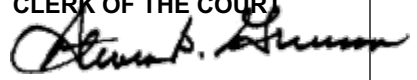


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Steven D. Grierson
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1 **COMD**
2 Jason Naimi, Esq.
3 Nevada Bar No. 9441
4 NAIMI MULLINS LAW GROUP
5 efile@naimilaw.com
6 10000 W. Charleston Blvd., Suite 160
7 Las Vegas, Nevada 89135
8 Telephone: 702.901.4800
9 *Attorneys for Plaintiff*

6 **DISTRICT COURT, FAMILY DIVISION**
7 **CLARK COUNTY, NEVADA**

8 AARON GOODWIN,

CASE NO: D-25-705892-D

9 Plaintiff,

DEPT. NO.: C

10 vs.

11 VICTORIA LYNN GOODWIN,

12 Defendant.

13 **COMPLAINT FOR DIVORCE**

14
15 COMES NOW Plaintiff, AARON GOODWIN (hereinafter "Husband"), by and
16 through his counsel of record, Jason Naimi, Esq. of Naimi Mullins Law Group, as and
17 for his Complaint for Divorce against Defendant, VICTORIA LYNN GOODWIN
18 (hereinafter "Wife"), alleges as follows:

19 **FIRST CAUSE OF ACTION**

20 **Divorce**

21 1. That Husband, for a period of more than six (6) weeks immediately
22 preceding the commencement of this action has been, and now is, an actual, bona fide
23 and actual resident and domiciliary of the State of Nevada, County of Clark, and has
24 been actually physically and corporeally present and domiciled in Nevada for more
25 than six (6) weeks immediately prior to the commencement of this action, and has had
26 and still has the intent to make the State of Nevada his home, residence and domicile
27 for an indefinite period of time.
28

NAIMI MULLINS LAW GROUP
10000 W. Charleston Blvd., Suite 160 Las Vegas, NV 89135
Telephone: 702.901.4800

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10000 W. Charleston Blvd., Suite 160 Las Vegas, NV 89135
Telephone: 702.901.4800

1 2. That Wife and Husband were duly and legally married on or about May
2 4, 2020, in Las Vegas, Nevada and have been and still are husband and wife.

3 3. That there are no children born the issue of this marriage, and Wife is not
4 pregnant at this time. No children were adopted during this marriage by Wife and/or
5 Husband.

6 4. Neither party should be awarded alimony from the other.

7 5. That there are community assets and debts of the parties, which should be
8 equally divided between the parties in accordance with Nevada law. Husband prays
9 leave of Court to plead the precise description of such assets and debts at the time of
10 trial in this matter, or at such earlier date when such information becomes known to
11 him.

12 6. That the separate assets and debts of Husband be confirmed to Husband
13 as his sole and separate property or debt as the case may be.

14 7. That the separate assets and debts of Wife be confirmed to Wife as her
15 sole and separate property or debt as the case may be.

16 8. That in the event either party has or will engage in acts individually or
17 together with others that may constitute material waste of community assets, the Court
18 should make an unequal division as is necessary to compensate the other party for
19 such community waste pursuant to Nevada law.

20 9. That the Court confirm the Joint Preliminary Injunction issued herein and
21 enjoin the parties from transferring, encumbering, concealing, selling or otherwise
22 disposing of any of their joint, common or community property interest, except in the
23 usual course of business or for the necessities of life, without the written consent of
24 both parties or the permission of the Court.

25 10. That Husband has been required to retain the services of Naimi Mullins
26 Law Group to prosecute this action and should be awarded his reasonable costs,
27 expenses and attorney's fees incurred herein.
28

NAIMI MULLINS LAW GROUP
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FOURTH CAUSE OF ACTION

Negligent Infliction of Emotional Distress

21. Plaintiff hereby incorporates by reference each and every allegation contained in Paragraphs 1 through 20 set forth above, as if fully set forth in this second cause of action.

22. Defendant acted negligently by failing to exercise reasonable care under the circumstances;

23. Plaintiff suffered severe or extreme emotional distress as the actual or proximate result of Defendant’s conduct.

24. Defendant could have foreseen that her actions would cause or substantial factor in Plaintiff’s emotional distress.

25. Plaintiff suffered punitive and exemplary damages in an amount in excess of \$10,000.00.

FIFTH CAUSE OF ACTION

Assault

26. Plaintiff hereby incorporates by reference each and every allegation contained in Paragraphs 1 through 25 set forth above, as if fully set forth in this second cause of action.

27. Defendant caused plaintiff to feel apprehension of harmful or offensive behavior.

SIXTH CAUSE OF ACTION

False Imprisonment

28. Plaintiff hereby incorporates by reference each and every allegation contained in Paragraphs 1 through 27 set forth above, as if fully set forth in this second cause of action.

29. Defendant acted intending to confine Plaintiff within boundaries fixed by Defendant

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Telephone: 702.901.4800

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30. Defendant’s act directly or resulted in such a confinement of Plaintiff;
and

31. Plaintiff was conscious of the confinement or was harmed by it.

SEVENTH CAUSE OF ACTION

Concert of Actions

32. Plaintiff hereby incorporates by reference each and every allegation contained in Paragraphs 1 through 31 set forth above, as if fully set forth in this second cause of action.

33. Defendant acted with another, or Defendant acted together, to commit a tort while acting in concert or pursuant to a common design.

WHEREFORE, Husband prays for Judgment as follows:

AS AND FOR PLAINTIFF’S FIRST CAUSE OF ACTION:

1. That the bonds of matrimony now and heretofore existing between Husband and Wife be dissolved, set aside and held for naught, and that Husband be granted an absolute decree of divorce from Wife, and that the parties hereto, and each of them, be restored to their single status;

2. That neither party be awarded alimony from the other;

3. That the community and/or jointly held assets and debts of the parties be divided by the Court in accordance with Nevada law;

4. That the separate property and debts of Husband be conferred to Husband and his sole and separate property or debt; that the separate assets and debts of Wife be confirmed to Wife as her sole and separate property or debt.

5. That Husband be reimbursed for any and all waste of community assets;

6. That the Joint Preliminary Injunction be confirmed as an Order of the Court;

7. That Husband be awarded his reasonable attorney’s fees and costs incurred herein; and

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10000 W. Charleston Blvd., Suite 160 Las Vegas, NV 89135
Telephone: 702.901.4800

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8. For such other relief as the Court finds to be just and proper.

AS AND FOR PLAINTIFF’S SECOND CAUSE OF ACTION:

9. For special damages in accordance with proof at trial;

10. For punitive and exemplary damages in an amount in excess of \$10,000.00;

11. For attorney’s fees and costs of suit incurred herein; and

12. For such other relief as the Court may deem just and proper.

AS AND FOR PLAINTIFF’S THIRD CAUSE OF ACTION:

13. For special damages in accordance with proof at trial;

14. For punitive and exemplary damages in an amount in excess of \$10,000.00;

15. For attorney’s fees and costs of suit incurred herein; and

16. For such other relief as the Court may deem just and proper.

AS AND FOR PLAINTIFF’S FOURTH CAUSE OF ACTION:

17. For special damages in accordance with proof at trial;

18. For punitive and exemplary damages in an amount in excess of \$10,000.00;

19. For attorney’s fees and costs of suit incurred herein; and

20. For such other relief as the Court may deem just and proper.

AS AND FOR PLAINTIFF’S FIFTH CAUSE OF ACTION:

21. For special damages in accordance with proof at trial;

22. For punitive and exemplary damages in an amount in excess of \$10,000.00;

23. For attorney’s fees and costs of suit incurred herein; and

24. For such other relief as the Court may deem just and proper.

AS AND FOR PLAINTIFF’S SIXTH CAUSE OF ACTION:

25. For special damages in accordance with proof at trial;

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26. For punitive and exemplary damages in an amount in excess of \$10,000.00;

27. For attorney’s fees and costs of suit incurred herein; and

28. For such other relief as the Court may deem just and proper.

AS AND FOR PLAINTIFF’S SEVENTH CAUSE OF ACTION:

29. For special damages in accordance with proof at trial;

30. For punitive and exemplary damages in an amount in excess of \$10,000.00;

31. For attorney’s fees and costs of suit incurred herein; and

32. For such other relief as the Court may deem just and proper.

DATED this 19th day of March 2025.

NAIMI MULLINS LAW GROUP

By: */s/ Jason Naimi*
Jason Naimi, Esq.
Nevada Bar No. 9441
NAIMI MULLINS LAW GROUP
efile@naimilaw.com
10000 W. Charleston Blvd., Suite 160
Las Vegas, Nevada 89135
Attorneys for Plaintiff

NAIMI MULLINS LAW GROUP

**10000 W. Charleston Blvd., Suite 160 Las Vegas, NV 89135
Telephone: 702.901.4800**

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DECLARATION OF AARON GOODWIN

I, AARON GOODWIN, declare under penalty of perjury, under the laws of the State of Nevada, that the following statements are true and correct:

1. That I have read the foregoing *Complaint for Divorce* and the factual averments it contains are true and correct to the best of my knowledge, except as to those matters based on information and belief, and as to those matters, I believe them to be true.

2. That the factual averments contained within *Complaint for Divorce* are incorporated herein as if set forth in full.

3/19/2025

DECLARED this ____ day of March 2025.

Signed by:

350DF674C2FC429...
AARON GOODWIN
Plaintiff