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**DISTRICT COURT**  
**CLARK COUNTY NEVADA**

AMANDA MARIE VAN ALLEN NEWTON,  
as Personal Representative In the Matter of  
Estate of JOHNNY EUGENE VAN ALLEN,  
deceased; and THERESA L. VAN ALLEN  
individually,

Case No.  
Dept. No.

Plaintiffs,

vs.

**COMPLAINT**

CAESARS ENTERTAINMENT  
CORPORATION a Delaware Foreign  
Corporation d/b/a RIO ALL-SUITE HOTEL  
AND CASINO; DOES I through X, and ROE  
CORPORATIONS I through X, inclusive,

Defendants.

COME NOW Plaintiffs, AMANDA MARIE VAN ALLEN NEWTON, as Personal  
Representative In the Matter of Estate of JOHNNY EUGENE VAN ALLEN, deceased; and  
THERESA L. VAN ALLEN, individually, by and through their attorneys of record, Benson &  
Bingham, and for causes of action against Defendants, and each of them, alleges and complains as  
follows:

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**NATURE OF THE CASE**

1  
2 1. This is an action brought against Defendant CEASARS ENTERTAINMENT  
3 CORPORATION which owns, manages and/or operates and does business as the RIO ALL-SUITE  
4 HOTEL AND CASINO ("RIO") located in Las Vegas, Nevada (hereinafter "Defendant") for  
5 having breached the duty owed to its patrons to ensure that its premises, specifically its water  
6 systems, were safe for use. At all times mentioned herein, The RIO failed to take the precautions  
7 necessary to ensure that its water systems were not infected with the Legionella Pneumophila  
8 bacteria (hereinafter "bacteria"), which causes a potentially deadly disease known as Legionnaires  
9 Disease.  
10

11 2. Upon information and belief, the RIO failed to disclose to its hotel guests, including  
12 Plaintiffs, the material and important fact the hotel's water system was infected with the legionella  
13 bacteria. Defendant was effectively on notice of the existence of the bacteria, and/or, the potential  
14 for contamination of their water systems, yet Defendant either completely disregarded the potential  
15 danger, or simply did not take the steps necessary to warn its guests and prevent them from  
16 contracting the disease. Despite Defendant's knowledge that legionella bacteria had infected the  
17 hotel's water system Defendant continued to book reservations and rent rooms to thousands, if not  
18 tens of thousands of guests all while never saying a word to any of them about the presence of the  
19 legionella bacteria. See Southern Nevada Health District Report and Notice of Inspection dated  
20 May 3, 2017, attached hereto as Exhibit 1.  
21

22 3. Defendant concealed from and /or failed to disclose this material fact to all guests,  
23 including Plaintiffs, when it made and accepted room reservations to stay at the RIO hotel and/or  
24 when guests checked into the hotel and/or while guests were staying at the hotel. Instead of  
25 disclosing to guests the fact the hotel's water system was infected or potentially infected with  
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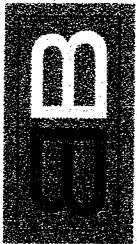
1 legionella bacteria Defendant chose to roll the dice hoping none of their guests would find out or  
2 learn of the presence of legionella bacteria in the water system and take their business to another  
3 hotel/casino in Las Vegas. Rather than disclose to its guests the material fact the RIO's water  
4 system was infected with legionella bacteria Defendant chose to wage the potential health of its  
5 guests against its odds of realizing multiple-millions of dollars in revenue from gambling, room  
6 reservations, and good and beverage sales.

7  
8 4. Legionnaires' disease is a form of atypical pneumonia caused by any type of  
9 Legionella bacteria. Signs and symptoms include cough, shortness of breath, high fever, muscle  
10 pains, and headaches. Nausea, vomiting, and diarrhea may also occur. This often begins two to  
11 fourteen days after being exposed. The bacterium is found naturally in fresh water. It can  
12 contaminate hot water tanks, hot tubs, and cooling towers of large air conditioners. It is usually  
13 spread by breathing in mist that contains the bacteria. It can also occur when contaminated water is  
14 aspirated. It typically does not spread directly between people and most people who are exposed do  
15 not become infected. Risk factors for infection include older age, history of smoking, chronic lung  
16 disease, and poor immune function.

17  
18 5. As a result of Defendant's blatant disregard for its patron's safety, Johnny Eugene  
19 Van Allen, contracted Legionnaire's Disease while staying at the RIO. Mr. Van Allen died as an  
20 unfortunate consequence of the complications associated with Legionnaire's Disease.

### 21 HISTORY OF THE CASE

22  
23 6. Between the months of March through May, 2017, The Southern Nevada Health  
24 District received reports of individuals who had developed Legionnaires Disease while staying at  
25 the RIO. In response to these initial illness reports, environmental testing of RIO's water systems  
26 was conducted on May 24, 2017. The facility testing results did indicate a presence of  
27

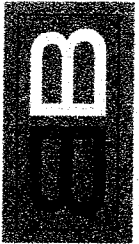


1 the *Legionella* bacteria. Attached hereto as Exhibit "2" is a true and correct copy of the public  
2 notice that was released on June 9, 2017, by the Southern Nevada Health District, regarding the  
3 presence of the *Legionella* bacteria at the RIO.

4 7. Upon information and belief, during the month of May, 2017, the water systems at  
5 the RIO were contaminated with the *Legionella* bacteria, as demonstrated by the testing that was  
6 done by the Southern Nevada Health District. Defendant was aware of this fact but concealed from  
7 and/or failed to disclose this fact to Plaintiffs and other guests when it made and accepted room  
8 reservations to stay at the RIO hotel. At all times mentioned herein, particularly on or about May 14  
9 through May 16, 2017, Plaintiff, Theresa Van Allen and her spouse Johnny Van Allen, stayed at the  
10 Rio Hotel & Casino in Las Vegas, Nevada as guests of the hotel. Specifically, they stayed in the  
11 Ipanema Tower, Room 408.

12 8. Following their stay at the RIO, Johnny and Theresa returned home to Arizona. On  
13 May 29, 2017, both individuals sought medical treatment at Banner Urgent Care, as they had  
14 become extremely ill and were exhibiting flu like symptoms. Johnny was diagnosed with Sinus &  
15 Upper Respiratory Infection and Theresa was diagnosed with Pneumonia. On June 1, 2017, Johnny  
16 was tested for the flu. On June 6, 2017, a CT of Johnny's chest was ordered and conducted at  
17 Marquis imaging. On June 13, 2017, Johnny went into cardiac arrest and could not be resuscitated,  
18 subsequently Johnny passed away. His immediate cause of Death, as listed on his Certificate of  
19 Death, was Acute Myocardial Infarction. Attached hereto as "Exhibit 3" is a true and correct copy  
20 of Johnny's Certificate of Death.

21 9. On June 06, 2017, the SNHD finalized its report on the aforementioned testing of the  
22 RIO's water systems, confirming the existence of the bacteria. It was not until June 22, 2017,  
23 however, that Defendant sent notice regarding the presence and safety risks imposed by  
24



1 Legionnaire's Disease to, presumably, every registered guest of the RIO during the time the  
2 bacteria was present in the hotel's water system. The same was sent to Plaintiffs, advising them to  
3 seek medical treatment if they experienced symptoms of Legionnaire's disease within 14 days of  
4 their stay at the RIO. Attached hereto as Exhibit "4" is a true and correct copy of the letter, sent to  
5 Plaintiffs from Defendants.

6  
7 10. On July 13, 2017, Theresa received and read the letter that had been sent by  
8 Defendant RIO on June 22, 2017. Unfortunately, the letter had been sent too late, as Johnny had  
9 passed away 9 days prior to the sending of the letter.

10 11. On August 8, 2017, Cadaver Serum that had been extracted from Johnny's body on  
11 or around the time of his death was transferred from Donor Network of Arizona to Patient's Choice  
12 Labs for testing to determine whether the existence of bacteria was present in Johnny's system  
13 when he passed away. On August 21, 2017, results from Patient's Choice Labs showed that Johnny  
14 had tested positively for Legionnaires Pneumophila.

15  
16 12. Upon information and belief, Plaintiffs alleges that Johnny's untimely death was  
17 caused and is directly related to having contracted Legionnaires Disease during his stay with the  
18 RIO on May 14 through 16, 2017.

19  
20 **JURISDICTION**

21 13. At all times mentioned herein, Plaintiff AMANDA MARIE VAN ALLEN  
22 NEWTON, as Personal Representative In the Matter of Estate of JOHNNY EUGENE VAN  
23 ALLEN, was and is a resident of the County of the Maricopa, State of Arizona.

24 14. At all times mentioned herein, Plaintiff, THERESA L. VAN ALLEN (hereinafter  
25 referred to as "Plaintiff" or "Ms. Van Allen"), was and is a resident of the County of Maricopa,  
26 State of Arizona.

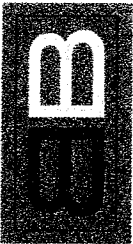
1           15.     Upon information and belief, at all times mentioned herein, Defendant CAESARS  
2 ENTERTAINMENT CORPORATION, d/b/a RIO ALL-SUITE HOTEL AND CASIO (hereinafter  
3 “Defendant CAESARS”) was and is a Delaware Foreign Corporation doing business in of the  
4 County of Clark, State of Nevada.

5           16.     That the true names and capacities, whether individual, corporate, associate or  
6 otherwise, of Defendants DOES I-X and ROE CORPORATIONS I-X, inclusive, are unknown to  
7 the Plaintiff, who therefore sues said Defendants by such fictitious names. The Plaintiffs are  
8 informed, believe and thereon allege that each of the Defendants designated herein as a DOE or a  
9 ROE CORPORATION is negligently, vicariously, statutorily, contractually, and/or otherwise  
10 responsible in some manner for the events of cleaning, maintenance, testing, inspection, repair,  
11 design or failure to warn which caused the formation of Legionella bacteria on the premises of the  
12 Rio Hotel to which Plaintiffs were exposed, and by which they were injured. The Plaintiffs will  
13 ask leave of the Court to amend this Complaint to insert the true names and capacities of said  
14 Defendants, DOES I-X and ROE CORPORATIONS I-X, inclusive, when the same have been  
15 ascertained by the Plaintiffs, together with appropriate charging allegations, and to join said  
16 Defendants in this action.

17  
18  
19                               **GENERAL ALLEGATIONS**

20           17.     The Plaintiffs repeat and reallege each and every allegation contained in paragraphs  
21 1 through 16 and incorporates the same by reference as though fully set forth herein.

22  
23           18.     At all times mentioned herein, particularly on or about May 14 through May 16,  
24 2017, Theresa Van Allen and her spouse Johnny Van Allen, stayed at the RIO in Las Vegas,  
25 Nevada as guests of the hotel. Specifically, they stayed in the Ipanema Tower, Room 408.



1           19.     At all times mentioned herein, the bacterium *Legionella phenophila* was present in  
2 the water systems at the Rio Hotel & Casino, including the Ipanema tower where the Van Allen's  
3 stayed. Evidence of the existence of the bacterium in the Rio's water systems is demonstrated by  
4 tests that were conducted by the Southern Nevada Health District on May 24, 2017. These tests  
5 yielded positive results for the presence of the *Legionella phenophila* bacterium.

6  
7           20.     During his stay at the Rio, Johnny Van Allen availed himself of the use of the  
8 shower, faucets, and other water systems in the hotel. The water was, at the time, heated, causing  
9 the water to steam, vaporize and otherwise become aerosolized, allowing it to be inhaled and  
10 ingested by Johnny Van Allen.

11           21.     Upon information and belief, Johnny Van Allen acquired Legionnaires' disease at  
12 the RIO, as a result of which he became seriously ill, incurred significant medical bills, and endured  
13 significant pain and suffering before he ultimately passed away on June 13, 2017.

14           22.     Further testing and analysis conducted by the Southern Nevada Health Department  
15 (SNHD) linked decedent Plaintiff Jonny Van Allen's particular strain of *Legionella* bacteria to the  
16 Rio Hotel.

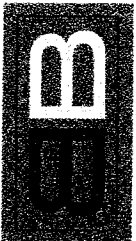
17  
18                               **FIRST CAUSE OF ACTION**  
19                               **(NEGLIGENCE)**

20           23.     The Plaintiffs repeat and reallege each and every allegation contained in paragraphs  
21 1 through 22 and incorporates the same by reference as though fully set forth herein.

22           24.     As owner and operator of the premises, defendant was responsible for the inspection,  
23 repair, cleaning and maintenance of its heating, hot water, ventilation, internal and external spas and  
24 hot tubs and air conditioning systems at its premises (hereinafter "systems") and for all of its  
25 operating systems, particularly those systems which affected its invitees.  
26  
27  
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g. In failing to perform and furnish services in conformity with the standard of care then and there prevailing in the hotel industry when such service would have disclosed the presence of legionella;





h. In failing to have in force an inspection program of its systems when such inspection would have disclosed the presence of legionella;

i. In failing to take any appropriate action to correct the presence of legionella after it was notified of the presence of legionella at its premises;

j. In breaching its duty to provide a reasonably safe environment for its invitees;

k. Was otherwise negligent in a manner not now known but which may become known prior to or at the time of trial.

27. As a proximate cause of the Defendant's breach of its duty to the Plaintiffs, the Plaintiffs, have sustained serious injuries as alleged above.

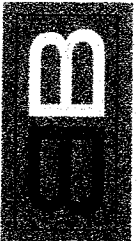
28. As a direct and proximate result of Defendant's aforesaid actions, Plaintiffs have incurred and continue to incur emotional distress, pain and suffering, loss of enjoyment of life, medical expenses, loss of household income, loss of companionship, care and consortium all to Plaintiffs' general damages in an amount in excess of Ten Thousand Dollars (\$10,000.00).

29. As a direct and proximate result of Defendant's aforesaid actions, it has been necessary for Plaintiffs to retain the law firm of BENSON & BINGHAM to prosecute this action, and Plaintiffs are entitled to recover reasonable attorneys' fees and costs.

**SECOND CAUSE OF ACTION**  
**Violation of Nevada Revised Statue 205.377**  
**[Multiple Transactions Involving Fraud or Deceit]**

30. Plaintiffs repeat and reallege each and every allegation contained in Paragraphs 1 through 29 and incorporate the same by reference as though fully set forth herein.

31. Plaintiffs allege Defendant's actions and conduct as herein alleged constitutes violations of Nevada revised Statue 205.377 which provides: (1) A person shall not, in the course of an enterprise or occupation, knowingly and with the intent to defraud, engage in an act, practice or



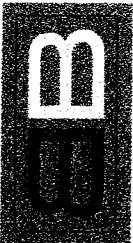
1 course of business or employ a devise, scheme or artifice which operates or would operate as fraud  
2 or deceit upon a person by means of a false representation or omission of a material fact that: (a) the  
3 person knows to be false or omitted; (b) The person intends another to rely on; and (c) Results in a  
4 loss to any person who relied on the false representation or omission, in at least two transactions  
5 that have the same or similar pattern, intents, results, accomplices, victims or methods of  
6 commission, or are otherwise interrelated by distinguishing characteristics and are not isolated  
7 incidents within 4 years and in which the aggregate loss or intended loss is more than \$650.

8  
9 32. Pursuant to NRS 208.80, the provisions of NRS 205.377 apply to Defendant because  
10 Defendant is a corporation.

11 33. Plaintiffs allege Defendant concealed and/or omitted from disclosing to Plaintiffs  
12 and other hotel guests the fact that legionella bacteria was present in the RIO's water system during  
13 their stay at the hotel. Plaintiffs allege the presence of legionella bacteria in the hotel's water  
14 system was a material fact which she and other hotel guests would reasonably rely upon in making  
15 the decision whether to stay at the RIO at all, or alternatively, whether the quoted room rate was a  
16 fair and reasonable rate to pay for a room in a hotel which has legionella bacteria in the water  
17 system which exposes people to serious illness.

18  
19 34. Plaintiffs allege she relied justifiably on Defendant's concealment/omission when  
20 Plaintiff Theresa and her spouse Johnny Eugene Van Allen stayed at the RIO and parted with their  
21 money by paying Defendant the demanded amount for the guest room in which Plaintiffs stayed  
22 (the "room rate").

23  
24 35. Plaintiffs allege that since Defendant concealed and/or omitted from disclosing to  
25 Plaintiff Theresa and her spouse Johnny Eugene Van Allen the material fact of the presence of  
26 legionella bacteria in the RIO's water system it is reasonable to infer that all guests who stayed at  
27



the RIO during the time legionella bacteria was in the water system and paid Defendant the demand room rate for their guest rooms relied reasonably on Defendant's concealment/omission.

36. Plaintiffs allege Defendant engaged in multiple acts of concealment/omission in violation of NRS 205.377, between at least May 14, 2017, when Defendant concealed/omitted from disclosure to guests registering and/or staying at the RIO the presence of legionella bacteria in the hotel's water system.

37. Defendant's actions displayed a reckless disregard for their likely effects on the Plaintiff justifying an award of punitive damages.

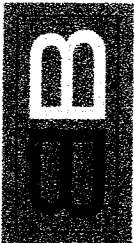
38. As a direct and proximate result of Defendant's aforesaid actions, Plaintiffs have incurred and continue to incur emotional distress, pain and suffering, loss of enjoyment of life, medical expenses, loss of household income, loss of companionship, care and consortium all to Plaintiffs' general damages in an amount in excess of Ten Thousand Dollars (\$10,000.00).

39. As a direct and proximate result of Defendant's aforesaid actions, it has been necessary for Plaintiffs to retain the law firm of BENSON & BINGHAM to prosecute this action, and Plaintiffs are entitled to recover reasonable attorneys' fees and costs.

40. Pursuant to NRS 205.377, in addition to any other penalty that may be assessed the court shall order a person who violates subsection 1 to pay restitution. Plaintiffs are therefore entitled to restitution in an amount according to proof at trial.

**THIRD CAUSE OF ACTION**  
**Violation of Nevada Deceptive Trade Practice Act (NDTPA)**  
**[NRS 41.600, NRS 598.0923(2)]**

41. Plaintiffs repeat and reallege each and every allegation contained in Paragraphs 1 through 40 and incorporates the same herein by reference as though fully set forth herein.



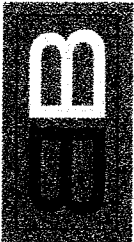
1           42. Plaintiffs bring this cause of action in accordance with NRS 41.600 [Actions by  
2 victims of fraud], and specifically NRS 41.600(2)(e), for violations of Nevada Deceptive Trade  
3 Practices Act. Plaintiffs allege Defendant violated the provisions of NRS 598.0923(2) by  
4 concealing/omitting from disclosure and/or failing to disclose a material fact in connection with the  
5 sale or lease of goods or services.

6  
7           43. Plaintiffs allege Defendant concealed/omitted from disclosure and/or failed to  
8 disclose the presence of legionella bacteria in the RIO's water system while Plaintiff and all other  
9 members of the class stayed at the hotel.

10           44. Plaintiffs allege Defendant concealed and/or omitted from disclosing to Plaintiff,  
11 Theresa Van Allen and her spouse, Johnny Eugene Van Allen the fact legionella bacteria was  
12 present in the RIO's water system during their stay at the hotel. Plaintiffs allege the presence of  
13 legionella bacteria in the hotel's water system was a material fact which she and her spouse Johnny  
14 Eugene Van Allen would reasonably rely upon in making the decision whether to stay at the RIO at  
15 all, or alternatively, whether the quoted room rate was a fair and reasonable rate to pay for a room  
16 in a hotel which has legionella bacteria in the water system which exposes people to serious illness.

17  
18           45. Plaintiff Theresa Van Allen alleges that she relied justifiably on Defendant's  
19 concealment/omission when she and her spouse Johnny Van Allen stayed at the RIO and parted  
20 with their money by paying Defendant the demanded amount for the guest room in which Plaintiffs  
21 stayed (the "room rate").

22  
23           46. Plaintiff Theresa Van Allen alleges that since Defendant concealed and/or omitted  
24 from disclosing to her and her spouse Johnny Van Allen the material fact of the presence of  
25 legionella bacteria in the RIO's water system it is reasonable to infer that all guests who stayed at  
26



1 the RIO during the time legionella bacteria was in the water system and paid Defendant the  
2 demanded room rate for their guest rooms relied reasonably on Defendant's concealment/omission.

3 47. Plaintiffs allege Defendant engaged in multiple acts of concealment/omission  
4 between at least May 14, 2017 and June 12, 2017 when Defendant concealed/omitted from  
5 disclosure to guests registering and/or staying at the RIO the presence of legionella bacteria in the  
6 hotel's water system.  
7

8 48. As a direct and proximate result of Defendant's aforesaid actions, Plaintiffs have  
9 incurred and continues to incur emotional distress, pain and suffering, loss of enjoyment of life,  
10 medical expenses, loss of household income, loss of companionship, care and consortium all to  
11 Plaintiffs' general damages in an amount in excess of Ten Thousand Dollars (\$10,000.00).  
12

13 49. As a direct and proximate result of Defendant's aforesaid actions, it has been  
14 necessary for Plaintiffs to retain the law firm of BENSON & BINGHAM to prosecute this action,  
15 and Plaintiffs are entitled to recover reasonable attorneys' fees and costs.

16 50. Plaintiffs further alleges the actions and conduct of Defendant as herein alleged  
17 where fraudulent, oppressive and malicious in that they were carried out with a knowing, willful,  
18 purposeful, and intentional disregard for the rights and/or safety of all Defendant's guests.  
19 Defendant chose to wager the potential health of its guests against its odds of realizing multiple-  
20 millions of dollars in revenue from gambling, room reservations, and food and beverage sales. As  
21 such, Plaintiffs are entitled to an award of punitive or exemplary damages against Defendant in an  
22 amount according to proof so as to punish and/or make an example of Defendant for other business  
23 in the hospitality industry and to prevent future similar wrongdoing.  
24

25 //

26 //

**FOURTH CAUSE OF ACTION**  
**(Recklessness)**

51. Plaintiffs repeat and reallege each and every allegation contained in Paragraphs 1 through 50 and incorporates the same herein by reference as though fully set forth herein verbatim.

52. Defendant understood or should have understood the risks of not inspecting, repairing, cleaning, testing, and/or maintaining its heating, hot water, ventilation, internal and external spas and hot tubs and air conditioning systems at its premises (hereinafter "systems") and for all of its operating systems, particularly those systems which affected its invitees.

53. Defendants were owners, employers and/or trained employees and professionals and understood the risks of concealing and/or omitting from disclosing to Plaintiffs and other hotel guests the fact that legionella bacteria was present in the RIO's water system during their stay at the hotel.

54. Recklessness is the assumption and/or disregard of a known risk. Defendants failed to inspect, repair, and/or maintain its system and/or warn Plaintiff and other hotel guests of the legionella bacteria present in the RIO's water system, thereby Defendants unnecessarily and deliberately endangered the life of the Plaintiff and other hotel guests.

55. Defendant RIO knew or should have known of the potential risk of harm to others by the reckless behavior of Defendant which was to the detriment of Plaintiff.

56. The actions of Defendant amounted to an indifference to the potential consequences and was a reckless disregard for the safety of others, including Plaintiffs to whom they owed a duty of care.

57. Defendant's actions displayed a reckless disregard for their likely effects on the Plaintiffs justifying an award of punitive damages.



59. As a direct and proximate result of Defendant's aforesaid actions, it has been necessary for Plaintiffs to retain the law firm of BENSON & BINGHAM to prosecute this action, and Plaintiffs are entitled to recover reasonable attorneys' fees and costs.

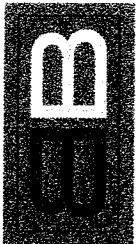
60. Plaintiffs repeat and reallege each and every allegation contained in Paragraphs 1 through 59 and incorporates the same herein by reference as though fully set forth herein verbatim.

61. At all times mentioned herein, Plaintiff Theresa L. Van Allen and Johnny Eugene Van Allen were husband and wife.

62. As a direct and proximate result of the negligence of the Defendant, Plaintiff Theresa L. Van Allen has lost the care, support, solace companionship, affection, and society of her husband, all of which has caused and will continue to cause her anguish, all to her damages in an amount in excess of Ten Thousand Dollars (\$10,000.00).

63. As a direct and proximate result of Defendant's aforesaid actions, it has been necessary for Plaintiff, Theresa Van Allen to retain the law firm of BENSON & BINGHAM to prosecute this action, and Plaintiff, Theresa Van Allen is entitled to recover reasonable attorneys' fees and costs.

64. As a direct and proximate result of the negligence, carelessness, and recklessness of the Defendant's, the Plaintiffs were injured in their health, strength and activity, sustained shock and injury to their person, incurred medical expenses and incurred and continues to incur emotional



1 distress, pain and suffering, loss of enjoyment of life, loss of household income, loss of  
2 companionship, care and consortium, all of which has caused and will continue to cause Plaintiffs  
3 pain and suffering, all to Plaintiffs' damages in an amount in excess of Ten Thousand Dollars  
4 (\$10,000.00).

5  
6 65. As a direct and proximate result of the negligence, carelessness, and recklessness of  
7 the Defendant, it has been necessary for the Plaintiffs to retain services of an attorney to prosecute  
8 this action, and the Plaintiffs are entitled to recover reasonable attorney's fees together with the  
9 costs of suit incurred herein.

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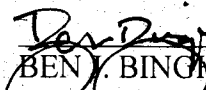
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WHEREFORE, the Plaintiffs pray for relief against the Defendants, as follows:

1. For general damages in an amount in excess of Seventy-Five Thousand Dollars (\$75,000.00);
2. For special damages in an amount in excess of Seventy-Five Thousand Dollars (\$75,000.00);
3. For an award of punitive or exemplary damages against Defendant in amount according to proof so as to punish and/or make an example of Defendant for other business in the hospitality industry and to prevent future similar wrongdoing; this applies to the intentional conduct of fraud and recklessness.
4. For wage loss damages in an amount to be ascertained;
5. For prejudgment interest;
6. For reasonable attorney's fees and costs of suit; and
7. For such other and further relief as the Court may deem just and proper.

DATED this 27 day of April, 2018.

  
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