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

2011 JUN 22 PM 3: 21
ALAN GLOVER
BY *[Signature]*
DEPUTY

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

10 **JED MARGOLIN, an individual,**
11 **Plaintiff,**

12 vs.

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

24 **Defendants.**

Case No.: 090C00579 1B

Dept. No.: 1

**OPPOSITION TO MOTION TO
DISMISS AND COUNTERMOTIONS
TO STRIKE AND FOR LEAVE TO
AMEND THE COMPLAINT**

25 COMES NOW Plaintiff Jed Margolin and hereby files this opposition to Defendant
26 Reza Zandian's ("Zandian") motion to dismiss on a special appearance and Plaintiff's
27 counter motions to strike the motion to dismiss and in the alternative for leave to amend the
28 complaint. This opposition and counter motions are based on the following Memorandum of
Points and Authorities and all pleadings, motions, and papers on file herein.

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///

1 MEMORANDUM OF POINTS AND AUTHORITIES

2 I. FACTUAL BACKGROUND

3 Plaintiff Jed Margolin is the named inventor on numerous patents and patent
4 applications, including United States Patent No. 5,566,073 ("the '073 Patent"), United States
5 Patent No. 5,904,724 ("the '724 Patent"), United States Patent No. 5,978,488 ("the '488
6 Patent") and United States Patent No. 6,377,436 ("the '436 Patent") (collectively "the
7 Patents"). See Complaint, ¶ 9. Mr. Margolin is the legal owner and owner of record for the
8 '488 and '436 Patents, and has never assigned those patents. *Id.*, ¶ 10. In 2004, Mr. Margolin
9 granted to Optima Technology Group ("OTG"), a Cayman Islands Corporation specializing in
10 aerospace technology, a Power of Attorney regarding the '073 and '724 Patents. *Id.*, ¶ 11.
11 Subsequently, Mr. Margolin assigned the '073 and '724 Patents to OTG. *Id.* ¶ 13. In
12 exchange for the Power of Attorney and later Assignment, OTG agreed to pay Mr. Margolin
13 royalties based on OTG's licensing of the '073 and '724 Patents. *Id.*

14 In May 2006, OTG and Mr. Margolin licensed the '073 and '724 Patents to Geneva
15 Aerospace, Inc., and Mr. Margolin received a royalty payment pursuant to the royalty
16 agreement between Mr. Margolin and OTG. *Id.*, ¶ 12. In about October 2007, OTG licensed
17 the '073 Patent to Honeywell International, Inc., and Mr. Margolin received a royalty payment
18 pursuant to the royalty agreement between Mr. Margolin and OTG. *Id.*, ¶ 14.

19 On about December 5, 2007, Defendant Zandian filed with the U.S. Patent and
20 Trademark Office ("USPTO") fraudulent assignment documents allegedly assigning all four of
21 the Patents to Optima Technology Corporation ("OTC"), a company apparently owned by
22 Defendant Zandian. *Id.*, ¶ 15; see also the fraudulent assignment documents attached hereto as
23 **Exhibit 1.**¹ Upon discovery of the fraudulent filings, Mr. Margolin: (a) filed a report with the
24 Storey County Sheriff's Department; (b) took action to regain record title to the '488 and '436
25 Patents that he legally owned; and (c) assisted OTG in regaining record title of the '073 and
26

27
28 ¹ The signature on the attached Recordation Form Cover Sheet is that of Reza Zandian; also, the internal address for Optima Technology Corporation, which is apparently another name for Zandian, lists John Peter Lee Limited, 830 Las Vegas Boulevard South, Las Vegas, Nevada 89101, 702-382-4044, info@johnpeterlee.com.

1 against Zandian. Plaintiff then filed and served a Notice of Entry of Default on Zandian on
2 December 7, 2010 and on his last known attorney on December 16, 2010.

3 On February 25, 2011, Plaintiff filed in this Court and served a certificate of service
4 indicating that the application for entry of default against Zandian was sent to attorney John
5 Peter Lee. On February 28, 2011, Plaintiff filed an application for default judgment against
6 Defendants Zandian, Optima Technology Corporation, a California Corporation, and Optima
7 Technology Corporation, a Nevada Corporation.

8 On March 1, 2011, a default judgment was entered against Zandian and the other
9 defendants for \$121,594.46. On March 7, 2011, notice of entry of that default was filed and
10 served by mail on Zandian and his counsel.

11 On June 9, 2011, Zandian filed the motion to dismiss.

12 III. ARGUMENT

13 **A. SERVICE OF THE SUMMONS AND COMPLAINT WAS** 14 **EFFECTUATED UPON ZANDIAN**

15 NRCP 4 states that service of the summons and complaint shall be made upon the
16 "defendant personally, or by leaving copies thereof at the defendant's dwelling house or usual
17 place of abode with some person of suitable age and discretion then residing therein, or by
18 delivering a copy of the summons and complaint to an agent authorized by appointment or by
19 law to receive service of process." NRCP 4(d)(6).

20 In this case, the complaint was filed on December 11, 2009. As Plaintiff was having
21 difficulty serving Zandian, the summons and complaint were mailed to Zandian's attorney,
22 John Peter Lee, on January 8, 2010, and a request for assistance in serving Zandian was made.
23 See Letter, dated 1/8/10, from Cassandra Joseph to John Peter Lee, attached hereto as **Exhibit**
24 **3.**³ Moreover, Zandian was personally served with the summons and complaint on February 2,
25 2010. See Affidavit of Service, dated 2/18/10, attached hereto as **Exhibit 2.**

26
27
28 ³ John Peter Lee never responded to Cassandra Joseph's request for assistance in serving Zandian and the
Defendant entities. At least, Mr. Lee never responded until well after the default was entered by filing the
instant motion, even though he represented Zandian prior to this action.

1 Therefore, Zandian was served with the summons and complaint and was given proper
2 notice of this lawsuit. In fact, Plaintiff took the additional step of mailing the summons and
3 complaint to Zandian and his lawyer. Unfortunately, for reasons known only to Zandian and
4 his lawyer, Zandian decided not to answer the complaint or otherwise respond to the complaint
5 in a timely manner.

6 **B. THIS COURT HAS JURISDICTION OVER ZANDIAN IN THIS ACTION**

7 Nevada's long arm statute states as follows: "A court of this state may exercise
8 jurisdiction over a party to a civil action on any basis not inconsistent with the Constitution of
9 this state or the Constitution of the United States." NRS 14.065(1). In addition, "[p]ersonal
10 service of summons upon a party outside this state is sufficient to confer upon a court of this
11 state jurisdiction over the party so served if the service is made by delivering a copy of the
12 summons, together with a copy of the complaint, to the party served in the manner provided by
13 statute or rule of court for service upon a person of like kind within this state." NRS
14 14.065(2).

15 In addition, in Nevada, "[t]here are two types of personal jurisdiction: general and
16 specific." *Baker v. Eighth Judicial Dist. Court ex rel. County of Clark*, 116 Nev. 527, 532,
17 999 P.2d 1020, 1023 (2000). "General jurisdiction is required in matters where a defendant is
18 held to answer in a forum for causes of action unrelated to his forum activities." *Baker v.*
19 *Eighth Judicial Dist. Court ex rel. County of Clark*, 116 Nev. 527, 532, 999 P.2d 1020, 1023
20 (2000). "General jurisdiction over a nonresident will lie where the nonresident's activities in
21 the forum are 'substantial' or 'continuous and systematic.'" *Id.* Said another way, "General
22 jurisdiction over the defendant 'is appropriate where the defendant's forum activities are so
23 "substantial" or "continuous and systematic" that [he] may be deemed present in the forum.'" *Freeman v. Second Judicial Dist. Court ex rel. County of Washoe*, 116 Nev. 550, 553, 1 P.3d
24 963, 965 (2000).

25
26 In addition, the following citation acknowledges that there must be minimum contacts
27 for the Court to exercise jurisdiction over a nonresident and states that owning property or
28 doing business within the state is enough to confer jurisdiction:

1 We acknowledged in *Metal-Matic, Inc. v. 8th Judicial District Court*, 82 Nev.
2 263, 415 P.2d 617 (1966), citing therein *International Shoe Co. v. State of*
3 *Washington*, 326 U.S. 310, 66 S.Ct. 154, 90 L.Ed. 95 (1945); *McGee v.*
4 *International Life*, 355 U.S. 220, 78 S.Ct. 199, 2 L.Ed.2d 223 (1957); and
5 *Hanson v. Denckla*, 357 U.S. 235, 78 S.Ct. 1228, 2 L.Ed.2d 1283 (1958), that
6 since *Pennoyer v. Neff*, 5 Otto 714, 95 U.S. 714, 24 L.Ed. 565 (1877), a
7 jurisdictional evolution has been taking place to such extent that the old
8 jurisdictional landmarks have been left far behind so that in many instances
9 states may now properly exercise jurisdiction over nonresidents not amenable
10 to service within their borders. The point has not been reached, however, where
11 state boundaries are not without significance. There must still be some
12 'affiliating' circumstances without which the courts of the state may not
13 entertain jurisdiction. *Hanson v. Denckla*, supra. Each case depends upon its
14 own circumstances, but while we adhere to the generalities of 'minimal
15 contact,' that contact must be of significance. **In this case it must amount to**
16 **owning property or doing business within this state.**

17 *McCulloch Corp. v. O'Donnell*, 83 Nev. 396, 398, 433 P.2d 839, 840 (1967).

18 In this case, Zandian owns property and does business within the forum state. As a
19 result, Zandian's forum activities are so "substantial" or "continuous and systematic" that he
20 may be deemed present in the forum and therefore general jurisdiction is appropriate.

21 In fact, Zandian currently owns real property throughout Nevada. He owns two
22 properties in Clark County.⁴ He owns 10 properties in Washoe County.⁵ He owns and/or is
23 partial owner of 6 properties in Lyon County.⁶ He is part owner of two properties in Churchill
24 County.⁷ He is part owner of one property in Elko County.⁸

25 With regards to doing business within Nevada, Zandian is a manager of 11000 Reno
26 Highway, Fallon, LLC, a Nevada LLC that is in active status.⁹ Currently, 11000 Reno
27 Highway, Fallon, LLC is listed as the owner of 640 acres of real property in Churchill
28 County.¹⁰

29 ⁴ See Zandian's Clark County property information, attached hereto as Exhibit 4.

30 ⁵ See Zandian's Washoe County property information, attached hereto as Exhibit 5.

31 ⁶ See Zandian's Lyon County property information, attached hereto as Exhibit 6.

32 ⁷ See Zandian's Churchill County property information, attached hereto as Exhibit 7.

33 ⁸ See Zandian's Elko County property information, attached hereto as Exhibit 8.

34 ⁹ See Zandian's manager information for 11000 Reno Highway, Fallon, L.L.C., attached hereto as Exhibit 9.

35 ¹⁰ See 11000 Reno Highway, Fallon, LLC's Churchill County property information, attached hereto as Exhibit
36 10.

1 Zandian is a managing member and registered agent of Misfits Development LLC, a
2 Nevada LLC in active status.¹¹ Zandian is a managing member and registered agent of Elko
3 North 5th Avenue, LLC, a Nevada LLC in active status.¹² Zandian is a managing member and
4 registered agent for Stagecoach Valley LLC, an active Nevada LLC.¹³

5 Zandian acted as the resident agent for a revoked Nevada limited liability company
6 named Rock and Royalty LLC where Zandian's resident agent address was 1401 S. Las Vegas
7 Boulevard, Las Vegas, Nevada 89104.¹⁴ Zandian was a managing member of Gold Canyon
8 Development LLC, a Nevada LLC that is now in default status.¹⁵ Zandian was a managing
9 member of High Tech Development LLC, a Nevada LLC that has been dissolved.¹⁶ Zandian
10 was a managing member of Lyon Park Development LLC, a Nevada LLC that has been
11 dissolved.¹⁷ Zandian was a managing member of Churchill Park Development LLC, a Nevada
12 LLC that has been dissolved.¹⁸ Zandian was a manager of Sparks Village LLC, a Nevada LLC
13 that is in default status.¹⁹ Zandian was president, secretary, treasurer, director and resident
14 agent of Optima Technology Corporation, a now revoked Nevada close corporation.²⁰
15 Zandian was a managing member of I-50 Plaza LLC, a Nevada LLC in default status.²¹
16 Zandian was a manager of Dayton Plaza, LLC, a Nevada LLC in default status.²² Finally,
17 Zandian was a manager of Reno Highway Plaza, LLC, a Nevada LLC in revoked status.²³

18
19 ¹¹ See Zandian's managing member and resident agent information for Misfits Development LLC, attached hereto
as Exhibit 11.

20 ¹² See Zandian's managing member and resident agent information for Elko North 5th Avenue, LLC, attached
hereto as Exhibit 12.

21 ¹³ See Zandian's managing member and resident agent information for Stagecoach Valley LLC, attached hereto as
Exhibit 13.

22 ¹⁴ See Zandian's resident agent information for Rock and Royalty LLC, attached hereto as Exhibit 14.

23 ¹⁵ See Zandian's managing member information for Gold Canyon Development LLC, attached hereto as Exhibit
15.

24 ¹⁶ See Zandian's managing member information for High Tech Development LLC, attached hereto as Exhibit 16.

25 ¹⁷ See Zandian's managing member information for Lyon Park Development LLC, attached hereto as Exhibit 17.

26 ¹⁸ See Zandian's managing member information for Churchill Park Development LLC, attached hereto as Exhibit
18.

27 ¹⁹ See Zandian's manager information for Sparks Village LLC, attached hereto as Exhibit 19.

28 ²⁰ See Zandian's information for Optima Technology Corporation, attached hereto as Exhibit 20.

²¹ See Zandian's information for I-50 Plaza LLC, attached hereto as Exhibit 21.

²² See Zandian's information for Dayton Plaza, LLC, attached hereto as Exhibit 22.

²³ See Zandian's information for Reno Highway Plaza, LLC, attached hereto as Exhibit 23.

1 Also, Zandian listed Carson City and Las Vegas addresses for his registered agent and
2 officer information for Rock and Royalty LLC, Optima Technology Corporation, High Tech
3 Development LLC, Lyon Park Development LLC, Churchill Park Development LLC, Sparks
4 Village, LLC, I-50 Plaza LLC, Dayton Plaza, LLC, 11000 Reno Highway Fallon LLC, Misfits
5 Development LLC, Elko North 5th Ave, LLC, and Stagecoach Valley LLC.²⁴

6 As demonstrated above, Zandian clearly owns or partially owns 21 properties within
7 and throughout the state of Nevada and Zandian clearly does a significant amount of business
8 within the state. His property ownership holdings and his business dealings, alone, show that
9 Zandian's forum activities are so "substantial" or "continuous and systematic" that he may be
10 deemed present in the forum and therefore general jurisdiction is appropriate.

11 **C. NEVADA HAS ABROGATED THE DOCTRINE OF SPECIAL/GENERAL**
12 **APPEARANCES**

13 Zandian argues that he is making a special appearance "for the purpose of testing both
14 the sufficiency of service and the jurisdiction of the court; thus, Zandian has not consented to
15 personal jurisdiction of any Nevada court by bringing the instant motion." *See Motion to*
16 *Dismiss on a Special Appearance, dated 6/8/11, 2:12-15, on file herein.*

17 However, the Nevada Supreme Court has abrogated the doctrine of special/general
18 appearances. *Hansen v. Eighth Judicial Dist. Court ex rel. County of Clark*, 116 Nev. 650,
19 656, 6 P.3d 982, 985 (2000). "Now, before a defendant files a responsive pleading such as an
20 answer, that defendant may move to dismiss for lack of personal jurisdiction, insufficiency of
21 process, and/or insufficiency of service of process, and such a defense is not 'waived by being
22 joined with one or more other defenses.' Alternatively, a defendant may raise its defenses,
23 including those relating to jurisdiction and service, in a responsive pleading." *Hansen*, 116
24 Nev. at 656, 6 P.3d at 986.

25 Zandian could have raised his alleged defenses of insufficiency of service of process
26 and lack of jurisdiction in a motion to dismiss without waiving such defenses and his "special"
27 appearance is a nullity. Therefore, Zandian's motion is merely a motion to dismiss. However,

28 ²⁴ See Exhibits 10, 11, 12, 13, 14, 16, 17, 18, 19, 20, 21, and 22, attached hereto.

1 as will be shown above and below, the motion to dismiss is procedurally and factually fatally
2 flawed.

3 **D. ZANDIAN CANNOT MEET THE STANDARD FOR A MOTION TO DISMISS**

4 "In considering 'a motion to dismiss, all well-pleaded allegations of material fact are
5 taken as true and construed in a light most favorable to the non-moving party.'" *Germaine*
6 *Music v. Universal Songs of Polygram*, 275 F. Supp. 2d 1288, 1294 (D. Nev. 2003) *aff'd in*
7 *part*, 130 F. App'x. 153 (9th Cir. 2005).

8 In his first paper filed with this Court, Zandian moves this Court to set aside the
9 judgment and dismiss the case. Zandian casually makes a short reference to NRCP 55(c) and
10 NRCP 60(b) in a request to set aside the default judgment and then in the same sentence
11 requests that the Court dismiss this case "on the grounds that the court does not enjoy personal
12 jurisdiction over Zandian." *See* Motion to Dismiss on a Special Appearance, dated 6/8/11,
13 6:9-11, on file herein.

14 However, as shown above, Zandian was properly served and his forum contacts are so
15 substantial as to create general jurisdiction over him in the State of Nevada. Therefore,
16 construing the complaint in the light most favorable to the Plaintiff, Zandian's motion to
17 dismiss cannot meet the standard for a motion to dismiss.

18 **E. ZANDIAN HAS NOT AND CANNOT MEET THE STANDARD FOR A**
19 **MOTION TO SET ASIDE**

20 If a defaulting party is dissatisfied with a default judgment, then the only procedural
21 remedy is to set aside the default. NRCP 60(b) states the standard for setting aside a default
22 judgment as follows:

23 On motion and upon such terms as are just, the court may relieve a party or a
24 party's legal representative from a final judgment, order, or proceeding for the
25 following reasons: (1) mistake, inadvertence, surprise, or excusable neglect; (2)
26 newly discovered evidence which by due diligence could not have been
27 discovered in time to move for a new trial under Rule 59(b); (3) fraud (whether
28 heretofore denominated intrinsic or extrinsic), misrepresentation or other
misconduct of an adverse party; (4) the judgment is void; or, (5) the judgment
has been satisfied, released, or discharged, or a prior judgment upon which it is
based has been reversed or otherwise vacated, or it is no longer equitable that
an injunction should have prospective application.

1 NRCP 60(b).

2 A district court's exercise of discretion in setting aside a default judgment, or in
3 refusing to do so, will not be disturbed in the absence of an abuse of discretion. *Hotel Last*
4 *Frontier Corp. v. Frontier Properties, Inc.*, 79 Nev. 150, 154, 380 P.2d 293, 294 (1963). The
5 district court must consider the following factors before granting a motion to set aside:

6 **First**, there must have been "*a prompt application to remove the judgment.*"
7 *Yochum*, 98 Nev. at 486, 653 P.2d at 1216 (citing *Hotel Last Frontier v.*
8 *Frontier Prop.*, 79 Nev. 150, 380 P.2d 293 (1963)) (citations omitted)
(emphasis added). **Second**, there must be an "*absence of an intent to delay the*
9 *proceedings.*" *Id.* (Emphasis added.) **Third**, there must be evidence of "*a lack*
10 *of knowledge of procedural requirements*" on the part of the moving party. *Id.*
11 (Emphasis added.) **Fourth**, the motion must be made in "*good faith.*" *Id.*
12 (Emphasis added.) **Fifth**, "*the moving party must promptly tender a*
13 *'meritorious defense'* to the claim for relief." *Yochum*, 98 Nev. at 487, 653 P.2d
at 1216-17 (citations omitted) (emphasis added). **Finally**, "*the court must give*
14 *due consideration to the state's underlying basic policy of resolving cases on*
15 *their merits whenever possible.*" *Yochum*, 98 Nev. at 487, 653 P.2d at 1217
16 (emphasis added).

17 *Kahn v. Orme*, 108 Nev. 510, 513, 835 P.2d 790, 792-93 (1992)(emphasis added).

18 The acceptable procedures to satisfy the requirement that a "meritorious defense" be
19 shown are as follows:

20 (1) the fact testimony or affidavit of one possessing testimonial qualifications,
21 which factual information, if true, would tend to establish a defense to all or
22 part of the claim for relief asserted; or (2) the opinion of counsel for a party,
23 based upon facts related to him (without setting forth such facts), that a
24 meritorious defense exists to all or part of the claim for relief asserted; or (3)
25 the tendering of a responsive pleading in good faith, with the moving papers,
26 which responsive pleading, if true, would tend to establish a meritorious
27 defense to all or part of the claim for relief asserted; or (4) any combination of
28 the above.

29 *Hotel Last Frontier Corp.*, 79 Nev. at 155, 380 P.2d at 295.

30 In this case, Zandian fails to show that there was prompt application to remove the
31 judgment or an absence of intent to delay the proceedings. There is nothing in Zandian's
32 motion to dismiss on either subject.

33 On the other hand, the facts demonstrate that Zandian and his counsel had notice of the
34 action and the default early on. In fact, on December 2, 2010, a default was entered against

1 Zandian. Plaintiff then filed and served a Notice of Entry of Default on Zandian on December
2 7, 2010 and on his last known attorney on December 16, 2010. On February 25, 2011,
3 Plaintiff filed in this Court and served a certificate of service indicating that the application for
4 entry of default against Zandian was sent to attorney John Peter Lee. On February 28, 2011,
5 Plaintiff filed an application for default judgment against Defendants Zandian, Optima
6 Technology Corporation, a California Corporation, and Optima Technology Corporation, a
7 Nevada Corporation. On March 1, 2011, a default judgment was entered against Zandian and
8 the other defendants for \$121,594.46. On March 7, 2011, notice of entry of that default was
9 filed and served by mail on Zandian and his counsel.

10 Notwithstanding the many notices provided to Zandian and his counsel, Zandian only
11 now seeks to cursorily "set aside" the default judgment. However, Zandian **provides no**
12 **explanation for the delay in responding to the default judgment** and he does not provide
13 any basis upon which to demonstrate an absence of intent to delay the proceedings. Zandian
14 only improperly attacks the action itself on the basis of jurisdiction and insufficiency of
15 service of process.

16 Zandian does not show any evidence of "*a lack of knowledge of procedural*
17 *requirements*" regarding setting aside a default judgment. None. To the contrary, Zandian
18 only points to NRCP 60(b) in his request to set aside the default judgment, and he only
19 grounds his request on service of process and jurisdiction. *See* Motion to Dismiss, dated
20 6/8/11, 6:9-10, on file herein.

21 Zandian fails to even bring a true motion to set aside and therefore has failed to bring a
22 motion to set aside in good faith. Zandian's motion is merely a motion to dismiss with a minor
23 reference to the procedural rule for setting aside the default, which constitutes bad faith.

24 Zandian does not proffer any defense, nor does he even indicate that a meritorious
25 defense exists. Zandian fails to provide this Court with any fact testimony or affidavit, which,
26 if true, would tend to establish a defense to all or part of the claims asserted. Zandian fails to
27 provide any opinion of counsel that a meritorious defense exists to all or part of the claims.

28 Zandian did not tender a responsive pleading in good faith, with the moving papers, which

1 responsive pleading, if true, would tend to establish a meritorious defense to all or part of the
2 claims. In short, Zandian has completely failed to show that he has a meritorious defense to
3 any of the claims asserted in the Complaint.

4 As a result of the above facts, Zandian has not and cannot meet the burden necessary to
5 allow this Court to set aside the default judgment.

6 **F. COUNTERMOTION TO STRIKE MOTION TO DISMISS AS ZANDIAN**
7 **PREVIOUSLY WAIVED HIS OBJECTIONS TO PERSONAL JURISDICTION,**
8 **PROCESS, OR SERVICE OF PROCESS**

9 NRCP 12(f) allows motions to strike as follows:

10 Upon motion made by a party before responding to a pleading or, if no
11 responsive pleading is permitted by these rules, upon motion made by a party
12 within 20 days after the service of the pleading upon the party or upon the
13 court's own initiative at any time, the court may order stricken from any
14 pleading any insufficient defense or any redundant, immaterial, impertinent, or
15 scandalous matter.

16 NRCP 12(f)(emphasis added).

17 In this case, after a default judgment was entered and noticed, Zandian has now
18 improperly filed a motion to dismiss on the grounds that this Court lacks jurisdiction over
19 Zandian. The motion to dismiss is improper because Zandian waived such defenses by not
20 objecting to insufficiency of service of process or lack of jurisdiction in a timely motion to
21 dismiss or a timely answer: "Objections to personal jurisdiction, process, or service of process
22 are waived, however, if not made in a timely motion or not included in a responsive
23 pleading such as an answer. *Hansen v. Eighth Judicial Dist. Court ex rel. County of Clark*,
24 116 Nev. 650, 656, 6 P.3d 982, 986 (2000).²⁵

25 Zandian clearly did not file a timely motion to dismiss or any other timely responsive
26 pleading regarding his objections to personal jurisdiction, process, or service of process.

27 Therefore, Zandian has waived any such defenses. As a result, Plaintiff now respectfully

28 ²⁵ This is consistent with NRCP 12(h)(1), which states as follows: "A defense of lack of jurisdiction over the person, insufficiency of process, or insufficiency of service of process is waived (A) if omitted from a motion in the circumstances described in subdivision (g), or (B) if it is neither made by motion under this rule nor included in a responsive pleading or an amendment thereof permitted by Rule 15(a) to be made as a matter of course."

1 requests that this Court strike Zandian's motion to dismiss based upon the fact that such
2 waived defenses are now an "insufficient defense" to object to this Court's jurisdiction.

3 **G. COUNTERMOTION FOR LEAVE TO AMEND THE COMPLAINT**

4 This countermotion is made and based upon NRCP 15(a) which states that leave to
5 amend a party's pleading "shall be freely given when justice so requires."

6 If the Court is willing to either dismiss or set aside the default judgment, then, and only
7 then, Plaintiff respectfully requests leave to amend the Complaint to properly reference
8 Zandian's actions in the Arizona case and to re-serve Zandian in a manner that Zandian cannot
9 complain of any further.

10 For instance, Plaintiff states in the Complaint that in the Arizona action, "Mr. Margolin
11 and OTG filed a cross-claim for declaratory relief against Zandian in order to obtain legal title
12 to their respective patents." See Complaint, ¶ 17. While Zandian effectively represents to this
13 Court that he was not involved in the Arizona action, it is absolutely true that Zandian signed
14 the fraudulent patent assignments on behalf of Optima Technology Corporation, which
15 fraudulent assignments led to the instant action. It is by and through the fraudulent actions of
16 one individual, Zandian, which created the Arizona action and the instant action. However,
17 Plaintiff recognizes that Optima Technology Corporation was the entity behind
18 hid in the Arizona action. Plaintiff is willing to amend the Complaint to so alle

19 In addition, if the Court finds there is insufficiency of service of process
20 respectfully requests this Court's assistance in obtaining a current address from
21 counsel as to where Zandian can be "properly" served with a summons and con
22 Plaintiff would be more than willing to re-allege in an amended complaint the current
23 residence of Zandian, wherever that may be.

24 However, Plaintiff vehemently rejects any notion that Plaintiff fraudulently alleged the
25 residence of Zandian in the original Complaint or any other fact in the Complaint. The
26 attached property records and business records show that Zandian has represented to the
27 subject counties and state of Nevada that his addresses were in both Nevada and California.
28

1 Moreover, when asked for assistance in serving Zandian, his counsel refused to
2 respond or assist.²⁶ Instead, Zandian slurs Plaintiff with allegations of fraud regarding
3 Zandian's residence or whereabouts. Then Zandian states that his residency "was at all times
4 in California", without telling the Court where in California he resides. In fact, Zandian fails
5 to ever deny that he resided in Fair Oaks, California, where he was served with the summons
6 and complaint. See Affidavit of Service, dated 2/18/10, attached hereto as Exhibit 2.

7 **IV. CONCLUSION**

8 Based upon the foregoing, Plaintiff respectfully requests that this Court deny Zandian's
9 motion to dismiss and grant Plaintiff's countermotions. More specifically, Plaintiff has
10 demonstrated that Zandian was properly served and jurisdiction is proper. Moreover, Zandian
11 failed to bring a timely motion to dismiss and therefore Zandian waived any objections to
12 jurisdiction or insufficiency of process. Therefore, the motion to dismiss should be denied and
13 stricken accordingly.

14 Zandian also failed to bring a proper motion to set aside and therefore any such motion
15 should be denied.

16 Finally, if this Court decides to grant any of Zandian's requests, then Plaintiff
17 respectfully requests leave to amend the Complaint in order to remedy any defects therein.

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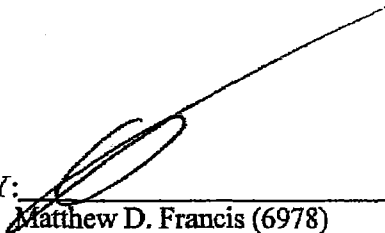
27 ²⁶ See Letter, dated 1/8/10, from Cassandra Joseph to John Peter Lee, attached hereto as Exhibit 3. John Peter
28 Lee never responded to Cassandra Joseph's request for assistance in serving Zandian and the Defendant entities.
At least, Mr. Lee never responded until well after the default was entered by filing the instant motion, even
though he represented Zandian prior to this action.

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AFFIRMATION PURSUANT TO PLS 239B.030

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

Dated this 22nd day of June, 2011.

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

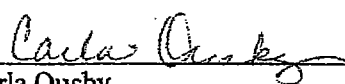
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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of Watson Rounds, and that on this date, I deposited for mailing, in a sealed envelope, with first-class postage prepaid, a true and correct copy of the foregoing document, **OPPOSITION TO MOTION TO DISMISS AND COUNTERMOTIONS TO STRIKE AND FOR LEAVE TO AMEND THE COMPLAINT**, addressed as follows:

John Peter Lee
John Peter Lee, Ltd.
830 Las Vegas Blvd. South
Las Vegas, NV 89101

Dated: June 22, 2011



Carla Ousby

INDEX OF EXHIBITS

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Exhibit No.	Title	Number of Pages
1	Fraudulent assignment documents	17
2	Affidavit of Service, dated 2/18/2010	4
3	Letter dated 1/8/2010	12
4	Zandian's Clark County property information	2
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9	Zandian's manager information for 11000 Reno Highway, Fallon, LLC	2
10	11000 Reno Highway, Fallon, LLC's Churchill County property information	1
11	Zandian's managing member and resident agent information for Misfits Development LLC	2
12	Zandian's managing member and resident agent information for Elko North 5 th Avenue, LLC	2
13	Zandian's managing member and resident agent information for Stagecoach Valley LLC	2
14	Zandian's resident agent information for Rock and Royalty LLC	2
15	Zandian's managing member information for Gold Canyon Development LLC	2
16	Zandian's managing member information for High Tech Development LLC	2
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20	Zandian's information for Optima Technology Corporation	2
21	Zandian's information for I-50 Plaza LLC	2
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23	Zandian's information for Reno Highway Plaza, LLC	2





UNITED STATES PATENT AND TRADEMARK OFFICE

UNDER SECRETARY OF COMMERCE FOR INTELLECTUAL PROPERTY AND
DIRECTOR OF THE UNITED STATES PATENT AND TRADEMARK OFFICE

700352576A

700352576A

DECEMBER 10, 2007

PTAS

OPTIMA TECHNOLOGY CORPORATION (NV)
C/O JOHN PETER LEE LIMITED
830 LAS VEGAS BOULEVARD SOUTH
LAS VEGAS, NEVADA 89101

UNITED STATES PATENT AND TRADEMARK OFFICE
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RECORDATION DATE: 12/05/2007

REEL/FRAME: 020218/0085

NUMBER OF PAGES: 4

BRIEF: ASSIGNMENT OF ASSIGNOR'S INTEREST (SEE DOCUMENT FOR DETAILS).

ASSIGNOR:

MARGOLIN, JED

DOC DATE: 12/05/2007

ASSIGNEE:

OPTIMA TECHNOLOGY CORPORATION (NV)
830 LAS VEGAS BOULEVARD SOUTH
C/O JOHN PETER LEE LIMITED
LAS VEGAS, NEVADA 89101

SERIAL NUMBER: 08513298

FILING DATE: 08/09/1995

PATENT NUMBER: 5566073

ISSUE DATE: 10/15/1996

TITLE: PILOT AID USING SYNTHETIC REALITY

SERIAL NUMBER: 08587731

FILING DATE: 01/19/1996

PATENT NUMBER: 5904724

ISSUE DATE: 05/18/1999

TITLE: METHOD AND APPARATUS FOR REMOTELY PILOTING AN AIRCRAFT

020218/0085 PAGE 2

SERIAL NUMBER: 09543252
PATENT NUMBER: 6377436

FILING DATE: 04/05/2000
ISSUE DATE: 04/23/2002

TITLE: MICROWAVE TRANSMISSION USING A LASER-GENERATED PLASMA BEAM WAVEGUIDE

SERIAL NUMBER: 09148045
PATENT NUMBER: 5978488
TITLE: SIMULATED AM RADIO

FILING DATE: 09/03/1998
ISSUE DATE: 11/02/1999

THERESA FREDERICK, EXAMINER
ASSIGNMENT SERVICES BRANCH
PUBLIC RECORDS DIVISION

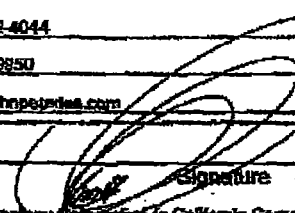
12/05/2007
700352576

Form PTO-1535 (Rev. 07/05)
OMB No. 0651-0027 (exp. 6/30/2008)

U.S. DEPARTMENT OF COMMERCE
United States Patent and Trademark Office

RECORDATION FORM COVER SHEET
PATENTS ONLY

To the Director of the U.S. Patent and Trademark Office: Please record the attached documents or the new address(es) below.

1. Name of conveying party(ies) Jed Margolin based on Power of Attorney dated July 20, 2004 to: Optima Technology Corporation (CA) Additional name(s) of conveying party(ies) attached? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	2. Name and address of receiving party(ies) Name: <u>Optima Technology Corporation (NV)</u> Internal Address: <u>c/o John Peter Lee Limited</u> Street Address: <u>830 Las Vegas Boulevard South</u> City: <u>Las Vegas</u> State: <u>Nevada</u> Country: <u>U.S.A.</u> Zip: <u>89101</u> Additional name(s) & address(es) attached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3. Nature of conveyance/Execution Date(s): Execution Date(s) <u>December 5, 2007</u> <input checked="" type="checkbox"/> Assignment <input type="checkbox"/> Merger <input type="checkbox"/> Security Agreement <input type="checkbox"/> Change of Name <input type="checkbox"/> Joint Research Agreement <input type="checkbox"/> Government Interest Assignment <input type="checkbox"/> Executive Order 9424, Confirmatory License <input type="checkbox"/> Other	Additional name(s) & address(es) attached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
4. Application or patent number(s): <input type="checkbox"/> This document is being filed together with a new application. A. Patent Application No.(s) B. Patent No.(s) <u>6,568,073</u> <u>6,904,724</u> <u>6,977,486</u> <u>6,978,488</u> Additional numbers attached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Name and address to whom correspondence concerning document should be mailed: Name: <u>Optima Technology Corporation (NV)</u> Internal Address: <u>c/o John Peter Lee Limited</u> Street Address: <u>830 Las Vegas Boulevard South</u> City: <u>Las Vegas</u> State: <u>Nevada</u> Zip: <u>89101</u> Phone Number: <u>702-382-4044</u> Fax Number: <u>702-382-8950</u> Email Address: <u>Info@johnpeterlee.com</u>	6. Total number of applications and patents involved: <u>4</u> 7. Total fee (37 CFR 1.21(f) & 3.41) \$ 150.00 <input checked="" type="checkbox"/> Authorized to be charged by credit card <input type="checkbox"/> Authorized to be charged to deposit account <input type="checkbox"/> Enclosed <input type="checkbox"/> None required (government interest not affecting title) 8. Payment Information a. Credit Card Last 4 Numbers <u>1004</u> Expiration Date <u>01/09</u> b. Deposit Account Number _____ Authorized User Name _____
9. Signature:  Signature Optima Technology Corporation (a California Corporation) Name of Person Signing	Date <u>12/05/2007</u> Total number of pages including cover sheet, attachments, and documents: <u>7</u>

Documents to be recorded (including cover sheet) should be filed to (SP1) 273-0140, or mailed to: Mail Stop Assignment Recordation Services, Director of the USPTO, P.O. Box 1450, Alexandria, VA 22312-1450

OP \$160.00 5586073



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UNDER SECRETARY OF COMMERCE FOR INTELLECTUAL PROPERTY AND
DIRECTOR OF THE UNITED STATES PATENT AND TRADEMARK OFFICE

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DECEMBER 10, 2007

PTAS

OPTIMA TECHNOLOGY COPORATION (NV)
C/O JOHN PETER LEE LIMITED
630 LAS VEGAS BPULEVARD SOUTH
LAS VEGAS, NEVADA 89101

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RECORDATION DATE: 12/05/2007

REEL/FRAME: 020218/0089
NUMBER OF PAGES: 5

BRIEF: ASSIGNMENT OF ASSIGNOR'S INTEREST (SEE DOCUMENT FOR DETAILS).

ASSIGNOR:

MARGOLIN, JED BASED ON POWER OF
ATTORNEY DATED JULY 20, 2004 TO:
OPTIMA TECHNOLOGY CORPORATION
(CA)

DOC DATE: 12/05/2007

ASSIGNEE:

OPTIMA TECHNOLOGY CORPORATION (NV)
830 LAS VEGAS BOULEVARD SOUTH
C/O JOHN PETER LEE LIMITED
LAS VEGAS, NEVADA 89101

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PATENT NUMBER: 6377436

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SERIAL NUMBER: 09148045

FILING DATE: 09/03/1998

PATENT NUMBER: 5978488

ISSUE DATE: 11/02/1999

TITLE: SIMULATED AM RADIO

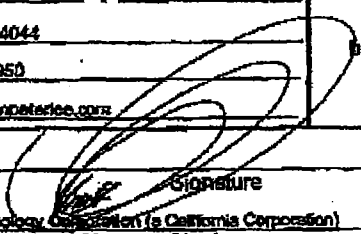
THERESA FREDERICK, EXAMINER
ASSIGNMENT SERVICES BRANCH
PUBLIC RECORDS DIVISION

Form PTO-1595 (Rev. 07/05)
OMB No. 0651-0027 (exp. 5/30/2008)

U.S. DEPARTMENT OF COMMERCE
United States Patent and Trademark Office

RECORDATION FORM COVER SHEET
PATENTS ONLY

To the Director of the U.S. Patent and Trademark Office: Please record the attached documents of the new address(es) below.

1. Name of conveying party(ies) Jed Margolin based on Power of Attorney dated July 20, 2004 to: Optima Technology Corporation (CA)		2. Name and address of receiving party(ies) Name: <u>Optima Technology Corporation (NV)</u> Internal Address: <u>c/o John Peter Lee Limited</u>	
Additional name(s) of conveying party(ies) attached? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Street Address: <u>890 Las Vegas Boulevard South</u>	
3. Nature of conveyance/Execution Date(s): Execution Date(s) <u>December 5, 2007</u> <input checked="" type="checkbox"/> Assignment <input type="checkbox"/> Merger <input type="checkbox"/> Security Agreement <input type="checkbox"/> Change of Name <input type="checkbox"/> Joint Research Agreement <input type="checkbox"/> Government Interest Assignment <input type="checkbox"/> Executive Order 9424, Confirmatory License <input type="checkbox"/> Other		City: <u>Las Vegas</u> State: <u>Nevada</u> Country: <u>U.S.A.</u> Zip: <u>89101</u>	
4. Application or patent number(s): A. Patent Application No.(s)		<input type="checkbox"/> This document is being filed together with a new application. B. Patent No.(s) <u>6,666,073</u> <u>5,904,724</u> <u>6,377,436</u> <u>5,978,488</u>	
Additional numbers attached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		5. Name and address to whom correspondence concerning document should be mailed: Name: <u>Optima Technology Corporation (NV)</u> Internal Address: <u>c/o John Peter Lee Limited</u> Street Address: <u>890 Las Vegas Boulevard South</u> City: <u>Las Vegas</u> State: <u>Nevada</u> Zip: <u>89101</u> Phone Number: <u>702-382-4044</u> Fax Number: <u>702-382-9950</u> Email Address: <u>info@johnpeterlee.com</u>	
6. Total number of applications and patents involved: <u>4</u>		7. Total fee (37 CFR 1.21(h) & 3.41) \$ <u>160.00</u> <input checked="" type="checkbox"/> Authorized to be charged by credit card <input type="checkbox"/> Authorized to be charged to deposit account <input type="checkbox"/> Enclosed <input type="checkbox"/> None required (government interest not affecting title)	
8. Payment Information a. Credit Card Last 4 Numbers <u>1004</u> Expiration Date <u>01/09</u> b. Deposit Account Number _____ Authorized User Name _____		9. Signature:  Signature _____ Date <u>12/5/2007</u> Optima Technology Corporation (a California Corporation) Name of Person Signing _____	
Total number of pages including cover sheet, attachments, and documents: <u>7</u>			

CP \$160.00 5569073

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Mail Stop Assignment Recordation Services, Director of the USPTO, P.O. Box 1450, Alexandria, VA, 22313-1450

020227/0287 PAGE 2

SERIAL NUMBER: 09543252

PATENT NUMBER: 6377436

TITLE: MICROWAVE TRANSMISSION USING A LASER-GENERATED PLASMA BEAM WAVEGUIDE

FILING DATE: 04/05/2000

ISSUE DATE: 04/23/2002

SERIAL NUMBER: 09148045

PATENT NUMBER: 5978488

TITLE: SIMULATED AM RADIO

FILING DATE: 09/03/1998

ISSUE DATE: 11/02/1999

MARCUS KIRK, EXAMINER
ASSIGNMENT SERVICES BRANCH
PUBLIC RECORDS DIVISION

020227/0287 PAGE 2

SERIAL NUMBER: 09543252

FILING DATE: 04/05/2000

PATENT NUMBER: 6377436

ISSUE DATE: 04/23/2002

TITLE: MICROWAVE TRANSMISSION USING A LASER-GENERATED PLASMA BEAM WAVEGUIDE

SERIAL NUMBER: 09148045

FILING DATE: 09/03/1998

PATENT NUMBER: 5978488

ISSUE DATE: 11/02/1999

TITLE: SIMULATED AM RADIO

MARCUS KIRK, EXAMINER
ASSIGNMENT SERVICES BRANCH
PUBLIC RECORDS DIVISION

12/07/2007
700352860

Form PTO-1535 (Rev. 07/05)
OMB No. 0651-0027 (exp. 6/30/2006)

U.S. DEPARTMENT OF COMMERCE
United States Patent and Trademark Office

RECORDATION FORM COVER SHEET
PATENTS ONLY

To the Director of the U.S. Patent and Trademark Office: Please record the attached documents or the new address(es) below.

1. Name of conveying party(ies) Jed Margolin based on Power of Attorney dated July 20, 2004 for Optima Technology Corporation (CA)		2. Name and address of receiving party(ies) Name: <u>Optima Technology Corporation (NV)</u> Internal Address: <u>c/o John Peter Lee Limited</u> Street Address: <u>830 Las Vegas Boulevard South</u> City: <u>Las Vegas</u> State: <u>Nevada</u> Country: <u>U.S.A.</u> Zip: <u>89101</u> Additional name(s) & address(es) attached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Additional name(s) of conveying party(ies) attached? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		3. Nature of conveyance/Execution Date(s): Execution Date(s) <u>December 5, 2007</u> <input checked="" type="checkbox"/> Assignment <input type="checkbox"/> Merger <input type="checkbox"/> Security Agreement <input type="checkbox"/> Change of Name <input type="checkbox"/> Joint Research Agreement <input type="checkbox"/> Government Interest Assignment <input type="checkbox"/> Executive Order 9424, Confirmatory License <input type="checkbox"/> Other	
4. Application or patent number(s): <input type="checkbox"/> This document is being filed together with a new application. A. Patent Application No.(s) B. Patent No.(s) <u>5,568,073</u> <u>5,904,724</u> <u>6,377,436</u> <u>5,978,488</u> Additional numbers attached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
5. Name and address to whom correspondence concerning document should be mailed: Name: <u>Optima Technology Corporation (NV)</u> Internal Address: <u>c/o John Peter Lee Limited</u> Street Address: <u>830 Las Vegas Boulevard South</u> City: <u>Las Vegas</u> State: <u>Nevada</u> Zip: <u>89101</u> Phone Number: <u>702-382-4044</u> Fax Number: <u>702-383-8850</u> Email Address: <u>info@johnpeterlee.com</u>		6. Total number of applications and patents involved: <u>4</u> 7. Total fee (37 CFR 1.21(h) & 3.41) \$160.00 <input checked="" type="checkbox"/> Authorized to be charged by credit card <input type="checkbox"/> Authorized to be charged to deposit account <input type="checkbox"/> Enclosed <input type="checkbox"/> None required (government interest not affecting title)	
8. Signature: <u>Jed Margolin by [Signature]</u> <u>his Attorney in fact</u> Optima Technology Corporation (a California Corporation) Name of Person Signing		a. Credit Card Last 4 Numbers <u>1004</u> Expiration Date <u>01/09</u> b. Deposit Account Number _____ Authorized User Name _____ Date <u>12/5/2007</u> Total number of pages including cover sheet, attachments, and documents: <u>7</u>	

OP \$160.00 5566073

Documents to be recorded (including cover sheet) should be filed to (571) 273-0140, or mailed to:
Mail Stop Assignment Recordation Services, Director of the USPTO, P.O. Box 1450, Alexandria, VA 22312-4450

Optima Technology Corporation

8775 Costa Verde Blvd.
Suite 501, San Diego CA 92122
Phone: 775-450-6833
Fax: 858-625-2460

December 5, 2007

United States Patent Office
Patent Assignment Department

Fax: 571-273-0140

Subject: Assignment of Patents

Dear Sir,

Reference to our telephone conversation of today with Mr. Maurice please find herewith the information cover sheet and credit card payment form and the power of attorney from Mr. Jed Margolin to Optima Technology Corporation for four patents Numbers:

5,566,073
5,904,724
6,377,436
5,978,488

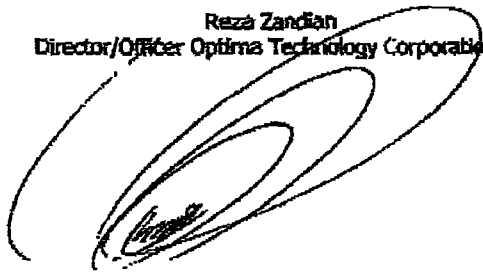
to be assigned to Optima Technology Corporation a Nevada Corporation with the Address:

Mr. John Peter Lee Esq.
830 Las Vegas Boulevard South,
Las Vegas NV 89101

Thank you in advance for your co-operation, please call 775-450-6833 if you have any question.

Truly Yours

Reza Zandian
Director/Officer Optima Technology Corporation







COPY

No. 090C00579 1B

Dept. I

REC'D & FILED
2010 MAR -9 PM 2:15
ALAN GLOVER
BY J. HARRIS
DEPUTY

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

SUMMONS

JED MARGOLIN, an individual
Plaintiff,

^{VS}
Optima Technology Corporation, a California corporation,
Optima Technology Corporation, a Nevada corporation, Reza
Zandian aka Golanreza Zandianjazi aka Gholam Reza Zandian
aka Reza Jazi aka J. Reza Defendant, Jazi aka G. Reza Jazi
aka Chononreza Zandian Jazi, an individual, DOE Companies
1-10, DOE Corporations 11-20, and DOE Individuals 21-30
DEFENDANTS

THE STATE OF NEVADA SENDS GREETINGS TO THE ABOVE-NAMED DEFENDANT:

NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS. READ THE INFORMATION BELOW.

TO THE DEFENDANT: A civil Complaint has been filed by the plaintiff against you.

1. If you wish to defend this lawsuit, you must, within 20 days after this Summons is served on you, exclusive of the day of service, file with this Court a written pleading in response to this Complaint.
2. Unless you respond, your default will be entered upon application of the plaintiff, and this Court may enter a judgment against you for the relief demanded in the Complaint*, which could result in the taking of money or property or the relief requested in the Complaint.
3. If you wish to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.
4. You are required to serve your response upon plaintiff's attorney, whose address is

ALAN GLOVER
Clerk of Court
By [Signature]
Deputy Clerk

Date 15 December 14, 2009, 20

*Note - When service by publication, insert a brief statement of the object of the action. See Rule 4.

RETURN OF SERVICE ON REVERSE SIDE

FIDAVIT OF SERVICE
(For General Use)

STATE OF CALIFORNIA }
COUNTY OF SACRAMENTO } SS.

ROBERT TOTH, declares under penalty of perjury:
That affiant is, and was on the day when he served the within Summons, over 18 years of age, and not a party to, nor interested in, the within action; that the affiant received the Summons on the 22ND day of JANUARY, 20 10, and personally served the same upon REZA ZANDIAN the within named defendant, on the 2ND day of FEBRUARY, 20 10, by delivering to the said defendant, personally, in FAIR OAKS, County of SACRAMENTO, State of CALIFORNIA, a copy of the Summons attached to a copy of the Complaint.

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

Executed this 12TH day of FEBRUARY, 20 10. Robt Toth
Signature of person making service

STATE OF NEVADA }
CARSON CITY } SS.

NEVADA SHERIFF'S RETURN
(For Use of Sheriff of Carson City)

I hereby certify and return that I received the within Summons on the _____ day of _____, 20 ____; and personally served the same upon _____, the within named defendant, on the _____ day of _____, 20 ____, by delivering to the said defendant, personally, in Carson City, State of Nevada, a copy of the Summons attached to a copy of the Complaint.

Sheriff of Carson City, Nevada

Date: _____, 20 ____ By _____ Deputy

STATE OF NEVADA }
COUNTY OF _____ } SS.

AFFIDAVIT OF MAILING
(For Use When Service is by Publication and Mailing)

_____, declares under penalty of perjury:
That affiant is, and was when the herein described mailing took place, over 18 years of age, and not a party to, nor interested in, the within action; that on the _____ day of _____, 20 ____, affiant deposited in the Post Office at _____, Nevada, a copy of the within Summons attached to a copy of the Complaint, enclosed in a sealed envelope upon which first class postage was fully prepaid, addressed to _____, the within named defendant, at _____; that there is a regular communication by mail between the place of mailing and the place so addressed.
I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

Executed this _____ day of _____, 20 ____.

NOTE - If service is made in any manner permitted by Rule 4 other than personally upon the defendant, or is made outside the United States, a special affidavit or return must be made

1 Jed Margolin v. Optima Technology Corp., et al.
2 Case No. 090C00579 1B
3 Declaration of Robert Toth

4 I, ROBERT TOTH, hereby declare:

5 I am a registered process server for the State of California. I have personal knowledge of
6 the facts contained in this Declaration, and if called as a witness, I could and would competently
7 testify thereto. As to those matters alleged on information and belief, I believe them to be true.

8 I served copies of the Summons and Complaint, on Reza Zandian aka Golanreza
9 Zandianjaza, aka Gholam Reza Zandian, aka Reza Jazi, aka J. Reza Jazi, aka G. Reza Jazi, aka
10 Ghononreza Zanian Jazi:

11 On January 26, 2010 at 8:43 a.m., I went to the residence address at 8401 Bonita Downs
12 Road, Fair Oaks, California 95628. There was no answer at the door.

13 On January 28, 2010 at 3:47 p.m., I returned to the residence again, and there was no
14 answer at the door.

15 On January 31, 2010 at 4:13 p.m., I went the residence address, and again there was no
16 answer at the door.

17 On February 2, 2010 at 5:37 p.m., when I returned to the residence address, I observed no
18 lights on, no cars parked, but that the trash was set out.

19 On February 2, 2010 at 7:21 p.m., I returned to the residence address. The door was
20 answered by an elderly man, described as mid to late-60's, middle eastern accent, 5'4" tall, grey
21 hair, long beard, thin, and wearing glasses. I told him I was looking for Reza. I showed him the
22 name on the documents with the various names, and made a motion that he knew one or more of
23 the names. I showed him the photograph that I had. I told him I had legal documents for Reza,
24 and that I would leave it with him. He took the envelope, opened it and saw the documents. He
25 told me that he did not want the papers and that he did not live there. I told him that we had
26 confirmed that was his address. He returned the envelope back. I told him that he needed to
27 make sure that Reza got the paperwork. I put the envelope by the doorway. He picked up the
28 envelope and threw it at me as I was leaving. I left the documents there and again told him that
he had been served for Reza.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration is executed this 18th day of February, at Citrus Heights, California.

Robert M Toth

ROBERT M. TOTH
Registered Process Server





WATSON
WR
ROUNDS

January 8, 2010

KELLY G. WATSON¹
MICHAEL D. ROUNDS¹
MATTHEW D. FRANCIS²

ARTHUR A. ZORIO¹
CASSANDRA P. JOSEPH¹
MELISSA P. BARNARD
RYAN E. JOHNSON
TARA A. SHIROFF
MATTHEW G. HOLLAND
ADAM P. McMILLEN²
ELIZA BECHTOLD¹
ADAM YOWELL

OF COUNSEL
MARC D. FOODMAN^{1,2}

¹ Also licensed in California
² Also licensed in Utah
³ Also licensed in Massachusetts
⁴ Licensed only in California

5371 Kietzke Lane
Reno, Nevada 89511
(775) 324-4100
Fax (775) 333-8171
e-mail: reno@watsonrounds.com

777 North Rainbow Boulevard
Suite 350
Las Vegas, Nevada 89107
(702) 636-4902
Fax (702) 636-4904

One Market-Stewart Tower
Suite 1600
San Francisco, CA 94105
(415) 243-4990
Fax (415) 243-0226

www.watsonrounds.com

Reply to: Reno

John Peter Lee, Esq.
John Peter Lee, Ltd.
830 Las Vegas Boulevard South
Las Vegas, NV 89101

Re: Optima Technology Corporation and Reza Zandian

Dear Mr. Lee:

We represent Mr. Jed Margolin in a case pending in the First Judicial District Court for the State of Nevada in and for Carson City, Case No. 09 0C 00579 1B captioned *Jed Margolin v. Optima Technology Corporation (CA), Optima Technology Corporation (NV), Reza Zandian aka Golamreza Zandianjazi aka aka Gholam Reza Zandian, aka Reza Jazi, aka J. Reza Jazi, aka G. Reza Jazi, aka Ghonoreza Zandian Jazi* (the Action). Copies of the summonses and complaint filed in the Action are enclosed.

We understand that at one time you represented one or more of the Defendants named in the Action. We are attempting to effectuate service of the enclosed summonses and complaint on Mr. Zandian and the Defendant entities and have been unsuccessful thus far. Please inform me whether you currently represent Mr. Zandian or the Defendant entities, and if so, whether you will accept service on behalf of any of the Defendants. If you refuse or cannot accept service on behalf of any of the Defendants, please provide any information possible regarding the whereabouts of any of the Defendants. Alternatively, please provide copies of the summonses and complaint to the Defendants.

Please inform me by January 29, 2010 whether or not you will accept service of the summonses and complaint on behalf of any of the Defendants, or whether you



John Peter Lee, Esq.
January 8, 2010
Page 2

will take any other action requested herein. I look forward to hearing from you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cassandra P. Joseph".

Cassandra P. Joseph
WATSON ROUNDS
A Professional Corporation

COPY

1 Case No.: 09 DC 00579 1B
2 Dept. No.: I

REC'D & FILED
2009 DEC 11 PM 4:07
BY ANGLOVER CLERK
LALE DEPUTY

6 IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
7 IN AND FOR CARSON CITY

8 JED MARGOLIN, an individual,
9
10 Plaintiff,

11 vs.

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

24 COMPLAINT
25 (Exemption From Arbitration Requested)

26 Plaintiff, JED MARGOLIN ("Mr. Margolin"), by and through his counsel of record,
27 WATSON ROUNDS, and for his Complaint against Defendants, hereby alleges and complains
28 as follows:

The Parties

1. Plaintiff Mr. Margolin is an individual residing in Storey County, Nevada.
2. On information and belief, Defendant Optima Technology Corporation is a

1 California corporation with its principal place of business in Irvine, California.

2 3. On information and belief, Defendant Optima Technology Corporation is a
3 Nevada corporation with its principal place of business in Las Vegas, Nevada.

4 4. On information and belief, Defendant Reza Zandian, aka Golamreza Zandianjazi,
5 aka Golamreza Zandianjazi, aka Gholam Reza Zandian, aka Reza Jazi, aka J. Reza Jazi, aka G.
6 Reza Jazi, aka Ghononreza Zandian Jazi (collectively "Zandian"), is an individual who at all
7 relevant times resided in San Diego, California or Las Vegas, Nevada.

8 5. On information and belief, Defendant Optima Technology Corporation, the
9 Nevada corporation ("OTC—Nevada") is a wholly owned subsidiary of Optima Technology
10 Corporation, the California corporation ("OTC—California"), and Defendant Zandian at all
11 relevant times served as officers of the OTC—California and OTC—Nevada.

12 6. Mr. Margolin believes, and therefore alleges, that at all times herein mentioned,
13 each of the Defendants was the agent, servant or employee of each of the other Defendant and at
14 all times was acting within the course and scope of said agency and/or employment and that each
15 Defendant is liable to Mr. Margolin for the reasons and the facts herein alleged. Relief is sought
16 herein against each and all of the Defendants jointly and severally, as well as its or their agents,
17 assistants, successors, employees and all persons acting in concert or cooperation with them or at
18 their direction. Mr. Margolin will amend his Complaint when such additional persons acting in
19 concert or cooperation are ascertained.
20
21

22 **Jurisdiction and Venue**

23
24 7. Pursuant to the Nevada Constitution, Article 6, Section 6, the district courts of the
25 State of Nevada have original jurisdiction in all cases excluded by law from the original
26 jurisdiction of the justice courts. This case involves tort claims in an amount in excess of the
27 jurisdictional limitation of the justice courts and, accordingly, jurisdiction is proper in the district
28 court.

1 8. Venue is based upon the provisions of N.R.S. § 13.010, et seq., inasmuch as the
2 Defendants at all times herein mentioned has been and/or is residing or currently doing business
3 in and/or are responsible for the actions complained of herein in Storey County.

4 Facts

5 9. Plaintiff Mr. Margolin is the named inventor on numerous patents and patent
6 applications, including United States Patent No. 5,566,073 ("the '073 Patent"), United States
7 Patent No. 5,904,724 ("the '724 Patent"), United States Patent No. 5,978,488 ("the '488 Patent")
8 and United States Patent No. 6,377,436 ("the '436 Patent") (collectively "the Patents").

9 10. Mr. Margolin is the legal owner and owner of record for the '488 and '436
10 Patents, and has never assigned those patents.

11 11. In July 2004, Mr. Margolin granted to Optima Technology Group ("OTG"), a
12 Cayman Islands Corporation specializing in aerospace technology, a Power of Attorney
13 regarding the '073 and '724 Patents. In exchange for the Power of Attorney, OTG agreed to pay
14 Mr. Margolin royalties based on OTG's licensing of the '073 and '724 Patents.

15 12. In May 2006, OTG and Mr. Margolin licensed the '073 and '724 Patents to
16 Geneva Aerospace, Inc., and Mr. Margolin received a royalty payment pursuant to the royalty
17 agreement between Mr. Margolin and OTG.

18 13. On about July 20, 2004, Mr. Margolin assigned the '073 and '724 Patents to
19 OTG.
20

21 14. In about November 2007, OTG licensed the '073 Patent to Honeywell
22 International, Inc., and Mr. Margolin received a royalty payment pursuant to the royalty
23 agreement between Mr. Margolin and OTG.
24

25 15. In December 2007, Defendant Zandian filed with the U.S. Patent and Trademark
26 Office ("USPTO") fraudulent assignment documents allegedly assigning all four of the Patents
27 to Optima Technology Corporation.
28

1 16. Upon discovery of the fraudulent filing, Mr. Margolin: (a) filed a report with the
2 Storey County Sheriff's Department; (b) took action to regain record title to the '488 and '436
3 Patents that he legally owned; and (c) assisted OTG in regaining record title of the '073 and '724
4 Patents that it legally owned and upon which it contracted with Mr. Margolin for royalties.

5 17. Soon thereafter, Mr. Margolin and OTG were named as defendants in an action
6 for declaratory relief regarding non-infringement of the '073 and '724 Patents in the United
7 States District Court for the District of Arizona, in a case titled: *Universal Avionics Systems*
8 *Corporation v. Optima Technology Group, Inc.*, No. CV 07-588-TUC-RCC (the "Arizona
9 Action"). In the Arizona Action, Mr. Margolin and OTG filed a cross-claim for declaratory
10 relief against Zandian in order to obtain legal title to their respective patents.
11

12 18. On August 18, 2008, the United States District Court for the District of Arizona
13 entered a final judgment in favor of Mr. Margolin and OTG on their declaratory relief action, and
14 ordered that OTC had no interest in the '073 or '724 Patents, and that the assignment documents
15 filed with the USPTO were "forged, invalid, void, of no force and effect." Attached as Exhibit A
16 is a copy of the Order from the United States District Court in the Arizona Action.
17

18 19. Due to Defendants' fraudulent acts, title to the Patents was clouded and interfered
19 with Plaintiff's and OTG's ability to license the Patents.

20 20. During the period of time Mr. Margolin worked to correct record title of the
21 Patents in the Arizona Action and with the USPTO, he incurred significant litigation and other
22 costs associated with those efforts.
23

24 **Claim 1--Conversion**
 (Against All Defendants)

25 21. Paragraphs 1-20 of the Complaint set forth above are incorporated herein by
26 reference.

27 22. Through the fraudulent acts described above, Defendants wrongfully exerted
28 dominion over the Patents, thereby depriving Mr. Margolin of the use of such property.

1 23. The Patents and the royalties due Mr. Margolin under the Patents were the
2 personal property of Mr. Margolin.

3 24. As a direct and proximate result of the Defendants' conversion, Mr. Margolin has
4 suffered damages in excess of ten thousand dollars (\$10,000), entitling him to the relief set forth
5 below.

6 **Claim 2—Tortious Interference With Contract**
7 **(Against All Defendants)**
8

9 25. Paragraphs 1-24 of the Complaint set forth above are incorporated herein by
10 reference.

11 26. Mr. Margolin was a party to a valid contract with OTG for the payment of
12 royalties based on the license of the '073 and '724 Patents.

13 27. Defendants were aware of Mr. Margolin's contract with OTG.

14 28. Defendants committed intentional acts intended and designed to disrupt and
15 interfere with the contractual relationship between Mr. Margolin and OTG.

16 29. As a result of the acts of Defendants, Mr. Margolin's contract with OTG was
17 actually interfered with and disrupted.

18 30. As a direct and proximate result of the Defendants' tortious interference with
19 contract, Mr. Margolin has suffered damages in excess of ten thousand dollars (\$10,000),
20 entitling him to the relief set forth below.

21 **Claim 3—Intentional Interference with Prospective Economic Advantage**
22 **(Against All Defendants)**
23

24 31. Paragraphs 1-30 of the Complaint set forth above are incorporated herein by
25 reference.

26 32. Defendants were aware of Mr. Margolin's prospective business relations with
27 licensees of the Patents.

28 33. Defendants purposely, willfully and improperly attempted to induce Mr.
Margolin's prospective licensees to refrain from engaging in business with Mr. Margolin.

1 34. The foregoing actions by Defendants interfered with the business relationships of
2 Mr. Margolin, and were done intentionally and occurred without consent or authority of Mr.
3 Margolin.

4 35. As a direct and proximate result of the Defendants' tortious interference, Mr.
5 Margolin has suffered damages in excess of ten thousand dollars (\$10,000), entitling him to the
6 relief set forth below.

7 **Claim 4—Unjust Enrichment**
8 **(Against All Defendants)**

9 36. Paragraphs 1-35 of the Complaint set forth above are incorporated herein by
10 reference.

11 37. Defendants wrongfully obtained record title to the Patents.

12 38. Defendants were aware that record title to the Patents was valuable, and were
13 aware of the benefit derived from having record title.

14 39. Defendants unjustly benefitted from the use of Mr. Margolin's property without
15 compensation to Mr. Margolin.

16 40. As a direct and proximate result of Defendants' aforementioned acts, Mr.
17 Margolin is entitled to equitable relief.

18 **Claim 5—Unfair and Deceptive Trade Practices**
19 **(Against All Defendants)**

20 41. Paragraphs 1-40 of the Complaint set forth above are incorporated herein by
21 reference.

22 42. The Defendants, engaging in the acts and conduct described above, have
23 knowingly and willfully committed unfair and deceptive trade practices under NRS 598.0915 by
24 making false representations.

25 43. As a direct and proximate result of the Defendants' unfair and deceptive trade
26 practices, Mr. Margolin has suffered damages in excess of ten thousand dollars (\$10,000),
27 entitling him to the relief set forth below.
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WHEREFORE, Plaintiff Jed Margolin, prays for judgment against the Defendants as

follows:

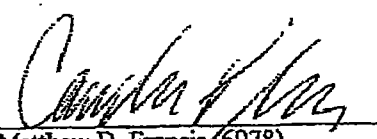
1. That Plaintiff be awarded damages for Defendants' tortious conduct;
2. That Plaintiff be awarded damages for Defendants' unjust enrichment;
3. That Plaintiff be awarded damages for Defendants' commission of unfair and deceptive trade practices, in an amount to be proven at trial, with said damages being trebled pursuant to NRS 598.0999;
4. That Plaintiff be awarded actual, consequential, future, and punitive damages of whatever type or nature;
5. That the Court award all such further relief that it deems just and proper.

AFFIRMATION

Pursuant to NRS 239B.030, the undersigned does hereby affirm that the preceding document, filed in District Court, does not contain the social security number of any person.

DATED: December 10, 2009

WATSON ROUNDS



Matthew D. Francis (6978)
Cassandra P. Joseph (9845)
WATSON ROUNDS
5371 Kietzke Lane
Reno, NV 89511
Telephone: 775-324-4100
Facsimile: 775-333-8171

Attorneys for Plaintiff Jed Margolin

Exhibit 1

Exhibit 1

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

UNIVERSAL AVIONICS SYSTEMS) CORPORATION,

Plaintiff,

vs.

OPTIMA TECHNOLOGY GROUP, INC.,
OPTIMA TECHNOLOGY CORPORATION, ROBERT ADAMS and JED MARGOLIN,

Defendants.

OPTIMA TECHNOLOGY INC. a/k/a
OPTIMA TECHNOLOGY GROUP, INC.,
a corporation,

Counterclaimant,

vs.

UNIVERSAL AVIONICS SYSTEMS CORPORATION, an Arizona corporation,

Counterdefendant,

OPTIMA TECHNOLOGY INC. a/k/a
OPTIMA TECHNOLOGY GROUP, INC.,

Cross-Claimant,

vs.

OPTIMA TECHNOLOGY CORPORATION,

Cross-Defendant.

No. CV 07-588-TUC-RCC

ORDER

1 This Court, having considered the Defendants' Application for Entry of Default
2 Judgment against Cross-Defendant Optima Technology Corporation, finds no just reason to
3 delay entry of final judgment.

4 Therefore, IT IS HEREBY ORDERED:

5 Final Judgment is entered against Cross-Defendants Optima Technology Corporation,
6 a California corporation, and Optima Technology Corporation, a Nevada corporation, as
7 follows:

8 1. Optima Technology Corporation has no interest in U.S. Patents Nos. 5,566,073 and
9 5,904,724 ("the Patents") or the Durable Power of Attorney from Jed Margolin dated July
10 20, 2004 ("the Power of Attorney");

11 2. The Assignment Optima Technology Corporation filed with the USPTO is forged,
12 invalid, void, of no force and effect, and is hereby struck from the records of the USPTO;

13 3. The USPTO is to correct its records with respect to any claim by Optima
14 Technology Corporation to the Patents and/or the Power of Attorney; and

15 4. OTC is hereby enjoined from asserting further rights or interests in the Patents
16 and/or Power of Attorney; and

17 5. There is no just reason to delay entry of final judgment as to Optima Technology
18 Corporation under Federal Rule of Civil Procedure 54(b).

19 DATED this 18th day of August, 2008.

20
21
22 

23 Raner C. Collins
24 United States District Judge



GENERAL INFORMATION	
PARCEL	071-02-000-005
OWNER AND MAILING ADDRESS	ZANDIAN REZA 8775 COSTA VERDE #501 SAN DIEGO CA 92122-5343
LOCATION ADDRESS CITY/UNINCORPORATED TOWN	MOAPA VALLEY
ASSESSOR DESCRIPTION	PT NE4 NE4 SEC 02 16 68 SEC 02 TWP 16 RNG 68
RECORDED DOCUMENT NO.	* 20050419:04639
RECORDED DATE	04/19/2005
VESTING	NO STATUS

*Note: Only documents from September 15, 1999 through present are available for viewing.

ASSESSMENT INFORMATION AND SUPPLEMENTAL VALUE	
TAX DISTRICT	826
APPRAISAL YEAR	2010
FISCAL YEAR	10-11
SUPPLEMENTAL IMPROVEMENT VALUE	0
SUPPLEMENTAL IMPROVEMENT ACCOUNT NUMBER	N/A

REAL PROPERTY ASSESSED VALUE		
FISCAL YEAR	2010-11	2011-12
LAND	7000	5250
IMPROVEMENTS	0	0
PERSONAL PROPERTY	0	0
EXEMPT	0	0
GROSS ASSESSED (SUBTOTAL)	7000	5250
TAXABLE LAND+IMP (SUBTOTAL)	20000	15000
COMMON ELEMENT ALLOCATION ASSD	0	0
TOTAL ASSESSED VALUE	7000	5250
TOTAL TAXABLE VALUE	20000	15000

ESTIMATED LOT SIZE AND APPRAISAL INFORMATION	
ESTIMATED SIZE	10.00 Acres
ORIGINAL CONST. YEAR	0
LAST SALE PRICE MONTH/YEAR	24000 04/05
LAND USE	0-00 VACANT
DWELLING UNITS	0

GENERAL INFORMATION	
PARC ID	071-02-000-013
OWNER AND MAILING ADDRESS	ZANDIAN REZA 8775 COSTA VERDE #501 SAN DIEGO CA 92122-5343
LOCATION ADDRESS CITY/UNINCORPORATED TOWN	MOAPA VALLEY
ASSESSOR DESCRIPTION	PT SE4 NE4 SEC 02 16 68 SEC 02 TWP 16 RNG 68
RECORDED DOCUMENT NO.	* 20050420:00563
RECORDED DATE	04/20/2005
VESTING	NO STATUS

*Note: Only documents from September 15, 1999 through present are available for viewing.

ASSESSMENT INFORMATION AND SUPPLEMENTAL VALUE	
TAX DISTRICT	826
APPRAISAL YEAR	2010
FISCAL YEAR	10-11
SUPPLEMENTAL IMPROVEMENT VALUE	0
SUPPLEMENTAL IMPROVEMENT ACCOUNT NUMBER	N/A

REAL PROPERTY ASSESSED VALUE		
FISCAL YEAR	2010-11	2011-12
LAND	14000	10500
IMPROVEMENTS	0	0
PERSONAL PROPERTY	0	0
EXEMPT	0	0
GROSS ASSESSED (SUBTOTAL)	14000	10500
TAXABLE LAND+IMP (SUBTOTAL)	40000	30000
COMMON ELEMENT ALLOCATION ASSD	0	0
TOTAL ASSESSED VALUE	14000	10500
TOTAL TAXABLE VALUE	40000	30000

ESTIMATED LOT SIZE AND APPRAISAL INFORMATION	
ESTIMATED SIZE	20.00 Acres
ORIGINAL CONST. YEAR	0
LAST SALE PRICE MONTH/YEAR	40000 04/05
LAND USE	0-00 VACANT
DWELLING UNITS	0

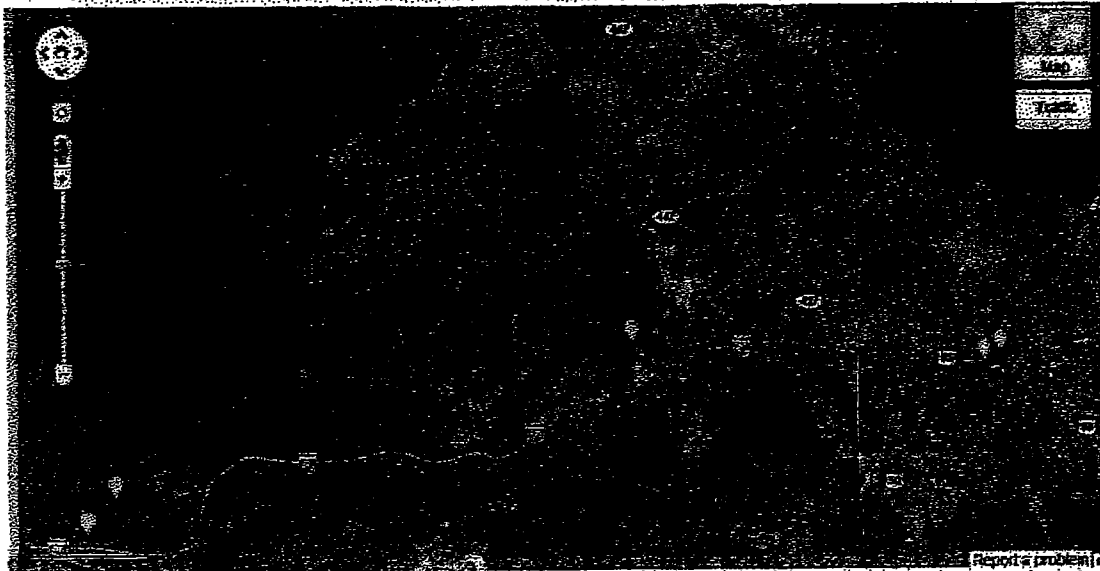


Zandian's Washoe County Properties - Jed Margolin 4/17/2011

From Washoe County Web site - Assessor's Database: <http://www.co.washoe.nv.us/assessor/cama/search.php>
 (from a search for "Zandian") April 14, 2011 by Jed Margolin

APN	Card	Situs			
Owner Name		Mailing Address			Last Transaction Date
079-150-12	1	STATE ROUTE 447			
REZA ZANDIAN		PO BOX 927674	SAN DIEGO CA 92192		06/27/2005
079-150-09	1	STATE ROUTE 447			
REZA ZANDIAN		PO BOX 81624	LAS VEGAS NV 89180		05/12/2009
079-150-10	1	STATE ROUTE 447			
REZA ZANDIAN		PO BOX 81624	LAS VEGAS NV 89180		05/12/2009
079-150-13	1	STATE ROUTE 447			
REZA ZANDIAN		PO BOX 81624	LAS VEGAS NV 89180		05/12/2009
084-040-02	1	PIERSON CANYON RD			
REZA ZANDIAN		PO BOX 81624	LAS VEGAS NV 89180		05/12/2009
084-040-04	1	E INTERSTATE 80			
REZA ZANDIAN		PO BOX 81624	LAS VEGAS NV 89180		05/12/2009
084-040-06	1	E INTERSTATE 80			
REZA ZANDIAN		PO BOX 81624	LAS VEGAS NV 89180		05/12/2009
084-040-10	1	E INTERSTATE 80			
REZA ZANDIAN		PO BOX 81624	LAS VEGAS NV 89180		05/12/2009
084-130-07	1	E INTERSTATE 80			
REZA ZANDIAN		PO BOX 81624	LAS VEGAS NV 89180		05/12/2009
084-140-17	1	E INTERSTATE 80			
REZA ZANDIAN		PO BOX 81624	LAS VEGAS NV 89180		05/12/2009

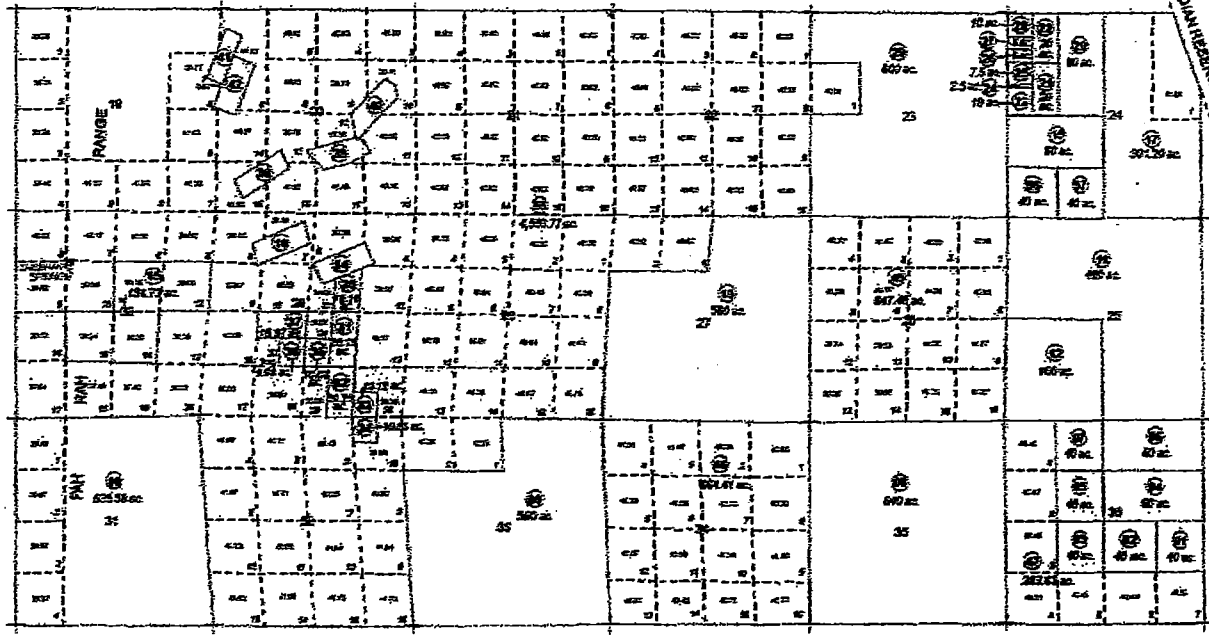
The properties are North of Interstate 80 and East of SR 447. From Google Maps via Zandian's Web site at www.goldennevada.com. The remaining information is from Washoe County Web site - Assessor's Database.



POTENTIAL MINING CLAIMS

- 02-100-01 Pkt. No. 100000, Lot 1
- 02-100-02 Pkt. No. 100000, Lot 2
- 02-100-03 Pkt. No. 100000, Lot 3
- 02-100-04 Pkt. No. 100000, Lot 4
- 02-100-05 Pkt. No. 100000, Lot 5
- 02-100-06 Pkt. No. 100000, Lot 6
- 02-100-07 Pkt. No. 100000, Lot 7
- 02-100-08 Pkt. No. 100000, Lot 8
- 02-100-09 Pkt. No. 100000, Lot 9
- 02-100-10 Pkt. No. 100000, Lot 10
- 02-100-11 Pkt. No. 100000, Lot 11
- 02-100-12 Pkt. No. 100000, Lot 12
- 02-100-13 Pkt. No. 100000, Lot 13
- 02-100-14 Pkt. No. 100000, Lot 14
- 02-100-15 Pkt. No. 100000, Lot 15
- 02-100-16 Pkt. No. 100000, Lot 16
- 02-100-17 Pkt. No. 100000, Lot 17
- 02-100-18 Pkt. No. 100000, Lot 18
- 02-100-19 Pkt. No. 100000, Lot 19
- 02-100-20 Pkt. No. 100000, Lot 20
- 02-100-21 Pkt. No. 100000, Lot 21
- 02-100-22 Pkt. No. 100000, Lot 22
- 02-100-23 Pkt. No. 100000, Lot 23
- 02-100-24 Pkt. No. 100000, Lot 24
- 02-100-25 Pkt. No. 100000, Lot 25
- 02-100-26 Pkt. No. 100000, Lot 26
- 02-100-27 Pkt. No. 100000, Lot 27
- 02-100-28 Pkt. No. 100000, Lot 28
- 02-100-29 Pkt. No. 100000, Lot 29
- 02-100-30 Pkt. No. 100000, Lot 30

SOUTH 1/2 OF TOWNSHIP 21 NORTH - RANGE 23 EAST



079-150-12 1 STATE ROUTE 447
RESA ZANDIAN PO BOX 927674 SAN DIEGO CA 92192 06/27/2005

160 acres

County Home => Assessor's Office => Property Assessment Data Search => Parcel Search => Ownership

APN 079-150-12	Owner or Trustee	% Ownership
	ZANDIAN, RESA et al	
	FOUGHANI, NILOOFAR	

079-150-09 1 STATE ROUTE 447
REZA ZANDIAN PO BOX 81624 LAS VEGAS NV 89180 05/12/2009

560 acres

County Home => Assessor's Office => Property Assessment Data Search => Parcel Search => Ownership

APN 079-150-09	Owner or Trustee	% Ownership
	SADRI LIVING TRUST TTEE et al	
	SADRI, TRUSTEE, FRED	33
	ZANDIAN, REZA	33
	KOROGHLI MANAGEMENT TRST, TRST	33
	KOROGHLI, TRUSTEE, RAY TTEE	
	KOROGHLI, TRUSTEE, SATHSOWI T TTEE	

079-150-10 1 STATE ROUTE 447
REZA ZANDIAN PO BOX 81624 LAS VEGAS NV 89180 05/12/2009

639 acres

[County Home](#) => [Assessor's Office](#) => [Property Assessment Data Search](#) => [Parcel Search](#) => [Ownership](#)

APN 079-150-10

Owner or Trustee % Ownership

SADRI LIVING TRUST TTEE et al	
SADRI, TRUSTEE, FRED	33
ZANDIAN, REZA	33
KOROGHLI MANAGEMENT TRUST, TRST	33
KOROGHLI, TRUSTEES, RAY TTEE	
KOROGHLI, TRUSTEE, SATHSOWI T TTEE	

079-150-13 1 STATE ROUTE 447
REZA ZANDIAN PO BOX 81624 LAS VEGAS NV 89180 05/12/2009

560 acres

[County Home](#) => [Assessor's Office](#) => [Property Assessment Data Search](#) => [Parcel Search](#) => [Ownership](#)

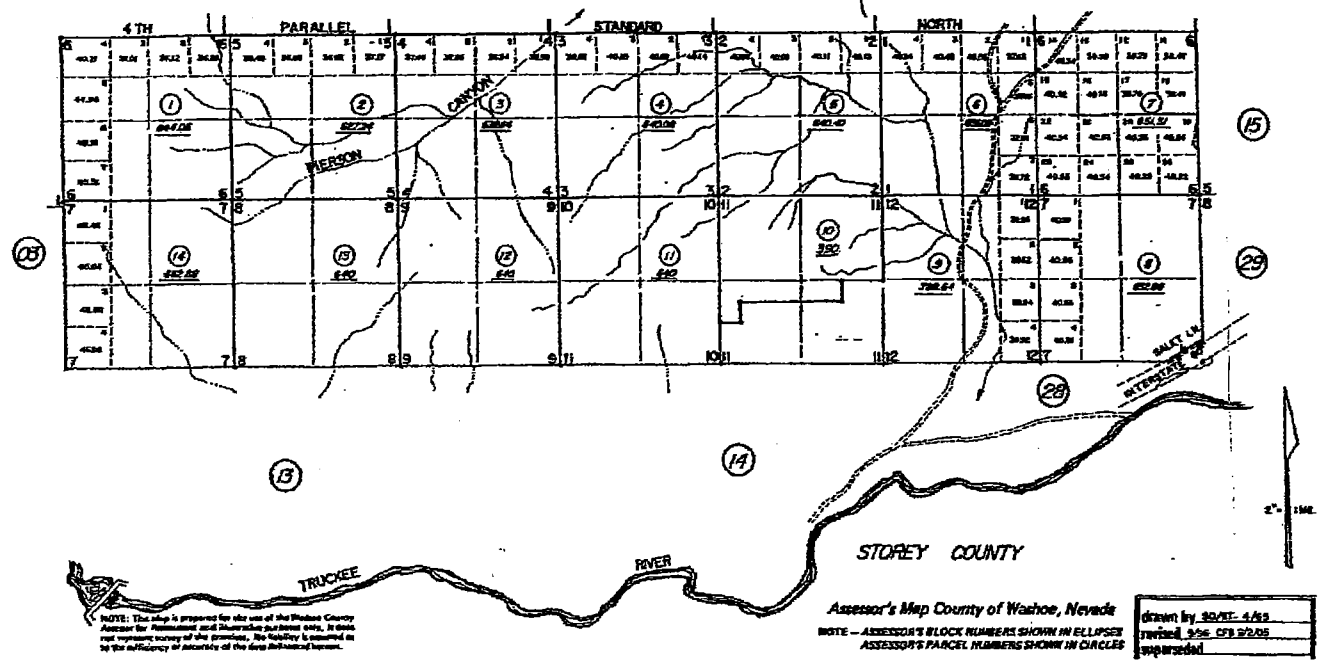
APN 079-150-13

Owner or Trustee % Ownership

SADRI LIVING TRUST TTEE et al	
SADRI, TRUSTEE, FRED	33
ZANDIAN, REZA	33
KOROGHLI MGMT TRUST, TRST	33
KOROGHLI, TTEE, RAY TTEE	
KOROGHLI, TTEE, SATHSOWI T TTEE	

PORTION OF N²-T.20N.-R.23E.
SECTIONS 6 & 7 - T.20N.-R.24E.

BOOK 79



084-040-02 1 PIERSON CANYON RD
REZA ZANDIAN PO BOX 81624 LAS VEGAS NV 89180 05/12/2009

627 acres

County Home => Assessor's Office => Property Assessment Data Search => Parcel Search => Ownership

Owner or Trustee	% Ownership
SADRI LIVING TRUST TTEE et al	
SADRI, TRUSTEE, FRED	33
ZANDIAN, REZA	33
KOROGHLI MGMT TRST, TRST	33
KOROGHLI, TTEE, RAY TTEE	
KOROGHLI, TTEE, SATHSOWI T TTEE	

084-040-04 1 E INTERSTATE 80
REZA ZANDIAN PO BOX 81624 LAS VEGAS NV 89180 05/12/2009

640 acres

[County Home](#) => [Assessor's Office](#) => [Property Assessment Data Search](#) => [Parcel Search](#) => [Ownership](#)

APN 084-040-04	
Owner or Trustee	% Ownership
SADRI LIVING TRUST TTEE et al	
SADRI, TRUSTEE, FRED	33
ZANDIAN, REZA	33
KOROGHLI MGMT TRST, TRST	33
KOROGHLI, TTEE, RAY TTEE	
KOROGHLI, TTEE, SATHSOWI T TTEE	

084-040-06 1 E INTERSTATE 80
REZA ZANDIAN PO BOX 81624 LAS VEGAS NV 89180 05/12/2009

633 acres

[County Home](#) => [Assessor's Office](#) => [Property Assessment Data Search](#) => [Parcel Search](#) => [Ownership](#)

APN 084-040-06	
Owner or Trustee	% Ownership
SADRI LIVING TRUST TTEE et al	
SADRI, TRUSTEE, FRED	33
ZANDIAN, REZA	33
KOROGHLI MGMT TRST, TRST	33
KOROGHLI, TTEE, RAY TTEE	
KOROGHLI, TTEE, SATHSOWI T	

084-040-10 1 E INTERSTATE 80
REZA ZANDIAN PO BOX 81624 LAS VEGAS NV 89180 05/12/2009

390 acres

County Home => Assessor's Office => Property Assessment Data Search => Parcel Search => Ownership

APN 084-040-10	
Owner or Trustee	% Ownership
SADRI LIVING TRUST TTEE et al	
SADRI, TRUSTEE, FRED	33
ZANDIAN, REZA	33
KOROGHLI MGMT TRST, TRST	33
KOROGHLI, TTEE, RAY TTEE	
KOROGHLI, TTEE, SATHSOWI T TTEE	

084-130-07 1 E INTERSTATE 80
REZA ZANDIAN PO BOX 81624 LAS VEGAS NV 89180 05/12/2009

275 acres

County Home => Assessor's Office => Property Assessment Data Search => Parcel Search => Ownership

APN 084-130-07	
Owner or Trustee	% Ownership
SADRI LIVING TRUST TTEE et al	
SADRI, TRUSTEE, FRED	33
ZANDIAN, REZA	33
KOROGHLI MGMT TRUST, TRST	33
KOROGHLI, TTEE, RAY TTEE	
KOROGHLI, TTEE, SATHSOWI T TTEE	

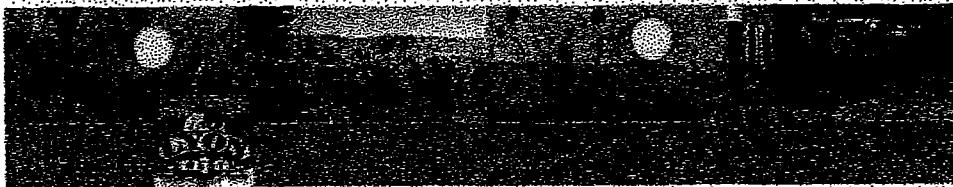
084-140-17 1 E IN RSTATE 80
REZA ZANDIAN PO BOX 81624 LAS VEGAS NV 89180 05/12/2009

160 acres

County Home => Assessor's Office => Property Assessment Data Search => Parcel Search => Ownership

APN 084-140-17	
Owner or Trustee	% Ownership
SADRI LIVING TRUST TTEE et al	
SADRI, TRUSTEE, FRED	33
ZANDIAN, REZA	33
KOROGHLI MGMT TRST, TRST	33
KOROGHLI, TTEE, RAY TTEE	
KOROGHLI, TTEE, SATHSOWI T TTEE	





Real Property Inquiry

Search for Real Property (Land, Improvements, etc.)

Order List By: Parcel # Owner Name Property Location District

Filters: Limit Selected Parcels to Include (Choose any number):

Parcel #	<input type="text"/>	8-digit #(s), no dashes	Partial Owner Name	<input type="text" value="ZANDIAN"/>
Land Use Code Range	<input type="text"/>	Code Table	examples: SMITH M / ACME MARKETS	
Acreage Range	<input type="text"/>		Partial Property Location	<input type="text"/>
Net Value Range	<input type="text"/>		examples: N MAIN ST / MAPLE DR	
District	<input type="text" value="All"/>			

Search Results - Select for Detail						
Parcel #	Owner Name	Property Location	Dist.	Land Use	Acreage	Net Assessed Value
<u>006-052-04</u>	ZANDIAN, REZA	125 PIKE ST	8.5	140 - Vacant Commercial	.220	15,580
<u>006-052-05</u>	ZANDIAN, REZA	115 PIKE ST	8.5	140 - Vacant Commercial	.220	15,560
<u>006-052-06</u>	ZANDIAN, REZA	105 PIKE ST	8.5	140 - Vacant Commercial	.220	15,560
<u>015-311-18</u>	ZANDIAN, REZA ET AL	HWY 50	8.3	120 - Vacant Single Family	241.790	24,500
<u>015-311-19</u>	ZANDIAN, REZA ET AL	HWY 50	8.3	140 - Vacant Commercial	47.750	16,710
<u>021-451-22</u>	ZANDIAN, REZA ET AL		6.0	120 - Vacant Single Family	40.000	3,360



Parcel Detail for Parcel # 006-052-04

Location

Property Location 125 PIKE ST
 Town DAYTON
 Subdivision DAYTON
 TOWN Lot 4 Block 6
 Property Name
 Remarks

Ownership

Assessed Owner Name ZANDIAN, REZA
 Mailing Address P O BOX 827674
 SAN DIEGO, CA 92192-7674
 Legal Owner Name ZANDIAN, REZA
 Vesting Doc#, Date 342193 02/04/05 Book/Page /
 Map Document #s RS90448

Description

Total Acres .220 Ag Acres .000 W/R Acres .000

Improvements

Single-fam Detached 0 Non-dwell Units 0 Bdrms/Bath 0/00
 Single-fam Attached 0 MH Hookups 0 Stories 0
 Multi-fam Units 0 Wells 0
 Mobile Homes 0 Septic Tanks 0
 Total Dwelling Units 0 Bldg Sq Ft 0
 Garage Sq Ft 0 Atch/Detch
 Basement Sq Ft 0 Finished 0

Appraisal Classifications

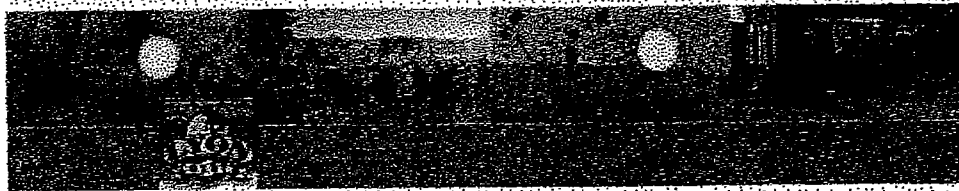
Current Land Use Code 140
 Zoning C1
 Re-appraisal Group 5 Re-appraisal Year 2006
 Orig Constr Year Weighted Year

Assessed Valuation

Assessed Values	2012-13	2011-12	2010-11
Land	15,560	15,560	15,560
Improvements	0	0	0
Personal Property	0	0	0
Ag Land	0	0	0
Exemptions	0	0	0
Net Assessed Value	15,560	15,560	15,560
Increased (New) Values			
Land	0	0	0
Improvements	0	0	0
Personal Property	0	0	0

Taxable Valuation

Taxable Values	2012-13	2011-12	2010-11
Land	44,457	44,457	44,457
Improvements	0	0	0
Personal Property	0	0	0
Ag Land	0	0	0
Exemptions	0	0	0
Net Taxable Value	44,457	44,457	44,457
Increased (New) Values			
Land	0	0	0
Improvements	0	0	0
Personal Property	0	0	0



Parcel Detail for Parcel # 006-052-05

Location	Ownership
Property Location 115 PIKE ST Town DAYTON Subdivision DAYTON TOWN Lot 5 Block 6 Property Name Remarks	Assessed Owner Name ZANDIAN, REZA Mailing Address P O BOX 927674 SAN DIEGO, CA 92192-7674 Legal Owner Name ZANDIAN, REZA Vesting Doc#, Date 342193 02/04/05 Book/Page / Map Document #s RS90448

Description	Appraisal Classifications
Total Acres .220 Ag Acres .000 W/R Acres .000 Improvements Single-fam Detached 0 Non-dwell Units 0 Bdrm/Bath 0/.00 Single-fam Attached 0 MH Hookups 0 Stories .0 Multi-fam Units 0 Wells 0 Mobile Homes 0 Septic Tanks 0 Total Dwelling Units 0 Bldg Sq Ft 0 Garage Sq Ft 0 Atch/Detch Basement Sq Ft 0 Finished 0	Current Land Use Code 140 Zoning C2 Re-appraisal Group 5 Re-appraisal Year 2008 Orig Constr Year Weighted Year

Assessed Valuation			
Assessed Values	2012-13	2011-12	2010-11
Land	15,560	15,560	15,560
Improvements	0	0	0
Personal Property	0	0	0
Ag Land	0	0	0
Exemptions	0	0	0
Net Assessed Value	15,560	15,560	15,560
Increased (New) Values			
Land	0	0	0
Improvements	0	0	0
Personal Property	0	0	0

Taxable Valuation			
Taxable Values	2012-13	2011-12	2010-11
Land	44,457	44,457	44,457
Improvements	0	0	0
Personal Property	0	0	0
Ag Land	0	0	0
Exemptions	0	0	0
Net Taxable Value	44,457	44,457	44,457
Increased (New) Values			
Land	0	0	0
Improvements	0	0	0
Personal Property	0	0	0



Parcel Detail for Parcel # 006-052-06

Location		Ownership	
Property Location	105 PIKE ST	Assessed Owner Name	ZANDIAN, REZA
Town	DAYTON	Mailing Address	P O BOX 927674 SAN DIEGO, CA 92192-7674
Subdivision	DAYTON TOWN Lot 6 Block 6	Legal Owner Name	ZANDIAN, REZA
Property Name		Vesting Doc#, Date	342193 02/04/05 Book/Page /
Remarks		Map Document #s	RS90448

Description		Appraisal Classifications	
Total Acres	.220	Current Land Use Code	140
Ag Acres	.000	Zoning	C2
W/R Acres	.600	Re-appraisal Group	5
<u>Improvements</u>		Orig Constr Year	
Single-fam Detached	0	Re-appraisal Year	2008
Single-fam Attached	0	Weighted Year	
Multi-fam Units	0		
Mobile Homes	0		
Total Dwelling Units	0		
	Non-dwell Units 0		
	MH Hookups 0		
	Bdrm/Bath 0/.00		
	Stories .0		
	Wells 0		
	Septic Tanks 0		
	Bldg Sq Ft 0		
	Garage Sq Ft 0		
	Atch/Detch		
	Basement Sq Ft 0		
	Finished 0		

Assessed Valuation				Taxable Valuation			
Assessed Values	2012-13	2011-12	2010-11	Taxable Values	2012-13	2011-12	2010-11
Land	15,560	15,560	15,560	Land	44,457	44,457	44,457
Improvements	0	0	0	Improvements	0	0	0
Personal Property	0	0	0	Personal Property	0	0	0
Ag Land	0	0	0	Ag Land	0	0	0
Exemptions	0	0	0	Exemptions	0	0	0
Net Assessed Value	15,560	15,560	15,560	Net Taxable Value	44,457	44,457	44,457
<u>Increased (New) Values</u>				<u>Increased (New) Values</u>			
Land	0	0	0	Land	0	0	0
Improvements	0	0	0	Improvements	0	0	0
Personal Property	0	0	0	Personal Property	0	0	0



Parcel Detail for Parcel # 015-311-18

Location	
Property Location	HWY 50
Town	STAGECOACH
Subdivision	Lot Block
Property Name	
Remarks	

Ownership	
Assessed Owner Name	ZANDIAN, REZA ET AL
Mailing Address	P O BOX 927674
Add'l Owners	SAN DIEGO, CA 92192-7674
Legal Owner Name	ZANDIAN, REZA ET AL
Vesting Doc#, Date	344412 03/03/05 Book/Page /
Map Document #s	RS332209

Description		
Total Acres	241.790	Ag Acres .000 W/R Acres .000
Improvements		
Single-fam Detached 0	Non-dwell Units 0	Bdrm/Bath 0/.00
Single-fam Attached 0	MH Hookups 0	Stories .0
Multi-fam Units 0	Wells 0	
Mobile Homes 0	Septic Tanks 0	
Total Dwelling Units 0	Bldg Sq Ft 0	Atch/Detch
	Garage Sq Ft 0	Finished 0
	Basement Sq Ft 0	

Appraisal Classifications	
Current Land Use Code	120
Zoning	RR3
Re-appraisal Group	1
Orig Constr Year	
Re-appraisal Year	2009
Weighted Year	

Assessed Valuation			
Assessed Values	2012-13	2011-12	2010-11
Land	24,500	24,500	24,500
Improvements	0	0	0
Personal Property	0	0	0
Ag Land	0	0	0
Exemptions	0	0	0
Net Assessed Value	24,500	24,500	24,500
Increased (New) Values			
Land	0	0	0
Improvements	0	0	0
Personal Property	0	0	0

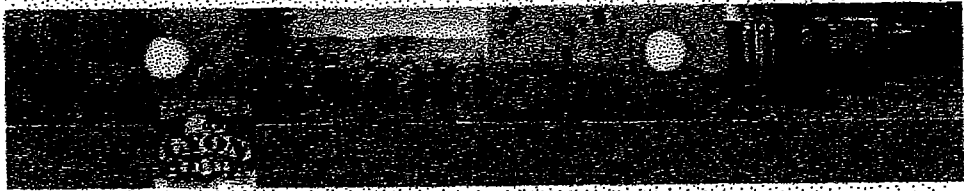
Taxable Valuation			
Taxable Values	2012-13	2011-12	2010-11
Land	70,000	70,000	70,000
Improvements	0	0	0
Personal Property	0	0	0
Ag Land	0	0	0
Exemptions	0	0	0
Net Taxable Value	70,000	70,000	70,000
Increased (New) Values			
Land	0	0	0
Improvements	0	0	0
Personal Property	0	0	0

Ownership History for Parcel # 015-311-18

Current Owners	
Name	From
EL-SABAWI, RASHAD TR	2006
EL-SABAWI, REEM TR	2006
FAYEGHI, JOHNATHON	2006
EAGLES NEST LLC	2006
ZANDIAN, REZA ET AL 8775 COSTA VERDE APT 1416 SAN DIEGO, CA 92122-0000	2005
FOUGHANI, NILOOFAR	2005
ABRISHAMI, ELIAS	2005
ABRISHAMI, MONOO	2005
ABRISHAMI, ENAYAT	2005
ABRISHAMI, NAJMA	2005

Prior Owners		
Name	From	To
DEAD DOG RANCH LLC % LORETTA MC INTIRE 804 RED'S GRADE CARSON CITY, NV 89703	1997	2005

NOTE: This is not a complete history and should not be used in place of a title search.



Parcel Detail for Parcel # 015-311-19

Location

Property Location HWY 50
 Town STAGECOACH
 Subdivision Lot Block
 Property Name
 Remarks ZONE CHANGE FROM RR3 TO C2 6/1/2006

Ownership

Assessed Owner Name ZANDIAN, REZA ET AL
 Mailing Address P O BOX 827674
 Addtl Owners SAN DIEGO, CA 92192-7674
 Legal Owner Name ZANDIAN, REZA ET AL
 Vesting Doc#, Date 344412 03/03/05 Book/Page /
 Map Document #s RS332208

Description

Total Acres 47.750 Ag Acres .000 WR Acres .000

Improvements

Single-fam Detached 0	Non-dwell Units 0	Bdm/Bath 0/.00
Single-fam Attached 0	MH Hookups 0	Stories .0
Multi-fam Units 0	Wells 0	
Mobile Homes 0	Septic Tanks 0	
Total Dwelling Units 0	Bldg Sq Ft 0	
	Garage Sq Ft 0	Atch/Detch
	Basement Sq Ft 0	Finished 0

Appraisal Classifications

Current Land Use Code 140
 Zoning C2
 Re-appraisal Group 1 Re-appraisal Year 2009
 Orig Constr Year Weighted Year

Assessed Valuation

Assessed Values	2012-13	2011-12	2010-11
Land	16,710	16,710	16,710
Improvements	0	0	0
Personal Property	0	0	0
Ag Land	0	0	0
Exemptions	0	0	0
Net Assessed Value	16,710	16,710	16,710
Increased (New) Values			
Land	0	0	0
Improvements	0	0	0
Personal Property	0	0	0

Taxable Valuation

Taxable Values	2012-13	2011-12	2010-11
Land	47,743	47,743	47,743
Improvements	0	0	0
Personal Property	0	0	0
Ag Land	0	0	0
Exemptions	0	0	0
Net Taxable Value	47,743	47,743	47,743
Increased (New) Values			
Land	0	0	0
Improvements	0	0	0
Personal Property	0	0	0

Ownership History for Parcel # 015-311-19

Current Owners	
Name	From
EL-SABAWI, RASHAD TR	2006
EL-SABAWI, REEM TR	2006
FAYEGHI, JOHNATHON	2006
EAGLES NEST LLC	2006
ZANDIAN, REZA ET AL 8775 COSTA VERDE APT 1416 SAN DIEGO, CA 92122-0000	2005
FOUGHANI, NILOOFAR	2005
ABRISHAMI, ELIAS	2005
ABRISHAMI, MINOO	2005
ABRISHAMI, ENAYAT	2005
ABRISHAMI, NAIMA	2005

Prior Owners		
Name	From	To
DEAD DOG RANCH LLC % LORETTA MC INTIRE 804 RED'S GRADE CARSON CITY, NV 89703	1997	2005

NOTE: This is not a complete history and should not be used in place of a title search.





Parcel Detail for Parcel # 021-451-22

Location	Ownership																																																																																								
Property Location Town FERNLEY Subdivision Lot Block Property Name Remarks	Assessed Owner Name ZANDIAN, REZA ET AL Mailing Address P O BOX 927674 SAN DIEGO, CA 92192-7874 Legal Owner Name ZANDIAN, REZA ET AL Vesting Doc#, Date 358791 07/19/05 Book/Page / Map Document #s																																																																																								
Description	Appraisal Classifications																																																																																								
Total Acres 40.000 Ag Acres .000 W/R Acres .000 <u>Improvements</u> Single-fam Detached 0 Non-dwell Units 0 Bdrm/Bath 0/00 Single-fam Attached 0 MH Hookups 0 Stories .0 Multi-fam Units 0 Wells 0 Mobile Homes 0 Septic Tanks 0 Total Dwelling Units 0 Bldg Sq Ft 0 Garage Sq Ft 0 Atch/Detch Basement Sq Ft 0 Finished 0	Current Land Use Code 120 Zoning RRS Re-appraisal Group 4 Re-appraisal Year 2007 Orig Constr Year Weighted Year																																																																																								
Assessed Valuation	Taxable Valuation																																																																																								
<table style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align:left;">Assessed Values</th> <th style="text-align:right;">2012-13</th> <th style="text-align:right;">2011-12</th> <th style="text-align:right;">2010-11</th> </tr> </thead> <tbody> <tr> <td>Land</td> <td style="text-align:right;">3,360</td> <td style="text-align:right;">3,360</td> <td style="text-align:right;">3,360</td> </tr> <tr> <td>Improvements</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> </tr> <tr> <td>Personal Property</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> </tr> <tr> <td>Ag Land</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> </tr> <tr> <td>Exemptions</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> </tr> <tr> <td>Net Assessed Value</td> <td style="text-align:right;">3,360</td> <td style="text-align:right;">3,360</td> <td style="text-align:right;">3,360</td> </tr> <tr> <td colspan="4">Increased (New) Values</td> </tr> <tr> <td>Land</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> </tr> <tr> <td>Improvements</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> </tr> <tr> <td>Personal Property</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> </tr> </tbody> </table>	Assessed Values	2012-13	2011-12	2010-11	Land	3,360	3,360	3,360	Improvements	0	0	0	Personal Property	0	0	0	Ag Land	0	0	0	Exemptions	0	0	0	Net Assessed Value	3,360	3,360	3,360	Increased (New) Values				Land	0	0	0	Improvements	0	0	0	Personal Property	0	0	0	<table style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align:left;">Taxable Values</th> <th style="text-align:right;">2012-13</th> <th style="text-align:right;">2011-12</th> <th style="text-align:right;">2010-11</th> </tr> </thead> <tbody> <tr> <td>Land</td> <td style="text-align:right;">9,600</td> <td style="text-align:right;">9,600</td> <td style="text-align:right;">9,600</td> </tr> <tr> <td>Improvements</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> </tr> <tr> <td>Personal Property</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> </tr> <tr> <td>Ag Land</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> </tr> <tr> <td>Exemptions</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> </tr> <tr> <td>Net Taxable Value</td> <td style="text-align:right;">9,600</td> <td style="text-align:right;">9,600</td> <td style="text-align:right;">9,600</td> </tr> <tr> <td colspan="4">Increased (New) Values</td> </tr> <tr> <td>Land</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> </tr> <tr> <td>Improvements</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> </tr> <tr> <td>Personal Property</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> <td style="text-align:right;">0</td> </tr> </tbody> </table>	Taxable Values	2012-13	2011-12	2010-11	Land	9,600	9,600	9,600	Improvements	0	0	0	Personal Property	0	0	0	Ag Land	0	0	0	Exemptions	0	0	0	Net Taxable Value	9,600	9,600	9,600	Increased (New) Values				Land	0	0	0	Improvements	0	0	0	Personal Property	0	0	0
Assessed Values	2012-13	2011-12	2010-11																																																																																						
Land	3,360	3,360	3,360																																																																																						
Improvements	0	0	0																																																																																						
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Land	0	0	0																																																																																						
Improvements	0	0	0																																																																																						
Personal Property	0	0	0																																																																																						

Ownership History for Parcel # 021-451-22

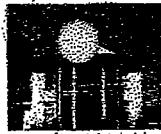
Current Owners	
Name	From
ZANDIAN, REZA ET AL 8775 COSATA VERDE STE 1416 SAN DIEGO, CA 92122-0000	2005
FOUSHANI, NILOOFAR	2005

Prior Owners		
Name	From	To
ARNOLD, JACK G 10410 98 ST ANDERSON ISLAND, WA 98303-0000	2003	2005
EVANS, INGRID P O BOX 1182 RENO, NV 89504	1986	2003
EVANS, LAWRENCE & INGRID P O BOX 1182 RENO, NV 89504	1986	2003

NOTE: This is not a complete history and should not be used in place of a title search.







CHURCHILL COUNTY

Office of the Assessor

Parcel Detail for Parcel # 007-151-77

Location	
Property Location	8825 BRUSH GARDEN DR
Town	[REDACTED]
Subdivision M&B Lot Block	[REDACTED]
Property Name	[REDACTED]
Remarks SPLIT PURSUANT TO DEED	

Ownership	
Assessed Owner Name	ZANDIAN REZA & NILOOFAR
Mailing Address P O BOX 927674	[REDACTED]
Addl Owners	SAN DIEGO CA 92192-7674
Legal Owner Name	ZANDIAN REZA & NILOOFAR
Vesting Doc#, Date	384273 07/27/06 Book/Page /
Map Document #s	194366

Description		
Total Acres 6.750	Ag Acres .000	W/R Acres .000
<u>Improvements</u>		
Single-fam Detached 0	Non-dwell Units 0	Bdrm/Bath 0/00
Single-fam Attached 0	MH Hookups 0	Stories .0
Multi-fam Units 0	Wells 0	
Mobile Homes 0	Septic Tanks 0	
Total Dwelling Units 0	Bldg Sq Ft 0	
	Garage Sq Ft 0	Atch/Detch
	Basement Sq Ft 0	Finished 0

Appraisal Classifications	
Current Land Use Code 100	[REDACTED]
Zoning C2	
Re-appraisal Group 3	Re-appraisal Year 2011
Orig Constr Year	Weighted Year

Assessed Valuation			
Assessed Values	2012-13	2011-12	2010-11
Land	8,820	8,820	8,820
Improvements	0	0	0
Personal Property	0	0	0
Ag Land	0	0	0
Exemptions	0	0	0
Net Assessed Value	8,820	8,820	8,820
Increased (New) Values			
Land	0	0	0
Improvements	0	0	0
Personal Property	0	0	0

Taxable Valuation			
Taxable Values	2012-13	2011-12	2010-11
Land	25,200	25,200	25,200
Improvements	0	0	0
Personal Property	0	0	0
Ag Land	0	0	0
Exemptions	0	0	0
Net Taxable Value	25,200	25,200	25,200
Increased (New) Values			
Land	0	0	0
Improvements	0	0	0
Personal Property	0	0	0



CHURCHILL COUNTY

Office of the Assessor

Parcel Detail for Parcel # 009-331-04

Location		Ownership	
Property Location 29-20-27		Assessed Owner Name ZANDIAN R & FOUGHAN N	
Town		Mailing Address P O BOX 927674	
Subdivision 29-20-27		Addl Owners SAN DIEGO CA 92192-7674	
NW1/4 Lot Block			
Property Name		Legal Owner Name ZANDIAN R & FOUGHAN N	
		Vesting Doc#, Date 372986 07/06/05 Book/Page /	
Remarks		Map Document #s	
Description		Appraisal Classifications	
Total Acres 50.000	Ag Acres .000 W/R Acres .000	Current Land Use Code 100	
<u>Improvements</u>		Zoning RR20	
Single-fam Detached 0	Non-dwell Units 0 Bdrm/Bath 0/.00	Re-appraisal Group 3	Re-appraisal Year 2011
Single-fam Attached 0	MH Hookups 0 Stories .0	Orig Constr Year	Weighted Year
Multi-fam Units 0	Wells 0		
Mobile Homes 0	Septic Tanks 0		
Total Dwelling Units 0	Bldg Sq Ft 0		
	Garage Sq Ft 0 Atch/Detch		
	Basement Sq Ft 0 Finished 0		
Assessed Valuation		Taxable Valuation	
Assessed Values	2012-13 2011-12 2010-11	Taxable Values	2012-13 2011-12 2010-11
Land	2,625 2,625 6,300	Land	7,500 7,500 18,000
Improvements	0 0 0	Improvements	0 0 0
Personal Property	0 0 0	Personal Property	0 0 0
Ag Land	0 0 0	Ag Land	0 0 0
Exemptions	0 0 0	Exemptions	0 0 0
Net Assessed Value	2,625 2,625 6,300	Net Taxable Value	7,500 7,500 18,000
Increased (New) Values		Increased (New) Values	
Land	0 0 0	Land	0 0 0
Improvements	0 0 0	Improvements	0 0 0
Personal Property	0 0 0	Personal Property	0 0 0



Parcel Detail for Parcel # 001-660-034

Location		Ownership		
Property Location EL ARMUTH DR Town ELKO CITY		Assessed Owner Name ZANDIAN, REZA ET AL		
Subdivision Lot Block Property Name		Mailing Address PO BOX 927674 SAN DIEGO CA 92192-7674		
		Legal Owner Name ZANDIAN, REZA ET AL		
		Vesting Doc#, Date 560545 09/25/06 Book/Page /		
		Map Document #s		
Description		Appraisal Classifications		
Total Acres 17.600 Ag Acres .000 W/R Acres .000		Current Land Use Code 120		
Improvements		Zoning R RE		
Single-fam Detached 0	Non-dwell Units 0 Bdrm/Bath 0/.00	Re-appraisal Group Y	Re-appraisal Year 2009	
Single-fam Attached 0	MH Hookups 0 Stories .0	Orig Constr Year	Weighted Year	
Multi-fam Units 0	Wells 0			
Mobile Homes 0	Septic Tanks 0			
Total Dwelling Units 0	Bldg Sq Ft 0			
	Garage Sq Ft 0 Attch/Detch			
	Basement Sq Ft 0 Finished 0			
Assessed Valuation		Taxable Valuation		
Assessed Values	2012-13	2011-12	2010-11	
Land	24,640	24,640	70,400	70,400
Improvements	0	0	0	0
Personal Property	0	0	0	0
Ag Land	0	0	0	0
Exemptions	0	0	0	0
Net Assessed Value	24,640	24,640	70,400	70,400
Increased (New) Values				
Land	0	0	0	0
Improvements	0	0	0	0
Personal Property	0	0	0	0

.....



11000 RENO HIGHWAY, FALLON, L.L.C.

Business Entity Information			
Status:	Active	File Date:	6/09/2005
Type:	Domestic Limited-Liability Company	Entity Number:	E0363852005-8
Qualifying State:	NV	List of Officers Due:	6/30/2011
Managed By:	Managers	Expiration Date:	
NV Business ID:	NV20051368188	Business License Exp:	Exempt - 003

Registered Agent Information			
Name:	SEAN S. FAYEGHI	Address 1:	1401 LAS VEGAS BLVD SOUTH
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89104
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	
Mailing Zip Code:			
Agent Type:	Noncommercial Registered Agent		

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

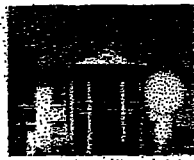
Officers				<input type="checkbox"/> Include Inactive Officers
Manager - SEAN S FAYEGHI				
Address 1:	1401 S LAS VEGAS BLVD	Address 2:		
City:	LAS VEGAS	State:	NV	
Zip Code:	89104	Country:	USA	
Status:	Active	Email:		
Manager - SHA REZAIE				
Address 1:	1401 S LAS VEGAS BLVD	Address 2:		
City:	LAS VEGAS	State:	NV	
Zip Code:	89104	Country:	USA	
Status:	Active	Email:		
Manager - REZA ZANDIAN				
Address 1:	1401 S LAS VEGAS BLVD	Address 2:		
City:	LAS VEGAS	State:	NV	
Zip Code:	89104	Country:	USA	
Status:	Active	Email:		

Actions/Amendments			
Action Type:	Articles of Organization		
Document Number:	20050222393-68	# of Pages:	1
File Date:	6/09/2005	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		

Document Number:	20050222394-79	# of Pages:	2
File Date:	6/2005	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20060232918-43	# of Pages:	1
File Date:	4/12/2006	Effective Date:	
(No notes for this action)			
Action Type:	Amended List		
Document Number:	20060601627-50	# of Pages:	1
File Date:	9/19/2006	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20070460170-57	# of Pages:	1
File Date:	7/02/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20080514441-09	# of Pages:	1
File Date:	7/30/2008	Effective Date:	
08/09			
Action Type:	Annual List		
Document Number:	20090396003-02	# of Pages:	1
File Date:	4/30/2009	Effective Date:	
09-10			
Action Type:	Annual List		
Document Number:	20100743536-41	# of Pages:	1
File Date:	10/01/2010	Effective Date:	
(No notes for this action)			

LEGAL DIMENSIONS
800-535-7752





CHURCHILL COUNTY

Office of the Assessor

[Assessor Home](#)[Back to Search List](#)[Personal Property](#)[Sales Data](#)[Secured Tax Inquiry](#)[Recorder Search](#)

Parcel Detail for Parcel # 007-091-12

Location

Property Location 11000 RENO HWY

Town HAZEN

Subdivision M&B Lot Block

Property Name

Remarks

[Add'l Addresses](#)[Assessor Maps](#)[Legal Description](#)

Ownership

Assessed Owner Name 11000 RENO HIGHWAY
FALLON LLCMailing Address 1401 LAS VEGAS BLVD S
LAS VEGAS NV 89104-1327Legal Owner Name 11000 RENO HIGHWAY
FALLON LLC

Vesting Doc#, Date 372233 06/22/05 Book/Page /

Map Document #s

[Ownership History](#)[Document History](#)

Description

Total Acres 640.000 Ag Acres .000 W/R Acres .000

Improvements

Single-fam Detached 0 Non-dwell Units 0 Bdrm/Bath 0/00

Single-fam Attached 0 MH Hookups 0 Stories .0

Multi-fam Units 0 Wells 0

Mobile Homes 0 Septic Tanks 0

Total Dwelling Units 0 Bldg Sq Ft 0

Garage Sq Ft 0 Atch/Detch

[Improvement List](#) Basement Sq Ft 0 Finished 0

Appraisal Classifications

Current Land Use Code 180

[Code Table](#)

Zoning RR20

Re-appraisal Group 3

Re-appraisal Year 2011

Orig Constr Year

Weighted Year

Assessed Valuation

Assessed Values	2012-13	2011-12	2010-11
Land	56,000	56,000	201,600
Improvements	458	468	530
Personal Property	0	0	0
Ag Land	0	0	0
Exemptions	0	0	0
Net Assessed Value	56,458	56,468	202,130

Increased (New) Values

Land	0	0	0
Improvements	0	0	0
Personal Property	0	0	0

Taxable Valuation

Taxable Values	2012-13	2011-12	2010-11
Land	160,000	160,000	576,000
Improvements	1,309	1,337	1,514
Personal Property	0	0	0
Ag Land	0	0	0
Exemptions	0	0	0
Net Taxable Value	161,309	161,337	577,514

Increased (New) Values

Land	0	0	0
Improvements	0	0	0
Personal Property	0	0	0



ISFITS DEVELOPMENT L.L.C.

Business Entity Information			
Status:	Active	File Date:	8/26/2005
Type:	Domestic Limited-Liability Company	Entity Number:	E0571202005-3
Qualifying State:	NV	List of Officers Due:	8/31/2011
Managed By:	Managers	Expiration Date:	
NV Business ID:	NV20051069626	Business License Exp:	Exempt - 003

Registered Agent Information			
Name:	REZA ZANDIAN	Address 1:	8350 W. SAHARA AVE SUITE 150
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89117
Phone:		Fax:	
Mailing Address 1:	8 SAN RAMON DR	Mailing Address 2:	
Mailing City:	IRVINE	Mailing State:	CA
Mailing Zip Code:	92612		
Agent Type:	Noncommercial Registered Agent		

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

Officers		<input type="checkbox"/> Include Inactive Officers	
Managing Member - SAEID AMINPOUR			
Address 1:	701 NORTHE CAMDEN DR	Address 2:	
City:	BEVERLY HILLS	State:	CA
Zip Code:	90201	Country:	USA
Status:	Active	Email:	
Managing Member - NICHOLAS ESKANDARI			
Address 1:	433 N CAMDEN STE 400	Address 2:	
City:	BEVERLY HILLS	State:	CA
Zip Code:	90210	Country:	USA
Status:	Active	Email:	
Managing Member - REZA ZANDIAN			
Address 1:	P.O.BOX 927674	Address 2:	
City:	SAN DIEGO	State:	CA
Zip Code:	92192-7674	Country:	USA
Status:	Active	Email:	

Actions\Amendments			
Action Type:	Articles of Organization		
Document Number:	20050351501-12	# of Pages:	1
File Date:	8/26/2005	Effective Date:	
(No notes for this action)			

Action Type:	Annual List	# of Pages:	1
Document Number:	20050356456-56	Effective Date:	
File Date:	8/29/2005		
(No notes for this action)			
Action Type:	Amended List	# of Pages:	1
Document Number:	20050555770-86	Effective Date:	
File Date:	11/16/2005		
(No notes for this action)			
Action Type:	Annual List	# of Pages:	1
Document Number:	20060673303-50	Effective Date:	
File Date:	10/18/2006		
(No notes for this action)			
Action Type:	Annual List	# of Pages:	1
Document Number:	20070683552-98	Effective Date:	
File Date:	10/02/2007		
(No notes for this action)			
Action Type:	Annual List	# of Pages:	1
Document Number:	20080564590-59	Effective Date:	
File Date:	8/25/2008		
08/09			
Action Type:	Annual List	# of Pages:	1
Document Number:	20090676689-23	Effective Date:	
File Date:	9/11/2009		
(No notes for this action)			
Action Type:	Annual List	# of Pages:	1
Document Number:	20100642222-11	Effective Date:	
File Date:	8/26/2010		
(No notes for this action)			



ELKO NORTH 5TH AVE LLC

Business Entity Information			
Status:	Active	File Date:	8/31/2005
Type:	Domestic Limited-Liability Company	Entity Number:	E0580312005-7
Qualifying State:	NV	List of Officers Due:	8/31/2011
Managed By:	Managers	Expiration Date:	
NV Business ID:	NV20051442315	Business License Exp:	Exempt - 003

Registered Agent Information			
Name:	REZA ZANDIAN	Address 1:	8350 W. SAHARA AVE SUITE 150
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89117
Phone:		Fax:	
Mailing Address 1:	7590 FAY AVE, SUITE 401	Mailing Address 2:	
Mailing City:	LA JOLLA	Mailing State:	CA
Mailing Zip Code:	92037		
Agent Type:	Noncommercial Registered Agent		

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

Officers				<input type="checkbox"/> Include Inactive Officers
Managing Member - CHAKAMIAN 2004 TRUST				
Address 1:	7590 FAY AVE, #401	Address 2:		
City:	LA JOLLA	State:	CA	
Zip Code:	92037	Country:		
Status:	Active	Email:		
Managing Member - MOINZADEH FAMILY REVOCABLE TRUST				
Address 1:	7590 FAY AVE, #401	Address 2:		
City:	LA JOLLA	State:	CA	
Zip Code:	92037	Country:		
Status:	Active	Email:		
Managing Member - REZA ZANDIAN				
Address 1:	P.O. BOX 927674	Address 2:		
City:	SAN DIEGO	State:	CA	
Zip Code:	92192	Country:	USA	
Status:	Active	Email:		

Actions/Amendments			
Action Type:	Articles of Organization		
Document Number:	20050364566-57	# of Pages:	2
File Date:	8/31/2005	Effective Date:	
REG MAIL SAE 9-1-05			

<http://nvsos.gov/SOEntitySearch/PrintCorp.aspx?lx&nvq=XKhMrHdBjKn5O9afATh6IA...> 6/20/2011

Action Type:	Initial List	# of Pages:	1
Document Number:	200437973-30	Effective Date:	
File Date:	9/27/2005		
(No notes for this action)			
Action Type:	Annual List	# of Pages:	1
Document Number:	20060673304-61	Effective Date:	
File Date:	10/18/2006		
(No notes for this action)			
Action Type:	Annual List	# of Pages:	1
Document Number:	20070574309-37	Effective Date:	
File Date:	8/20/2007		
07-08			
Action Type:	Annual List	# of Pages:	1
Document Number:	20080564591-60	Effective Date:	
File Date:	8/25/2008		
08/09			
Action Type:	Annual List	# of Pages:	1
Document Number:	20090676691-66	Effective Date:	
File Date:	9/11/2009		
(No notes for this action)			
Action Type:	Annual List	# of Pages:	1
Document Number:	20100642221-00	Effective Date:	
File Date:	8/26/2010		
(No notes for this action)			



STAGECOACH VALLEY LLC.

Business Entity Information			
Status:	Active	File Date:	4/09/2007
Type:	Domestic Limited-Liability Company	Entity Number:	E0263162007-6
Qualifying State:	NV	List of Officers Due:	4/30/2012
Managed By:	Managers	Expiration Date:	
NV Business ID:	NV20071497897	Business License Exp:	Exempt - 003

Registered Agent Information			
Name:	REZA ZANDIAN	Address 1:	8350 W. SAHARA AVENUE
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89117
Phone:		Fax:	
Mailing Address 1:	8775 COSTA VERDE #501	Mailing Address 2:	
Mailing City:	SAN DIEGO	Mailing State:	CA
Mailing Zip Code:	92122		
Agent Type:	Noncommercial Registered Agent		

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

Officers		<input type="checkbox"/> Include Inactive Officers	
Managing Member - BIJAN AKHAVAN			
Address 1:	15456 VENTURA BLVD #300	Address 2:	
City:	SHERMAN OAKS	State:	CA
Zip Code:	91403	Country:	
Status:	Active	Email:	
Managing Member - SASSAN CHAKAMIAN			
Address 1:	7590 FAY AVE. STE 401	Address 2:	
City:	LA JOLLA	State:	CA
Zip Code:	92037	Country:	
Status:	Active	Email:	
Managing Member - REZA ZANDIAN			
Address 1:	830 LAS VEGAS BLVD SOUTH	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89101	Country:	
Status:	Active	Email:	

Actions/Amendments			
Action Type:	Articles of Organization		
Document Number:	20070248707-47	# of Pages:	2
File Date:	4/09/2007	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		

Document Number:	070248709-69	# of Pages:	1
File Date:	9/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20080270927-97	# of Pages:	1
File Date:	4/21/2008	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20090676690-55	# of Pages:	1
File Date:	9/11/2009	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20100642220-99	# of Pages:	1
File Date:	8/26/2010	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20110343835-00	# of Pages:	1
File Date:	5/06/2011	Effective Date:	
11-12			



ROCK AND ROYALTY LC

Business Entity Information			
Status:	Revoked	File Date:	4/28/2008
Type:	Domestic Limited-Liability Company	Entity Number:	E0277292008-8
Qualifying State:	NV	List of Officers Due:	4/30/2009
Managed By:	Managers	Expiration Date:	
NV Business ID:	NV20081306105	Business License Exp:	

Additional Information	
Series LLC (YES if applicable):	YES

Registered Agent Information			
Name:	REZA ZANDIAN	Address 1:	1401 S. LAS VEGAS BLVD
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89104
Phone:		Fax:	
Mailing Address 1:	8775 COSTA VERDE #501	Mailing Address 2:	
Mailing City:	SAN DIEGO	Mailing State:	CA
Mailing Zip Code:	92122		
Agent Type:	Noncommercial Registered Agent		

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

Officers		<input type="checkbox"/> Include Inactive Officers	
Managing Member - NILOOFAR FOUGHANI ZANDIAN			
Address 1:	8775 COSTA VERDE BLVD	Address 2:	#501
City:	SAN DIEGO	State:	CA
Zip Code:	92122	Country:	
Status:	Active	Email:	

Actions/Amendments			
Action Type:	Articles of Organization		
Document Number:	20080290681-46	# of Pages:	2
File Date:	4/28/2008	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		
Document Number:	20080373743-57	# of Pages:	1
File Date:	5/29/2008	Effective Date:	
08-09			



GOLD CANYON DEVELOPMENT LLC

Business Entity Information			
Status:	Default	File Date:	5/27/2004
Type:	Domestic Limited-Liability Company	Entity Number:	LLC11545-2004
Qualifying State:	NV	List of Officers Due:	5/31/2011
Managed By:	Managers	Expiration Date:	5/27/2504
NV Business ID:	NV20041117776	Business License Exp:	

Registered Agent Information			
Name:	ELIAS ABRISHAMI	Address 1:	220 SUSSEX PL
Address 2:		City:	CARSON CITY
State:	NV	Zip Code:	89703
Phone:		Fax:	
Mailing Address 1:	PO BOX 2919	Mailing Address 2:	
Mailing City:	CARSON CITY	Mailing State:	NV
Mailing Zip Code:	89702		
Agent Type:	Noncommercial Registered Agent		

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

Officers				<input type="checkbox"/> Include Inactive Officers
Managing Member - ELIAS ABRISHAMI				
Address 1:	P O BOX 10476	Address 2:		
City:	BEVERLY HILLS	State:	CA	
Zip Code:	90213	Country:		
Status:	Active	Email:		
Managing Member - RAFI ABRISHAMI				
Address 1:	P O BOX 10325	Address 2:		
City:	BEVERLY HILLS	State:	CA	
Zip Code:	90213	Country:		
Status:	Active	Email:		
Managing Member - REZA ZANDIAN				
Address 1:	8775 COSTA VERDE BLVD., #501	Address 2:		
City:	SAN DIEGO	State:	CA	
Zip Code:	92122	Country:		
Status:	Active	Email:		

Actions/Amendments			
Action Type:	Articles of Organization		
Document Number:	LLC11545-2004-001	# of Pages:	1
File Date:	5/27/2004	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		

Document Number:	LLC11545-2004-002	# of Pages:	1
File Date:	7/2004	Effective Date:	
List of Officers for 2004 to 2005			
Action Type:	Registered Agent Change		
Document Number:	LLC11545-2004-003	# of Pages:	1
File Date:	11/16/2004	Effective Date:	
ELIAS ABRISHAMI SUITE #1011			
9550 W. SAHARA AVENUE LAS VEGAS NV 89117 RXS			
ELIAS ABRISHAMI RXS			
RXS			
Action Type:	Annual List		
Document Number:	20050163958-39	# of Pages:	1
File Date:	5/02/2005	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20060176567-90	# of Pages:	1
File Date:	3/20/2006	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20070373918-40	# of Pages:	1
File Date:	5/29/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20080344948-12	# of Pages:	1
File Date:	5/19/2008	Effective Date:	
2008-2009			
Action Type:	Annual List		
Document Number:	20090433604-71	# of Pages:	1
File Date:	5/20/2009	Effective Date:	
09-10			
Action Type:	Annual List		
Document Number:	00002746565-45	# of Pages:	1
File Date:	5/28/2010	Effective Date:	
10-11			



HIGH-TECH DEVELOPMENT LLC

Business Entity Information			
Status:	Dissolved	File Date:	9/22/2004
Type:	Domestic Limited-Liability Company	Entity Number:	LLC21816-2004
Qualifying State:	NV	List of Officers Due:	9/30/2005
Managed By:	Managers	Expiration Date:	9/22/2504
NV Business ID:	NV20041220539	Business License Exp:	

Registered Agent Information			
Name:	ELIAS ABRISHAMI	Address 1:	8350 W SAHARA AVE
Address 2:	STE 150	City:	LAS VEGAS
State:	NV	Zip Code:	89117
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	
Mailing Zip Code:			
Agent Type:	Noncommercial Registered Agent		

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

Officers				<input type="checkbox"/> Include Inactive Officers
Managing Member - ELIAS ABRISHAMI				
Address 1:	PO BOX 2919	Address 2:		
City:	CARSON CITY	State:	NV	
Zip Code:	89702	Country:		
Status:	Active	Email:		
Managing Member - RAFI ABRISHAMI				
Address 1:	PO BOX 2919	Address 2:		
City:	CARSON CITY	State:	NV	
Zip Code:	89702	Country:		
Status:	Active	Email:		
Managing Member - REZA ZANDIAN				
Address 1:	220 SUSSEX PL	Address 2:		
City:	CARSON CITY	State:	NV	
Zip Code:	89703	Country:		
Status:	Active	Email:		

Actions\Amendments			
Action Type:	Articles of Organization		
Document Number:	LLC21816-2004-001	# of Pages:	1
File Date:	9/22/2004	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		

Document Number:	LI 1816-2004-002	# of Pages:	1
File Date:	11/01/2004	Effective Date:	
List of Officers for 2004 to 2005			
Action Type:	Dissolution		
Document Number:	20050090100-27	# of Pages:	1
File Date:	3/18/2005	Effective Date:	
(No notes for this action)			



LYON PARK DEVELOPMENT LLC

Business Entity Information			
Status:	Dissolved	File Date:	9/22/2004
Type:	Domestic Limited-Liability Company	Entity Number:	LLC21824-2004
Qualifying State:	NV	List of Officers Due:	9/30/2005
Managed By:	Managers	Expiration Date:	9/22/2504
NV Business ID:	NV20041220616	Business License Exp:	

Registered Agent Information			
Name:	ELIAS ABRISHAMI	Address 1:	8350 W SAHARA AVE
Address 2:	STE 150	City:	LAS VEGAS
State:	NV	Zip Code:	89117
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	
Mailing Zip Code:			
Agent Type:	Noncommercial Registered Agent		

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

Officers				<input type="checkbox"/> Include Inactive Officers
Managing Member - ELIAS ABRISHAMI				
Address 1:	PO BOX 2919	Address 2:		
City:	CARSON CITY	State:	NV	
Zip Code:	89702	Country:		
Status:	Active	Email:		
Managing Member - RAFI ABRISHAMI				
Address 1:	PO BOX 2919	Address 2:		
City:	CARSON CITY	State:	NV	
Zip Code:	89702	Country:		
Status:	Active	Email:		
Managing Member - REZA ZANDIAN				
Address 1:	220 SUSSEX PL	Address 2:		
City:	CARSON CITY	State:	NV	
Zip Code:	89703	Country:		
Status:	Active	Email:		

Actions/Amendments			
Action Type:	Articles of Organization		
Document Number:	LLC21824-2004-001	# of Pages:	1
File Date:	9/22/2004	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		

Document Number:	21824-2004-002	# of Pages:	1
File Date:	11/01/2004	Effective Date:	
List of Officers for 2004 to 2005			
Action Type:	Dissolution		
Document Number:	20050090105-72	# of Pages:	1
File Date:	3/18/2005	Effective Date:	
(No notes for this action)			



CHUOCHILL PARK DEVELOPMENT LLC

Business Entity Information			
Status:	Dissolved	File Date:	9/22/2004
Type:	Domestic Limited-Liability Company	Entity Number:	LLC21827-2004
Qualifying State:	NV	List of Officers Due:	9/30/2005
Managed By:	Managers	Expiration Date:	9/22/2504
NV Business ID:	NV20041220644	Business License Exp:	

Registered Agent Information			
Name:	ELIAS ABRISHAMI	Address 1:	8350 W SAHARA AVE
Address 2:	STE 150	City:	LAS VEGAS
State:	NV	Zip Code:	89117
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	
Mailing Zip Code:			
Agent Type:	Noncommercial Registered Agent		

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

Officers		<input type="checkbox"/> Include Inactive Officers	
Managing Member - ELIAS ABRISHAMI			
Address 1:	PO BOX 2919	Address 2:	
City:	CARSON CITY	State:	NV
Zip Code:	89702	Country:	
Status:	Active	Email:	
Managing Member - RAFI ABRISHAMI			
Address 1:	PO BOX 2919	Address 2:	
City:	CARSON CITY	State:	NV
Zip Code:	89702	Country:	
Status:	Active	Email:	
Managing Member - REZA ZANDIAN			
Address 1:	220 SUSSEX PL	Address 2:	
City:	CARSON CITY	State:	NV
Zip Code:	89703	Country:	
Status:	Active	Email:	

Actions\Amendments			
Action Type:	Articles of Organization		
Document Number:	LLC21827-2004-001	# of Pages:	1
File Date:	9/22/2004	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		

Document Number:	1827-2004-002	# of Pages:	1
File Date:	11/01/2004	Effective Date:	
List of Officers for 2004 to 2005			
Action Type:	Dissolution		
Document Number:	20050090112-60	# of Pages:	1
File Date:	3/18/2005	Effective Date:	
(No notes for this action)			

LEGAL DIMENSIONS
800-635-7753



SPARKS VILLAGE IOC

Business Entity Information			
Status:	Default	File Date:	12/15/2004
Type:	Domestic Limited-Liability Company	Entity Number:	LLC29380-2004
Qualifying State:	NV	List of Officers Due:	12/31/2010
Managed By:	Managers	Expiration Date:	12/15/2504
NV Business ID:	NV20041295883	Business License Exp:	Exempt - 003

Registered Agent Information			
Name:	SEAN S. FAYEGHI	Address 1:	1401 LAS VEGAS BLVD SOUTH
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89104
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	
Mailing Zip Code:			
Agent Type:	Noncommercial Registered Agent		

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

Officers		<input type="checkbox"/> Include Inactive Officers	
Manager - SEAN S FAYEGHI			
Address 1:	1401 S. LAS VEGAS BLVD	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89104	Country:	
Status:	Active	Email:	
Manager - REZA ZANDIAN			
Address 1:	1401 S. LAS VEGAS BLVD	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89104	Country:	
Status:	Active	Email:	

Actions/Amendments			
Action Type:	Articles of Organization		
Document Number:	LLC29380-2004-001	# of Pages:	1
File Date:	12/15/2004	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		
Document Number:	LLC29380-2004-002	# of Pages:	1
File Date:	12/15/2004	Effective Date:	
List of Officers for 2004 to 2005			
Action Type:	Annual List		
Document Number:	20050561932-73	# of Pages:	1

File Date:	1/9/2005	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20070107298-06	# of Pages:	1
File Date:	2/08/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20070801466-64	# of Pages:	1
File Date:	11/26/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20080805719-20	# of Pages:	1
File Date:	12/10/2008	Effective Date:	
08-09			
Action Type:	Annual List		
Document Number:	20100743562-60	# of Pages:	1
File Date:	10/01/2010	Effective Date:	
(No notes for this action)			

LEGAL DIMENSIONS
500-535-7753



OPTOA TECHNOLOGY CORPORATION

Business Entity Information			
Status:	Revoked	File Date:	10/11/2004
Type:	Domestic Close Corporation	Entity Number:	C27410-2004
Qualifying State:	NV	List of Officers Due:	10/31/2008
Managed By:		Expiration Date:	
NV Business ID:	NV20041618927	Business License Exp:	

Registered Agent Information			
Name:	REZA ZANDIAN	Address 1:	8350 W. SAHARA AVE SUITE 150
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89117
Phone:		Fax:	
Mailing Address 1:	8 SAN RAMON DR	Mailing Address 2:	
Mailing City:	IRVINE	Mailing State:	CA
Mailing Zip Code:	92612		
Agent Type:	Noncommercial Registered Agent		

Financial Information			
No Par Share Count:	10,000.00	Capital Amount:	\$ 0
No stock records found for this company			

Officers				<input type="checkbox"/> Include Inactive Officers
President - REZA ZANDIAN				
Address 1:	8775 COSTA VERDE BLVD #501	Address 2:		
City:	SAN DIEGO	State:	CA	
Zip Code:	92122	Country:	USA	
Status:	Active	Email:		
Secretary - REZA ZANDIAN				
Address 1:	8775 COSTA VERDE BLVD #501	Address 2:		
City:	SAN DIEGO	State:	CA	
Zip Code:	92122	Country:	USA	
Status:	Active	Email:		
Treasurer - REZA ZANDIAN				
Address 1:	8775 COSTA VERDE BLVD #501	Address 2:		
City:	SAN DIEGO	State:	CA	
Zip Code:	92122	Country:	USA	
Status:	Active	Email:		
Director - REZA ZANDIAN				
Address 1:	8775 COSTA VERDE BLVD #501	Address 2:		
City:	SAN DIEGO	State:	CA	
Zip Code:	92122	Country:	USA	
Status:	Active	Email:		

Actions/Amendments			

Action Type:	Articles of Incorporation	
Document Number:	C27410-2004-001	# of Pages: 1
File Date:	10/11/2004	Effective Date:
(No notes for this action)		
Action Type:	Initial List	
Document Number:	C27410-2004-002	# of Pages: 1
File Date:	10/11/2004	Effective Date:
List of Officers for 2004 to 2005		
Action Type:	Annual List	
Document Number:	20050611409-08	# of Pages: 1
File Date:	12/13/2005	Effective Date:
(No notes for this action)		
Action Type:	Amended List	
Document Number:	20060416290-50	# of Pages: 1
File Date:	6/28/2006	Effective Date:
(No notes for this action)		
Action Type:	Annual List	
Document Number:	20060673305-72	# of Pages: 1
File Date:	10/18/2006	Effective Date:
(No notes for this action)		
Action Type:	Annual List	
Document Number:	20070840329-25	# of Pages: 1
File Date:	12/11/2007	Effective Date:
(No notes for this action)		



I-50 PLAZA LLC

Business Entity Information			
Status:	Default	File Date:	2/03/2005
Type:	Domestic Limited-Liability Company	Entity Number:	E0011952005-5
Qualifying State:	NV	List of Officers Due:	2/28/2011
Managed By:	Managers	Expiration Date:	2/03/2505
NV Business ID:	NV20051209794	Business License Exp:	Exempt - 003

Registered Agent Information			
Name:	SEAN S. FAYEGHI	Address 1:	1401 LAS VEGAS BLVD SOUTH
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89104
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	
Mailing Zip Code:			
Agent Type:	Noncommercial Registered Agent		

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

Officers		<input type="checkbox"/> Include Inactive Officers	
Managing Member - SEAN S FAYEGHI			
Address 1:	1401 S. LAS VEGAS BLVD.	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89104	Country:	
Status:	Active	Email:	
Managing Member - REZA ZANDIAN			
Address 1:	8350 W. SAHARA AVE.	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89117	Country:	
Status:	Active	Email:	

Actions\Amendments			
Action Type:	Articles of Organization		
Document Number:	20050007640-04	# of Pages:	2
File Date:	2/03/2005	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		
Document Number:	20050007642-26	# of Pages:	1
File Date:	2/03/2005	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20050632605-29	# of Pages:	1

File Date:	1/2005	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20070012183-14	# of Pages:	1
File Date:	1/04/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20080097515-37	# of Pages:	1
File Date:	2/12/2008	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20080806151-81	# of Pages:	1
File Date:	12/10/2008	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20100743512-65	# of Pages:	1
File Date:	10/01/2010	Effective Date:	
(No notes for this action)			



DAYTON PLAZA, L.L.C.

Business Entity Information			
Status:	Default	File Date:	5/18/2005
Type:	Domestic Limited-Liability Company	Entity Number:	E0307202005-3
Qualifying State:	NV	List of Officers Due:	5/31/2011
Managed By:	Managers	Expiration Date:	
NV Business ID:	NV20051324192	Business License Exp:	Exempt - 003

Registered Agent Information			
Name:	SEAN S. FAYEGHI	Address 1:	1401 LAS VEGAS BLVD SOUTH
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89104
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	
Mailing Zip Code:			
Agent Type:	Noncommercial Registered Agent		

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

Officers				<input type="checkbox"/> Include Inactive Officers
Manager - SEAN S FAYEGHI				
Address 1:	1401 LAS VEGAS BLVD. SOUTH	Address 2:		
City:	LAS VEGAS	State:	NV	
Zip Code:	89104	Country:		
Status:	Active	Email:		
Manager - SHAHROKH REZAI				
Address 1:	7353 SINGING TREE ST.	Address 2:		
City:	LAS VEGAS	State:	NV	
Zip Code:	89123	Country:		
Status:	Active	Email:		
Manager - REZA ZANDIAN				
Address 1:	8350 W. SAHARA AVE.	Address 2:	SUITE 150	
City:	LAS VEGAS	State:	NV	
Zip Code:	89117	Country:		
Status:	Active	Email:		

Actions\Amendments			
Action Type:	Articles of Organization		
Document Number:	20050184429-75	# of Pages:	1
File Date:	5/18/2005	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		

Document Number:	200184430-07	# of Pages:	1
File Date:	5/18/2005	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20060282468-48	# of Pages:	1
File Date:	5/03/2006	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20070385782-52	# of Pages:	1
File Date:	5/31/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20080380264-03	# of Pages:	1
File Date:	6/02/2008	Effective Date:	
08/09			
Action Type:	Annual List		
Document Number:	20090396017-67	# of Pages:	1
File Date:	4/30/2009	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20100743576-25	# of Pages:	1
File Date:	10/01/2010	Effective Date:	
(No notes for this action)			



LENO HIGHWAY PLAZA, L.L.C.

Business Entity Information			
Status:	Revoked	File Date:	6/05/2006
Type:	Domestic Limited-Liability Company	Entity Number:	E0416572006-9
Qualifying State:	NV	List of Officers Due:	6/30/2007
Managed By:	Managers	Expiration Date:	
NV Business ID:	NV20061046071	Business License Exp:	

Registered Agent Information			
Name:	SEAN S. FEYEGHI	Address 1:	5945 ROBERT HAMPTON ROAD
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89120
Phone:		Fax:	
Mailing Address 1:	1401 SOUTH LAS VEGAS BLVD	Mailing Address 2:	
Mailing City:	LAS VEGAS	Mailing State:	NV
Mailing Zip Code:	89104		
Agent Type:	Noncommercial Registered Agent		

Financial Information			
No Per Share Count:	0	Capital Amount:	\$ 0
No stock records found for this company			

Officers		<input type="checkbox"/> Include Inactive Officers	
Manager - SEAN S FAYEGHI			
Address 1:	1401 SOUTH LAS VEGAS BLVD	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89104	Country:	
Status:	Active	Email:	
Manager - REZA ZANDIAN			
Address 1:	8775 CASTA VERDE BLVD	Address 2:	SUITE 1416
City:	SAN DIEGO	State:	CA
Zip Code:	92122	Country:	
Status:	Active	Email:	

Actions/Amendments			
Action Type:	Articles of Organization		
Document Number:	20060359719-12	# of Pages:	2
File Date:	6/05/2006	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		
Document Number:	20060359720-44	# of Pages:	1
File Date:	6/05/2006	Effective Date:	
(No notes for this action)			