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12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 ANGELA WILLIAMS; JANE DOE #1;
JANE DOE #2;

15 Plaintiffs,

16 v.

17 STEVE SISOLAK, Governor of Nevada, in
18 his official capacity; AARON FORD,
Attorney General of Nevada, in his official
19 capacity; THE CITY OF LAS VEGAS;
CLARK COUNTY; NYE COUNTY;
20 WESTERN BEST, INC. D/B/A CHICKEN
RANCH; WESTERN BEST LLC; JAMAL
21 RASHID; MALLY MALL MUSIC, LLC;
FUTURE MUSIC, LLC; PF SOCIAL MEDIA
22 MANAGEMENT, LLC; E.P. SANCTUARY;
BLU MAGIC MUSIC, LLC; EXCLUSIVE
23 BEAUTY LOUNGE, LLC; FIRST

Case No. 2:21-cv-01676

**FIRST AMENDED COMPLAINT
FOR DECLARATORY AND
INJUNCTIVE RELIEF**

JURY TRIAL DEMANDED

24

1 INVESTMENT PROPERTY LLC; V.I.P.
2 ENTERTAINMENT, LLC; MP3
3 PRODUCTIONS, INC.; MMM
4 PRODUCTIONS, INC.; SHAC, LLC D/B/A
5 SAPPHIRE GENTLEMAN'S CLUB
6 AND/OR SAPPHIRE; SHAC MT, LLC; and
7 LAS VEGAS BISTRO, LLC D/B/A LARRY
8 FLYNT'S HUSTLER CLUB;

9 Defendants.

10 COMPLAINT

11 INTRODUCTION

12 1. It is axiomatic that the right to be free from slavery is among the most basic of
13 human rights: uncontested in international law, and enshrined in the United States Constitution
14 at significant cost.

15 2. Yet it is a right numerous women and girls are denied in Nevada, where they
16 are bought and sold in a glamorized, lucrative monument to male sexual entitlement: the state's
17 prostitution industrial complex.

18 3. Nevada has cooperated with the City of Las Vegas, Clark County, Nye County,
19 Western Best, Inc. d/b/a Chicken Ranch, Western Best LLC, Jamal Rashid; Mally Mall Music,
20 LLC, Future Music, LLC, PF Social Media Management, LLC, E.P. Sanctuary, Blu Magic
21 Music, LLC, Exclusive Beauty Lounge, LLC, First Investment Property LLC, V.I.P.
22 Entertainment, LLC; MP3 Productions, Inc., MMM Productions, Inc. SHAC, LLC d/b/a
23 Sapphire Gentlemen's Club and/or Sapphire, SHAC MT, LLC, and Las Vegas Bistro, LLC
24 d/b/a Larry Flynt's Hustler Club to maintain and profit from a legalized system of prostitution
– explicit in certain counties, and de facto elsewhere.

4. Plaintiffs Angela Williams, Jane Doe #1, and Jane Doe #2 were sex trafficked

1 due to that system of legalized prostitution, that is, they were induced to engage in commercial
2 sex acts through force, fraud, and coercion – including psychological manipulation and debt
3 bondage – in legal strip clubs, legal escort businesses, and a legal brothel operating in Nevada.

4 5. The collusion of the State of Nevada, its political subdivisions, and private
5 businesses in the sex trade, which have in turn failed to enforce or violated state and federal
6 laws against prostitution, prostitution advertising, debt bondage, and sex trafficking, has
7 allowed sex traffickers to operate in Nevada with impunity.

8 6. As victims of sex trafficking, Plaintiffs were diminished to a status in which
9 their sex traffickers and buyers exercised powers of ownership over them—that is, a condition
10 of slavery.

11 7. Under the Thirteenth Amendment, states cannot create conditions that allow
12 slavery or involuntary servitude to flourish, including in the form of sex trafficking. By
13 providing legal cover for the sex trade, that is precisely what Nevada has done.

14 8. Additionally, neither states nor private parties may perpetrate or benefit from
15 slavery under the Trafficking Victims Protection Act, yet the Defendants have done so –
16 through direct revenues, taxes, and licensing fees.

17 9. Because Defendants have facilitated and profited from sex trafficking, violating
18 the Thirteenth Amendment’s ban on slavery and involuntary servitude, and the Trafficking
19 Victims Protection Act, Plaintiffs now seek to hold them accountable for these human rights
20 violations.

21 **JURISDICTION AND VENUE**

22 10. This civil rights action raises federal questions under the Thirteenth
23 Amendment to the United States Constitution, and the Trafficking Victims Protection
24

1 Reauthorization Act, 18 U.S.C. §§ 1591–95.

2 11. This Court has original jurisdiction over these federal claims under 28 U.S.C.
3 §§ 1331 and 1343.

4 12. This Court has authority to award the requested damages under 28 U.S.C. §
5 1343; the requested declaratory relief under 28 U.S.C. §§ 2201–02; the requested injunctive
6 relief under 28 U.S.C. § 1343 and Fed. R. Civ. P. 65; and costs and attorneys’ fees under 42
7 U.S.C. § 1988.

8 13. This Court has supplemental jurisdiction over the state law claims made herein
9 pursuant to 28 U.S.C. § 1367.

10 14. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b), because
11 Defendants reside in this district and division and/or all of the acts described in this Complaint
12 occurred in this district.

13 **PARTIES**

14 15. Plaintiff Angela Williams is an individual residing in Texas.

15 16. Plaintiff Jane Doe #1 is an individual residing in California.

16 17. Plaintiff Jane Doe #2 is an individual residing in Texas.

17 18. Due to the sensitive, private, nature of Plaintiff Jane #1 and Plaintiff Jane Doe
18 #2’s allegations, and the potential for harmful retaliation against them, Plaintiffs Jane Does #1
19 and #2 requests that this Court permit them to proceed under pseudonyms. Courts recognize
20 an exception to the general rule that pleadings name all parties when the issues involved are of
21 a sensitive and highly personal nature.

22 19. For good cause, as exists here, the Court may permit Plaintiffs Jane Does #1
23 and #2 to proceed in pseudonym to protect a party from annoyance, embarrassment,
24

1 oppression, or undue burden or expense. Here, granting pseudonym status is warranted
2 because this litigation will involve the disclosure of stigmatizing sexual information, including
3 rape. Plaintiffs fears the stigma from their family, friends, current and future employers, and
4 communities if their true identities are revealed in the public record.

5 20. Defendants will not be prejudiced by Plaintiffs' use of pseudonyms. Plaintiffs
6 will agree to reveal their identities to the Defendants for the limited purpose of investigating
7 Plaintiffs' claims once the parties are governed by a protective order. Plaintiffs simply seek
8 redaction of their personal identifying information from the public docket and assurances that
9 Defendants will not use or publish Plaintiffs' identities in a manner that will compromise their
10 personal lives or future employment prospects.

11 21. Plaintiff Jane Doe #2's motion for a protective order and leave to proceed
12 pseudonymously is forthcoming.

13 22. Defendant Steve Sisolak is the Governor of Nevada, ultimately responsible for
14 enforcing Nevada's laws and regulations, and is sued in his official capacity.

15 23. Defendant Aaron Ford is the Attorney General of Nevada, who is authorized to
16 enforce and prosecute violations of Nevada's laws and regulations, and is sued in his official
17 capacity.

18 24. Defendants Sisolak and Ford will be referred to here as "State Defendants."

19 25. Defendant City of Las Vegas is a municipal corporation authorized under
20 Nevada law with the power to sue and be sued, to issue licenses and otherwise regulate escort
21 agencies, strip clubs, and related businesses, and to enact and enforce certain ordinances
22 challenged in this lawsuit.

23

24

1 26. Defendant Clark County is a municipal corporation authorized under Nevada
2 law with the power to sue and be sued, to issue licenses and otherwise regulate escort agencies,
3 strip clubs, and related businesses, and to enact and enforce certain ordinances challenged in
4 this lawsuit.

5 27. Defendant Nye County is a municipal corporation authorized under Nevada law
6 with the power to sue and be sued, to issue licenses and otherwise regulate brothels within the
7 county, and to enact and enforce certain ordinances challenged in this lawsuit.

8 28. Defendants City of Las Vegas, Clark County, and Nye County will be referred
9 to here as “City Defendants.”

10 29. Defendant Jamal Rashid, also known as “Mally Mall,” is an individual currently
11 residing at Federal Correctional Institution Sheridan, 27072 Ballston Road, Sheridan, OR
12 97378.

13 30. Defendant Mally Mall Music, LLC is a company located at 2764 N Green
14 Valley Pkwy #400, Henderson, NV, 89014, whose registered agent is Jennifer Paone. The
15 managing member is Jamal Rashid, located at 2764 N Green Valley Pkwy #400, Henderson,
16 NV, 89014.

17 31. Defendant Future Music, LLC is a company located at 2764 N Green Valley
18 Pkwy #400, Henderson, NV, 89014, whose registered agent is Jennifer Paone. The managing
19 member is Jamal Rashid, located at 2764 N Green Valley Pkwy #400, Henderson, NV, 89014.

20 32. Defendant PF Social Media Management, LLC is a company located at 2764 N
21 Green Valley Pkwy #400, Henderson, NV, 89014, whose registered agent is Jamal Rashid.

22 33. Defendant Blu Magic Music, LLC is a company located at 2764 N Green Valley
23 Pkwy #400, Henderson, NV, 89014, whose registered agent is Jennifer Paone. The managing
24

1 member is Jamal Rashid, located at 2764 N Green Valley Pkwy #400, Henderson, NV, 89014.

2 34. Defendant Exclusive Beauty Lounge, LLC is a company located at 2764 N
3 Green Valley Pkwy #400, Henderson, NV, 89014, whose managing members are Jamal Rashid
4 and Tarnita Woodard, located at 2764 N Green Valley Pkwy #400, Henderson, NV, 89014,
5 and 7583 S Las Vegas Blvd #123, Las Vegas, NV, 89123, respectively.

6 35. Defendant First Investment Property LLC is a company located at 2764 N Green
7 Valley Pkwy #400, Henderson, NV, 89014, whose registered agent is Jennifer Paone. The
8 managing member is Jamal Rashid, located at 2764 N Green Valley Pkwy #400, Henderson,
9 NV, 89014.

10 36. Defendant V.I.P. Entertainment, LLC is a company located at 2764 N Green
11 Valley Pkwy #400, Henderson, NV, 89014, whose registered agent is Tarnita Woodard. The
12 managing member is John Williams, addressed at 528 S. Casino Center Blvd #300, Las Vegas,
13 NV, 89101.

14 37. Defendant MP3 Productions, Inc. is a company located at 4730 S. Fort Apache
15 Rd., Suite 300, Las Vegas, NV, 89147, whose registered agent is Nevada Corporate
16 Headquarters, Inc. The managing member is Tarnita Woodard, located at 1452 W Horizon
17 Ridge Pkwy #121, Henderson, NV, 89012.

18 38. Defendant MMM Productions, Inc. is a company located at 2520 St. Rose Pkwy
19 Ste 319, Henderson, NV, 89074, whose registered agent is United Corporate Headquarters, Inc.
20 The managing member is Jamal Rashid, located at 420 Lexington Ave., Suite 1756, New York,
21 NY, 10170.

22 39. Defendant E.P. Sanctuary is a nonprofit located at 2764 N Green Valley Pkwy
23 #400, Henderson, NV, 89014, whose registered agent is Jamal Rashid, located at 2764 N Green
24

1 Valley Pkwy #400, Henderson, NV, 89014.

2 40. On information and belief, while not all of the companies listed are Mr.
3 Rashid's escort ventures, all of the companies received or currently receive revenue and
4 engaged in profit sharing with the escort companies. They also raise concerns of commingling
5 assets and self-dealing.

6 41. Defendants Mally Mall Music, LLC, Future Music, LLC, PF Social Media
7 Management, LLC, E.P. Sanctuary, Blu Magic Music, LLC, Exclusive Beauty Lounge, LLC,
8 First Investment Property LLC, V.I.P. Entertainment, LLC, MP3 Productions, Inc., and MMM
9 Productions, Inc. are legally affiliated with Defendant Jamal Rashid and will be referenced
10 here with Rashid as "Escort Agency Defendants."

11 42. Defendant SHAC, LLC d/b/a Sapphire Gentlemen's Club and/or Sapphire, is a
12 company located at 3025 Sammy Davis Jr. Dr., Las Vegas, NV, 89109. Defendant SHAC MT,
13 LLC is a company located at 3135 S. Industrial Rd Suite 219, Las Vegas, NV, 89109. Sapphire
14 Las Vegas (Sapphire) is located at 3025 Sammy Davis Jr. Dr., Las Vegas (Winchester), NV
15 89109.

16 43. Defendant Las Vegas Bistro, LLC d/b/a Larry Flynt's Hustler Club is a
17 company located at 701 S Carson St.Suite 200, Carson City, NV, 89701. Larry Flynt's Hustler
18 Club (Hustler) is located at 6007 Dean Martin Dr, Las Vegas (Paradise), NV 89118.

19 44. Defendants SHAC, LLC d/b/a Sapphire Gentlemen's Club and/or Sapphire,
20 SHAC MT, LLC, and Las Vegas Bistro, LLC d/b/a Larry Flynt's Hustler Club will be
21 referenced here as "Strip Club Defendants."

22 45. Defendant Western Best, Inc. d/b/a Chicken Ranch is a company located at
23 6166 S. Sandhill Rd. #140, Las Vegas, NV, 89121. Western Best LLC is a company located
24

1 at 6166 S. Sandhill Rd. #140, Las Vegas, NV, 89121. Western Best, Inc. and/or Western Best
2 LLC own the Chicken Ranch, a legal brothel located at 10511 Homestead Rd, Pahrump, NV
3 89061.

4 46. The corporations above are incorporated and/or licensed under Nevada law with
5 the power to sue and be sued.¹

6 47. Defendants Western Best, Inc. d/b/a Chicken Ranch and Western Best LLC will
7 be referenced here as “Brothel Defendants.” Brothel Defendants, together with the Escort
8 Agency Defendants and Strip Club Defendants will be referenced here as “Sex Industry
9 Defendants.”

10 **BACKGROUND**

11 *The US sex trade in historical context*

12 *Sex trafficking and chattel slavery*

13 48. For over three hundred years, African people and their descendants were
14 bought, sold, and used in chattel slavery in the Americas, that is, they were legally considered
15 property, and were subjected to untold abuses, including torture, murder, family separation,
16 coercion, and exploitation of their labor.

17 49. Sex slavery was a part of chattel slavery in the American South. White men
18 subjected enslaved women and girls to rape and sexual abuse and harassment as a matter of
19 course,² and women and girls were also sold specifically for prostitution in the
20 euphemistically-named “fancy” trade.³

22 ¹ A revoked or dissolved company can still be sued. See NEV. REV. STAT. §§ 86-274(5), & 86-505.

23 ² Neal Kumar Katyal, *Men Who Own Women: A Thirteenth Amendment Critique of Forced Prostitution*, 103 Yale
L.J. 791, 796–803 (1993).

24 ³ Edward E. Baptist, “Cuffy,” “Fancy Maids,” and “One-Eyed Men”: Rape, Commodification, and The Domestic
Slave Trade in the United States, 106 AM. HIST. REV. 1619, 1619–22 (2001).

1 50. Ellen Brooks was one such woman, bought by Bruckner Payne to be a
2 seamstress (a euphemism), then abused so badly that she died two weeks later.⁴ Enslaved
3 women and girls were also forced to work in or manage brothels, and give their owners the
4 fees they got from sex buyers.⁵

5 51. In Louisiana, some sisters were raised as free daughters of a white planter and
6 his mixed-race mistress. Their father did not establish their legal status, as their mother warned
7 him to do, before he died. His creditors insisted that the sisters were legally slaves and refused
8 their uncle's attempt to buy their freedom; they were sold into the New Orleans sex slavery
9 market to pay for their father's debts.⁶

10 52. In Alexandria, Virginia, Isaac Franklin and John Armfield had the largest,
11 wealthiest slave trading firm in the United States in the 1820s and 1830s.⁷ Franklin was one
12 of the main pimps for the New Orleans sex trafficking market.⁸ Both men joked in their letters
13 to each other about the women they routinely raped.⁹

14 53. This pervasive, commercialized sexual violence was not only admitted by the
15 perpetrators, but decried by several abolitionists. Harriet Jacobs, a formerly enslaved woman,
16 wrote that as a 15-year-old, she was subjected to daily sexual abuse at the hands of her owner.¹⁰
17 Frederick Douglass called slave owners legalized brothel keepers, and averred that at least a
18
19

20 ⁴ Walter Johnson, *Soul by Soul: Life Inside the Antebellum Slave Market* 115 (Harvard University Press, 1999).

21 ⁵ Judith Schafer, *Brothels, Depravity and Abandoned Women: Illegal Sex in Antebellum New Orleans* 11 LA. STATE
UNIV. PRESS (2009).

22 ⁶ 2 Harriet Martineau, *Society in America* 115-16, (Julia Miller ed., Project Gutenberg 2016) (1837).

23 ⁷ Hannah Natanson, *They were Once America's Cruellest, Richest Slave Traders. Why Does No One Know Their*
24 *Names?*, WASHINGTON POST (Sept. 14, 2019, 7:00 AM),
<https://www.washingtonpost.com/history/2019/09/14/they-were-once-americas-cruellest-richest-slave-traders-why-does-no-one-know-their-names/>.

⁸ Baptist, *supra* note 2, at 1619.

⁹ Natanson, *supra* note 6.

¹⁰ Cheryl Nelson Butler, *The Racial Roots of Human Trafficking*, 62 UCLA L. REV. 1464, 1473-75 (2015).

1 million enslaved women were “consigned to a life of revolting prostitution” in the South.¹¹

2 54. One proslavery advocate confessed as much, writing: “The fact is, that, in the
3 Southern States, the prostitutes of the communities are usually slaves, unless they are imported
4 from the free states. The negro and the colored woman in the south, supply the place, which
5 at the north is usually filled with factory and serving girls.”¹²

6 *The Thirteenth Amendment*

7 55. The Thirteenth Amendment was ratified in 1865, following the Civil War, to
8 abolish slavery and involuntary servitude, except as a punishment for a crime.

9 56. After the Amendment was ratified, Southern states attempted to evade its
10 implications, including through allowing debt bondage, that is, compelled or voluntary labor to
11 repay a debt. Congress then passed the Peonage Act in 1867, banning debt bondage.¹³

12 57. The United States Supreme Court also clarified the Amendment’s application
13 was not limited to the enslavement of black people in the American South, but to all persons,
14 and to any form of slavery or involuntary servitude.¹⁴

18 ¹¹ Katyal, *supra* note 1, at 799 (quoting *Frederick Douglass Discusses Slavery, 1850, in A Documentary History*
19 *of the Negro People in the United States* 309, 313 (Herbert Aptheker ed., 2d ed. 1969)(“I hold myself ready to
20 prove that more than a million of women, in the Southern States of this Union, are, by the laws of the land, and
21 through no fault of their own, consigned to a life of revolting prostitution I am also prepared to prove that slave
22 breeding is relied upon by Virginia as one of her chief sources of wealth. It has long been known that the best
23 blood of old Virginia may now be found in the slave markets of New Orleans. It is also known that slave women,
24 who are nearly white, are sold in those markets, at prices which proclaim, trumpet-tongued, the accursed purposes
to which they are to be devoted. Youth and elegance, beauty and innocence, are exposed for sale upon the auction
block; while villainous monsters stand around, with pockets lined with gold, gazing with lustful eyes upon their
prospective victims[.]”).

¹² W. Gilmore Simms, *The Morals of Slavery*, 39-40; *reprinted in THE PRO-SLAVERY ARGUMENT* 175, 2230
(Lippincott, Grambo, & Co. 1853), <https://archive.org/details/proslaveryargum00unkngoog/page/n239/mode/2up>.

¹³ 42 U.S.C. § 1994. *See also* 42 U.S. Code § 1994-Peonage Abolished, CORNELL L. SCH.,
<https://www.law.cornell.edu/uscode/text/42/1994> (last visited July 14, 2021).

¹⁴ *See, e.g., The Slaughterhouse Cases*, 83 U.S. (16 Wall.) 36 (1873).

1 58. Southern states then started enacting criminal fraud statutes. For example, a
2 person who entered into a written contract for services in Alabama, received payment, and then
3 failed to do the work or return the money could be charged with criminal fraud.¹⁵

4 59. The Supreme Court held that Alabama’s law violated the Thirteenth
5 Amendment, because threatening criminal penalties for failure to perform a contract was a way
6 to indirectly coerce labor through debt bondage.¹⁶

7 60. Alabama tried to argue that the law was merely a neutral fraud statute, but the
8 Court reasoned that using apparently neutral statutes that had the effect – through the
9 independent actions of third parties – of perpetuating slavery violated the Thirteenth
10 Amendment.¹⁷

11 *Feminist activism and legal reforms*

12 61. Many abolitionists were also active in movements to secure women’s rights.
13 Feminist activism in the late 1800s and early 1900s was concerned with preventing men’s
14 violence against women, including statutory rape, domestic violence, and prostitution.¹⁸

15 62. In particular, activists focused on stopping what they called “white slavery” –
16 that is, women and girls being forced, coerced, or defrauded into prostitution.

17 63. Despite the characterization of sex trafficking as a danger primarily to white
18 women, which was often fueled by racism, women of color remained very vulnerable to
19 commercial sexual exploitation after the Thirteenth Amendment was enacted.

20 _____
21 ¹⁵ *Bailey v. Alabama*, 219 U.S. 219, 227–28 (1911). There was an intent requirement: you had to intend to injure
or defraud the employer, but with a significant caveat: simply failing to provide the services – for whatever reason
– was considered evidence of intent to commit fraud.

22 ¹⁶ *Bailey v. Alabama*, 219 U.S. 219, 238-242, 245 (1911).

23 ¹⁷ *Id.*

24 ¹⁸ See, e.g., Bonnie Shucha, *White Slavery in the Northwoods: Early U.S. Anti-Sex Trafficking
and its Continuing Relevance to Trafficking Reform*, 23 Wm. & Mary J. Race, Gender, & Soc. Just. 75, 75–76
(2016); Jane E. Larson, “*Even a Worm Will Turn at Last*”: *Rape Reform in Late Nineteenth-Century America*, 9
YALE J. L. & HUMANS. 1, 2–4 (1997); Katyal, *supra* note 1, at 805–06.

1 64. During the Jim Crow era, red light districts were placed in black neighborhoods,
2 and segregation did not stop white men from frequenting them.¹⁹

3 65. A similar story played out in the North, with Southern black women being
4 promised big city factory jobs and then forced into prostitution when they arrived.²⁰

5 66. Additionally, Chinese women were trafficked into the United States for purposes
6 of prostitution,²¹ into situations recognized as slavery by the Ninth Circuit in at least one case.²²

7 67. For many key feminist activists in the nineteenth and early twentieth centuries
8 campaigning against prostitution as a form of men’s violence against women was central to
9 their advocacy.

10 68. One of these was the prominent physician and theologian Katharine Bushnell, a
11 spokesperson for the Women’s Christian Temperance Union, who spent several years opposing
12 the prostitution of Chinese women and girls in the San Francisco area, who were exploited by
13 Chinese traffickers and white male buyers.²³

14 69. Some women and girls were auctioned off for prostitution at San Francisco’s
15 wharf, well after slavery had been outlawed in the United States.²⁴

16 70. Women formed a mission house as a refuge for prostituted women and girls,
17

18 ¹⁹ Vednita Nelson, *Prostitution: Where Racism & Sexism Intersect*, 1 MICH. J. GENDER & L. 81, 84 n.14 (1993).
19 See also Anna Julia Cooper, *A Voice from the South* 12 (1891) (noting the need for a White Cross league – an
anti-prostitution organization which focused its efforts on men – for black women and girls).

²⁰ Butler, *supra* note 9, at 1490.

²¹ See, e.g., *Id.* at 1480.

²² The court found that this fact did not enable them to prevent enforcement of immigration laws. *United States
20 v. Ah Sou*, 138 F. 775, 777–78 (9th Cir. 1905) (“The fact that the deportation of a Chinese slave girl illegally
21 brought into this country for purposes of prostitution by her master, from whom she subsequently escaped, would
22 result in remanding her to slavery and degradation, affords no ground upon which the courts can refuse to enforce
the statute.”).

²³ Dana Hardwick, *San Francisco and ‘Social Hygiene,’* in *Oh Thou Woman that Bringest Good Tidings*, 73-75
(2002).

²⁴ Anna Diamond, *The Women Who Waged War Against Sex Trafficking in San Francisco*, SMITHSONIAN
23 MAGAZINE (May 8, 2019), [https://www.smithsonianmag.com/history/women-banded-together-fight-slavery-san-
24 francisco-180972113/](https://www.smithsonianmag.com/history/women-banded-together-fight-slavery-san-francisco-180972113/).

1 facing down pressure from white city officials and Chinese organized crime.

2 71. Bushnell similarly investigated and exposed the sex trafficking of women and
3 girls into Wisconsin in the 1880s, where many brothels were attached to logging camps.²⁵

4 72. Bushnell also worked with Josephine Butler, an abolitionist and women's rights
5 activist, to combat the exploitation of women and girls through prostitution in other countries
6 as well, including China, India, and the United Kingdom.

7 73. For example, in nineteenth century Britain, Josephine Butler's campaign to
8 eradicate the Contagious Diseases Act centered on the fact that the process was invasive,
9 degrading, and stigmatizing. The testing of alleged prostituted women, and not male buyers,
10 highlighted the disparity between the prostituted and those exploiting them. It not only
11 neglected the harm of prostitution itself but compounded its harm by only protecting the male
12 buyer. It was successfully repealed in 1886.²⁶

13 74. In 1910, Congress passed the Mann Act, which criminalized the interstate or
14 foreign transport of women and girls for prostitution purposes.²⁷ Congressional reports from
15 that time show that Congress considered what they termed "forced prostitution" to be a form
16 of slavery.²⁸

17 75. Between 1904 and 1949, a number of international treaties also sought to
18 address the sex trafficking of women and girls, assuming a direct connection between
19 prostitution and exploitation.²⁹

20 _____
21 ²⁵ See, e.g., Bonnie Shucha, *White Slavery in the Northwoods: Early U.S. Anti-Sex Trafficking and Its Continuing Relevance to Trafficking Reform*, 23 Wm. & Mary J. Women & L. 75 (2016).

22 ²⁶ Josephine Butler, *Josephine Butler and the Prostitution Campaigns: Diseases of the Bodily Politic* (Jane Jordan & Ingrid Sharp eds., 2004), <https://www.routledgehistoricalresources.com/feminism/sets/josephine-butler-and-the-prostitution-campaigns>.

23 ²⁷ *Mann Act*, CORNELL L. SCH., https://www.law.cornell.edu/wex/mann_act (last visited Apr. 21, 2021).

24 ²⁸ See also Katyal, *supra* note 1, at 806 (citing H.R. Rep. No. 47, 61st Cong., 2d Sess. 10 (1909); S. Rep. No. 886, 61st Cong., 2d Sess. 11 (1909)).

²⁹ See Convention for the Suppression of the Traffic in Persons and of the Exploitation of the Prostitution of Others.

1 ***The Nevada sex trade in contemporary context***

2 *Federal and international laws on sex trafficking*

3 76. In 2000, Congress passed the Trafficking Victims Protection Act, the first
4 comprehensive law in the United States to explicitly penalize the full range of human
5 trafficking offenses, including sex trafficking.

6 77. Congress reauthorized the law in 2003 as the Trafficking Victims Protection
7 Reauthorization Act (TVPRA) and created a civil cause of action. 18 U.S.C. § 1595.

8 78. Under the TVPRA, sex trafficking occurs if there is a commercial sex act
9 involving a person under age 18 or a person induced by force, fraud, or coercion.³⁰ This is
10 considered a severe form of trafficking in persons under federal law. 22 U.S. Code § 7102
11 (11)(A). Anyone who “recruits, entices, harbors, transports, provides, obtains, advertises,
12 maintains, patronizes, or solicits by any means” or “benefits, financially” from sex trafficking
13 can be held liable.

14 79. Commercial sex act means “any sex act, on account of which anything of value
15 is given to or received by any person.”³¹

16 80. Coercion includes “threats of serious harm to or physical restraint against any
17 person; any scheme, plan, or pattern intended to cause a person to believe that failure to

18 July 25, 1951, 96 U.N.T.S. 271, <https://www.ohchr.org/en/professionalinterest/pages/traffickingpersons.aspx>.

19 (1) International Agreement of 18 May 1904 for the Suppression of the White Slave Traffic, as
20 amended by the Protocol approved by the General Assembly of the United Nations on 3
December 1948,

(2) International Convention of 4 May 1910 for the Suppression of the White Slave Traffic, as
21 amended by the above-mentioned Protocol,

(3) International Convention of 30 September 1921 for the Suppression of the Traffic in Women
and Children, as amended by the Protocol approved by the General Assembly of the United
22 Nations on 20 October 1947,

(4) International Convention of 11 October 1933 for the Suppression of the Traffic in Women
of Full Age, as amended by the aforesaid Protocol

23 *Id.* pmbl.

³⁰ 18 U.S.C. § 1591.

24 ³¹ *Id.* at § 1591(e)(3).

1 perform an act would result in serious harm to or physical restraint against any person; or the
2 abuse or threatened abuse of law or the legal process.”³²

3 81. Serious harm refers to “any harm, whether physical or nonphysical, including
4 psychological, financial, or reputational harm, that is sufficiently serious, under all the
5 surrounding circumstances, to compel a reasonable person of the same background and in the
6 same circumstances to perform or to continue performing commercial sexual activity in order
7 to avoid incurring that harm.”³³

8 82. Section 1595 authorizes civil claims against sex trafficking perpetrators, as well
9 as anyone who “knowingly benefits, financially or by receiving anything of value” from
10 participating in what the person knew or should have known was a sex trafficking venture.³⁴

11 83. Prostitution continues to be against federal policy as a form of sexual
12 exploitation that is linked to sex trafficking.³⁵

13 84. This is consistent with international law. The 1949 UN Convention for the
14 Suppression of the Traffic in Persons and of the Exploitation of the Prostitution of Others states
15 that, “prostitution and the accompanying evil of the traffic in persons for the purpose of
16 prostitution are incompatible with the dignity and worth of the human person,” and forbids
17 prostitution related activities, including exploiting “the prostitution of another person, even
18 with the consent of that person.”³⁶

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21 ³² *Id.* at § 1591(e)(2).

³³ *Id.* at § 1591(e)(5).

³⁴ 18 U.S.C. § 1595.

³⁵ *See, e.g.*, 22 U.S.C. § 7601 (“Prostitution and other sexual victimization are degrading to women and children and it should be the policy of the United States to eradicate such practices.”).

³⁶ Convention for the Suppression of the Traffic in Persons and of the Exploitation of the Prostitution of Others, pmbi., Art. 1, July 25, 1951, 96 U.N.T.S. 271, <https://www.ohchr.org/en/professionalinterest/pages/trafficingpersons.aspx>.

1 *Connections between prostitution and sex trafficking*

2 85. It is also borne out by experience. Prostitution is associated with a high risk of
3 sexual assault and other violence, predominately from sex buyers.³⁷

4 86. When prostitution is legal, it leads to increased sex trafficking to meet demand.
5 This has occurred in Rhode Island and in the Netherlands.

6 87. In Rhode Island, indoor prostitution was decriminalized from 1980-2009 and
7 during that period of time the illicit trade exploded, and it heavily involved organized crime.³⁸

8 88. Brothels existed under the guise of spas and health services but were deeply
9 intertwined with the international trafficking of Asian women.³⁹

10 89. Men visited these spas from nearby states in droves and their reviews of these
11 places increased by 200% reflecting the explosion of the sex trade, especially in Providence.⁴⁰

12 90. The lack of regulations also meant that 16- and 17-year-olds were involved in
13 these enterprises, police were unable to adequately investigate matters, and labor laws or code
14 violations were insufficient ways to get at the more serious crimes.⁴¹

15 91. Legalization in the Netherlands has also been ineffective at curbing illegal
16

17 ³⁷ For example, a study of 562 women exploited in prostitution in Miami, Florida (USA) found the lifetime
18 prevalence of abuse was extremely elevated at 88%, and 34% reported violent encounters with “dates” or clients
19 in the prior 90 days. Serious mental illness among this population of prostituted women was quite common, with
20 74% reporting severe symptoms of depression, anxiety, or traumatic stress. Hilary L. Surratt et al., *HIV Risk
21 Among Female Sex Workers in Miami: The Impact of Violent Victimization and Untreated Mental Illness*, 24 AIDS
22 CARE, 553-561 (2012). Also, a study of homicide in the United States from 1970 to 2009 found that prostituted
23 persons accounted for 32% of all cases of serial murder involving female victims only. The proportion of serial
24 murders with female prostituted victims increased across the study period, from 16% during 1970-1979 to 69%
during 2000-2009. Killers of prostituted women also amassed a greater average number of victims than do killers
of other victim types and kill for slightly longer periods of time. Kenna Quinet, *Prostitutes as Victims of Serial
Homicide: Trends and Case Characteristics, 1970-2009*, 15 HOMICIDE STUDIES 74-100 (2011).

³⁸ Melanie Shapiro & Donna M Hughes, *Decriminalized Prostitution: Impunity for Violence and Regulation*,
52 WAKE FOREST L. REV. 534 (2017).

³⁹ *Id.* at 545. In fact, the largest mafia bust in FBI history resulted from infiltration of these brothels and led to the
arrest of over 127 people from seven crime families including the Gambinos, with extortion efforts totaling up to
1.5 million dollars. *Id.* at 547.

⁴⁰ *Id.* at 540.

⁴¹ *Id.* at 552-555.

1 activities. In fact, the illegal industry flourishes, and the criminals who run those operations
2 also participate in the legal industry, which further provides cover for their illicit activities.⁴²
3 Multiple studies out of the Netherlands indicate organized crime permeates it, and conclude
4 that it is impossible to eliminate, or even reduce, the criminal aspects of the sex trade.⁴³ These
5 conclusions have led legislators to consider new approaches and revamp their existing
6 policies.⁴⁴

7 92. In Nevada, the signs point to the same conclusion. In the United States, it is
8 believed that illegal prostitution generates over 14 billion dollars of revenue.⁴⁵ Of that, 5
9 billion is generated in Vegas alone,⁴⁶ even though prostitution is not legal in Las Vegas. Legal
10 brothels are reported to provide 75 million dollars of revenue for the state.⁴⁷ More to the point,
11 they allow the sex trade to flourish all over the state and become a part of tourist expectations,
12 which furthers growth of state revenue. In other words, the legal trade correlates with
13 exponential increases in the illegal trade and state cash flow.

14 93. The legal trade also correlates with an increase in sex trafficking: two multi-
15 country studies have concluded that wherever there is legal or decriminalized prostitution,
16 human trafficking increases. One study compared 39 nations and the other was more
17 expansive, assessing 150 countries, and both found a relationship between prostitution laws
18 and sex trafficking.⁴⁸ Sex trafficking is greater in countries where prostitution is legal or
19

20 ⁴² Sheila Jeffreys, *Brothels Without Walls: The Escort Sector as a Problem for the Legalization of Prostitution*, 17
SOC. POL.: INT'L STUD. GENDER, ST., SOC'Y 210 (2010).

21 ⁴³ Karin Werkman, *Briefing on Legal Prostitution in The Netherlands: Policies, Evaluations, Normalisation*, June
2016, [feminismandhumanrights.files.wordpress.com/2014/06/karin-werkman-2016-briefing-on-legal-
prostitution-in-the-netherlands.pdf](https://feminismandhumanrights.files.wordpress.com/2014/06/karin-werkman-2016-briefing-on-legal-prostitution-in-the-netherlands.pdf) (last visited Sep. 9, 2021).

22 ⁴⁴ Jeffreys, *supra* note 42, at 11.

23 ⁴⁵ Prostitution Revenue by Country, HAVOCSCOPE, [https://www.havocscope.com/prostitution-revenue-by-
country/3809085/](https://www.havocscope.com/prostitution-revenue-by-country/3809085/) (last visited July 14, 2021).

24 ⁴⁶ Ronald B. Flowers, *Prostitution in the Digital Age: Selling Sex from the Suite to the Street* 42-46 (2011).

⁴⁷ *Id.*

⁴⁸ Niklas Jakobsson & Andreas Kotsadam, *The Law and Economics of International Sex Slavery: Prostitution*

1 decriminalized.⁴⁹

2 *Nevada's legal norms and sex trafficking*

3 94. In the United States, Nevada stands alone in maintaining legalized prostitution,
4 in apparent defiance of the legal and human rights norms and data described above.

5 95. While Nevada has allowed brothel operation since the nineteenth century, the
6 first officially sanctioned brothel, Mustang Ranch, was licensed by Storey County in 1971.

7 96. Nevada then enacted NEV. REV. STAT. § 244.345(8), legalizing prostitution in
8 county-licensed brothels, for counties with fewer than 200,000 residents.

9 97. Prostitution is now permitted in counties that have fewer than 700,000
10 residents, and Nevada currently has legal brothels in seven counties: Elko,⁵⁰ Lander,⁵¹ Lyon,⁵²
11 Mineral,⁵³ Nye,⁵⁴ Storey,⁵⁵ and White Pine.⁵⁶

12 98. State regulations force women in prostitution to get tested for sexually
13 transmitted infections every week. NEV. ADMIN. CODE § 441A.800.

14 99. Nevada does not require sex buyers to undergo any similar testing. Not unlike
15 the Contagious Diseases Act in nineteenth-century Great Britain described above, the one-
16 sided testing protects the sex buyer and compounds the harm to and burden on the prostituted
17 persons.

19 *Laws and Trafficking for Sexual Exploitation*, 35 EUR. J. L. AND ECON. 1 (2013); Seo-Young Cho, Axel Dreher,
20 & Eric Neumayer, *Does Legalized Prostitution Increase Human Trafficking?*, WORLD DEV. 41 (2013).

⁴⁹ *Id.*

⁵⁰ ELKO, NEV., COUNTY CODE, §6-11 (2020) (defining sexually oriented businesses and employee licensing).

⁵¹ LANDER, NEV., COUNTY CODE, “Prostitution,” §5.16 (2020) (defining prostitution).

⁵² LYON, NEV., COUNTY CODE, §5.03 (2020) (defining brothels).

⁵³ MINERAL, NEV., COUNTY CODE, §5.12 (2019) (defining prostitution).

⁵⁴ NYE, NEV., COUNTY CODE, §9.20 (2020) (defining prostitution).

⁵⁵ STOREY, NEV., COUNTY CODE, §5.16 (2015) (defining brothels).

⁵⁶ WHITE PINE, NEV., COUNTY CODE, §10.36 (2021) (disallowing prostitution in unincorporated areas of White Pine, but allowing such activity within the incorporated areas). *See* ELY, NEV., CITY ORDINANCE, “Prostitution,” §3.6 (2020) (city within White Pine County explicitly authorizing prostitution).

1 100. Nevada also permits cities and counties to license escorting, and what it terms
2 “entertainment by referral service,” defined as follows:

3 (a) “Entertainer for an entertainment by referral service” means a natural person
4 who is sent or referred for a fee to a hotel or motel room, home or other
5 accommodation by an entertainment by referral service for the purpose of
entertaining the person located in the hotel or motel room, home or other
accommodation.

6 (b) “Entertainment by referral service” means a person or group of persons who
7 send or refer another person to a hotel or motel room, home or other
8 accommodation for a fee in response to a telephone or other request for the
purpose of entertaining the person located in the hotel or motel room, home or
other accommodation.

9 NEV. REV. STAT. § 244.345(8).

10
11 101. Nevada permits counties to self-regulate as to prostitution. In Storey County,
12 the local brothel owner is also a county commissioner who sits on the brothel board, the
13 government entity that supposedly regulates the brothels.⁵⁷

14 102. In the legal brothels, women are commonly subjected to a number of practices
15 that amount to debt bondage, including:

- 16 • Being locked inside the brothels and not allowed to leave for weeks at a time;
- 17 • Having to give the brothel 50% of their earnings;
- 18 • Being required to follow the brothel’s rules or face fines; and
- 19 • Being forced to live on the premises and pay the brothels for room and board to
20 do so.

21 103. Most Nevada brothels are located in the middle of the desert – that is, in
22 extremely remote locations, with few trees or spaces where a person would not be almost
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24 ⁵⁷ See STOREY, NEV., COUNTY CODE, § 5.16 (2015).

1 immediately visible, and often without meaningful access to public transportation. Some are
2 also surrounded by high fences.

3 104. The practices described above are inherently coercive, particularly given the
4 geographic context, and lead to women in prostitution owing the brothels money and being
5 held in debt bondage in legal Nevada brothels.

6 105. Many women prostituted in Nevada brothels are controlled by outside pimps,
7 in addition to brothels themselves, which also act as pimps.

8 106. One federal court acknowledged this problem recently, citing a study that found
9 that pimps remained common and some assaults against prostituted women occurred within
10 Nevada's legal brothels. *Coyote Publishing, Inc. v. Miller*, 598 F. 3d 592, 596 n.2 (2010).

11 107. And in 2018, the Lyon County Sheriff's Office conducted multiple brothel work
12 card compliance checks, assisted by U.S. Immigration and Customs Enforcement officials.
13 They found numerous illegal practices, including immigration law violations, fraudulent
14 statements, and sex trafficking indicators.⁵⁸

15 108. Prostitution is legal in Nye County, which is just outside Las Vegas.

16 109. The Nye County Code states that solicitation is illegal unless it occurs within a
17 legal brothel. Nye Co. Code § 9.20.160.

18 110. The Nye County Code defines solicitation as someone who offers to engage in
19 prostitution, or who "[i]nduces, persuades, encourages, inveigles or compels" someone else to
20 do so. Nye Co. Code § 9.20.020.

21 111. The Nye County Code does not define "compel."

22 112. By implication, Nye County does not ban compelling prostitution as long as the
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24 ⁵⁸ Lyon County Sheriff's Office, *Internal Audit Report on Brothel Compliance Requirements* (2018).

1 perpetrator does so in a legal brothel.

2 113. Compelling someone to engage in prostitution violates federal law, which bans
3 sex trafficking, including coercing people into commercial sex acts.

4 114. The Nye County brothel licensing board *may* refuse to grant a brothel license
5 to someone who has been convicted of a felony, has a financial interest in an illegal prostitution
6 business, is under twenty-one years old, or who has had a previous brothel license revoked for
7 cause, but *is not required* to do so. Nye Co. Code § 9.20.120.

8 115. Prostitution is officially illegal in Las Vegas and Clark County, though this is
9 more pretense than reality.

10 116. Las Vegas has legalized escorts and escort bureaus. LAS VEGAS, NEV., MUN.
11 CODE § 6.36.010 (2020).

12 117. Escorting is a common front for prostitution. Defendant City of Las Vegas is
13 aware of this, noting in its own code the need to prevent prostitution without implicating “free
14 expression.” LAS VEGAS, NEV., MUN. CODE § 6.57.010.⁵⁹

15 118. Escorts may not operate independently, but are forced by law to be managed by
16 an escort agency, and only one at a time. *Id.* § 6.36.170, 6.36.190.

17 119. By city regulation, escorts must submit to medical testing and provide “written
18 evidence” from a physician who has deemed them “free from any communicable diseases”
19 twice a year to maintain work card status. *Id.* § 6.36.160.⁶⁰ No such requirement is imposed

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22 ⁵⁹ The Clark County ordinances are more explicit about this compromise: “The cover of the First Amendment has
23 materially increased the burden of policing this business to decrease the incidence of prostitution and drug sales.”
24 CLARK, NEV., COUNTY CODE § 6.140 (2021). Las Vegas is located in Clark County. The ordinances for Clark
apply to the unincorporated parts of the county. *Id.*

⁶⁰ See also City of Las Vegas Department of Planning Business Licensing Division, *Checklist/Instructions –
Escort Bureau – Form PL056* (revised Apr. 11, 2016), [https://files.lasvegasnevada.gov/business-
licensing/Escort-Bureau-Web-Instruction-Sheet.pdf](https://files.lasvegasnevada.gov/business-licensing/Escort-Bureau-Web-Instruction-Sheet.pdf).

1 on the men who patronize the escorts.

2 120. Clark County, where Las Vegas is located, also has ordinances licensing escort
3 businesses,⁶¹ as well as regulations licensing outcall entertainment.⁶²

4 121. Similar to the state statute, Clark County defines the latter as follows:

5 “Outcall” or “entertainment by referral” service means a person or group of
6 persons who send or refer another person to a hotel or motel guest room for a
7 fee in response to a telephone call or other request for the purpose of
8 entertaining the person located in the hotel or motel guest room.⁶³

8 122. Clark County criminalizes prostitution.⁶⁴

9 123. Strip clubs are also common fronts for prostitution. Defendants City of Las
10 Vegas and Clark County are aware of this, directly acknowledging that strip clubs are
11 connected to both prostitution and organized crime in the preface to their regulations.⁶⁵ The
12 City also bans dancers from being alone in private rooms with club patrons.⁶⁶

13 124. Defendant Clark County has no such prohibition, but its ordinances provide:
14 “Dancers shall not mingle with the patrons while in an unclothed or nude state at the licensed
15 establishment.”⁶⁷

16 125. Both the City of Las Vegas and Clark County regulate strip clubs extensively,
17 distinguishing between venues allowing partial and full nudity,⁶⁸ permitting alcohol to be sold

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19 ⁶¹ See CLARK, NEV., COUNTY CODE §§ 8.32.010-150 (2021). Clark County distinguishes between “service-
20 oriented” and “sexually-oriented” escort businesses, See CLARK, NEV., COUNTY CODE §§ 8.32.160 and provides
21 that licenses may be denied to participants in sexually oriented escorting, id at §§ 8.32.80, 140, but does not
22 actually require denial.

⁶² See CLARK, NEV., COUNTY CODE §§ 6.140.030-140 (2021).

⁶³ See CLARK, NEV., COUNTY CODE § 6.140.020 (2021).

⁶⁴ See CLARK, NEV., COUNTY CODE § 6.140.150 (2021).

⁶⁵ LAS VEGAS, NEV., MUN. CODE § 6.35.010 (findings as to erotic dance establishments); CLARK, NEV., COUNTY
22 CODE § 6.160.010 (findings as to erotic dance establishments).

⁶⁶ LAS VEGAS, NEV., MUN. CODE § 6.35.100.

⁶⁷ CLARK, NEV., COUNTY CODE § 6.160.110 (2021).

⁶⁸ See LAS VEGAS, NEV., MUN. CODE §§ 6.06B.030 (defining adult nightclubs) and 6.35.030 (defining erotic
23 dance establishments); CLARK, NEV., COUNTY CODE §§ 6.170.030(a)(defining adult nightclubs) and
24 6.160.030(d)(defining erotic dance establishments). “Erotic dance establishments” are venues permitting partial

1 only in the former,⁶⁹ and generally requiring dancers to be eighteen (or, for clubs selling
2 alcohol in Clark County, twenty-one) years of age, and licensed.⁷⁰

3 126. Strip club dancers may not apply for the required work cards unless their
4 employers sign their applications.⁷¹

5 127. Legalized prostitution increases the demand for commercial sex, and men travel
6 to Nevada to buy sex because they incorrectly believe it is legal throughout the state.

7 128. The sex industry exploits this misconception with impunity, that is, by operating
8 both legal and illegal entities that violate federal laws against debt bondage and sex trafficking,
9 without facing any meaningful enforcement from Nevada.

10 129. Prostitution advertising, for both legal and illegal prostitution in Nevada, is
11 pervasive online, and directed toward people outside the counties where prostitution is legal.

12 130. On information and belief, many men who buy women for sex in Nevada come
13 from outside Nevada, many of them induced by online advertising and marketing.

14 131. On information and belief, Nevada does not enforce the advertising regulations,
15 NEV. REV. STAT. §§ 201.430; 201.440, that outlaw prostitution advertisements outside the

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18 nudity (unless not serving alcohol in Clark County, in which case full nudity is permitted), and “adult
19 nightclubs” are venues permitting full nudity. The Strip Club Defendants are erotic dance establishments.
20 ⁶⁹ Compare LAS VEGAS, NEV., MUN. CODE § 6.06B.090(F) (banning alcohol consumption in adult nightclubs)
21 and LAS VEGAS, NEV., MUN. CODE § 6.35.100 (requiring erotic dance establishments to obtain licenses to sell
22 alcohol); compare CLARK, NEV., COUNTY CODE § 6.170.090 (f) (banning alcohol consumption in adult
23 nightclubs) and CLARK, NEV., COUNTY CODE § 6.160.110 (distinguishing between erotic dance establishments
24 that sell alcohol and those that do not).

⁷⁰ Compare LAS VEGAS, NEV., MUN. CODE § 6.06B.090(D)(requiring persons employed as servers or attendants
in adult nightclubs to possess valid permits and to be eighteen years old) and LAS VEGAS, NEV., MUN. CODE §
6.35.100 (requiring persons employed as dancers in erotic dance establishments to possess a valid license and to
be eighteen years old, although patrons must be twenty-one if alcohol is sold); Compare CLARK, NEV., COUNTY
CODE § 6.170.090 (d) (requiring persons employed as servers or attendants in adult nightclubs to possess valid
permits and to be eighteen years old) and CLARK, NEV., COUNTY CODE §6.160.110(d)(requiring persons
employed in erotic dance establishments to possess valid licenses, and to be eighteen if alcohol is not sold, and
twenty-one if it is).

⁷¹ See LAS VEGAS METROPOLITAN POLICE DEPARTMENT, [https://www.lvmpd.com/en-
us/RecordsFingerprintBureau/Pages/WorkCards.aspx](https://www.lvmpd.com/en-us/RecordsFingerprintBureau/Pages/WorkCards.aspx) (last visited Nov. 8, 2021).

1 counties that permit brothels.

2 132. Nevada itself has acknowledged this problem, submitting a federal grant
3 application for combating sex trafficking, admitting that the state is “a major national and even
4 global destination, because Nevada is also synonymous with legalized gambling, legalized
5 prostitution, clubbing, partying, bars, strip clubs, celebrities, glamour and gaudy excess – a
6 grand spectacle of legitimized sin 24/7, 365 days per year!” The application also noted that
7 prostitution is not “universally legal in Nevada,” despite visitors’ belief otherwise, and:

8 Nevada’s legal brothels complicate development of a consistent
9 statewide response to sex trafficking . . . Nevada’s recognition as
10 one of the top trafficking destinations by multiple government
11 and non-profit advocacy agencies is earned by effectively
12 marketing the state’s entertainment and fantasy fulfillment
13 possibilities.⁷²

12 133. Nevada criminalized sex trafficking in 2013.

13 134. Nevada had 4 new federal sex trafficking prosecutions in 2020, for a total of 9
14 active cases (compared to 7 in the District of Columbia, 30 in Illinois, 44 in New York, and 61
15 in Texas), and 0 sex trafficking convictions (compared to more than 150 nationwide).⁷³

16 135. While these numbers may seem reflective of Nevada’s relatively small
17 population (3 million residents),⁷⁴ they are disproportionately low given Nevada’s extremely
18 high tourism numbers: in 2018, Las Vegas had 42.1 million visitors (compared to 21.8 million
19 in Boston, 22.8 million in Washington, DC, 53 million in Atlanta, 57.6 million in Chicago, and
20 65.2 million in New York City).⁷⁵

21 ⁷² OVC FY 2014 Services for Victims of Human Trafficking Grant Application Nevada Office of the Attorney
22 General – Program Narrative.

22 ⁷³ See Kyleigh Feehs & Alyssa Currier Wheeler, *2020 Federal Human Trafficking Report*,
23 <https://www.traffickinginstitute.org/wp-content/uploads/2021/06/2020-Federal-Human-Trafficking-Report-Low-Res.pdf>.

23 ⁷⁴ *Nevada Population*, POPULATIONU, www.populationu.com/us/nevada-population (last visited Aug. 9, 2021).

24 ⁷⁵ *America’s 30 Most Popular Cities for Tourists 2019*, BEST CHOICE REVIEWS, www.populationu.com/us/nevada-population (last visited Aug. 9, 2021).

1 136. On information and belief, Nevada’s economy relies heavily on tourism. The
2 top 15 employers in Clark County in 2020 were all either departments run by city officials or
3 casinos/resorts (with the exception of Nellis Air Force Base).⁷⁶

4 137. Nevada has had significant problems with government corruption, ranking 46
5 out of 50 states and receiving an “F” grade on the Center for Public Integrity’s State Integrity
6 Investigation in 2015.⁷⁷

7 138. Over the last several years, federal corruption probes have investigated
8 Nevada’s then-governor,⁷⁸ and the Las Vegas Metropolitan Police Department – specifically
9 for collaborating with the pimps/sex traffickers they were supposedly investigating.⁷⁹

10 139. On information and belief, there is no state-reported data on sex trafficking
11 investigations, prosecutions, or convictions under state law.

12 140. On information and belief, Nevada does not aggressively prosecute sex
13 trafficking.

14 141. Yet Nevada’s sex trade is disproportionately large; sex trafficking reports in
15 Nevada are out of proportion with the state’s small population size.

16 142. Nevada’s legal brothels generate an estimated \$75 million dollars per year, a

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18 ⁷⁶ See *Comprehensive Area Financial Report*, NEV. LAB. MKT. INFO., <https://nevadaworkforce.com/CAFR> (last
19 visited Sep. 7, 2021). With the exception of the University of Nevada, the top 15 employers for the whole state
20 are exclusively state and local government entities, and casinos/resorts. *20 Largest Employers in Nevada*, NEV.
21 DEP’T OF EMP’T, <https://www.nevadaresorts.org/benefits/largest-employers-full.php>.

22 ⁷⁷ See Felicia Mello, *Nevada Gets F Grade in 2015 State Integrity Investigation*, CENTER FOR PUBLIC INTEGRITY
23 (Nov. 12, 2015, 12:01 PM), <https://publicintegrity.org/politics/state-politics/state-integrity-investigation/nevada-gets-f-grade-in-2015-state-integrity-investigation/>.

24 ⁷⁸ See The Associated Press, *Attorney: Nevada Governor Cleared in FBI Probe*, NBC NEWS (Nov. 2, 2008, 5:25
PM), <https://www.nbcnews.com/id/wbna27507509>.

⁷⁹ See George Knapp and Matt Adams, *I-Team: Former cop, suspected pimp linked together in FBI investigation*,
8 NEWS NOW (Nov. 11, 2016, 12:40pm), <https://www.8newsnow.com/news/i-team-former-cop-suspected-pimp-linked-together-in-fbi-investigation/607916728/>; George Knapp and Matt Adams, *I-Team: Explosive Testimony in Police Corruption Case*, 8 NEWS NOW (Nov. 17, 2018, 8:08 AM), <https://www.8newsnow.com/news/i-team-explosive-testimony-in-police-corruption-case/859451936/>; Dana Gentry, *Cops, pimps winners in FBI Probe*, NEVADA CURRENT (Oct. 31, 2019), <https://www.nevadacurrent.com/2019/10/31/cops-pimps-winners-in-fbi-probe/>.

1 figure dwarfed by the \$5 billion a year Nevada’s illegal sex trade generates.⁸⁰

2 143. The state government receives revenues from prostitution occurring through
3 escort agencies, as it taxes escort agencies and strip clubs 9% of their fees under the state live
4 entertainment tax, NEV. REV. STAT. § 368A.010–368A.370.

5 144. Local governments with legal brothels receive revenues from brothel taxes and
6 fees.

7 145. Nevada does not enforce its limited regulation of prostitution, permitting de
8 facto prostitution to exist through escort bureaus, entertainment by referral service, and strip
9 clubs, failing to implement or enforce laws limiting prostitution advertising, and failing to
10 prevent the resultant debt bondage in legal brothels.

11 146. Nevada allows not only prostitution within legal and rural brothels, but also
12 escorting and “outcall entertainment” – effectively legalizing prostitution throughout the state
13 – directly for small towns and counties, and through euphemism and inaction in the rest,
14 without meaningful prevention or accountability for the severe forms of sex trafficking
15 occurring in the Nevada sex trade.

16 ***Plaintiffs’ exploitation in the sex trade***

17 147. Plaintiffs Angela Williams, Jane Doe #1, and Jane Doe #2 were all induced
18 through force, fraud, and coercion into providing commercial sex acts in Nevada’s legal sex
19 industry, including legal escort agencies, legal strip clubs, and a legal brothel.

20 ***Plaintiff Angela Williams***

21 148. Plaintiff Angela Williams was sex trafficked in Nevada from 2006 to 2017.

22 149. Ms. Williams lived on her own as a seventeen-year-old in Houston. She came
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24 ⁸⁰ Flowers, *supra* note 46.

1 from an economically marginalized family and neighborhood, worked two jobs to support
2 herself, and was attending college.

3 150. During this vulnerable time in her life, Ms. Williams 's first trafficker, Andre
4 McDaniels, introduced himself as a "friend," worked to gain her trust, and enticed her to go to
5 his "modeling studio."

6 151. Ms. Williams later learned that McDaniels's studios⁸¹ were illegal brothels
7 disguised as lingerie modeling studios.

8 152. Ms. Williams did not know what a pimp was, and believed sex-trafficked
9 women were streetwalkers only. She just thought Mr. McDaniels was a rich older man that
10 had other girls from Ms. Williams's high school working for him who could afford to move
11 away from their poor childhood neighborhoods.

12 153. The other high school peers that "worked" for Mr. McDaniels did not initially
13 disclose to Ms. Williams what they were doing at the "modeling studios."

14 154. Ms. Williams later learned that some of the girls who worked for Mr.
15 McDaniels, who was 36, were seventeen years old or younger.

16 155. Mr. McDaniels continued to groom Ms. Williams until she was eighteen, then
17 increased his recruitment tactics.

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21 ⁸¹ On Monday, January 7, 2013, McDaniels was ordered to serve 96 months in federal prison for his convictions
22 of conspiracy to commit sex trafficking, one count of coercion and enticement, and two counts of transportation
23 in relation to Operation Total Exposure, at the time, the largest domestic sex trafficking case in the Southern
24 District of Texas. USAO S. D. TX, *Three Sentenced in Massive Domestic Sex Trafficking Case*, U.S. DEP'T OF
JUST. (Jan. 7, 2013), [https://www.justice.gov/usao-sdtx/pr/three-sentenced-massive-domestic-sex-trafficking-
case](https://www.justice.gov/usao-sdtx/pr/three-sentenced-massive-domestic-sex-trafficking-case). Mr. McDaniels was shortly thereafter convicted for witness tampering in connection to the same case.
USAO S. D. TX, *Witness Tampering Lands Convicted Sex Trafficker More Prison Time*, FBI HOUSTON DIVISION
(June 26, 2013), [https://archives.fbi.gov/archives/houston/press-releases/2013/witness-tampering-lands-
convicted-sex-trafficker-more-prison-time](https://archives.fbi.gov/archives/houston/press-releases/2013/witness-tampering-lands-convicted-sex-trafficker-more-prison-time).

1 156. He showered Ms. Williams with attention, supplied her with marijuana, spent
2 thousands of dollars on lingerie for her, and convinced her to change her appearance, such as
3 her hair color.

4 157. Mr. McDaniels completely isolated Ms. Williams from friends and family.

5 158. Eventually, through fraud and coercion, Mr. McDaniels brought Ms. Williams
6 to his “modeling studio.”

7 159. The other women and girls who worked for Mr. McDaniels eventually
8 manipulated Ms. Williams into believing that prostitution was glamorous and that “working”
9 for Mr. McDaniels was not different than anything she would do for any other boyfriend,
10 except she would get paid extremely well.

11 160. In the beginning, due to the systemized coercion and dehumanization, Ms.
12 Williams minimized the trauma of performing sexual acts on sex buyers since she was
13 surrounded by other young women sex trafficked by Mr. McDaniels and his brothers.

14 161. Ms. Williams was swiftly forced into performing hand jobs on sex buyers
15 before she could make sense of the details.

16 162. Ms. Williams started out by performing hand jobs, and eventually the sex buyer
17 would complain, and another girl would come in the room to finish the service the sex buyer
18 desired, whether it was vaginal or anal sex.

19 163. Ms. Williams did not even know how to perform some of the sexual positions
20 the sex buyers were demanding.

21 164. Mr. McDaniels continued to manipulate and groom Ms. Williams by giving her
22 special treatment and hiding the fact that the sex buyers were unhappy with Ms. Williams being
23 uncomfortable performing sexual acts such as vaginal or anal sex on sex buyers.

24

1 165. Ms. Williams was always the last one to come to the lineup, hoping that a sex
2 buyer would see a different sex trafficked woman first, so she would not have to perform sexual
3 acts.

4 166. Mr. McDaniels would tell some of the sex buyers that Ms. Williams was
5 underage. One sex buyer actually paid Ms. Williams to dress like a cheerleader and meet him
6 at the high school bleachers.

7 167. Despite her distress and unwillingness, Ms. Williams was eventually coerced
8 into performing any sex act requested by the sex buyer.

9 168. Ms. Williams was confused and afraid.

10 169. As is common with grooming, suddenly, just like the rest of the girls working
11 for Mr. McDaniels, Ms. Williams no longer received special treatment and was forced to give
12 all the money she earned from sex buyers to Mr. McDaniels.

13 170. Ms. Williams was not permitted to leave the illegal brothels for periods as long
14 as 24 hours.

15 171. Ms. Williams was only permitted to go “home” from the “modeling studio” to
16 the shared living quarters where all the women and girls being sexually exploited by Mr.
17 McDaniels were forced to live on Sundays, and sometimes not at all. The women and girls in
18 the shared living quarters were permitted few personal items, except for lingerie.

19 172. Ms. Williams was able to break free from Mr. McDaniels, but then ended up
20 stripping at a strip club chain in Houston, Texas.

21 173. The Houston strip club generally encouraged prostitution and sex trafficking
22 within the clubs.

23 174. While Ms. Williams was at the Houston strip club, the club knew she was a
24

1 victim of human trafficking and sold her for sex in the club.

2 175. Ms. Williams was introduced to a very violent trafficker through the Houston
3 strip club.

4 176. While under the sexual servitude to the violent trafficker, Ms. Williams began
5 browsing classified ads in an effort to escape.

6 177. In or around early 2006, Ms. Williams responded to an advertisement for a job
7 posted by Tarnita Woodard, an employee of Jamal Rashid, also known as “Mally Mall.”

8 178. Mr. Rashid owned many escort businesses, some of them shell corporations to
9 disguise his escort services, including Defendants Exclusive Beauty Lounge, LLC, E.P.
10 Sanctuary, First Investment Property LLC, V.I.P. Entertainment, LLC, and listed Ms. Woodard
11 as the registered owner of many of these companies.

12 179. Mr. Rashid’s other corporations received profits from his escort companies. On
13 information and belief, Mr. Rashid’s other businesses that benefited from his sex trafficking
14 business include Defendants PF Social Media Management, LLC, Mally Mall Music, LLC,
15 Future Music, LLC, Blu Magic Music, LLC,; MP3 Productions, Inc., and MMM Productions,
16 Inc.

17 180. Ms. Williams was hired to work for one of Mr. Rashid’s companies, V.I.P.
18 Entertainment, LLC, which was a licensed escort business in Las Vegas.

19 181. Mr. Rashid had three offices in Nevada over a fifteen-year period, all registered
20 to his various entertainment businesses.

21 182. Mr. Rashid, who has ties to organized crime, was on the Las Vegas
22 Metropolitan Police Department payroll as an informant, and also paid large sums of money
23 to the police.

24

1 183. In 2014, the FBI raided Mr. Rashid’s home during the corruption investigation
2 referenced above. In 2019, the FBI again raided Mr. Rashid’s home, in an apparent sex
3 trafficking and animal trafficking investigation.

4 184. The City of Las Vegas knew Mr. Rashid was an active sex trafficker.

5 185. Ms. Williams was required to obtain a work card from the Clark County
6 Sheriff’s Office by one of Mr. Rashid’s escort agencies.

7 186. V.I.P. Entertainment enticed Ms. Williams to travel across state lines from
8 Texas to Las Vegas, Nevada to be sex trafficked, under the guise of upscale escorting, because
9 the demand for prostitution was so high in Nevada.

10 187. Mr. Rashid used fraud to entice the women working for him into thinking that
11 the work performed was glamorous, and that the women were like “Playboy Bunnies,” and he
12 was like Hugh Hefner.

13 188. In the beginning, Mr. Rashid allowed Ms. Williams to keep 30% of any monies
14 earned from the escort services and required her to give him the remaining 70%.

15 189. Eventually, Mr. Rashid designated Ms. Williams as a “priority girl,” and forced
16 her to give him 100% of what she earned.

17 190. He claimed this was necessary to take care of Ms. Williams’s living expenses.

18 191. Mr. Rashid was entering the music industry, and he was recognized as a major
19 pimp in the illegal sex trade in Las Vegas, Nevada, where he began sending Ms. Williams in
20 the fall of 2006.

21 192. Mr. Rashid and his employees began to control every aspect of Ms. Williams’s
22 money, from booking her rooms when she traveled and providing her a small allowance to cover
23 food and a hotel while she was traveling for commercial sex acts outside Nevada, to controlling
24

1 what she was allowed to wear.

2 193. Ms. Williams was required to go to whatever house or hotel Mr. Rashid
3 provided and sleep. She had to be hair and make-up ready by 3:00pm.

4 194. Her shifts were 4:00pm-12:00am (swing) and 12:00-8:00am (grave). If sex
5 buyers were on cocaine, Ms. Williams would be required to continue into the day. She would
6 have to remain with the sex buyer until she was relieved.

7 195. Ms. Williams was not allowed to leave the sex buyer, even if she felt her life
8 was in danger. She was not allowed to leave the room, until she was cleared by one of the
9 managers/ assistant traffickers.

10 196. Ms. Williams was forced to service sex buyers who abused her in the past. In
11 one case, Ms. Williams stated: "I don't want to see him; he is a pervert," and was not permitted
12 to decline.

13 197. To be cleared to leave the sex buyer, Ms. Williams had to tell the manager, in
14 front of the sex buyer, "I am leaving," and disclose the full amount of money she had received,
15 which meant saying aloud if she had received a tip, which the manager would take as well.

16 198. Ms. Williams was sometimes kicked out of buildings by security personnel,
17 who would require her to use a different entrance, even if that would jeopardize her safety.
18 Ms. Williams was sometimes arrested for trespassing.

19 199. The managers would yell at Ms. Williams. If managers decided Ms. Williams
20 and the other exploited women and girls were not being sufficiently subservient, they would
21 not eat well.

22 200. Ms. Williams would often get home at 9:00am, and have six hours to sleep, eat,
23 run errands, and then be hair and makeup-ready by 3:00pm.

24

1 201. The sex trafficking ring guised as a legal escort service was successfully and
2 strategically planted in Las Vegas and Clark County to intercept sex tourists planning to travel
3 to the nearby cities of Pahrump or Crystal where the closest legal brothels were located.

4 202. The escort service trafficked Ms. Williams by plane from Las Vegas, Nevada
5 to perform sex acts for money in large cities such as Dallas, Los Angeles, Chicago, and Boston.

6 203. Most of the Las Vegas sex buyers were under the misconception that
7 prostitution was legal in all of Nevada, including Las Vegas and Clark County, and the escort
8 service took advantage of this misconception.

9 204. Ms. Williams most frequently interacted with sex buyers who traveled across
10 state lines to Nevada for the sole purpose of purchasing sex, whether it was for a newly
11 divorced party, a bachelor party, or a corporate CEO wishing to privately cheat on his wife.

12 205. Ms. Williams knew numerous women in the sex industry who were trafficked
13 and sexually exploited in the legal brothels.

14 206. Ms. Williams was arrested as a result of being trafficked for purposes of
15 prostitution.

16 207. When Ms. Williams was on probation for her prostitution charges, Mr. Rashid
17 coerced her to violate her probation by continuing to sell sex, by assuring her that he had a
18 “dream team” of lawyers that could get them out of anything.

19 208. Mr. Rashid used the money from sex trafficking the women to pay for his music
20 production. Mr. Rashid has worked for Grammy award-winning artists, and lived in a multi-
21 million-dollar home in Encino, California.

22 209. Mr. Rashid was sentenced to prison in May 2021 for unlawfully operating a
23 prostitution business.

24

1 210. Eventually, Ms. Williams was arrested by Chicago police while being sex
2 trafficked by Mr. Rashid’s company. Ultimately, Ms. Williams served 13 months in jail.

3 211. After serving her time, Mr. Rashid tried to recruit Ms. Williams to return back
4 to his escort business.

5 212. Ms. Williams moved to Los Angeles, California, where Mr. Rashid had
6 multiple community apartments for the women and girls who worked for him to use while they
7 were traveling to be bought for sex from sex buyers or for escort services.

8 213. While in Los Angeles, California, Mr. Rashid forced Ms. Williams to perform
9 oral sex on him.

10 214. While working for Mr. Rashid, Ms. Williams understood that she belonged to
11 “the Game” and/or the “Pimp and Ho” subculture. Ms. Williams was threatened and
12 brainwashed into believing that if she were to prostitute as a “free agent” or without the
13 representation of a trafficker that she would be opening herself up to be assaulted or robbed by
14 sex buyers, or to worse treatment by another sex trafficker.

15 215. Mr. Rashid tore down Ms. Williams’s identity and self-worth so much that he
16 made her believe the only “job” she would ever be able to obtain was one where she sold sexual
17 acts to sex buyers.

18 216. Eventually after going back and forth between being sex trafficked by Mr.
19 Rashid and working in the strip clubs, Ms. Williams met her final trafficker through a contact
20 from Moonshine and Candy Apple Girls escort agency. Her final trafficker trafficked Ms.
21 Williams through the strip clubs again, including the Sapphire in Las Vegas.

22 217. Ms. Williams’s final sex trafficker came to her with empty promises of love,
23 and of retiring her from being a sex trafficked woman.

24

1 218. Ms. Williams became frightened when she realized her final sex trafficker was
2 extremely abusive.

3 219. When Ms. Williams would try to escape from him, he would severely
4 physically assault her.

5 220. Ms. Williams escaped from her final sex trafficker in 2017.

6 221. After Ms. Williams escaped she moved to a condominium in Las Vegas that
7 lacked security. One morning Ms. Williams's final sex trafficker came to her doorstep with a
8 bouquet of roses and tried to kill her.

9 222. After almost losing her life, Ms. Williams was able to escape the grip of sex
10 traffickers.⁸²

11 223. Though Ms. Williams suffers from post-traumatic stress disorder from her near-
12 death assault when her sex trafficker attempted to kill her, she suffers more from the flashbacks
13 of her memories of being sold and exploited by sex buyers.

14 224. To this day, Ms. Williams still suffers from the trauma of being sex trafficked.
15 She cannot enjoy the relaxation of a normal vacation with her family because of the violence
16 she experienced in hotel rooms across this country, the majority of which occurred in Las
17 Vegas.

18 225. Nevada was a regular location for Ms. Williams to be sex trafficked. No matter
19 where her traffickers would take her, they would always return to Nevada to sell Ms. Williams,
20
21

22 ⁸² On May 22, 2018, Tyree Wright was sentenced to serve nine and a half (9 ½) years in prison for his charges of
23 sex-trafficking, second degree kidnapping, and battery with use of a deadly weapon resulting in substantial bodily
24 harm. Brenda Yahm & Adam Herbets, *Valley victim confronts abusive pimp during his sentencing*, FOX 5 KVVU
TV (May 22, 2018), https://www.fox5vegas.com/news/valley-victim-confronts-abusive-pimp-during-hissentencing/article_ec3c3c29-9355-5664-b58d-3b50b1e5ed69.html.

1 and others similarly situated to her, because Nevada is the state where there was and is the
2 greatest demand for prostitution, whether legal or illegal.

3 *Plaintiff Jane Doe #1*

4 226. Plaintiff Jane Doe #1 was sex trafficked in Nevada from 2013 to 2018.

5 227. Jane Doe #1 experienced homelessness, being placed in the foster care system,
6 and sexual abuse as a child, including statutory rape by a man 13 years older than her, who left
7 her pregnant at the age of 15, while a ward of the court.

8 228. The abuser used pornography to groom Jane Doe #1 from age 14, including the
9 2005 film, "Boss'n up." The abuser also created pornography of Jane Doe.

10 229. At 18, Jane Doe #1 moved in with the abuser, and within six months had entered
11 a domestic violence shelter with her child, pregnant with her second child. Thereafter, Jane
12 Doe #1 was chronically homeless, going from shelter to shelter and program to program while
13 fighting her abuser for child custody.

14 230. Due to Jane Doe #1 being sex trafficked and her absence at the family court
15 date, the custody judgment went into default and the abuser gained full custody of their
16 children. That abuser made false allegations against Jane Doe #1 in family court, causing her
17 to lose her welfare income, subsidized housing, and financial aid for college. He retains
18 custody of their children.

19 231. Jane Doe #1 was thereafter introduced to prostitution by a family member who
20 induced her to travel to Las Vegas, promising that it would be a way to quickly make money
21 for a lawyer and Jane Doe #1's other emergency needs.

22 232. That family member was also being sex trafficked by multiple pimps, and
23 married one of them.

24

1 233. Jane Doe #1 was introduced to at least three other pimps in 24 hours, who all
2 sex trafficked her.

3 234. Paying cash to multiple pimps/traffickers at once violates the “rules” of
4 pimping, and when some of the pimp/traffickers found out, they brutally beat both Jane Doe
5 #1 and her aunt.

6 235. The sex trafficker that Jane Doe #1 ended up with was a guerilla pimp, that is,
7 one that uses extreme violence, including torture, to force persons under his control to engage
8 in prostitution.

9 236. Jane Doe #1 was sex trafficked by the guerilla pimp in Las Vegas street
10 prostitution.

11 237. Jane Doe #1 was subjected to extreme violence, as well as starvation and
12 confinement – forms of torture – by the guerilla pimp, who was also a gang member, who was
13 prostituting her.

14 238. Jane Doe #1 escaped the guerilla pimp and was then sex trafficked by a
15 “Romeo” pimp – an exploiter who coerces through romance, affection, instilling a sense of
16 family obligation, and other forms of predominantly psychological manipulation.

17 239. Jane Doe #1 was subjected to physical violence by the “Romeo” pimp, Khalieff
18 “Leef” Wilson, on at least one occasion, for breaking one of his marijuana drug “rules.”

19 240. The “Romeo” pimp renamed Jane Doe #1 and in addition to Nevada, required
20 her to travel throughout the United States to prostitute for him in New York, New Jersey,
21 Colorado, Oregon, Texas, New Mexico, California, Oklahoma, Arizona, Georgia– much of it
22 with racial overtones.

23

24

1 241. Mr. Wilson required this travel to maximize his profits from Jane Doe #1's
2 prostitution and to reduce the chances that they would be arrested.

3 242. Jane Doe #1 was sex trafficked in multiple venues, including casinos, executive
4 offices, truck stops, brothels, agencies, outcall/incall to sex buyers' preferred locations, hotels,
5 underground business pubs, restaurants, and massage parlors.

6 243. Jane Doe #1 frequently encountered violence from sex buyers, including a sex
7 buyer who threatened her with a gun, a couple that decided they wanted their money back after
8 Jane Doe #1 performed sexual services on them, and a sex buyer who discussed a serial killer
9 of prostituted women in Albuquerque, while Jane Doe #1 was servicing him at the
10 Albuquerque airport hotel.

11 244. Mr. Wilson was eventually arrested for sex trafficking a minor for prostitution,
12 convicted, and sentenced to prison.

13 245. Jane Doe #1 remained under Mr. Wilson's control even while Mr. Wilson was
14 in prison, continuing to give him part of the money she made through prostitution, until 2015.

15 246. While Mr. Wilson was in prison, Jane Doe #1 engaged in prostitution through
16 escort agencies that would arrange her hotels and travel, screen her calls for sex buyer
17 bookings, and give information on locations, in exchange for fees and splits of the money Jane
18 Doe #1 would make.

19 247. Jane Doe #1 also fell under the control of additional madam pimp, Nicole
20 Flowers. Ms. Flowers was associated with a travel agency that posted ads on craigslist to
21 attract escorts. Ms. Flowers primarily relied on psychological means of coercion, including
22 engaging in prostitution herself, and took portions of the money that Jane Doe #1 was not giving
23 to Mr. Wilson.

24

1 248. If Ms. Flowers provided transportation, room, supplies, photos, call screening,
2 and advertisements for two weeks, Jane Doe #1 was required to work two weeks in the state of
3 Ms. Flowers' choosing.

4 249. Jane Doe #1 became engaged in legal brothel prostitution at the Chicken Ranch
5 while being pimped by Mr. Wilson and Ms. Flowers.

6 250. Jane Doe #1 was required to obtain a Sheriff's work card from the Nye County
7 Sheriff's Office to be prostituted at the Chicken Ranch.

8 251. The Sheriff's office did not ask for a government ID or attempt to verify Jane
9 Doe #1's age or consent, nor did it attempt to determine whether she was under the control of
10 a pimp/trafficker.

11 252. Jane Doe #1 did not have a government ID when she obtained her Sheriff's work
12 card to work in the legal brothel. One of Jane Doe #1's earlier pimp/traffickers took away her
13 identification as a scare tactic, and to keep her from leaving, threatening to locate and harm
14 her children and family.

15 253. The Sheriff's work card did not display Jane Doe #1's age.

16 254. The brothel did not attempt to verify Jane Doe #1's age or consent, nor did it
17 attempt to determine whether she was under the control of a pimp/trafficker.

18 255. The brothel was aware that many women being prostituted at the brothel were
19 under the control of pimps/traffickers.

20 256. Jane Doe #1 witnessed pimps/traffickers at the brothel. She also witnessed
21 recruitment at the brothel.

22 257. The brothel was aware that many persons being prostituted at the brothel were
23 under 21 years old.

24

1 258. Jane Doe #1 witnessed minors being prostituted at the brothel, including minors
2 who had not yet reached their teens.

3 259. Jane Doe #1 was not permitted to have visitors at the brothel, unless they were
4 sex buyers.

5 260. The brothel arranged and controlled arrival and departure times for the
6 prostituted women.

7 261. Jane Doe #1 was picked up by the brothel's transportation system in Las Vegas,
8 and transported to Pahrump, Nevada.

9 262. Sex buyers at the brothel paid via the brothel's website, or the ATM/card reader
10 at the brothel itself. The brothel then paid Jane Doe #1, after taking out various amounts, at
11 the end of the two-week period.

12 263. Jane Doe #1 was required to give the brothel 50% of what she earned.

13 264. Jane Doe #1 was also required to pay the brothel for room and board, roughly
14 \$250 per week, as well as \$50 each way for any transportation to or from the brothel.

15 265. Jane Doe #1 was required to pay the brothel around \$120 monthly for the
16 weekly medical exams.

17 266. Jane Doe #1 gave any remaining money to her two pimps, Khalieff Wilson and
18 Nicole Flowers.

19 267. Jane Doe #1 was not permitted to leave the brothel during her two-week shifts,
20 even to run errands; women prostituted in the brothel were locked inside, and did not have
21 keys, and had to sign out before leaving the brothel at the end of a two-week shift (unless
22 extending her contract for another two weeks).

23 268. Jane Doe #1 was not permitted to leave the brothel if she owed the brothel
24

1 money, which happened at least one time. A friend from the same brothel paid the bill for her
2 and they left the brothel together to prostitute elsewhere in Nevada, and then in the friend's
3 Oklahoma hometown.

4 269. Jane Doe #1 was subjected to debt bondage while being prostituted at the
5 Chicken Ranch, until 2018.

6 270. Jane Doe #1 was subjected to Ms. Flowers' control, continuing to engage in
7 prostitution and give Ms. Flowers her earnings, until 2018 in Nevada and 2019 in California.

8 271. To this day, Jane Doe #1 still suffers from the trauma and other effects of being
9 sex trafficked, including post-traumatic stress disorder, and depression, low self-esteem,
10 possessing a criminal record, chronic homelessness, difficulty finding employment, and loss
11 of custody for her children.

12 *Plaintiff Jane Doe #2*

13 272. Plaintiff Jane Doe #2 was sex trafficked in Nevada from March 2017 to
14 September 2018.

15 273. Jane Doe #2 experienced bullying, sexual harassment and assault, and
16 grooming as a minor. Sex traffickers groomed Jane Doe #2 through social media apps and
17 advertised her for sex on platforms such Backpage.com, before she turned eighteen.

18 274. Jane Doe #2 was manipulated and coerced into prostitution by a series of
19 boyfriend/"Romeo" pimps, who used psychological tactics as well as violence to control Jane
20 Doe #2.

21 275. Jane Doe #2 was trafficked for sex by various pimps/sex traffickers in the
22 Houston area after she turned eighteen. Eventually, Jane Doe #2 was induced to travel to Las
23 Vegas on pretext of taking a short vacation in 2017. Once in Las Vegas, the pimps/sex
24

1 traffickers pressured Jane Doe #2 to engage in stripping, claiming that the women who did so
2 led glamorous lives and never had to do “extras.”⁸³

3 276. One of the Las Vegas pimps/sex traffickers, who trafficked Jane Doe #2 in the
4 Sapphire and Hustler, was extremely sexually, psychologically, and physically abusive to Jane
5 Doe #2.

6 277. Sapphire Gentlemen’s Club (Sapphire) bills itself as the world’s largest strip
7 club, with over 70,000 square feet.⁸⁴ Sapphire contains many private booths and private rooms,
8 including skyboxes, which were especially expensive upstairs rooms. When Jane Doe #2 was
9 there, Sapphire could have between 100 and 500 girls a night there as dancers.

10 278. Larry Flynt’s Hustler Club (Hustler), one of a chain of clubs founded by the
11 pornographer, is a strip club which similarly has private rooms called skyboxes and “Honey
12 Suites.”

13 279. Plaintiff Jane Doe #2’s pimps/sex traffickers forced and coerced her to work at
14 Sapphire from December 2017 to September 2018, and at Hustler from May 2017 to August
15 2018.

16 280. Jane Doe #2 was required to get a work card from the Clark County Sheriff’s
17 Office.

18 281. Jane Doe #2’s sex traffickers forced her to assume the identity of an older
19 woman (due to regulations requiring dancers to be twenty-one) to obtain the work card, and
20 used the threat of being detected and prosecuted to further control Jane Doe #2.

21 282. Jane Doe #2’s pimps/sex traffickers confiscated her actual identification
22

23 ⁸³ “Extras” refers to commercial sex acts beyond dancing.

24 ⁸⁴ SAPPHIRE GENTLEMEN’S CLUB, https://www.sapphireLasvegas.com/sapphire_club_features/ (last visited Nov. 10, 2021).

1 documents, preventing her from leaving Nevada without their permission.

2 283. Jane Doe #2’s sex traffickers treated their identity theft crime as a “favor” to
 3 Jane Doe #2, for which she was indefinitely in their debt, and they expected her to make
 4 millions of dollars for them in return.

5 284. When Jane Doe #2 obtained her work card, she was not asked by the Sheriff’s
 6 office whether she was being trafficked, was under a pimp’s control, or whether she was
 7 consenting.

8 285. Sapphire and Hustler were open 24 hours a day, seven days a week, while Jane
 9 Doe #2 was sex trafficked through them.

10 286. Sapphire and Hustler had back door entrances for celebrities and others who did
 11 not want to be seen. Sapphire and Hustler typically subjected persons dancing and being
 12 prostituted from their establishments to a number of charges:

Type	Typical Amount	Notes
Entry fee/house fee/tipout	\$80-\$200 per night	Based on arrival time.
Exempt from dancing on the stage	\$50 per night	Stage is the least profitable (compared to lap dances and private VIP rooms).
Leaving early	\$50-\$100 per night	
Suggested tip for house mom	\$10-\$40 per night	If you did not tip the house mom, she might not help you in an emergency or with getting food if you were unable to purchase any.

1			The house mom provided snacks, sometimes
2			meals, and other services.
3	Locker rent	\$80-\$250 per	If dancers did not rent lockers, they might
4		month	not be able to access one at all, and risked
5			their money and property being stolen.
6	Club cash cage	2-3% of	If a customer paid with card instead of cash,
7		transaction amount	you would get a ticket for the time and
8			amount, and then cash cage would convert it
9			into cash.
10	Club ATM	\$25 per use, on	The ATM fees fluctuated.
11		average	
12	Makeup, shoes,	\$25 for stockings	Must be replaced almost daily. Could easily
13	clothes at club's store		spend hundreds of dollars on other items.
14	Buy food	\$20-\$30 per night	No discounts for dancers.
15	Buy drinks	\$25-\$100 per night	Drinks were included with private rooms.
16			But many dancers relied on daily alcohol use
17			to get through their shifts.
18	Missing stage call	\$50 per instance	Usually have a few minutes to make it, must
19			run to avoid the missed call. Can miss and be
20			charged multiple times in a night.
21	House/club deduction	20-28% of amount	This is the percent the club automatically
22	from private/VIP		takes from VIP and other private areas.
23	rooms		
24			

1	Suggested DJ tip	\$15-\$25 per night	If you don't tip the DJ, he might not play
2			good music for you or encourage patrons to
3			tip you during songs.
4	Suggested tip wait	\$20-\$100 per night	
5	staff, bottle service,		
6	bartenders, barbacks		
7	Suggested tip host and	\$40-\$200 per night	Tips for introducing dancers to customers,
8	floor host		depending on how much time the customer
9			spent.
10	Suggested tip for VIP	\$20-\$50 per night	This includes the front desk; check in is
11	staff		required
12	Suggested tip for	\$20-\$50 per night	Managers assist if VIP rooms are crowded
13	managers		
14	Tip security and	\$10-\$30 per night	Some will not even attempt to keep you safe
15	bouncers		if you don't.
16	Tip restroom attendant	\$5-\$10 per use	

17 287. As a consequence, dancers were often in debt to Sapphire and Hustler.

18 288. Hustler provided a document detailing the amount they took from VIP room
19 charges.

20 289. Sapphire provided no document detailing these expectations or charges.

21 290. Plaintiff Jane #2 was subjected to fees, fines, and charges as described above
22 while at Sapphire and Hustler.

23 291. Jane Doe #2 was required to sign in and show her work card each time she
24

1 worked at Sapphire and Hustler. She was also required to pay outstanding balances to the
2 clubs at this point.

3 292. Sapphire and Hustler expected Jane Doe #2 to work 6 hours a night if she
4 wanted to avoid the fee for leaving early.

5 293. Jane Doe #2 typically worked 8 to 12 hours in a shift, six to seven days a week.
6 Once clubs began remaining open for 24 hours, Jane Doe #2 consequently sometimes worked
7 15 to 24 hour shifts.

8 294. When doing stage dances, Jane Doe #2 could make no money or several
9 hundred dollars.

10 295. Jane Doe #2, like the other dancers, made most of her money on the floor and
11 in the private VIP rooms.

12 296. At Hustler, the smallest VIP room was cost \$140 for fifteen minutes, of which
13 the club would automatically take \$40.

14 297. At Sapphire, the smallest VIP room cost \$150-\$200 for fifteen minutes, of
15 which the club would automatically take at least \$50.

16 298. At both Sapphire and Hustler, private rooms would include a table and chairs,
17 and sometimes booths, couches, and/or a bed-like piece of furniture.

18 299. At Sapphire, the most expensive VIP rooms were called skyboxes, which could
19 be \$600 to \$1200 dollars for thirty minutes. At Hustler, skyboxes could range from \$500 to
20 \$1000 for thirty minutes. At Hustler, some private rooms were \$1000 to \$3,000 per hour. At
21 Sapphire, some private rooms were \$1000 to \$5,000 per hour.

22 300. Dancers who engaged in sex for money on the premises were expected to pay
23 Sapphire at least a 40% tip (beyond those described in the chart above), or they could be fired
24

1 or suspended, and also put on a blacklist (this meant not being selected for skyboxes or other
2 appointments with high-paying sex buyers).

3 301. On a busy night, where Jane Doe #2 worked 10 hours or more, Sapphire and
4 Hustler would sometimes take around or even more than half of the money she made.

5 302. On a slow night, Jane Doe #2 might make only \$50 to \$100, and therefore not
6 even have enough to cover her house fee.

7 303. Plaintiff Jane Doe #2 was usually in debt to Sapphire and Hustler.

8 304. After she paid Sapphire and Hustler, Plaintiff Jane Doe #2 was then required to
9 turn over her remaining money to her sex traffickers.

10 305. In order to make sufficient money, Jane Doe #2 and the other dancers engaged
11 in commercial sex acts with strip club patrons in the strip clubs' VIP or private rooms.

12 306. Sex buyers, many of whom were wealthy and sometimes famous, were
13 degrading and violent, and many of them sexually assaulted Jane Doe #2 often at both Sapphire
14 and Hustler.

15 307. After sex buyers raped the dancers, the clubs, knowing this, would still insist
16 on collecting tips from the dancers.

17 308. Dancers, including Jane Doe #2 did outcalls from Sapphire and Hustler to hotels
18 and casinos.

19 309. Sometimes Sapphire and Hustler wanted extra payment when dancers did
20 outcalls.

21 310. Las Vegas Metropolitan Police Department officers would sometimes arrest
22 dancers for outcalls after buying sex from them.

23 311. Sapphire and Hustler had video and audio recording devices in each area of the
24

1 clubs, including private rooms.

2 312. Sapphire and Hustler could see and hear all that occurred in their private rooms.

3 313. Pimps/sex traffickers would frequent Sapphire and Hustler, with the intent of
4 monitoring dancers they controlled, and also recruiting others.

5 314. Staff at Sapphire and Hustler would see pimps/sex traffickers pick up or drop
6 off girls, could overhear girls' phone calls to their pimps/sex traffickers (especially when they
7 needed money to pay off debts to the strip clubs), and could also see pimps/sex traffickers'
8 tattoos/brands on girls.

9 315. Dancers at Sapphire and Hustler commonly suffered from alcoholism and other
10 substance abuse in order to get through their shifts at the clubs.

11 316. Jane Doe #2 struggled with alcohol addiction and sometimes drug abuse at
12 Sapphire and Hustler, and was often intoxicated and incapacitated.

13 317. Jane Doe #2 suffered from an eating disorder while at Sapphire and Hustler,
14 and was visibly underweight, malnourished, bruised, and scarred.

15 318. Plaintiff Jane Doe #2 engaged in commercial sex acts at Sapphire and Hustler,
16 induced through force, fraud, and coercion from her pimps/sex traffickers, and through fraud
17 and coercion from Sapphire and Hustler.

18 319. To this day, Jane Doe #2 still suffers from the trauma and other effects of being
19 sex trafficked, including post-traumatic stress disorder, depression, low self-esteem, anxiety
20 and fear regarding her sex traffickers – most of whom remain at large.

21 320. As persons recently sex trafficked within Nevada, Plaintiffs are appropriate
22 persons to assert third-party standing on behalf of people currently being sex trafficked within
23 legal brothels in Nevada jurisdictions which permit prostitution, and within legal escort
24

1 agencies and legal strip clubs in Nevada jurisdictions that do not permit prostitution.

2 321. Persons currently being sex trafficked within Nevada, being in a condition of
3 slavery or involuntary servitude, are thereby unable to enforce their rights and seek redress
4 apart from the third party standing which Plaintiffs assert.

5 **COUNT I**
6 **VIOLATING THE THIRTEENTH AMENDMENT BAN ON SLAVERY**

7 322. Plaintiffs reallege and incorporate by reference all prior and subsequent
8 paragraphs as if fully incorporated herein.

9 323. Plaintiffs assert third party standing on behalf of people currently being sex
10 trafficked within legal brothels in Nevada jurisdictions which permit prostitution, and within
11 legal escort agencies and legal strip clubs in Nevada jurisdictions that do not permit legal
12 prostitution, as to the rights violations described below.

13 324. The Thirteenth Amendment to the United States Constitution guarantees
14 Plaintiffs the freedom from enslavement and involuntary servitude, which prohibits
15 Defendants both from directly subjecting Plaintiffs to slavery or involuntary servitude, and
16 from providing legal cover to, or otherwise enabling, any system of slavery or involuntary
17 servitude.

18 325. Sex Industry Defendants directly subjected Plaintiffs to slavery and involuntary
19 servitude in the form of sex trafficking.

20 326. State and City Defendants provided legal cover for the Nevada sex trade,
21 enabling the system through which the Plaintiffs were subjected to slavery and involuntary
22 servitude in the form of sex trafficking.

23 327. Defendants' conduct has caused Plaintiffs serious harm, including physical,
24

1 brothels in Nevada jurisdictions which permit prostitution, and within legal escort agencies in
2 Nevada jurisdictions that do not permit prostitution, with the following relief:

3 A. A declaratory judgment as currently implemented and enforced by state and local
4 practices and policies, the following statutes are unconstitutional: NEV. REV. STAT. §
5 244.345 (as to permitting prostitution in certain counties, escorting, and entertainment
6 by referral service); NEV. REV. STAT. § 244.335(2) (as to permitting prostitution in
7 certain counties, escorting, and entertainment by referral service); NEV. ADMIN. CODE
8 § 441A.800; and the brothel licensing ordinances of Elko, Lander, Lyon, Mineral, Nye,
9 Storey, and White Pine Counties, to the extent that they permit prostitution: ELKO,
10 NEV., COUNTY CODE, "Sexually Oriented Businesses and Employee Licensing
11 Chapter," §6-11 (2020); LANDER, NEV., COUNTY CODE, "Prostitution," §5.16 (2020);
12 LYON, NEV., COUNTY CODE, "Lyon County Brothel Ordinance," §5.03 (2020);
13 MINERAL, NEV., COUNTY CODE, "Prostitution," §5.12 (2019); NYE, NEV., COUNTY
14 CODE, "Prostitution," §9.20 (2020); STOREY, NEV., COUNTY CODE, "Brothels," §5.16
15 (2015); and WHITE PINE, NEV., COUNTY CODE, "Prostitution," §10.36 (2021).

16 B. An injunction preventing all Defendants from implementing or enforcing: NEV. REV.
17 STAT. § 244.345 (as to permitting prostitution in certain counties, escorting, and
18 entertainment by referral service); NEV. REV. STAT. § 244.335(2) (as to permitting
19 prostitution in certain counties, escorting, and entertainment by referral service); §
20 NEV. ADMIN. CODE § 441A.800; and the brothel licensing ordinances of Elko, Lander,
21 Lyon, Mineral, Nye, Storey, and White Pine counties, to the extent that they permit
22 prostitution; and from any form of perpetrating or financially benefiting from violations
23 of federal anti-trafficking laws.

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- 1 C. Nominal damages against the State Defendants;
- 2 D. Compensatory, consequential, general, and punitive damages against the City and Sex
3 Industry Defendants in an amount to be determined at trial;
- 4 E. Restitution and disgorgement of all profits and unjust enrichment obtained as a result
5 of Defendants' unlawful conduct;
- 6 F. Plaintiffs' reasonable attorneys' fees, costs, and other costs and disbursements in this
7 action under 42 U.S.C. § 1988; and
- 8 G. All other further relief to which Plaintiffs may be entitled.

9 DATED this 10th day of November, 2021.

10
11 /s/ Jason D. Guinasso
12 Jason D. Guinasso (SBN# 8478)
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Attorneys for Plaintiffs*

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CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of Hutchison & Steffen, PLLC, over the age of 21 years, and not a party to nor interested in the within action. I certify that on this date, the foregoing **FIRST AMENDED COMPLAINT**, was electronically filed with the United States District Court. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

Defendant

Steve Sisolak
Governor of Nevada

represented by **Gregory Louis Zunino**
Nevada State Attorney General's Office
100 N Carson Street Carson City, NV
89701 775-684-1137 Fax: 775-684-1108
Email: GZunino@ag.nv.gov,
sgeyer@ag.nv.gov

Defendant

Aaron Ford
Attorney General of Nevada

represented by **Gregory Louis Zunino**
(See above for address)

Defendant

The City of Las Vegas

represented by **Jeffrey L Galliher**
LAS VEGAS CITY ATTORNEY'S
OFFICE
495 S. MAIN STREET, 6TH FLR
Las Vegas, NV 89101 702-229-6629
Fax: 702-386-1749
Email: jgalliher@lasvegasnevada.gov,
ccorwin@lasvegasnevada.gov,
ckelly@lasvegasnevada.gov,
jandrews@lasvegasnevada.gov,
khansen@lasvegasnevada.gov

1 **Defendant**
2 **Clark County**

represented by **Joel K Browning**
Clark County District Attorney Civil
Division
500 S. Grand Central Pkwy., #5075
Las Vegas, NV 89155-2215
702-455-4761
Fax: 702-382-5178
Email:
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christine.wirt@clarkcountyda.com,
Tawana.Thomas@clarkcountyda.com

7 **Defendant**
8 **Nye County**

represented by **Brent L Ryman Erickson**
Thorpe & Swainston, Ltd.
99 W. Arroyo
P.O. Box 3559
Reno, NV 89505
775-786-3930
Fax: 775-786-4160
Email: bryman@etsreno.com,
daguirre@etsreno.com,
liligouri@etsreno.com

14 Pursuant to FRCP 5(b), I certify that I am an employee of Hutchison & Steffen, PLLC,
15 over the age of 21 years, and not a party to nor interested in the within action. I certify that on
16 this date, the foregoing **FIRST AMENDED COMPLAINT**, was electronically filed with the
17 United States District Court. Service by traditional means through a process server of the
18 foregoing document shall be made in accordance as follows:

19 **Defendant**
20 **Western Best, Inc. d/b/a Chicken Ranch**

21 **Defendant**
Western Best LLC

22 **Defendant**
23 **Jamal Rashid**

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Defendant

Mally Mall Music LLC

Defendant

Future Music, LLC

Defendant

PF Social Media Management, LLC

Defendant

E.P. Sanctuary Blue Magic Music, LLC

Defendant

Exclusive Beauty Lounge, LLC

Defendant

First Investment Property LLC

Defendant

V.I.P. Entertainment, LLC

Defendant

MP3 Productions, Inc.

Defendant

MMM Productions, Inc

Defendant

SHAC, LLC d/b/a Sapphire Gentlemen’s Club and/or Sapphire

Defendant

SHAC MT, LLC

Defendant

Las Vegas Bistro, LLC d/b/a Larry Flynt’s Hustler Club

DATED this 10th day of November, 2021.

/s/ Bernadette Francis