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22 CLARK COUNTY NEVADA  
23 DISTRICT COURT

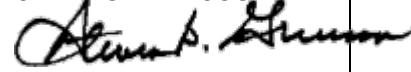
24 MARIAH MAAS, as Special Administrator  
25 for the Estate of Tiffany Slatsky, MARTIN  
26 SLATSKY, as parent and legal guardian of  
27 CADE SLATSKY, a minor,

28 Plaintiffs,

v.

22 CHRISTOPHER CANDITO, an individual,  
23 ANDREW CLAPPER, an individual,  
24 NICHOLAS ROBISON, an individual,  
25 ANDREW STOCKER, an individual,  
26 STEVEN HONSOWETZ, an individual,  
27 CITY OF NORTH LAS VEGAS, a  
28 municipality; NORTH LAS VEGAS FIRE  
DEPARTMENT, a City of North Las Vegas  
agency; GNLV, LLC *dba* GOLDEN  
NUGGET HOTEL & CASINO, a Domestic  
Limited-Liability Company; DOMAIN  
PROPERTY OWNER LLC; a Foreign  
Limited-Liability Company; OAKTREE

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Case No.: A-22-847914-C  
Dept. No.: 1

COMPLAINT AND DEMAND FOR  
JURY TRIAL

1 CAPITAL MANAGEMENT L.P.; a  
2 Foreign Limited Partnership; DOE  
3 DEFENDANTS I through XX, and ROE  
4 CORPORATIONS I through X, inclusive,

5 Defendants.

6 Plaintiffs allege the following against Defendants:

7 **INTRODUCTION**

8 1. This action seeks compensatory and punitive damages from Defendants for  
9 violation of various rights under the United States Constitution and state law in connection with  
the death of Tiffany Slatsky (“Decedent”).

10 **PARTIES**

11 2. At all relevant times, Tiffany Slatsky (“Decedent”) was a resident of Clark County  
12 in the State of Nevada.

13 3. Plaintiff CADE SLATSKY is Decedent’s heir.

14 4. At all relevant times, Plaintiff CADE SLATSKY was and is a resident of Clark  
15 County in the State of Nevada. Additionally, MARTIN SLATSKY, as parent and legal guardian  
16 of CADE SLATSKY was and is a resident of Clark County in the State of Nevada.

17 5. MARIAH MAAS as Special Administrator for the Estate of Tiffany Slatsky is a  
18 resident of Clark County in the State of Nevada.

19 6. Upon information and belief, at all relevant times, Defendants CHRISTOPHER  
20 CANDITO, ANDREW CLAPPER, NICHOLAS ROBISON, STEVEN HONSOWETZ,  
21 ANDREW STOCKER, and DOE DEFENDANTS were and are residents of Clark County in the  
22 State of Nevada.

23 7. Upon information and belief, at all relevant times, Defendants CHRISTOPHER  
24 CANDITO, ANDREW CLAPPER, NICHOLAS ROBISON, STEVEN HONSOWETZ,  
25 ANDREW STOCKER, and DOE DEFENDANTS were employees of Defendant CITY OF  
26 NORTH LAS VEGAS within the North Las Vegas Fire Department.

27 8. Defendant CITY OF NORTH LAS VEGAS (“CNLV”) was and is a municipality  
28 within the State of Nevada.

1       9.    Defendant NORTH LAS VEGAS FIRE DEPARTMENT (“NLVFD”) was and is  
2 an agency governed and funded by the City of North Las Vegas within the State of Nevada.

3       10.   At all relevant times, CNLV was the employer of Defendants CHRISTOPHER  
4 CANDITO, ANDREW CLAPPER, NICHOLAS ROBISON, STEVEN HONSOWETZ,  
5 ANDREW STOCKER, and DOE DEFENDANTS, who were North Las Vegas Fire Department  
6 firefighters/EMTs. Additionally, upon information and belief, Defendants ANDREW  
7 CLAPPER, NICHOLAS ROBISON, STEVEN HONSOWETZ, ANDREW STOCKER, and  
8 DOE DEFENDANTS were managerial, supervisory, and policymaking employees of CNLV.

9       11.   At all relevant times, Defendants CHRISTOPHER CANDITO, ANDREW  
10 CLAPPER, NICHOLAS ROBISON, STEVEN HONSOWETZ, ANDREW STOCKER, and  
11 DOE DEFENDANTS were duly authorized employees and agents of CNLV, who were acting  
12 under color of law within the course and scope of their respective duties as North Las Vegas Fire  
13 Department firefighter/EMTs, superior officers, supervisors, and/or managers and with the  
14 complete authority and ratification of their principal, Defendant CNLV.

15       12.   At all relevant times, Defendants CHRISTOPHER CANDITO, ANDREW  
16 CLAPPER, NICHOLAS ROBISON, STEVEN HONSOWETZ, ANDREW STOCKER, and  
17 DOE DEFENDANTS were duly appointed officers and/or employees or agents of CNLV,  
18 subject to oversight and supervision by CNLV’s elected and non-elected officials.

19       13.   In doing the acts and failing to act as hereinafter described, Defendants  
20 CHRISTOPHER CANDITO, ANDREW CLAPPER, NICHOLAS ROBISON, STEVEN  
21 HONSOWETZ, ANDREW STOCKER, and DOE DEFENDANTS were acting on the implied  
22 and/or actual permission and consent of CNLV.

23       14.   Defendant GNLV, LLC *dba* GOLDEN NUGGET HOTEL & CASINO is a  
24 Domestic Limited-Liability Company registered to do business in Clark County, Nevada.

25       15.   At all relevant times, Defendant DOMAIN PROPERTY OWNER LLC was a  
26 Foreign Limited-Liability Company registered to do business in Clark County, Nevada, and was  
27 the owner and/or manager of the apartment complex property located at 831 Coronado Center  
28 Drive, #1203, Henderson, NV 89052.

1       16.   At all relevant times, Defendant OAKTREE CAPITAL MANAGEMENT L.P.  
2 was a Foreign Limited Partnership registered to do business in Clark County, Nevada, and was  
3 the owner and/or manager of the apartment complex property located at 831 Coronado Center  
4 Drive, #1203, Henderson, NV 89052.

5       17.   Pursuant to NRCP 10(a) and Nurenberger Hercules-Werke GMBH v. Virostek,  
6 107 Nev. 873, 822 P.2d 1100 (1991), the identity of resident and non-resident defendants  
7 designated herein as DOE DEFENDANTS I through XX, and ROE CORPORATIONS I through  
8 X, are presently unknown to Plaintiff. Upon information and belief these DOE and ROE  
9 defendants, and each of them, were involved in the initiation, approval, support, or execution of  
10 one or more of the wrongful acts or omissions upon which this action is premised, or of similar  
11 actions directed against Plaintiff about which Plaintiff is presently unaware, and which directly  
12 and proximately caused injury and damages to Plaintiff, including but not limited to:  
13 unreasonably owning, maintaining, operating, entrusting, or repairing any vehicle that caused  
14 injury to Plaintiff. ROE and DOE defendants also include but are not limited to: a) presently  
15 unknown employers of defendant(s) who are responsible for the acts of their employees under  
16 NRS 41.745, or under the doctrine of *respondeat superior*; b) owners of the defendant's vehicle  
17 who are liable under NRS 41.440, or the family purpose doctrine; c) persons involved in the  
18 design, manufacturer distribution and placement into the stream of commerce of an unreasonably  
19 dangerous and unfit product that caused damages to Plaintiff, and which persons are strictly liable  
20 under products liability law; and, d) known witnesses whose particular culpability is not known  
21 at this time but may be made known once true facts are learned. As the specific identities of  
22 these parties are revealed through discovery, the DOE or ROE appellation will be replaced to  
23 identify these parties by their true names and capacities. Hereinafter reference to Defendant or  
24 Defendants includes DOES and ROES and each of them.

25       18.   That upon information and belief, Defendants, inclusive of DOES and ROES, and  
26 each of them, at all relevant times, were the owner, partner, servant, officer, agent, employer  
27 and/or employee of the other, and each of them, and were at all relevant times acting within the  
28

1 scope and performance of said partnership, agency, master/servant, and employment  
2 relationship.

3       19. This Court has jurisdiction over this matter under NRS 14.065 and NRS 4.370(1),  
4 as the facts alleged occurred in Clark County, Nevada and involve an amount in controversy in  
5 excess of \$15,000.00. Venue is proper pursuant to NRS 13.040, as Defendants, or any one of  
6 them resided in Clark County, Nevada at the commencement of this action.

7       **FACTUAL ALLEGATIONS COMMON TO ALL CAUSES OF ACTION**

8       20. Upon information and belief, in the weeks prior to February 21, 2020, a number  
9 of North Las Vegas Fire Department Employees, including Defendants CHRISTOPHER  
10 CANDITO, ANDREW CLAPPER, NICHOLAS ROBISON, STEVEN HONSOWETZ,  
11 ANDREW STOCKER, and DOE DEFENDANTS, planned a party that would take place at the  
12 GOLDEN NUGGET HOTEL & CASINO on February 21, 2020.

13       21. Upon information and belief, Defendants CHRISTOPHER CANDITO,  
14 ANDREW CLAPPER, NICHOLAS ROBISON, STEVEN HONSOWETZ, and ANDREW  
15 STOCKER, and DOE DEFENDANTS engaged in the purchase, trade, and sale of the illicit drugs  
16 that were to be used and distributed at the February 21, 2020 party.

17       22. That on or about February 21, 2020, Decedent, Tiffany Slatsky, attended the party  
18 at GOLDEN NUGGET HOTEL & CASINO, with her husband, Defendant CHRISTOPHER  
19 CANDITO, who was employed as a North Las Vegas firefighter at the time.

20       23. Also in attendance were a number of North Las Vegas firefighters, including, but  
21 not limited to, Defendants ANDREW CLAPPER, NICHOLAS ROBISON, STEVEN  
22 HONSOWETZ and ANDREW STOCKER.

23       24. At the time of the party, Defendant NICOLAS ROBISON was a North Las Vegas  
24 Fire Captain.

25       25. Upon information and belief, attendees at that party, including Decedent, were  
26 engaging in the use of illicit drugs including, but not limited to, morphine, cocaine, and ecstasy.

27       26. Upon information and belief, other firefighters and/or employees of Defendant  
28 CNLV were also in attendance at the February 21, 2020 party, and were involved in purchasing,

1 selling, or otherwise providing the illicit drugs used at that party and are hereby designated as  
2 DOE DEFENDANTS until such time that their identities can be verified.

3 27. Upon information and belief, CNLV superior officers and/or employees within  
4 the North Las Vegas Fire Department had knowledge of illicit drug dealings among the  
5 department employees, and either participated in, condoned, or otherwise failed to respond to  
6 such activities.

7 28. Upon information and belief, Defendants CHRISTOPHER CANDITO,  
8 ANDREW CLAPPER, NICHOLAS ROBISON, STEVEN HONSOWETZ, and ANDREW  
9 STOCKER, and DOE DEFENDANTS were stationed at North Las Vegas Fire Station 51, which  
10 had a reputation of being a “party station” with numerous employees engaged in the purchase,  
11 sale, trade, and/or use of steroids and illicit drugs.

12 29. At all relevant times, Defendants CANDITO, CLAPPER, ROBISON,  
13 HONSOWETZ, STOCKER and DOE DEFENDANTS were duly appointed employees or agents  
14 of CNLV and/or NLVFD, subject to oversight and supervision by CNLV and/or NLVFD elected  
15 and non-elected officials.

16 30. Upon information and belief, the February 21, 2020 hotel party lasted through the  
17 night and Decedent and Defendant CANDITO did not leave said party until sometime between  
18 5:00 and 7:00am on February 22, 2020.

19 31. After leaving the February 21, 2020 party, Decedent and Defendant CANDITO  
20 returned to their residence at 831 Coronado Center Drive, #1203, Henderson, NV 89052.

21 32. Upon information and belief, on February 22, 2020, after returning home from the  
22 party, Defendant CANDITO provided Decedent with morphine pills that had been obtained  
23 through dealings with Defendants CLAPPER, ROBISON, HONSOWETZ, STOCKER and DOE  
24 DEFENDANTS.

25 33. Shortly after decedent had ingested the subject morphine pills, she began slurring  
26 her words and acting irregularly. Defendant CANDITO, based on his training in emergency  
27 medical care as a North Las Vegas firefighter, believed that decedent was experiencing overdose  
28 symptoms from the subject morphine pills.

1       34. On or about February 22, 2020, Defendant CANDITO took decedent from their  
2 residence in Henderson to North Las Vegas Fire Station 51, upon recognizing the overdose  
3 symptoms she was exhibiting. Rather than taking decedent to the nearest hospital, which was  
4 only minutes away, Defendant CANDITO took decedent to his fire station, located  
5 approximately 23 miles away, to administer his own medical care.

6       35. Defendant CANDITO used his employee key card to enter North Las Vegas Fire  
7 Station 51, and retrieve Narcan, Zofran, and IV equipment from the station's medical supplies,  
8 so that he could administer those medications to Decedent.

9       36. If Defendant CANDITO was not a CNLV employee and North Las Vegas  
10 firefighter at Station 51, he would not have been able to enter the building and access those  
11 medical supplies.

12       37. Upon information and belief, the CNLV and NLVFD's regulation and oversight  
13 of its employees and medical supply stock were so woefully inadequate that Defendant  
14 CANDITO was permitted to enter Station 51 and have unfettered access to dangerous  
15 medications and other medical supplies without question or repercussion.

16       38. After retrieving those medications and medical supplies, Defendant CANDITO  
17 went back to his vehicle where he had left Decedent, started an IV in Decedent's right arm, and  
18 administered approximately two milligrams of Narcan. In doing so, Defendant CANDITO acted  
19 under color of law as a CNLV employee and North Law Vegas firefighter/EMT. The ordinary  
20 private citizen would not have the requisite knowledge, training, and experience to administer an  
21 IV of Narcan, nor would an ordinary citizen have had access to the medical supplies, which  
22 Defendant CANDITO obtained at Station 51 and by virtue of his position as a CNLV employee  
23 and North Las Vegas firefighter/EMT.

24       39. Defendant CANDITO had been trained on details related to the use,  
25 administration, and other specifics related to Narcan as part of his training for the North Las  
26 Vegas Fire Department.

27  
28

1       40.    After administering Narcan in his vehicle, Defendant CANDITO drove decedent  
2 back to their residence and Decedent and Defendant CANDITO fell asleep at approximately  
3 2:00am on February 23, 2020.

4       41.    Upon information and belief, firefighters and medics are trained that Narcan is  
5 only a “temporary blocker” and it is still necessary to transport an individual suspected to be  
6 overdosing to a hospital for further evaluation and monitoring. Accordingly, Defendant  
7 CANDITO either was not properly trained with regards to Narcan administration or he violated  
8 his training with regards to administering Narcan and then returning home, rather than to a  
9 hospital.

10      42.    At approximately 8:30am on February 23, 2020, Defendant CANDTIO awoke  
11 and found Decedent unresponsive. At that time, Defendant CANDITO had 911 contacted and  
12 emergency medical personnel were dispatched to the subject residence.

13      43.    Prior to paramedics arriving, Defendant CANDITO carried Decedent out to a  
14 nearby curb, and awaited the arrival of medical personnel. When paramedics arrived, they  
15 initially took Decedent back into the residence before then transporting her to the hospital where  
16 she was ultimately pronounced dead on February 23, 2020.

17      44.    Upon information and belief, Decedent died as a result of multiple drug  
18 intoxication, including morphine.

19      45.    Thereafter, Henderson PD conducted an investigation of the incident, and  
20 specifically, the subject residence. Various substances were retrieved from the scene, including  
21 psilocybin, MDMA, morphine, cocaine, and tadalafil. Additional medical supplies, including  
22 syringes and saline for intravenous use, were also located inside of the subject residence.

23      46.    Defendants’ CANDITO, CLAPPER, ROBISON, HONSOWETZ, STOCKER  
24 and DOE DEFENDANTS misuse of power, as described above, possessed by virtue of their  
25 employment with the CNLV and NLVFD, is action taken under the color of state law. Indeed, a  
26 defendant in a 42 U.S.C. section 1983 lawsuit acts under the color of state law when he abuses  
27 the position given to him by the state.

28      ///

## **FIRST CAUSE OF ACTION**

**Denial of Medical Care (42 U.S.C. § 1983) against Defendant CANDITO and Defendant  
CNLV and Defendant NLVFD**

47. Plaintiffs repeat and re-allege each and every allegation in all preceding paragraphs of this Complaint with the same force and effect as if fully set forth herein.

6       48.     At all relevant times, CANDITO was acting under color of state law. Further, at  
7 all relevant times, CANDITO was acting within his official capacity, and the CNLV and NLVFD  
8 were a moving force behind the violations of Decedent's constitutional rights, including the right  
9 to timely medical care under the Fourth Amendment. When CANDITO provided illicit morphine  
10 pills to Decedent and then denied Decedent timely medical care, he exercised power possessed  
11 by virtue of state law and made possible only because CANDITO was clothed with the authority  
12 of state law. CANDITO was employed by the state and abused the position given to him by the  
13 state; thus, he acted under color of state law. Further, CANDITO's actions—including providing  
14 the illicit morphine pills, refusing to take Decedent to the hospital after Decedent exhibited  
15 overdose symptoms, providing his own personal medical treatment to Decedent with medications  
16 and medical supplies he was given free access to at North Las Vegas Fire Station 51—were  
17 performed while CANDITO was acting, purporting to act, or pretending to act in the performance  
18 of his official duties as a firefighter/EMT for the CNLV and/or NLVFD. Additionally,  
19 CANDITO's pretense of acting in the performance of his official duties had the purpose and  
20 effect of influencing the behavior of Decedent, percipient witnesses, and his employer the CNLV  
21 and/or NLVFD. Third, CANDITO's conduct was related in a meaningful way to his status as a  
22 firefighter/EMT for the CNLV and/or NLVFD and performance of his duties as a  
23 firefighter/EMT for the CNLV and/or NLVFD. CANDITO is sued in both his official capacity  
24 and his individual capacity on this claim.

25        49. After providing Decedent with the illicit morphine pills—knowing that she had  
26 also ingested a number of other substances, CANDITO did not timely summon reasonable  
27 medical attention for Decedent when he suspected that Decedent was showing symptoms of an

1 overdose. CANDITO also prevented medical personnel from timely rendering medical  
2 aid/assistance to Decedent.

3 50. Defendant CANDITO caused an undue delay and an interference to provide  
4 timely medical treatment.

5 51. CANDITO knew that the failure to provide timely medical treatment to Decedent  
6 could result in further significant injury or the unnecessary and wanton infliction of pain, but  
7 disregarded that serious medical need, causing Decedent great bodily harm and causing  
8 Decedent's death.

9 52. As a result of the denial of medical care, Decedent suffered extreme mental and  
10 physical pain and suffering, loss of enjoyment of life, the loss of her life, and the loss of her  
11 earning capacity.

12 53. The conduct of Defendant CANDITO was willful, wanton, malicious and done  
13 with reckless disregard for the rights and safety of Decedent and therefore warrants the  
14 imposition of exemplary and punitive damages.

15 54. Also as a direct and proximate result of the aforementioned conduct, Plaintiff  
16 CADE SLATSKY has been deprived of the life-long love, companionship, comfort, support,  
17 society, and care of Decedent, and will continue to be so deprived for the remainder of his natural  
18 life.

19 55. MARIAH MAAS and MARTIN SLATSKY bring this claim in representative  
20 capacities as the appointed special administrator of Decedent's Estate, and legal guardian of  
21 Decedent's surviving child, CADE SLATSKY, respectively.

22 56. Plaintiffs also seek attorneys' fees and costs under this claim.

23 **SECOND CAUSE OF ACTION**

24 **Fourteenth Amendment—Substantive Due Process, Interference with Familial Relations**

25 **(42 U.S.C. § 1983) against Defendants CANDITO, CLAPPER, ROBISON,  
26 HONSOWETZ, STOCKER, and DOE DEFENDANTS, Defendant CNLV, and Defendant**

27 **NLVFD**

28

1       57. Plaintiffs repeat and re-allege each and every allegation in all preceding  
2 paragraphs of this Complaint with the same force and effect as if fully set forth herein.

3       58. At all relevant times, Defendants CANDITO, CLAPPER, ROBISON,  
4 HONSOWETZ, STOCKER, and DOE DEFENDANTS were acting under color of state law.  
5 Further, at all relevant times, Defendants CANDITO, CLAPPER, ROBISON, HONSOWETZ,  
6 STOCKER, and DOE DEFENDANTS were acting within their official capacity, and the CNLV  
7 and NLVFD were a moving force behind the violations of Decedent's constitutional rights,  
8 including the right to timely medical care under the Fourth Amendment. When Defendants  
9 CANDITO, CLAPPER, ROBISON, HONSOWETZ, STOCKER, and DOE DEFENDANTS  
10 procured and/or provided illicit drugs, including morphine pills for Decedent and then denied  
11 Decedent timely medical care, they exercised power possessed by virtue of state law and made  
12 possible only because Defendants clothed with the authority of state law. Defendants  
13 CANDITO, CLAPPER, ROBISON, HONSOWETZ, STOCKER, and DOE DEFENDANTS  
14 were employed by the state and abused the position given to them by the state; thus, they acted  
15 under color of state law. Further, Defendants' actions and/or inactions—including providing the  
16 illicit drugs, including morphine pills, refusing to take Decedent to the hospital after Decedent  
17 exhibited overdose symptoms, providing personal medical treatment to Decedent with  
18 medications and medical supplies Defendant CANDITO was given free access to at North Las  
19 Vegas Fire Station 51—were performed while Defendants were acting, purporting to act, or  
20 pretending to act in the performance of their official duties as firefighter/EMTs, officers,  
21 managers, and/or supervisors for the CNLV and/or NLVFD. Additionally, Defendants' pretense  
22 of acting in the performance of their official duties had the purpose and effect of influencing the  
23 behavior of Decedent, percipient witnesses, and their employer the CNLV and/or NLVFD.  
24 Third, Defendants' conduct was related in a meaningful way to their status as firefighter/EMTs,  
25 officers, managers, and/or supervisors for the CNLV and/or NLVFD and performance of their  
26 duties for the CNLV and/or NLVFD. Defendants are sued in both their official capacity and  
27 their individual capacity on this claim.

1       59. Plaintiff CADE SLATSKY, through his legal guardian MARTIN SLATSKY, had  
2 a cognizable interest under the Due Process Clause of the Fourteenth Amendment to the United  
3 States Constitution to be free from state actions that deprive him of life, liberty, or property in  
4 such a manner as to shock the conscience, including but not limited to unwarranted state  
5 interference in his family relationship with his mother, Decedent.

6       60. Decedent had a cognizable interest under the Due Process Clause of the  
7 Fourteenth Amendment of the United States Constitution to be free from state actions that deprive  
8 her of her right to life, liberty, or property in such a manner as to shock the conscience.

9       61. The aforementioned actions of Defendants CANDITO, CLAPPER, ROBISON,  
10 HONSOWETZ, STOCKER, and DOE DEFENDANTS and CNLV, including the provision of  
11 illicit morphine pills and denial of medical care, along with other undiscovered conduct, to  
12 Decedent, shock the conscience, in that Defendants CANDITO, CLAPPER, ROBISON,  
13 HONSOWETZ, STOCKER, and DOE DEFENDANTS, CNLV, and NLVFD acted and/or failed  
14 to act with deliberate indifference to the constitutional rights of Decedent and Plaintiff CADE  
15 SLATSKY.

16       62. Defendants CANDITO, CLAPPER, ROBISON, HONSOWETZ, STOCKER,  
17 and DOE DEFENDANTS, CNLV, and NLVFD thus violated the substantive due process rights  
18 of Plaintiff CADE SLATSKY to be free from unwarranted interference with his familial  
19 relationship with Decedent, his mother.

20       63. Also as a direct and proximate result of the aforementioned conduct, Plaintiff  
21 CADE SLATSKY has been deprived of the life-long love, companionship, comfort, support,  
22 society, and care of Decedent, and will continue to be so deprived for the remainder of his natural  
23 life.

24       64. MARIAH MAAS and MARTIN SLATSKY bring this claim in representative  
25 capacities as the appointed special administrator of Decedent's Estate, and legal guardian of  
26 Decedent's surviving child, CADE SLATSKY, respectively.

27       65. Plaintiffs also seek attorneys' fees and costs under this claim.

28       ///

### **THIRD CAUSE OF ACTION**

## Unconstitutional Custom or Policy (42 U.S.C. § 1983 and *Monell*) against Defendants

CANDITO, CLAPPER, ROBISON, HONSOWETZ, STOCKER, and DOE

**DEFENDANTS (in their official capacity), Defendant CNLV, and Defendant NLVFD**

66. Plaintiffs repeat and re-allege each and every allegation in all preceding paragraphs of this Complaint with the same force and effect as if fully set forth herein.

67. The acts of Defendants deprived Plaintiffs and Decedent of their rights under the United States Constitution.

9       68. At all relevant times, Defendants CANDITO, CLAPPER, ROBISON,  
10 HONSOWETZ, STOCKER, and DOE DEFENDANTS were acting under color of state law.  
11 Further, at all relevant times, Defendants CANDITO, CLAPPER, ROBISON, HONSOWETZ,  
12 STOCKER, and DOE DEFENDANTS were acting within their official capacity, and the CNLV  
13 was a moving force behind the violations of Decedent's constitutional rights, including the right  
14 to timely medical care under the Fourth Amendment. When Defendants CANDITO, CLAPPER,  
15 ROBISON, HONSOWETZ, STOCKER, and DOE DEFENDANTS procured and/or provided  
16 illicit drugs, including morphine pills for Decedent and then denied Decedent timely medical  
17 care, they exercised power possessed by virtue of state law and made possible only because  
18 Defendants clothed with the authority of state law. Defendants CANDITO, CLAPPER,  
19 ROBISON, HONSOWETZ, STOCKER, and DOE DEFENDANTS were employed by the state  
20 and abused the position given to them by the state; thus, they acted under color of state law.  
21 Further, Defendants' actions and/or inactions—including providing the illicit drugs, including  
22 morphine pills, refusing to take Decedent to the hospital after Decedent exhibited overdose  
23 symptoms, providing personal medical treatment to Decedent with medications and medical  
24 supplies Defendant CANDITO was given free access to at North Las Vegas Fire Station 51—  
25 were performed while Defendants were acting, purporting to act, or pretending to act in the  
26 performance of their official duties as firefighter/EMTs, officers, managers, and/or supervisors  
27 for the CNLV and/or NLVFD. Additionally, Defendants' pretense of acting in the performance  
28 of their official duties had the purpose and effect of influencing the behavior of Decedent,

1 percipient witnesses, and their employer the CNLV and/or NLVFD. Third, Defendants' conduct  
2 was related in a meaningful way to their status as firefighter/EMTs, officers, managers, and/or  
3 supervisors for the CNLV and/or NLVFD and performance of their duties for the CNLV and/or  
4 NLVFD. Defendants are sued in both their official capacity and their individual capacity on this  
5 claim.

6 69. During this incident, Defendants CANDITO, CLAPPER, ROBISON,  
7 HONSOWETZ, STOCKER, and DOE Defendants acted pursuant to customs, practices, and  
8 policies of CNLV and/or NLVFD.

9 70. On information and belief, prior to the subject incident, Defendants CANDITO,  
10 CLAPPER, ROBISON, HONSOWETZ, STOCKER, and DOE DEFENDANTS were not  
11 disciplined, reprimanded, retrained, suspended, or otherwise penalized for any similar conduct,  
12 including the use and provision of illicit drugs within the NLVFD or among CNLV employees,  
13 and the denial of medical care.

14 71. Defendants CNLV and NLVFD, as policymakers and supervisors, maintained,  
15 *inter alia*, the following unconstitutional customs or policies:

- 16 a) Authorizing and/or encouraging firefighter/EMTs, officers, managers, and/or  
17 supervisors to use NLVFD medical supplies and/or medications for personal  
18 use;
- 19 b) Complete lack of supervision and oversight of medical supply stocks within  
20 the NLVFD, despite the stock including dangerous and addictive substances;
- 21 c) Failure to train NLVFD employees regarding the appropriate use of available  
22 life-saving measures and/or providing appropriate medical care to individuals  
23 experiencing overdose symptoms from the use of such substances;
- 24 d) Employing and retaining as firefighter/EMTs, officers, managers, and/or  
25 supervisors, including Defendants CANDITO, CLAPPER, ROBISON,  
26 HONSOWETZ, STOCKER, and DOE DEFENDANTS, at all times material  
27 herein, which it knew or should have known had dangerous propensities for  
28 abusing their authority and access to medical supplies and medication,

1 using/trading/selling illicit drugs, and failing to follow written CNLV and/or  
2 NLVFD policies;

3 e) Maintaining a policy of inaction and an attitude of indifference towards illicit  
4 drug use and abuse of authority within the NLVFD.

5 72. The above mentioned policies, practices, and customs were followed by CNLV  
6 and NLVFD with such duration and frequency that employees considered them customary and  
7 accepted by the organization.

8 73. Defendants CANDITO, CLAPPER, ROBISON, HONSOWETZ, STOCKER,  
9 and DOE DEFENDANTS had either actual or constructive knowledge of the different policies,  
10 practices, and customs alleged in the paragraphs above. Despite having knowledge as stated  
11 above, Defendants CANDITO, CLAPPER, ROBISON, HONSOWETZ, STOCKER, DOE  
12 DEFENDANTS, CNLV, and NLVFD condoned, tolerated and through actions and inactions  
13 ratified such policies. Such Defendants also acted with deliberate indifference to both the  
14 foreseeable effects and consequences of these policies and to the constitutional rights of Plaintiffs  
15 and Decedent.

16 74. As a NLVFD Captain, Defendant ROBISON was a superior officer within the  
17 organization. Defendant ROBISON's involvement in the above mentioned policies, practices,  
18 and customs evidences actual notice and deliberate indifference to the foreseeable consequences  
19 of these practices, but also, constitutes an act by an individual with policy-making authority.

20 75. By perpetuating, sanctioning, tolerating, and ratifying Defendants CANDITO,  
21 CLAPPER, ROBISON, HONSOWETZ, STOCKER, and DOE DEFENDANTS' outrageous  
22 conduct and other wrongful acts, Defendants CNLV and NLVFD acted with an intentional,  
23 reckless, callous disregard for the well-being of Plaintiffs and Decedent, and their constitutional  
24 rights. Furthermore, the policies, practices, and customs implemented, maintained, and still  
25 tolerated by Defendants CNLV and NLVFD were affirmatively linked to and were a significant  
26 influential force behind the constitutional violations and injuries/death of Decedent.

27 76. As a direct and proximate result of the aforementioned unconstitutional policies  
28 and customs, Decedent experienced severe physical and emotional pain and suffering and death.

1       77. Also as a direct and proximate result of the aforementioned conduct, Plaintiff  
2 CADE SLATSKY has been deprived of the life-long love, companionship, comfort, support,  
3 society, and care of Decedent, and will continue to be so deprived for the remainder of his natural  
4 life.

5       78. Accordingly, Defendants CANDITO, CLAPPER, ROBISON, HONSOWETZ,  
6 STOCKER, and DOE DEFENDANTS, in their official capacity, CNLV, and NLVFD are each  
7 liable to Plaintiffs for compensatory damages under 42 U.S.C. § 1983 and *Monell* on this claim.

8       79. MARIAH MAAS and MARTIN SLATSKY bring this claim in representative  
9 capacities as the appointed special administrator of Decedent's Estate, and legal guardian of  
10 Decedent's surviving child, CADE SLATSKY, respectively.

11       80. Plaintiffs also seek attorneys' fees and costs under this claim.

#### **FOURTH CAUSE OF ACTION**

##### **Negligence against Defendants CANDITO, CLAPPER, ROBISON, HONSOWETZ, STOCKER, and DOE Defendants**

15       81. Plaintiffs repeat and re-allege each and every allegation contained in the preceding  
16 paragraphs as though fully set forth herein.

17       82. Defendants CANDITO, CLAPPER, ROBISON, HONSOWETZ, STOCKER,  
18 and DOE DEFENDANTS had a duty of reasonable care within their interactions and  
19 involvement with Decedent.

20       83. Defendants CANDITO, CLAPPER, ROBISON, HONSOWETZ, STOCKER,  
21 and DOE DEFENDANTS breached that duty of care toward decedent by providing or procuring  
22 illicit drugs, including but not limited to the subject morphine pills, for Decedent and encouraging  
23 Decedent's use of those illicit drugs.

24       84. Defendant CANDITO breached his duty of reasonable care toward decedent  
25 further by failing to seek appropriate medical attention for Decedent when he believed she was  
26 experiencing a morphine overdose, and instead, taking Decedent to his own fire station to provide  
27 his own treatment and returning home.

28

1       85.     As a direct and proximate result of Defendants' conduct as alleged above, and any  
2 other negligent conduct discovered in the future, Decedent was caused to suffer severe pain,  
3 suffering, and fear. Further, as a direct and proximate result of Defendants' conduct, Decedent  
4 ultimately died.

5       86.     Defendants acted with actual malice toward Decedent and Plaintiffs by displaying  
6 a reckless disregard for human life through procuring or providing illicit drugs and denial of  
7 medical care to Decedent, warranting exemplary or punitive damages.

8       87.     As a direct and proximate result of the aforementioned conduct, Plaintiff CADE  
9 SLATSKY has been deprived of the life-long love, companionship, comfort, support, society,  
10 and care of Decedent, and will continue to be so deprived for the remainder of his natural life.

11       88.     MARIAH MAAS and MARTIN SLATSKY bring this claim in representative  
12 capacities as the appointed special administrator of Decedent's Estate, and legal guardian of  
13 Decedent's surviving child, CADE SLATSKY, respectively.

14       89.     Plaintiffs also seek attorneys' fees and costs under this claim.

#### FIFTH CAUSE OF ACTION

#### **Civil Liability for Violation of NRS 41.700 against Defendants CANDITO, CLAPPER, ROBISON, HONSOWETZ, STOCKER, and DOE Defendants**

18       90.     Plaintiffs repeat and re-allege each and every allegation contained in the preceding  
19 paragraphs as though fully set forth herein.

20       91.     NRS 41.700 states as follows:

21       1. A person who:

- 22           a. Knowingly and unlawfully serves, sells or otherwise furnishes a  
23           controlled substance to another person; or
- 24           b. Knowingly allows another person to use a controlled substance in an  
25           unlawful manner on premises or in a conveyance belonging to the  
26           person allowing the use or over which the person has control, is liable  
27           in a civil action for any damages caused as a result of the person using  
28           the controlled substance.

1                   2. A person who prevails in an action brought pursuant to subsection 1 may  
2                   recover his or her actual damages, attorneys' fees and costs and any punitive  
3                   damages that the facts may warrant.

4                   92. Upon information and belief Defendants CANDITO, CLAPPER, ROBISON,  
5                   HONSOWETZ, STOCKER, and DOE DEFENDANTS knowingly and unlawfully served, sold,  
6                   or otherwise furnished one of more controlled substances to Decedent on or about February 21,  
7                   2020 and February 22, 2020.

8                   93. Alternatively, upon information and belief, Defendants CANDITO, CLAPPER,  
9                   ROBISON, HONSOWETZ, STOCKER, and DOE DEFENDANTS knowingly allowed  
10                  Decedent to use a controlled substance in an unlawful manner on premises or in a conveyance  
11                  belonging to the person allowing the use or over which the person has control on or about  
12                  February 21, 2020 and February 22, 2020.

13                  94. At all times relevant hereto, Defendants CANDITO, CLAPPER, ROBISON,  
14                  HONSOWETZ, STOCKER, and DOE DEFENDANTS were employed by CNLV and/or  
15                  NLVFD, and pursuant to the doctrine of *respondeat superior*, CNLV and/or NLVFD, are liable  
16                  to Plaintiffs for the injuries and damages caused by Defendants' wrongful acts, as alleged herein.

17                  95. As a direct and proximate result of Defendants' conduct as alleged above, and any  
18                  other conduct discovered in the future, Decedent was caused to suffer severe pain, suffering, and  
19                  fear. Further, as a direct and proximate result of Defendants' conduct in violation of NRS 41.700,  
20                  Decedent ultimately died.

21                  96. Defendants acted with actual malice toward Decedent and Plaintiffs by displaying  
22                  a reckless disregard for human life through procuring or providing illicit drugs and denial of  
23                  medical care to Decedent, warranting exemplary or punitive damages.

24                  97. As a direct and proximate result of the aforementioned conduct, Plaintiff CADE  
25                  SLATSKY has been deprived of the life-long love, companionship, comfort, support, society,  
26                  and care of Decedent, and will continue to be so deprived for the remainder of his natural life.

27  
28

1 98. MARIAH MAAS and MARTIN SLATSKY bring this claim in representative  
2 capacities as the appointed special administrator of Decedent's Estate, and legal guardian of  
3 Decedent's surviving child, CADE SLATSKY, respectively.

4 99. Plaintiffs also seek attorneys' fees and costs under this claim.

## **SIXTH CAUSE OF ACTION**

**Violations of the Constitution of the State of Nevada against Defendants CANDITO,  
CLAPPER, ROBISON, HONSOWETZ, STOCKER, and DOE DEFENDANTS (in their  
official capacity), Defendant CNLV, and Defendant NLVFD**

9           100. Plaintiffs repeat and re-allege each and every allegation contained in the preceding  
10 paragraphs as though fully set forth herein.

11       101. The State of Nevada and its political subdivisions have waived their immunity  
12 from liability and consented to have its liability determined in accordance with the same rules of  
13 law as are applied to civil actions against natural persons and corporations.

14       102. The laws of the State of Nevada allow for action for injury, wrongful death or  
15 other damage resulting from the deprivation of any rights, privileges or immunities secured by  
16 the Constitution of the State of Nevada.

17        103. Nev. Const. Art. 1, § 8(2) states that no person shall be deprived of life, liberty,  
18 or property, without due process of law.

19 104. The Due Process Clause of the Nevada Constitution protects individuals from  
20 state actions that deprive them of life, liberty, or property without due process of law.

21       105. At all times relevant hereto, Defendants CANDITO, CLAPPER, ROBISON,  
22 HONSOWETZ, STOCKER, and DOE DEFENDANTS, in their official capacity, CNLV, and  
23 NLVFD, by and through its employees, agents, contractors, and/or staff, including but not limited  
24 to Defendant Employees, violated the Constitution of the State of Nevada by causing Decedent  
25 and Plaintiffs to be deprived of the rights, privileges, and/or immunities secured in the  
26 Constitution of the State of Nevada, as alleged herein, and by failing to adhere to their oath of  
27 office.

1       106. At all times relevant hereto, Defendants CANDITO, CLAPPER, ROBISON,  
2 HONSOWETZ, STOCKER, and DOE DEFENDANTS were employed by CNLV and/or  
3 NLVFD, and pursuant to the doctrine of *respondeat superior*, CNLV and/or NLVFD, are liable  
4 to Plaintiffs for the injuries and damages caused by Defendants' wrongful acts, as alleged herein.

5       107. At all times relevant hereto, Decedent and Plaintiff CADE SLATSKY were  
6 citizens of the State of Nevada, and individuals who was entitled to the protections of Nev. Const.  
7 Art. 1, § 8(2), as protected under the Nevada Constitution.

8       108. The Due Process Clause under the Nev. Const. Art. 1, § 6, requires that the  
9 procedures by which laws are applied be fundamentally fair, so that individuals are not subjected  
10 to the arbitrary exercise of government power. The appropriate framework for assessing  
11 procedural rules requires a determination as to whether the procedures are offensive to the  
12 concept of fundamental fairness.

13       109. The denial of medical care by Defendants, and each of them, deprived Decedent  
14 of her rights under the Nevada Constitution as set forth herein.

15       110. Defendants, and each of them, knew that failure to provide timely medical  
16 treatment to Decedent could result in further significant injury or the unnecessary and wanton  
17 infliction of pain, but disregarded that serious need, causing Decedent great bodily harm and  
18 eventual death.

19       111. Decedent had a right, clearly established and enforceable, as protected under the  
20 Nevada Constitution, to be free from neglect and physical abuse by Defendants. As a direct and  
21 proximate result of Defendant's conduct, Decedent was denied due process of law as protected  
22 under the Nevada Constitution, by Defendants' provision of illicit drugs and failure to render her  
23 aid while in their control and custody. The Defendants' conduct was offensive to the concept of  
24 fundamental fairness, protected under the Nevada Constitution.

25       112. That the wrongful and unlawful acts perpetrated by the Defendants and each of  
26 them, in intentionally disregarding the Nevada constitutional rights of Decedent were willful,  
27 oppressive, malicious, and performed with a wanton disregard for the established and  
28 constitutionally protected rights of Decedent.

1       113. As a direct and proximate result of the aforementioned conduct, Plaintiff CADE  
2 SLATSKY has been deprived of the life-long love, companionship, comfort, support, society,  
3 and care of Decedent, and will continue to be so deprived for the remainder of his natural life.

4       114. MARIAH MAAS and MARTIN SLATSKY bring this claim in representative  
5 capacities as the appointed special administrator of Decedent's Estate, and legal guardian of  
6 Decedent's surviving child, CADE SLATSKY, respectively.

7       115. Plaintiffs also seek attorneys' fees and costs under this claim.

#### SEVENTH CAUSE OF ACTION

##### **False Imprisonment against Defendants CANDITO, CNLV, and NLVFD**

10      116. Plaintiffs repeat and re-allege each and every allegation contained in the preceding  
11 paragraphs as though fully set forth herein.

12      117. Defendant CANDITO, while acting under color of law and within the course and  
13 scope of his duties as a CNLV and/or NLVFD employee, intentionally deprived Decedent of her  
14 freedom of movement by use of force, fraud, deceit, and unreasonable duress.

15      118. The conduct of Defendant CANDITO was a substantial factor in causing the harm  
16 and death of Decedent.

17      119. CNLV and NLVFD are vicariously liable for the wrongful acts of Defendant  
18 CANDITO because such acts were undertaken under color of law and within the course and  
19 scope of Defendant CANDITO's duties as a NLVFD firefighter/EMT.

20      120. The conduct of Defendant CANDITO was malicious, wanton, oppressive, and  
21 accomplished with a conscious disregard for the rights of Decedent, entitling Plaintiffs to an  
22 award of exemplary and punitive damages.

23      121. As a direct and proximate result of the aforementioned conduct, Plaintiff CADE  
24 SLATSKY has been deprived of the life-long love, companionship, comfort, support, society,  
25 and care of Decedent, and will continue to be so deprived for the remainder of his natural life.

26      122. MARIAH MAAS and MARTIN SLATSKY bring this claim in representative  
27 capacities as the appointed special administrator of Decedent's Estate, and legal guardian of  
28 Decedent's surviving child, CADE SLATSKY, respectively.

123. Plaintiffs also seek attorneys' fees and costs under this claim.

2 **EIGHTH CAUSE OF ACTION**

3 **Battery against Defendants CANDITO, CNLV, and NLVFD**

4 124. Plaintiffs repeat and re-allege each and every allegation contained in the  
5 preceding paragraphs as though fully set forth herein.

6 125. Defendant CANDITO, while acting under color of law and within the course and  
7 scope of his duties as a CNLV and/or NLVFD employee, intentionally touched and physically  
8 harmed Decedent, in a number of unwanted ways, including, but not limited to, carrying  
9 Decedent's body to and from her home and Defendant CANDITO's vehicle, piercing Decedent's  
10 skin to administer IV medication at North Las Vegas Fire Station 51, and other manipulations of  
11 Decedent's body while providing improper medical care.

12 126. As a result of Defendant CANDITO's actions, Decedent suffered severe pain and  
13 suffering and ultimately died. Defendant CANDITO had no permission to carry out the  
14 aforementioned physical interactions with Decedent's body.

15 127. The conduct of Defendant CANDITO was a substantial factor in causing the harm  
16 and death of Decedent.

17 128. CNLV and NLVFD are vicariously liable for the wrongful acts of Defendant  
18 CANDITO because such acts were undertaken under color of law and within the course and  
19 scope of Defendant CANDITO's duties as a NLVFD firefighter/EMT.

20 129. The conduct of Defendant CANDITO was malicious, wanton, oppressive, and  
21 accomplished with a conscious disregard for the rights of Decedent, entitling Plaintiffs to an  
22 award of exemplary and punitive damages.

23 130. As a direct and proximate result of the aforementioned conduct, Plaintiff CADE  
24 SLATSKY has been deprived of the life-long love, companionship, comfort, support, society,  
25 and care of Decedent, and will continue to be so deprived for the remainder of his natural life.

26 131. MARIAH MAAS and MARTIN SLATSKY bring this claim in representative  
27 capacities as the appointed special administrator of Decedent's Estate, and legal guardian of  
28 Decedent's surviving child, CADE SLATSKY, respectively.

132. Plaintiffs also seek attorneys' fees and costs under this claim.

2 **NINTH CAUSE OF ACTION**

3 **Negligent Security against Defendants GNLV, LLC, DOMAIN PROPERTY OWNER**  
4 **LLC, and OAKTREE CAPITAL MANAGEMENT L.P.**

5 133. Plaintiffs repeat and re-allege each and every allegation contained in the preceding  
6 paragraphs as though fully set forth herein.

7 134. Decedent was an invitee on Defendant GNLV, LLC's property on February 21,  
8 2020 through February 22, 2020.

9 135. Additionally, Decedent was a resident of an apartment located at 831 Coronado  
10 Center Drive, #1203, Henderson, NV 89052. Said property was owned and/or managed by  
11 Defendants DOMAIN PROPERTY OWNER LLC and/or OAKTREE CAPITAL  
12 MANAGEMENT L.P.;

13 136. GNLV, LLC, as a property owner and innkeeper, owed Decedent a duty to  
14 exercise reasonable care while she was present on their property.

15 137. DOMAIN PROPERTY OWNER LLC and OAKTREE CAPITAL  
16 MANAGEMENT L.P. owed Decedent a duty of reasonable care to keep the property secure for  
17 its residents and guests.

18 138. Defendant GNLV, LLC had either actual or constructive knowledge of the hotel  
19 party taking place in the paragraphs above. Despite having knowledge as stated above,  
20 Defendant GNLV, LLC condoned, tolerated and through actions and inactions ratified the  
21 conduct exhibited at the party, including extensive illicit drug use.

22 139. It is foreseeable that drugs would be present and taken at a hotel party, such as the  
23 one described above. Likewise, it is foreseeable that a person in attendance at a party such as the  
24 one described above would suffer injury, up to and including death, as a result of an all-night  
25 hotel party.

26 140. Defendant GNLV, LLC failed to take reasonable precautions, including, but not  
27 limited to, providing adequate security personnel and equipment, to prevent hotel guests from  
28

1 holding a party on their premises in which extensive illicit drugs were available, distributed, and  
2 consumed by party-goers.

3       141. Defendant GNLV, LLC failed to exercise due care for the safety of Decedent by  
4 allowing their property to be used to hold a party in which extensive illicit drugs were available,  
5 distributed, and consumed by party-goers.

6       142. Upon information and belief, prior incidents of similar parties, resulting in acute  
7 drug intoxication, overdose, and death have occurred on the premises and Defendant GNLV,  
8 LLC is aware of said incidents.

9       143. Further, Defendants DOMAIN PROPERTY OWNER LLC and OAKTREE  
10 CAPITAL MANAGEMENT L.P. had either actual or constructive knowledge of the illicit drug  
11 use and distribution taking place on their property, as discussed in the paragraphs above. Despite  
12 having knowledge as stated above, Defendants DOMAIN PROPERTY OWNER LLC and  
13 OAKTREE CAPITAL MANAGEMENT L.P. condoned, tolerated and through actions and  
14 inactions ratified the conduct.

15       144. Defendants DOMAIN PROPERTY OWNER LLC and OAKTREE CAPITAL  
16 MANAGEMENT L.P. failed to take reasonable precautions, including, but not limited to,  
17 providing adequate security personnel and equipment, to prevent residents and guests from  
18 distributing and using illicit drugs on their premises.

19       145. Defendants DOMAIN PROPERTY OWNER LLC and OAKTREE CAPITAL  
20 MANAGEMENT L.P. failed to exercise due care for the safety of Decedent by allowing their  
21 property to be used for the distribution and use of illicit drugs.

22       146. As a direct and proximate result of Defendants' conduct as alleged above, and any  
23 other conduct discovered in the future, Decedent was caused to suffer severe pain, suffering, fear,  
24 and death. Further, as a direct and proximate result of Defendants' conduct in violation of NRS  
25 41.700, Decedent ultimately died.

26       147. Defendants acted with actual malice toward Decedent and Plaintiffs by displaying  
27 a reckless disregard for human life through procuring or providing illicit drugs and denial of  
28 medical care to Decedent, warranting exemplary or punitive damages.

1       148. As a direct and proximate result of the aforementioned conduct, Plaintiff CADE  
2 SLATSKY has been deprived of the life-long love, companionship, comfort, support, society,  
3 and care of Decedent, and will continue to be so deprived for the remainder of his natural life.

4       149. MARIAH MAAS and MARTIN SLATSKY bring this claim in representative  
5 capacities as the appointed special administrator of Decedent's Estate, and legal guardian of  
6 Decedent's surviving child, CADE SLATSKY, respectively.

7       150. Plaintiffs also seek attorneys' fees and costs under this claim.

8       Plaintiffs, expressly reserving the right to amend this Complaint at the time of trial to  
9 include all items of damages not yet ascertained, demands judgment against Defendants, and  
10 each of them, as follows:

- 11       1. General damages in excess of \$15,000;
- 12       2. Special and/or pecuniary damages in excess of \$15,000;
- 13       3. For damages related to Plaintiffs' grief, sorrow, loss of support, society,  
14                    companionship, and comfort, in an amount to be proven at trial;
- 15       4. For punitive damages on all causes of action;
- 16       5. For equitable relief that Defendants CNLV and NLFV be required to adopt  
17                    policies to prevent further incidents such as complained of herein;
- 18       6. For equitable relief that Defendants CNLV and NLFV be required to comply  
19                    with training requirements for its employees to prevent further incidents such as  
20                    complained of herein;
- 21       7. For equitable relief that Defendants CANDITO, CLAPPER, ROBISON,  
22                    HONSOWETZ, STOCKER, and DOE DEFENDANTS be investigated and  
23                    disciplined including, but not limited to, termination of employment;
- 24       8. For any and all pre and post-judgment interest as permitted by law;
- 25       9. For reasonable attorneys' fees and costs of suit; and
- 26       10. For such other and further relief as the court deems just and proper.

27       DATED this 7<sup>th</sup> day of February 2022.

28

1 LLOYD BAKER INJURY ATTORNEYS  
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7

8 /s/ Andrew Barton  
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