

NRED

3300 W SAHARA AVE
#330



PLEASE SHARE THESE DOCUMENTS WITH THE NRED COMMISSION. I AM INCLUDING THOSE SENT TO THE NEVADA ATTORNEY GENERAL'S OFFICE, THE NEVADA STATE BAR AND OTHERS,

THE CIVIL LAW SUIT FILED AGAINST THE PREVIOUS FOR VISTANA BOARD MEMBERS STEMS 100% FROM THE NRED COMMISSION HEARING (#2015-3373) BECAUSE OF THIS SUIT THE FOLLOWING OCCURRED

- 1) ANTHONY KNEIP - DIED LAST YEAR - HEIRS SOLD UNIT
- 2) ANDYCE NELSON - DISABLED SINCE 2017 - COULDN'T ATTEND HEARING
- 3) LARRY FITCH - JUST HAD 2ND HEART ATTACK - SOLD UNIT @ VISTANA
- 4) LYNN WILLIAMS - LOOKING FOR A THIS VISTANA BOARD RESPONSIBLE TO JUDGE - REQUESTING IRS AUDIT

THIS VISTANA BOARD STILL HAS NOT REPLACED THE FIRE SPRINKLERS - FIRE INSURANCE INVALID @ SOME BUILDINGS

WOULD LIKE IMMEDIATE ANSWER ON ELECTION.

AM AVAILABLE WITH DOCUMENTS ANYTIME.

SINCE THIS VISTANA BOARD FILED A \$170,000 LIEN ON THE ABOVE AND AN ADDITIONAL \$26,000 AGAINST ME (THEY FROZE AND/OR SEIZED MY BANK ACCOUNT YOU CAN GUARANTEE NRED WILL BE CALLED TO TESTIFY. WHO TELLS THE JUDGE THAT THE DOCUMENTS SUBMITTED TO HER ARE DIFFERENT THAN THE NRED COMMISSION AUTHORED ON SEPT 15, 2017?

Nevada Real Estate Division
3300 W. Sahara Ave. #350
Las Vegas, Nevada 89102

September 6, 2022

Attention: NRED Ombudsman

I am requesting verification of whether I am allowed to run for the Vistana HOA Board. My name is Lynn Williams and I was on the Vistana Board for eight years of which I was the Board President for 7 ½ years. While president our HOA recovered in excess of \$10,000,000 of the \$19 million dollars stolen from us. The Vistana HOA was involved with your office, ref: Case No. 2015-3373. Basically the NRED Commission ruled that the Vistana BOD did not supervise our First Service CAM as to how she handled owners of vehicles that were towed on the Vistana property.

Your Assistant Deputy Attorney General, Michelle Briggs, requested Mr. Peter Keegan, Deputy Attorney General, Office of the Attorney General, Carson City, Nevada to replace her at the NRED Commission hearing. On the second day of this hearing the Commission, Mr. Keegan read from the script authored by Ms. Briggs that the entire Vistana BOD be immediately removed from the Vistana BOD for “knowingly and willingly” violated the law. Mr Keegan further requested that Vistana should be fined \$105,000, an additional \$10,513.58 for costs. (Ms Briggs had made the recommendation that these Vistana Board members be bared for life).

On page 27 of the second day the NRED Chairman, Mr. Rizzi stated **“for the record that was the State’s recommendation, not the Commission.”** The results of the matter was that the NRED Commission did not fine the Vistana HOA anything. None of the Vistana Board members were removed and they were allowed to remain on the Vistana Board. They did rule that if the BOD wanted to remain on the Board they would be required to take 9 hours of NRED training. Both Mr. Kniep and I completed the required training.

I am attaching my copy of the final order from the NRED Commission with an effective date of September 19, 2017. I suggest you verify that my copy is the same as your office copy. Please note that the end of this letter it was signed by Claudia Rosolen, Commission Coordinator. Under her signature it also reflects:

cc: Michelle Briggs, Senior Deputy Attorney General

Approximately a year later Ms. Briggs advised the NRED Commission at a public meeting that the Vistana BOD members had to be removed immediately. This was after Mr. Chris Rees had addressed the Commission that he and others had filed complaints against us and nothing happened. Mr. Rees was not happy because we would not place

his name on the ballot for running for the Vistana Board. Prior to making our decision, First Service checked with your office and agreed that he could not prove that he had any legal interest in the unit he was living in at Vistana. Mr. Rees lied to the Commission and no one in your office could ever produce any complaints.

I am now suggesting that your office immediately the following:

EIGHTH JUDICIAL DISTRICT COURT, CLARK COUNTY, NEVADA
Case No. A-20-826290-C
Dept No. 23

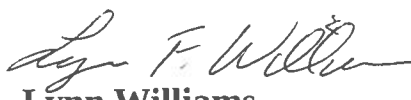
It is my understanding that Ms. Briggs apparently filed charges with this Court that the four old Vistana BOD members “were found guilty of “knowingly and willingly” violate the law.

Mr. Rees and the others who intentionally committed Mail Fraud got on the Vistana Board, fired the attorney who recovered over \$10,000,000 and hired the law firm of John Leach. I am also enclosing his motion to the Court that he filed using the results of the September 19, 2017 NRED hearing. Mr. Leach’s law firm obtained a Court Order based solely on the NRED Commission results of September 19, 2017. The current Judgment is \$174,906.41 against the old members and an additional levy of \$22,768.42 against me. No documentation was provided in this levy.

On August 26, 2022 I went to my Chase Bank to obtain money to finish paying for my Forest Lawn Cemetery plots for the burial of my daughter on August 27th. Over \$26,000 had been frozen (100%) of the money I had at that bank.

Vistana is holding elections in the immediate future. I need to know in writing if NRED is going to adhere by the September 19, 2017 decisions or is NRED going by their attorney who furnished her brand of justice. If your office needs additional time to verify this information I request that the Vistana elections be postponed.

I also have a great deal of additional information that impacts the Health and Well Being of the Vistana community that has been reported to your office in writing however no action has been taken. If you have any questions please contact me.

 9/6/22
Lynn Williams
3625 Gundry Ave.
Long Beach, California
562 708-5178



1 **NEOJ**
2 **LEACH KERN GRUCHOW**
3 **ANDERSON SONG**
4 SEAN L. ANDERSON
5 Nevada Bar No. 7259
6 sanderson@lkglawfirm.com
7 RYAN D. HASTINGS
8 Nevada Bar No. 12394
9 rhastings@lkglawfirm.com
10 2525 Box Canyon Drive
11 Las Vegas, Nevada 89128
12 Telephone: (702) 538-9074
13 Facsimile: (702) 538-9113
14 *Attorneys for Vistana Condominium Owners Association*

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

11 VISTANA CONDOMINIUM OWNERS
12 ASSOCIATION, INC., a Nevada Corporation

13 Plaintiffs,

14 vs.

15 LYNN WILLIAMS, an individual; LARRY
16 FITCH, an individual; ANTHONY KNEIP, an
17 individual; ARDYCE NELSON, an individual
18 and DOES I-XX,

19 Defendants.

Case No.: A-20-826290-C
Dept. No.: 23

**NOTICE OF ENTRY OF ORDER
GRANTING ATTORNEYS' FEES AND
COSTS AND JUDGMENT**

LEACH KERN GRUCHOW ANDERSON SONG
2525 Box Canyon Drive, Las Vegas, Nevada 89128
Telephone: (702) 538-9074 -- Facsimile (702) 538-9113

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27 GO DOWN 5 PAGES

28 SEE WHAT WAS FILED IN STATE COURT

1 CSERV

2 DISTRICT COURT
3 CLARK COUNTY, NEVADA

4
5
6 Vistana Condominium Owners
Association, Inc., Plaintiff(s)

CASE NO: A-20-826290-C

7 vs.

DEPT. NO. Department 23

8
9 Lynn Williams, Defendant(s)

10
11 **AUTOMATED CERTIFICATE OF SERVICE**

12 This automated certificate of service was generated by the Eighth Judicial District
13 Court. The foregoing Order was served via the court's electronic eFile system to all
recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 7/8/2022

15 Sean Anderson	sanderson@lkglawfirm.com
16 Robin Callaway	rcallaway@lkglawfirm.com
17 Ryan Hastings	rhastings@lkglawfirm.com
18 Patty Gutierrez	pgutierrez@lkglawfirm.com
19 Yalonda Dekle	ydekle@lkglawfirm.com

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LEACH KERN GRUCHOW ANDERSON SONG
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CERTIFICATE OF SERVICE

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Pursuant to NRCPC 5(b), the undersigned, an employee of LEACH KERN GRUCHOW ANDERSON SONG, hereby certifies that on this 11th day of July, 2022, service of the foregoing, **NOTICE OF ENTRY OF ORDER GRANTING ATTORNEYS' FEES AND COSTS AND JUDGMENT**, was made on all parties via the Court's CM/ECF System and/or U.S. mail, as follows:

U.S. MAIL

Larry Fitch
8122 W. Flamingo Rd #111
Las Vegas, Nevada 89147
Email: lzfitch@hotmail.com
Pro Se Defendant

U.S MAIL & E-MAIL

Lynn Williams
3625 Gundry Avenue
Long Beach, California 90807
Email: lynnfwilliams@yahoo.com
Pro Se Defendant

U.S. MAIL & E-MAIL

Ardyce Nelson
7173 S. Durango Drive, Unit 211
Las Vegas, Nevada 89113
Email: mkamt@aol.com
Pro Se Defendant

U.S. MAIL & E-MAIL

Anthony Kneip
7123 S. Durango Drive, Unit
107
Las Vegas, Nevada 89113
Email: patkneip@gmail.com
Pro Se Defendant

/s/ Yalonda Dekle

An Employee of LEACH KERN GRUCHOW
ANDERSON SONG

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**JUDG
LEACH KERN GRUCHOW
ANDERSON SONG**
SEAN L. ANDERSON
Nevada Bar No. 7259
sanderson@lkglawfirm.com
RYAN D. HASTINGS
Nevada Bar No. 12394
rhastings@lkglawfirm.com
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Telephone: (702) 538-9074
Facsimile: (702) 538-9113
Attorneys for Vistana Condominium Owners Association

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

VISTANA CONDOMINIUM OWNERS
ASSOCIATION, INC., a Nevada Corporation

Case No.: A-20-826290-C
Dept. No.: 23

Plaintiffs,

**ORDER GRANTING MOTION FOR
ATTORNEYS' FEES AND COSTS AND
JUDGMENT**

vs.

LYNN WILLIAMS, an individual; LARRY
FITCH, an individual; ANTHONY KNEIP, an
individual; ARDYCE NELSON, an individual
and DOES I-XX,

Defendants.

On March 25, 2022, Plaintiff Vistana Condominium Owners Association ("Association")
filed its Motion for Attorneys' Fees and Costs. The Defendants did not file an Opposition to the
Motion. On April 14, 2022, the Association filed a Notice of Non-Opposition to its Motion for
Attorneys' Fees and Costs. A hearing on the Motion for Attorneys' Fees and Costs was set for
June 14, 2022. Ryan Hastings appeared on behalf of the Association.

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1 The Court, having carefully considered all pleadings and papers on file herein and
2 considering the oral arguments of counsel, and for good cause appearing, finds as follows:

3 **FINDINGS OF FACT**

4 1. On September 19, 2017, the Commission for Common-Interest Communities and
5 Condominium Hotels, Department of Business and Industry, State of Nevada (the
6 “Commission”) determined that the Defendants “knowingly and willingly” violated the law with
7 regard to their fiduciary duties as board members of the Association.

8 2. On October 19, 2017, Defendants filed a Petition for Judicial Review and named
9 the Association as a party. This caused the Association to incur additional fees and costs of
10 defense.

11 3. On December 30, 2019, the District Court entered an Order denying the Petition
12 for Judicial Review and affirmed the Commission’s Order regarding the Defendants’ violations
13 of NRS 116 and NRS 487.

14 4. The Association incurred costs of \$116,010.91 in defending Defendants in both
15 the matter before the Commission and the Petition for Judicial Review.

16 5. Defendant Williams utilized his position on the Association’s Board of Directors
17 to demand and receive payments in the amount of \$22,768.42 for providing consulting and/or
18 legal services.

19 6. On December 14, 2020, the Association filed its Complaint against the
20 Defendants asserting claims for breach of restrictive covenants, breach of NRS Chapter 116,
21 Breach of NRS 116 – Defendant Williams Only, breach of fiduciary duty, unjust enrichment, and
22 declaratory relief.

23 7. On December 6, 2021, the Association filed its Motion for Summary Judgment.
24 The Motion came on for hearing before the Honorable Jasmin Lilly-Spells, on January 11, 2022,
25 at which time the Court granted the Motion in its entirety. *See* Findings of Fact, Conclusions of
26 Law.

27 8. The Association as the prevailing party to this case is entitled to its reasonable
28 attorneys’ fees pursuant to NRS 116.4117 and NRS Chapter 18.

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CONCLUSIONS OF LAW

1
2 1. NRS 116.4117 provides a basis upon which an award of attorneys’ fees may be
3 granted. Pursuant to NRS 116.4117(6) “[t]he court may award reasonable attorney’s fees to the
4 prevailing party.” Statutory interpretation is an issue of law that this Court reviews *de novo*.
5 *Washoe Medical Center v. Second Judicial Dist. Court of State of Nev. ex rel. County of Washoe*,
6 122 Nev. 1298, 1302, 148 P.3d 790, 792-93 (2006). When a statute is clear on its face, a Court
7 “will not look beyond the statute’s plain language.” *Id.* at 793.

8 2. In Nevada, “the method upon which a reasonable fee is determined is subject to
9 the discretion of the court,” which “is tempered only by reasons and fairness.” *Shuette v. Beazer*
10 *Home Holding Corp.*, 121 Nev. 837, 864, 124 P.3d 530, 548-49 (2005).

11 3. The factors the court must consider in its analysis of the required amount of
12 attorneys’ fees include: (1) The qualities of the advocate: his ability, training, education,
13 experience, professional standing and skills; (2) The character of the work done; its difficulty,
14 intricacy, importance, time and skill required, the responsibility imposed and the prominence and
15 character of the parties where they affect the importance of the litigation; (3) The work actually
16 performed by the lawyer, the skill, time and attention given to the work; and (4) The result;
17 whether the attorney was successful and what benefits were derived. *Brunzell v. Golden Gate*
18 *National Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969).

19 4. The Association, as the prevailing party in this matter, has incurred substantial
20 attorneys’ fees and costs in the amount of \$32,566.50.

21 5. The Court finds that pursuant to the factors set forth in *Brunzell* and *Cadle Co.*
22 *v. Woods & Erickson, LLP*, 131 Nev. 114, 120, 345 P.3d 1049, 1054 (2015), the Association’s
23 attorneys’ fees and costs sought were reasonable, supported by evidentiary documentation,
24 and were necessarily incurred. The Association provided evidence that its attorneys’ hourly
25 rates were reasonable. The time entries were for tasks actually and necessarily incurred and
26 the result obtained was of a substantial benefit to the Association.

27 6. After oral argument on the Motion for Attorneys’ Fees and Costs, the Court
28 finds that the facts and circumstances in this case were unique, which required research and

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2525 Box Canyon Drive, Las Vegas, Nevada 89128
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1 analysis that legal counsel had not encountered previously, even considering the extensive
2 experience of counsel in the relevant area of the law. The Court finds that these additional
3 efforts justified additional time spent by the attorneys, as reflected in the billing
4 documentation submitted with the Motion.

5 Accordingly, **IT IS HEREBY ORDERED, ADJUDGED AND DECREED**, the
6 Association is awarded its attorneys' fees in the amount of \$32,566.50 and costs in the amount of
7 \$1,079.37 pursuant to NRS 116.4117 and NRS Chapter 18 against the Defendants.

8 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED**, that this Order shall
9 also operate to supplement the judgment against Defendants in favor of the Association entered
10 on March 4, 2022, effective upon notice of entry of order.

The court hereby vacates the
award of costs in the amount of
\$1048.02 as noted in the May 24,
2022 minute order.

IT IS SO ORDERED.

Dated this 8th day of July, 2022



DISTRICT COURT JUDGE
es

13 Submitted by:

14 **LEACH KERN GRUCHOW ANDERSON SONG**
15 **BAC6A B6A2 68CE**
16 **Jasmin Lilly-Spells**
17 **District Court Judge**

18 /s/ Ryan D. Hastings
19 Sean L. Anderson
20 Nevada Bar No. 7259
21 Ryan D. Hastings
22 Nevada Bar No. 12394
23 2525 Box Canyon Drive
24 Las Vegas, Nevada 89128
25 *Attorneys for Plaintiff Vistana*
26 *Condominium Owners Association*

1 PLEASE TAKE NOTICE that a **ORDER GRANTING MOTION FOR**
2 **ATTORNEYS' FEES AND COSTS AND JUDGMENT** was entered in the above-entitled
3 case on July 8, 2022, a copy of which is attached hereto.

4 Dated this 11th day of July 2022.

5 **LEACH KERN GRUCHOW ANDERSON SONG**

6
7 /s/ Ryan D. Hastings

8 Sean L. Anderson

9 Nevada Bar No. 7259

10 Ryan D. Hastings

11 Nevada Bar No. 12394

12 2525 Box Canyon Drive

13 Las Vegas, Nevada 89128

14 *Attorneys for Vistana Condominium Owners*
15 *Association*

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DEPARTMENT OF BUSINESS AND INDUSTRY
REAL ESTATE DIVISION

www.red.nv.gov

September 20, 2017

Vistana Condominium Owners Association,
Larry Fitch, Anthony Knelp, Lynn Williams
c/o Richard E. Haskin
Gibbs, Giden, Locher Turner Senet & Wittbrodt LLP
1140 N. Town Center Dr., Suite 300
Las Vegas, Nevada 89144

Certified No. 7016 2070 0000 4948 767-

Re: NRED v. VISTANA CONDOMINIUM OWNERS ASSOCIATION, LARRY FITCH, ANTHONY
KNELP, LYNN WILLIAMS; and ARDYCE NELSON
Case No. 2015-3373

Dear Mr. Haskin:

Enclosed herewith you will find the FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER entered by the Nevada Commission for Common-Interest Communities and Condominium Hotels at the meeting held August 29-30, 2017 in Carson City, Nevada.

The Commission has ordered the following:

1. RESPONDENTS LARRY FITCH, ANTHONY KNELP, LYNN WILLIAMS, and ARDYCE NELSON shall each, individually pay an administrative fine totaling \$5,128.40 to the Division on or before January 1, 2018. The fine due from each board member Respondent is comprised of a fine for the violations of law totaling \$2,500, plus costs of \$10,513.58 (representing the total amount due for the Division's attorney's fees and costs, divided equally among the four board member Respondents).
2. RESPONDENTS LARRY FITCH, ANTHONY KNELP, LYNN WILLIAMS, and ARDYCE NELSON shall report to the Commission no later than the Commission's March 2018 meeting with the status of their payment of the administrative fine.
3. RESPONDENT board members currently seated or re-elected shall complete 9 hours of board education classes offered by the Division no later than August 30, 2018 and shall verify completion of this education requirement with the Commission.
4. Failure of RESPONDENTS LARRY FITCH, ANTHONY KNELP, LYNN WILLIAMS, and ARDYCE NELSON to satisfy the requirements of this Order will result in removal from the Association's board.
5. The Association shall make full restitution to the owners of vehicles improperly towed during the August 2014 resurfacing project, and shall report its progress to the Commission no later than the Commission's March 2018 meeting.

EFFECTIVE DATE OF THIS ORDER: SEPTEMBER 19, 2017

3300 W. Sahara Avenue, Suite 350, Las Vegas, Nevada 89102
1818 E. College Parkway, Suite 110, Carson City, Nevada 89706

Telephone: (702) 486-4033 Fax: (702) 486-4275
Telephone: (775) 684-1900 Fax: (775) 687-4868

VISTANA CONDOMINIUM OWNERS ASSOCIATION

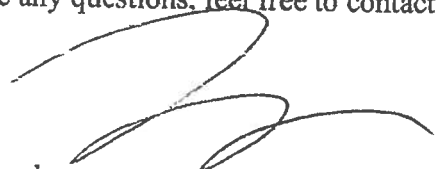
September 20, 2011

Page 1

PAYMENT DUE DATE: JANUARY 1, 2011
EDUCATION DUE DATE: AUGUST 30, 2011

if you have any questions, feel free to contact me at (702) 486-4606, or rosolen@red.nv.gov.

Sincerely,



Claudia Rosolen
Commission Coordinator

cc: Michelle Briggs, Senior Deputy Attorney General

State Bar of Nevada
3100 W. Charleston Blvd. Suite 100
Las Vegas, Nevada 89102

September 6, 2022

Re: Conflict of Interest complaint against Mr. John Leach

On August 18, 2022 I filed a complaint against Mr. John Leach for a conflict of interest by representing **BOTH** the Vistana HOA while still being an employee of the First Service Management Company. The new violation of law concerns Mr. Ryan D. Hastings an attorney with the firm Leach Kern Gruchow Anderson and Song. If the Nevada Bar requires me to file a separate complaint, please advise. The reason I am adding this individual is because he is the lawyer who filed the Nevada Case No. : A-20-826290-C. For your immediate reference I am attaching an additional copy of this filing.

Please refer to the **FINDINGS OF FACT** section #1:

On September 19, 2017, the Commission of Common-Interest Communities and Condominium, Hotels, Department of Business and Industry, State of Nevada (the "Commission") determined that the Defendants "knowingly and willingly" violated the law with regard to their fiduciary duties as board members of the Association.

The actual dates of the Nevada Real Estate Division hearing regarding this issue were August 29 and August 30, 2017. The specific Case No. was 2015-3373. and the Hearing was held in Carson City, Nevada. The transcript of the first day consists of 175 pages and the number of pages for the second day consists of an additional 45 pages of testimony. The original Council for the NRED Commission was Deputy Attorney General Michelle Briggs who after refusing to stipulate for a continuance of this hearing. I was out of the Country and could not attend this hearing. It should be noted that Ms. Briggs had another attorney take her place for the State of Nevada, a Mr. Peter Keegan. Without repeating the entire transcript I will attempt to provide the Bar with a brief synopsis of the major portions of the testimony.

Mr. Keegan, reading from Ms. Briggs script requested from the NRED Commission that the entire Vistana Board be immediately removed from the Vistana Board for "knowingly and willingly" violated the law. A great deal of testimony was taken and then the deliberations regarding this investigation were taken up on the second day of the hearing. The States recommendation as to the penalty for the Vistana Board members was the following: \$105,000 in fines for the Vistana HOA, \$10,513.58 in costs for the investigation and removal of the four board members. (Ms. Briggs had made the recommendation that the Vistana board members be bared for life.) On page 27 of the

second day the NRED Chairman Mr. Rizzi stated “for the record that was the State’s recommendation, not the commission.”

The NRED Commission finally determined that the Vistana HOA was not fined for this event. That if the Board members wanted to remain on the Vistana Board they would be required to attend 9 hours of of board education classes offered by the Division and verify to the Commission that the classes were taken. There also were administrative fines of \$5,128.40 for each Vistana Board member.

Effective date of this order: September 19, 2017.

Apparently Ms. Briggs did not agree with the NRED’s final determination, so she changed the results and she was the sole individual who presented any findings to the State Court. It should also be pointed out that First Service Management was advised of these results by the Vistana legal council, Richard Haskins.

In the filings with the State Court, Mr. Hastings stated that the costs for our “knowingly and willingly” by Vistana were \$116,010.91. and he advised the courts of this figure. If I were still a Federal Special Agent I would request proof of these expenditures in writing. In this same filings as I stated in my complaint against Mr. Leach I would request copies of the checks paid to me as he advised the State Court off payments I received in the amount of \$22,768.42. I would like to know the dates, number of checks, the type of instrument paid in and the account or accounts that the checks were deposited or cashed at.

I am also including a partial list of individuals that I also with the old Vistana Board was involved in collecting in order to recover the \$19,000,000 stolen from the Vistana HOA. Mr. Leach and the current Vistana Board has not followed up on any recovery efforts except to file false charges in State Court in the form of a Summary Judgment. As stated in my original complaint of a conflict of interest, Mr. Haskins had numerous meetings with First Service’s attorney and they discussing if Vistana had spent \$75,000 total on the towing costs. Mr. Hastings had the figure at \$116,010.19. How did he come up with this figure when this Judgment was for what had happened back in 2017 through 2020 when I wasn’t even on the Board and three of the current Board members who are on the Vistana Board now were still authorizing collection from First Service? I am unaware what the Leach law firm is charging Vistana but I do know that the Gibbs Giden law firm only charged Vistana 25% of the recovered funds.

As stated in my previous complaint Mr. Kniep and I hired the Boyack law firm and I personally provided this firm with **ALL** relevant documents yet since Mr. Boyack was Mr. Leach’s friend he only recommended that we settle this claim knowingly that

the September 19, 2017 Commission hearing cleared the old Vistana Board of only exercising poor judgment in believing the First Service CAM.

On Friday August 26, 2022 I had to go to Forest Lawn Cemetery in Cypress, California to finalize and pay for the final expenses for my daughter's funeral. I then immediately went to my Chase Bank accounts to obtain a \$14,000 cashier check to pay for the plots. I was advised that a hold had been placed on both my checking account and my savings account by Vistana. I had to go home and advise my 77 year old disabled wife that our money had not only been place on hold but apparently is was going to be seized soon. The amounts now had grown to \$174,906.41 and \$26,2333.90. I had no prior notice of any specific due date of any monies being demanded. I was aware that the documents that Mr. Hasting submitted to the Nevada State Court were false and I was in the process of hiring another attorney. I mistakenly assumed that a competent attorney would not risk disbarment and or criminal prosecution that he/she would seize an individuals money without reviewing the original source document.. I knew that First Service was aware that the Vistana Board members were cleared. I knew that at least three of the current Vistana Board members were also aware.

Apparently the authorization to sue Vistana's previous Board members voted for this action and did not advise the homeowners. Again First Service is the entity that takes and stores the Vistana minutes.

With the action taken by Mr. Hastings and Mr. Leach will certainly effect my ability to continue doing consulting work. For your information I was the first Special Agent from all government agencies west of Washington D. C. to obtain a RICO conviction. I was one of two Special Agents in the Pacific Region (8,000 employees) to hold a SCI security clearance. I don't know how this will effect my credit rating, you might. I have testified before the Bar Association previously against Nevada lawyers. I will be happy to provide copies of any documents I have referenced. I realize that for whatever reasons (except money) most of the attorneys that get involved with the Vistana HOA follow their own rules.

I am available to come to Las Vegas anytime if needed. I have also previously provided much more documentation with the Nevada's Attorney Generals office at the end of November 2021. They advised that due to COVID due to the number of referrals they would not be able to even look at my documents until the first of April, 2022.



Lynn Williams
562 708-5178

***Explanation of Grievance Complaint Details**

In order for us to better understand and investigate your claim, please provide specific information regarding your grievance. In the space above, please provide in narrative form a comprehensive and detailed description of the persons and events involved in the conduct which you believe constitutes a breach of professional ethics. In essence, please provide us a story about what occurred in the legal matter underlying your complaint. It is not necessary for you to cite specific Rules of Professional Conduct. However, it is very important that a complete and thorough explanation of events and dates be provided.

Ref Case No: A-20-826290-C

Attached is the latest filing that I have received regarding this case. It was filed by Ryan D. Hastings, apparently an employee in Mr. John Leach's law firm. The first question I have was Mr. Hasting under oath or did he swear that the facts in this order true and correct? As you will see in my responses validating my claim that Mr. Leach has a conflict of interest in representing both First Service Management and the Vistana HOA as their legal counsel. I was amazed that Mr. Hasting advised the Court that on page 2 Section 5 that I used my position to both demand and receive payments in the amount of \$22,768.42. I hear by authorize you to forward any proof of this amount of money to the IRS. You will notice that all dates were omitted. None of the checks were identified by number, bank account and or dates issued.

Please review section 4 on page 2 which also states the Association incurred \$116,010.91 in costs defending the defendants in this case. Notice that Mr. Hastings failed to include the dates in this case. As pointed out in my attachments there were 12 other Board members who voted and authorized our attorneys to pursue recovery of funds from First Service over a period of nine plus years. There are public recordings that verify this.

I am unaware how Mr. Hastings determined that on September 19, 2017 the Vistana Board (defendants) "knowingly and willingly" violated the law. He obviously was not at the hearing nor did he read the transcripts. In order to provide your body the truth as to what took place at the August 2017 hearing I am also providing a transcript of the two days of hearings. Please take into consideration Mr. Leach's version of events both at this hearing and his actions during the past two years on and who it benefited, Vistana or First Service Management. How likely is it that after a two day hearing that if we were convicted of knowingly and willingly violated NRED rules the Commission would allow us to continue being on the Vistana Board.

Finally if it is determined that Mr. Hastings and Mr. Leach filed false documents with the Court will the Nevada Bar take appropriate action? I have testified in both State and Federal Court since 1970 and I am aware of the penalty for perjury.

Date: 8/18

Lynn Williams
Printed Name

Lynn Williams
Signature

The following complaint is against Attorney John E. Leach for having a Conflict of Interest in being a paid contract employee the First Service Management and the General Counsel for the Vistana HOA. The First Service Management Service has been the Management company for Vistana for the past 10 years.

As background, the Vistana HOA was the initial victim of the largest Real Estate fraud in Nevada's history during the first decade of 2000 ending in 2009. The case was prosecuted in the Las Vegas Federal Court. The Justice Department imported Mr. Charles La Bella from Main Justice to be the lead prosecutor along with attorneys from San Diego and Las Angeles. Mr. La Bella stated that there were 100 people of interest involved in the fraud against the Vistana HOA and several other HOA's in Las Vegas.

Without going into the particulars, the Government decided to only file charges against approximately 50 individuals however a number died prior to trial and 42 were prosecuted. At least five attorneys were disbarred and millions of dollars in restitution were ordered to be repaid to the Vistana HOA. One attorney went to trial, Mr. Keith Gregory, who acted both as General Council for Vistana and Mr. Leon Benzer, the primary violator who was still alive. Mr. Gregory did make a voluntary disclosure to the Vistana Board that he also represented Mr. Benzer and the Vistana BOD approved of him representing both parties. The problem was the Vistana Board was controlled by Mr. Benzer. At a public Vistana BOD meeting Mr. Gregory assured the homeowners that everything he was advising the Vistana home owners was according to Nevada real estate law. When questioned about getting a second opinion Mr. Gregory assured the owners that he would bring in another attorney to verify the Nevada Real Estate laws. The following meeting he brought in an experienced Nevada lawyer, John E. Leach.

Mr. Leach initially stated a variance of his understanding but after Mr. Gregory asked for a break to discuss the points of law, they came back and Mr. Leach clarified his position and advised the Vistana home owners that Mr. Gregory was correct and he was wrong. I was unable to determine if Vistana paid for this second opinion or if Mr. Gregory paid him. I do know that the Federal Court and trial jurors determined that Mr. Gregory was not correct and the Judge sentenced Mr. Gregory to serve 10 years in Federal prison.

I was elected to the Vistana BOD approximately 10 years ago and within 6 months I was elected President of the Vistana Board based on my background. I had retired as a Treasury Special Agent and had specialized in Intelligence matters and being a Fraud supervisor. My primary goal was to attempt to recover as much money as I could for the Vistana home owners. I was voted by the other Board members to have sole authority to accept or reject any offer from the various individuals or concerned parties in order to collect the stolen funds. Although the Federal Court had ordered over \$12.6 million dollars to be repaid to the Vistana HOA, they were not involved in any

collections. The very first decision was to hire a competent law firm, Gibbs Giden. Mr Richard Haskins was the lead attorney who was responsible for the Las Vegas office. Over the next eight years the Vistana HOA collected over \$6,000,000 from the estate of Nancy Quon, one of the primary masterminds regarding the theft of over \$19,000,000 from the Vistana HOA. This was done through months of court ordered mediation. The Vistana HOA also sued the attorneys who represented Mr. Leon Benzer, the other primary individual who was also responsible for overseeing various fraudulent HOA elections throughout Las Vegas.

After a civil trial in State Court the law firm, Kummer Kaempfer was found liable and responsible for their part in the fraud. Rather than appealing the results of the trial, Vistana agreed to accept a \$4,100,000 settlement. Vistana then focused their efforts in going after the additional millions of dollars stolen from the Construction Defects account. Vistana collected \$100,000 from Attorney Gregory as a settlement for his part in the fraud against Vistana. Additional convicted violators have also settled with Vistana for \$1,000's of additional dollars.

During the years in recovering additional stolen funds, Vistana's Community manager, a First Service Management employee, became involved in illegally collecting cash from Vistana home owners. After complaints were made to the Nevada Real Estate Division (NRED), she was charged with performing unauthorized acts, her license was down graded. At the same time new Vistana owners made attempts to recover the Construction Defects monies for themselves and not to repair the Vistana property as required by the courts. These individuals appeared before the NRED Commission, made false statements and the Deputy State Attorney General, Briggs demanded the Commission reverse their previous ruling and have the Vistana Board be removed. The NRED investigator, Christine Pitch testified in State Court that she investigated the Vistana Board. She testified that she never wrote any reports nor had any idea how many Vistana vehicles had been towed. The individuals who wanted the recovered funds for themselves ran for the Board and by promising another \$10,000,000 recovery and they would give every owner \$13,000.

I along with a retired F B I Special Agent presented these false statements made in a mailing running for the Vistana Board to a Las Vegas Postal Inspector. Their office determined that these four individuals were guilty of Mail Fraud however his boss wouldn't file charges since no money had been misappropriated. That is no longer the case. After the removal of the Board that had actually recovered almost \$11,000,000 the new Board appointed me to continue for the Vistana to be the lead individual responsible for obtaining addition funds. The old Board had been in negotiations with First Service to recover those attorney fees defending the Vistana Board. Mr. Haskins met with the new Vistana Board president, Carlos Aguirre (a retired FBI Special Agent) and advised that a

e. That I was advised that I was no longer to be involved in recovery actions of any stolen money.

f. He made up a story that I demanded and was paid \$22,000.

The reality of the illegal towing by the Community Manager are as follows:

a. The new First Service Manager claimed to have spent numerous hours trying to reconstruct how many and their identities of the vehicles towed. She claimed to find approximately 28 Vistana households involved and Vistana reimbursed them.

b. From the time of the illegal towing to the actions taken by Mr. Leach there were a total of at least 12 Vistana BOD members who were on various Vistana Boards who made specific decisions concerning the attempts to recover the funds taken from the victims of the illegal towing and recover the First Service funds.

c. It was discovered during this period of time that First Service had received in the discovery phase of the Community Managers NRED hearing, that the Community Manager had in fact detailed records that she had illegally towed 118 vehicles at Vistana. These records were entered in the NRED hearing.

d. Although she had left over \$2,000 in cash at her Vistana desk the night she was found guilty by the NRED Commission and her license was downgraded she had received over \$5,000 unaccounted for from the illegal towing.

Mr. Leach continues to file motions with the Eighth Judicial District Court demanding Attorney Fees and Costs and Judgment. He also filed against DOES 1-XX. This is filed under Case No: A-20-826290-C. The four plaintiffs are Lynn Williams, Larry Fitch, Anthony Nelson and Ardyce Nelson. Larry Nelson sold his property over a year ago. Anthony Kneip died in his bed at Vistana and his estate sold the property. Ardyce Nelson does not own any assets other than her condo and Lynn Williams (I) live in California and my Vistana property is in a Trust account.

This court action was filed after I discovered the additional money stolen by the First Service Community Manager. Mr. Leach may have a personal dislike for the old Vistana Board since it was going to file a civil claim against Mr. Gregory for his active participation in the fraud against the Vistana HOA. If Mr. Leach reviewed the Vistana HOA minutes of the open public Board meetings he would have discovered that Mr. Gregory paid Vistana \$100,000 prior to going to his prison. If Mr. Leach is protecting the Vistana homeowners why did he not follow through with the collection of the \$75,000 from First Service Management? Why didn't he file against the eight other former Vistana Board members for voting at public meetings to go after the stolen funds? These votes were made at public Vistana HOA meetings and both in the minutes and recorded. After additional evidence was discovered that a First Service employee had stolen additional \$1,000 of dollars, weren't those owners/renters at Vistana notified? How did the lack of action benefit the Vistana HOA? How did his actions benefit First

Service? First Service didn't have to pay back the Vistana HOA and they didn't have to notify the NRED Commission they withheld the requested information.

The home owners at Vistana were under the impression that Mr. Leach is attempting to recover the stolen funds as previously discussed in open Vistana public Board meetings. Prior to my removal and working with Mr. Richard Haskins, 18 separate and individual civil law suits were either pending or there were discussions with these individual lawyers to recover stolen funds. Although there were additional convicted felons in the Federal Court trial, it had been determined that only 18 of these individuals had sufficient assets to make it worth while to file suit against. At a meeting attended by Mr. Haskins, retired FBI agent Aguirre and myself, it was agreed that the Vistana HOA should recover an additional \$600,000 based on previous results and assets available to these convicted felons.

In keeping with additional recovery of stolen funds, inquiries should be made as to what measures Mr. Leach has undertaken to recover any money from the over \$30 million dollar judgments ordered by the Courts.

In addition to the recovery of funds, the old Vistana HOA board would verify that any major activity undertaken by the Board would follow good business principles. I along with other Board members were trained by First Service to hold open and public competition on major service and material contracts. I believe the monetary figure was \$10,000 for any contract or service entered by the Vistana HOA. Vistana HOA was on a month by month contract for the 8 years I was on the Board. If we did not have three bids on a contract and it was not an emergency we would either request additional bids or postpone the expenditure for an additional month. Apparently First Service has changed its recommendations. At an open public meeting First Service presented to the new Board a proposed annual contract for the same services it had been performing. The expenditure for this contract was over \$300,000 per year. They did not disclose the amount of the contract nor were any other bids ask for or presented. The monthly HOA fees were increased by 7.5%. This contract certainly did not benefit the Vistana HOA by not having any competitor involved. What was Mr. Leach's position on this noncompetitive contract or doesn't he involve his law firm on reviewing major expenditures?

As previously reported the old Vistana Board invested in excess of \$3 million dollars into an investment account that **GUARANTEED** that we would not lose a penny of the construction defect money but also earn a minimum of 1 % interest. There was a 10% withdraw provision without any penalty if there was an emergency construction defect repair was needed. The new Board did in fact withdraw \$300,000 but did not notify the owners what the emergency was. The old Board only hired vendors via competitive bids and none of the First Service recommendations ever were

selected due to their higher costs. The new board made a number of changes they deemed important. They eliminated the monthly meetings and switched to quarterly meetings. They got rid of the charter mandated committees and no longer had individual Vistana owners follow or enforcement of CC & R's, and various rules previously deemed important.

Since the NRED Commissioners asked their Investigator, Christine Pitch how many hours she had spent on the investigation (for reimbursement of the State of Nevada's costs) on the old Vistana board. Investigator Pitch testified that the costs incurred by her amounted to \$20,000. As a Federal Criminal Special Agent both as an investigator, supervisor and Director of Intelligence I have a good idea what could and is required to be done in an investigation like this. I was present in state Court when Ms. Pitch was on the witness stand and cross examined by Mr. Haskins. Under oath Ms Pitch testified to the following:

1 She never wrote any reports regarding this investigation.

2 She did not know how many vehicles were towed illegally by the First Service Community Manager.

3 She did not interview any of the old Vistana Board members to determine if any of them authorized the First Service Community Manager to demand cash from the owners for towing their vehicles.

4 She did not interview any renters or owners regarding their vehicles.

5 She did talk with Board member Rykie in South America and he said he did not attend the Board meeting where the res of the Board authorized the towing in this case. Had Ms. Pitch asked the Board she would have determined that Mr. Rykie did attend the Boar meeting via Skype and that the meeting was taped.

6 That she did interview the First Community manager in the previous investigation and she believed Rosario Orozco's statement that she was authorized to take cash and have the vehicles towed.

Since this is the sole evidence Mr. Leach is relying on to dismiss the \$75,000 claim Vistana had against First service, I wonder how he was representing Vistana's interest and not acting for his other employer, First Service Management. It should be noted that First Service withheld all of the documents from the Orozco's NRED hearing from Vistana. They then had the new CAM lie to the old Vistana Board.

As a retired Special Agent I took it upon myself to gather the facts involved in the entire Criminal investigations and the various civil investigations. Attached with this complaint is a copy of the documents I provided to the Nevada's Attorney Generals office. Among the exhibits are approximately 118 pages of documents from the internal files of the Nevada Real Estate Division regarding this case. This is the State Agency that employed (and still Does) Christine Pitch. It contains the United States Postal

Inspection's name and contact information regarding the Mail Fraud involved with this case. A review of these documents by your office will prove statements made in this case. It will show what documents there are and since all of the minutes of the monthly minutes for the eight years I was on the Vistana Board that which investigator is truthful/ It will also provide an outline of the questions that Mr. Leach should be asked to determine what documents he has either from First Service or independently gathered to prove the allegations he has made to the State Court against the old Vistana Board.

Since the Vistana HOA refused to provide legal assistance for this case, Mr. Kniep apparently hired a private attorney to defend the false charges put forth by Mr. Leach claiming First Service Management did not cost the Vistana HOA any money. I was advised that he hired the firm Boyack Orme and Anthony. Mr. Kniep met with a Colli McKiever a number of times. Mr. Kniep stated that Mr. Boyack spent the entire time trying to convince him (Kniep) to settle the case and agree to refund the Vistana HOA. Mr. Kniep gave a multi thousand retainer (possibly \$5,000). We discussed the case and agreed not to pay a dime for these charges as we had discovered that Ms. Orozco had kept \$1,000's of dollars in addition to lying to Ms. Pitch. After a period of time I also provided thousand of dollars to continue the case. Mr. Kniep advised that he had received a conference call between Ms. Nelson and himself from Mr. Boyack.

I was unaware of this call and only know what was relayed by Mr. Boyack from Mr. Kniep. He apparently stated that Mr. Leach could obtain some type of seizure warrant and go to his banks and seize all the money in the accounts. I advised Mr. Kniep that I was unaware of any Nevada State law that would allow this. Mr. Kniep was in a panic and apparently went to a number of banks and withdrew/closed all of his accounts. He was sure that Mr. Leach was going to take his money. Within a week he gathered his wife's jewelry and proceeded to give it to their children. A few days later, we could not get a hold of Mr. Kniep so I suggested that Mr. Bob Miles, a former First Service Management employee contact the Las Vegas police department and conduct a welfare check. Mr. Miles met the police at his Vistana unit and let them in. He was found in his bed and pronounced dead. A search by the police discovered hordes of cash hidden in his unit.

I had provided attorney McKiever a copy of the documents outlining the deeds of both the NRED investigator, the Deputy Attorney General assigned to NRED and First Service. When I specifically asked Ms. McKiever what was lacking in my numerous exhibits, her response to me was that Mr. Leach was a personal friend of Mr. Leach and he wasn't going to do anything. I am unaware if the Kniep estate is planning on taking any action in this matter. I did provide Ms. McKiever with the same documents I am providing your office. Mr. Boyack knew that I never was paid \$22,000. He had documentation that Michelle Briggs, the Deputy Attorney General assigned to NRED lied. He was aware of the outcome of the 2017 NRED hearing and the fact that Briggs

had asked for a lifetime ban being on any HOA Board. He was aware that Briggs lied to the State Court about the outcome of the hearing. Mr. Boyack received \$1,000's of dollars and failed to protect his clients due to his friendship with Mr. Leach. I do not know if the report I authored was kept in his office or if was shared with outside individuals.

I believe a close review of the facts I am providing will demonstrate that Mr. Leach and Mr. Hastings have submitted to the Courts is false and that Mr. Leach is not working for the best interests of the owners of Vistana.

State of Nevada
Office of Attorney General
555 E. Washington Ave. Suite 3900
Las Vegas, NV 89101

September 6, 2022

Re: Case #18767

I am forwarding additional information concerning my complaint against NRED investigator Christine Pitch and former Deputy Assistant Attorney General Michelle Briggs. In my April 28, 2022 letter to your office I attached a copy of a legal action filed with the Nevada State Courts. This is an update of what the current Vistana BOD has taken against four of the original Vistana BOD that dealt with the numerous entities regarding the theft of over \$19,000,000 from the Vistana HOA.

Our previous Attorney for Vistana was fired by the current BOD after they were elected utilizing false election tactics, via mail fraud. (I have previously identified the U. S, Postal Inspector who can verify this.) The new Vistana Attorney is Mr. John Leach. This is the same John Leach that Mr. Kieth Gregory invited him to a Vistana HOA Board meeting to second his legal opinions regarding the Vistana fraud case. Mr. Leach told the home owners that everything Mr. Gregory told the Vistana owners was correct. Mr. Gregory was sentenced to 10 years in Federal Prison for his part. I believe that Mr. Leach was one of approximately forty individuals who were considered un-indicted co-conspirators. Mr. Leach's law firm has now used Ms. Briggs State Court filings and is suing the previous BOD for over \$174,906.41 and an additional \$26,333.90 against me for demanding and receiving payments from the Vistana HOA. I do not know who determined these facts. It may have been Ms. Briggs or Mr. Leach. I am submitting the specific complaints to determine who filed these charges in State Court. You may notice that I have authorized the Nevada State Bar to forward this information directly to the IRS. I have faith that they will contact either or both of these lawyers to obtain copies of the check or checks that total over \$26,000. I also invite your investigator to do the same.

I believe that if you examine my original Exhibit #9 that was submitted to your office you will see that they are identical. An additional piece of information is that Mr. Kniep hired the law firm of Boyack Orme and Anthony. Mr. Boyack had a complete set of exhibits that were provided to your office. Mr Boyack took \$1,000 of dollars and advised Mr. Kniep that we should all settle Vistana's claim against us and he would do nothing else. Mr. Boyack set up a conference call and talked with both Mr. Kniep and Ardyce Nelson however he did not try and contact the additional two individuals that are being sued, Mr. Fitch and myself. Mr. Boyack advised those he talked with that Mr. Leach was going to seize our bank accounts.

Mr. Kniep panicked and immediately began to get rid of his wife's jewelry and other assets. I spoke with him and tried to advise that I didn't think Mr. Leach would risk his license and arbitrarily take our money knowing that the September 19, 2017 NRED finding was the legal document they lied to the State Court with. Mr. Kniep immediately went to the various banks where he had deposits and withdrew all his money and closed his accounts. He could not sleep nor function and within a few days we could not contact him. A welfare contact was requested from the police and they discovered Mr. Kniep dead in his bed. His money was found through out his condo. A list of individuals knowing his state of mind are being compiled. It should be noted that his estate has sold his Vistana condo yet Mr. Leach is still suing him. I was told by Ms. Colli McKiever, an attorney in Mr. Boyack's law firm, that Mr. Boyack was a friend of Mr. Leach.

The additional packet is included regarding the documents filed with the Eighth Judicial District Court. Please confirm that under findings of fact that they are referring to the September 19, 2017 NRED results concerning the same four individual who they are not only filing against but they in fact have already frozen my Chase Bank checking account and savings account in Long Beach, California. This filing was prepared and filed by Ryan Hastings an attorney in Mr. Leach's law firm. How do I get my money back and what actions are available for myself and the other victims?

As a retired Federal Special Agent, I would believe that 18 USC 1001 would apply to these filings. That is swearing to a false statement in Court. The penalty for this is up to five years in prison. I am available to provide your office with additional documents if needed.



Lynn Williams
3625 Gundry Ave.
Long Beach, CA 90807

THE VISTANA BOARD WHO COMMITTED MAIL FRAUD

Proposed restitution amounts payable to Vistana

STOPPED ALL RECOVERY EFFORTS:

There are two separate amounts of money owed to the Vistana HOA. The first are restitution amounts ordered by the various Federal Judges against the forty two defendants that either pled guilty to the various federal charges perpetrated against the Vistana HOA and the other HOA's in which Silver Lining Construction, LLC committed fraud. The specific amounts will be listed, however the list may not be complete.

The second amount owed to the Vistana HOA is in the amount of \$36, 686,740.20 against various individuals who either pled guilty in Federal Court and have not as of yet settled the claim against them for various amounts of money. Some of these individuals who were not indicted by the courts, however they were found culpable in the Nevada State Court under case NO: 08A578306 in Dept.: XIII.

Individual	Federal Restitution Order	Vistana Request Amount
Leon Benzer	\$13.4 million	Millions
Kieth Gregory	Share of \$12.6 million	Settled
Edith Gillespie	Ordered to pay \$85,780	\$25,000
Michelle DeLuca	Ordered to pay \$10,000	\$15,000
Glenn Brown	Ordered to pay \$5,295	\$10,000
Charles Hawkins	Ordered to pay \$25,826.60	\$35,000
Mary Ann Watts	Ordered to pay \$39,350	\$15,000
Rosalio Alcantar	Ordered to pay \$25,826	\$20,000
Deborah Genato	Ordered to pay \$30,000	\$20,000
Daniel Solomon		\$25,000
Brian Jones	Ordered to pay \$10,000	\$15,000
Patrick Bergsrud		\$26,000
Rudy Alvarez	Ordered to pay \$119,585	\$35,000
Steve Wark		\$15,000
Jeanne Winkler		\$25,000
Mark Kulla		Settled
Jose Louis Alvarez	Ordered to pay \$184,200	\$40,000
Allen Baxter		\$55,000
Lisa Kim		\$100,000
Angela Esparza		\$10,000
Mahin Quintero		\$8,000
Glenn Brown		\$18,000
Tony Wilson		\$22,000

— \$100,000

WE DID HAVE 18 CIVIL LAW SUITS PENDING - GOING TO RECOVER \$600,000
NO EFFORTS TO COLLECT - WHY