



DANIEL E. ANGIUS*
PAUL P. TERRY, JR.†
BRADLEY J. EPSTEIN*
JOHN J. STANDER*
JULIE M. MOUSER‡
MICHAEL HARDY‡
KEVIN C. CANTY‡
SUSANA C. CENDEJAS‡
ZER IYER‡
SAM Y. CHON‡
GENEVIEVE D. DONG*
RACHEL SATURN***
TROY R. DICKERSON
M. CATHERINE GARCIA‡
RICHARD V. De GRUCCIO‡
JIMMY SANH L. LY‡
AARON C. YEN*
JORDAN O'BRIEN**

†Also admitted
in California and
Colorado and Texas

*Also admitted
in California

‡Admitted in
California

**Admitted in
California & New York

***Also Admitted
in New York

1120 N. Town Center Dr.
Suite 260
Las Vegas
Nevada 89144

Telephone 702 990 2017
Facsimile 702 990 2018
NVinfo@angius-terry.com

Manteca, CA
Newport Beach, CA
Reno, NV
Roseville, CA
Walnut Creek, CA

December 16, 2013

SENT VIA E-MAIL AND REGULAR U. S. MAIL

Arbitrator William C. Turner, Esq.
59 Oakmarsh Drive
Henderson, Nevada 89074

**Re: Motion for Attorney's Fees and Costs
Solomon v. Palm Hills Homeowners Association, NRED Control # 13-48**

Dear Mr. Turner:

As you know, this office represents the Palm Hills Homeowners Association ("Association"). Pursuant to your instructions given by order in an E-mail dated December 2, 2013, please find the undersigned's Affidavit in Support for Motion for Attorney's Fees and Costs enclosed for your consideration and review.

In addition to the dismissal granted, the Respondent Association additionally seeks a judgment against Claimant Gary Solomon for attorney's fees and costs for the reasons that follow.

As noted in the Motion to Dismiss, the controversy at issue – a mere \$100.00 compliance violation fine – is nominal, was levied several years ago, and could have easily been addressed and most likely resolved with actual ownership in the context of proper administrative proceedings conducted by the Association when this issue was first raised. Instead of divulging any proof of proper authorization/representation of ownership when requested, attempting to attend the scheduled violation hearing, or conferring with a knowledgeable attorney familiar with community association issues, however, Claimant Solomon chose to proceed instead by taking uninformed, litigious actions that collectively required the Association to necessarily respond and defend itself throughout against an individual that did not even have standing as a unit owner to take such actions.

To reiterate the Association's contentions made in the telephonic hearing with you on October 25, 2013, this particular Claimant is not an unsophisticated neophyte when it comes to community association issues. A simple "Google" search reveals that Solomon oversees a well-publicized activist organization in Las Vegas with an agenda to "break apart" Nevada's HOA community association structure. While not singularly dispositive, the Association contends that this particular information, coupled with the communications relayed by Claimant to the undersigned as described in the Motion to Dismiss's supporting Affidavit, collectively point to the method and motive for Claimant's actions.



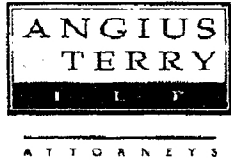
William C. Turner, Esq.
NRED Control #13-48
Motion for Attorney's Fees and Costs

The actions taken by Claimant in this arbitration proceeding alone are illustrative of the Association's contentions regarding Claimant's intentions. To wit, Solomon filed this ADR action – a proceeding normally adjudicated and completed in 3-6 months on average – approximately ten (10) months ago. At the time of this writing, and despite the Arbitrator's specific instructions and deadlines, Claimant has continually delayed these proceedings, and never paid the initial deposit requested and required over four (4) months ago. Moreover, Solomon failed to provide any evidence whatsoever supporting his claims or delays related to the underlying allegations, the Motion to Dismiss, or the telephonic Hearing on October 25th despite repeated requests from both the Arbitrator and this office.

Finally, the juvenile, disruptive behavior displayed by the Claimant during the telephonic Hearing conducted on October 25th and in subsequent E-mails simply confirms the Association's position and Solomon's underlying intentions. The obvious disregard shown for the adjudicatory ADR process mandated by Nevada law, the utter disrespect exhibited towards the Arbitrator and his authority, and the completely meritless slander, libel, and defamation threats made against the Arbitrator and the undersigned during these proceedings collectively speak volumes.

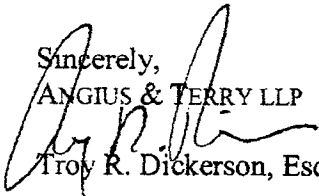
Since a judgment of dismissal has now been granted, the Respondent Association additionally moves for a judgment against the Claimant for attorney's fees and costs as the prevailing party in this meritless action. NRS 38.310 and Nevada Real Estate Division Ombudsman procedural rules required that the underlying action be adjudicated in mandatory ADR arbitration proceedings when it was filed in February 2013. The Association's CC&Rs, Article XXVII, Section 27.1(b) state that "the prevailing party ... shall be entitled to costs of suit and such attorney's fees as the Court may adjudge reasonable and proper." Moreover, NRS 116.3116(7) requires that a judgment or decree in an action brought to enforce/dispute assessed fines "must include costs and reasonable attorney's fees for the prevailing party."

The Association has accrued \$7,197.50 in reasonable attorney's fees and \$150.67 in attorney's costs in order to defend itself against the Claimant's meritless action. These figures do not include fees and costs accrued to defend against the Claimant's unnecessary small claims action, which the Association most likely will never be able



William C. Turner, Esq.
NRED Control #13-48
Motion for Attorney's Fees and Costs

to recoup. The accrued fees and costs are described in the Affidavit of Support of Attorney's Fees and Costs ("Affidavit") enclosed with this correspondence for your review.

Sincerely,
ANGIUS & TERRY LLP

Troy R. Dickerson, Esq.

Attorneys for Palm Hills Homeowners Association
Enclosure

cc: Suzanne LaGrange-Darnell, CAM (via E-mail)
Palm Hills Homeowners Association Board of Directors (via E-mail)
Gary Solomon (via E-mail and regular U. S. Mail)

Gary Phillip Solomon, A.A. B.A., MPH, M.S.W., Ph.D., Ph.D.(abd)

1001 Calico Ridge Drive
Henderson, Nevada 89011

1-702-812-3591 - Cell

1-702-565-6218 - Fax

drgarysolomon@gmail.com

Sunday, April 27, 2014

Chris A Beecroft, Jr.
ADR Commissioner
Eighth Judicial District Court
Phoenix Building
330 S. Third St., #1060
Las Vegas, NV 89155-2377
1-702-671-4493
1-702-671-4484

Phillip J. Patte
State Bar of Nevada
600 East Charleston Blvd.
Las Vegas, NV 89104-1563
1-702-383-2200
1-702-385-2878

George Carter, Attorney at Law
1050 E. Sahara Ave.
Las Vegas, NV 89104
1-702-384 8951

Brian Sandoval
Governor State of Nevada
State Capitol Building
101 N. Carson Street
Carson City, NV 89701
Phone: (775) 684-5670
Fax: (775) 684-5683

Brian Sandoval
Governor State of Nevada
Grant Sawyer State Office Building
555 East Washington Ave., Suite 5100
Las Vegas, NV 89101
Phone: (702)- 486-2500
Fax: (702)- 486-2505

Senior Legal Aid
530 South Las Vegas Blvd., Suite 310
Las Vegas, Nevada 89101
1-(702)- 229-6596
1-(702)- 384-0314

KTNV-TV
3355 S Valley View Blvd
Las Vegas, NV
1-(702)- 871-3345

Christopher J. Lalli
Assistant District Attorney
Office of the District Attorney
200 Lewis Avenue
Las Vegas, NV 89101
1-(702)- 671-2501
1-(702)-455-2294

State of Nevada
Department of Business and Industry
Real Estate Division
2501 E Sahara Ave., Ste. 102,
Las Vegas Nevada 89104-4137
1-(702)-486-4033
1-(702)-486-4275

CBS News
60 Minutes
524 West 57th St.
New York, NY 10019
1-(212)- 975-3247

Palm Hills Homeowners Association(Camco)
5980 S. Durango Dr., #131
Las Vegas, NV 89113
1-(702)- 531-3382

RE: COMPLAINT AGAINST WILLIARM TURNER, ESQ AND TROY DICKERSON, ESQ

1. William Turner was the Arbitrator on my \$100.00 return of fines claim, charged against me by Palm Hills Homeowners Association (the "HOA"), on my property at 700 Leicester, Henderson, Nevada 89002 ("Property").
2. Troy Dickerson (Law firm of Anguis and Terry) represented the HOA.
3. I, Gary Solomon, filed a complaint through Nevada Real Estate Division ("NRED") against my HOA.
4. William Turner was assigned as the Arbitrator on the case.
5. During arbitration William Turner disclosed that Attorney George Carter was his attorney.
6. George Carter was my attorney.
7. George Carter was my tenant at the Property on which the fine was levied.
8. During the only phone call/contact William Turner asked Troy Dickerson and myself if he should recuse himself as the Arbitrator due to a conflict of interest. (I have a witness to this conversation.)
9. Troy Dickerson stated that he felt there was not a conflict of interest.
10. I stated that there was a conflict of interest and demanded that William Turner recues himself. (I have a witness to this conversation.)
11. I demanded that the matter be turned back over to the Ombudsman's office to be heard through the new \$250.00 mediation program.
12. William Turner refused to recues himself and refused to turn the matter over to the Ombudsman's office for the new \$250.00 mediation program.
13. Troy Dickerson demanded that William Turner remain as the Arbitrator.
14. I refused to continue with the Arbitration.
15. William Turner and Troy Dickerson continued the Arbitration without me.
16. William Turner awarded Troy Dickerson **\$7,348.17**, an amount **over 70 times greater** than the amount of my \$100.00 claim; **\$7, 098.17 more than the new Nevada State mediation program would have cost me in total.**
17. William Turner waved his Arbitrator's fees.
18. Now why in the world would William Turner wave his Arbitrator's fees? Was it because there was a conflict of interest?

NECESSARY ACTION

- Suspend or disbar William Turner, Attorney at Law
- Suspend or disbar Troy Dickerson, Attorney at Law
- Remove William Turner as an Arbitrator

All case support documents are available upon request.

Respectfully

Gary Solomon A.A. B.A., MPH, M.S.W., Ph.D., Ph.D.(abd)

1
2 Gary Solomon
3 1001
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7

8 **DISTRICT COURT, LAS VEGAS TOWNSHIP**
9 **CLARK COUNTY, NEVADA**

10 *

11 *

12 *

13 **GARY SOLOMON**

14 Plaintiff,

15 v.

16 **PALM HILLS HOME OWNERS**
17 **ASSOCIATION Inc.**

18 Defendant.
19
20

)
) **CASE NO.:**

)
) **DEPT. NO.:**

11 **STATEMENT OF FACTS**

)
) **DATE:**

)
) **TIME:**

21 **I**

22 **PLAINTIFF'S OPENING STATEMENT**

- 23 1. To date, this matter before the District Court has never been heard.
24 2. Troy Dickerson with the Law Firm of Angius and Terry convinced the Small Claims
25 Court that Plaintiff must go to District Court.
26 3. Troy Dickerson argued the Small Claims Court has no jurisdiction in this \$100.00
27

28 ///

1
2 matter.

3 4. Plaintiff argued since the matter is \$100.00 he had the right, per NRS CHAPTER 73, to
4 be heard in Small Claims Court.

5 5. Troy Dickerson successfully convinced the Small Claims Court not to hear the \$100.00
6 matter because Solomon is an advocate for homeowners in HOAs.

7 6. Therefore, Plaintiff is now before the District Court were Troy Dickerson wants him.

8 7. Plaintiff respectfully requests the honorable Court to allow Solomon v. Palm Hills
9 Homeowners Association be heard in District Court.
10

11 **II**

12 **STATEMENT OF EVIDENCE PER JCRCP 74(c)**

13 8. As Plaintiff was denied a hearing in Small Claims Court he has never had the
14 opportunity to present evidence in the matter of Solomon v. Palm Hills Homeowners Association.

15 9. Given the opportunity to be heard in District Court Plaintiff will offer evidence proving
16 that he was not responsible for the \$100.00 that Defendant's forced him to pay.
17

18 **III**

19 **STATEMENT OF FACTS PER JCRCP 74(d)**

20 10. Solomon(Plaintiff) is a resident of Clark County, Nevada.

21 11. Palm Hills Homeowners Association ("Defendant" or "Association") is a Common-
22 Interest Community Homeowners Association ("HOA") doing business in Clark County, Nevada.

23 12. Solomon previously owned and resided in a home in Palm Hills Estates.

24 13. Solomon's property was located at 700 Leicester, Henderson, Nevada, 89002.

25 14. On February 10, 2013 Solomon filed a Small Claims Complaint ("Complaint") with the
26 Henderson Justice Court.
27

28 15. Complaint related to Defendant demanding and taking an illegal \$100.00 fine from

1
2 Solomon.

3 16. Court directed Solomon to file a Complaint with the Nevada Real Estate Division
4 (NRED) Ombudsman per NRS Chapter 38.300 to 38.360.

5 17. Solomon was informed that he first must go through Alternative Dispute Resolution
6 (ADR).

7 18. On April 9, 2013 Solomon filed an ADR Complaint.

8 19. One year after the original Complaint was filed, on January 14, 2014, ADR Arbitrator
9 William Turner awarded Troy Dickerson attorney's fees in the amount of \$7,348.17.
10

11 20. Records show that Troy Dickerson's fees were charged to both Solomon and Palm Hills
12 Homeowners Association.

13 21. Arbitrator directed Solomon to return to Court.

14 22. Ombudsman's office directed Solomon to Small Claims Court to litigate his \$100.00
15 illegal fine and vacate the \$7,348.17 award from William Turner to Troy Dickerson.
16

17 IV

18 SOLOMON MADE MULTIPLE DEMANDS THAT ARBITRATOR 19 WILLIAM TURNER RECUES HIMSELF

20 23. William Turner informed Solomon and Troy Dickerson that Solomon's tenant,
21 Attorney George Carter, was also his--William Turner's-- attorney.

22 24. Attorney George Carter was Solomon's attorney in the matter concerning the fines.

23 25. Attorney George Carter was the tenant in Solomon's Palm Hills Homeowners
24 Association property.
25

26 26. Both William Turner and Troy Dickerson were completely aware of the conflict of
27 interest regarding Attorney George Carter and the arbitration.
28

///

1
2 27. Troy Dickerson encouraged-**demand**- William Turner not recues himself, though
3 both knew of the conflict of interest in this matter.

4 28. Solomon believes Troy Dickerson and William Turner had Ex Parte communication,
5 operating collusively to create legal fees charged to Solomon and Palm Hills home owners in the
6 amount of \$7, 348.17 an amount 70 times greater than the \$100.00 original fine.

7 29. Solomon ask this court to vacate William Turner's \$7, 348.17 award to Troy
8 Dickerson.

9 30. Solomon requests this Court to sanction Troy Dickerson for misleading the Court in
10 this matter.
11

12 V

13 **CONCLUSION**

14 Solomon requests the right to be heard in District Court per Troy Dickerson demand that
15 Solomon be heard in District Court. Solomon requests the District Court vacate the \$7, 348.17
16 award to Troy Dickerson. It must be clear to this Court that this was done maliciously and
17 intentionally to inflict extreme harm on Solomon, Palm Hills home owners and the creditability of
18 the judicial system as a whole. Solomon requests this honorable Court to sanction Troy Dickerson
19 and William Turner for their reprehensible, despicable comportment in the Arbitration case of
20 Solomon v Palm Hills Homeowners Association.
21

22 DATED this 14th day of May, 2014
23

24 Solomon, Pro Se

25 By: 

26 Gary Solomon
27 1001 G St
28 [REDACTED]
[REDACTED]
[REDACTED] m

1
2 **CERTIFICATE OF MAILING**

3 Pursuant to NRCP 5(b), I certify that I, Gary Solomon, Pro se and that on the 15th day of
4 August 2013, I caused the document entitled **MOTION TO RECONSIDER** to be served as
5 follows:

6 [X] by delivering the document for mailing in the United States mail, in a sealed
7 envelope, upon which first class postage was prepaid, in Henderson, Nevada; and/or,

8 [] by delivering the document for mailing in the United States mail, in a sealed
9 envelope, certified, return receipt requested, upon which first class certified postage was prepaid,
10 in Henderson, Nevada; and/or,

11 [] pursuant to EDCR 7.26, to be sent via facsimile; and/or,


12 [] by sending the document via Electronic mail; and/or,

13 [] to be hand-delivered;

14 to the individuals and/or attorneys listed below at the address and/or facsimile number and/or
15 electronic mail address indicated below:

16 Troy Dickerson, Esq.
17 1120 N. Town Center Drive
18 # 260
Las Vegas, NV 8914

19 DATED this 14 day of May, 2014.

20
21
22 

Gary Solomon, Pro Se

100-443881-1011

Plaintiff,

**PALM HILLS HOME OWNERS
ASSOCIATION Inc.**

Defendant.

DEPT. NO.:

NOTICE OF APPEAL

TIME:

PLAINTIFF'S OPENING STATEMENT

1. To date, this matter before the District Court has never been heard.
2. Troy Dickerson with the Law Firm of Angius and Terry convinced the Small Claims Court that Plaintiff must go to District Court.
3. Troy Dickerson argued the Small Claims Court has no jurisdiction in this \$100.00

///

1
2 matter.

3 4. Plaintiff argued since the matter is \$100.00 he had the right, per NRS CHAPTER 73, to
4 be heard in Small Claims Court.

5 5. Troy Dickerson successfully convinced the Small Claims Court not to hear the \$100.00
6 matter because Solomon is an advocate for homeowners in HOAs.

7 6. Therefore, Plaintiff is now before the District Court were Troy Dickerson wants him.

8 7. Plaintiff respectfully requests the honorable Court to allow Solomon v. Palm Hills
9 Homeowners Association be heard in District Court.
10

11 **II**

12 **STATEMENT OF EVIDENCE PER JCRCP 74(c)**

13 8. As Plaintiff was denied a hearing in Small Claims Court he has never had the
14 opportunity to present evidence in the matter of Solomon v. Palm Hills Homeowners Association.

15 9. Given the opportunity to be heard in District Court Plaintiff will offer evidence proving
16 that he was not responsible for the \$100.00 that Defendant's forced him to pay.

17 **III**

18 **STATEMENT OF FACTS PER JCRCP 74(d)**

19 10. Solomon(Plaintiff) is a resident of Clark County, Nevada.
20

21 11. Palm Hills Homeowners Association ("Defendant" or "Association") is a Common-
22 Interest Community Homeowners Association ("HOA") doing business in Clark County, Nevada.

23 12. Solomon previously owned and resided in a home in Palm Hills Estates.

24 13. Solomon's property was located at 700 Leicester, Henderson, Nevada, 89002.

25 14. On February 10, 2013 Solomon filed a Small Claims Complaint ("Complaint") with the
26 Henderson Justice Court.

27 15. Complaint related to Defendant demanding and taking an illegal \$100.00 fine from
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2 Solomon.

3 16. Court directed Solomon to file a Complaint with the Nevada Real Estate Division
4 (NRED) Ombudsman per NRS Chapter 38.300 to 38.360.

5 17. Solomon was informed that he first must go through Alternative Dispute Resolution
6 (ADR).

7 18. On April 9, 2013 Solomon filed an ADR Complaint.

8 19. One year after the original Complaint was filed, on January 14, 2014, ADR Arbitrator
9 William Turner awarded Troy Dickerson attorney's fees in the amount of \$7,348.17.
10

11 20. Records show that Troy Dickerson's fees were charged to both Solomon and Palm Hills
12 Homeowners Association.

13 21. Arbitrator directed Solomon to return to Court.

14 22. Ombudsman's office directed Solomon to Small Claims Court to litigate his \$100.00
15 illegal fine and vacate the \$7,348.17 award from William Turner to Troy Dickerson.

16
17 **IV**

18 **SOLOMON MADE MULTIPLE DEMANDS THAT ARBITRATOR**
19 **WILLIAM TURNER RECUES HIMSELF**

20 23. William Turner informed Solomon and Troy Dickerson that Solomon's tenant,
21 Attorney George Carter, was also his--William Turner's-- attorney.

22 24. Attorney George Carter was Solomon's attorney in the matter concerning the fines.

23 25. Attorney George Carter was the tenant in Solomon's Palm Hills Homeowners
24 Association property.

25 26. Both William Turner and Troy Dickerson were completely aware of the conflict of
26 interest regarding Attorney George Carter and the arbitration.
27

28 ///

1
2 27. Troy Dickerson encouraged-**demande**- William Turner not recues himself, though
3 both knew of the conflict of interest in this matter.

4 28. Solomon believes Troy Dickerson and William Turner had Ex Parte communication,
5 operating collusively to create legal fees charged to Solomon and Palm Hills home owners in the
6 amount of \$7, 348.17 an amount 70 times greater than the \$100.00 original fine.

7 29. Solomon ask this court to vacate William Turner's \$7, 348.17 award to Troy
8 Dickerson.

9 30. Solomon requests this Court to sanction Troy Dickerson for misleading the Court in
10 this matter.
11

12 **V**

13 **CONCLUSION**

14 Solomon requests the right to be heard in District Court per Troy Dickerson demand that
15 Solomon be heard in District Court. Solomon requests the District Court vacate the \$7, 348.17
16 award to Troy Dickerson. It must be clear to this Court that this was done maliciously and
17 intentionally to inflict extreme harm on Solomon, Palm Hills home owners and the creditability of
18 the judicial system as a whole. Solomon requests this honorable Court to sanction Troy Dickerson
19 and William Turner for their reprehensible, despicable comportment in the Arbitration case of
20 Solomon v Palm Hills Homeowners Association.
21

22 DATED this 14th day of May, 2014

23 Solomon, Pro Se

24 By: 

25 Gary Solomon
26 
27
28

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2 **CERTIFICATE OF MAILING**

3 Pursuant to NRCP 5(b), I certify that I, Gary Solomon, Pro se and that on the 15th day of
4 August 2013, I caused the document entitled **MOTION TO RECONSIDER** to be served as
5 follows:

6 [X] by delivering the document for mailing in the United States mail, in a sealed
7 envelope, upon which first class postage was prepaid, in Henderson, Nevada; and/or,

8 [] by delivering the document for mailing in the United States mail, in a sealed
9 envelope, certified, return receipt requested, upon which first class certified postage was prepaid,
10 in Henderson, Nevada; and/or,

11 [] pursuant to EDCR 7.26, to be sent via facsimile; and/or,


12 [] by sending the document via Electronic mail; and/or,

13 [] to be hand-delivered;

14 to the individuals and/or attorneys listed below at the address and/or facsimile number and/or
15 electronic mail address indicated below:

16 Troy Dickerson, Esq.
17 1120 N. Town Center Drive
18 # 260
Las Vegas, NV 8914

19 DATED this 14 day of May, 2014.

20
21 
22 _____
Gary Solomon, Pro Se

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2 Gary Solomon
3
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7

8 JUSTICE COURT, LAS VEGAS TOWNSHIP
9 CLARK COUNTY, NEVADA

10 *

11 *

12 *

13 GARY SOLOMON)

14 Plaintiff,)

15 v.)

16 PALM HILLS HOME OWNERS)
17 ASSOCIATION Inc.)

18 Defendant.)
19)
20)

CASE NO.: 14-A000388

DEPT. NO.: RJC Courtroom 8A.

**OPPOSITION TO QUASH SUBPOENAS AND
PLAINTIFF'S MOTION TO COMPEL**

DATE: May 1, 2014

TIME: 1:00 PM

21 **OPPOSITION TO QUASH SUBPOENAS AND PLAINTIFF'S MOTION TO COMPEL**

22 Comes now, Solomon ("Solomon"), Pro se, and hereby files this **OPPOSITION TO QUASH**
23 **SUBPOENAS AND PLAINTIFF'S MOTION TO COMPEL**. This Motion is made and based
24

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2 upon the papers filed herein, and oral argument, if any, at the time of the hearing .

3 DATED this 28 day of April, 2014.

4 Solomon, Pro Se

5 By: _____

6 Gary Solomon

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2 **OPPOSITION TO QUASH SUBPOENAS AND PLAINTIFF'S MOTION TO COMPEL**

3 1. On April 22, 2014 Solomon served six (6) Subpoenas: Gail Anderson, Sharon Jackson,
4 Sonja Meriweather, Victoria Broadbent, Ken Richardson, and Jennifer Oerding (collectively "The
5 Subpoenaed").

6 2. Subpoenas directed individuals to testify at a hearing of this Court on the matter of
7 Solomon v. Palm Hills Homeowner's Association, Case Number 14-A000388 to be held on May
8 1, 2014 1:00 PM in our RJC Courtroom 8A.

9 3. On April 24, 2014 Senior Deputy Attorney General Michele. D. Briggs ("Briggs") filed
10 a Motion to Quash Subpoenas serving same on April 24, 2014.

11
12 **MEMORANDUM OF POINTS AND AUTHORITIES**

13 **I**

14 **STATEMENT OF FACTS**

15 4. Solomon is a resident of Clark County, Nevada.

16 5. Palm Hills Homeowners Association ("Defendant" or "Association") is a Common-
17 Interest Community Homeowners Association ("HOA") doing business in Clark County, Nevada.

18 6. Solomon previously owned and resided in a home in Palm Hills Estates.

19 7. Solomon's property was located at 700 Leicester, Henderson Nevada, 89002.

20 8. On February 10, 2013 Solomon filed a Small Claims Complaint ("Complaint"); **GARY**
21 **SOLOMON VS. PALM HILLS HOMEOWNERS ASSOCIATION--12AH000342.**

22 9. Complaint was related to Association demanding and taking an illegal \$100.00 fine
23 from Solomon regarding trash cans.

24 10. Court directed Solomon to file a Complaint with the Nevada Real Estate Division
25 (NRED) Ombudsman per NRS Chapter 38.300 to 38.360.

26
27 ///

1
2 11. Solomon was informed that he first must go through Alternative Dispute Resolution
3 (ADR).

4 12. On April 9, 2013 Solomon filed an ADR Complaint.

5 13. One year after the original Complaint was filed, on January 14, 2014, the ADR
6 Arbitrator William Turner awarded the Association's attorney, Troy Dickerson, attorney's fees in
7 the amount of \$7,348.17, legal fees in an amount over 70 times greater than the original \$100.00
8 claim that had been denied by William Turner, Arbitrator.

9 14. Arbitrator directed Solomon to return to Court.
10

11 15. Once the matter has been taken before the Ombudsman's Office-ADR-Solomon had the
12 right to move into the Nevada State Court system.

13 16. Ombudsman's office directed Solomon back to Small Claims Court.

14 17. Solomon has the right to return to Small Claims Court after the completion of the ADR
15 process.

16 18. Solomon met the requirements dictated by NRS 116 and Henderson Justice Court .
17

18 19. Association's counsel, Troy Dickerson, Angius and Terry Law Offices, intentionally
19 and collusively inflated and created legal fees in the amount of \$7,348.17 on a matter of \$100, an
20 amount over 70 times greater than the \$100.00 claim.

21 20. Legal fees were charged to Solomon by the order of William Turner, Arbitrator.

22 II

23 **SOLOMON MADE MULTIPLE DEMANDS ON WILLIAM TURNER TO RECUES** 24 **HIMSELF IN NON-BINDING ARBITRATION AND THEREFORE REQUESTS THIS** 25 **COURT VACATE TROY DICKERSON'S \$7,348.17 LEGAL AWARD**

26 21. Solomon demanded William Turner, Arbitrator, recues himself.

27 22. William Turner informed Solomon that Solomon's tenant, Attorney George Carter,
28

1
2 was, in fact, his attorney in his-William Turner's-personal legal case.

3 23. Attorney George Carter was Solomon's attorney in the matter concerning the fines.

4 24. Attorney George Carter was the tenant in Solomon's Palm Hills property.

5 25. **Both William Turner and Troy Dickerson were completely aware of the conflict**
6 **of interest regarding Attorney George Carter and this arbitration.**

7 26. Troy Dickerson encouraged-demanded-that William Turner not recues himself though
8 **both knew of the conflict of interest.**

9 27. Solomon believes Troy Dickerson and William Turner had Ex Parte communication,
10 operating collusively to create legal fees charged to Solomon in the amount of \$7, 348.17 on a
11 \$100 claim which is 70 times greater than the \$100.00 claim.
12

13 28. It must be clear to this Court that this was done maliciously and intentionally to inflict
14 harm on not only Solomon, but the creditability of the judicial system as a whole.

15 29. Solomon followed through with the directive of the Ombudsman's office.

16 30. Solomon has the right to move forward with his Complaint in Small Claims Court per
17 the Ombudsman's office.
18

19 31. Solomon requests this Court sanction Troy Dickerson for misleading the Court in this
20 matter.

21 32. Solomon requests this Court vacate Arbitrator William Turner's award of \$7, 348.17 to
22 Troy Dickerson on a \$100 claim which is 70 times greater than the original \$100.00 claim.
23

24 III

25 SOLOMON'S BAR COMPLAINT AGAINST WILLIAM TURNER AND 26 TROY DICKERSON

27 ADR Commissioner
28 Eighth Judicial District Court
Phoenix Building
330 S. Third St., #1060

1 Las Vegas, NV 89155-2377
2 1-702-671-4493
3 1-702-671-4484

4 Phillip J. Patte
5 State Bar of Nevada
6 600 East Charleston Blvd.
7 Las Vegas, NV 89104-1563
8 1-702-383-2200
9 1-702-385-2878

10 George Carter, Attorney at Law
11 1050 E. Sahara Ave.
12 Las Vegas, NV 89104
13 1-702-384 8951

14 Christopher J. Lalli
15 Assistant District Attorney
16 Office of the District Attorney
17 200 Lewis Avenue
18 Las Vegas, NV 89101
19 1-(702)- 671-2501
20 1-(702)-455-2294

21 State of Nevada
22 Department of Business and Industry
23 Real Estate Division
24 2501 E Sahara Ave., Ste. 102,
25 Las Vegas Nevada 89104-4137
26 1-(702)-486-4033
27 1-(702)-486-4275

28 Lisa McGrane,
Fee Dispute Manager
State Bar of Nevada
Las Vegas Office
600 E. Charleston Blvd., Las Vegas, NV 89104
1-(702)-382-2200
1- (702)-385-2878

33. William Turner was the Arbitrator on my \$100.00 return of fines claim charged against me by Palm Hills Homeowners Association (the "HOA") on my property at 700 Leicester, Henderson, Nevada 89002 ("Property").

34. Troy Dickerson, Law firm of Anguis and Terry, represented the HOA.

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35. I, Gary Solomon, filed a complaint through NRED against my HOA.

36. William Turner was assigned as the Arbitrator for the case, Solomon v. HOA.

37. During arbitration William Turner disclosed that Attorney George Carter was his, William Turner's, attorney.

38. George Carter was my attorney.

39. George Carter was my tenant at the Property on which the fine was levied.

40. During the one and only phone call/contact with me William Turner asked Troy Dickerson and myself if he should recues himself as the Arbitrator due to a conflict of interest. (I have a witness to this conversation.)

41. Troy Dickerson stated that he felt there was not a conflict of interest.

42. I stated that there was a conflict of interest and demanded that William Turner recues himself. (I have a witness to this conversation.)

43. I demanded that William Turner turn the matter back over to the Ombudsman's office to be heard through the new \$250.00 Mediation Program.

44. William Turner refused to recues himself and refused to turn the matter over to the Ombudsman's office for the new \$250.00 Mediation Program.

45. Troy Dickerson demanded that William Turner remain as the Arbitrator.

46. I refused to continue with the Arbitration.

47. William Turner and Troy Dickerson continued the Arbitration without me.

48. William Turner awarded Troy Dickerson \$7,348.17, an amount over 70 times greater than the amount of my \$100.00 claim; \$7, 098.17 more than the new \$250.00 Nevada State mediation program would have cost me in total.

49. William Turner waved his Arbitrator's fees.

1
2 50. Now why in the world would William Turner wave his Arbitrator's fees? Was it
3 because there was a conflict of interest?

4 51. NECESSARY ACTION

- 5
 - Suspend/disbar William Turner, Attorney at Law
 - 6 • Suspend/disbar Troy Dickerson, Attorney at Law
 - 7 • Remove William Turner as an Arbitrator

8 IV

9 **OMBUDSMAN FOR OWNERS IN A COMMON INTEREST COMMUNITY:**
10 **APPEARANCE UNDER SUBPOENA OF GAIL ANDERSON, SHARON JACKSON,**
11 **SONJA MERIWEATHER, VICTORIA BROADBENT, KEN RICHARDSON, AND**
12 **JENNIFER OERDING IS IMPORTANT IN THE CASE**

13 52. Duties and Responsibilities of the Office of the Ombudsman for home owners in a
14 common interest community are , in part, to assist home owners in processing claims submitted to
15 mediation or arbitration pursuant to NRS 38.300 to 38.360, inclusive; Assist owners in common-
16 interest communities to understand their rights and responsibilities as set forth in Chapter 116B of
17 NRS and the governing documents of their associations, including, without limitation, publishing
18 materials related to those rights and responsibilities;

19 53. Briggs reports her following concerns:

- 20 A. *"Individuals being subpoenaed are employees of the Nevada Real Estate Division".*
21
22 B. *"None of the individuals being subpoenaed have any personal knowledge about the*
23 *subject matter of the claim".*
24
25 C. *"Having six employees from NRED attend the hearing on this matter is unduly*
26 *burdensome on NRED".*
27
28 D. *"It is not clear what information The Subpoenaed have that would be relevant to*
this matter."
C. *"But to the extent any requested information concerns an investigation by NRED*

1 *such information is confidential by NRS 116.757".*

2
3 *D. "Compelling their testimony may potentially required the disclosure of confidential*
4 *matters that are related or be on the scope of litigation and no exception or waiver*
5 *applies".*

6 *E. "The Subpoenaed comprise a large part of the entire workforce for the*
7 *ombudsman's office. Requiring them to attend the hearing is unduly burdensome to*
8 *them".*

9 *F. "NRED has not received adequate time to prepare to have such a large part of his*
10 *staff absence".*

11 *G. "The subpoenas also failed to comply with JCRCP 45(a)(1)(D) in that they failed to*
12 *include the text of subdivision (c) and (d) of JCRCP 45".*

13 **V**

14 **THE SUBPOENAED HAVE KNOWLEDGE NECESSARY FOR THE COURT TO**
15 **HEAR AND MAKE A RESPONSIBLE AND PROPER RULINGS IN SOLOMON'S**
16 **SMALL CLAIMS CASE AND THE VACATING OF TROY DICKERSON'S \$7,348.17**
17 **LEGAL AWARD MADE BY ARBITRATOR WILLIAM TURNER**

18 54. Solomon believes the Court is being bamboozled by Troy Dickerson's specious and
19 spurious arguments.

20 55. It is necessary for the Court to allow Solomon's subpoena's to stand as NRED
21 employee's are trained in clarifying to the Court his rights to appear in Small Claims Court.

22 56. The Subpoenaed, as employees of an NRED, have direct knowledge of the inner
23 workings of NRS 116.

24 57. To Solomon's knowledge none of the Subpoenaed have direct knowledge of this case.

25 58. The Subpoenaed are aware of the rules and guidelines that allow homeowners who
26 have been through arbitration to enter into the Small Claim's Civil Court system.

27 59. It is imperative that none of the individuals being subpoenaed have any direct
28 knowledge concerning this case to avoid any conflict of interest.

1
2 60. The six subpoenaed employees are important in Solomon's case as they are involved in
3 NRED's day-to-day Ombudsman for owners in common interest communities operations.

4 61. Since no confidential information will be released by the Subpoenaed or asked of the
5 Subpoenaed no conflict exists.

6 62. Solomon only needs The Subpoenaed to clarify NRS 116, mediation and ADR and his
7 right to access the courts per NRS 116.

8 **CONCLUSION**

9
10 Solomon requests the right to be heard in this matter in Small Claims Court. It is
11 unreasonable that the matter of Solomon v. HOA has taken over a year and a half to return to
12 Small Claims Court. And, it is necessary that The Subpoenaed appear in this Court to clarify to the
13 Court NREDs rules and regulations. As Troy Dickerson continues to horns woggle the Court,
14 Solomon requests the Court sanction Troy Dickerson. Solomon has filed a bar complaint against
15 Troy Dickerson, Anguis and Terry Law Offices, and William Turner, for their reprehensible,
16 despicable comportment in the Arbitration case of Solomon v. HOA. As the Arbitration was
17 nonbinding Solomon requests the vacating of the \$7,348.17 awarded to Troy Dickerson, an
18 amount over 70 times greater than the original \$100.00 claim. Solomon asks the Court to sanction
19 both Troy Dickerson and William Turner.
20

21 DATED this 28th day of April, 2014

22
23 Solomon, Pro Se

24 By: _____

Gary Solomon

1881 G Street, N.E.

Atlanta, Georgia 30316

Phone: (404) 525-1234

Fax: (404) 525-1234

E-mail: gary@solomonprose.com

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1 **CERTIFICATE OF MAILING**

2 Pursuant to NRCP 5(b), I certify that I, Gary Solomon, Pro se and that on the 28th day of
3 April, 2014, I caused the document entitled **OPPOSITION TO QUASH SUBPOENAS AND**
4 **PLAINTIFF'S MOTION TO COMPEL** to be served as follows:
5

6 ☒ [X] by delivering the document for mailing in the United States mail, in a sealed
7 envelope, upon which first class postage was prepaid, in Henderson, Nevada; and/or,

8 ☐ [] by delivering the document for mailing in the United States mail, in a sealed
9 envelope, certified, return receipt requested, upon which first class certified postage was prepaid,
10 in Henderson, Nevada; and/or,

11 ☐ [] pursuant to EDCR 7.26, to be sent via facsimile; and/or,

12 ☐ [] by sending the document via Electronic mail; and/or,


13 ☐ [] to be hand-delivered;

14 to the individuals and/or attorneys listed below at the address and/or facsimile number and/or
15 electronic mail address indicated below:

16 Michelle Briggs
17 Senior Deputy Attorney General
18 State of Nevada
19 Department of Business and Industry
20 Real Estate Division
21 2101 E. Sahara Ave
22 Suite 102
23 Las Vegas, Nevada 89104-4137

24 Troy Dickerson
25 1120 N. Town Center Drive
26 # 260
27 Las Vegas, NV 89144

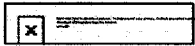
28 DATED this 15 day of August, 2013.



Gary Solomon, Pro Se

Gary Solomon

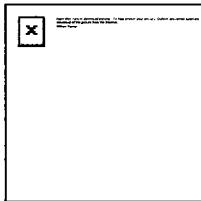
From: William Turner [invitations-noreply@linkedin.com]
Sent: Monday, November 24, 2014 10:29 PM
To: Gary Solomon, Ph.D.
Subject: William Turner's invitation is waiting for your response



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How would you like to respond?

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William Turner

William C. Turner, Esq. Mediation and Dispute Resolution

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This email was intended for Gary Solomon, Ph.D. (Professor of Psychology at College of Southern Nevada). [Learn why we included this.](#)

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