

GABROY | MESSER
170 South Green Valley Pkwy., Suite 280
Henderson, Nevada 89012
(702) 259-7777 FAX: (702) 259-7704

1 **COMJD**
Christian Gabroy
2 Nev. Bar No. 8805
Kaine Messer
3 Nev. Bar No. 14240
GABROY | MESSER
4 The District at Green Valley Ranch
170 South Green Valley Parkway
5 Suite 280
Henderson, Nevada 89012
6 Tel: (702) 259-7777
Fax: (702) 259-7704
7 christian@gabroy.com
kmesser@gabroy.com

8
9 Joshua D. Buck
Nev. Bar No. 12187
Leah L. Jones
10 Nev. Bar No. 13161
THIERMAN BUCK LLP
11 325 West Liberty Street
Reno, Nevada 89501
12 Tel: (775) 284-1500
Fax: (775) 703-5027
13 josh@thiermanbuck.com
leah@thiermanbuck.com

14 *Attorneys for Plaintiff*

**DISTRICT COURT
CLARK COUNTY, NEVADA**

17 CHELSEA RANDA, on behalf of herself
and all others similarly situated,

18 Plaintiff,

19 vs.

20 LISA/CARRISON LTD. d/b/a and a/k/a
21 LISA CARRISON LLC also d/b/a and
a/k/a PUTTER'S BAR & GRILL; DOES 1
22 through 50; inclusive,

23 Defendant(s).

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6/25/2025 11:18 AM
Steven D. Grierson
CLERK OF THE COURT



CASE NO: A-25-921889-C
Department 18

Case No.:
Dept.:

CLASS ACTION COMPLAINT

**Arbitration Exemption Claimed:
Class Action**

- 1) Failure to Pay Overtime in Violation of NRS §§ 608.018 and 608.140;
- 2) Failure to Timely Pay All Wages Due and Owing in Violation of NRS §§ 608.020-050 and 608.140; and,
- 3) Injunctive Relief.

**LIEN REQUESTED PURSUANT TO
NRS § 608.050**

JURY TRIAL DEMANDED

1 Plaintiff Chelsea Randa (“Plaintiff” or “Randa”) on behalf of herself and all others
2 similarly situated and alleges the following:

3 All allegations in the Complaint are based upon information and belief except for
4 those allegations that pertain to the Plaintiff named herein and her counsel. Each
5 allegation in the Complaint either has evidentiary support or is likely to have evidentiary
6 support after a reasonable opportunity for further investigation and discovery.

7 **JURISDICTION AND VENUE**

8 1. This Court has original jurisdiction over the state law claims alleged herein
9 because the amount in controversy exceeds \$15,000.00 and a party seeking to recover
10 unpaid wages has a private right of action pursuant to the Nevada Constitution, Article
11 15 Section 16, and Nevada Revised Statute (“NRS”) sections 608.050 and 608.140. See
12 *Neville v. Eighth Judicial Dist. Court in & for County of Clark*, 406 P.3d 499, 502 (Nev.
13 2017); *HG Staffing, LLC, et al. v Second Judicial District Court*, Nevada Supreme Court
14 Case No. 79118 (May 7, 2020).

15 2. Plaintiff also claims a private cause of action to foreclose a lien against the
16 property owner for wages due pursuant to NRS § 608.050.

17 3. Plaintiff made a proper demand for wages due pursuant to NRS § 608.140.

18 4. Venue is proper in this Court because the Defendant named herein
19 maintains a principal place of business or otherwise is found in this judicial district and
20 many of the acts complained of herein occurred in Clark County, Nevada.

21 5. Plaintiff demands a jury trial on all issues triable by jury herein.

22 **PARTIES**

23 6. Plaintiff was at all relevant times a resident of the State of Nevada and was
24 employed by Defendant as a non-exempt hourly employee from October 2023 to
25 February 2024.

26 7. Defendant Lisa/Carrison Ltd. d/b/a and a/k/a Lisa Carrison LLC also d/b/a
27 and a/k/a Putter’s Bar & Grill (“Defendant”) is a domestic limited-liability company listed
28 with the Nevada Secretary of State.

1 See a true and correct copy of Plaintiff's time records attached hereto as Exhibit I.

2 18. But despite having worked more than 8 hours in a 24-hour period of time,
3 Defendant failed to compensate Plaintiff at 1 ½ times her regular rate of pay for the
4 overtime hours she worked. See a true and correct copy of Plaintiff's paystub attached
5 hereto as Exhibit II.

6 19. Similarly, during the workweek of November 18, 2023, Defendant
7 scheduled Plaintiff to work and Plaintiff did work over 8 hours in a 24-hour period of time.
8 See Exhibit I.

9 20. But despite having worked more than 8 hours in a 24-hour period of time,
10 Defendant failed to compensate Plaintiff at 1 ½ times her regular rate of pay for the
11 overtime hours she worked. See Exhibit II.

12 21. Upon information and belief, Defendant maintains a company-wide policy
13 and practice of refusing to pay full daily overtime wages to Nevada employees who
14 worked over 8 hours in a workday.

15 22. This "no full daily overtime" policy has always been common to all non-
16 exempt hourly paid employees at Defendant's locations in the state of Nevada.

17 **CLASS ACTION ALLEGATIONS**

18 23. Plaintiff realleges and incorporates by this reference all the paragraphs
19 above in this Complaint as though fully set forth herein.

20 24. Plaintiff brings this action on behalf of herself and all other similarly situated
21 employees as a class action under Rule 23 of the Nevada Rules of Civil Procedure.

22 25. The **Nevada Overtime Class** is defined as "All hourly paid non-exempt
23 persons employed by Defendant in the state of Nevada who earned less than 1 ½ times
24 the applicable minimum wage and who worked over eight (8) hours in a workday at any
25 time within 3 years until judgment."

26 26. The **Waiting Time Wages Class** is defined as "All Nevada Overtime Class
27 Members who are former employees of Defendant."
28

1 27. Class treatment is appropriate under Rule 23's class certification
2 mechanism because:

3 a. The Classes are Sufficiently Numerous: Upon information and belief,
4 Defendant employs, and has employed, in excess of 40 Nevada Overtime Class
5 Members within the applicable time period. Because Defendant is legally obligated to
6 keep accurate payroll records, Plaintiff alleges that Defendant's records will establish the
7 members of the Classes as well as their numerosity.

8 b. Plaintiff's Claim is Typical to Those of Fellow Class Members: Each
9 Class Member is and was subject to the same practices, plans, or policies as Plaintiff:
10 whether Defendant compensated Plaintiff and members of the Class daily overtime
11 wages when they worked over 8 hours in a workday and whether members of the
12 Waiting Time Wages Class are entitled to waiting time wages for the failure to pay them
13 minimum, regular, and overtime wages owed.

14 c. Common Questions of Law and Fact Exist: Common questions of
15 law and fact exist and predominate as to Plaintiff and the Class Members, including,
16 without limitation: whether Defendant failed to pay Plaintiff and the Class Members one
17 and one-half times their regular rate for all hours worked in excess of 8 hours a workday
18 and whether Defendant failed to pay the Waiting Time Wages Class Members all their
19 wages due and owing in violation of NRS § 608.020-050.

20 d. Plaintiff is Adequate Representative of the Class: Plaintiff will fairly
21 and adequately represent the interests of the Classes because Plaintiff is a member of
22 the Classes, she has issues of law and fact in common with all members of the Classes,
23 and her interests are not antagonistic to Class members. Plaintiff and her counsel are
24 aware of their fiduciary responsibilities to Class Members and are determined to
25 discharge those duties diligently by vigorously seeking the maximum possible recovery
26 for Class Members.

27 e. Predominance/Superior Mechanism: Class claims predominate and
28 a class action is superior to other available means for the fair and efficient adjudication of

1 this controversy. Each Class Member has been damaged and is entitled to recovery by
2 reason of Defendant's illegal policy and/or practice of failing to compensate its
3 employees in accordance with Nevada wage and hour law. The prosecution of individual
4 remedies by each Class Member will tend to establish inconsistent standards of conduct
5 for Defendant and result in the impairment of Class Members' rights and the disposition
6 of their interest through actions to which they were not parties.

7 **FIRST CAUSE OF ACTION**
8 **Failure to Pay Overtime Wages in Violation of NRS §§ 608.018 and 608.140**
9 **(On Behalf of Plaintiff and the Nevada Overtime Class)**

10 28. Plaintiff realleges and incorporates by this reference all the paragraphs
11 above in this Complaint as though fully set forth herein.

12 29. NRS § 608.140 provides that an employee has a private right of action for
13 unpaid wages.

14 30. NRS § 608.018(1) provides as follows:

15 An employer shall pay 1 1/2 times an employee's
16 regular wage rate whenever an employee who receives
17 compensation for employment at a rate less than 1 1/2 times
18 the minimum rate prescribed pursuant to NRS 608.250
19 works: (a) More than 40 hours in any scheduled week of
20 work; or (b) More than 8 hours in any workday unless by
21 mutual agreement the employee works a scheduled 10
22 hours per day for 4 calendar days within any scheduled
23 week of work.

24 31. NRS § 608.018(2) provides as follows:

25 An employer shall pay 1 1/2 times an employee's regular
26 wage rate whenever an employee who receives
27 compensation for employment at a rate not less than 1 1/2
28 times the minimum rate prescribed pursuant to NRS 608.250
works more than 40 hours in any scheduled week of work.

32. As described above, Defendant maintains a policy and/or practice of illegal
shift jamming (i.e., refusing to pay daily overtime when Plaintiff and members of the
Nevada Overtime Class worked over 8 hours in a workday). As a result, Plaintiff and
Nevada Overtime Class Members have been denied overtime compensation according
to Nevada law.

1 until the employee is paid in full, without rendering any service therefore; but the
2 employee shall cease to draw such wages or salary 30 days after such default.”

3 40. By failing to pay Waiting Time Wages Class Members their minimum,
4 regular, and overtime wages in violation of state and federal law, Defendant has failed to
5 timely remit all wages due and owing to the Waiting Time Wages Class Members.

6 41. Despite demand, Defendant willfully refused and continue to refuse to pay
7 Waiting Time Wages Class Members all the wages that were due and owing upon the
8 termination of their employment.

9 42. Wherefore, the Waiting Time Wages Class Members demand thirty (30)
10 days of pay as waiting wages under NRS §§ 608.040 and 608.140, and thirty (30) days
11 of pay as waiting wages under NRS §§ 608.050 and 608.140, together with attorneys’
12 fees, costs, interest, and punitive damages, as provided by law.

13 **THIRD CAUSE OF ACTION**
14 **Injunctive/Declaratory Relief**
15 **(On Behalf of Plaintiff and the Nevada Overtime Class)**

16 43. Plaintiff realleges and incorporates by this reference all the paragraphs
17 above in this Complaint as though fully set forth herein.

18 44. As Defendant has failed to compensate Plaintiff and members of the
19 Overtime Class at the correct overtime wage rate for all the overtime hours that they
20 worked pursuant to NRS § 608.018, Defendant has wrongfully withheld wages properly-
21 owed to the Plaintiff and the Overtime Class Members.

22 45. Plaintiff and the Nevada Overtime Class will suffer irreparable injury if
23 Defendant is not enjoined from the future wrongful retention of wages owed.

24 46. As a result of the aforementioned unlawful payment practices, Plaintiff
25 submits that there has been a likelihood of success on the merits that Plaintiff and the
26 Class Members have been damaged, that there is irreparable harm, and Plaintiff
27 requests that this Honorable Court enter an Order that restrains Defendant from
28 attempting to enforce the alleged unlawful payment practices.

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- 11. For costs of suit incurred herein;
- 12. For pre-judgment and post-judgment interest, as provided by law; and,
- 13. For such other and further relief as the Court may deem just and proper.

DATED: June 25, 2025

Respectfully submitted,

GABROY | MESSER

By: /s/ Christian Gabroy
Christian Gabroy
Nev. Bar No. 8805
Kaine Messer
Nev. Bar No. 14240
The District at Green Valley Ranch
170 South Green Valley Parkway
Suite 280
Henderson, NV 89012
Tel: (702) 259-7777
Fax: (702) 259-7704
christian@gabroy.com
kmesser@gabroy.com

Joshua D. Buck
Nev. Bar No. 12187
Leah L. Jones
Nev. Bar No. 13161
Thierman Buck LLP
325 West Liberty Street
Reno, Nevada 89501
Tel: (775) 284-1500
Fax: (775) 703-5027
josh@thiermanbuck.com
leah@thiermanbuck.com

Attorneys for Plaintiff

EXHIBIT I

RANDA, CHELSEA
 (X89974)
 L:HORIZON - 13
 HOUR COUNT
 Regula 249.17
 Overtime 1.23
 TOTAL HRS 250.40

							Sun 10/1
Mon 10/2	Tue 10/3	Wed 10/4	Thu 10/5	Fri 10/6	Sat 10/7	Sun 10/8	
Mon 10/9	Tue 10/10	Wed 10/11 615p-840p HRS 2.42	Thu 10/12 431p-750p HRS 3.32	Fri 10/13 427p-1258a HRS 8.51	Sat 10/14	Sun 10/15	
Mon 10/16	Tue 10/17	Wed 10/18	Thu 10/19	Fri 10/20 430p-1244a HRS 8.23	Sat 10/21 430p-1101p HRS 6.51	Sun 10/22	
Mon 10/23	Tue 10/24	Wed 10/25	Thu 10/26 432p-1229a HRS 7.94	Fri 10/27 427p-1000p HRS 5.56	Sat 10/28 431p-1002p HRS 5.52	Sun 10/29	
Mon 10/30	Tue 10/31 437p-755p HRS 3.29	Wed 11/1	Thu 11/2 436p-958p HRS 5.38	Fri 11/3 439p-1157p HRS 7.30	Sat 11/4 436p-1113p HRS 6.62	Sun 11/5	
Mon 11/6	Tue 11/7	Wed 11/8	Thu 11/9 425p-815p HRS 3.83	Fri 11/10 431p-1213a HRS 7.69	Sat 11/11 433p-904p HRS 4.52	Sun 11/12	
Mon 11/13	Tue 11/14	Wed 11/15	Thu 11/16 434p-727p HRS 2.89	Fri 11/17 347p-1011p HRS 6.41	Sat 11/18 355p-1043p HRS 6.79	Sun 11/19 852a-120p HRS 4.47	
Mon 11/20	Tue 11/21	Wed 11/22	Thu 11/23	Fri 11/24 435p-1051p HRS 6.26	Sat 11/25 435p-1028p HRS 5.88	Sun 11/26	
Mon 11/27	Tue 11/28 439p-733p HRS 2.89	Wed 11/29	Thu 11/30 604p-843p HRS 2.65	Fri 12/1 441p-1145p HRS 7.07	Sat 12/2 450p-1133p HRS 6.72	Sun 12/3	
Mon 12/4	Tue 12/5	Wed 12/6	Thu 12/7 458p-727p HRS 2.48	Fri 12/8 439p-1054p HRS 6.26	Sat 12/9 436p-738p HRS 3.03	Sun 12/10	
Mon 12/11	Tue 12/12	Wed 12/13	Thu 12/14 434p-925p HRS 4.86	Fri 12/15	Sat 12/16 346p-739p HRS 3.87	Sun 12/17	
Mon 12/18	Tue 12/19	Wed 12/20	Thu 12/21 448p-904p HRS 4.26	Fri 12/22 437p-843p HRS 4.09	Sat 12/23 438p-707p HRS 2.49	Sun 12/24	
Mon 12/25	Tue 12/26	Wed 12/27	Thu 12/28 434p-810p HRS 3.61	Fri 12/29 435p-1028p HRS 5.88	Sat 12/30 436p-750p HRS 3.23	Sun 12/31	
Mon 1/1	Tue 1/2	Wed 1/3	Thu 1/4	Fri 1/5	Sat 1/6 440p-1157p HRS 7.28	Sun 1/7	
Mon 1/8	Tue 1/9	Wed 1/10	Thu 1/11	Fri 1/12 430p-1155p HRS 7.42	Sat 1/13 441p-909p HRS 4.47	Sun 1/14	
Mon 1/15	Tue 1/16	Wed 1/17	Thu 1/18	Fri 1/19 435p-1134p HRS 6.99	Sat 1/20 436p-1109p HRS 6.56	Sun 1/21	
Mon 1/22	Tue 1/23	Wed 1/24	Thu 1/25	Fri 1/26	Sat 1/27 422p-805p HRS 3.73	Sun 1/28	
Mon 1/29	Tue 1/30	Wed 1/31	Thu 2/1	Fri 2/2 915a-1030a 439p-1135p HRS 8.17	Sat 2/3 439p-1139p HRS 7.01	Sun 2/4	
Mon 2/5	Tue 2/6	Wed 2/7	Thu 2/8	Fri 2/9 431p-1250a HRS 8.32	Sat 2/10 431p-1214a HRS 7.72	Sun 2/11	
Mon 2/12	Tue 2/13	Wed 2/14	Thu 2/15	Fri 2/16	Sat 2/17	Sun 2/18	
Mon 2/19	Tue 2/20	Wed 2/21	Thu 2/22	Fri 2/23	Sat 2/24	Sun 2/25	

	Mon 2/26	Tue 2/27	Wed 2/28	Thu 2/29			
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Category	Total Hrs
Regular	249.17
Overtime	1.23
Total	250.40

EXHIBIT II

Earnings - Current					Deductions / Taxes		
Date	Pay Description	Pay Rate	Hrs/Units	Pay Amount	Description	Amount	YTD
10-20-2023	REGULAR PAY	11.2500	33.53	377.22	MEDICARE	9.76	13.43
10-20-2023	OVERTIME	16.8750	0.23	3.88	SOC SECURITY	41.77	57.44
10-20-2023	TIPS	6.2900	33.76	212.35			
10-29-2023	TIPS	80.1100	1.00	80.11			

Gross Earnings \$381.10 TOTAL 68.52 673.56

Earnings - Year To Date		Net Pay Distribution	
Description	YTD Type	Amount	
REGULAR PAY	531.80 CHECK	\$0.00	
TIPS	301.98		
OVERTIME	12.49 DIRECT DEPOSIT	\$329.57	
TIPS	80.11		
	TOTAL NET PAY	\$329.57	
	TOTAL NET PAY YTD	\$473.42	
TOTAL	\$926.38		TOTAL 51.53 70.87

Paid Time Off		Direct Deposit Detail		Employer Contributions			
Description	Balance	Account	Type	Amount	Description	Amount	YTD
PAID TIME OFF	0.92		CHECKING	329.57			
			TOTAL DEPOSITED	\$329.57	TOTAL	0.00	0.00

PUTTER'S BAR & GRILL

 PUTTER'S BAR & GRILL
 3755 BREAKTHROUGH WAY
 LAS VEGAS, NV 89135

Check No. 00921972
 Pay Date 11-02-2023

Pay Non-negotiable \$0.00

To The **CHELSEA T RANDA**
 Order Of 

*** Non-Negotiable ***

PUTTER'S BAR & GRILL

 PUTTER'S BAR & GRILL
 3755 BREAKTHROUGH WAY
 LAS VEGAS, NV 89135

HORIZON

CHELSEA T RANDA


Earnings - Current					Deductions / Taxes		
Date	Pay Description	Pay Rate	Hrs/Units	Pay Amount	Description	Amount	YTD
11-16-2023	REGULAR PAY	11.2500	32.70	367.88	MEDICARE	11.60	34.86
11-16-2023	TIPS	6.2900	32.70	205.70	SOC SECURITY	49.60	149.05
11-26-2023	TIPS	226.5700	1.00	228.57			

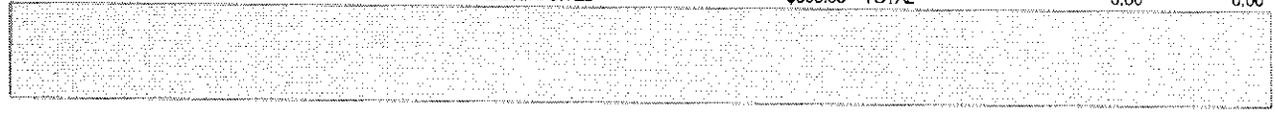
Gross Earnings \$367.88 TOTAL 66.40 800.15

Earnings - Year To Date		Net Pay Distribution	
Description	YTD Type	Description	Amount
REGULAR PAY	1334.28	CHECK	\$0.00
TIPS	750.66		
OVERTIME	12.49	DIRECT DEPOSIT	\$306.68
TIPS	306.68		
		TOTAL NET PAY	\$306.68
		TOTAL NET PAY YTD	\$1,162.86
TOTAL	\$2,404.11		

TOTAL 61.20 183.91

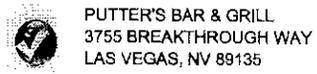
Paid Time Off		Direct Deposit Detail			Employer Contributions		
Description	Balance	Account	Type	Amount	Description	Amount	YTD
PAID TIME OFF	2.29		CHECKING	306.68			

TOTAL DEPOSITED \$306.68 TOTAL 0.00 0.00



PUTTER'S BAR & GRILL

Check No. 00925000
Pay Date 11-30-2023



PUTTER'S BAR & GRILL
3755 BREAKTHROUGH WAY
LAS VEGAS, NV 89135

Pay Non-negotiable

\$0.00

To The **CHELSEA T RANDA**
Order Of

*** *Non-Negotiable* ***

PUTTER'S BAR & GRILL



PUTTER'S BAR & GRILL
3755 BREAKTHROUGH WAY
LAS VEGAS, NV 89135

HORIZON

CHELSEA T RANDA

