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10 **UNITED STATES BANKRUPTCY COURT**
11 **DISTRICT OF NEVADA**

12
13 IN RE GHOLAM REZA JAZI ZANDIAN,
14
15 Debtor in Foreign
16 Proceeding.

CASE NO.: BK-N-16-50644-BTB
CHAPTER 15

17 **OBJECTION TO PETITION FOR RECOGNITION**
18 **AND CHAPTER 15 RELIEF**

19 Jed Margolin, by and through his attorneys Brownstein Hyatt Farber Schreck, hereby files
20 the following objection to the Verified Petition for Recognition of Chapter 15 Relief (“Petition”).
21 As grounds, Mr. Margolin asserts as follows:

22 **I. INTRODUCTION**

23 Jed Margolin is a judgment creditor of Gholam Reza Zandian (“Zandian”) pursuant to a
24 judgment entered on June 24, 2013, by the First Judicial Court of the State of Nevada in Case No.
25 090C005791B. A copy of Mr. Margolin’s judgment is attached hereto as Exhibit A.

26 The petitioner Patrick Canet (the “Petitioner”) is also a judgment creditor of Zandian,
27 based upon a judgment obtained in a French court 18 years ago. The purpose of Chapter 15 is to
28

1 encourage cooperation between the United States and foreign countries with respect to
 2 transnational insolvency cases. Chapter 15 is not intended to, nor does it, elevate the rights of a
 3 foreign judgment creditor ahead of judgment creditors in the United States concerning assets
 4 located in the United States. Yet that is precisely what the Petition attempts to accomplish.
 5 Absent additional evidence, the Chapter 15 relief requested should not be granted by this Court.

6 The Petition is devoid of any evidence that there is a pending insolvency case for Zandian
 7 in France. While it appears there is (or was) a bankruptcy case in France for Computer World, no
 8 such evidence exists for a bankruptcy case for Zandian. Rather the Petitioner was purportedly
 9 appointed the “judicial liquidator” for the benefit of creditors in a proceeding involving Computer
 10 World, formerly known as CEPAT, case no. 989252. In that capacity, the Petitioner, on behalf of
 11 the bankruptcy estate of Computer World, obtained a judgment against Zandian. The Petitioner’s
 12 status as a judgment creditor, however, does not create a cross-border insolvency case. Of equal
 13 importance, there are no assets in Nevada either owned presently or alleged to be related in any
 14 fashion to Computer World. The sole nexus to Nevada is the Computer World Judicial
 15 Liquidator purports to have a judgment against Zandian. This is no different than Jed Margolin’s
 16 judgment against Zandian, except there is no doubt that the latter judgment is not stale or
 17 otherwise unenforceable. As a result there is no just reason why the Petitioner’s judgment against
 18 Zandian should cause this Court to limit other creditors’ claims versus Zandian or their ability to
 19 execute against Zandian’s assets unrelated to Computer World.

20 **II. ARGUMENT**

21 **A. The Petition is Inconsistent With the Purposes of Chapter 15.**

22 The purpose of Chapter 15 of the Bankruptcy Code is set forth in 11 USC § 1501(a). The
 23 Petition seeks relief incongruent with the stated purposes of Chapter 15 because Zandian is not
 24 subject to a cross-border insolvency. In particular, section 1501¹ states in part:

25
 26
 27
 28 ¹ Unless otherwise indicated, all section references herein are to the United States Bankruptcy Code, 11 U.S.C. §§ 101 *et seq.*

1 (a) The purpose of this chapter is to incorporate the Model Law on cross-
 2 border insolvency so as to provide effective mechanisms for dealing with
 3 cases of cross-border insolvency with the objectives of –
 4 (1) cooperation between –
 5 (A) courts of the United States, United States trustees, trustees,
 6 examiners, debtors and debtors in possession; and
 7 (B) the courts and others competent authorities of foreign countries
 8 involved in cross-border insolvency cases;

9 11 U.S.C. § 1501(a) (emphasis added).

10 Case law confirms that the purpose of Chapter 15 is to “facilitate[e] administration of an
 11 insolvency case in a foreign jurisdiction.” *In re Kemsley*, 489 B.R. 346, 359 (Bankr. S.D.N.Y.
 12 2013). “Chapter 15 was implemented by Congress in an attempt to harmonize transnational
 13 insolvency proceedings.” *In re Ran*, 607 F.3d 1017, 1025 (5th Cir. 2010).

14 The Petition does not contain documentation supporting the existence of a cross-border
 15 insolvency case in which Zandian is a debtor within the meaning of section 1502(1). The only
 16 debtor in the cross-border case contained in the Petition is Computer World. Rather than
 17 facilitating any foreign insolvency proceeding involving Zandian, the express objective of the
 18 Petition is to collect upon a judgment obtained by a “judicial liquidator” of Computer World
 19 against Zandian. This is not a proper purpose for a Chapter 15 case.

20 **B. The Petition Does Not Satisfy the Requirements of Section 1515.**

21 Attached to the Verified Petition is a single document in French and translated to English.
 22 The document is titled “Judgment of 3 April 1998.” On the caption, the Plaintiff is denominated
 23 “Canet, Judicial Liquidator of Computer World.” The Defendant is Zandian. Since the
 24 Petitioner’s capacity is as the “Judicial Liquidator of Computer World,” the insolvency case is, by
 25 the very terms of the judgment, one involving Computer World, not Zandian. To the extent
 26 Computer World had assets in the United States, Chapter 15 would be applicable such that relief
 27 could be granted under Section 1511 to ensure cooperation between the Courts of France and the
 28

1 United States. Here, however, the judgment confirms that the Petition is being misused merely to
2 gain priority over—or otherwise impede execution of—the judgment obtained by Jed Margolin.

3 The judgment recites in pertinent part:

4 Following the adjournments, the matter was argued at the hearing of
5 6 March 1998, during which Mr. Canet, Esq., in his official capacity,
6 appearing through Mr. Gayraud, Esq., developed the terms of his
7 document instituting proceedings. He recalls that by judgment rendered
8 by this Commercial Court dated 12 June 1992, Computer World formerly
9 called CEPAT, was admitted to the benefit of reorganization proceedings.

10 On 11 June 1993, this reorganization had been converted into judicial
11 liquidation and Mr. Canet, Esq., appointed to the duties of liquidator and
12 representative of the creditors.

13 He states that in connection with his duties, he summoned Mr. Zandian,
14 Chairman and General Manager and 48% shareholder, for the purposes of
15 having a pecuniary sanction ordered against him derived from Article 180
16 of the Law of 25 January 1985.

17 Indeed, Mr. Zandian was guilty of a certain number of acts justifying that
18 a sanction be ordered against him for repayment of the company's
19 liabilities out of his own assets. [complement de passif]

20 Following a judgment rendered by the 6th Chamber of this Court on 13
21 June 1997, Mr. Canet, Esq.'s claim was allowed. Mr. Zandian was
22 ordered to personally assume the debts of the company up to the amount
23 of \$20,000,000 francs. ...

24 ON THESE GROUNDS: ... Appoints Mr. Canet, Esq., 1 Rue De La
25 Citadelle 93500 Pontoise, as liquidator.

26 Grants the creditors a time limit of 2 months as from publication of this
27 judgment in the BODACC [official bulletin of civil and commercial
28 notices] to file their proofs of claim.

Declares that the time limit granted to the judicial liquidator for drawing
up the list of creditors is 10 months as from expiry of the above time limit
set for proofs of claims.

Requests the employees to appoint a representative from within the
company under the conditions provided by Article 148-1 of the Law.

Declares that the report of appointment or failure to do so shall be filed
forthwith with the Clerk's office in accordance with Article 15, 2nd
paragraph of the Decree of 27 December 1985, as amended...

26 The Petition is devoid of any evidence that there is an ongoing insolvency or liquidation
27 proceeding against Zandian. Even presuming that the documents attached to the Petition are
28 authentic, they are all at least 18 years old. Therefore, even if they were valid in 1998, one cannot

1 assume they are currently valid. There is no case number of a pending liquidation or insolvency
2 case against Zandian. There is no docket sheet or pleading reflecting activity during the past 18
3 years. It is questionable whether the Judgment of 3 April 1998 is even viable, as there is no
4 certification indicating that this 18-year-old judgment is still valid. It requires a leap of faith to
5 accept that the person purporting to be Mr. Canet actually is Mr. Canet and that he is still
6 authorized to act as liquidator.

7 **C. Zandian's Suspicious Activities.**

8 The facts and circumstances surrounding Zandian's illicit activities, as well as the glaring
9 omissions in the materials provided herein, should cause this Court to be extremely suspicious
10 about this Chapter 15. Various courts have determined Zandian engaged in bad faith litigation
11 and linked him to "forged" patent assignments. Most recently, Zandian attempted to bribe
12 counsel for Jed Margolin. As a result, there is an insufficient basis to trust that Mr. Canet is
13 actually bringing this action or that the Computer World insolvency proceeding is still an active
14 case.

15 In 1993, US Federal Agents arrested Zandian for attempting to illegally export one of
16 IBM's most powerful computers to Iran. Although Zandian was not convicted of criminal
17 charges, the Administrative Law Judge denied Zandian all export privileges for a period of 10
18 years related to his activities. Jed Margolin has been pursuing Zandian for many years, including
19 obtaining a judgment against him. See Exhibit A (Order Denying Zandian's Motion to Set Aside
20 Default Judgment), wherein Judge James T. Russell describes abuse of process by Zandian as
21 well as Zandian's involvement with filing forged patent assignment documents. More recently,
22 Jed Margolin prosecuted an action for a series of fraudulent conveyances Zandian made to family
23 and insiders after Mr. Margolin obtained his judgment against Zandian. A copy of the Motion to
24 Void Deeds, Assigned Property, for Writ of Execution and to Convey is attached hereto as
25 Exhibit B. The attached motion also details Zandian's attempt to bribe counsel for Mr. Margolin
26 to stop Mr. Margolin's efforts to execute on his judgment. If bribery, forgery and abuse of
27 process is in Zandian's repertoire, then impersonating a judicial liquidator is not out of the
28 question.

1 It is highly suspicious that after 18 years, someone purporting to be a liquidator for a
2 company long since closed attempts to intervene in Nevada just as Jed Margolin is closing in on
3 assets fraudulently conveyed. The properties which are subject to the fraudulent conveyance
4 actions have been titled in Zandian's name for over 10 years. Despite this, Mr. Canet took no
5 action to collect the judgment that he obtained in France until he filed the Verified Petition.
6 Given the suspicious timing of the Petition, the Court should closely scrutinize all arguments
7 made and documents offered in support thereof.

8 Again, there is no evidence provided that the Judgment of 3 April 1998 is even viable
9 after 18 years. The Petitioner would have this Court believe that a "judicial liquidator" for
10 Computer World would lay dormant for 18 years only to be miraculously revived in the heels of a
11 Nevada fraudulent conveyance action. Perhaps most noteworthy, the judgment states that "Mr.
12 Zandian was ordered to personally assume the debts of the company up to the amount of
13 \$20,000,000 francs." France officially converted to the Euro in February 2002. The Bank of
14 France stopped exchanging all Francs for Euros on February 17, 2012. If the Judgment was still
15 viable, it would have had to have been transformed by a Court to a currency presently in
16 existence. It is noteworthy that the materials appended to the Petition contain only those
17 documents which could have been pirated from the 18 year old case.

18 **D. The Petition Fails to Meet the Requirements of Bankruptcy Rule 1007(a)(4).**

19 In addition to being substantively flawed and highly suspicious, the Petition is also
20 procedurally deficient. Bankruptcy Rule 1007(a)(4) requires that the following documents be
21 filed with the petition, unless the Court orders otherwise: "a list containing the names and
22 addresses of all persons or bodies authorized to administer foreign proceedings of the debtor, all
23 parties to litigation pending in the United States in which the debtor is a party at the time of the
24 filing of the petition, and all entities against whom provisional relief is being sought under § of
25 the Code." Fed. R. Bankr. P. 1007(a)(4). The purpose of these requirements is to ensure that
26 entities with an interest in the case receive appropriate notice. *See* COLLIER ON BANKRUPTCY
27 ¶ 1007.02[4] (Alan N. Resnick & Henry J. Sommer eds., 16th ed.).
28

1 Here, the foreign representative did not file the materials required under Rule 1007.
2 Attached to the petition are photocopies of the attorney license cards of Mr. Canet and his French
3 attorney, Jean-Marie Hyest. There is no representation, however, that Messrs. Canet and Hyest
4 constitute “all persons or bodies authorized to administer foreign proceedings of the debtor.”
5 More importantly, the foreign representative failed to list parties to U.S.-based litigation and
6 parties against whom provisional relief is sought. The Court thus had no means of notifying such
7 parties of the petition pursuant to Bankruptcy Rule 2002(q). Given the distinct possibility that
8 key parties in interest did not receive notice of the Petition, the Court should not recognize the
9 foreign proceeding.

10 **E. Order Granting Recognition Should Not Enter.**

11 For the same reasons set forth above, the Petition fails to meet the criteria established for
12 an order granting recognition under 11 U.S.C. §1517. For instance, the Petition does not establish
13 that there is a foreign main proceeding as defined in 11 U.S.C. §1502(4) because there are no
14 allegations that France is currently (or has been for the past 18 years) the center of Zandian’s
15 main interests. Because the materials accompanying the Petition relate to the late 1990s, there are
16 no allegations that Zandian maintains any business interests in France. Thus, France may not
17 even be a foreign non-main proceeding under 11 U.S.C. §1502(5).

18 **F. Reservation of Rights.**

19 To the extent the Petitioner can prove he is still authorized under French law to pursue the
20 Judgment of 3 April 1998, Jed Margolin does not object to granting Petitioner access to Court
21 under 11 U.S.C. §1509(b) to sue or be sued. In addition, Jed Margolin reserves his right to raise
22 any other objections under Chapter 15 at the hearing scheduled for 10:00 a.m. on June 23, 2016.

23 WHEREFORE, Mr. Margolin respectfully requests that this Court enter an order denying
24 the Petition for Recognition.
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DATED this 16th day of June, 2016

BROWNSTEIN HYATT FARBER
SCHRECK, LLP

By: /s/ Arthur A. Zorio

Arthur A. Zorio
Nevada Bar No. 6547
5371 Kietzke Lane
Reno, NV 89511

By: /s/ Steven E. Abelman

Steven E. Abelman
Colorado Bar No. 13980
(*pro hac vice* admission pending)
410 Seventeenth Street, Suite 2200
Denver, CO 80202-4432

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of June, 2016, the foregoing **OBJECTION TO PETITION FOR RECOGNITION AND CHAPTER 15 RELIEF** was electronically filed with the Court using the CM/ECF system, which sent notification to all parties in interest participating in the CM/ECF system and was served by placing same via first class mail postage prepaid properly addressed to all parties identified on the attached mailing matrix.

/s/ Sheila M. Grisham
Sheila M. Grisham

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Label Matrix for local noticing
0978-3
Case 16-50644-btb
District of Nevada
Reno
Thu Jun 16 09:19:42 PDT 2016

KAEMPFER CROWELL
50 W. Liberty Street, Suite 700
Reno, NV 89501-1947

United States Bankruptcy Court
300 Booth Street
Reno, NV 89509-1360

(p)INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA PA 19101-7346

INTERNAL REVENUE SERVICE
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Louis M. Bubala III
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NEVADA DEPARTMENT OF MOTOR VEHICLES
BANKRUPTCY SECTION
555 WRIGHT WAY
CARSON CITY, NV 89711-0001

NEVADA DEPT. OF EMPLOYMENT SECURITY
500 E. THIRD STREET
CARSON CITY, NV 89713-0002

NEVADA DEPT. OF TAXATION
BANKRUPTCY SECTION
4600 KIETZKE LANE, #L-235
RENO, NV 89502-5045

SEVERIN A. CARLSON, ESQ.
TARA C. ZIMMERMAN, ESQ.
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510 W. FOURTH STREET
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UNITED STATES TRUSTEE
300 BOOTH STREET, SUITE 3009
RENO, NV 89509-1360

JEFFREY L HARTMAN
HARTMAN & HARTMAN
510 WEST PLUMB LANE, STE B
RENO, NV 89509-3693

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
OGDEN, UT 84201-0030

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)PATRICK CANET
1 RUE DE LA CITADELLE
95300 PONTOISE
00000

End of Label Matrix
Mailable recipients 12
Bypassed recipients 1
Total 13

EXHIBIT A

Matthew D. Francis (6978)
Adam P. McMillen (10678)
WATSON ROUNDS
5371 Kietzke Lane
Reno, NV 89511
Telephone: 775-324-4100
Facsimile: 775-333-8171
Attorneys for Plaintiff Jed Margolin

REC'D & FILED

2013 JUN 24 PM 4:12

ALAN GLOVER
BY *Alan Glover* CLERK
DEPUTY

**In The First Judicial District Court of the State of Nevada
In and for Carson City**

JED MARGOLIN, an individual,

Plaintiff,

vs.

OPTIMA TECHNOLOGY CORPORATION,
a California corporation, OPTIMA
TECHNOLOGY CORPORATION, a Nevada
corporation, REZA ZANDIAN aka
GOLAMREZA ZANDIANJAZI aka GHOLAM
REZA ZANDIAN aka REZA JAZI aka J. REZA
JAZI aka G. REZA JAZI aka GHONONREZA
ZANDIAN JAZI, an individual, DOE Companies
1-10, DOE Corporations 11-20, and DOE
Individuals 21-30,

Defendants.

Case No.: 090C00579 1B

Dept. No.: 1

DEFAULT JUDGMENT

WHEREAS Plaintiff JED MARGOLIN filed an Amended Complaint in this action on August 11, 2011. On March 5, 2012, REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI aka G. REZA JAZI aka GHONONREZA ZANDIAN JAZI ("Zandian") served a General Denial to the Amended Complaint. On March 13, 2012, OPTIMA TECHNOLOGY CORPORATION, a California corporation, OPTIMA TECHNOLOGY CORPORATION, a Nevada corporation, served a General Denial to the Amended Complaint.

1 WHEREAS on June 28, 2012, this Court issued an order requiring the corporate
2 Defendants to retain counsel and that counsel must enter an appearance on behalf of the
3 corporate Defendants by July 15, 2012. If no such appearance was entered, the June 28, 2012
4 order said that the corporate Defendants' General Denial shall be stricken. Since no
5 appearance was made on their behalf, a default was entered against them on September 24,
6 2012. A notice of entry of default judgment was filed on November 6, 2012.

7 WHEREAS on January 15, 2013, this Court issued an order striking the General Denial
8 of Zandian and awarding his fees and costs incurred in bringing the motion to strike. A default
9 was entered against Zandian on March 28, 2013. A notice of entry of default judgment was
10 filed on April 5, 2013.

11 WHEREAS Defendants are not infants or incompetent persons and are not in the
12 military service of the United States as defined by 50 U.S.C. § 521.

13 WHEREAS the allegations in Plaintiff's Amended Complaint warrant entry of final
14 judgment against all named Defendants for conversion, tortious interference with contract,
15 intentional interference with prospective economic advantage, unjust enrichment, and unfair
16 and deceptive trade practices.

17 WHEREAS all Defendants are jointly and severally liable to Plaintiff for the principal
18 amount of \$1,495,775.74.

19 THEREFORE, Judgment is hereby entered for Plaintiff and against Defendant Zandian
20 and Defendants Optima Technology Corporation, a Nevada corporation, and Optima
21 Technology Corporation, a California corporation, for damages, along with pre-judgment
22 interest, attorney's fees and costs in the amount of \$1,495,775.74, plus interest at the legal rate,
23 pursuant to NRS 17.130, thereon from the date of default until the judgment is satisfied.

24 ///

25 ///

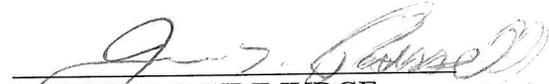
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JUDGMENT is hereby entered against Defendant Zandian and Defendants Optima Technology Corporation, a Nevada corporation, and Optima Technology Corporation, a California corporation, in favor of Plaintiff this 24th day of June, 2013.


DISTRICT COURT JUDGE

1 Matthew D. Francis (6978)
2 Adam P. McMillen (10678)
3 WATSON ROUNDS
4 5371 Kietzke Lane
5 Reno, NV 89511
6 Telephone: 775-324-4100
7 Facsimile: 775-333-8171
8 *Attorneys for Plaintiff Jed Margolin*

REC'D & FILED
2014 FEB 10 PM 3:19
ALAN GLOVER
V. Alegria CLERK
BY _____
DEPUTY

7 **In The First Judicial District Court of the State of Nevada**
8 **In and for Carson City**

10 **JED MARGOLIN, an individual,**

11 **Plaintiff,**

12 **vs.**

13 **OPTIMA TECHNOLOGY CORPORATION,**
14 **a California corporation, OPTIMA**
15 **TECHNOLOGY CORPORATION, a Nevada**
16 **corporation, REZA ZANDIAN**
17 **aka GOLAMREZA ZANDIANJAZI**
18 **aka GHOLAM REZA ZANDIAN**
19 **aka REZA JAZI aka J. REZA JAZI**
20 **aka G. REZA JAZI aka GHONONREZA**
21 **ZANDIAN JAZI, an individual, DOE**
22 **Companies 1-10, DOE Corporations 11-20,**
23 **and DOE Individuals 21-30,**

24 **Defendants.**

Case No.: 090C00579 1B

Dept. No.: 1

NOTICE OF ENTRY OF ORDER

25 TO: All parties:

26 **PLEASE TAKE NOTICE** that on February 6, 2014, the Court entered its Order
27 Denying Defendant Reza Zandian aka Golamreza Zandianjazi aka Gholam Reza Zandian aka
28 Reza Jazi aka J. Reza Jazi aka G. Reza Jazi aka Ghononreza Zandian Jazi's Motion to Set

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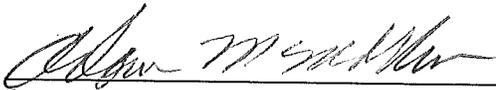
1 Aside Default Judgment. Attached as Exhibit 1 is a true and correct copy of such Order.

2 **Affirmation Pursuant to NRS 239B.030**

3 The undersigned does hereby affirm that the preceding document does not contain the
4 social security number of any person.

5 DATED: February 7, 2014.

WATSON ROUNDS

6
7 By: 

8 Matthew D. Francis

Adam P. McMillen

9 Watson Rounds

5371 Kietzke Lane

10 Reno, NV 89511

Attorneys for Plaintiff Jed Margolin

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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of Watson Rounds, and that on this date, I deposited for mailing, in a sealed envelope, with first-class postage prepaid, a true and correct copy of the foregoing document, **Notice of Entry of Order**, addressed as follows:

Johnathon Fayeghi, Esq.
Hawkins Melendrez
9555 Hillwood Dr., Suite 150
Las Vegas, NV 89134
Counsel for Reza Zandian

Optima Technology Corp.
A California corporation
8401 Bonita Downs Road
Fair Oaks, CA 95628

Optima Technology Corp.
A Nevada corporation
8401 Bonita Downs Road
Fair Oaks, CA 95628

Optima Technology Corp.
A California corporation
8775 Costa Verde Blvd. #501
San Diego, CA 92122

Optima Technology Corp.
A Nevada corporation
8775 Costa Verde Blvd. #501
San Diego, CA 92122

Dated: February 10th, 2014.

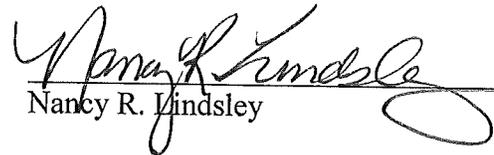

Nancy R. Lindsley

Exhibit 1

Exhibit 1

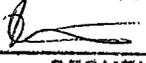
1 Case No.: 09 OC 00579 1B

2 Dept. No.: 1

REC'D & FILED

2014 FEB -6 AM 8: 51

ALAN GLOVER

BY  CLERK
DEPUTY

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7 **In The First Judicial District Court of the State of Nevada**
8 **In and for Carson City**

9
10 **JED MARGOLIN, an individual,**

11 **Plaintiff,**

12 **vs.**

13 **OPTIMA TECHNOLOGY CORPORATION,**
14 **a California corporation, OPTIMA**
15 **TECHNOLOGY CORPORATION, a Nevada**
16 **corporation, REZA ZANDIAN**
17 **aka GOLAMREZA ZANDIANJAZI**
18 **aka GHOLAM REZA ZANDIAN**
19 **aka REZA JAZI aka J. REZA JAZI**
20 **aka G. REZA JAZI aka GHONONREZA**
21 **ZANDIAN JAZI, an individual, DOE**
22 **Companies 1-10, DOE Corporations 11-20,**
23 **and DOE Individuals 21-30,**

24 **Defendants.**

ORDER DENYING DEFENDANT
REZA ZANDIAN AKA GOLAMREZA
ZANDIANJAZI AKA GHOLAM REZA
ZANDIAN AKA REZA JAZI AKA J.
REZA JAZI AKA G. REZA JAZI AKA
GHONONREZA ZANDIAN JAZI'S
MOTION TO SET ASIDE DEFAULT
JUDGMENT

25 This matter comes before the Court on REZA ZANDIAN aka GOLAMREZA
26 ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI aka G.
27 REZA JAZI aka GHONONREZA ZANDIAN JAZI's ("Zandian") Motion to Set Aside
28 Default Judgment, dated December 19, 2013. Plaintiff Jed Margolin filed an Opposition to Set
Aside Default Judgment on January 19, 2014. Zandian served a reply in support of the Motion
to Set Aside on January 23, 2014. Based upon the following facts and conclusions of law,
Zandian's Motion to Set Aside is DENIED.

\\

I. FACTUAL BACKGROUND

1
2 Plaintiff Jed Margolin is the named inventor on United States Patent No. 5,566,073
3 (“the ‘073 Patent”), United States Patent No. 5,904,724 (“the ‘724 Patent”), United States
4 Patent No. 5,978,488 (“the ‘488 Patent”) and United States Patent No. 6,377,436 (“the ‘436
5 Patent”) (collectively “the Patents”). See Amended Complaint, filed 8/11/11, ¶¶ 9-10. In
6 2004, Mr. Margolin granted to Robert Adams, then CEO of Optima Technology, Inc. (later
7 renamed Optima Technology Group (hereinafter “OTG”), a Cayman Islands Corporation
8 specializing in aerospace technology) a Power of Attorney regarding the Patents. *Id.* at ¶ 11.
9 Subsequently, Mr. Margolin assigned the ‘073 and ‘724 Patents to OTG and revoked the
10 Power of Attorney. *Id.* at ¶ 13.

11 In May 2006, OTG and Mr. Margolin licensed the ‘073 and ‘724 Patents to Geneva
12 Aerospace, Inc., and Mr. Margolin received a royalty payment pursuant to a royalty agreement
13 between Mr. Margolin and OTG. *Id.* at ¶ 12. On or about October 2007, OTG licensed the
14 ‘073 Patent to Honeywell International, Inc., and Mr. Margolin received a royalty payment
15 pursuant to a royalty agreement between Mr. Margolin and OTG. *Id.* at ¶ 14.

16 On or about December 5, 2007, Zandian filed with the U.S. Patent and Trademark
17 Office (“USPTO”) assignment documents allegedly assigning all four of the Patents to Optima
18 Technology Corporation (“OTC”), a company apparently owned by Zandian at the time. *Id.* at
19 ¶ 15. Shortly thereafter, on November 9, 2007, Mr. Margolin, Robert Adams, and OTG were
20 named as defendants in the case titled *Universal Avionics Systems Corporation v. Optima
21 Technology Group, Inc.*, No. CV 07-588-TUC-RCC (the “Arizona action”). *Id.* at ¶ 17.
22 Zandian was not a party in the Arizona action. Nevertheless, the plaintiff in the Arizona action
23 asserted that Mr. Margolin and OTG were not the owners of the ‘073 and ‘724 Patents, and
24 OTG filed a cross-claim for declaratory relief against Optima Technology Corporation
25 (“OTC”) in order to obtain legal title to the respective patents. *Id.*

26 On August 18, 2008, the United States District Court for the District of Arizona
27 entered a default judgment against OTC and found that OTC had no interest in the ‘073 or
28 ‘724 Patents, and that the assignment documents filed with the USPTO were “forged, invalid,

1 void, of no force and effect.” *Id.* at ¶ 18; *see also* Exhibit B to Zandian’s Motion to Dismiss,
2 dated 11/16/11, on file herein.

3 Due to Zandian’s acts, title to the Patents was clouded and interfered with Plaintiff’s
4 and OTG’s ability to license the Patents. *Id.* at ¶ 19. In addition, during the period of time Mr.
5 Margolin worked to correct record title of the Patents in the Arizona action and with the
6 USPTO, he incurred significant litigation and other costs associated with those efforts. *Id.* at ¶
7 20.

8 II. PROCEDURAL BACKGROUND

9 Plaintiff filed his Complaint on December 11, 2009, and the Complaint was personally
10 served on Zandian on February 2, 2010, and on Defendants Optima Technology Corporation, a
11 Nevada corporation, and Optima Technology Corporation, a California corporation on March
12 21, 2010. Zandian’s answer to Plaintiff’s Complaint was due on February 22, 2010, but
13 Zandian did not answer the Complaint or respond in any way. Default was entered against
14 Zandian on December 2, 2010, and Plaintiff filed and served a Notice of Entry of Default on
15 Zandian on December 7, 2010 and on his last known attorney on December 16, 2010.

16 The answers of Defendants Optima Technology Corporation, a Nevada corporation,
17 and Optima Technology Corporation, a California corporation, were due on March 8, 2010,
18 but Defendants did not answer the Complaint or respond in any way. Default was entered
19 against Defendants Optima Technology Corporation, a Nevada corporation, and Optima
20 Technology Corporation, a California corporation on December 2, 2010. Plaintiff filed and
21 served a Notice of Entry of Default on the corporate entities on December 7, 2010 and on their
22 last known attorney on December 16, 2010.

23 The defaults were set aside and Zandian’s motion to dismiss was denied on August 3,
24 2011. On September 27, 2011, this Court ordered that service of process against all
25 Defendants may be made by publication. As manifested by the affidavits of service, filed
26 herein on November 7, 2011, all Defendants were duly served by publication by November
27 2011.

28

1 On February 21, 2012, the Court denied Zandian's motion to dismiss the Amended
2 Complaint. On March 5, 2012, Zandian served a General Denial to the Amended Complaint.
3 On March 13, 2012, the corporate Defendants served a General Denial to the Amended
4 Complaint.

5 On June 28, 2012, this Court issued an order requiring the corporate Defendants to
6 retain counsel and that counsel enter an appearance on behalf of the corporate Defendants by
7 July 15, 2012. The June 28, 2012 order further provided that if no such appearance was
8 entered, the corporate Defendants' General Denial would be stricken. Since no appearance
9 was their behalf of the corporate Defendants, a default was entered against them on September
10 24, 2012. A notice of entry of default judgment was filed and served on November 6, 2012.

11 On July 16, 2012, Mr. Margolin served Zandian with Mr. Margolin's First Set of
12 Requests for Admission, First Set of Interrogatories, and First Set of Requests for Production
13 of Documents, but Zandian never responded to these discovery requests. As such, on
14 December 14, 2012, Mr. Margolin filed and served a Motion for Sanctions pursuant to NRC
15 37. In this Motion, Mr. Margolin requested this Court strike the General Denial of Zandian,
16 and award Mr. Margolin his fees and costs incurred in bringing the Motion.

17 On January 15, 2013, this Court issued an order striking the General Denial of Zandian
18 and awarding his fees and costs incurred in bringing the NRC 37 Motion. A default was
19 entered against Zandian on March 28, 2013, and a notice of entry of default judgment was
20 filed and served on April 5, 2013.

21 On April 17, 2013, Mr. Margolin filed an Application for Default Judgment, which was
22 served on Zandian and the corporate Defendants. Since Zandian did not respond to the
23 Application for Default Judgment, a Default Judgment was entered on June 24, 2013. Notice
24 of entry of the Default Judgment was served on Zandian on June 26, 2013 and filed on June
25 27, 2013.

26 Over five and a half months later, on December 19, 2013, Zandian served his Motion
27 to Set Aside on Plaintiff. Zandian's Motion to Set Aside claims that he never received any
28 written discovery or notice of the pleadings and papers filed in this matter after his counsel

1 withdrew as his former counsel provided an erroneous last known address to the Court and the
2 parties when he withdrew, and therefore Zandian requests that the judgment be set aside.

3 III. FINDINGS AND CONCLUSIONS OF LAW

4 A party seeking to set aside a default judgment has the burden to prove mistake,
5 inadvertence, surprise, or excusable neglect by a preponderance of the evidence. *Kahn v.*
6 *Orme*, 108 Nev. 510, 513–14, 835 P.2d 790, 793 (1992). The Court finds that Zandian has not
7 met the burden to prove mistake, inadvertence, surprise, or excusable neglect by a
8 preponderance of the evidence.

9 Specifically, Zandian has not met the factors set forth in *Kahn* to compel the court to
10 set aside the judgment. *Id.* at 513, 835 P.2d at 792–93 (holding that the district court must
11 consider whether the party moving to set aside a judgment promptly applied to remove the
12 judgment, lacked intent to delay the proceedings, lacked knowledge of the procedural
13 requirements, and demonstrated good faith, in addition to considering the state's underlying
14 policy of resolving cases on the merits). Zandian failed to promptly apply for relief, has not
15 established a lack of intent to delay these proceedings or a lack of knowledge of the procedural
16 requirements, and did not provide a good-faith reason for the over five-and-a-half-month gap
17 between entry of default and the time he obtained new counsel and filed the Motion to Set
18 Aside Default Judgment.

19 a. Zandian Did Not Promptly Apply To Remove The Judgment

20 Even though a motion to set aside a judgment may be filed within the six month
21 deadline provided for in NRCP 60(b), a party can still fail to act promptly. *See Kahn* 108 Nev.
22 at 514, 835 P.2d at 793. Therefore, “want of diligence in seeking to set aside a judgment is
23 ground enough for denial of such a motion.” *Id.* (citing *Union Petrochemical Corp. v. Scott*,
24 96 Nev. 337, 339, 609 P.2d 323, 324 (1980) (citing *Lentz v. Boles*, 84 Nev. 197, 438 P.2d 254
25 (1968); *Hotel Last Frontier v. Frontier Prop.*, 79 Nev. 150, 380 P.2d 293 (1963))).

26 Despite his knowledge of the default judgment, Zandian did not move to have the
27 judgment set aside until nearly six months after its entry. Although Zandian argues he did not
28 receive notice of the various proceedings, notice was mailed to his address. Therefore, the

1 notice requirement of NRCP 55 was fulfilled as Plaintiff served written notice of the
2 application for default judgment. Moreover, NRCP 55 is likely not implicated since the
3 judgment ultimately resulted from sanctions arising from Zandian's failure to respond to
4 discovery. *See Durango Fire Protection, Inc. v. Troncoso*, 120 Nev. 658 (2004) (trial court's
5 entry of judgment for plaintiff, in action for breach of contract, after striking defendant's
6 answer was a sanction for defendant's failure to appear at several hearings and calendar calls
7 rather than a default judgment, and thus, civil procedure rule requiring written notice before
8 entry of default judgment was not applicable).

9 Further, First Judicial District Court Rule 22(3) expressly states that "[a]ny form of
10 order permitting withdrawal of an attorney submitted to the Court for signature shall contain
11 the address at which the party is to be served with notice of all further proceedings." Plaintiff
12 had a right to rely on the address given by Zandian's prior attorney.

13 No evidence supports Zandian's claims that he lacked knowledge of this matter. Even
14 if Zandian was living in France, for which no competent evidence has been provided to this
15 Court, Zandian was required to provide the Court and the parties with his new address.
16 However, Zandian never informed this Court or the parties of any address change. The record
17 demonstrates that the Plaintiff's discovery requests, motions, application for judgment, orders
18 and notice of judgment were all mailed to Zandian's address of record. Under NRCP 5(b),
19 service by mail is complete upon mailing. Thus, Zandian received notice of the proceedings
20 and his repeated failure to respond constituted inexcusable neglect.

21 **b. Zandian Has Failed To Show He Lacked Intent To Delay**

22 Zandian received all of the papers and pleadings in this matter. However, he failed to
23 respond to Plaintiff's discovery and willfully ignored the proceedings of this matter. In fact,
24 Zandian waited nearly six months to secure new counsel and file the motion to set aside.
25 Furthermore, Zandian failed to file an opposition to the application for judgment.
26 Accordingly, the Court finds that Zandian has failed to establish the absence of an intent to
27 delay.

28 **c. Whether Zandian Lacked Knowledge Of Procedural Requirements**

1 Zandian unquestionably had notice of the written discovery, motions and orders filed in
2 this matter, and yet he ignored all of these documents. All that was required of Zandian was to
3 either personally respond to the discovery and motions or obtain counsel to appear on his
4 behalf. Zandian knew discovery had been served but deliberately chose to ignore it. Zandian
5 knew a motion for sanctions and an application for judgment had been filed, which led to the
6 judgment, but Zandian chose to ignore those items as well. Zandian's failure to obtain new
7 counsel or otherwise act on his own behalf is inexcusable. *See Kahn* 108 Nev. at 514-15, 835
8 P.2d at 793-4. As the Nevada Supreme Court stated in *Kahn*:

9 we are not confronted here with some subtle or technical aspect of
10 procedure, ignorance of which could readily be excused. The requirements
11 of the rule are simple and direct. *To condone the actions of a party who has*
12 *sat on its rights only to make a last-minute rush to set aside judgment would*
be to turn NRCP 60(b) into a device for delay rather than the means for
relief from an oppressive judgment that it was intended to be.

13 *Id.* (citing *Union*, 96 Nev. at 339, 609 P.2d at 324 (citing *Franklin v. Bartsas Realty, Inc.*, 95
14 Nev. 559, 598 P.2d 1147 (1979); *Central Operating Co. v. Utility Workers of America*, 491
15 F.2d 245 (4th Cir.1974)) (emphasis added in original)).

16 Zandian had sufficient knowledge to act responsibly. He had previously retained
17 counsel to defend this action and retained new counsel to set aside the judgment. Therefore,
18 this Court cannot conclude that Zandian failed to respond to set aside the default judgment
19 because he was ignorant of procedural requirements.

20
21 **d. Whether Zandian Acted In Good Faith**

22 Zandian has not provided any valid reason for failing to respond to the requested
23 discovery, the motion for sanctions or the application for judgment. Furthermore, he has not
24 provided a reasonable explanation for waiting over five months to obtain other counsel despite
25 having knowledge of the judgment entered against him.

26
27 Based upon the fact that Zandian knew about this case and continued to receive the
28 papers and pleadings from this matter, it was inexcusable for Zandian not to respond to the

1 earlier discovery requests and motions. Zandian has not demonstrated good faith. In fact,
2 Zandian has only demonstrated inexcusable neglect by his willful failure to respond to, and
3 participate in, this action. Accordingly, the Court determines that Zandian lacked good faith in
4 contesting this action.

5 **e. Whether This Case Should Be Tried On The Merits For Policy Reasons**

6 The Nevada Supreme Court has held that “good public policy dictates that cases be
7 adjudicated on their merits.” *See Kahn* 108 Nev. at 516, 835 P.2d at 794 (citing *Hotel Last*
8 *Frontier v. Frontier Prop.*, 79 Nev. 150, 155–56, 380 P.2d 293, 295 (1963) (original
9 emphasis). However, this policy has its limits:
10

11 We wish not to be understood, however, that this judicial tendency to grant
12 relief from a default judgment implies that the trial court should always
13 grant relief from a default judgment. Litigants and their counsel may not
14 properly be allowed to disregard process or procedural rules with impunity.
Lack of good faith or diligence, or lack of merit in the proposed defense,
may very well warrant a denial of the motion for relief from the judgment.

15 *Id.* (citing *Lentz v. Boles*, 84 Nev. 197, 200, 438 P.2d at 256 (1968)).

16 Zandian has disregarded the process and procedural rules of this matter with impunity.
17 He has repeatedly ignored this matter and failed to respond to the written discovery and
18 motions in this matter since his former attorney John Peter Lee withdrew from representation.
19 Zandian’s lack of good faith or diligence warrants a denial of the motion to set aside.

20 Zandian’s complete failure to respond to the discovery requests and subsequent
21 motions evidences his willful and recalcitrant disregard of the judicial process, which
22 prejudiced Plaintiff. *Foster v. Dingwall*, 227 P.3d 1042, 1049 (Nev. 2010) (citing *Hamlett v.*
23 *Reynolds*, 114 Nev. 863, 865, 963 P.2d 457, 458 (1998) (upholding the district court’s strike
24 order where the defaulting party’s “constant failure to follow [the court’s] orders was
25 unexplained and unwarranted”); *In re Phenylpropanolamine (PPA) Products*, 460 F.3d 1217,
26 1236 (9th Cir.2006) (holding that, with respect to discovery abuses, “[p]rejudice from
27 unreasonable delay is presumed” and failure to comply with court orders mandating discovery
28 “is sufficient prejudice”).

1 In light of Zandian's repeated and continued abuses, the policy of adjudicating cases on
2 the merits would not be furthered in this case, and the ultimate sanctions are necessary to
3 demonstrate to Zandian and future litigants that they are not free to act with wayward
4 disregard of a court's orders. *Foster*, 227 P.3d at 1049. Moreover, Zandian's failure to oppose
5 Plaintiff's motion to strike the General Denial or the application for judgment constitutes an
6 admission that the motion and application were meritorious. *Id.* (citing *King v. Carlidge*, 121
7 Nev. 926, 927, 124 P.3d 1161, 1162 (2005) (stating that an unopposed motion may be
8 considered as an admission of merit and consent to grant the motion) (citing DCR 13(3)).

9 **IV. CONCLUSION**

10 The record provides substantial evidence to support this denial of Zandian's motion to
11 set aside. Further, the policy of resolving cases on the merits does not allow litigants "to
12 disregard process or procedural rules with impunity." *Kahn*, 108 Nev. at 516, 835 P.2d at 794
13 (quoting *Lentz v. Boles*, 84 Nev. 197, 200, 438 P.2d 254, 256-57 (1968)).

14 Zandian has failed to show mistake, inadvertence, surprise or excusable neglect
15 pursuant to NRCP 60(b). Zandian had every opportunity to properly defend this action and
16 instead made a voluntary choice not to. Therefore, Zandian's motion to set aside is hereby
17 DENIED.

18
19 DATED: This 6th day of February, 2014. IT IS SO ORDERED:

20
21 
22 JAMES T. RUSSELL
23 DISTRICT COURT JUDGE
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CERTIFICATE OF MAILING

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I hereby certify that on the 6 day of February, 2014, I placed a copy of the foregoing in the United States Mail, postage prepaid, addressed as follows:

Matthew D. Francis
Adam P. McMillen
Watson Rounds
5371 Kietzke Lane
Reno, NV 89511

Geoffrey W. Hawkins
Johnathon Fayeghi
Hawkins Melendrez, P.C.
9555 Hillwood Drive, Suite 150
Las Vegas, NV 89134

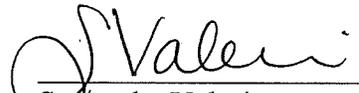

Samantha Valerius
Law Clerk, Department I

EXHIBIT B

1 Matthew D. Francis (6978)
2 Adam P. McMillen (10678)
3 Brownstein Hyatt Farber Schreck, LLP
4 5371 Kietzke Lane
5 Reno, NV 89511
6 Telephone: 775-324-4100
7 Facsimile: 775-333-8171
8 Attorneys for Plaintiff Jed Margolin

9
10 **In The First Judicial District Court of the State of Nevada**
11 **In and for Carson City**

12 **JED MARGOLIN, an individual,**
13 **Plaintiff,**
14 **vs.**

15 **OPTIMA TECHNOLOGY CORPORATION,**
16 **a California corporation, OPTIMA**
17 **TECHNOLOGY CORPORATION, a Nevada**
18 **corporation, REZA ZANDIAN**
19 **aka GOLAMREZA ZANDIANJAZI**
20 **aka GHOLAM REZA ZANDIAN**
21 **aka REZA JAZI aka J. REZA JAZI**
22 **aka G. REZA JAZI aka GHONONREZA**
23 **ZANDIAN JAZI, an individual, DOE**
24 **Companies 1-10, DOE Corporations 11-20,**
25 **and DOE Individuals 21-30,**
26 **Defendants.**

27 **Case No.: 090C005**
28 **Dept. No.: 1**

REC'D & FILED
2016 MAY -3 PM 2:05
SUSAN MERRINE
C. Cooper
CLERK
DEPUTY

**MOTION TO VOID DEEDS,
ASSIGN PROPERTY, FOR WRIT OF
EXECUTION AND TO CONVEY**

29 Plaintiff Jed Margolin ("Plaintiff"), by and through his attorneys of record, hereby files
30 the following Motion to Void Deeds, Assign Property, for Writ of Execution and to Convey:

31 **MEMORANDUM OF POINTS AND AUTHORITIES**

32 **I. Introduction**

33 The Complaint and Amended Complaint in this matter are based upon Defendant Reza
34 Zandian's ("Zandian") fraudulent assignment of patents. Shortly after the Court denied
35 Zandian's motion to set aside the default judgment Zandian filed fraudulent deeds in five
36 Nevada counties whereby he transferred his interest in 22 parcels of real property to insiders in

1 an attempt to avoid execution of the judgment. More recently, Zandian attempted to bribe the
2 undersigned by offering to pay \$30,000 to \$50,000 to the undersigned if the undersigned
3 would resolve this matter without giving any money or consideration to Plaintiff. Zandian has
4 made it clear he will do anything to keep from having to pay the judgment.

5 Plaintiff now moves the Court to void the fraudulent deeds, transfer Zandian's interest
6 in certain Nevada properties to Plaintiff and to order execution on other Nevada property.

7 **II. Procedural Background**

8 As the Court is well aware, Plaintiff filed his original Complaint on December 11,
9 2009. Plaintiff alleged five claims: (1) Conversion, (2) Tortious Interference with Contract,
10 (3) Intentional Interference with Prospective Economic Advantage, (4) Unjust Enrichment,
11 and (5) Unfair and Deceptive Trade Practices. The claims are based upon Zandian's
12 fraudulent assignment of patents. After several motions to dismiss, Zandian filed a General
13 Denial to the Amended Complaint on March 5, 2013. Thereafter, Zandian's counsel withdrew
14 and a Default Judgment was entered against Zandian on June 24, 2013.

15 On December 11, 2013, Plaintiff filed a Motion for Debtor's Examination and to
16 Produce Documents. On December 20, 2013, Zandian filed a Motion to Set Aside the Default
17 Judgment. On January 13, 2014, the Court entered an Order Granting the Motion for Debtor's
18 Examination and to Produce Documents. On February 6, 2014, the Court entered an Order
19 Denying Zandian's Motion to Set Aside the Default Judgment. On March 12, 2014, Zandian
20 filed a Notice of Appeal regarding the Court's Order Denying the Motion to Set Aside the
21 Default Judgment.

22 On June 10, 2015, Plaintiff filed another Motion for Judgment Debtor Examination and
23 to Produce Documents. On October 19, 2015, the Nevada Supreme Court affirmed the Court's
24 orders denying Zandian's motion to set aside the default judgment and awarding fees and
25 costs. On November 6, 2015, the Court entered an Order Granting the Motion for Debtor's
26 Examination and to Produce Documents, whereby Zandian was required to produce
27 documents by December 21, 2015 and to appear for a debtor's examination in February of
28

1 2016. On February 3, 2016, the Court held Zandian in contempt for failing to produce
2 documents as ordered by the Court and issued a warrant for his arrest.

3 On February 24, 2016, pursuant to the Court's November 6, 2015 Order, Plaintiff held
4 the duly noticed debtor's examination of Zandian in San Diego, California. *See* Declaration of
5 Adam McMillen, dated 4/21/16 ("McMillen Declaration"), Exhibit 1. Zandian did not appear
6 for the examination. *See id.* Zandian refused to comply with the Court's orders and has
7 absconded. Plaintiff has been unable to depose Zandian and Zandian has not produced any of
8 the documents ordered by the Court.

9 **III. Pertinent Additional Factual Background**

10 **A. Fraudulent Deeds**

11 On February 6, 2014, the Court entered an Order Denying Zandian's Motion to Set
12 Aside the Default Judgment. Shortly thereafter, Zandian dirtied the title to 22 parcels of real
13 property throughout Nevada, as follows.

14 On March 17, 2014, Zandian recorded a grant deed with Elko County for one parcel,
15 whereby he transferred his interests to Alborz Zandian (his son) and Niloofer Zandian (his
16 wife). *See* McMillen Declaration, Exhibit 2. The deed states the transfer was made pursuant
17 to a "financial agreement entered into in Las Vegas, Nevada and dated 08-21-2003." *Id.* Not
18 only does the timing and parties involved indicate the deed is fraudulent, the parcel in question
19 was purchased after the alleged August 21, 2003 financial agreement on September 25, 2006
20 and the purchase documents do not refer to the alleged "financial agreement." *See* McMillen
21 Declaration, Exhibit 3.

22 On March 18, 2014, Zandian similarly dirtied the titles to three parcels in Churchill
23 County, per the same August 21, 2003 "financial agreement." *See* McMillen Declaration,
24 Exhibits 4-6. All of these parcels were purchased after August 21, 2003 and none of the
25 purchase documents refer to the "financial agreement." *See* McMillen Declaration, Exhibits 7-
26 9.

27 On March 18, 2014, Zandian similarly dirtied the title to one parcel in Washoe County,
28 per the same August 21, 2003 "financial agreement." *See* McMillen Declaration, Exhibit 10.

1 This parcel was also purchased after August 21, 2003 and the purchase documents do not refer
2 to the alleged "financial agreement." *See* McMillen Declaration, Exhibit 11.

3 Zandian dirtied the title to nine other parcels in Washoe County as well. On March 18,
4 2014, a grant deed was recorded by Zandian, which transferred his interest in nine parcels to
5 Fred Sadri, Ray Koroghli and Sathsowi Thay Koroghli and Alborz Zandian and Niloofar
6 Foughani "per financial agreement entered into in Las Vegas, Nevada and dated 08-21-2003."
7 *See* McMillen Declaration, Exhibit 12. As background on these nine parcels, on July 31,
8 2003, Niloo Far Foughani (wife of Zandian) released any community property interest in the
9 nine parcels to Zandian, as his separate property. *See* McMillen Declaration, Exhibit 13. On
10 August 1, 2003, these properties were transferred to Zandian, Fred Sadri and Ray Koroghli,
11 with each receiving a one third interest. *See* McMillen Declaration, Exhibit 14. On June 22,
12 2007, John Peter Lee filed a Judgment Confirming Arbitration Award with the Washoe
13 County Recorder, which judgment transferred the interests of Fred Sadri and Ray Koroghli to
14 Zandian for all nine properties. *See* McMillen Declaration, Exhibit 15. This is why the March
15 18, 2014 deed states Zandian transferred the property from Fred Sadri, Ray Koroghli and
16 Sathsowi Thay Koroghli and himself to Fred Sadri, Ray Koroghli and Sathsowi Thay Koroghli
17 and Alborz Zandian and Niloofar Foughani "per financial agreement entered into in Las
18 Vegas, Nevada and dated 08-21-2003." *See* McMillen Declaration, Exhibit 12.

19 On May 21, 2014, Zandian dirtied the titles to six parcels in Lyon County. *See*
20 McMillen Declaration, Exhibits 16-18. These deeds transferred Zandian's interests to Alborz
21 Zandian and Niloofar Foughani Zandian "per financial agreement entered into in Las Vegas,
22 Nevada and dated August 21, 2003." *Id.* However, again, all six parcels were purchased by
23 Zandian after the purported August 21, 2003 "financial agreement." *See* McMillen
24 Declaration, Exhibits 19-21. None of the purchase documents refer to the alleged "financial
25 agreement." *Id.* Also, the "financial agreement" has never been produced and is not known to
26 exist.

27 On May 30, 2014, Zandian similarly dirtied the titles to two parcels in Clark County,
28 per the same August 21, 2003 "financial agreement." *See* McMillen Declaration, Exhibits 22-

1 23. All of these parcels were purchased after August 21, 2003 and none of the purchase
2 documents refer to the alleged "financial agreement." See McMillen Declaration, Exhibits 24-
3 25.

4 **B. Zandian's Attempted Bribery**

5 From April 12-19, 2016, Zandian emailed the undersigned. See McMillen Declaration,
6 Exhibit 26. Zandian stated that he wanted to pay (bribe) the undersigned because he believes
7 the undersigned has been "unfairly exploited for 8 years based on a judgment obtained by
8 fraudulent service and address." *Id.* In response, the undersigned requested a serious offer to
9 settle this matter. *Id.* Zandian stated he did not want me to talk to "anybody" about the
10 ensuing conversation, including Plaintiff, that Plaintiff had been "manipulated by Robert
11 Adams and Sadri" and that he did not wish to pay Plaintiff "a dime" but "I [Zandian] am
12 prepared to pay you [the undersigned] up to \$30,000 cash or \$50,000 within 18 months" to
13 settle this matter outside of Plaintiff's interests. *Id.*

14 The undersigned told Zandian he represents the interests of Plaintiff and would not
15 accept an offer (bribe) to settle this matter outside of Plaintiff's interests and requested a
16 serious offer to settle this matter. *Id.* The undersigned also requested to know when Zandian
17 would be in the United States in the near future. *Id.* To which, Zandian stated that a debtor's
18 examination would be worthless since there is no money to pay the judgment. *Id.* However,
19 Zandian did say that if Plaintiff paid his travel expenses and had the bench warrant vacated,
20 then he would be more than happy to come to the United States, but he did not promise to
21 appear for an examination or to provide the documents previously ordered by the Court. *Id.*

22 The email communications from Zandian show Zandian is well aware of the Court's
23 orders regarding the debtor's examination and the ensuing bench warrant for disobeying the
24 Court's orders. The email communications show Zandian is willing to continue committing
25 fraud upon Plaintiff and the Court and that he has no regard for Plaintiff, the Court or the rule
26 of law.

27 **IV. Argument**

28 **A. Zandian's Fraudulent Transfers Should Be Declared Void**

1 A "transfer made ... by a debtor is fraudulent as to a creditor ... if the debtor made the
2 transfer ... [w]ith actual intent to hinder, delay or defraud any creditor of the debtor[.]" NRS
3 112.180(1)(a). Actual intent may be determined by considering the following factors as to
4 whether:

- 5 (a) The transfer or obligation was to an insider;
- 6 (b) The debtor retained possession or control of the property transferred
after the transfer;
- 7 (c) The transfer or obligation was disclosed or concealed;
- 8 (d) Before the transfer was made or obligation was incurred, the debtor had
been sued or threatened with suit;
- 9 (e) The transfer was of substantially all the debtor's assets;
- 10 (f) The debtor absconded;
- 11 (g) The debtor removed or concealed assets;
- 12 (h) The value of the consideration received by the debtor was reasonably
equivalent to the value of the asset transferred or the amount of the obligation
incurred;
- 13 (i) The debtor was insolvent or became insolvent shortly after the transfer
was made or the obligation was incurred;
- 14 (j) The transfer occurred shortly before or shortly after a substantial debt
was incurred; and
- 15 (k) The debtor transferred the essential assets of the business to a lienor
who transferred the assets to an insider of the debtor.

16 NRS 112.180(2)(a-k). Many of the NRS 112.180(2) factors apply to Zandian's conduct.
17 Zandian recorded fraudulent deeds in five Nevada counties and transferred 22 parcels to
18 insiders, as defined by NRS 112.150(7), shortly after the Court denied Zandian's motion to set
19 aside the default judgment. Through these insider transfers, Zandian retained control of the
20 properties in question, as partly indicated in his recent emails where he states that the "vacant
21 land in Nevada that I got as sweat equity has no value and I am planning on paying you out of
22 other resources." *See* McMillen Declaration, Exhibit 26.

23 While the fraudulent deeds were recorded with the county recorders' offices, the 2003
24 "financial agreement" was not disclosed and remains concealed by Zandian. Also, Zandian
25 has absconded and he refuses to comply with this Court's orders and refuses to produce
26 documents or to appear for a debtor's examination and says he is now living in Iran, as
27 opposed to France. *See* McMillen Declaration, Exhibit 26.
28

1 As a result of the fraudulent transfers, Plaintiff may obtain avoidance of such transfers
 2 “to the extent necessary to satisfy the creditor’s claim.” NRS 112.210(1). “Subject to
 3 applicable principles of equity and in accordance with applicable rules of civil procedure” this
 4 Court may also provide “[a]ny other relief the circumstances may require.” NRS
 5 112.210(1)(c). Accordingly, Plaintiff requests the Court issue an order voiding the transfers
 6 detailed in Section III(A), above.

7 **B. Application Of Property Toward Satisfaction Of Judgment**

8 “All goods, chattels, money and other property, real and personal, of the judgment
 9 debtor, or any interest therein of the judgment debtor not exempt by law, and all property and
 10 rights of property seized and held under attachment in the action, are liable to execution.”
 11 NRS 21.080(1). “The judge or master may order any property of the judgment debtor not
 12 exempt from execution, in the hands of such debtor or any other person, or due to the
 13 judgment debtor, to be applied toward the satisfaction of the judgment.” NRS 21.320; *see also*
 14 NRS 112.210(2) (“If a creditor has obtained a judgment on a claim against the debtor, the
 15 creditor, if the court so orders, may levy execution on the asset transferred or its proceeds.”)
 16 (emphasis added).¹

17 Plaintiff requests the Court order the following property of Zandian, which is not
 18 exempt from execution,² to be applied toward satisfaction of the judgment by ordering the
 19 transfer of Zandian’s interest in the following properties to Plaintiff:

Parcel	acres	Assessed Value (Washoe County Assessor 2016)	Assignment Value
079-150-09	560.0	\$2,822	\$3,200
079-150-13	560.0	\$2,822	\$3,200
084-040-04	640.08	\$3,226	\$3,700

24
 25 ¹ In Nevada, a supplementary proceeding is “incident to the original suit” and “is not an independent proceeding
 26 or the commencement of a new action.” Nevada Direct Ins. Co. v. Fields, No. 66561, 2016 WL 797048, at *3
 27 (Nev. Feb. 26, 2016) (citing State ex rel. Groves v. First Judicial Dist. Court, 61 Nev. 269, 276, 125 P.2d 723,
 28 726 (1942); 30 Am.Jur.2d Executions and Enforcements of Judgments § 584 (2005) (“In jurisdictions where a
 proceeding supplemental is not an independent action, but is merely a proceeding to enforce an earlier
 judgment, proceedings supplemental are conducted in the same court that entered the judgment against the
 defendant, usually under the same cause number. In fact, proceedings supplemental may be filed only in the
 trial court issuing the underlying judgment.” (footnotes omitted))).

² See NRS 21.090; *see also* McMillen Declaration, Exhibit 26.

084-040-06	633.03	\$6,197	\$7,000
084-040-10	390.0	\$1,966	\$2,300
084-140-17	160.0	\$806	\$1,000
Totals	2,943.11	\$17,839	\$20,400

Parcel	acres	Assessed Value (Lyon County Assessor 2016)	Assignment Value
006-052-04	.220	\$15,560	\$5,187
006-052-05	.220	\$15,560	\$5,187
006-052-06	.220	\$15,560	\$5,187
Totals	.66	\$46,680	\$15,561

Parcel	acres	Assessed Value (Churchill County Assessor 2016)	Assignment Value
009-331-04	50.0	\$2,625	\$1,500
Totals	50.0	\$2,625	\$1,500

C. Writ of Execution

On June 24, 2013, the Court entered a Default Judgment against Defendants. On June 27, 2013, a Notice of Entry of the Default Judgment was filed. In the Default Judgment, the Court entered judgment in favor of Plaintiff against Zandian in the sum of \$1,495,775.74, plus interest at the legal rate, pursuant to NRS 17.130, therein from the date of default until the judgment is satisfied.

Plaintiff requests the Court authorize all applicable County Sheriffs or other authorized officers in the State of Nevada to execute the Judgment through the seizure of Zandian's bank accounts, investment accounts, certificates of deposit, annuities, wages, and real and personal property.

Based on the foregoing and the attached Memorandum of Post-Judgment Costs and Fees, attached hereto as Exhibit 2, Plaintiff also hereby requests that the Court direct the Court Clerk to issue the attached proposed Writs of Execution, attached hereto as Exhibit 3, so that the appropriate authorities may assist Plaintiff in executing the Default Judgment against Zandian. If the properties are not enough to satisfy the Judgment, Plaintiff requests the Court order and direct that any further appropriate writs of execution that are provided to the Court Clerk by Plaintiff also be issued, until the Judgment is satisfied.

1 In addition, Plaintiff seeks the following orders with regards to the following parcels in
 2 order to protect and satisfy Plaintiff's claim. *See* NRS 112.210(1)(c)(1) and (3) ("In an action
 3 for relief against a transfer or obligation under this chapter, a creditor ... may obtain: ... (1)
 4 An injunction against further disposition by the debtor or a transferee, or both, of the asset
 5 transferred or of other property; ... or (3) Any other relief the circumstances may require.").

6 Zandian has an interest in two parcels in Lyon County, parcel numbers 015-311-18 and
 7 015-311-19. In order to protect Plaintiff's interest and to satisfy his claim, Plaintiff requests
 8 the Court order a minimum bid of \$25,000 for each parcel and in the event the minimum bid is
 9 not reached for either parcel, that Zandian be ordered not to sell, assign, or divide his interest
 10 in either parcel or to allow either or both to be foreclosed upon until the Judgment is paid.

11 Zandian has an interest in parcel 007-151-77 in Churchill County. Plaintiff requests
 12 the Court order a minimum bid of \$10,000 for this parcel and in the event the minimum bid is
 13 not reached, that Zandian is ordered not to sell, assign, or divide his interest in the parcel or to
 14 allow it to be foreclosed upon until the Judgment is paid.

15 Zandian has an interest in parcel 001-660-034 in Elko County. Plaintiff requests the
 16 Court order a minimum bid of \$25,000 for this parcel and in the event the minimum bid is not
 17 reached, that Zandian is ordered not to sell, assign, or divide his interest in the parcel or to
 18 allow it to be foreclosed upon until the Judgment is paid.

19 **D. Conveyance Of Property Sold At Auction**

20 On December 9, 2014, the Clark County Sheriff sold at public auction Zandian's
 21 interest in two Clark County parcels. *See* McMillen Declaration, Exhibits 27-28. As there
 22 were no other bidders, Plaintiff credit bid at the auction and purchased both parcels. *Id.* The
 23 following is a summary of the auction information for the two parcels:

Clark County	Acres	Bought at auction 12/9/2014	Assessed Value (Clark County Assessor 2016)
APN 071-02-000-013	20.0	\$16,000	\$7,000
APN 071-02-000-005	10.0	\$8,000	\$3,500
Total	30.0	\$24,000	\$10,500

1 On April 3, 2015, the Washoe County Sheriff sold at public auction Zandian's interest
 2 in four Washoe County parcels. See McMillen Declaration, Exhibits 29-32. As there were no
 3 other bidders, Plaintiff credit bid at the auction and purchased all four parcels. *Id.* The
 4 following is a summary of the auction information for the four parcels:

Washoe County	Acres	Bought at auction 4/3/2015	Assessed Value (Washoe County Assessor 2016)
APN 079-150-12	160	\$15,000	\$16,800
APN 079-150-10	639.58	\$5,000	\$3,224
APN 084-040-02	627.24	\$5,000	\$3,161
APN 084-130-07	275.83	\$3,000	\$1,390
Total	1702.65	\$28,000	\$24,575

5
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 9
 10 "Upon a sale of real property, the purchaser shall be substituted to and acquire all the
 11 right, title, interest and claim of the judgment debtor thereto." NRS 21.190. Such sales are
 12 subject to redemption. *Id.* A judgment debtor or his successor in interest may redeem the
 13 property any time within 1 year after the sale. See NRS 21.200 and NRS 21.210. "If no
 14 redemption is made within 1 year after the sale, the purchaser, or the purchaser's assignee, is
 15 entitled to a conveyance..." NRS 21.220(4).

16 It has been more than 1 year since the above Clark County and Washoe County
 17 properties were sold at auction to Plaintiff. The properties have not been redeemed by anyone.
 18 Accordingly, Plaintiff requests that the Court order the six properties conveyed to Plaintiff.

19 **V. Conclusion**

20 Based upon the foregoing, Plaintiff respectfully requests this motion be granted in its
 21 entirety.

22 **The undersigned does hereby affirm that the preceding document does not**
 23 **contain the social security number of any person.**

24 Dated this 3rd day of May, 2016.

25 BY: 

26 Matthew D. Francis (6978)
 27 Adam P. McMillen (10678)
 28 5371 Kietzke Lane
 Reno, NV 89511
 Telephone: 775-324-4100
 Facsimile: 775-333-8171
 Attorneys for Plaintiff Jed Margolin

CERTIFICATE OF SERVICE

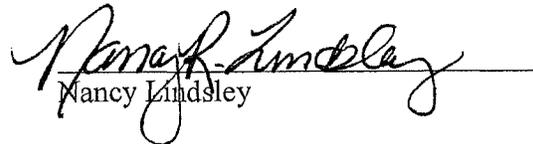
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Pursuant to NRCP 5(b), I certify that I am an employee of Brownstein Hyatt Farber Schreck, and that on this date, I deposited for mailing, in a sealed envelope, with first-class postage prepaid, a true and correct copy of the foregoing document, **MOTION TO VOID DEEDS, ASSIGN PROPERTY AND FOR WRIT OF EXECUTION**, addressed as follows:

Reza Zandian
c/o Alborz Zandian
9 MacArthur Place, Unit 2105
Santa Ana, CA 92707-6753
and
rezazand@hotmail.com

Severin A. Carlson
Tara C. Zimmerman
Kaempfer Crowell
50 West Liberty Street, Suite 700
Reno, Nevada 89501
Former counsel of Reza Zandian

Dated: May 3, 2016


Nancy Lindsley

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EXHIBIT LIST

EXHIBIT NO.	DESCRIPTION	PAGE(S)
1	Declaration of Adam McMillen	275
2	Consolidated Memorandum of Post-Judgment Fees and Costs	6
3	<i>Proposed</i> Writs of Execution (Lyon, Elko and Churchill Counties)	4

Exhibit 1

Exhibit 1

1 Matthew D. Francis (6978)
Adam P. McMillen (10678)
2 Brownstein Hyatt Farber Schreck, LLP
5371 Kietzke Lane
3 Reno, NV 89511
Telephone: 775-324-4100
4 Facsimile: 775-333-8171
Attorneys for Plaintiff Jed Margolin
5
6

7 In The First Judicial District Court of the State of Nevada
8 In and for Carson City
9

10
11 JED MARGOLIN, an individual,
12 Plaintiff,

Case No.: 090C00579 1B
Dept. No.: 1

13 vs.

14 OPTIMA TECHNOLOGY CORPORATION,
a California corporation, OPTIMA
15 TECHNOLOGY CORPORATION, a Nevada
corporation, REZA ZANDIAN
16 aka GOLAMREZA ZANDIANJAZI
17 aka GHOLAM REZA ZANDIAN
aka REZA JAZI aka J. REZA JAZI
18 aka G. REZA JAZI aka GHONONREZA
ZANDIAN JAZI, an individual, DOE Companies
19 1-10, DOE Corporations 11-20, and DOE
20 Individuals 21-30,

**DECLARATION OF ADAM
MCMILLEN IN SUPPORT OF
MOTION TO VOID DEEDS, ASSIGN
PROPERTY, FOR WRIT OF
EXECUTION AND TO CONVEY**

21 Defendants.
22

I, Adam P. McMillen, do hereby declare and state:

23
24 1. I am counsel of record for Plaintiff Jed Margolin in this matter. This declaration is
25 based upon my personal knowledge and is made in support of the Motion to Void Deeds,
26 Assign Property and for Writ of Execution, filed concurrently herewith.

27 2. Attached hereto as Exhibit 1 is a true and correct copy of the transcript of Defendant
28 Reza Zandian's debtor's examination on April 21, 2016 showing his non-appearance

1 3. Attached hereto as Exhibit 2 is a true and correct copy of Elko County Doc# 684351
2 - Grant Deed recorded 03/17/2014, APN: 001-660-034.

3 4. Attached hereto as Exhibit 3 is a true and correct copy of Elko County Doc# 560545
4 - Grant, Bargain and Sale Deed recorded 09/26/2006, APN: 001-660-034.

5 5. Attached hereto as Exhibit 4 is a true and correct copy of Churchill County Doc#
6 439670 - Grant Deed recorded 03/18/2014, APN: 007-151-12.

7 6. Attached hereto as Exhibit 5 is a true and correct copy of Churchill County Doc#
8 439671 - Grant Deed recorded 03/18/2014, APN: 007-151-77.

9 7. Attached hereto as Exhibit 6 is a true and correct copy of Churchill County Doc#
10 439672 - Grant Deed recorded 03/18/2014, APN: 009-33-104.

11 8. Attached hereto as Exhibit 7 is a true and correct copy of Churchill County Doc#
12 383845 - Grant, Bargain and Deed recorded 07/10/2006, APN: 007-151-12.

13 9. Attached hereto as Exhibit 8 is a true and correct copy of Churchill County Doc#
14 384273 - Grant, Bargain and Sale Deed recorded 07/27/2006, APN: 007-151-77.

15 10. Attached hereto as Exhibit 9 is a true and correct copy of Churchill County Doc#
16 372686 - Grant, Bargain and Sale Deed recorded 07/06/2005, APN: 009-33-104.

17 11. Attached hereto as Exhibit 10 is a true and correct copy of Washoe County Doc#
18 4335754 - Grant Deed recorded 03/18/2014, APN: 079-150-12.

19 12. Attached hereto as Exhibit 11 is a true and correct copy of Washoe County Doc#
20 3236343 - Grant, Bargain and Sale Deed recorded 06/27/2005, APN: 079-150-12.

21 13. Attached hereto as Exhibit 12 is a true and correct copy of Washoe County Doc#
22 4335755 - Grant Deed recorded 03/18/2014, APNs: 079-150-09, 070-150-10, 079-150-13,
23 084-040-02, 084-040-04, 084-040-06, 084-040-10, 084-130-07, 084-140-17.
24
25
26
27

1 Jeffrey L. Hartman, Esq., #1607
2 **HARTMAN & HARTMAN**
3 510 West Plumb Lane, Suite B
4 Reno, Nevada 89509
5 Telephone: (775) 324-2800
6 Facsimile: (775) 324-1818
7 E-mail: notices@bankruptcyreno.com

E-Filed 5/26/16

5 Attorney for Patrick Canet,
6 Judicial Liquidator

7 **UNITED STATES BANKRUPTCY COURT**
8 **DISTRICT OF NEVADA**

9 IN RE:
10 Gholam Reza Jazi Zandian
11 Debtor in a Foreign Proceeding.

CASE NO. BK-N-16-50644-BTB
CHAPTER 15

**NOTICE OF HEARING ON VERIFIED
PETITION FOR RECOGNITION AND
CHAPTER 15 RELIEF**

Hearing Date: June 23, 2016
Hearing Time: 10:00 a.m.

14 _____/

15 **NOTICE IS HEREBY GIVEN** that Patrick Canet ("Mr. Canet"), in his capacity as
16 Foreign Representative in proceedings affecting Gholam Reza Jazi Zandian, has filed a
17 Petition For Recognition and Chapter 15 Relief ("Petition") in accordance with 11 U.S.C. §§
18 1504 and 1515. The Petition requests the Court enter an order recognizing Mr. Canet as the
19 Foreign Representative and recognizing the pendency of the Foreign Main Proceeding in
20 Paris, France and

21 **NOTICE IS FURTHER GIVEN** that a hearing on the Petition has been scheduled
22 before a United States Bankruptcy Judge, in the Clifton Young Federal Building, 300 Booth
23 Street, Reno, Nevada on **June 23, 2016 at 10:00 a.m.**

24 **NOTICE IS FURTHER GIVEN** that any response to the Petition must be filed
25 pursuant to the time limits set forth in F.R.Bankr.P. 1011(b):

26 Defenses and objections to the petition shall be presented in the manner
27 prescribed by Rule 12 F.R. Civ. P. and shall be filed and served within 21
28 days after service of this Notice

1 If you do object, you must file a **WRITTEN** response to this Petition with the Court. You
2 *must* also serve your written response on the person who sent you this notice. A paper copy
3 of any response should also be delivered to the Clerk's office identified as "Copy For
4 Chambers" or some similar designation. If you do not file a written response with the Court,
5 or if you do not serve your written response on the person who sent you this notice, then:

- 6 • The Court may *refuse to allow you to speak* at the scheduled hearing; and
- 7 • The Court may grant the relief requested in the Petition without formally
8 calling the matter at the hearing.

9 **NOTICE IS FINALLY GIVEN** that a copy of the Petition can be obtained upon
10 written request from Hartman & Hartman, 510 West Plumb Lane, Suite B, Reno, Nevada
11 89509, by calling Hartman & Hartman at 1-775-324-2800, or from the United States
12 Bankruptcy Court Clerk's Office, 300 Booth Street, Reno, Nevada 89509, during the office
13 hours of 9:00 a.m. to 3:30 p.m. weekdays.

14 DATED: May 26, 2016.

15 **HARTMAN & HARTMAN**

16 /s/ Jeffrey L. Hartman
17 Jeffrey L. Hartman, Esq.
18 Attorney for Patrick Canet,
19 Foreign Representative
20
21
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23
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28

Situs & Keyline Description:
 0 INTERSTATE 80 E WASHOE COUNTY
 NE4 SEC 15 TWP 20 RGE 23

Owner & Mailing Address:
 STAR LIVING TRUST
 SADRI TRUSTEE, FRED
 PO BOX 81624
 LAS VEGAS, NV 89180

WASHOE COUNTY APPRAISAL RECORD 2018

APN: 084-140-17

Card 1 of 1
 Bld. 0-0



Tax District: 4000

printed: 12/26/2017

ACTIVE

6802.23

LAWW - AG

VALUATION HISTORY							PARCEL VALUE SUMMARY		Database	Roll Year	Prior % Complete	% Complete
Roll Year	Taxable Land	Land New	Taxable Improvements	Improvement New	Total Taxable	Total Assessed	Primary Valuation	Building Level Cost	PROD			
2018 NR	2,368	0	0	0	2,368	829	Building Value					
2017 FV	2,501	0	0	0	2,501	875	Extra Feature Value					
2016 FV	2,358	0	0	0	2,358	825	Land Value	2,368				
2015 FV	2,304	0	0	0	2,304	806	Taxable Value	2,368				
2014 FV	2,058	0	0	0	2,058	720	Exemption	0				
2013 FV	2,528	0	0	0	2,528	885	FLAGS					
2012 FV	2,464	0	0	0	2,464	862	Type	Value				
2011 FV	2,405	0	0	0	2,405	842	Cap Code	NFM				
2010 FV	1,984	0	0	0	1,984	694	Eligible for Form?	NO				
2009 FV	1,906	0	0	0	1,906	667	Low Cap Percentage	0				
2008 FV	1,499	0	0	0	1,499	525	Parcel Map	0				
2007 FV	1,371	0	0	0	1,371	480						

BUILDING DETAILS				BUILDING FEATURES AND ADJUSTMENTS				BUILDING SUB-AREAS				BUILDING COST SUMMARY				
Code		Description		Category		Units		Code		Description		Yr Bld	Units	Cost New	Tot Lump Sum Adj	% Complete
Type																0
Occupancy																0
Story/Frame																100
Quality																.00
Year Built	WAY	%Comp	Year of Addn/Remodel													0
0		0														0
BUILDING CHARACTERISTICS																0
Category	Code	Type	%													0
																0
				Base Rate Adjustment		Adj.										89502
				Construction Modifiers		Adj.										0
								Gross Living/Building Area				0				
								Perimeter				0				

#	Bld	Date	User ID	Activity Notes
1	0-0	10/22/2013	csarman	RXT LAWV IMPROVEMENT LINE DONE 10/22/2013 BY REVIEWED-NO CHGS ON IMP REPORT, LAND LINE DONE 10/23/2013 BY JAK

EXTRA FEATURES, ADDITIVES, AND ADJUSTMENTS																
#	Code	Description	Quality	Bld #	Length	Width	Units	Unit Price	Year Built	Roll Year	% Comp	RCN	% Good	DRC	Override Value	Notes

LAND VALUE		DOR Code	600	Neighborhood	6802.23	LAWW - AG	Land Size		160.0000	Unit Type	AC		
#	Code	Description	Zone	Units	Unit Type	Sub Type	Unit Price	Influence 1 Code	Influence 1 %	Influence 2 Code	Influence 2 %	Taxable Value	Land Notes
1	GRZ2	Grazing2	GR	160.00	AA	0	14.80					2,368	

This information is for use by the Washoe County Assessor for assessment purposes only.

WFZ2536



Tax District: 4000

printed: 12/26/2017

ACTIVE

6802.23

LAWW - AG



BUILDING PERMITS							
Date	Permit #	Description	Amount	Status	% Comp	Last Visit/Appr/Results	Notes

SALES/TRANSFER INFORMATION							
Grantor	Document	Date	LUC	Verif	Terms	Sales	Notes
STAR LIVING TRUST	4747575	09/25/2017	600	3NTT			
STAR LIVING TRUST	4335755	03/18/2014		3BEA			
SADRI, FRED	3758659	05/12/2009	GRZ2	3BGG			33% INTO TRUST
SADRI, FRED	2900593	08/06/2003	GRZ2	3NTT			FILE # - SPOUSE NO
NEVADA LAND &	2900592	08/06/2003	GRZ2	2MQC	4DEC	1,000,000	A INCLUDES 9 PARCELS
	2117820	07/17/1997					

#	Bld	Date	User ID	Activity Notes
2	0-0	10/12/2012	csarm	REXT LAND AND IMPROVEMENT LINES COMPLETE - LAWW IMPROVEMENT LINE DONE
3	0-0	10/26/2011	kjohn	REXT LAWW IMPROVEMENT LINE DONE 10/26/2011 BY REVIEWED-NO CHGS ON IMP
4	0-0	07/07/2010	kjohn	REXT LAWW IMPROVEMENT LINE DONE 07/07/2010 BY REVIEWED-NO CHGS ON IMP
5	0-0	10/31/2009	kjohn	REXT LAWW IMPROVEMENT LINE DONE 10/31/2009 BY REVIEWED-NO CHANGES ON
6	0-0	10/14/2008	PJO	REXT LAWW IMPROVEMENT LINE DONE 01/00/1900 BY NO CHANGES ON IMP REPORT,
7	0-0	10/10/2006	mbozm	REXT
8	0-0	08/28/2001	RLS	REXT
9	0-0	06/20/2001	CEM	REXT
10	0-0	08/03/2012	csarm	AERL - PICTOMETRY REVIEW

Situs & Keyline Description:
 0 INTERSTATE 80 E WASHOE COUNTY
 FR SEC 15 TWP 20 RGE 23

Owner & Mailing Address:
 STAR LIVING TRUST
 SADRI TRUSTEE, FRED
 PO BOX 81624
 LAS VEGAS, NV 89180

WASHOE COUNTY APPRAISAL RECORD 2018

APN: 084-130-07

Card 1 of 1
 Bld. 0-0



Tax District: 4000

printed: 12/26/2017

ACTIVE

6802.23

LAWW - AG

VALUATION HISTORY							PARCEL VALUE SUMMARY		Database	Roll Year	Prior % Complete	% Complete
Roll Year	Taxable Land	Land New	Taxable Improvements	Improvement New	Total Taxable	Total Assessed	Primary Valuation	Building Level Cost	PROD			
2018 NR	4,082	0	0	0	4,082	1,429	Building Value					
2017 FV	4,311	0	0	0	4,311	1,509	Extra Feature Value					
2016 FV	4,066	0	0	0	4,066	1,423	Land Value	4,082				
2015 FV	3,972	0	0	0	3,972	1,390	Taxable Value	4,082				
2014 FV	3,547	0	0	0	3,547	1,241	Exemption	0				
2013 FV	4,358	0	0	0	4,358	1,525	FLAGS					
2012 FV	4,248	0	0	0	4,248	1,487	Type	Value				
2011 FV	4,146	0	0	0	4,146	1,451	Cap Code	NFM				
2010 FV	3,420	0	0	0	3,420	1,197	Eligible for Form?	NO				
2009 FV	3,285	0	0	0	3,285	1,150	Low Cap Percentage	0				
2008 FV	2,585	0	0	0	2,585	905	Parcel Map	0				
2007 FV	2,364	0	0	0	2,364	827						

BUILDING DETAILS				BUILDING FEATURES AND ADJUSTMENTS				BUILDING SUB-AREAS				BUILDING COST SUMMARY	
Code	Description			Category	Units	Code	Description	Yr Bld	Units	Cost New	Tot Lump Sum Adj		
Type											Sub Area-RCN	0	
Occupancy											% Incomplete	100	
Story/Frame											% Depreciation	.00	
Quality											\$ Dep & Inc	0	
Year Built	WAY	%Comp	Year of Addn/Remodel								Obso/Other Adj.	0	
	0	0									Sub Area DRC	0	
BUILDING CHARACTERISTICS											Additive DRC	0	
Category	Code	Type	%								Total DRC		
											Override	0	
											Cost Code	89502	
PROPERTY CHARACTERISTICS													
										Special Prop Code	Ag Land - Current -		
										Water	None		
										Sewer	None		
										Street	None		
BUILDING NOTES													
										Gross Living/Building Area	0		
										Perimeter	0		

#	Bld	Date	User ID	Activity Notes
1	0-0	10/22/2013	csarman	REXT LAWV IMPROVEMENT LINE DONE 10/22/2013 BY REVIEWED-NO CHGS ON IMP REPORT, LAND LINE DONE 10/23/2013 BY JAK

EXTRA FEATURES, ADDITIVES, AND ADJUSTMENTS																
#	Code	Description	Quality	Bld #	Length	Width	Units	Unit Price	Year Built	Roll Year	% Comp	RCN	% Good	DRC	Override Value	Notes

LAND VALUE		DOR Code	600	Neighborhood	6802.23	LAWW - AG	Land Size	275.8300	Unit Type	AC			
#	Code	Description	Zone	Units	Unit Type	Sub Type	Unit Price	Influence 1 Code	Influence 1 %	Influence 2 Code	Influence 2 %	Taxable Value	Land Notes
1	GRZ2	Grazing2	GR	275.83	AA	0	14.80					4,082	

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WFZ2538



Tax District: 4000

printed: 12/26/2017

ACTIVE

6802.23

LAWW - AG



BUILDING PERMITS							
Date	Permit #	Description	Amount	Status	% Comp	Last Visit/Appr/Results	Notes

SALES/TRANSFER INFORMATION							
Grantor	Document	Date	LUC	Verif	Terms	Sales	Notes
STAR LIVING TRUST	4747575	09/25/2017	600	3NTT			ORDER FROM JULY 17 2008
STAR LIVING TRUST	4630134	09/08/2016	600	3BF		3,000	
STAR LIVING TRUST	4335755	03/18/2014		3BEA			
SADRI, FRED	3758659	05/12/2009	GRZ2	3BGG			33% INTO TRUST
SADRI, FRED	2900593	08/06/2003	GRZ2	3NTT			FILE # - SPOUSE NO
NEVADA LAND &	2900592	08/06/2003	GRZ2	2MQC	4DEC	1,000,000	A INCLUDES 9 PARCELS

#	Bld	Date	User ID	Activity Notes
2	0-0	10/12/2012	csarm	REXT LAND AND IMPROVEMENT LINES COMPLETE - LAWW IMPROVEMENT LINE DONE
3	0-0	10/26/2011	kjohn	REXT LAWW IMPROVEMENT LINE DONE 10/26/2011 BY REVIEWED-NO CHGS ON IMP
4	0-0	07/07/2010	kjohn	REXT LAWW IMPROVEMENT LINE DONE 07/07/2010 BY REVIEWED-NO CHGS ON IMP
5	0-0	10/31/2009	kjohn	REXT LAWW IMPROVEMENT LINE DONE 10/31/2009 BY REVIEWED-NO CHANGES ON
6	0-0	10/14/2008	PJO	REXT LAWW IMPROVEMENT LINE DONE 01/00/1900 BY NO CHANGES ON IMP REPORT,
7	0-0	10/10/2006	mbozm	REXT
8	0-0	08/28/2001	RLS	REXT
9	0-0	08/03/2012	csarm	AERL - PICTOMETRY REVIEW
10	0-0	10/18/2016	rlope	REXT BY CSS - 10/14/2016

Situs & Keyline Description:
 0 INTERSTATE 80 E WASHOE COUNTY
 FR SEC 11 TWP 20 RGE 23

Owner & Mailing Address:
 STAR LIVING TRUST
 SADRI TRUSTEE, FRED
 PO BOX 81624
 LAS VEGAS, NV 89180

WASHOE COUNTY APPRAISAL RECORD 2018

APN: 084-040-10

Card 1 of 1
 Bld. 0-0



Tax District: 4000

printed: 12/26/2017

ACTIVE

6802.23

LAWW - AG

VALUATION HISTORY							PARCEL VALUE SUMMARY		Database	Roll Year	Prior % Complete	% Complete
Roll Year	Taxable Land	Land New	Taxable Improvements	Improvement New	Total Taxable	Total Assessed	Primary Valuation	Building Level Cost	PROD			
						Building Value						
2018 NR	5,772	0	0	0	5,772	2,020	Extra Feature Value					
2017 FV	6,096	0	0	0	6,096	2,134	Land Value	5,772				
2016 FV	5,749	0	0	0	5,749	2,012	Taxable Value	5,772				
2015 FV	5,616	0	0	0	5,616	1,966	Exemption	0			Reopen	Code:
2014 FV	5,015	0	0	0	5,015	1,755	FLAGS				Reappraisal	
2013 FV	6,162	0	0	0	6,162	2,157	Type	Value				
2012 FV	6,006	0	0	0	6,006	2,102	Cap Code	NFM			NC / C	New Land
2011 FV	5,862	0	0	0	5,862	2,052	Eligible for Form?	NO				New Sketch
2010 FV	4,836	0	0	0	4,836	1,693	Low Cap Percentage	0			By:	Date:
2009 FV	4,645	0	0	0	4,645	1,626	Parcel Map	0				
2008 FV	3,654	0	0	0	3,654	1,279						
2007 FV	3,342	0	0	0	3,342	1,170						

BUILDING DETAILS				BUILDING FEATURES AND ADJUSTMENTS				BUILDING SUB-AREAS				BUILDING COST SUMMARY	
Code	Description			Category	Units	Code	Description	Yr Bld	Units	Cost New	Tot Lump Sum Adj		
Type											0		
Occupancy											0		
Story/Frame											100		
Quality											.00		
Year Built	WAY	%Comp	Year of Addn/Remodel								\$ Dep & Inc	0	
	0	0									Obso/Other Adj.	0	
BUILDING CHARACTERISTICS											Sub Area DRC	0	
Category	Code	Type	%								Additive DRC	0	
											Total DRC		
											Override	0	
											Cost Code	89502	
PROPERTY CHARACTERISTICS													
				Base Rate Adjustment	Adj.					Special Prop Code	Ag Land - Current -		
										Water	None		
										Sewer	None		
										Street	None		
BUILDING NOTES													
								Gross Living/Building Area	0				
								Perimeter	0				
#	Bld	Date	User ID	Activity Notes									
1	0-0	10/22/2013	csarman	REXT LAWW IMPROVEMENT LINE DONE 10/22/2013 BY REVIEWED-NO CHGS ON IMP REPORT, LAND LINE DONE 10/23/2013 BY JAK									

EXTRA FEATURES, ADDITIVES, AND ADJUSTMENTS																
#	Code	Description	Quality	Bld #	Length	Width	Units	Unit Price	Year Built	Roll Year	% Comp	RCN	% Good	DRC	Override Value	Notes

LAND VALUE	DOR Code	600	Neighborhood	6802.23	LAWW - AG	Land Size	390.0000	Unit Type	AC				
#	Code	Description	Zone	Units	Unit Type	Sub Type	Unit Price	Influence 1 Code	Influence 1 %	Influence 2 Code	Influence 2 %	Taxable Value	Land Notes
1	GRZ2	Grazing2	GR	390.00	AA	0	14.80					5,772	

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WFZ2540



Tax District: 4000

printed: 12/26/2017

ACTIVE

6802.23

LAWW - AG



BUILDING PERMITS							
Date	Permit #	Description	Amount	Status	% Comp	Last Visit/Appr/Results	Notes

SALES/TRANSFER INFORMATION							
Grantor	Document	Date	LUC	Verif	Terms	Sales	Notes
STAR LIVING TRUST	4747575	09/25/2017	600	3NTT			
STAR LIVING TRUST	4335755	03/18/2014		3BEA			
SADRI, FRED	3758659	05/12/2009	GRZ1	3BGG			33% INTO TRUST
SADRI, FRED	2900593	08/06/2003	GRZ2	3NTT			FILE # - SPOUSE NO
NEVADA LAND &	2900592	08/06/2003	GRZ2	2MQC	4DEC	1,000,000	A INCLUDES 9 PARCELS
	2117820	07/17/1997					

#	Bld	Date	User ID	Activity Notes
2	0-0	10/12/2012	csarm	REXT LAND AND IMPROVEMENT LINES COMPLETE - LAWW IMPROVEMENT LINE DONE
3	0-0	10/26/2011	kjohn	REXT LAWW IMPROVEMENT LINE DONE 10/26/2011 BY REVIEWED-NO CHGS ON IMP
4	0-0	07/07/2010	kjohn	REXT LAWW IMPROVEMENT LINE DONE 07/07/2010 BY REVIEWED-NO CHGS ON IMP
5	0-0	10/31/2009	kjohn	REXT LAWW IMPROVEMENT LINE DONE 10/31/2009 BY REVIEWED-NO CHANGES ON
6	0-0	10/14/2008	PJO	REXT LAWW IMPROVEMENT LINE DONE 01/00/1900 BY NO CHANGES ON IMP REPORT,
7	0-0	09/15/2006	mbozm	REXT
8	0-0	08/28/2001	RLS	REXT
9	0-0	08/03/2012	csarm	AERL - PICTOMETRY REVIEW
10	0-0	10/18/2016	rlope	REXT BY CSS - 10/14/2016

Situs & Keyline Description:
 0 INTERSTATE 80 E WASHOE COUNTY
 SEC 1 TWP 20 RGE 23

Owner & Mailing Address:
 STAR LIVING TRUST
 SADRI TRUSTEE, FRED
 PO BOX 81624
 LAS VEGAS, NV 89180

WASHOE COUNTY APPRAISAL RECORD
2018

APN: 084-040-06

Card 1 of 1
 Bld. 0-0



Tax District: 4000

printed: 12/26/2017

ACTIVE

6802.23

LAWW - AG

VALUATION HISTORY							PARCEL VALUE SUMMARY		Database	Roll Year	Prior % Complete	% Complete
Roll Year	Taxable Land	Land New	Taxable Improvements	Improvement New	Total Taxable	Total Assessed	Primary Valuation	Building Level Cost	PROD			
2018 NR	18,162	0	0	0	18,162	6,357	Building Value					
2017 FV	19,155	0	0	0	19,155	6,704	Extra Feature Value					
2016 FV	18,231	0	0	0	18,231	6,381	Land Value	18,162				
2015 FV	17,706	0	0	0	17,706	6,197	Taxable Value	18,162				
2014 FV	16,263	0	0	0	16,263	5,692	Exemption	0			Reopen	Code:
2013 FV	19,333	0	0	0	19,333	6,767	FLAGS				Reappraisal	
2012 FV	18,902	0	0	0	18,902	6,616	Type	Value				
2011 FV	18,339	0	0	0	18,339	6,419	Cap Code	NFM				
2010 FV	15,136	0	0	0	15,136	5,298	Eligible for Form?	NO		NC / C	New Land	New Sketch
2009 FV	14,629	0	0	0	14,629	5,120	Low Cap Percentage	0				
2008 FV	11,433	0	0	0	11,433	4,002	Parcel Map	0				
2007 FV	10,489	0	0	0	10,489	3,671				By:		Date:

BUILDING DETAILS				BUILDING FEATURES AND ADJUSTMENTS				BUILDING SUB-AREAS				BUILDING COST SUMMARY	
Code	Description	Category	Units	Code	Description	Yr Bld	Units	Cost New	Tot Lump Sum Adj				
Type									0				
Occupancy									0				
Story/Frame									100				
Quality									.00				
Year Built	WAY	%Comp	Year of Addn/Remodel						0				
	0	0							0				
BUILDING CHARACTERISTICS									0				
Category	Code	Type	%						0				
									89502				
Base Rate Adjustment				Adj.									
Construction Modifiers				Adj.									
Gross Living/Building Area							0						
Perimeter							0						

#	Bld	Date	User ID	Activity Notes
1	0-0	10/22/2013	csarman	REXT LAWV IMPROVEMENT LINE DONE 10/22/2013 BY REVIEWED-NO CHGS ON IMP REPORT, LAND LINE DONE 10/23/2013 BY JAK

EXTRA FEATURES, ADDITIVES, AND ADJUSTMENTS																
#	Code	Description	Quality	Bld #	Length	Width	Units	Unit Price	Year Built	Roll Year	% Comp	RCN	% Good	DRC	Override Value	Notes

LAND VALUE		DOR Code	600	Neighborhood	6802.23	LAWW - AG	Land Size	633.0300	Unit Type	AC			
#	Code	Description	Zone	Units	Unit Type	Sub Type	Unit Price	Influence 1 Code	Influence 1 %	Influence 2 Code	Influence 2 %	Taxable Value	Land Notes
1	GRZ1	Grazing1	GR	633.03	AA	0	28.69					18,162	

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WFZ2542



Tax District: 4000

printed: 12/26/2017

ACTIVE

6802.23

LAWW - AG

BUILDING PERMITS							
Date	Permit #	Description	Amount	Status	% Comp	Last Visit/Appr/Results	Notes

SALES/TRANSFER INFORMATION							
Grantor	Document	Date	LUC	Verif	Terms	Sales	Notes
STAR LIVING TRUST	4747575	09/25/2017	600	3NTT			
STAR LIVING TRUST	4335755	03/18/2014		3BEA			
SADRI, FRED	3758659	05/12/2009	GRZ1	3BGG			33% INTO TRUST
SADRI, FRED	2900593	08/06/2003	GRZ2	3NTT			FILE # - SPOUSE NO
NEVADA LAND &	2900592	08/06/2003	GRZ2	2MQC	4DEC	1,000,000	A INCLUDES 9 PARCELS
	2117820	07/17/1997					

#	Bld	Date	User ID	Activity Notes
2	0-0	10/12/2012	csarm	REXT LAND AND IMPROVEMENT LINES COMPLETE - LAWW IMPROVEMENT LINE DONE
3	0-0	10/26/2011	kjohn	REXT LAWW IMPROVEMENT LINE DONE 10/26/2011 BY REVIEWED-NO CHGS ON IMP
4	0-0	07/07/2010	kjohn	REXT LAWW IMPROVEMENT LINE DONE 07/07/2010 BY REVIEWED-NO CHGS ON IMP
5	0-0	10/31/2009	kjohn	REXT LAWW IMPROVEMENT LINE DONE 10/31/2009 BY REVIEWED-NO CHANGES ON
6	0-0	10/14/2008	PJO	REXT LAWW IMPROVEMENT LINE DONE 01/00/1900 BY NO CHANGES ON IMP REPORT,
7	0-0	09/15/2006	mbozm	REXT
8	0-0	08/28/2001	RLS	REXT
9	0-0	08/03/2012	csarm	AERL - PICTOMETRY REVIEW
10	0-0	10/18/2016	rlope	REXT BY CSS - 10/14/2016

Situs & Keyline Description:
 0 INTERSTATE 80 E WASHOE COUNTY
 SEC 3 TWP 20 RGE 23

Owner & Mailing Address:
 STAR LIVING TRUST
 SADRI TRUSTEE, FRED
 PO BOX 81624
 LAS VEGAS, NV 89180

WASHOE COUNTY APPRAISAL RECORD 2018

APN: 084-040-04

Card 1 of 1
 Bld. 0-0



Tax District: 4000

printed: 12/26/2017

ACTIVE

6802.23

LAWW - AG

VALUATION HISTORY							PARCEL VALUE SUMMARY		Database	Roll Year	Prior % Complete	% Complete
Roll Year	Taxable Land	Land New	Taxable Improvements	Improvement New	Total Taxable	Total Assessed	Primary Valuation	Building Level Cost	PROD			
2018 NR	9,473	0	0	0	9,473	3,316	Building Value					
2017 FV	10,004	0	0	0	10,004	3,501	Extra Feature Value					
2016 FV	9,435	0	0	0	9,435	3,302	Land Value	9,473				
2015 FV	9,217	0	0	0	9,217	3,226	Taxable Value	9,473				
2014 FV	8,231	0	0	0	8,231	2,881	Exemption	0				
2013 FV	10,113	0	0	0	10,113	3,540	FLAGS					
2012 FV	9,857	0	0	0	9,857	3,450	Type	Value				
2011 FV	9,620	0	0	0	9,620	3,367	Cap Code	NFM				
2010 FV	7,937	0	0	0	7,937	2,778	Eligible for Form?	NO				
2009 FV	7,623	0	0	0	7,623	2,668	Low Cap Percentage	0				
2008 FV	5,998	0	0	0	5,998	2,099	Parcel Map	0				
2007 FV	5,485	0	0	0	5,485	1,920						

BUILDING DETAILS				BUILDING FEATURES AND ADJUSTMENTS				BUILDING SUB-AREAS				BUILDING COST SUMMARY	
Code	Description	Category	Units	Code	Description	Yr Bld	Units	Cost New	Tot Lump Sum Adj				
Type									0				
Occupancy									0				
Story/Frame									100				
Quality									.00				
Year Built	WAY	%Comp	Year of Addn/Remodel						0				
	0	0							0				
BUILDING CHARACTERISTICS									0				
Category	Code	Type	%						0				
									89502				
				Base Rate Adjustment			Adj.						
				Construction Modifiers			Adj.						
				Gross Living/Building Area				0					
				Perimeter				0					
#	Bld	Date	User ID	Activity Notes									
1	0-0	10/22/2013	csarman	REXT LAWW IMPROVEMENT LINE DONE 10/22/2013 BY REVIEWED-NO CHGS ON IMP REPORT, LAND LINE DONE 10/23/2013 BY JAK									

EXTRA FEATURES, ADDITIVES, AND ADJUSTMENTS																
#	Code	Description	Quality	Bld #	Length	Width	Units	Unit Price	Year Built	Roll Year	% Comp	RCN	% Good	DRC	Override Value	Notes

LAND VALUE		DOR Code	600	Neighborhood	6802.23	LAWW - AG	Land Size		640.0800	Unit Type	AC		
#	Code	Description	Zone	Units	Unit Type	Sub Type	Unit Price	Influence 1 Code	Influence 1 %	Influence 2 Code	Influence 2 %	Taxable Value	Land Notes
1	GRZ2	Grazing2	GR	640.08	AA	0	14.80					9,473	

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WFZ2544



BUILDING PERMITS							
Date	Permit #	Description	Amount	Status	% Comp	Last Visit/Appr/Results	Notes

SALES/TRANSFER INFORMATION							
Grantor	Document	Date	LUC	Verif	Terms	Sales	Notes
STAR LIVING TRUST	4747575	09/25/2017	600	3NTT			
STAR LIVING TRUST	4335755	03/18/2014		3BEA			
SADRI, FRED	3758659	05/12/2009	GRZ2	3BGG			33% INTO TRUST
SADRI, FRED	2900593	08/06/2003	GRZ2	3NTT			FILE # - SPOUSE NO
NEVADA LAND &	2900592	08/06/2003	GRZ2	2MQC	4DEC	1,000,000	A INCLUDES 9 PARCELS
	2117820	07/17/1997					

#	Bld	Date	User ID	Activity Notes
2	0-0	10/12/2012	csarm	REXT LAND AND IMPROVEMENT LINES COMPLETE - LAWW IMPROVEMENT LINE DONE
3	0-0	10/26/2011	kjohn	REXT LAWW IMPROVEMENT LINE DONE 10/26/2011 BY REVIEWED-NO CHGS ON IMP
4	0-0	07/07/2010	kjohn	REXT LAWW IMPROVEMENT LINE DONE 07/07/2010 BY REVIEWED-NO CHGS ON IMP
5	0-0	10/31/2009	kjohn	REXT LAWW IMPROVEMENT LINE DONE 10/31/2009 BY REVIEWED-NO CHANGES ON
6	0-0	10/14/2008	PJO	REXT LAWW IMPROVEMENT LINE DONE 01/00/1900 BY NO CHANGES ON IMP REPORT,
7	0-0	09/15/2006	mbozm	REXT
8	0-0	08/28/2001	RLS	REXT
9	0-0	08/03/2012	csarm	AERL - PICTOMETRY REVIEW
10	0-0	10/18/2016	rlope	REXT BY CSS - 10/14/2016

Situs & Keyline Description:
 0 PIERSON CANYON RD WASHOE COUNTY
 SEC 5 TWP 20 RGE 23

Owner & Mailing Address:
 STAR LIVING TRUST
 SADRI TRUSTEE, FRED
 PO BOX 81624
 LAS VEGAS, NV 89180

WASHOE COUNTY APPRAISAL RECORD 2018

APN: 084-040-02

Card 1 of 1
 Bld. 0-0



Tax District: 4000

printed: 12/26/2017

ACTIVE

6802.23

LAWW - AG

VALUATION HISTORY								PARCEL VALUE SUMMARY		Database	Roll Year	Prior % Complete	% Complete
Roll Year	Taxable Land	Land New	Taxable Improvements	Improvement New	Total Taxable	Total Assessed	Primary Valuation	Building Level Cost	PROD				
2018 NR	9,283	0	0	0	9,283	3,249	Building Value						
2017 FV	9,804	0	0	0	9,804	3,431	Extra Feature Value						
2016 FV	9,246	0	0	0	9,246	3,236	Land Value	9,283					
2015 FV	9,032	0	0	0	9,032	3,161	Taxable Value	9,283					
2014 FV	8,066	0	0	0	8,066	2,823	Exemption	0					
2013 FV	9,910	0	0	0	9,910	3,469	FLAGS						
2012 FV	9,659	0	0	0	9,659	3,381	Type	Value					
2011 FV	9,427	0	0	0	9,427	3,299	Cap Code	NFM					
2010 FV	7,778	0	0	0	7,778	2,722	Eligible for Form?	NO					
2009 FV	7,470	0	0	0	7,470	2,615	Low Cap Percentage	0					
2008 FV	5,877	0	0	0	5,877	2,057	Parcel Map	0					
2007 FV	5,375	0	0	0	5,375	1,881							

BUILDING DETAILS				BUILDING FEATURES AND ADJUSTMENTS				BUILDING SUB-AREAS				BUILDING COST SUMMARY	
Code	Description	Category	Units	Code	Description	Yr Bld	Units	Cost New	Tot Lump Sum Adj				
Type									0				
Occupancy									0				
Story/Frame									100				
Quality									.00				
Year Built	WAY	%Comp	Year of Addn/Remodel						0				
									0				
BUILDING CHARACTERISTICS									0				
Category	Code	Type	%						0				
									0				
									89502				
PROPERTY CHARACTERISTICS													
Base Rate Adjustment								Adj.					
Construction Modifiers													
Construction Modifiers								Adj.					
Gross Living/Building Area							0						
Perimeter							0						

#	Bld	Date	User ID	Activity Notes
1	0-0	10/22/2013	csarman	RXT LAWV IMPROVEMENT LINE DONE 10/22/2013 BY REVIEWED-NO CHGS ON IMP REPORT, LAND LINE DONE 10/23/2013 BY JAK

EXTRA FEATURES, ADDITIVES, AND ADJUSTMENTS																
#	Code	Description	Quality	Bld #	Length	Width	Units	Unit Price	Year Built	Roll Year	% Comp	RCN	% Good	DRC	Override Value	Notes

LAND VALUE	DOR Code	600	Neighborhood	6802.23	LAWW - AG	Land Size	627.2400	Unit Type	AC				
#	Code	Description	Zone	Units	Unit Type	Sub Type	Unit Price	Influence 1 Code	Influence 1 %	Influence 2 Code	Influence 2 %	Taxable Value	Land Notes
1	GRZ2	Grazing2	GR	627.24	AA	0	14.80					9,283	

This information is for use by the Washoe County Assessor for assessment purposes only.

WFZ2546



Tax District: 4000

printed: 12/26/2017

ACTIVE

6802.23

LAWW - AG



BUILDING PERMITS

Date	Permit #	Description	Amount	Status	% Comp	Last Visit/Appr/Results	Notes

SALES/TRANSFER INFORMATION

Grantor	Document	Date	LUC	Verif	Terms	Sales	Notes
STAR LIVING TRUST	4747575	09/25/2017	600	3NTT			ORDER FROM JULY 17 2008
STAR LIVING TRUST	4630133	09/08/2016	600	3BF		5,000	
STAR LIVING TRUST	4335755	03/18/2014		3BEA			
SADRI, FRED	3758659	05/12/2009	GRZ2	3BGG			33% INTO TRUST
SADRI, FRED	2900593	08/06/2003	GRZ2	3BCT			FILE # - SPOUSE NO
NEVADA LAND &	2900592	08/06/2003	GRZ2	2MQC	4DEC	1,000,000	A INCLUDES 9 PARCELS

#	Bld	Date	User ID	Activity Notes
2	0-0	10/12/2012	csarm	REXT LAND AND IMPROVEMENT LINES COMPLETE - LAWV IMPROVEMENT LINE DONE
3	0-0	10/26/2011	kjohn	REXT LAWV IMPROVEMENT LINE DONE 10/26/2011 BY REVIEWED-NO CHGS ON IMP
4	0-0	07/07/2010	kjohn	REXT LAWV IMPROVEMENT LINE DONE 07/07/2010 BY REVIEWED-NO CHGS ON IMP
5	0-0	10/31/2009	kjohn	REXT LAWV IMPROVEMENT LINE DONE 10/31/2009 BY REVIEWED-NO CHANGES ON
6	0-0	10/14/2008	PJO	REXT LAWV IMPROVEMENT LINE DONE 01/00/1900 BY NO CHANGES ON IMP REPORT,
7	0-0	09/15/2006	mbozm	REXT
8	0-0	08/28/2001	RLS	REXT
9	0-0	08/03/2012	csarm	AERL - PICTOMETRY REVIEW
10	0-0	10/18/2016	rlope	REXT BY CSS - 10/14/2016

This information is for use by the Washoe County Assessor for assessment purposes only.

WFZ2547

Situs & Keyline Description:
 0 STATE ROUTE 447 WASHOE COUNTY
 NE4 S2 NW4 S2 SEC 27 TWP 21 RGE 23

Owner & Mailing Address:
 STAR LIVING TRUST
 SADRI TRUSTEE, FRED
 PO BOX 81624
 LAS VEGAS, NV 89180

WASHOE COUNTY APPRAISAL RECORD 2018

APN: 079-150-13

Card 1 of 1
 Bld. 0-0



Tax District: 4000

printed: 12/26/2017

ACTIVE

6802.23

LAWW - AG

VALUATION HISTORY							PARCEL VALUE SUMMARY		Database	Roll Year	Prior % Complete	% Complete
Roll Year	Taxable Land	Land New	Taxable Improvements	Improvement New	Total Taxable	Total Assessed	Primary Valuation	Building Level Cost	PROD			
2018 NR	8,288	0	0	0	8,288	2,901	Building Value					
2017 FV	8,753	0	0	0	8,753	3,064	Extra Feature Value					
2016 FV	8,254	0	0	0	8,254	2,889	Land Value	8,288				
2015 FV	8,064	0	0	0	8,064	2,822	Taxable Value	8,288				
2014 FV	7,202	0	0	0	7,202	2,521	Exemption	0				
2013 FV	8,848	0	0	0	8,848	3,097	FLAGS					
2012 FV	8,624	0	0	0	8,624	3,018	Type	Value				
2011 FV	8,417	0	0	0	8,417	2,946	Cap Code	NFM				
2010 FV	6,944	0	0	0	6,944	2,430	Eligible for Form?	NO				
2009 FV	6,670	0	0	0	6,670	2,335	Low Cap Percentage	0				
2008 FV	5,247	0	0	0	5,247	1,836						
2007 FV	4,799	0	0	0	4,799	1,680						

BUILDING DETAILS				BUILDING FEATURES AND ADJUSTMENTS				BUILDING SUB-AREAS				BUILDING COST SUMMARY	
Code	Description	Category	Units	Code	Description	Yr Bld	Units	Cost New	Tot Lump Sum Adj				
Type									Sub Area-RCN	0			
Occupancy									% Incomplete	100			
Story/Frame									% Depreciation	.00			
Quality									\$ Dep & Inc	0			
Year Built	WAY	%Comp	Year of Addn/Remodel						Obso/Other Adj.	0			
	0	0							Sub Area DRC	0			
BUILDING CHARACTERISTICS									Additive DRC	0			
Category	Code	Type	%						Total DRC				
									Override	0			
									Cost Code	89502			
				Base Rate Adjustment				Adj.					
				Construction Modifiers				Adj.					
				Gross Living/Building Area				0					
				Perimeter				0					

#	Bld	Date	User ID	Activity Notes
1	0-0	10/22/2013	csarman	REXT LAWW IMPROVEMENT LINE DONE 10/22/2013 BY REVIEWED-NO CHGS ON IMP REPORT, LAND LINE DONE 10/23/2013 BY JAK

EXTRA FEATURES, ADDITIVES, AND ADJUSTMENTS																
#	Code	Description	Quality	Bld #	Length	Width	Units	Unit Price	Year Built	Roll Year	% Comp	RCN	% Good	DRC	Override Value	Notes

LAND VALUE		DOR Code	600	Neighborhood	6802.23	LAWW - AG	Land Size		560.0000	Unit Type	AC		
#	Code	Description	Zone	Units	Unit Type	Sub Type	Unit Price	Influence 1 Code	Influence 1 %	Influence 2 Code	Influence 2 %	Taxable Value	Land Notes
1	GRZ2	Grazing2	GR	560.00	AA	0	14.80					8,288	

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Tax District: 4000

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LAWW - AG



BUILDING PERMITS							
Date	Permit #	Description	Amount	Status	% Comp	Last Visit/Appr/Results	Notes

SALES/TRANSFER INFORMATION							
Grantor	Document	Date	LUC	Verif	Terms	Sales	Notes
STAR LIVING TRUST	4747575	09/25/2017	600	3NTT			
STAR LIVING TRUST	4335755	03/18/2014		3BEA			
SADRI, FRED	3758659	05/12/2009	GRZ2	3BGG			33% INTO TRUST
SADRI, FRED	2900593	08/06/2003	GRZ2	3NTT			FILE # - SPOUSE NO
NEVADA LAND &	2900592	08/06/2003	GRZ2	2MQC	4DEC	1,000,000	A INCLUDES 9 PARCELS
NEVADA LAND &	2603875	10/08/2001	GRZ2	3NTT			

#	Bld	Date	User ID	Activity Notes
2	0-0	10/12/2012	csarm	REXT LAND AND IMPROVEMENT LINES COMPLETE - LAWW IMPROVEMENT LINE DONE
3	0-0	10/26/2011	kjohn	REXT LAWW IMPROVEMENT LINE DONE 10/26/2011 BY REVIEWED-NO CHGS ON IMP
4	0-0	07/07/2010	kjohn	REXT LAWW IMPROVEMENT LINE DONE 07/07/2010 BY REVIEWED-NO CHGS ON IMP
5	0-0	10/31/2009	kjohn	REXT LAWW IMPROVEMENT LINE DONE 10/31/2009 BY REVIEWED-NO CHANGES ON
6	0-0	10/14/2008	PJO	REXT LAWW IMPROVEMENT LINE DONE 01/00/1900 BY NO CHANGES ON IMP REPORT,
7	0-0	08/25/2006	mbozm	REXT
8	0-0	08/28/2001	RLS	REXT
9	0-0	08/03/2012	csarm	AERL - PICTOMETRY REVIEW
10	0-0	10/18/2016	rlope	REXT BY CSS - 10/14/2016

Situs & Keyline Description:
 0 STATE ROUTE 447 WASHOE COUNTY
 SEC 31 TWP 21 RGE 23

Owner & Mailing Address:
 STAR LIVING TRUST
 SADRI TRUSTEE, FRED
 PO BOX 81624
 LAS VEGAS, NV 89180

WASHOE COUNTY APPRAISAL RECORD 2018

APN: 079-150-10

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Tax District: 4000

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LAWW - AG

VALUATION HISTORY							PARCEL VALUE SUMMARY		Database	Roll Year	Prior % Complete	% Complete
Roll Year	Taxable Land	Land New	Taxable Improvements	Improvement New	Total Taxable	Total Assessed	Primary Valuation	Building Level Cost	PROD			
						Building Value						
2018 NR	9,466	0	0	0	9,466	3,313	Extra Feature Value					
2017 FV	9,997	0	0	0	9,997	3,499	Land Value	9,466				
2016 FV	9,427	0	0	0	9,427	3,299	Taxable Value	9,466				
2015 FV	9,210	0	0	0	9,210	3,224	Exemption	0			Reopen	Code:
2014 FV	8,225	0	0	0	8,225	2,879	FLAGS				Reappraisal	
2013 FV	10,105	0	0	0	10,105	3,537	Type	Value				
2012 FV	9,850	0	0	0	9,850	3,447	Cap Code	NFM			NC / C	New Land
2011 FV	9,613	0	0	0	9,613	3,365	Eligible for Form?	NO				New Sketch
2010 FV	7,931	0	0	0	7,931	2,776	Low Cap Percentage	0			By:	Date:
2009 FV	7,617	0	0	0	7,617	2,666	Parcel Map	0				
2008 FV	5,993	0	0	0	5,993	2,098						
2007 FV	5,481	0	0	0	5,481	1,918						

BUILDING DETAILS				BUILDING FEATURES AND ADJUSTMENTS				BUILDING SUB-AREAS				BUILDING COST SUMMARY	
Code	Description			Category	Units	Code	Description	Yr Bld	Units	Cost New	Tot Lump Sum Adj		
Type											0		
Occupancy											0		
Story/Frame											100		
Quality											.00		
Year Built	WAY	%Comp	Year of Addn/Remodel								\$ Dep & Inc	0	
	0	0									Obso/Other Adj.	0	
BUILDING CHARACTERISTICS											Sub Area DRC	0	
Category	Code	Type	%								Additive DRC	0	
											Total DRC		
											Override	0	
											Cost Code	89502	
											PROPERTY CHARACTERISTICS		
											Special Prop Code	Ag Land - Current -	
											Water	None	
											Sewer	None	
											Street	None	
											BUILDING NOTES		
											Gross Living/Building Area	0	
											Perimeter	0	

#	Bld	Date	User ID	Activity Notes
1	0-0	10/22/2013	csarman	REXT LAWW IMPROVEMENT LINE DONE 10/22/2013 BY REVIEWED-NO CHGS ON IMP REPORT, LAND LINE DONE 10/23/2013 BY JAK

EXTRA FEATURES, ADDITIVES, AND ADJUSTMENTS																
#	Code	Description	Quality	Bld #	Length	Width	Units	Unit Price	Year Built	Roll Year	% Comp	RCN	% Good	DRC	Override Value	Notes

LAND VALUE		DOR Code	600	Neighborhood	6802.23	LAWW - AG	Land Size		639.5800	Unit Type	AC		
#	Code	Description	Zone	Units	Unit Type	Sub Type	Unit Price	Influence 1 Code	Influence 1 %	Influence 2 Code	Influence 2 %	Taxable Value	Land Notes
1	GRZ2	Grazing2	GR	639.58	AA	0	14.80					9,466	

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Tax District: 4000

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LAWW - AG

BUILDING PERMITS							
Date	Permit #	Description	Amount	Status	% Comp	Last Visit/Appr/Results	Notes

SALES/TRANSFER INFORMATION							
Grantor	Document	Date	LUC	Verif	Terms	Sales	Notes
STAR LIVING TRUST	4747575	09/25/2017	600	3NTT			ORDER FROM JULY 17 2008
STAR LIVING TRUST	4630135	09/08/2016	600	3BF		5,000	
STAR LIVING TRUST	4335755	03/18/2014		3BEA			
SADRI, FRED	3758659	05/12/2009	GRZ2	3BGG			33% INTO TRUST
SADRI, FRED	2900593	08/06/2003	GRZ2	3NTT			FILE # - SPOUSE NO
NEVADA LAND &	2900592	08/06/2003	GRZ2	2MQC	4DEC	1,000,000	A INCLUDES 9 PARCELS

#	Bld	Date	User ID	Activity Notes
2	0-0	10/12/2012	csarm	REXT LAND AND IMPROVEMENT LINES COMPLETE - LAWV IMPROVEMENT LINE DONE
3	0-0	10/26/2011	kjohn	REXT LAWV IMPROVEMENT LINE DONE 10/26/2011 BY REVIEWED-NO CHGS ON IMP
4	0-0	07/07/2010	kjohn	REXT LAWV IMPROVEMENT LINE DONE 07/07/2010 BY REVIEWED-NO CHGS ON IMP
5	0-0	10/31/2009	kjohn	REXT LAWV IMPROVEMENT LINE DONE 10/31/2009 BY REVIEWED-NO CHANGES ON
6	0-0	10/14/2008	PJO	REXT LAWV IMPROVEMENT LINE DONE 01/00/1900 BY NO CHANGES ON IMP REPORT,
7	0-0	08/25/2006	mbozm	REXT
8	0-0	08/28/2001	RLS	REXT
9	0-0	08/03/2012	csarm	AERL - PICTOMETRY REVIEW
10	0-0	10/18/2016	rlope	REXT BY CSS - 10/14/2016

Situs & Keyline Description:
 0 STATE ROUTE 447 WASHOE COUNTY
 FR NW4 SW2 SEC 33 TWP 21 RGE 23

Owner & Mailing Address:
 STAR LIVING TRUST
 SADRI TRUSTEE, FRED
 PO BOX 81624
 LAS VEGAS, NV 89180

WASHOE COUNTY APPRAISAL RECORD 2018

APN: 079-150-09

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Tax District: 4000

printed: 12/26/2017

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6802.23

LAWW - AG

VALUATION HISTORY							PARCEL VALUE SUMMARY		Database	Roll Year	Prior % Complete	% Complete
Roll Year	Taxable Land	Land New	Taxable Improvements	Improvement New	Total Taxable	Total Assessed	Primary Valuation	Building Level Cost	PROD			
2018 NR	8,288	0	0	0	8,288	2,901	Building Value					
2017 FV	8,753	0	0	0	8,753	3,064	Extra Feature Value					
2016 FV	8,254	0	0	0	8,254	2,889	Land Value	8,288				
2015 FV	8,064	0	0	0	8,064	2,822	Taxable Value	8,288				
2014 FV	7,202	0	0	0	7,202	2,521	Exemption	0			Reopen	Code:
2013 FV	8,848	0	0	0	8,848	3,097	FLAGS				Reappraisal	
2012 FV	8,624	0	0	0	8,624	3,018	Type	Value				
2011 FV	8,417	0	0	0	8,417	2,946	Cap Code	NFM				
2010 FV	6,944	0	0	0	6,944	2,430	Eligible for Form?	NO		NC / C	New Land	New Sketch
2009 FV	6,670	0	0	0	6,670	2,335	Low Cap Percentage	0				
2008 FV	5,247	0	0	0	5,247	1,836	Parcel Map	0				
2007 FV	4,799	0	0	0	4,799	1,680				By:		Date:

BUILDING DETAILS				BUILDING FEATURES AND ADJUSTMENTS				BUILDING SUB-AREAS				BUILDING COST SUMMARY	
Code	Description	Category	Units	Code	Description	Yr Bld	Units	Cost New	Tot Lump Sum Adj				
Type										Sub Area-RCN	0		
Occupancy										% Incomplete	100		
Story/Frame										% Depreciation	.00		
Quality										\$ Dep & Inc	0		
Year Built	WAY	%Comp	Year of Addn/Remodel							Obso/Other Adj.	0		
	0	0								Sub Area DRC	0		
BUILDING CHARACTERISTICS										Additive DRC	0		
Category	Code	Type	%							Total DRC			
										Override	0		
										Cost Code	89502		
										PROPERTY CHARACTERISTICS			
										Special Prop Code	Ag Land - Current -		
										Water	None		
										Sewer	None		
										Street	None		
										BUILDING NOTES			
										Gross Living/Building Area	0		
										Perimeter	0		

#	Bld	Date	User ID	Activity Notes
1	0-0	10/22/2013	csarman	REXT LAWV IMPROVEMENT LINE DONE 10/22/2013 BY REVIEWED-NO CHGS ON IMP REPORT, LAND LINE DONE 10/23/2013 BY JAK

EXTRA FEATURES, ADDITIVES, AND ADJUSTMENTS																
#	Code	Description	Quality	Bld #	Length	Width	Units	Unit Price	Year Built	Roll Year	% Comp	RCN	% Good	DRC	Override Value	Notes

LAND VALUE		DOR Code	600	Neighborhood	6802.23	LAWW - AG	Land Size		560.0000	Unit Type	AC		
#	Code	Description	Zone	Units	Unit Type	Sub Type	Unit Price	Influence 1 Code	Influence 1 %	Influence 2 Code	Influence 2 %	Taxable Value	Land Notes
1	GRZ2	Grazing2	GR	560.00	AA	0	14.80					8,288	

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Tax District: 4000

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LAWW - AG



BUILDING PERMITS							
Date	Permit #	Description	Amount	Status	% Comp	Last Visit/Appr/Results	Notes

SALES/TRANSFER INFORMATION							
Grantor	Document	Date	LUC	Verif	Terms	Sales	Notes
STAR LIVING TRUST	4747575	09/25/2017	600	3NTT			
STAR LIVING TRUST	4335755	03/18/2014		3BEA			
SADRI, FRED	3758659	05/12/2009	GRZ2	3BGG			33% INTO TRUST
SADRI, FRED	2900593	08/06/2003	GRZ2	3NTT			FILE # - SPOUSE NO
NEVADA LAND &	2900592	08/06/2003	GRZ2	2MQC	4DEC	1,000,000	A INCLUDES 9 PARCELS
NEVADA LAND &	2507304	12/13/2000		3NTT			INC 079-150-09,11,13

#	Bld	Date	User ID	Activity Notes
2	0-0	10/12/2012	csarm	REXT LAND AND IMPROVEMENT LINES COMPLETE - LAWV IMPROVEMENT LINE DONE
3	0-0	10/26/2011	kjohn	REXT LAWV IMPROVEMENT LINE DONE 10/26/2011 BY REVIEWED-NO CHGS ON IMP
4	0-0	07/07/2010	kjohn	REXT LAWV IMPROVEMENT LINE DONE 07/07/2010 BY REVIEWED-NO CHGS ON IMP
5	0-0	10/31/2009	kjohn	REXT LAWV IMPROVEMENT LINE DONE 10/31/2009 BY REVIEWED-NO CHANGES ON
6	0-0	10/14/2008	PJO	REXT LAWV IMPROVEMENT LINE DONE 01/00/1900 BY NO CHANGES ON IMP REPORT,
7	0-0	08/25/2006	mbozm	REXT
8	0-0	09/12/2003	zzz	
9	0-0	09/05/2003	ZZZ	
10	0-0	08/28/2001	RLS	REXT