

ORIGINAL

1 COM
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5 LAS VEGAS CITY EMPLOYEES' ASSOCIATION PAC
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FILED
DEC 17 2009
Clerk of Court
CLERK OF COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

8 LAS VEGAS CITY EMPLOYEES
9 ASSOCIATION, a corporation; and
10 LAS VEGAS CITY EMPLOYEES'
11 ASSOCIATION PAC; a corporation

Plaintiffs,

vs.

12 KAREN HURTADO, an individual;
13 JOSEPH COOK, an individual; and
14 DOES 1 through 10 inclusive,

Defendants.

CASE NO. A-09-606113-C

DEPT NO. XVI

JURY TRIAL DEMANDED

ARBITRATION EXEMPTION CLAIMED:
amount in issue in excess of \$50,000.00

COMPLAINT

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18 COME NOW, Plaintiffs, LAS VEGAS CITY EMPLOYEES ASSOCIATION and LAS
19 VEGAS CITY EMPLOYEES' ASSOCIATION PAC, by and through counsel, Bruce K. Snyder,
20 Esq., General Counsel of the Las Vegas City Employees Association and Las Vegas City Employees'
21 Association PAC, and hereby files their Complaint against the Defendants as follows:
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PARTIES

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25 1. That at all times relevant herein, the Las Vegas City Employees Association (hereinafter
26 referred to as "LVCEA") was and is a corporation whose sole office is in Las Vegas,
27 Nevada and which conducts business in the County of Clark, State of Nevada;
28 2. That at all times relevant herein, the Las Vegas City Employees' Association PAC

- 1 (hereinafter referred to as "LVCEA PAC") was and is a corporation whose sole office is
2 in Las Vegas, Nevada and which conducts business in the County of Clark, State of
3 Nevada;
- 4 3. That LVCEA and LVCEA PAC are hereinafter collectively referred to as the
5 PLAINTIFFS;
- 6 4. That the LVCEA is an employee organization that represents certain employees who
7 work for the City of Las Vegas;
- 8 5. That at all times relevant herein, Karen Hurtado (formerly known as Karen Frei and
9 hereinafter referred to as "HURTADO") was and is a resident of the County of Clark,
10 State of Nevada;
- 11 6. That at all times relevant herein, HURTADO was the General Manager of the LVCEA
12 until the LVCEA terminated her on May 11, 2009;
- 13 7. That at all times relevant herein, JOSEPH COOK (hereinafter referred to as "COOK")
14 was a resident of the County of Clark, State of Nevada;
- 15 8. The true names and capacities, whether individual, corporate, associate or otherwise of
16 the Defendants named herein as DOES 1 through 10, are Defendants presently unknown
17 to the LVCEA, who, therefore, sues said Defendants by such fictitious names, and the
18 LVCEA will ask leave to amend this Complaint to show their true names and capacities
19 when the same have been ascertained. The LVCEA believes that said Defendants are
20 individuals or entities within the jurisdiction of this Court who may be responsible for
21 monies due and owing to the LVCEA, interfering with payments due the LVCEA, or are
22 negligent or responsible in some manner for the events herein referred to, and caused
23 damages proximately thereby to the LVCEA as alleged herein;
- 24 9. That HURTADO, COOK, and DOES 1 through 10 are hereinafter collectively referred to
25 as the DEFENDANTS;
- 26 ...
27 ...
28 ...

- 1 LVCEA President and LVCEA Treasurer for their review and signatures;
- 2 20. That it was the practice of the LVCEA to keep two blank and previously signed checks in
3 case of an emergency;
- 4 21. That upon information and belief HURTADO regularly used the blank and previously
5 signed checks to circumvent the review by the LVCEA President and LVCEA Treasurer;
- 6 22. That on or about December 29, 2006 HURTADO made a purchase with the VISA Card at
7 Target in the amount of \$225.17, and that upon information and belief said purchase was
8 not made for LVCEA business purposes;
- 9 23. That on or about December 30, 2006 HURTADO made a purchase with the VISA Card at
10 a Vons Store in the amount of \$100.00, and that upon information and belief said
11 purchase was not made for LVCEA business purposes;
- 12 24. That on or about December 30, 2006 HURTADO made a purchase with the VISA Card at
13 a Vons Store in the amount of \$81.48, and that upon information and belief said purchase
14 was not made for LVCEA business purposes;
- 15 25. That on or about January 20, 2007 HURTADO made a purchase with the VISA Card at a
16 Vons Store in the amount of \$120.00, and that upon information and belief said purchase
17 was not made for LVCEA business purposes;
- 18 26. That on or about January 20, 2007 HURTADO made a purchase with the VISA Card at a
19 Wal-Mart Supercenter in the amount of \$265.37, and that upon information and belief
20 said purchase was not made for LVCEA business purposes;
- 21 27. That on or about January 20, 2007 HURTADO made a purchase with the VISA Card at
22 Sony Style Direct in the amount of \$299.99, and that upon information and belief said
23 purchase was not made for LVCEA business purposes;
- 24 28. That on or about January 20, 2007 HURTADO made a purchase with the VISA Card at
25 Wal-Mart in the amount of \$236.06, and that upon information and belief said purchase
26 was not made for LVCEA business purposes;
- 27 29. That on or about January 29, 2007 HURTADO made a purchase with the VISA Card at
28 The Home Depot in the amount of \$298.03, and that upon information and belief said

- 1 purchase was not made for LVCEA business purposes;
- 2 30. That on or about January 31, 2007 HURTADO made a purchase with the VISA Card
3 from JCPenney Catalog in the amount of \$1,584.14, and that upon information and belief
4 said purchase was not made for LVCEA business purposes;
- 5 31. That on or about February 7, 2007 HURTADO made a purchase with the VISA Card at
6 the Las Vegas 51's in the amount of \$515.00, and that upon information and belief said
7 purchase was not made for LVCEA business purposes;
- 8 32. That on or about February 7, 2007 HURTADO made a purchase with the VISA Card
9 from 1(800)4Champagne, Etc. in the amount of \$84.60, and that upon information and
10 belief said purchase was not made for LVCEA business purposes;
- 11 33. That on or about February 12, 2007 HURTADO made a purchase with the VISA Card at
12 the Las Vegas Wranglers in the amount of \$1,598.10, and that upon information and
13 belief said purchase was not made for LVCEA business purposes;
- 14 34. That on or about February 13, 2007 HURTADO made a purchase with the VISA Card at
15 Applebee's in the amount of \$49.12, and that upon information and belief said purchase
16 was not made for LVCEA business purposes;
- 17 35. That on or about February 14, 2007 HURTADO made a purchase with the VISA Card
18 from Amazon.com in the amount of \$21.69, and that upon information and belief said
19 purchase was not made for LVCEA business purposes;
- 20 36. That on or about February 15, 2007 HURTADO made a purchase with the VISA Card
21 from Godiva Chocolatier in the amount of \$35.73, and that upon information and belief
22 said purchase was not made for LVCEA business purposes;
- 23 37. That on or about February 16, 2007 HURTADO made a purchase with the VISA Card at
24 Applebee's in the amount of \$275.00, and that upon information and belief said purchase
25 was not made for LVCEA business purposes;
- 26 38. That on or about February 24, 2007 HURTADO made a purchase with the VISA Card at
27 Best Buy in the amount of \$177.94, and that upon information and belief said purchase
28 was not made for LVCEA business purposes;

- 1 39. That on or about February 24, 2007 HURTADO made a purchase with the VISA Card at
2 The Home Depot in the amount of \$43.09, and that upon information and belief said
3 purchase was not made for LVCEA business purposes;
- 4 40. That on or about March 8, 2007 HURTADO made a purchase with the VISA Card at a
5 Vons Store in the amount of \$215.00, and that upon information and belief said purchase
6 was not made for LVCEA business purposes;
- 7 41. That on or about March 20, 2007 HURTADO made a purchase with the VISA Card at
8 We Play Sports in the amount of \$99.80, and that upon information and belief said
9 purchase was not made for LVCEA business purposes;
- 10 42. That on or about March 22, 2007 HURTADO made a purchase with the VISA Card at In-
11 N-Out Burger in the amount of \$18.59, and that upon information and belief said
12 purchase was not made for LVCEA business purposes;
- 13 43. That on or about March 24, 2007 HURTADO made a purchase with the VISA Card at
14 The Olive Garden in the amount of \$219.45, and that upon information and belief said
15 purchase was not made for LVCEA business purposes;
- 16 44. That on or about March 24, 2007 HURTADO made a purchase with the VISA Card at
17 The Olive Garden in the amount of \$100.95, and that upon information and belief said
18 purchase was not made for LVCEA business purposes;
- 19 45. That on or about March 25, 2007 HURTADO made a purchase with the VISA Card at
20 McDonald's in the amount of \$36.18, and that upon information and belief said purchase
21 was not made for LVCEA business purposes;
- 22 46. That on or about April 5, 2007 HURTADO made a purchase with the VISA Card at a
23 Vons Store in the amount of \$130.00, and that upon information and belief said purchase
24 was not made for LVCEA business purposes;
- 25 47. That on or about April 6, 2007 HURTADO made a purchase with the VISA Card at a
26 Vons Store in the amount of \$65.00, and that upon information and belief said purchase
27 was not made for LVCEA business purposes;
- 28 48. That on or about April 15, 2007 HURTADO made a purchase with the VISA Card at a

- 1 Vons Store in the amount of \$65.00, and that upon information and belief said purchase
2 was not made for LVCEA business purposes;
- 3 49. That on or about April 26, 2007 HURTADO made a purchase with the VISA Card at the
4 Las Vegas Wranglers in the amount of \$40.00, and that upon information and belief said
5 purchase was not made for LVCEA business purposes;
- 6 50. That on or about April 30, 2007 HURTADO made a purchase with the VISA Card at In-
7 N-Out Burger in the amount of \$14.23, and that upon information and belief said
8 purchase was not made for LVCEA business purposes;
- 9 51. That on or about May 5, 2007 HURTADO made a purchase with the VISA Card at
10 Enterprise Rent-A-Car in the amount of \$211.55, and that upon information and belief
11 said purchase was not made for LVCEA business purposes;
- 12 52. That on or about May 7, 2007 HURTADO made a purchase with the VISA Card at a
13 Vons Store in the amount of \$155.00, and that upon information and belief said purchase
14 was not made for LVCEA business purposes;
- 15 53. That on or about May 9, 2007 HURTADO made a purchase with the VISA Card at the
16 Las Vegas 51's in the amount of \$744.00, and that upon information and belief said
17 purchase was not made for LVCEA business purposes;
- 18 54. That on or about May 13, 2007 HURTADO made a purchase with the VISA Card at Best
19 Buy in the amount of \$535.56, and that upon information and belief said purchase was
20 not made for LVCEA business purposes;
- 21 55. That on or about May 18, 2007 HURTADO made a purchase with the VISA Card at
22 Hudson News in the amount of \$49.34, and that upon information and belief said
23 purchase was not made for LVCEA business purposes;
- 24 56. That on or about May 21, 2007 HURTADO made a purchase with the VISA Card at Best
25 Buy in the amount of \$269.36, and that upon information and belief said purchase was
26 not made for LVCEA business purposes;
- 27 57. That on or about May 21, 2007 HURTADO made a purchase with the VISA Card at In-
28 N-Out Burger in the amount of \$21.47, and that upon information and belief said

- 1 purchase was not made for LVCEA business purposes;
- 2 58. That on or about May 21, 2007 HURTADO made a purchase with the VISA Card at Wal-
- 3 Mart in the amount of \$16.60, and that upon information and belief said purchase was not
- 4 made for LVCEA business purposes;
- 5 59. That on or about May 23, 2007 HURTADO made a purchase with the VISA Card at Wal-
- 6 Mart in the amount of \$50.02, and that upon information and belief said purchase was not
- 7 made for LVCEA business purposes;
- 8 60. That on or about June 4, 2007 HURTADO made a purchase with the VISA Card at
- 9 Target in the amount of \$223.13, and that upon information and belief said purchase was
- 10 not made for LVCEA business purposes;
- 11 61. That on or about June 7, 2007 HURTADO made a purchase with the VISA Card at
- 12 Chili's Grill in the amount of \$36.00, and that upon information and belief said purchase
- 13 was not made for LVCEA business purposes;
- 14 62. That on or about June 13, 2007 HURTADO made a purchase with the VISA Card at
- 15 Chili's Grill in the amount of \$275.00, and that upon information and belief said purchase
- 16 was not made for LVCEA business purposes;
- 17 63. That on or about June 19, 2007 HURTADO made a purchase with the VISA Card at
- 18 Richard Petty Driving Experience in the amount of \$312.72, and that upon information
- 19 and belief said purchase was not made for LVCEA business purposes;
- 20 64. That on or about June 19, 2007 HURTADO made a purchase with the VISA Card from
- 21 Sears.com in the amount of \$312.56, and that upon information and belief said purchase
- 22 was not made for LVCEA business purposes;
- 23 65. That on or about June 20, 2007 HURTADO made a purchase with the VISA Card at
- 24 Target in the amount of \$63.24, and that upon information and belief said purchase was
- 25 not made for LVCEA business purposes;
- 26 66. That on or about June 20, 2007 HURTADO made a purchase with the VISA Card at
- 27 Applebee's in the amount of \$39.86, and that upon information and belief said purchase
- 28 was not made for LVCEA business purposes;

- 1 67. That on or about June 20, 2007 HURTADO made a purchase with the VISA Card at a
2 Vons Store in the amount of \$20.00, and that upon information and belief said purchase
3 was not made for LVCEA business purposes;
- 4 68. That on or about June 21, 2007 HURTADO made a purchase with the VISA Card from
5 Alaska Air in the amount \$408.80, and that upon information and belief said purchase
6 was not made for LVCEA business purposes;
- 7 69. That on or about June 21, 2007 HURTADO made a purchase with the VISA Card from
8 Radioshack.com in the amount of \$275.42, and that upon information and belief said
9 purchase was not made for LVCEA business purposes;
- 10 70. That on or about June 21, 2007 HURTADO made a purchase with the VISA Card at the
11 Las Vegas 51's in the amount of \$404.00, and that upon information and belief said
12 purchase was not made for LVCEA business purposes;
- 13 71. That on or about June 22, 2007 HURTADO made a purchase with the VISA Card at the
14 Las Vegas Wranglers in the amount of \$799.05, and that upon information and belief said
15 purchase was not made for LVCEA business purposes;
- 16 72. That on or about June 22, 2007 HURTADO made a purchase with the VISA Card at Jack
17 in the Box in the amount of \$26.44, and that upon information and belief said purchase
18 was not made for LVCEA business purposes;
- 19 73. That on or about June 22, 2007 HURTADO made a purchase with the VISA Card at a
20 Vons Store in the amount of \$166.99, and that upon information and belief said purchase
21 was not made for LVCEA business purposes;
- 22 74. That on or about June 22, 2007 HURTADO made a purchase with the VISA Card from
23 Radioshack.com in the amount of \$272.04, and that upon information and belief said
24 purchase was not made for LVCEA business purposes;
- 25 75. That on or about June 22, 2007 HURTADO's VISA Card was charged service fees from
26 Expedia in the amount of \$5.00, and that upon information and belief said charge related
27 to a prior purchase that was not made for LVCEA business purposes;
- 28 76. That on or about June 23, 2007 HURTADO made a purchase with the VISA Card at Jack

- 1 in the Box in the amount of \$18.69, and that upon information and belief said purchase
2 was not made for LVCEA business purposes;
- 3 77. That on or about June 24, 2007 HURTADO made a purchase with the VISA Card at
4 Target in the amount of \$330.76, and that upon information and belief said purchase was
5 not made for LVCEA business purposes;
- 6 78. That on or about June 24, 2007 HURTADO made a purchase with the VISA Card at Ross
7 Stores in the amount of \$111.96, and that upon information and belief said purchase was
8 not made for LVCEA business purposes;
- 9 79. That on or about July 14, 2007 HURTADO made a purchase with the VISA Card at
10 Southwest Airlines in the amount of \$258.30, and that upon information and belief said
11 purchase was not made for LVCEA business purposes;
- 12 80. That on or about July 14, 2007 HURTADO made a purchase with the VISA Card at
13 Southwest Airlines in the amount of \$258.30, and that upon information and belief said
14 purchase was not made for LVCEA business purposes;
- 15 81. That on or about July 17, 2007 HURTADO made a purchase with the VISA Card at
16 Frontier Airlines in the amount of \$215.50, and that upon information and belief said
17 purchase was not made for LVCEA business purposes;
- 18 82. That on or about July 17, 2007 HURTADO made a purchase with the VISA Card at
19 Frontier Airlines in the amount of \$215.50, and that upon information and belief said
20 purchase was not made for LVCEA business purposes;
- 21 83. That on or about July 18, 2007 HURTADO made a purchase with the VISA Card at a
22 Vons Store in the amount of \$176.99, and that upon information and belief said purchase
23 was not made for LVCEA business purposes;
- 24 84. That on or about July 18, 2007 HURTADO made a purchase with the VISA Card at Best
25 Buy in the amount of \$366.24, and that upon information and belief said purchase was
26 not made for LVCEA business purposes;
- 27 85. That on or about July 18, 2007 HURTADO's VISA Card was charged service fees from
28 Expedia in the amount of \$10.00, and that upon information and belief said charge related

- 1 to a prior purchase that was not made for LVCEA business purposes;
- 2 86. That on or about July 19, 2007 HURTADO made a purchase with the VISA Card at Wal-
- 3 Mart in the amount of \$408.14, and that upon information and belief said purchase was
- 4 not made for LVCEA business purposes;
- 5 87. That on or about July 23, 2007 HURTADO made a purchase with the VISA Card at the
- 6 West Charleston Bookstore in the amount of \$159.89, and that upon information and
- 7 belief said purchase was not made for LVCEA business purposes;
- 8 88. That on or about July 23, 2007 HURTADO made a purchase with the VISA Card at US
- 9 Airways in the amount of \$239.80, and that upon information and belief said purchase
- 10 was not made for LVCEA business purposes;
- 11 89. That on or about July 30, 2007 HURTADO made a purchase with the VISA Card from
- 12 Cambridge Who's Who in the amount of \$1,117.95, and that upon information and belief
- 13 said purchase was not made for LVCEA business purposes;
- 14 90. That on or about August 6, 2007 HURTADO made a purchase with the VISA Card at
- 15 Best Buy in the amount of \$240.55, and that upon information and belief said purchase
- 16 was not made for LVCEA business purposes;
- 17 91. That on or about August 6, 2007 HURTADO made a purchase with the VISA Card at
- 18 New York Party Shuttle in the amount of \$300.00, and that upon information and belief
- 19 said purchase was not made for LVCEA business purposes;
- 20 92. That on or about August 6, 2007 HURTADO made a purchase with the VISA Card at
- 21 Tele-Charge Ticketing in the amount of \$148.50, and that upon information and belief
- 22 said purchase was not made for LVCEA business purposes;
- 23 93. That on or about August 6, 2007 HURTADO made a purchase with the VISA Card at
- 24 Tele-Charge Ticketing in the amount of \$148.50, and that upon information and belief
- 25 said purchase was not made for LVCEA business purposes;
- 26 94. That on or about August 7, 2007 HURTADO made a purchase with the VISA Card at a
- 27 Vons Store in the amount of \$100.00, and that upon information and belief said purchase
- 28 was not made for LVCEA business purposes;

- 1 95. That on or about August 7, 2007 HURTADO made a purchase with the VISA Card at
2 The Olive Garden in the amount of \$70.40, and that upon information and belief said
3 purchase was not made for LVCEA business purposes;
- 4 96. That on or about August 7, 2007 HURTADO made a purchase with the VISA Card at
5 StubHub, Inc. in the amount of \$119.75, and that upon information and belief said
6 purchase was not made for LVCEA business purposes;
- 7 97. That on or about August 7, 2007 HURTADO made a purchase with the VISA Card at
8 Wireless Toyz in the amount of \$40.93, and that upon information and belief said
9 purchase was not made for LVCEA business purposes;
- 10 98. That on or about August 10, 2007 HURTADO made a purchase with the VISA Card at
11 Aramark in the amount of \$399.00, and that upon information and belief said purchase
12 was not made for LVCEA business purposes;
- 13 99. That on or about August 13, 2007 HURTADO made a purchase with the VISA Card at a
14 Wal-Mart Supercenter in the amount of \$209.18, and that upon information and belief
15 said purchase was not made for LVCEA business purposes;
- 16 100. That on or about August 13, 2007 HURTADO made a purchase with the VISA Card at
17 Holiday Inns in the amount of \$406.68, and that upon information and belief said
18 purchase was not made for LVCEA business purposes;
- 19 101. That on or about August 14, 2007 HURTADO made a purchase with the VISA Card at
20 The Olive Garden in the amount of \$54.36, and that upon information and belief said
21 purchase was not made for LVCEA business purposes;
- 22 102. That on or about August 15, 2007 HURTADO made a purchase with the VISA Card at
23 Wal-Mart in the amount of \$46.64, and that upon information and belief said purchase
24 was not made for LVCEA business purposes;
- 25 103. That on or about August 15, 2007 HURTADO made a purchase with the VISA Card at
26 the West Charleston Bookstore in the amount of \$75.97, and that upon information and
27 belief said purchase was made not for LVCEA business purposes;
- 28 104. That on or about August 15, 2007 HURTADO made a purchase with the VISA Card at