 72. During the relevant period, the Defendant Boruchowitz was acting under color of
15 law, to wit: under color of statutes, ordinances, regulations, customs and usages of the State of
16 Nevada. As a result of his misconduct, Defendant Boruchowitz is all liable to the Plaintiff for the
17 injuries and damages because he was an integral participant in the judicial deception that caused the
18 unreasonable search of Plaintiff.

19 73. That the wrongful and unlawful acts perpetrated by the Defendants and each of
20 them, were performed with a disregard of the well-established and constitutionally protected rights
21 of Plaintiff.

22 74. Plaintiff had firmly established rights under the Fourth Amendment to be free from
23 unreasonable searches.

24 75. Plaintiff was subjected to humiliation, fear, mental injury, and pain and suffering by
25 the illegal acts of Defendants and is entitled to compensatory damages.

1 76. As a result of Defendants' actions, it has been necessary for Plaintiff to retain an
2 attorney to prosecute this action.

3 **THIRD CLAIM FOR RELIEF**

4 *(False Arrest)*

5 *Plaintiff Against All Defendants*

6 77. Plaintiff repeats and re-alleges the allegations of paragraphs 1 through 76 as if fully
7 set forth herein.

8 78. On February 26, 2019, NCSO, by and through Defendant Boruchowitz, intentionally
9 and forcefully took Plaintiff into custody.

10 79. Defendants lacked any probable cause to Plaintiff.

11 80. The custody was against the Plaintiff's will.

12 81. A reasonable person in Plaintiff's position would not have felt free to leave.

13 82. Additionally, Defendants' acts as described herein directly or indirectly resulted in
14 Plaintiff being confined.

15 83. As a result of Defendants' intentional acts as described herein, Plaintiff was
16 conscious of the confinement and was harmed by the confinement.

17 84. NCSO is vicariously liable for the actions of Defendant Boruchowitz as described
18 herein under a theory of *respondeat superior*.

19 85. As direct and proximate result of Defendants false arrest of Plaintiff, Plaintiff has
20 suffered damages for injury to feelings, humiliation, indignity and disgrace to the person, physical
21 suffering, mental suffering, and injury to health. As a result, Plaintiff is entitled to compensation in
22 excess of \$15,000.00 for being falsely arrested.

23 ...

24 ...

25 ...

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests entry of judgment in his favor and against Defendants as follows:

1. For judgment in favor of Plaintiff on all counts;
2. For compensatory damages to be proven at trial;
3. For compensatory and special damages in excess of \$15,000.00;
4. For pre- and post-judgment interest at the maximum legal rate;
5. For costs and attorney fees incurred in prosecuting this action in accordance with 42 U.S.C. § 1988; and
6. For such further relief as the Court may deem just, proper, and appropriate.

DATED this ____ day of **June**, 2021.

RESPECTFULLY SUBMITTED,

LAGOMARSINO LAW

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DEMAND FOR TRIAL BY JURY

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure and Local Rule 38-1,
Plaintiff demands a trial by jury on all issues in this action.

DATED this ____ day of **June**, 2021.

RESPECTFULLY SUBMITTED,

LAGOMARSINO LAW

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CERTIFICATE OF SERVICE

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Pursuant to FRCP 5(b), I hereby certify that on this _____ day of **June**, 2021, I served a true copy of the foregoing **PLAINTIFF’S FIRST AMENDED COMPLAINT** on all parties to this action by electronic service, via CM/ECF, to the following:

Case No.: 2:20-cv-01919-RFB-VCF

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& David Boruchowitz*

Case No. 2:20-cv-00986-RFB-VCF

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