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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JENNIFER ZIMMERMAN, on behalf of herself
and all other similarly situation,

Plaintiff,

vs.

BUDDHA ENTERTAINMENT, LLC d/b/a and
a/k/a TAO GROUP also d/b/a and a/k/a TAO
NIGHTCLUB also d/b/a and a/k/a TAO LV
NIGHTCLUB; ASIA LAS VEGAS, LLC, d/b/a
and a/k/a TAO ASIAN BISTRO; STRIP VIEW
ENTERTAINMENT, LLC d/b/a and a/k/a TAO
GROUP; DOES 1 through 50, inclusive,

Defendants.

Case No.:

**NOTICE TO FEDERAL COURT OF
REMOVAL OF CIVIL ACTION FROM
STATE COURT**

TO THE ABOVE-ENTITLED COURT:

Defendants Buddha Entertainment, LLC, Asia Las Vegas, LLC, and Strip View Entertainment, LLC (collectively, "Defendants") **GIVE NOTICE AND REMOVE** the above-entitled civil action ("Notice of Removal") from the Eighth Judicial District Court of Clark County, Nevada ("State Court") to the United States District Court for the District of Nevada pursuant to 28 U.S.C. §§ 1441 and 1446. As discussed below, this Notice of Removal is proper because it is timely and the action invokes diversity jurisdiction.

1. On July 11, 18, Plaintiff Jennifer Zimmerman ("Plaintiff") commenced a civil action in State Court entitled *Jennifer Zimmerman v. Buddha Entertainment, LLC, et al.*, Case No. A-18-777489-C in the Eighth Judicial District Court, Clark County, in the State of Nevada. A copy of the Complaint is attached as **Exhibit 1**. Defendants are the defendants in the above-entitled action.

1 2. On July 18, 2018, Plaintiff served Defendants with the State Court issued Summons
2 and Complaint. Copies of the affidavits of service are attached hereto as **Exhibit 2**.

3 3. No further proceedings have been had in this matter in the State Court.

4 4. This Notice of Removal is timely under 28 U.S.C. § 1446(b) because it has been
5 filed within thirty (30) days of July 18, 2018, the first date on which Defendants received any
6 pleadings setting forth the claims for relief upon which the civil action is based.

7 5. This action is a civil action of which this Court has original jurisdiction pursuant to
8 28 U.S.C. § 1332, diversity jurisdiction.

9 6. Plaintiff is a citizen of the State of Nevada. ¶ 4, Exhibit A.

10 7. Buddha Entertainment, LLC is limited liability company organized under the laws
11 of the State of Delaware with its principal place of business in New York, New York. **Exhibit 3**.

12 8. Asia Las Vegas, LLC is limited liability company organized under the laws of the
13 State of Delaware with its principal place of business in New York, New York. **Exhibit 3**.

14 9. Strip View Entertainment, LLC is limited liability company organized under the
15 laws of the State of Delaware with its principal place of business in New York, New York. **Exhibit**
16 **3**.

17 10. As such, there is now and there was at the time of the commencement of this action,
18 complete diversity between Plaintiff and Defendants.

19 11. Plaintiff's Complaint alleges four (4) causes of action including claims for failure to
20 pay minimum wages, overtime, and all wages due and owing, and injunctive relief. Plaintiff is
21 seeking damages in the form of payment of minimum wages and overtime, waiting time penalties,
22 attorney's fees and costs (which are expressly permitted by Nev. Const. Art. 15, Sec. 16(A), and
23 Nev. Rev. Stat. § 608.140), and punitive damages pursuant to N.R.S. 42.005 to punish Defendants.
24 Based on an analysis of the allegations in the Complaint, jury verdicts and settlements in cases
25 similar to the instant case, Plaintiff's potential jury award is likely in excess of \$150,000.00 when
26 general, special, and punitive damages are taken into account.
27
28

1 12. Therefore, this Court has original jurisdiction over the subject matter of this action
2 under the provisions of 28 U.S.C § 1332 in that there is complete diversity between the parties and
3 more than \$75,000 in controversy exclusive of interest and costs. Pursuant to 28 U.S.C § 1441,
4 Defendant is therefore entitled to remove this action to this Court.

5 13. A true and correct copy of this Notice of Removal is being filed this date with the
6 Clerk of the Eighth Judicial District Court of the State of Nevada.

7 Based on the foregoing, Defendants removes the above action now pending in the Eighth
8 Judicial District Court of the State of Nevada, as Case No. A-18-777489-C, to this Court. .

9 Dated this 7th day of August, 2018.

10
11 JACKSON LEWIS P.C.

12 /s/ Joshua A. Sliker

13 JOSHUA A. SLIKER, ESQ.

14 Nevada Bar No. 12493

15 3800 Howard Hughes Parkway, Suite 600

16 Las Vegas, Nevada 89169

17 *Attorneys for Defendants*
18
19
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21
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28

CERTIFICATE OF SERVICE

I hereby certify that I am an employee Jackson Lewis P.C. and that on this 7th day of August, 2018, I caused to be sent via electronic filing and electronic mail, a true and correct copy of the above and foregoing **NOTICE TO FEDERAL COURT OF REMOVAL OF CIVIL ACTION FROM STATE COURT** properly addressed to the following:

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/s/ Janine Martin
Employee of Jackson Lewis P.C.

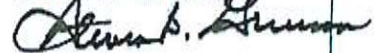
4829-6949-7182, v. 1

EXHIBIT 1

EXHIBIT 1

EXHIBIT 1

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7/11/2018 12:08 PM
Steven D. Grierson
CLERK OF THE COURT



COMP

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Attorneys for Plaintiff

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

JENNIFER ZIMMERMAN, on behalf of
herself and all others similarly situated;

Plaintiff,

vs.

BUDDHA ENTERTAINMENT, LLC d/b/a
and a/k/a TAO GROUP also d/b/a and
a/k/a TAO NIGHTCLUB also d/b/a and
a/k/a TAO LV NIGHTCLUB; ASIA LAS
VEGAS, LLC d/b/a and a/k/a TAO
GROUP also d/b/a and a/k/a TAO ASIAN
BISTRO; STRIP VIEW
ENTERTAINMENT LLC d/b/a and a/k/a
TAO GROUP also d/b/a and a/k/a LAVO
LAS VEGAS; DOES 1 through 50,
inclusive,

Defendants.

Case No. A-18-777489-C
Dept.:

Department 15

CLASS ACTION COMPLAINT

**Arbitration Exemption Claimed:
Class Action**

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

**LIEN REQUESTED PURSUANT TO
NRS 608.050**

JURY TRIAL DEMANDED

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1 CLASS ACTION COMPLAINT

2 COMES NOW Plaintiff Jennifer Zimmerman, on behalf of herself and all others
3 similarly situated and alleges the following:

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

8 JURISDICTION AND VENUE

9 1. This Court has original jurisdiction over the state law claims alleged herein
10 because the amount in controversy exceeds \$15,000 and a party seeking to recover
11 unpaid wages has a private right of action pursuant to the Nevada Constitution, Article 15
12 Section 16, and Nevada Revised Statute ("NRS") Chapter 608. See *Neville v. Terrible*
13 *Herbst, Inc.*, 133 Nev. Adv. Op. 95 (Dec. 7, 2017).

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

16 3. Venue is proper in this Court because the Defendants named herein
17 maintain a principal place of business or otherwise are found in this judicial district and
18 many of the acts complained of herein occurred in Clark County, Nevada.

19 PARTIES

20 4. Plaintiff Jennifer Zimmerman ("Plaintiff" or "Zimmerman") is a person who is
21 and was a resident of the State of Nevada and was employed by Defendants as a non-
22 exempt hourly employee from October 2016 to March 2018.

23 5. Defendant Buddha Entertainment, LLC d/b/a and a/k/a Buddha
24 Entertainment LLC also d/b/a and a/k/a Tao Nightclub also d/b/a and a/k/a Tao LV
25 Nightclub is a foreign limited-liability company registered with the Nevada Secretary of
26 State.

27 6. Defendant Asia Las Vegas, LLC d/b/a and a/k/a Tao Group also d/b/a and
28 a/k/a Tao Asian Bistro is a foreign limited-liability company registered with the Nevada

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1 Secretary of State.

2 7. Defendant Strip View Entertainment LLC d/b/a and a/k/a Tao Group also
3 d/b/a and a/k/a Lavo Las Vegas is a foreign limited-liability company registered with the
4 Nevada Secretary of State.

5 8. Defendant Buddha Entertainment, LLC holds the fictitious firm name for Tao
6 Nightclub with Clark County and was doing business in this Judicial District in Clark
7 County, Nevada where the subject incidences occurred.

8 9. Defendant Asia Las Vegas, LLC holds the fictitious firm name for Tao Asian
9 Bistro with Clark County and was doing business in this Judicial District in Clark County,
10 Nevada where the subject incidences occurred.

11 10. Defendant Strip View Entertainment LLC holds the fictitious firm name for
12 Lavo Las Vegas with Clark County and was doing business in this Judicial District in Clark
13 County, Nevada where the subject incidences occurred.

14 11. At all relevant times, each Defendant was an agent, employee, joint-
15 venturer, shareholder, director, member, co-conspirator, alter ego, master, or partner of
16 each of the other Defendants, and at all times mentioned herein were acting within the
17 scope and course and in pursuance of his, her, or its agency, joint venture, partnership,
18 employment, common enterprise, or actual or apparent authority in concert with each
19 other and the other Defendants.

20 12. Upon information and belief, Defendants represent to their employees that
21 ""Tao Group" includes Asia Las Vegas LLC (Tao Restaurant), Buddha Beach LLC, (Tao
22 Beach), Buddha Entertainment LLC (Tao Nightclub), Roofdeck Entertainment LLC
23 (Marque Nightclub & Dayclub), StripView Entertainment LLC (Lavo Restaurant), Guapo
24 Bodega Las Vegas LLC (Beauty & Essex Restaurant, and/or Five Chinese Brothers LLC."

25 13. Further, upon information and belief, Defendants represent to their
26 employees that these entities collectively are known as and/or are referred to as "the
27 Company."
28

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1 14. At all relevant times, the acts and omissions of Defendants concurred and
2 contributed to the various acts and omissions of each and every one of the other
3 Defendants in proximately causing the complaints, injuries, and damages alleged herein.
4 At all relevant times herein, Defendants approved of, condoned and/or otherwise ratified
5 each and every one of the acts or omissions complained of herein. At all relevant times
6 herein, Defendants aided and abetted the acts and omissions of each and every one of
7 the other Defendants thereby proximately causing the damages as herein alleged.

8 15. The Defendants named herein are the employers of the Plaintiff and all
9 Class Members alleged herein. The Defendants are employers engaged in commerce
10 under the provisions of NRS 608.011. The identity of DOES 1-50 is unknown at the time
11 and the Complaint will be amended at such time when the identities are known to Plaintiff.
12 Plaintiff is informed and believes that each Defendants sued herein as DOE is responsible
13 in some manner for the acts, omissions, or representations alleged herein and any
14 reference to "Defendant" or "Defendants" herein shall mean "Defendants and each of
15 them."

16 FACTUAL ALLEGATIONS

17 The Named-Plaintiff

18 16. Plaintiff Zimmerman was employed by Defendants as a bartender from
19 October 2016 to March 2018.

20 17. Plaintiff Zimmerman been classified as an hourly non-exempt employee of
21 Defendants who was supposedly paid an hourly rate of pay of \$7.25.

22 18. Plaintiff Zimmerman was scheduled for and worked at least 8 hour
23 workdays.

24 Defendants' Policy of Failing to Offer or Provide Health Insurance Benefits Less 25 Than 10% of Employees' Total Gross Income

26 19. Defendants maintain an unlawful payment practice of paying Plaintiff and
27 all other similarly situated employees less than the applicable minimum and overtime
28 wage rate because they unlawfully deducted tips from Plaintiff and putative class

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1 members' regular hourly rate of pay and paid the lower tier minimum rate even though
2 Defendants do not offer or provide insurance that is less than 10% of the total gross
3 income of Plaintiff and other similarly situated employees.

4 20. For instance, on the pay period ending March 18, 2018, (a true and correct
5 copy of Plaintiff's earnings record is attached hereto as Exhibit I) Defendants paid Plaintiff
6 Zimmerman a total gross taxable income of \$52.56 in minimum wages (\$52.56 in
7 minimum wages for 7.25 regular hours worked during the pay period). Tips are not
8 included in the calculation of an employee's total gross taxable income. See *MDC*
9 *Restaurants, LLC et al v. The Eighth Judicial Dist. Court*, 132 Nev. Op. 76 (Oct. 27, 2016).
10 During that same period of time (and indeed during her entire employment), Plaintiff
11 Zimmerman was not offered or provided with health benefits of less than the 10%
12 maximum percentage for an employer to qualify for the lower-tier minimum wage
13 payment. Accordingly, Defendants failed to compensate Plaintiff Zimmerman at the
14 correct legal higher-tier minimum wage rate of \$8.25 per non-overtime hour and \$12.38
15 per overtime hour worked. Defendants therefore underpaid Plaintiff Zimmerman \$7.25
16 during that pay period.

17 21. Also, on the pay period ending March 11, 2018, (a true and correct copy of
18 Plaintiff's earnings record is attached hereto as Exhibit II) Defendants paid Plaintiff
19 Zimmerman a total gross taxable income of \$153.19 in minimum wages (\$153.19 in
20 minimum wages for 21.13 regular hours worked during the pay period). Plaintiff
21 Zimmerman was not offered or provided with health benefits of less than the 10%
22 maximum percentage for an employer to qualify for the lower-tier minimum wage
23 payment. Accordingly, Defendants failed to compensate Plaintiff Zimmerman at the
24 correct legal higher-tier minimum wage rate of \$8.25 per non-overtime hour and \$12.38
25 per overtime hour worked. Defendants therefore underpaid Plaintiff Zimmerman \$21.13
26 during that pay period.

27 22. The policies and practices of Defendants at all relevant times have been
28 substantially similar, if not identical, for all employees. Defendants also purportedly paid

1 the lower-tier minimum wage rate to putative class members even though they did not
2 offer health insurance to employees at a cost of 10% or less than their gross earnings.

3 23. Defendants are legally required to maintain all itemized pay statements that
4 will demonstrate the amount of health insurance premiums paid by Plaintiff and all
5 putative class member and the resulting amount of wages underpaid to Plaintiff and all
6 members of the putative class during the entire period of time at issue in this case. Upon
7 information and belief, Defendants represent to their employees that "[t]he Company
8 keeps extremely detailed records of all employee earnings based upon credit card tips
9 and ALL cash sales."

10 **CLASS ACTION ALLEGATIONS**

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

13 25. Plaintiff brings this action on behalf of herself and all others similarly situated
14 employees as a class action under Rule 23 of the Nevada Rules of Civil Procedure.

15 26. The Classes are defined as follows:

16 A. **Minimum Wage Class:** "All hourly paid non-exempt persons
17 employed by Defendants who were paid less than \$8.25 per non-
18 overtime hour worked in the state of Nevada within 2 years from the
19 filing of this complaint until judgment."

20 B. **Overtime Class:** "All hourly paid non-exempt persons
21 employed by Defendants who were paid less than \$12.38 per
22 overtime hour worked in the state of Nevada within 3 years from the
23 filing of this complaint until judgment."

24 C. **Waiting Time Penalty Class:** "All members of the Minimum
25 Wage and/or Overtime Wage Classes who are former employees."

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

28 A. **The Classes are Sufficiently Numerous:** Upon information and belief,
Defendants employ, and have employed, in excess 200 Minimum Wage, Overtime, and
Waiting Time Penalty Class Members within the applicable time period. Because
Defendants are legally obligated to keep accurate payroll records, Plaintiff alleges that

1 Defendants' records will establish the members of these Classes as well as their
2 numerosity.

3 B. Plaintiff's Claims are Typical to Those of Fellow Class Members:

4 Each Class Member is and was subject to the same practices, plans, or policies as
5 Plaintiff: (1) Whether Defendants can meet their burden of demonstrating that Plaintiff
6 and Minimum Wage Class Members were only entitled to receive the lower tier minimum
7 wage rate; (2) Whether Defendants can meet their burden of demonstrating that Plaintiff
8 and Overtime Class Members were only entitled to receive the lower tier overtime wage
9 rate; (3) Whether Plaintiff and members of the Waiting Time Penalty Class are entitled to
10 waiting time penalties for the failure to pay them minimum, regular, and overtime wages
11 owed.

12 C. Common Questions of Law and Fact Exist: Common questions of
13 and fact exist and predominate as to Plaintiff and the Class Members, including, without
14 limitation: Whether Defendants offered health insurance to Plaintiff and Class Members
15 that was no more than 10% of employees' gross taxable income and whether Defendants
16 failed to pay the Waiting Time Penalty Class Members all their wages due and owing in
17 violation of NRS 608.020-050.

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

25 E. Predominance/Superior Mechanism: Class claims predominate and
26 a class action is superior to other available means for the fair and efficient adjudication
27 of this controversy. Each Class Member has been damaged and is entitled to recovery
28 by reason of Defendants' illegal policy and/or practice of failing to compensate their

1 employees in accordance with Nevada wage and hour law. The prosecution of individual
2 remedies by each Class Member will tend to establish inconsistent standards of conduct
3 for Defendants and result in the impairment of Class Members' rights and the disposition
4 of their interest through actions to which they were not parties.

5 **FIRST CAUSE OF ACTION**

6 **Failure to Pay Minimum Wages in Violation of the Nevada Constitution
(On Behalf of Plaintiff and the Minimum Wage Class Against Defendants)**

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

9 29. Article 15 Section 16 of the Nevada Constitution sets forth the requirements
10 the minimum wage requirements in the State of Nevada ("MWA"). The MWA sets forth a
11 two-tiered minimum wage, which were set at \$7.25 and \$8.25 for the relevant time period
12 covered in this action.

13 30. In order to pay the lower tier minimum wage amount, an employer must
14 offer health benefits to its employees and the dependents of the employees "at a total
15 cost to the employee for premiums of not more than 10 percent of the employee's gross
16 taxable income from the employer."

17 31. As alleged herein, Defendants paid Plaintiff and all other members of the
18 Class at the lower-tier minimum wage rate but have failed to offer health benefits to their
19 employees and the employees' dependents at a total cost to the employee for premiums
20 of not more than 10% of the employees' gross taxable income.

21 32. As further alleged herein, Defendants unlawfully credited the tips received
22 by Plaintiff from the hourly wages owed to her.

23 33. By unlawfully paying Plaintiff and members of the Class less than the
24 applicable minimum wage rate of \$8.25 and further by crediting the tips received by
25 Plaintiff and the class from the hourly wages owed to them, Defendants have failed to
26 compensate Plaintiff and members of the Class at the minimum wage rate for all the hours
27 that they worked pursuant to the Nevada Constitution.

28 34. Wherefore, Plaintiff demands for herself and for all other Class Members

1 that Defendants pay Plaintiff and Class Members their unpaid minimum wages for all
2 hours worked during the relevant time period alleged herein together with attorneys' fees,
3 costs, interest, and punitive damages, as provided by law.

4 **SECOND CAUSE OF ACTION**

5 **Failure to Pay Overtime Wages in Violation of NRS 608.018 and 608.140**
6 **(On Behalf of Plaintiff and the Overtime Class Against Defendants)**

7 35. Plaintiff realleges and incorporates by this reference all the paragraphs
8 above in this Complaint as though fully set forth herein.

9 36. NRS 608.140 provides that an employee has a private right of action for
10 unpaid wages.

11 37. NRS 608.018(1) provides as follows:

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

20 38. NRS 608.018(2) provides as follows:

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

26 39. As alleged herein, Defendants paid Plaintiff and all other members of the
27 Class at the lower-tier minimum wage rate but have failed to offer health benefits to their
28 employees and the employees' dependents at a total cost to the employee for premiums
of not more than 10% of the employees' gross taxable income.

40. By unlawfully paying Plaintiff and members of the Overtime Class less than
the higher-tier minimum wage rate of \$8.25 (with an overtime wage rate of \$12.38),
Defendants have likewise failed to compensate Plaintiff and members of the Class at the
correct overtime wage rate for all the overtime hours that they worked pursuant to NRS
608.018.

THIRD CAUSE OF ACTION

1 timely remit all wages due and owing to Plaintiff and the Waiting Time Penalty Class
2 Members.

3 48. Defendants willfully refuse and continue to refuse to pay Plaintiff and
4 Waiting Time Penalty Class Members all the wages that were due and owing upon the
5 termination of their employment.

6 49. Wherefore, Plaintiff and the Waiting Time Penalty Class Members demand
7 thirty (30) days of pay as waiting penalties under NRS 608.040 and 608.140, and thirty
8 (30) days of pay as waiting penalties under NRS 608.050 and 608.140, together with
9 attorneys' fees, costs, and interest, as provided by law.

10 **FOURTH CAUSE OF ACTION**

11 **Injunctive/Declaratory Relief**

12 **(On Behalf of Plaintiff, Minimum Wage Class, and the Overtime Class Against Defendants)**

13 50. Plaintiff realleges and incorporates by this reference all the paragraphs
14 above in this Complaint as though fully set forth herein.

15 51. As Defendants have paid Plaintiff and all other members of the Minimum
16 Wage Class at a rate lower than the higher-tier minimum wage rate but have failed to
17 offer health benefits to their employees and the employees' dependents at a total cost to
18 the employee for premiums of not more than 10% of the employees' gross taxable
19 income, Defendants have wrongfully withheld wages properly-owed to the Plaintiff and
20 the Minimum Wage Class Members.

21 52. Further, as Defendants have unlawfully credited the tips received by Plaintiff
22 and others similarly situated from the hourly wages owed to them, Defendants have
23 wrongfully withheld wages properly-owed to the Plaintiff and the Minimum Wage Class
24 Members.

25 53. As Defendants have likewise failed to compensate Plaintiff and members of
26 the Overtime Class at the correct overtime wage rate for all the overtime hours that they
27 worked pursuant to NRS 608.018, Defendants have wrongfully withheld wages properly-
28 owed to the Plaintiff and the Overtime Class Members.

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- 1 608.018 and 608.140 for all hours worked over 8 hours per day and/or over
- 2 40 hours in a workweek;
- 3 5. For waiting time penalties pursuant to NRS 608.040-.050 and 608.140;
- 4 6. For a lien on the property where Plaintiff and all Class Members labored
- 5 pursuant to NRS 608.050;
- 6 7. For injunctive relief;
- 7 8. For declaratory relief;
- 8 9. For interest as provided by law at the maximum legal rate;
- 9 10. For punitive damages;
- 10 11. For reasonable attorneys' fees authorized by statute;
- 11 12. For costs of suit incurred herein;
- 12 13. For pre-judgment and post-judgment interest, as provided by law; and,
- 13 14. For such other and further relief as the Court may deem just and proper.

14 DATED: July 11, 2018

GABROY LAW OFFICES

15 By: 

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7287 Lakeside Drive
Reno, Nevada 89511

EXHIBIT I

道TAO TAO TAO LAVO MARQUEE
NIGHTCLUB BEACH NIGHTCLUB & DAYCLUB

REYES, DIANA
TAO LV

Home Help Logout

BUDDHA ENTERTAINMENT LLC
1350 AVENUE OF THE AMERICAS
NEW YORK, NY 10019
PAY ZERO

CITIBANK (NEVADA) N.A.
8701 W SAHARA
LAS VEGAS, NV 89117-1814
Check Date 3/23/2018
Check No 202057848

TO THE

ORDER OF JENNIFER L. ZIMMERMAN
202 LINE/350A BAR/
350A BAR
ZIMMERMANJENNIFER

PAY THIS AMOUNT \$0.00

NON-NEGOTIABLE

Employee File Number Employee Name Check No Company Name & Address
JENNIFER L. ZIMMERMAN 202057848 BUDDHA ENTERTAINMENT LLC
1350 AVENUE OF THE AMERICAS
NEW YORK NY 10019
Check Number 40751

Company TRG VEGAS Division Number 202 LINE Department Number 350A BAR

Social Security Number Period Start 3/12/2018 Period Ending 3/18/2018 Check Date 3/23/2018

PW= S 0
ST= 0

Earnings					Taxes			Deductions		
Description	Hours	Rate	Amount	YTD	Description	Amount	YTD	Description	Amount	YTD
REGULAR	5.17	\$7,250	\$377.48	\$1,360.41	SSLC	\$29.82	\$600.23			
% OT	0.00	\$0.000	\$0.00	\$20.94	FICA	16.98	\$154.53			
MEAL	1.00	\$0.300	(\$0.70)	(\$23.10)	PWT	\$19.00	\$710.29			
TRAIL	2.00	\$7,250	\$15.00	\$167.55						
MEMO:										
TOTALTPTD 0.00 \$0.000 \$429.13 \$9,131.18					PWT, H 130.46		\$676.34			
EARNINGS		\$51.85	TAXES		\$51.85	DEDUCTIONS		\$0.00	NET PAY \$0.00	

Back to Paycheck History

EXHIBIT II

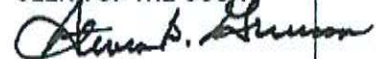
<div style="display: flex; justify-content: space-between;"> 道TAO TAO TAO LAVO MARQUEE REYES, DIANA TAO LV </div> <div style="display: flex; justify-content: space-between;"> NOTICE BEACH NIGHTCLUB & DAYCLUB </div>																																																																																																												
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BUDDHA ENTERTAINMENT LLC 1350 AVENUE OF THE AMERICAS NEW YORK, NY 10019 PAY ZERO			CITIBANK (NEVADA) N.A. 8701 W SAHARA LAS VEGAS, NV 89117-1814 Check Date 3/16/2018				Check No 202057636																																																																																																					
TO THE																																																																																																												
ORDER OF			JENNIFER L ZIMMERMAN				PAY THIS AMOUNT \$0.00																																																																																																					
			202 LINE/350A BAR/ 350A BAR ZIMMERMANJENNIFER																																																																																																									
NON-NEGOTIABLE XXXXXXXXXXXXXXX																																																																																																												
Employee Fdn Number		Employee Name		Check No		Company Name & Address																																																																																																						
		JENNIFER L ZIMMERMAN		202057636		BUDDHA ENTERTAINMENT LLC 1350 AVENUE OF THE AMERICAS NEW YORK NY 10019 Check Number 49751																																																																																																						
Company TRG VEGAS		Division Number 201 LINE		Department Number 350A BAR																																																																																																								
Social Security Number		Period Ending		Check Date																																																																																																								
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ET= 0																																																																																																												
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="5">Earnings</th> <th colspan="3">Taxes</th> <th colspan="2">Deductions</th> </tr> <tr> <th>Description</th> <th>Hours</th> <th>Rate</th> <th>Amount</th> <th>YTD</th> <th>Description</th> <th>Amount</th> <th>YTD</th> <th>Description</th> <th>Amount</th> <th>YTD</th> </tr> </thead> <tbody> <tr> <td>REGULAR</td> <td>19.03</td> <td>\$7.250</td> <td>\$138.11</td> <td>\$1,322.93</td> <td>SSIC</td> <td>\$73.53</td> <td>\$630.51</td> <td></td> <td></td> <td></td> </tr> <tr> <td>OT</td> <td>0.00</td> <td>\$3.000</td> <td>\$0.00</td> <td>\$20.94</td> <td>HEOI</td> <td>\$17.20</td> <td>\$147.55</td> <td></td> <td></td> <td></td> </tr> <tr> <td>HEAL3</td> <td>3.00</td> <td>\$5.700</td> <td>(\$2.10)</td> <td>(\$22.40)</td> <td>PRT</td> <td>\$60.36</td> <td>\$495.19</td> <td></td> <td></td> <td></td> </tr> <tr> <td>TRAIL1</td> <td>2.08</td> <td>\$7.250</td> <td>\$15.00</td> <td>\$152.47</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td colspan="11" style="text-align: center;">MEMO:</td> </tr> <tr> <td>TOTALTYPD</td> <td>0.00</td> <td>\$0.000</td> <td>\$1,034.04</td> <td>\$5,703.05</td> <td>PWT N</td> <td>\$106.93</td> <td>\$645.00</td> <td></td> <td></td> <td></td> </tr> <tr> <td>EARNINGS</td> <td></td> <td>\$151.09</td> <td></td> <td></td> <td>TAXES</td> <td></td> <td>\$151.09</td> <td>DEDUCTIONS</td> <td>\$0.00</td> <td>NET PAY</td> <td>\$0.00</td> </tr> </tbody> </table>										Earnings					Taxes			Deductions		Description	Hours	Rate	Amount	YTD	Description	Amount	YTD	Description	Amount	YTD	REGULAR	19.03	\$7.250	\$138.11	\$1,322.93	SSIC	\$73.53	\$630.51				OT	0.00	\$3.000	\$0.00	\$20.94	HEOI	\$17.20	\$147.55				HEAL3	3.00	\$5.700	(\$2.10)	(\$22.40)	PRT	\$60.36	\$495.19				TRAIL1	2.08	\$7.250	\$15.00	\$152.47							MEMO:											TOTALTYPD	0.00	\$0.000	\$1,034.04	\$5,703.05	PWT N	\$106.93	\$645.00				EARNINGS		\$151.09			TAXES		\$151.09	DEDUCTIONS	\$0.00	NET PAY	\$0.00
Earnings					Taxes			Deductions																																																																																																				
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EARNINGS		\$151.09			TAXES		\$151.09	DEDUCTIONS	\$0.00	NET PAY	\$0.00																																																																																																	
Back to Paycheck History																																																																																																												

EXHIBIT 2

EXHIBIT 2

EXHIBIT 2

Electronically Filed
7/26/2018 3:30 PM
Steven D. Grierson
CLERK OF THE COURT



1 **NOTC**

2 Christian Gabroy, Nev. Bar No. 8805
3 christian@gabroy.com
4 Kaine Messer, Nev. Bar. No. 14240
5 kmesser@gabroy.com
6 GABROY LAW OFFICES
7 170 S. Green Valley Pkwy, Suite 280
8 Henderson, NV 89012
9 Tel. (702) 259-7777
10 Fax. (702) 259-7704
11 *Attorneys for Plaintiff*

7 **DISTRICT COURT**

8 **CLARK COUNTY, NEVADA**

9 JENNIFER ZIMMERMAN, on behalf of
10 herself and all others similarly situated;

Case No. A-18-777489-C
Dept. No. XV

11 Plaintiff,

12 vs.

NOTICE OF AFFIDAVIT OF SERVICE

13 BUDDHA ENTERTAINMENT, LLC d/b/a
14 and a/k/a TAO GROUP also d/b/a and
15 a/k/a TAO NIGHTCLUB also d/b/a and
16 a/k/a TAO LV NIGHTCLUB; ASIA LAS
17 VEGAS, LLC d/b/a and a/k/a TAO
18 GROUP also d/b/a and a/k/a TAO ASIAN
19 BISTRO; STRIP VIEW
20 ENTERTAINMENT LLC d/b/a and a/k/a
21 TAO GROUP also d/b/a and a/k/a LAVO
22 LAS VEGAS; DOES 1 through 50,
23 inclusive,

24 Defendants.

21 **NOTICE OF AFFIDAVIT OF SERVICE**

22 COMES NOW Plaintiff Jennifer Zimmerman ("Plaintiff" or "Zimmerman") by and
23 through her attorneys of record, Christian Gabroy, Esq. and Kaine Messer, Esq. of
24 Gabroy Law Offices, and hereby Notices the Affidavit of Service upon Defendant Strip
25 View Entertainment, LLC, Inc. (see *Exhibit I*), Defendant Asia Las Vegas, LLC (see
26 *Exhibit II*) and Defendant Buddha Entertainment, LLC (see *Exhibit III*).

1 DATED this 26th day of July 2018.

2
3 RESPECTFULLY SUBMITTED,

4 GABROY LAW OFFICES

5
6 By /s/ Christian Gabroy
7 Christian Gabroy (#8805)
8 Kaine Messer (#14240)
9 The District at Green Valley Ranch
10 170 South Green Valley Parkway, Suite 280
11 Henderson, Nevada 89012
12 Tel (702) 259-7777
13 Fax (702) 259-7704
14 *Attorneys for Plaintiff*
15
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20
21
22
23
24
25
26
27
28

GABROY LAW OFFICES
170 S. Green Valley Pkwy., Suite 280
Henderson, Nevada 89012
(702) 259-7777 FAX: (702) 259-7704

EXHIBIT I

AFFIDAVIT OF SERVICE

EIGHTH JUDICIAL DISTRICT COURT FOR THE STATE OF NEVADA
CLARK COUNTY, STATE OF NEVADA

Jennifer Zimmerman, on behalf of herself and all others
similarly situated,

Plaintiff(s)

v.

Buddha Entertainment, LLC d/b/a and a/k/a TAO Group
also d/b/a and a/k/a Tao Nightclub; et al.,

Defendant(s)

Case No.:A-18-777489-C
Christian J. Gabroy, Esq. Bar No. 8805
GABROY LAW OFFICES
170 S. Green Valley Parkway, Suite 280
Henderson, NV 89012
(702) 259-7777
Attorneys for the Plaintiff
Client File# Jennifer Zimmerman

I, Judith Mae All, being sworn, states: That I am a licensed process server registered in Nevada. I received a copy of the Summons: Class Action Complaint, from GABROY LAW OFFICES

That on 7/18/2018 at 2:08 PM I served the above listed documents to Strip View Entertainment, LLC., c/o CSC Services Of Nevada, Inc., Registered Agent by personally delivering and leaving a copy at 2215-B Renaissance Drive, Las Vegas, NV 89119 with Frances Gutierrez - Customer Service Specialist, a person of suitable age and discretion, authorized by Registered Agent to accept service of process at the above address shown on the current certificate of designation filed with the Secretary of State.

That the description of the person actually served is as follows:

Gender: Female, Race: Hispanic, Age: 30's, Height: Seated, Weight: 120, Hair: Black, Eyes: Brown

I being duly sworn, states: that all times herein, Affiant was and is over 18 years of age, not a party to or interested in the proceedings in which this Affidavit is made. I declare under perjury that the foregoing is true and correct.

Date: 7/25/18

Judith Mae All
Registered Work Card# R-040570
State of Nevada

(No Notary Per NRS 53.045)

Service Provided for:
Nationwide Legal Nevada, LLC
626 S. 7th Street
Las Vegas, NV 89101
(702) 385-5444
Nevada Lic # 1656



EXHIBIT II

AFFIDAVIT OF SERVICE

CLARK COUNTY DISTRICT COURT
CLARK COUNTY, STATE OF NEVADA

Jennifer Zimmerman, on behalf of herself and all others
similarly situated,

Plaintiff(s)

v.

Buddha Entertainment, LLC d/b/a and a/k/a TAO Group
also d/b/a and a/k/a Tao Nightclub; et al.,

Defendant(s)

Case No.: A-18-777489-C
Christian J. Gabroy, Esq. Bar No. 8805
GABROY LAW OFFICES
170 S. Green Valley Parkway, Suite 280
Henderson, NV 89012
(702) 259-7777

Attorneys for the Plaintiff

Client File# Zimmerman

I, Judith Mae All, being sworn, states: That I am a licensed process server registered in Nevada. I received a copy of the Summons; Complaint, from GABROY LAW OFFICES

That on 7/18/2018 at 2:08 PM I served the above listed documents to Asia Las Vegas, LLC., c/o CSC Services Of Nevada, Inc., Registered Agent by personally delivering and leaving a copy at 2215- B Renaissance Drive, Las Vegas, NV 89119 with Frances Gutierrez - Customer Service Specialist, a person of suitable age and discretion, authorized by Registered Agent to accept service of process at the above address shown on the current certificate of designation filed with the Secretary of State.

That the description of the person actually served is as follows:

Gender: Female. Race: Hispanic. Age: 31 - 35, Height: Seated, Weight: 120-140. Hair: Black. Eyes: Brown

I being duly sworn, states: that all times herein, Affiant was and is over 18 years of age, not a party to or interested in the proceedings in which this Affidavit is made. I declare under perjury that the foregoing is true and correct.

Date: 7/25/18

Judith Mae All
Judith Mae All
Registered Work Card# R-040570
State of Nevada

(No Notary Per NRS 53.045)

Service Provided for:
Nationwide Legal Nevada, LLC
626 S. 7th Street
Las Vegas, NV 89101
(702) 385-5444
Nevada Lic # 1656



EXHIBIT III

AFFIDAVIT OF SERVICE

EIGHTH JUDICIAL DISTRICT COURT, FAMILY DIVISION, NEVADA
CLARK COUNTY, STATE OF NEVADA

Jennifer Zimmerman, on behalf of herself and all others
similarly situated,

Plaintiff(s)

v.

Buddha Entertainment, LLC d/b/a and a/k/a TAO Group
also d/b/a and a/k/a Tao Nightclub; et al.,

Defendant(s)

Case No.: A-18-777489-C
Christian J. Gabroy, Esq. Bar No. 8805
GABROY LAW OFFICES
170 S. Green Valley Parkway, Suite 280
Henderson, NV 89012
(702) 259-7777
Attorneys for the Plaintiff
Client File# Zimmerman

I, Judith Mae All, being sworn, states: That I am a licensed process server registered in Nevada. I received a copy of the Summons; Complaint, from GABROY LAW OFFICES

That on 7/18/2018 at 2:08 PM I served the above listed documents to Buddha Entertainment, LLC, c/o CSC Services Of Nevada, Inc., Registered Agent by personally delivering and leaving a copy at 2215- B Renaissance Drive, Las Vegas, NV 89119 with Frances Gutierrez - Customer Service Specialist, a person of suitable age and discretion, authorized by Registered Agent to accept service of process at the above address shown on the current certificate of designation filed with the Secretary of State.

That the description of the person actually served is as follows:

Gender: Female, Race: Hispanic, Age: 30's, Height: Seated, Weight: 120, Hair: Black, Eyes: Brown

I being duly sworn, states: that all times herein, Affiant was and is over 18 years of age, not a party to or interested in the proceedings in which this Affidavit is made. I declare under perjury that the foregoing is true and correct.

Date: 7/26/18

Judith Mae All
Registered Work Card# R-040570
State of Nevada

(No Notary Per NRS 53.045)

Service Provided for:
Nationwide Legal Nevada, LLC
626 S. 7th Street
Las Vegas, NV 89101
(702) 385-5444
Nevada Lic # 1656



EXHIBIT 3

EXHIBIT 3

EXHIBIT 3

BUDDHA ENTERTAINMENT, LLC

Business Entity Information

Status:	Active	File Date:	3/21/2005
Type:	Foreign Limited-Liability Company	Entity Number:	E0129702005-7
Qualifying State:	DE	List of Officers Due:	3/31/2019
Managed By:		Expiration Date:	
NV Business ID:	NV20051130595	Business License Exp:	3/31/2019

Additional Information

Central Index Key:	
--------------------	--

Registered Agent Information

Name:	CSC SERVICES OF NEVADA, INC.	Address 1:	2215-B RENAISSANCE DR
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89119
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	NV
Mailing Zip Code:			
Agent Type:	Commercial Registered Agent - Corporation		
Jurisdiction:	NEVADA	Status:	Active

Financial Information

No Par Share Count:	0	Capital Amount:	\$ 0
No stock records found for this company			

— Officers

☐ Include Inactive Officers

Managing Member - TAO GROUP OPERATING LLC

Address 1:	1350 AVENUE OF THE AMERICAS, SUITE 710	Address 2:	
City:	NEW YORK	State:	NY
Zip Code:	10019	Country:	
Status:	Active	Email:	

— Actions\Amendments

Action Type:	Application for Foreign Registration		
Document Number:	20050071854-32	# of Pages:	2
File Date:	3/21/2005	Effective Date:	
(No notes for this action)			

Action Type:	Initial List		
Document Number:	20050163726-32	# of Pages:	1
File Date:	5/2/2005	Effective Date:	
(No notes for this action)			
Action Type:	Amended List		
Document Number:	20050206148-58	# of Pages:	1
File Date:	6/2/2005	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20060153370-47	# of Pages:	1
File Date:	3/10/2006	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20070173068-14	# of Pages:	1
File Date:	3/12/2007	Effective Date:	
(No notes for this action)			
Action Type:	Registered Agent Address Change		
Document Number:	20070228894-82	# of Pages:	8
File Date:	4/2/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20080080605-79	# of Pages:	1
File Date:	2/4/2008	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20090186063-75	# of Pages:	1
File Date:	2/26/2009	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20100105404-37	# of Pages:	1
File Date:	2/19/2010	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20110122946-68	# of Pages:	1
File Date:	2/17/2011	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20120073371-86	# of Pages:	1
File Date:	1/31/2012	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20130173122-12	# of Pages:	1

File Date:	3/14/2013	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20140211983-61	# of Pages:	1
File Date:	3/24/2014	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20150121389-72	# of Pages:	1
File Date:	3/18/2015	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20160070796-38	# of Pages:	1
File Date:	2/17/2016	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20170045799-54	# of Pages:	1
File Date:	1/31/2017	Effective Date:	
(No notes for this action)			
Action Type:	Registered Agent Change		
Document Number:	20170304517-50	# of Pages:	1
File Date:	7/14/2017	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20180088693-05	# of Pages:	1
File Date:	2/27/2018	Effective Date:	
(No notes for this action)			

STRIP VIEW ENTERTAINMENT LLC

Business Entity Information

Status:	Active	File Date:	2/14/2008
Type:	Foreign Limited-Liability Company	Entity Number:	E0096742008-4
Qualifying State:	DE	List of Officers Due:	2/28/2019
Managed By:		Expiration Date:	
NV Business ID:	NV20081017233	Business License Exp:	2/28/2019

Additional Information

Central Index Key:	
--------------------	--

Registered Agent Information

Name:	CSC SERVICES OF NEVADA, INC.	Address 1:	2215-B RENAISSANCE DR
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89119
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	NV
Mailing Zip Code:			
Agent Type:	Commercial Registered Agent - Corporation		
Jurisdiction:	NEVADA	Status:	Active

Financial Information

No Par Share Count:	0	Capital Amount:	\$ 0
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No stock records found for this company



Officers

☐ Include Inactive Officers

Managing Member - TAO OPERATING GROUP LLC

Address 1:	1350 AVENUE OF THE AMERICAS, SUITE 710	Address 2:	
City:	NEW YORK	State:	NY
Zip Code:	10019	Country:	
Status:	Active	Email:	



Actions\Amendments

Action Type:	Application for Foreign Registration		
Document Number:	20080106020-69	# of Pages:	1
File Date:	2/14/2008	Effective Date:	
(No notes for this action)			

Action Type:	Initial List		
Document Number:	20080108036-88	# of Pages:	1
File Date:	2/15/2008	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20090155678-53	# of Pages:	1
File Date:	2/19/2009	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20090915277-22	# of Pages:	1
File Date:	12/29/2009	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20110177124-76	# of Pages:	1
File Date:	3/9/2011	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20120154356-19	# of Pages:	1
File Date:	3/2/2012	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20130117394-11	# of Pages:	1
File Date:	2/21/2013	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20140142345-76	# of Pages:	1
File Date:	2/26/2014	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20150065464-93	# of Pages:	1
File Date:	2/12/2015	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20160004068-37	# of Pages:	1
File Date:	1/5/2016	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20170022765-72	# of Pages:	1
File Date:	1/18/2017	Effective Date:	
(No notes for this action)			
Action Type:	Registered Agent Change		
Document Number:	20170304520-04	# of Pages:	1

File Date:	7/14/2017	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20180058693-72	# of Pages:	1
File Date:	2/6/2018	Effective Date:	
(No notes for this action)			

ASIA LAS VEGAS, LLC

Business Entity Information

Status:	Active	File Date:	3/21/2005
Type:	Foreign Limited-Liability Company	Entity Number:	E0129592005-2
Qualifying State:	DE	List of Officers Due:	3/31/2019
Managed By:		Expiration Date:	
NV Business ID:	NV20051129710	Business License Exp:	3/31/2019

Additional Information

Central Index Key:	
--------------------	--

Registered Agent Information

Name:	CSC SERVICES OF NEVADA, INC.	Address 1:	2215-B RENAISSANCE DR
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89119
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	NV
Mailing Zip Code:			
Agent Type:	Commercial Registered Agent - Corporation		
Jurisdiction:	NEVADA	Status:	Active

Financial Information

No Par Share Count:	0	Capital Amount:	\$ 0
---------------------	---	-----------------	------

No stock records found for this company

— Officers

☐ Include Inactive Officers

Managing Member - TAO GROUP OPERATING LLC

Address 1:	1350 AVENUE OF THE AMERICAS, SUITE 710	Address 2:	
City:	NEW YORK	State:	NY
Zip Code:	10019	Country:	
Status:	Active	Email:	

— Actions\Amendments

Action Type:	Application for Foreign Registration		
Document Number:	20050071826-91	# of Pages:	2
File Date:	3/21/2005	Effective Date:	
(No notes for this action)			

Action Type:	Initial List		
Document Number:	20050163729-65	# of Pages:	1
File Date:	5/2/2005	Effective Date:	
(No notes for this action)			
Action Type:	Amended List		
Document Number:	20050206145-25	# of Pages:	1
File Date:	6/2/2005	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20060153388-46	# of Pages:	1
File Date:	3/10/2006	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20070179333-55	# of Pages:	1
File Date:	3/14/2007	Effective Date:	
(No notes for this action)			
Action Type:	Registered Agent Address Change		
Document Number:	20070228894-82	# of Pages:	8
File Date:	4/2/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20080080604-68	# of Pages:	1
File Date:	2/4/2008	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20090307889-36	# of Pages:	1
File Date:	3/31/2009	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20090886577-22	# of Pages:	1
File Date:	1/10/2010	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20110122784-08	# of Pages:	1
File Date:	2/17/2011	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20120073460-65	# of Pages:	1
File Date:	1/31/2012	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20130207441-04	# of Pages:	1

File Date:	3/28/2013	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20140212051-18	# of Pages:	1
File Date:	3/24/2014	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20150121401-47	# of Pages:	1
File Date:	3/18/2015	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20160071741-09	# of Pages:	1
File Date:	2/17/2016	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20170045785-99	# of Pages:	1
File Date:	1/31/2017	Effective Date:	
(No notes for this action)			
Action Type:	Registered Agent Change		
Document Number:	20170304515-38	# of Pages:	1
File Date:	7/14/2017	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20180088684-95	# of Pages:	1
File Date:	2/27/2018	Effective Date:	
(No notes for this action)			