

TAXICAB AUTHORITY

BOARD MEETING

AND

PUBLIC HEARING

WEDNESDAY, MARCH 16, 2022, 9:30 A.M.

AT THE NEVADA STATE BUSINESS CENTER

3300 W. SAHARA AVE.

SUITE 400, NEVADA ROOM

LAS VEGAS, NV 89102

OR

Join the meeting using Microsoft TEAMS

Join on your computer or mobile app

[Click here to join the meeting](#)

Join with a video conferencing device

192425125@teams.bjn.vc

Video Conference ID: 119 816 908 6

Alternate VTC instructions

Or call in (audio only)

+1 775-321-6111,,576576390# United States, Reno

Phone Conference ID: 576 576 390#

Find a local number | Reset PIN

NEVADA TAXICAB AUTHORITY

Department of Business and Industry

Steve F. Sisolak, Governor
Terry Reynolds, Director
JD Decker, Interim Administrator



Dan R. Reaser, Chairman
Roger C. Thompson PhD, Vice Chairman
JD Decker, Member
Cindy M. Rodriguez, Member
Don Soderberg, Member

Date and Time of Meeting: **Wednesday, March 16, 2022**
9:30 a.m.

Place of Meeting: **Nevada State Business Center**
3300 W. Sahara Avenue, Suite 400 Nevada Room
Las Vegas, Nevada 89102

OR

Microsoft Teams meeting
Join on your computer or mobile app
[Click here to join the meeting](#)
Join with a video conferencing device
192425125@teams.bjn.vc

Video Conference ID: 119 816 908 6

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Or call in (audio only)

[+1 775-321-6111,,576576390#](#) United States, Reno

Phone Conference ID: 576 576 390#

[Find a local number](#) | [Reset PIN](#)

This meeting has been properly noticed and posted at the following locations:

- *State of Nevada Taxicab Authority, 2090 E. Flamingo Road, Suite 200, Las Vegas, NV 89119*
- *Las Vegas City Hall, 495 S. Main Street, Las Vegas, NV 89101*
- *Clark County Commissioners, 500 S. Grand Central Parkway, Las Vegas, NV 89101*
- *Grant Sawyer Building, 555 E. Washington Avenue, Las Vegas, NV 89101*
- *Nevada Taxicab Authority Website www.taxi.state.nv.us*
- *State of Nevada Website <https://notice.nv.gov>*

The State of Nevada Taxicab Authority is pleased to make reasonable accommodations for members of the public who are disabled and wish to attend the meeting. If special arrangements for the meeting are necessary, please notify the State of Nevada Taxicab Authority, in writing, at 2090 E. Flamingo Road, Suite 200, Las Vegas, Nevada 89119 or by calling (702) 668-4000 at least 24 hours prior to the date of the meeting.

Members of the public may request the supporting material for this meeting from:

Nancy Moran, Nevada Taxicab Authority, 2090 E. Flamingo Road, Suite 200, Las Vegas, Nevada 89119, (702) 668-4022, email: nmoran@taxi.state.nv.us

In accordance with Nevada's Open Meeting Law, the Authority may consider agenda items taken out of order. The Authority may combine two or more agenda items for consideration. The Authority may remove an item from the agenda or delay discussion relating to an item on the agenda at any time. The Authority may continue the meeting as deemed necessary. The Authority, at its discretion, may take public comment during times other than the designated Public Comment agenda items. The Authority reserves the right to limit public comment to three minutes. Comment may not be restricted based on viewpoint. Prior to the commencement and conclusion of a contested case or a quasi-judicial proceeding that may affect the due process rights of an individual, the board may refuse to consider public comment. See NRS 233B.126.



Board Meeting and Public Hearing

March 16, 2022

Persons wishing to intervene must file the appropriate pleading in accordance with the procedures of N.A.C. 706.894, and serve their petitions to intervene on all appropriate persons, pursuant to N.A.C. 706.921, no later than **Wednesday, March 9, 2022 at 1:00 P.M.** Pursuant to NRS 241.030(1), the State of Nevada Taxicab Authority may conduct a closed meeting to consider the character, allegations of misconduct, professional competence, or physical and mental health of a person. Please be advised that the Authority may discuss or reference applicable governing statutes and regulations during deliberation and action of any of the agenda items, including but not limited to, NRS Chapter 706 and NAC Chapter 706.

ALL CELLULAR TELEPHONES AND PAGERS ARE TO BE TURNED OFF OR SET TO SILENT NOTIFICATION MODE DURING THE PROCEEDINGS.



AGENDA

1. Open Meeting

- A. Call to Order
- B. Pledge of Allegiance
- C. Compliance with Open Meeting Law

2. Public Comment

Members of the public must identify themselves for the record and are then invited to use three minutes to comment on items on the meeting agenda or on items not contained therein. Comments shall be directed to the Board and presented in a professional demeanor and not in a threatening, profane, vulgar, or abusive manner. *The Board may limit repetitive comments to balance time constraints.

*NRS 203.090 Disturbing meeting. Every person who, without authority of law, shall willfully disturb an assembly or meeting not unlawful in its character, shall be guilty of a misdemeanor.

3. Interview of Applicants for the Taxicab Administrator Position (For Discussion and Possible Action)

- 9:30 am to 10:00 am Marilyn Rivera
- 10:00 am to 10:30 am Robert Ljungquist Jr.
- 10:30 am to 11:00 am Karl W. Armstrong

4. Board deliberation and selection of applicants to be submitted to the Director of Business and Industry pursuant to NRS 706.882(1) (For Discussion and Possible Action)

5. Applicants' Petition for Appeal Pursuant to NAC 706.975 from the Order Denying Independent Cab, LLC's Eight Applications Seeking Subpoenas to Produce Documents Pursuant to NAC 706.936, regarding 'an application for a certificate of public convenience and necessity' by applicants Brent Carson and Claudia Hoepfner (Independent Cab Company, LLC), and request for thirty-five taxicab medallions (For Discussion and Possible action)

6. Industry Discussion (For Discussion Only)

7. Staff Report (For Discussion only)

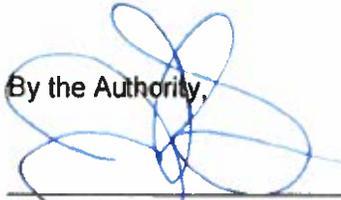
- A. Administrator's Report
- B. Chief Investigator's Report
- C. Stats
- D. Legal Counsel
- E. Future Agenda Items

8. Public Comment



Board Meeting and Public Hearing
March 16, 2022

9. Adjournment – (Action)

By the Authority,


JD Decker, Interim Administrator
Nevada Taxicab Authority

Dated: March 4, 2022
Las Vegas, Nevada



Dan R. Reaser, Chairman
Nevada Taxicab Authority Board

Dated: March 4, 2022
Las Vegas, Nevada



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AGENDA ITEM 1

Open Meeting

- A. Call to Order
 - B. Pledge of Allegiance
 - C. Compliance with Open Meeting Law
-
-

NEVADA TAXICAB AUTHORITY
Department of Business and Industry

Steve F. Sisolak, Governor
Terry Reynolds, Director
JD Decker, Interim Administrator



Dan R. Reaser, Chairman
Roger C. Thompson PhD, Vice Chair
JD Decker, Member
Cindy M. Rodriguez, Member
Don Soderberg, Member

COMPLIANCE OF POSTING

I hereby certify that I have, this day, faxed/posted the ***Notice of Agenda for the Board Meeting and Public Hearing*** scheduled for ***Wednesday, March 16, 2022, at 9:30 a.m.*** This Board Meeting and Public Hearing will be held in the:

**Nevada State Business Center
3300 W. Sahara Avenue, Suite 400, Nevada Room
Las Vegas, Nevada 89102**

OR

Join the meeting using WebEx link

<https://businessnv2.webex.com/businessnv2/j.php?MTID=m6d750cdb15998cee8ffd632699471f2d>

Meeting number: 2499 655 0363
Password: RRtYsNqe538

Join by video system

Dial 24996550363@businessnv2.webex.com
You can also dial 173.243.2.68 and enter your meeting number.

Join by phone

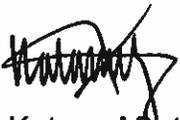
1-844-621-3956 United States Toll Free
Access code: 249 965 50363

This meeting has been properly noticed and posted at the following locations:

- *State of Nevada Taxicab Authority - 2090 E. Flamingo Road, Suite 200 Las Vegas, Nevada 89119*
- *Las Vegas City Hall - 495 S. Main Street Las Vegas, Nevada 89101*
- *Clark County Commissioners - 500 S. Grand Central Parkway Las Vegas, Nevada 89101*
- *Grant Sawyer Building - 555 E. Washington Avenue Las Vegas, Nevada 89101*
- *Nevada Taxicab Authority Website www.taxi.state.nv.us*
- *State of Nevada Website <https://notice.nv.gov>*



Dated in Las Vegas, Nevada this 3rd day of March 2022.



Katana Martinez
Management Analyst II



NEVADA TAXICAB AUTHORITY
Department of Business and Industry

Steve F. Sisolak, Governor
Terry Reynolds, Director
JD Decker, Interim Administrator



Dan R. Reaser, Chairman
Roger C. Thompson PhD, Vice Chair
Cindy M. Rodriguez, Member
Don Soderberg, Member

POSTING CONFIRMATION RECEIPT

This certifies that the attached *Notice of the Agenda for the Board Meeting and Public Hearing* scheduled for **Wednesday, March 16, 2022 at 9:30 a.m.**, has been properly posted at the following location:

STATE OF NEVADA TAXICAB AUTHORITY
2090 E. Flamingo Road, Suite 200
Las Vegas, Nevada 89119

Signature: 
Date: 3/31/2022



MAR/03/2022/THU 02:10 PM

FAX No.

P. 001/001

702 6684008

Nevada Taxicab Authority

02:01:12 p.m. 03-03-2022

2 / 6

NEVADA TAXICAB AUTHORITY
Department of Business and Industry

Steve F. Sisolak, Governor
Terry Reynolds, Director
JD Decker, Interim Administrator



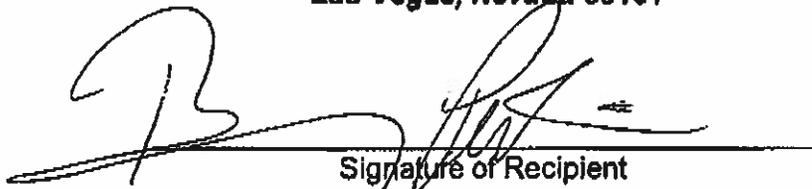
Dan R. Reaser, Chairman
Roger C. Thompson PhD, Vice Chair
JD Decker, Member
Cindy M. Rodriguez, Member
Don Soderberg, Member

POSTING CONFIRMATION RECEIPT

This certifies that the attached *Notice of the Agenda for the Board Meeting and Public Hearing* scheduled for *Wednesday, March 16, 2022 at 9:30 a.m.*, has been appropriately posted at the following location:

LAS VEGAS CITY HALL
495 South Main Street
Las Vegas, Nevada 89101

RECEIVED
CITY CLERK
MAR - 3 P 2:09



Signature of Recipient

3-3-2022
Date Posted

Please fax this posting confirmation back to:

702-668-4008

Attn: Katana Martinez

Or email to

kamartinez@taxi.state.nv.us



From: IT OPERATIONS

702 471 1346

03/03/2022 15:01

#306 P.001/001

702 6684008

Nevada Taxicab Authority

02:05:56 p.m.

03-03-2022

2 / 6

NEVADA TAXICAB AUTHORITY
Dept of Business and Industry

Steve F. Sisolak, Governor
Terry Reynolds, Director
JD Decker, Interim Administrator



Dan R. Reaser, Chairman
Roger C. Thompson PhD, Vice Chair
JD Decker, Member
Cindy M. Rodriguez, Member
Don Soderberg, Member

POSTING CONFIRMATION RECEIPT

This certifies that the attached *Notice of the Agenda for the Board Meeting and Public Hearing* scheduled for *Wednesday, March 16, 2022 at 9:30 a.m.*, has been appropriately posted at the following location:

CLARK COUNTY GOVERNMENT BUILDING

500 S. Grand Central Parkway

Las Vegas, Nevada 89155

CBawoni

Signature of Recipient

3/3/22

Date Posted

Please fax this posting confirmation back to:

702-668-4008

Attn: Katana Martinez

Or email to

kamartinez@taxi.state.nv.us



03-11-22;08:27AM;

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702 6684008

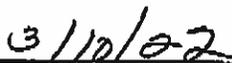
Nevada Taxicab Authority

03:07:21 p.m. 03-10-2022

2 / 6

NEVADA TAXICAB AUTHORITY
Dept of Business and IndustrySteve F. Sisolak, Governor
Terry Reynolds, Director
JD Decker, Interim AdministratorDan R. Reaser, Chairman
Roger C. Thompson PhD, Vice Chair
JD Decker, Member
Cindy M. Rodriguez, Member
Don Soderberg, Member**POSTING CONFIRMATION RECEIPT**

This certifies that the attached *Notice of the Agenda for the Board Meeting and Public Hearing* scheduled for *Wednesday, March 16, 2022 at 9:30 a.m.*, has been appropriately posted at the following location:

GRANT SAWYER BUILDING**555 E. Washington Avenue****Las Vegas, NV 89101**_____
Signature of Recipient_____
Date Posted

Please fax this posting confirmation back to:

702-668-4008

Attn: Katana Martinez

Or email to

kamartinez@taxi.state.nv.us

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AGENDA ITEM 2

Public Comment

3

AGENDA ITEM 3

Interview of Applicants for the Taxicab Administrator Position

(For Discussion and Possible Action)

9:30 am to 10:00 am	Marilynn Rivera
10:00 am to 10:30 am	Robert Ljungquist Jr.
10:30 am to 11:00 am	Karl W. Armstrong

MARILYNN RIVERA

Dear Hiring Manager,

Thank you for taking the time to review my qualifications and consideration for the Division Administrator, Taxicab Authority position. I reviewed the position qualifications on the State of Nevada website (hr.nv.gov).

I consider myself to be a diverse professional with experience in administrative and operational management, security, criminal justice, leadership, interpreting, training, developing, and incorporating federal, state and local security policy and programs for the improvement of enforcement, investigation, inspection, and regulatory compliance has brought significant contributions to drive organizational success.

My broad-based background has provided me with excellent people and communication skills necessary to succeed in a fast-paced industry. I am adept at working closely with professionals to coordinate work processes and procedures. I possess the ability to cultivate and establish harmonious business relationships with colleagues, management, and other stakeholders to maintain operational efficiency and drive organizational productivity.

Throughout my career, I have acquired a diverse skill set essential to cope up with the rapidly changing environments. In addition to that I possess well-honed strategic decision-making skills which I have demonstrated within the areas of risk management, cause, and results mitigation techniques in executing threat assessments and determining best deployment methodologies. Moreover, I am recognized for accomplishing tasks at hand within the specified time frames and with optimal results. These experiences vouch for my work ethic and dedication to provide excellent analytical and leadership skills the best service I could render to any agency.

Thank you for your time and consideration.

Sincerely,

Marilynn Rivera

Marilynn Rivera

MARILYNN RIVERA

QUALIFICATIONS PROFILE

Goal-driven and highly analytical professional, comprehensive experience in operations, administration, interpreting, developing, and incorporating policy and programs to enhance leadership, enforcement, investigation, inspection, and compliance. Adept at ensuring the accuracy of information to secure high-quality and precise work results.

SOL TRANSPORTATION, INC

PROFESSIONAL EXPERIENCE

Operations and Quality Assurance Manager

July 2019 - Current

- Manage day-to-day operations for all programs and staff
- Maintain constant communication with executives, staff, and vendors to ensure proper operations of the organization
- Develop, implement, and maintain quality assurance protocols
- Ensure operational activities remain on time and within a defined budget
- Prepare for, participate and manage reporting and correspondence for client audits and review of service and safety standards
- Manage and schedule over 80 transportation drivers, to ensure there was always adequate coverage
- Perform coaching and counseling of staff, to include disciplinary actions of suspension, and/or termination
- Investigate all accidents/ incidents and followed proper reporting procedures
- Track staffing requirements, interviewed and hired new employees; as needed
- Develop and implement internal service improvement plans
- Revised and implemented the Operations Manual and Employee Handbook
- Manage and conduct monthly safety meetings for all staff
- Lead, motivate, and support a large team within a time-sensitive and demanding environment, including setup and implementation of career development plans for all direct reports and problem resolution

SILVERGATE SAN MARCOS RETIREMENT COMMUNITY

Lead Administrative Assistant

Feb 2019 – July 2019

- Act as the first point of contact for all residents, guest, vendors and management
- Answer the phone, direct calls or respond to inquiries
- Completes data entry, filing task, maintain files and file in proper locations
- Update tracking system to include conversations and any updates on residents
- Prepare agendas, updates management reports, and compile documents and copies for resident files
- Assist directors and executives with various task
- Excellent working knowledge of Microsoft Office and Google software

SUTHERLAND GLOBAL SOLUTIONS

Customer Service Representative

July 2018 – Nov 2018

- Provide professional interaction with clients via email, telephone or fax
 - Entered client account information into computer system for client payments, tracking and order tracking
 - Follow up with clients to ensure 100% satisfaction
 - Built relationships with clients
-

MARILYNN RIVERA

- Managed databases for client files
- Worked with Microsoft Office (Word, Excel, Outlook)

WESTGATE RESORT AND CASINO

Security Supervisor

Aug 2017–June 2018

- Supervised over 40 personnel while conducting required security duties throughout the property
- Completed reports on security incidents and criminal activities
- Conducted interviewing
- and investigations on alleged offenses to pass down to local law enforcement
- Performed dispatch duties for emergency and non-emergency calls
- Monitored fire alarm panels and responded appropriately and quickly to any alarms
- Monitored and reviewed CCTV throughout the casino and hotel
- Conducted verbal and/ or written counseling of officers for any disciplinary actions
- Effectively made quick and concise decisions during stressful situations
- Knowledge of Title 31, Gaming Regulations
- Reviewed surveillance footage of incidents and criminal activities

DEPARTMENT OF HOMELAND SECURITY/ TRANSPORTATION SECURITY ADMINISTRATION (TSA)

Policies Security Specialist

Feb 2017–June 2017

- Developed security policies using a risk-based approach and available threat intelligence
- Implemented risk-based, intelligence-driven security initiatives to improve mission effectiveness
- Worked routine assignments and "Priority" projects to completion within the assigned time-frame
- Serve as primary for multiple internal policy initiatives which involves collaboration with other government offices & Senior Leadership
- Increase opportunities for employee engagement and facilitated information sharing

DEPARTMENT OF HOMELAND SECURITY/ TRANSPORTATION SECURITY ADMINISTRATION (TSA)

Program Analyst

June 2016–Feb 2017

- Developed a work plan and schedule for 4 Leadership development programs
- Offered effective team support for upcoming program events, leadership developmental strategic planning, recruitment, and programming
- Overseen overall budgets, curriculum designs, delivery, and evaluation
- Developed financial packages for the programs, which involved numerous financial spreadsheets for approval from the Chief Financial Officer
- Assisted in developing an Administrator's council, representing 18 various government offices
- Closely collaborated with program manager in arranging a Structured Telephone Interview Program, to interview a total of 52 personnel
- Established internal briefings for senior leadership on selection procedures for leadership programs

Department of Homeland Security/ Transportation security Administration (TSA)

Austin Bergstrom International Airport Austin, TX

Regulatory Inspector/ Investigator

Sep 2005–Nov 2016

- Held full accountability in overseeing security compliance of entities under Title 49 Code of Federal Regulations (CFR) Part 1500 series
- Managed the implementation of a screening testing Program

MARILYNN RIVERA

- Initiated a comprehensive work plan to perform inspections of regulated parties to identify overall security posture and compliance in accordance with existing laws, security policies and regulations
- Conducted regulatory inspections and investigations, as well as, initiated criminal investigations of alleged security violations and/or criminal activities
- Wrote enforcement investigative reports on all security violations and criminal activities; identified enforcement action needed; and provided recommendations to senior leadership and counsel
- Collected and analyzed security data/ information from various local, state and federal outside sources
- Administered data evaluation in relation to risk methodology along with established risk profiles for international airports/carriers
- Analyzed inspection and investigative reports; identifying trends and issues of repeated non-compliance.
- Identified gaps to complete assessments or reports and took action to obtain the proper intelligence and data to support security threat assessments
- Supported multiple regulatory field offices throughout the country through inspections, audits, tests, and incident investigations
- Conducted outreaches to promote best security practices to ensure future compliance

**DEPARTMENT OF HOMELAND SECURITY/ TRANSPORTATION SECURITY ADMINISTRATION (TSA)
Fort Myers International Airport (RSW) Fort Myers, FL**

Supervisory Transportation Security Officer

May 2002–Sep 2005

- Supervised over 100 personnel in performing security screening at various airports
- Administered security screening procedures in alignment with TSA objectives
- Regulated the allocation of resources and personnel to support operations and ensure proper assignment with high efficiency and availability of equipment, supplies, and tools necessary to meet organizational needs

UNITED STATES NAVY

NAB Coronado and Point Loma Submarine Base, San Diego, CA

Supervisor | Military Police - Honorable Discharge

Jul 1994–May 2000

- Monitored consistent implementation of local, state, and federal statutes
- Administered investigations which involved various violations and criminal activities
- Secured the confidentiality of information; handled command presence in conflict situations
- Performed duties of a dispatcher and dispatched officers to emergency and non-emergency calls
- Managed and Supervised over 125 employees
- Monitored work performance of employees
- Reported to the Chief Officer and conducted detail briefing for on-going projects

EDUCATION

Oct 2016 **Mason Institute of Leadership Excellence, Graduated**
GEORGE MASON UNIVERSITY FAIRFAX, VA 22030

Aug 2006 **Bachelor's Degree in Criminal Justice**
FLORIDA INTERNATIONAL UNIVERSITY, FORT MYERS, FL 33919

May 2004 **Associate's Degree in Criminal Justice, GPA: 4.0 | Graduated with High Honors**
SOUTHWEST FLORIDA COLLEGE, FORT MYERS, FL 33919

MARILYNN RIVERA

Jun 1993 **High School Diploma, GPA: 3.5**
CHARLOTTE VOCATIONAL HIGH SCHOOL, PORT CHARLOTTE, FL 33954

PROFESSIONAL AFFILIATION

2016–2017 Women Executives at Transportation Security Administration (WE@TSA)

ACTIVITIES

2015 National Security Event at Martha's Vineyard for the, President of the United States

Professional References:

[Redacted]
[Redacted]
[Redacted]

Personal References:

[Redacted]
[Redacted]

ROBERT LJUNGQUIST JR

My goals are to create a working environment where employees feel heard and appreciated for their work. Where employees feel empowered to do the work they were hired for with full confidence that leadership has their back. I want the employees to promote their department through the professional image and service they provide to the public they serve. My duty would be to train and lead my employees, working side by side to complete any and all task set before us.

EXPERIENCE

MARCH 2018 TO PRESENT

DETECTIVE, UNIVERSITY POLICE SERVICES SOUTHERN COMMAND

Currently assigned to the Investigation Section of the University Police Services Southern Command. My duties include investigating crimes which occurs in the jurisdiction of the following schools: College of Southern Nevada, The Desert Research Institute, Nevada State College, and The University of Nevada Las Vegas. I have conducted investigations into motor vehicle accidents, burglaries, robberies, arson, and unattended deaths. In addition to investigating crimes I am assigned to conduct background investigations on both civilian and police applicants. I am a certified on the Voice Stress Analyzer (CVSA) which I complete as needed for new applicants. I have been trained and have been assigned to dignitary protection details working closely with Federal, State, and local protection details. I also assisted with normal uniform patrol duties as needed.

JULY 2009 TO MARCH 2018

DETECTIVE, UNIVERSITY OF NEVADA, LAS VEGAS POLICE SERVICES

Promoted to Detective July of 2009 after serving in the Detective Bureau as an officer from September 2008 to July 2009. During this time I was responsible for investigating any and all crimes which occurred in the jurisdiction of The Desert Research Institute, Nevada State College, and The University of Nevada, Las Vegas.

February 2003 TO July 2009

POLICE OFFICER, UNLV POLICE DEPARTMENT

During this time I was trained and certified for the following: bicycle patrol, Mounted Horse patrol, and motorcycle patrol (enduro motorcycles), and Field Training Officer. Certified as Taser Instructor and Defensive Tactics Instructor. An additional assigned duty during this time included vehicle officer where I was responsible for ordering vehicles, outfitting vehicle with appropriate equipment for patrol operations, and getting vehicles maintained for a 20 plus vehicle fleet. Assigned to research and purchase our new radio communications on the State of Nevada EDACS System from old Ericson radios to the new Harris radios with a budget of \$350,000.

TRAINING/CERTIFICATIONS

ACTIVE STATE OF NEVADA CATEGORY 1 POST CERTIFICATE

NEW MEXICO TECH PER-231 PREVENTION OF AND RESPONSE TO SUICIDE BOMBING INCIDENTS

SEPTEMBER 2001 TO FEBRUARY 2002

LAW ENFORCEMENT TRAINING ACADEMY, COMMUNITY COLLEGE OF SOUTHERN NEVADA

I attended and completed the Law Enforcement Training Academy. I completed 33 credit hours of the academy with a 3.64 GPA. I was awarded with the Top Cop award for my academy class. I completed 3 additional college classes in May 2002 for a total 42 credit hours.

MAY 1990

HIGH SCHOOL DIPLOMA, JAMESVILLE-DEWITT HIGH SCHOOL

Graduated from JD High School, Fayetteville New York

SKILLS

- Knowledge on how effective leaders lead their employees
- Investigation of criminal activity
- Knowledge of patrol operations
- Goal oriented
- Team player
- Leadership- Acting Supervisor during major events
- Eagle Scout

ACTIVITIES

Over the years after high school I have attended college courses to increase my knowledge. I have completed EMT I training and took training for Emergency Management at the College of Southern Nevada. I have completed many of the FEMA NIMS courses and had attended table top exercises using this training. I am active at my church working with local church leadership. I am an Assistant Scout Master in Boy Scouts of America Troop 739 where two of my five boys are working toward their Eagle Scout Rank.

The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that every entry, no matter how small, should be recorded to ensure the integrity of the financial statements. The text also mentions the need for regular audits to verify the accuracy of the data.

In the second section, the author details the various methods used to collect and analyze data. This includes the use of surveys, interviews, and focus groups to gather qualitative information. Quantitative data is collected through structured questionnaires and statistical analysis. The text highlights the importance of using appropriate statistical techniques to interpret the results.

The third part of the document focuses on the challenges faced during the research process. It identifies common issues such as low response rates, data inconsistency, and time constraints. The author provides practical solutions and strategies to overcome these challenges, such as using incentives to encourage participation and implementing strict data management protocols.

Finally, the document concludes with a summary of the findings and their implications. It states that the research has provided valuable insights into the behavior of the study population. The author suggests that these findings can be used to inform policy decisions and improve organizational practices.

The following table presents the key data points from the study. It shows a clear trend in the variables being measured, with a significant increase in the latter part of the period. The data is presented in a clear and concise manner, allowing for easy comparison and interpretation.

Year	Variable A	Variable B	Variable C
2010	12.5	8.3	5.1
2011	15.2	9.7	6.4
2012	18.9	11.5	7.8
2013	22.1	13.2	9.3
2014	25.8	15.1	10.9
2015	29.4	17.3	12.6
2016	33.1	19.8	14.5
2017	37.5	22.4	16.7
2018	41.2	25.1	19.2
2019	45.8	28.3	22.1
2020	50.1	31.7	25.4

The data indicates a steady and consistent growth across all three variables over the ten-year period. This suggests a positive and stable environment for the factors being studied. The correlation between the variables is strong, indicating that they are interconnected and influence each other.

The final section of the document discusses the limitations of the study. It acknowledges that the sample size was limited and that the data was self-reported, which may introduce some bias. However, the author argues that the findings are still valuable and provide a solid foundation for further research.

In conclusion, this study has provided a comprehensive overview of the research process and its findings. It has demonstrated the importance of thorough data collection and analysis in understanding complex phenomena. The results of the study are promising and offer valuable insights into the behavior of the study population.

The author expresses gratitude to the participants and the research team for their dedication and hard work. It is hoped that the findings of this study will be useful to other researchers and practitioners in the field.

The document ends with a list of references and a list of appendices. The references cite the key sources used in the study, while the appendices provide additional information and data.

CURRICULUM VITAE

Name: Karl W. Armstrong

Address: [REDACTED]

Telephone: [REDACTED]

Date of Birth: [REDACTED]

Martial Status: [REDACTED]

Children: [REDACTED]



Employment History:

State of Nevada
Department of Administration
Hearings Division
[REDACTED]

Las Vegas, Nevada 89102

Appeals Officer, July 2016 to Present

Acts as an Administrative Law Judge adjudicating assigned Hearings from the State of Nevada. Primarily adjudicates disputes in the Worker's Compensation arena. The position is appointed by the Governor of the State of Nevada.

Ray Lego & Associates
[REDACTED]

Las Vegas, Nevada 89113

Senior Counsel, June 2004 to June, 2016

Perform duties as staff counsel for Travelers' Insurance Company. I am a senior litigation attorney for the company and practice in the areas of commercial litigation, auto and personal liability defense, as well as Worker's Compensation defense for the company's insureds. My duties consist of the following: participate in arbitrations and mediations; prepare and conduct jury trials when necessary; advise clients on Nevada law requirements; conduct claim seminars and presentations; interface with persons inside and outside the company to provide quality and time efficient legal representation.

Karl Armstrong, Esq.
[REDACTED]

Las Vegas, Nevada 89106

Self-employed, Contract Attorney, November 2003 to June 2004

Independent contractor who performed legal research and trial preparation services for a number of legal offices. Provided legal consulting services in the areas of personal injury, employment, contract, medical malpractice and criminal law. Conducted legal research using both LEXIS and WESTLAW. Drafted motions, pleadings and other documents as required. Performed mediation, arbitration and trial preparation.

**Karl Armstrong and Associates
Sharon Gwin Immerman & Associates
State Farm Staff Counsel Office**

Las Vegas, Nevada

Attorney/Interim Managing Attorney, February 2001 to September 2003

Hired as a senior staff attorney and then appointed Interim Managing Attorney for in-house insurance defense firm representing State Farm Insureds.

As senior staff attorney worked in the areas of automobile and homeowners insurance defense. Duties consisted of: participating in arbitrations and mediations; preparing and prosecuting jury trials when necessary; advising clients on Nevada law requirements; conducting claim seminars and presentations; interfacing with persons inside and outside the company to provide quality and time efficient legal representation.

After appointment to Interim Managing Attorney, duties included supervision of four staff attorneys, two paralegals, three legal secretaries and a receptionist. Counseled employees on employment and performance issues. Adhered to company policies concerning employee discipline. Approved all time sheets and leave requests for all employees. Conducted continuing education and employment seminars for employees. Managed office workflow and work quality issues. Approved all requisitions, purchase orders and requests for payment. In addition, managed an active litigation caseload of 50 automobile and homeowners cases.

**University and Community College System of Nevada
(Now known as Nevada System of Higher Education)**

Las Vegas, Nevada 89103

Assistant General Counsel, February 1997 to January 2001

Member of a five person legal staff that was responsible for representation on all legal matters of the institutions that comprise the Nevada Public Higher Education System. These institutions included: The Desert Research Institute; University of Nevada Las Vegas; University of Nevada Reno; Community College of Southern Nevada; Western Nevada Community College; Truckee Meadows Community College; and Great Basin Community College. Represented the entire system on several advisory committees i.e. computer use and student disciplinary code of conduct. Provided representation to the Chancellor's Office as well as the Board of Regents in litigated matters. The areas of practice included: civil litigation; employment and personnel matters; contract review and interpretation; construction law and intellectual property. In addition to the above duties, managed an active litigation caseload of between 20 and 30 cases. Trial counsel on six matters that went to jury verdict in both federal and state court.

Office of the Attorney General, State of Nevada

████████████████████
Las Vegas, Nevada 89101

Deputy Attorney General, November 1993 to February 1997

Primary legal advisor to The Nevada Department of Prisons, The Nevada Parole Board and The Nevada Department of Parole and Probation. Responsible for contract review, personnel matters, policy implementation and litigation defense. Lead prosecutor in the Worker's Compensation Fraud Unit. Supervision of the Worker's Compensation Fraud Unit in Las Vegas and select cases for prosecution. Interact with public and business leaders regarding the Worker's Compensation Fraud Unit's public education efforts. Prepare and argue post conviction and Habeas Corpus Petition replies on behalf of the State of Nevada. Argued two cases with published opinions before the Ninth Circuit Court of Appeals. Lead trial counsel on three matters that went to jury verdict in federal court. Handled all aspects of litigation in the following areas on behalf of the State of Nevada: inmate civil rights; 1st, 8th and 14th Amendment; excessive force; failure to protect; medical deliberate indifference and medical and dental malpractice.

**Eighth Judicial District Court
The Honorable Sally L. Loehrer**

████████████████████
Las Vegas, Nevada 89155

Law Clerk, January 1993 to August 1993

Prepared case summaries on all pending matters. Briefed judge on all criminal and civil cases. Reviewed orders submitted by counsel for accuracy and form. Performed legal research as directed using WESTLAW and printed legal materials. Drafted for judge's review decisions on cases argued before

the bench. Interacted with legal community as necessary regarding cases before the Court.

**Eighth Judicial District Court
The Honorable Addelmar D. Guy, III**

**Las Vegas, Nevada 89155
Law Clerk, August 1991 to December 1992**

Prepared case summaries on all pending matters. Briefed judge on all criminal and civil cases. Reviewed orders submitted by counsel for accuracy and form. Performed legal research as directed using WESTLAW and printed legal materials. Drafted for judge's review decisions on cases argued before the bench. Interacted with legal community as necessary regarding cases before the Court.

Office of the Cook County Public Defender

**Chicago, Illinois
Assistant Public Defender, June 1988 to August 1991**

Began tenure in the Post Conviction Unit, which represented indigent defendants in investigating and filing post conviction petitions. Position involved reviewing the record and researching criminal issues to argue before the court to determine whether there was a basis to overturn a defendant's conviction. Subsequently posted to the Juvenile Division. Represented parents of abused and neglected children in juvenile court. Duties included: preparing protective orders; representation at termination of rights proceedings and custody determination hearings. Last posted to the 6th Judicial District Court in Markham, Illinois. Provided legal representation in felony and misdemeanor matters for indigent accused. Lead trial counsel on ten matters that went to jury verdict in state court.

Education:

Lindblom Technical High School

**Chicago, Illinois
1972 to 1976, High School Diploma with Honors, Top 5% of Class**

**Northwestern University
Evanston, Illinois
1976 to 1980, No degree conferred**

**University of Illinois at Chicago
Chicago, Illinois
1981 to 1985, Bachelor of Arts in Criminal Justice**

**University of Iowa College of Law
Iowa City, Iowa
Juris Doctor, May 1988, Top one half, C+/B- Average**

Significant High school, College and Law School activities:

Lindblom High School

- Lindblom Honor Society, 1972 to 1976
- Junior Achievement (President of four companies), 1972 to 1976
- President, Caduceus Club, 1973 to 1974
- Student Government, Member, 1973 to 1976
- Junior Achievement, Student Speaker, "Future Unlimited" Banquet, 1974
- Junior Achievement, Finalist – President of the Year, 1974
- Junior Achievement Leadership Award, 1974
- President, German Club, 1975 to 1976
- National Honor Society, 1975 to 1976
- National Achievement Scholarship Semifinalist, 1975 to 1976
- School Science Fair, Winner, 1976
- Senior Brothers Council, Member, 1976
- Recipient, Lindblom Leadership Scholarship, 1976
- Recipient, Top 10 outstanding Seniors Award, 1976
- Managing Editor, Lindblom Leader Newspaper, 1975 to 1976

Northwestern University

- Treasurer, For Members Only, 1978 to 1979
- Chair, Student Activities Funding Board, 1978 to 1979
- Treasurer, Associated Student Government, 1978 to 1980
- Member, Student Activities Funding Board, 1977 to 1980

University of Illinois at Chicago

- Vice Chair, Chicago Circle Center Board, 1984 to 1985
- Treasurer, Student Government, 1982 to 1984
- Chair, Recreation Committee, Chicago Circle Center Board, 1983 to 1984

University of Iowa College of Law

- Member, Black Law Students Association, 1985 to 1988,
- Vice President, Black Law Students Association, 1986 to 1987
- Semifinalist, Van Oosterhout Memorial Moot Court Competition, 1986 to 1987

- Staff Member, Volume 12 of *The Journal of Corporation Law*, 1986 to 1987
- Managing Editor, Volume 13 of *The Journal of Corporation Law*, 1987 to 1988

Bar Admittance:

State of Nevada, 1993
 U.S. District Court of Nevada, 1993
 9th Circuit Court of Appeals, 1993
 Illinois State Courts, 1989

Boards and Commissions:

- Nevada Commission on Judicial Discipline
Commissioner, 2001-Present
 Appointed by the State Bar of Nevada to serve as one of two attorney members of this constitutionally established commission that has exclusive jurisdiction over conduct of all state judicial officers as defined in the Canons of Judicial Ethics. Also enforces these canons of ethics. Sits as a court of judicial discipline in deciding whether to impose discipline on judicial officers alleged to have violated the canons of judicial conduct.
- Standing Committee on Judicial Ethics and Election Standards
Member, 2000-2001
 Committee established by the Supreme Court to resolve ethical disputes between judges and judicial candidates during campaign season and also to render advisory opinions regarding the application of the Canons of Judicial Conduct to specific questions posed by members of the judiciary, judicial candidates, and the general public.
- FAME Transportation, Inc.
Member, Board of Directors and Legal Counsel, 2004-2008
 Nonprofit organization providing transportation services to the handicapped and elderly throughout Clark County. The organization is a subsidiary of the First African Methodist Episcopal Church.
- Southern Nevada Disciplinary Board,
Member, 1993-2002, 2010-2014
 Appointed by the State Bar of Nevada to serve as a member of the panel that screens and hears disciplinary cases against attorneys. This panel is charged with the responsibility for hearing cases involving lawyer violations of the Code of Professional Conduct. The panel conducted disciplinary hearings and made recommendations to the Nevada Supreme Court regarding attorney disciplinary matters.

- **Las Vegas Chapter of the National Bar Association
*Vice President, 1995-1996; Treasurer, 2011-2013***
- **State Bar of Nevada
*Member, Public Lawyer's Section, 1994 to 1996***
- **Big Brothers Big Sisters of Nevada
*Member, Board of Directors, 1998-2002***
- **Boulder Dam Area Council, Boy Scouts of America
*Member, Board of Directors, 1994 to 1996***

Chairman, Easter Seals Nevada 2009-2013

Member, Board of Directors, Easter Seals Southern Nevada 2008-2020

Member, Easter Seals National Board of Directors 2018-2019

Member, 100 Black Men of Las Vegas, 2012-2013

Honors and Awards:

Outstanding Young Men of America

Martindale Hubbell BV Rating

Who's Who Among Students in Colleges and Universities

University of Illinois at Chicago Alumni Association Student Leadership Award

Jury Trial Statistics:

- **Ten criminal jury trials to verdict**
- **Two juvenile adjudicatory trial proceedings**
- **Ten civil jury trials to verdict**
- **Three preliminary Injunction hearings with full evidentiary presentations**
- **Two 9th Circuit Appellate cases with published opinions**
 - ***Walker v. Deeds*, (50 F.3d 670)**
 - ***Riley v. Deeds*, (56 F.3d 1117)**

4

AGENDA ITEM 4

Board deliberation and selection of applicants to be submitted to the Director of Business and Industry pursuant to NRS 706.882(1)

(For Discussion and possible action)

5

AGENDA ITEM 5

Applicants' Petition for Appeal Pursuant to NAC 706.975 from the Order Denying Independent Cab, LLC's Eight Applications Seeking Subpoenas to Produce Documents Pursuant to NAC 706.936, regarding 'an application for a certificate of public convenience and necessity' by applicants Brent Carson and Claudia Hoepfner (Independent Cab Company, LLC), and request for thirty-five taxicab medallions

(For Discussion and Possible Action)

INTERVENER

Desert Cab Inc.

PREVIOUS PLEADINGS REGARDING THIS MATTER

RELEVANT NEVADA ADMINISTRATIVE CODES

1 Robert A. Winner, Esq.
Nevada Bar No. 5167
2 **ROBERT WINNER, LTD.**
400 S. Fourth Street, 3rd Floor
3 Las Vegas, Nevada 89101
4 raw@winnerlawltd.com
(702) 791-0308
5 *Attorney for Desert Cab, Inc.*

6 **BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY**

7 IN THE MATTER OF AN APPLICATION
8 FOR A CERTIFICATE OF PUBLIC
9 CONVENIENCE AND NECESSITY BY
10 APPLICANTS BRENT CARSON AND
11 CLAUDIA MARIA HOEPPNER
(INDEPENDENT CAB COMPANY, LLC),
AND REQUEST FOR THIRTY-FIVE
TAXICAB MEDALLIONS.

12 **DESERT CAB, INC.'S PETITION TO INTERVENE**

13 DESERT CAB, INC. d/b/a DESERT CAB COMPANY hereby petitions the Nevada Taxicab
14 Authority of the State of Nevada, pursuant to NRS 706.8819 to 706.8824, and NAC 706.894 for
leave to intervene and join in the above-entitled matter, on the following grounds:

- 15 1. Petitioner is and was, at all times relevant herein, a Nevada corporation, in good standing
16 and operating and doing business in Clark County, Nevada.
17 2. The address of Petitioner to which all correspondence and pleadings should be sent is as
18 follows:

19 George Balaban, President
Desert Cab Company
20 4675 Wynn Road
Las Vegas, Nevada 89103

21
22 Robert A. Winner, Esq.
ROBERT WINNER, LTD.
23 400 S. 4th Street, 3rd Floor
Las Vegas, Nevada 89101
24

- 25 3. Petitioner is a common motor carrier holding a Certificate of Public Convenience and
26 Necessity (887) issued by the Taxicab Authority for the State of Nevada, authorizing it to
27 transport passengers and their baggage in taxicab service between all points and places in
28 Clark County, Nevada. Petitioner is the owner and holder of taxicab medallions duly
issued by the Taxicab Authority for this purpose. As applicant seeks to operate taxi
service in the same territory as Desert Cab operates, Desert Cab has an economic interest
and therefore a direct and substantial interest in this application.

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4. Petitioner therefore requests that it be permitted to intervene and join in this proceeding (Agenda) scheduled for March 16, 2022; specifically, Item Number 5, and that it be served with copies of any and all pleadings, notices, papers, and exhibits that have been or may be filed in this matter, as they may want to oppose.

5. Desert Cab Company would like to participate in the discussion and possible action concerning Applicants' Petition for Appeal pursuant to NAC 706.975 from the Order Denying Independent Cab, LLC's Eight Applications Seeking Subpoenas to Produce Documents Pursuant to NAC 706.936, regarding an application for a certificate of public convenience and necessity by applicants Brent Carson and Claudia Hoepfner (Independent Cab, LLC), and for thirty-five taxicab medallions.

THEREFORE, DESERT CAB, INC., d/b/a DESERT CAB COMPANY, hereby requests relief as follows:

1. Permission to intervene and participate fully in any public hearing (Agenda) with respect to this matter, including the right to offer evidence of any kind, to examine and cross examine witnesses and to make arguments and file briefs, as well as participate in all other aspects of this matter.

2. For such other relief as appears just and proper in the premises.

DATED this 9th day of March, 2022.

ROBERT WINNER, LTD.

/s/Robert A. Winner

ROBERT A. WINNER, ESQ.
Nevada Bar No. 5167
4675 Wynn Road
Las Vegas, Nevada 89103
Attorney for Desert Cab, Inc.

1 **CERTIFICATE OF SERVICE BY EMAIL**

2 The foregoing **DESERT CAB, INC.'S PETITION TO INTERVENE**, was served by email
3 on this 9th day of March, 2022, to the following:
4

5 George Balaban
6 DESERT CAB COMPANY
7 4675 Wynn Road
8 Las Vegas, NV 89103
9 gtbalaban@aol.com

Jason A. Awad, Esq.
LUCKY CAB COMPANY
10801 W. Charleston Blvd., Ste 575
Las Vegas, NV 89135
Jason@jasonawad.com

8 Jamie Pino
9 NELLIS CAB COMPANY
10 3564 W. Naples Drive
11 Las Vegas, NV 89103-5607
12 nelliscab@aol.com

Keith Gibson, Esq.
YELLOW/CHECKER/STAR COMPANIES
5225 W. Post Road
Las Vegas, Nevada 89118
kgibson@taximanagement.vegas

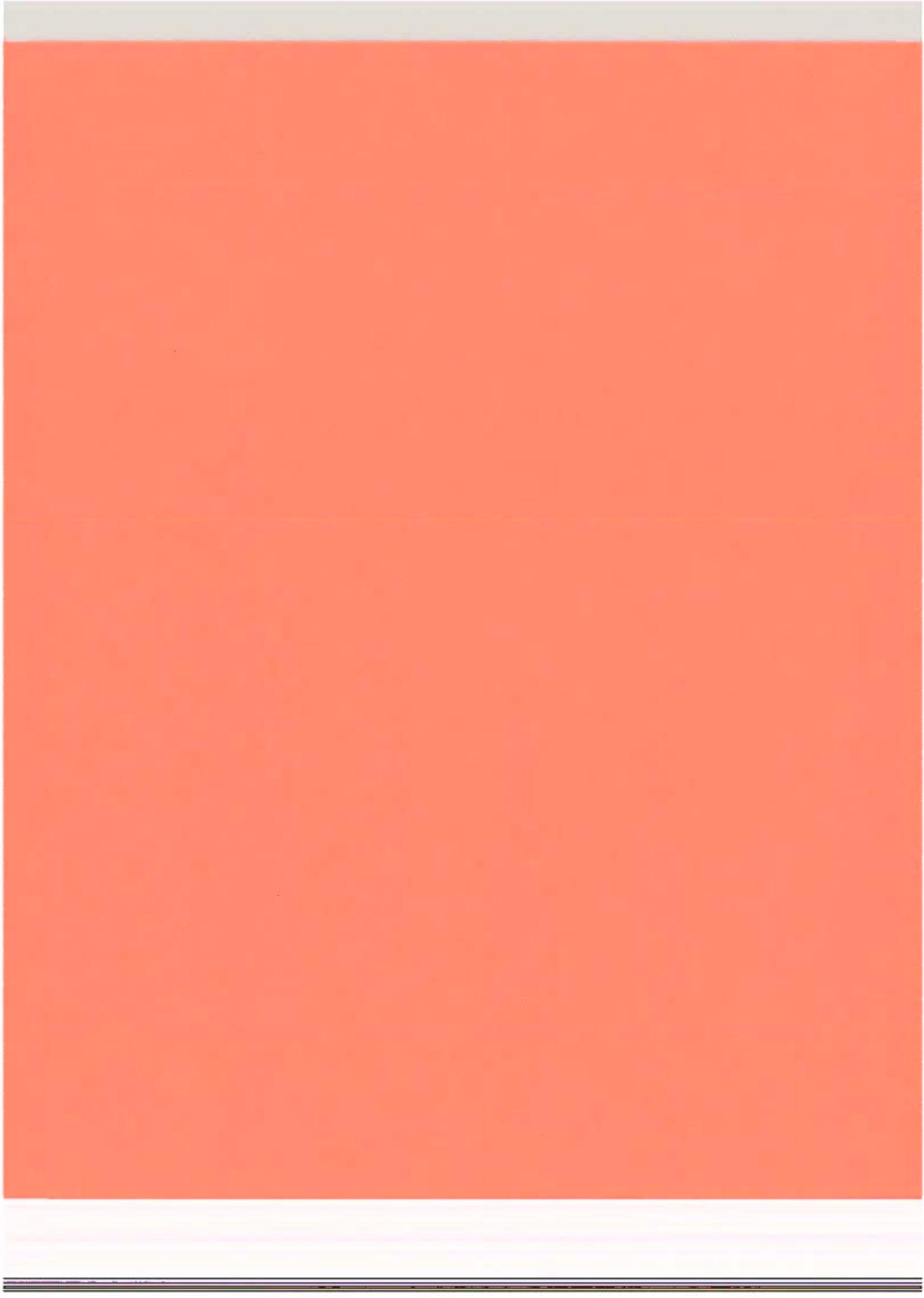
11 Brent A. Carson, Esq.
12 Attorney Brent Carson, LLC
13 7935 W. Sahara Ave. #101
14 Las Vegas, Nevada 89117
bac@winnercarson.com

Independent Cab Inc.
ATTN: Claudia Hoeppe & Brent Carson
2383 Green Mountain Court
Las Vegas, Nevada 89135
(served via U.S. Mail)

15 Mark Trafton, Esq.
16 WHITTLESEA BLUE/HENDERSON TAXI
17 1910 Industrial Road
18 Las Vegas, NV 89102
mark@belltransportation.com

19
20 */s/Dawn Stanfill*

21 _____
22 Dawn Stanfill, Paralegal
23 ROBERT WINNER, LTD.
24
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1 BRENT A. CARSON, ESQ.
2 Nevada Bar No. 5903
3 ATTORNEY BRENT CARSON, LLC.
4 bac@winnercarson.com
5 7935 W. Sahara Avenue, Suite 101
6 Las Vegas, Nevada 89117
7 Ph: (702) 471-1111
8 Fax: (702) 471-0110

9 Attorney for Applicant,
10 INDEPENDENT CAB COMPANY, LLC

50311229100

11
12 **BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY**

13 In the matter of An Application for a certificate)
14 of Public Convenience and Necessity by)
15 Applicants, Brent A. Carson and Claudia Maria)
16 Hoepfner (Independent Cab Company, LLC),)
17 And Request for Thirty-Five Taxicab)
18 Medallions.)

19 **APPLICANTS' PETITION FOR APPEAL PURSUANT TO NAC 706.975 FROM THE**
20 **ORDER DENYING INDEPENDENT CAB, LLC'S EIGHT (8) APPLICATIONS SEEKING**
21 **SUBPOENAS TO PRODUCE DOCUMENTS PURSUANT TO NAC 706.936**

22 COMES NOW, Applicants BRENT A. CARSON and CLAUDIA MARIA HOEPPNER, by
23 and through their attorney of record, Brent A. Carson, Esq. of the law firm of ATTORNEY BRENT
24 CARSON, LLC., hereby Petitions to appeal the Order Denying Applications for Subpoenas dated
25 January 19, 2022.. (See, Exhibit 1, Order dated January 19, 2022)

26 **I.**

27 **INTRODUCTION:**

28 **1. Brief Statement of Facts:**

On September 7, 2021, Hearing Officer David Cassetty issued his Findings of Fact, Conclusions
of Law and Order following the August 23, 2021 Prehearing Conference.

Paragraph 23 under the section "Findings of Fact," and paragraph 5 of the "Order," states that the
Applicant may serve interrogatories on the intervenors. On October 12, 2021, Applicant prepared

1 and served Interrogatories on all Intervenors. Applicant received unverified, non-responses to a
2 majority of these Interrogatories from the Intervenors. Applicant did not receive a timely response
3 from Yellow, Checker and Star Cab Companies, and received no response to the interrogatories from
4 Nellis Cab.

5 The September 7, 2021 Order also contained paragraph 22, which references a “November 22,
6 2021 filing deadlines.” Applicant, based on the belief that this date was the “discovery deadline”
7 and based on the various non-responses, filed Motions in Limine against Desert Cab,
8 Henderson/Whittlesea, Western/Lucky and Motions to Strike the Petitions to Intervene against
9 Yellow/Checker/Star and Nellis Cab, because they failed to “appropriately serve any proposed
10 evidence by November 22, 2021.”

11 On December 22, 2021, Hearing Officer, David Cassetty, conducted the prehearing conference.
12 At issue were the Applicants’ Motions in Limine, Motions to Strike and Intervenor’s Motion to
13 Compel. The original application hearing date was set for January 5, 2022. However, during the
14 prehearing conference, Mr. Cassetty informed the parties that the January hearing date was be
15 continued.

16 Therefore, Applicants’ Motions in Limine and Motions to Strike were treated as Motions to
17 Compel Discovery. At the prehearing conference, Applicants argued that the November 22, 2021
18 date was a discovery deadline and that the Intervenor’s failed to produce certain documents by that
19 date and therefore, inadmissible at the upcoming hearing. Hearing Officer Cassetty disagreed with
20 my interpretation of the November 22, 2021 deadline. He specifically stated that November 22,
21 2021 was NOT a discovery cut-off date.

22 The Hearing Officer then Ordered the Intervenors to amend their answers to Applicant’s
23 interrogatories by January 3, 2022. (See Exhibit 2, Order dated 12/23/2021) Unfortunately, due to
24 technical issues, there is no recording of the December 22 prehearing conference. The Hearing
25 Officer then stated that based on the amended answers, Applicant could file Applications for
26 Subpoenas with the Administrator pursuant to NAC 706.936.

27 Intervenors’ filed their amended answers to Applicant’s interrogatories and Applicant filed
28 Applications for Subpoenas. Applicants’ Subpoena requests were denied by Chair Reaser because

1 they were submitted "after the discovery cut-off date (November 22, 2021)" This is completely
2 contrary to Mr. Cassetty's representations at the December 22, 2021 prehearing conference that the
3 November 22, 2021 date was not a discovery cut-off deadline.

4 Upon receipt of the Order denying Applicants' request for subpoenas and since the December
5 22, 2021 was not recorded, Applicant requested a discovery conference call. Mr. Cassetty held the
6 discovery conference call on January 24, 2022. The purpose of the call was obvious. How come
7 when the Applicant says that November 22, 2021 is a discovery deadline, the hearing office says no
8 it is not, and allows the Interveners to continue with their discovery, but when Applicant tries to
9 conduct discovery after November 22, 2021, it is rejected because it is past the discovery deadline?
10 November 22, 2021 cannot be treated as a discovery cut off for one party, but not a discovery cut off
11 for the other. It is either one or the other.

12 2. Legal Standard:

13 NAC 706.933 governs prehearing conferences. On December 22, 2021, Mr. Cassetty presided
14 over the prehearing conference. At the Prehearing Conference, it was determined that November 22,
15 2021 filing deadlines was not considered a discovery cut-off deadline. As such, the parties agreed to
16 supplement discovery responses, take depositions and basically, work with each other to accomplish
17 these goals. NAC 706.933 reads:

19 **NAC 706.933 Prehearing conference. (NRS 233B.050, 706.8818)**

20 1. The Authority, presiding officer or Administrator may, upon written notice to all
21 parties of record, hold a prehearing conference for the purposes of formulating or simplifying
22 the issues, obtaining admissions of fact and of documents which will avoid unnecessary proof,
23 arranging for the exchange of proposed exhibits or prepared expert testimony, limit the number
24 of witnesses and consolidate the examination of witnesses, establish procedure at the hearing
25 and resolve other matters that may expedite orderly conduct and the disposition of the
26 proceedings or settlements.

27 2. The action taken at the conference and the agreements made by the parties
28 concerned must be made a part of the record and will control the course of subsequent
proceedings, unless modified at the hearing by the presiding officer.

According to the regulation, the actions taken at the prehearing conference and agreements
made by the parties "will control the course of the subsequent proceedings."

1 As stated above, on January 24, 2022, a discovery conference call was held to clarify the
2 Hearing Officer's rulings at the December 22, 2021 prehearing conference. On the conference call,
3 Mr. Cassetty made the following representations:

4 Time on CD:

Summary of Mr. Cassetty:

5 10:14

Applicant could apply for subpoenas after Nov. 22, 2021, but
6 his is not the person who authorizes or approves subpoenas.

7 11:00

8 It was his intention that Nov. 22, 2021 was not a discovery cut
off deadline.

9 11:45

10 Again, he was permitting Applicant to Apply for subpoenas
after Nov. 22, 2021, but again, he could not approve the
11 subpoenas, because that was up to the authority or
12 administrator.

13 NAC 706.975 is the regulation dealing with appeals. It reads:

14 **NAC 706.975 Appeals to Authority. (NRS 233B.050, 706.8818)**

- 15 1. An appeal from the decision of the Administrator or hearing officer to the Authority is
permitted providing that the notice of appeal by the appellant is filed with the Administrator within
16 30 days of the decision of the Administrator or hearing officer.
17 2. Petitions for appeal must set forth the ground or grounds upon which the appellant considers
the order, decision, rule, direction or regulation to be unreasonable, unlawful, erroneous or not in
18 conformity with the law. The appellant shall include in the appeal a copy of the transcript from the
contested hearing.
19 3. Copies of the notice of appeal must be served upon the Administrator and all of the parties of
record.
20

21 The regulation states that an appeal must be filed within 30 days from the decision. The order
22 denying the application for subpoenas was entered on January 19, 2022. To be timely, this appeal has
23 to be filed on or before February 18, 2022.
24

25 The regulation holds that the Petition for Appeal must set forth the grounds which the appellant
26 considers the order to be unreasonable, unlawful, erroneous or not in conformity with the law. For the
27 purposes of this appeal, Applicants contend that the order denying the application for subpoenas was
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DATED this 11 Day of FEB, 2022.

ATTORNEY BRENT CARSON, LLC



BRENT A CARSON, ESQ.
Nevada Bar No. 5903
7935 W. Sahara Avenue, Suite 101
Las Vegas, Nevada 89117
Attorney for Independent Cab Company

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document: NOTICE OF APPEAL upon all parties of record in this proceeding by mailing a copy thereof, properly addressed, with postage prepaid, to the below listed.

Dated at Las Vegas, NV, this 11th day of February of 2022.

Robert A. Winner, Esq.
ROBERT WINNER, LTD
400 S. 4th Street, 3rd Floor
Las Vegas, NV 89101

Ryan J. Awad, Esq.
JASON A. AWAD & ASSOC.
10801 W. Charleston Blvd, #575
Las Vegas, NV 89135

Mark E. Trafton, Esq.
WHITTLESEA BLUE/HENDERSON TAXI
1900 Industrial Road
Las Vegas, NV 89102

YELLOW CHECKER AND STAR CAB
CORPORATIONS
ATTN: Keith Gibson,
General Counsel
5225 W. Post Road
Las Vegas, NV 89118

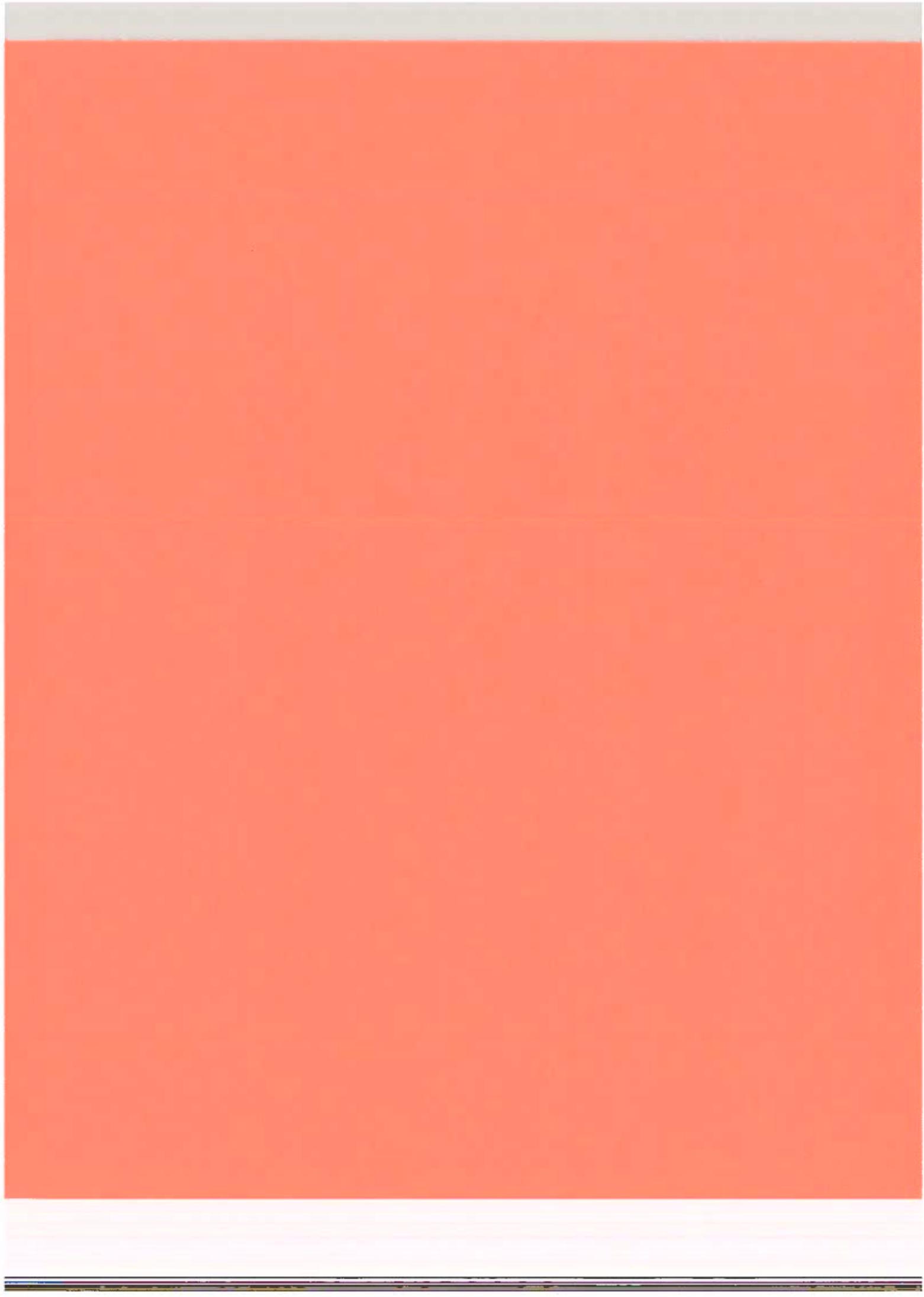
FOR THE STATE:

Asheesh Bhalla, Esq.
DEPUTY ATTORNEY GENERAL
555 E. Washington Ave., Suite 3900
Las Vegas, NV 89101

JD Decker, Interim Administrator
Nevada Taxicab Authority
2090 E. Flamingo Rd, Suite 200
Las Vegas, NV 89119



An employee of Attorney Brent Carson



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BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY

In the matter of an application for a certificate of public convenience and necessity by applicants Brent Carson and Claudia Maria Hoepfner (Independent Cab Company, LLC), and request for thirty-five taxicab medallions.

ORDER DENYING INDEPENDENT CAB, LLC'S EIGHT (8) APPLICATIONS (all filed January 18, 2022) SEEKING SUBPOENAS TO PRODUCE DOCUMENTS PURSUANT TO NAC 706.936

On January 18, 2022, applicant Independent Cab, LLC filed eight (8) applications with the Taxicab Authority in the above-captioned matter. In its applications, Independent Cab is seeking approval for subpoenas to produce documents, to be issued to various interveners in this matter. The eight (8) applications are titled:

- 1) "Applicant, Independent Cab Company's Application Pursuant to NAC 706.936 for the Taxicab Authority to Approve the Issuance of the Attached Subpoena to Produce Documents to Yellow Cab Company" (filed 1/18/22)
- 2) "Applicant, Independent Cab Company's Application Pursuant to NAC 706.936 for the Taxicab Authority to Approve the Issuance of the Attached Subpoena to Produce Documents to Checker Cab Company" (filed 1/18/22)
- 3) "Applicant, Independent Cab Company's Application Pursuant to NAC 706.936 for the Taxicab Authority to Approve the Issuance of the Attached Subpoena to Produce Documents to Star Cab Company" (filed 1/18/22)
- 4) "Applicant, Independent Cab Company's Application Pursuant to NAC 706.936 for the Taxicab Authority to Approve the Issuance of the Attached Subpoena to Produce Documents to Lucky Cab" (filed 1/18/22)
- 5) "Applicant, Independent Cab Company's Application Pursuant to NAC 706.936 for the Taxicab Authority to Approve the Issuance of the Attached Subpoena to Produce Documents to Western Cab" (filed 1/18/22)
- 6) "Applicant, Independent Cab Company's Application Pursuant to NAC 706.936 for the Taxicab Authority to Approve the Issuance of the Attached Subpoena to Produce Documents to Whittlesea Blue Cab" (filed 1/18/22)

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7) "Applicant, Independent Cab Company's Application Pursuant to NAC 706.936 for the Taxicab Authority to Approve the Issuance of the Attached Subpoena to Produce Documents to Henderson Taxi" (filed 1/18/22)

8) "Applicant, Independent Cab Company's Application Pursuant to NAC 706.936 for the Taxicab Authority to Approve the Issuance of the Attached Subpoena to Produce Documents to Desert Cab Company" (filed 1/18/22)

These eight (8) applications have been improperly submitted substantially after the discovery cut-off date (November 22, 2021), and there is an absence of evidence in all of these applications of good cause for reopening discovery for these purposes. After review and consideration, all eight (8) applications by Independent Cab are hereby DENIED.

Dated this 19th day of January, 2022.

BY THE AUTHORITY:

Dan R. Reaser
Dan R. Reaser – Chairman
Nevada Taxicab Authority

CERTIFICATE OF MAILING

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I, Nancy Moran, do hereby certify that I deposited in the U.S. mail,

postage prepaid, via First Class Mail and Certified Return receipt Requested, a true and correct copy of the foregoing Findings of Fact, Conclusions of Law, and Order to the following:

Whittlesea – Henderson
ATTN: Brent Bell
1910 Industrial Road
Las Vegas, NV 89102

Lucky Cab
ATTN: Jason Awad
4195 W. Diablo
Las Vegas, NV 89103

Whittlesea – Henderson
ATTN: Cheryl Gibbons
1910 Industrial Road
Las Vegas, NV 89102

Lucky Cab
ATTN: Ryan Awad
4195 W. Diablo
Las Vegas, NV 89103

Whittlesea – Henderson
ATTN: Mark Trafton
1910 Industrial Road
Las Vegas, NV 89102

Deluxe
ATTN: Rich Flaven
P.O. Box 531787
Henderson, NV 89053-1787

Cooper Levenson Law Firm
ATTN: Kimberly Maxson-Rushton
3016 W. Charleston Blvd., Suite 195
Las Vegas, NV 89102

Jim Jimmerson
415 S. 6th Street, Suite 100
Las Vegas, NV 89101

Western Cab
ATTN: Marilyn Moran
4195 W. Diablo
Las Vegas, NV 89103

A Cab
ATTN: Jay Nady
1500 Searles Avenue
Las Vegas, NV 89101

Western Cab
ATTN: John Moran
4195 W. Diablo
Las Vegas, NV 89103

A Cab
ATTN: Mike Malloy
1500 Searles Avenue
Las Vegas, NV 89101

Lucky/Western
ATTN: Desiree Dante
4195 W. Diablo
Las Vegas, NV 89103

ITPEU/OPEIU LOCAL
ATTN: Mike Kilgo
4480 W. Hacienda Ave., Suite 110
Las Vegas, NV 89118

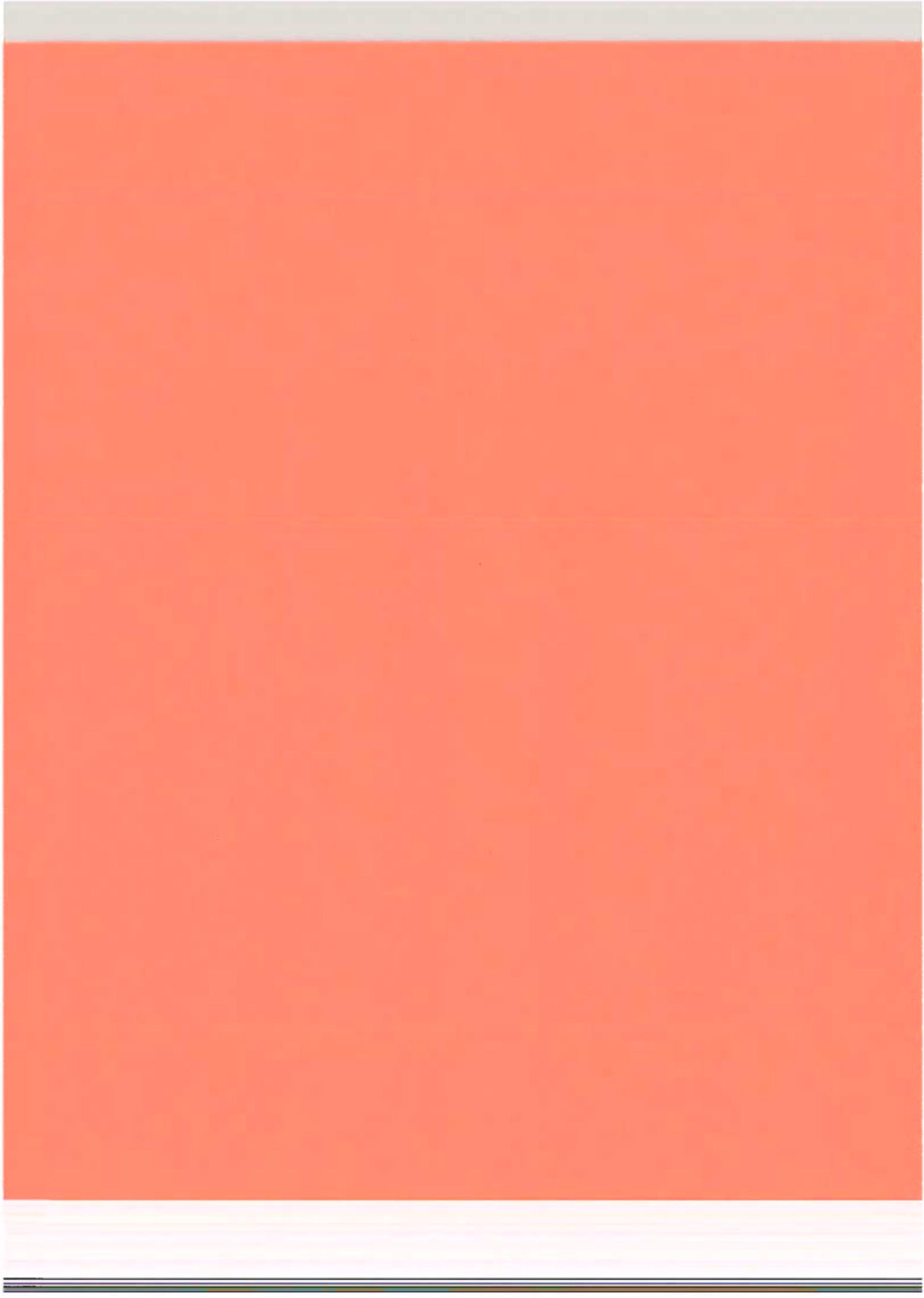
Lucky/Western
ATTN: Donald Chan
4195 W. Diablo
Las Vegas, NV 89103

Robert Winner Esq.
4675 Wynn Road
Las Vegas, NV 89103

1	Desert Cab ATTN: Rich Frakes 4675 Wynn Road Las Vegas, NV 89103	Yellow Checker Star ATTN: Keith Gibson 5225 W. Post Road Las Vegas, NV 89118
2		
3	Desert Cab ATTN: George Balaban 4675 Wynn Road Las Vegas, NV 89103	KAPTYN ATTN: Andrew Meyers 4675 S. Wynn Road Las Vegas, NV 89103
4		
5		
6	Nellis Cab ATTN: Michelle Langille 5490 Cameron Street Las Vegas, NV 89119	KAPTYN ATTN: Jim Morgan 4675 S. Wynn Road Las Vegas, NV 89103
7		
8		
9	Nellis Cab ATTN: Jamie Pino 5490 Cameron Street Las Vegas, NV 89119	KAPTYN ATTN: Michael Morrison 4675 S. Wynn Road Las Vegas, NV 89103
10		
11		
12	Esther Rodriguez Esq. 10161 Park Run Drive, Suite 150 Las Vegas, NV 89145	KAPTYN ATTN: Chris Bordonaro 4675 S. Wynn Road Las Vegas, NV 89103
13		
14	Yellow Checker Star ATTN: Mike Rawlings 5225 W. Post Road Las Vegas, NV 89118	Independent Cab Inc. ATTN: Brent Carson 7935 W. Sahara Ave., Suite 101 Las Vegas, NV 89117
15		
16		
17	Yellow Checker Star ATTN: Jonathan Schwartz 5225 W. Post Road Las Vegas, NV 89118	Independent Cab Inc. ATTN: Claudia Hoepfner 7935 W. Sahara Ave., Suite 101 Las Vegas, NV 89117
18		
19		
20		
21		

22 Dated this 19 day of January, 2022.

23
24
25
26 
27 _____
28 Employee of the Taxicab Authority



1 BRENT A. CARSON, ESQ.
Nevada Bar No. 5903
2 ATTORNEY BRENT CARSON, LLC.
bac@winnercarson.com
3 7935 W. Sahara Avenue, Suite 101
Las Vegas, Nevada 89117
4 Ph: (702) 471-1111
Fax: (702) 471-0110
5 Attorney for INDEPENDENT CAB COMPANY, LLC

JAN 18 '22 FILED

6 **BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY**

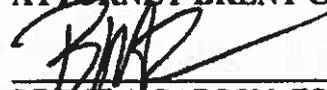
7 In the matter of An Application for a certificate)
8 of Public Convenience and Necessity by)
9 Applicants, Brent A. Carson and Claudia Maria)
10 Hoepfner (Independent ab Company, LLC),)
And Request for Thirty-Five Taxicab)
11 Medallions.)

12 **APPLICANT, INDEPENDENT CAB COMPANY'S APPLICATION PURSUANT TO NAC**
13 **706.936 FOR THE TAXICAB AUTHORITY TO APPROVE THE ISSUANCE OF THE**
14 **ATTACHED SUBPOENA TO PRODUCE DOCUMENTS TO CHECKER CAB COMPANY**

15 COMES NOW, Applicants BRENT A. CARSON and CLAUDIA MARIA HOEPPNER, by
16 and through their attorney of record, Brent A. Carson, Esq. of the law firm of ATTORNEY BRENT
17 CARSON, LLC., and submits this Application pursuant to NAC 706.936 in the above referenced
18 matter. Independent Cab Company respectfully requests the Taxicab Authority issue the Subpoena
19 attached to this Application, and identified as Exhibit "A." The attached Subpoena is in Compliance
20 with NAC 706.936 and is reasonable and not oppressive. Independent Cab Company requests
21 compliance with the attached Subpoena within ten (10) days of its issuance.

22 DATED this 15th Day of Jan, 2022.

23
24 ATTORNEY BRENT CARSON, LLC


25 BRENT A. CARSON, ESQ.

26 Nevada Bar No. 5903
27 7935 W. Sahara Avenue, Suite 101
28 Las Vegas, Nevada 89117
Attorney for Independent Cab Company

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I have this day served the foregoing document: APPLICATION FOR
3 SUBPOENA TO CHECKER CAB COMPANY upon all parties of record in this proceeding by
4 mailing a copy thereof, properly addressed, with postage prepaid, to the below listed.

5 Dated at Las Vegas, NV, this ___ day of January of 2022.

6 **FOR A-CAB:**

7 Creighton J. Nady, Owner
8 A Cab, LLC
9 1500 Searles Ave.
10 Las Vegas, NV 89101

11 Esther C. Rodriguez, Esq.
12 Rodriguez Law Offices, P.C.
10161 Park Run Drive, Suite 150
13 Las Vegas, NV 89145

14 **FOR DESERT CAB:**

15 George Balaban
16 DESERT CAB COMPANY
4675 Wynn Road
17 Las Vegas, NV 89103

18 Robert A. Winner, Esq.
19 ROBERT WINNER, LTD
400 S. 4th Street, 3rd Floor
20 Las Vegas, NV 89101

21 **FOR LUCKY AND WESTERN CAB:**

22 Jason A. Awad, Esq.
23 Desiree Dante
4195 W. Diablo Dr.
24 Las Vegas, NV 89118

25 Ryan J. Awad, Esq.
26 JASON A. AWAD & ASSOC.
10801 W. Charleston Blvd, #575
27 Las Vegas, NV 89135
28

1 FOR WHITTLESEA BLUE/HENDERSON TAXI

2 Cheryl D. Gibbons, General Manager
3 WHITTLESEA BLUE/HENDERSON TAXI
4 And VIRGIN VALLEY CAB
5 1910 Industrial Road
6 Las Vegas, NV 89102

7 Mark E. Trafton, Esq.
8 WHITTLESEA BLUE/HENDERSON TAXI
9 1910 Industrial Road
10 Las Vegas, NV 89102

11 FOR YCS CORPS:

12 YELLOW CHECKER AND STAR CAB
13 CORPORATIONS
14 ATTN: Keith Gibson,
15 General Counsel
16 5225 W. Post Road
17 Las Vegas, NV 89118

18 FOR THE STATE:

19 Asheesh Bhalla, Esq.
20 DEPUTY ATTORNEY GENERAL
21 555 E. Washington Ave., Suite 3900
22 Las Vegas, NV 89101

23 JD Decker, Interim Administrator
24 Nevada Taxicab Authority
25 2090 E. Flamingo Rd, Suite 200
26 Las Vegas, NV 89119

27 David Ricker, Esq.
28 NEVADA TAXICAB AUTHORITY
2090 E. Flamingo Rd, Suite 200
Las Vegas, NV 89119

An employee of Attorney Brent Carson

EXHIBIT A

1 BRENT A. CARSON, ESQ.
Nevada Bar No. 5903
2 ATTORNEY BRENT CARSON, LLC.
bac@winnercarson.com
3 7935 W. Sahara Avenue, Suite 101
Las Vegas, Nevada 89117
4 Ph: (702) 471-1111
Fax: (702) 471-0110
5 Attorney for INDEPENDENT CAB COMPANY, LLC

6 **BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY**

7 In the matter of An Application for a certificate)
8 of Public Convenience and Necessity by)
Applicants, Brent A. Carson and Claudia Maria)
9 Hoepfner (Independent Cab Company, LLC),)
10 And Request for Thirty-Five Taxicab)
Medallions.)

11 _____
12 **SUBPOENA FOR DOCUMENT PRODUCTION TO CHECKER CAB**

13 TO: CHECKER CAB

14 TO: KEITH GIBSON, ESQ., their attorney

15 Pursuant to the Order of the Hearing Officer and the Application on file herein, and pursuant
16 to NAC 706.936, Independent Cab Company requests that the following documents subpoenaed be
17 produced by Intervenor within ten (10) days.
18

19 **ITEMS TO BE PRODUCED:**

- 20 1. Any and all documents, exhibits or other tangible items you intend to offer into evidence at the
21 hearing on Independent Cab Company's Application for a Certificate of Public Convenience
22 and Necessity.
- 23 2. Produce the Tax Returns for Checker Cab for the past two years: 2019 and 2020.
- 24 3. Produce Checker Cab's annual reports filed with the Nevada Taxicab Authority for the years
25 2019 and 2020.
- 26 4. Produce any and all documents that support your contention that there is no need for any
27 additional taxicab medallions in Clark County.
- 28 5. Produce any and all documents that support your contention that 35 additional medallions will

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unreasonably and adversely affect your operations.

- 6. Produce any and all documents that support your contention that 35 additional medallions will not benefit the travelling public.
- 7. Produce any and all documents that Applicants are not fit to perform the services of a taxicab motor carrier.
- 8. Produce any and all documents that Applicants are not willing to perform the services of a taxicab motor carrier.
- 9. Produce any and all documents that Applicants are not able to perform the services of a taxicab motor carrier.

DATED this 15 Day of Jan, 2022.

ATTORNEY BRENT CARSON, LLC



BRENT A CARSON, ESQ.
Nevada Bar No. 5903
7935 W. Sahara Avenue, Suite 101
Las Vegas, Nevada 89117
Attorney for Independent Cab Company

ISSUED AND APPROVED BY:

Nevada Taxicab Authority
J.D. Decker, Interim Administrator

Date: _____

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I have this day served the foregoing document: SUBPOENA TO CHECKER CAB
3 upon all parties of record in this proceeding by mailing a copy thereof, properly addressed, with
4 postage prepaid, to the below listed.

5 Dated at Las Vegas, NV, this ___ day of January of 2022.

6 **FOR A-CAB:**

7 Creighton J. Nady, Owner
8 A Cab, LLC
9 1500 Searles Ave.
Las Vegas, NV 89101

10 Esther C. Rodriguez, Esq.
11 Rodriguez Law Offices, P.C.
12 10161 Park Run Drive, Suite 150
Las Vegas, NV 89145

13 **FOR DESERT CAB:**

14 George Balaban
15 DESERT CAB COMPANY
16 4675 Wynn Road
Las Vegas, NV 89103

17 Robert A. Winner, Esq.
18 ROBERT WINNER, LTD
19 400 S. 4th Street, 3rd Floor
Las Vegas, NV 89101

20 **FOR LUCKY AND WESTERN CAB:**

21 Jason A. Awad, Esq.
22 Desiree Dante
23 4195 W. Diablo Dr.
Las Vegas, NV 89118

24 Ryan J. Awad, Esq.
25 JASON A. AWAD & ASSOC.
26 10801 W. Charleston Blvd, #575
Las Vegas, NV 89135

27
28

1 FOR WHITTLESEA BLUE/HENDERSON TAXI

2 Cheryl D. Gibbons, General Manager
WHITTLESEA BLUE/HENDERSON TAXI
3 And VIRGIN VALLEY CAB
4 1910 Industrial Road
Las Vegas, NV 89102

5 Mark E. Trafton, Esq.
6 WHITTLESEA BLUE/HENDERSON TAXI
7 1910 Industrial Road
Las Vegas, NV 89102

8 FOR YCS CORPS:

9 YELLOW CHECKER AND STAR CAB
10 CORPORATIONS
11 ATTN: Keith Gibson,
General Counsel
12 5225 W. Post Road
Las Vegas, NV 89118

13 FOR THE STATE:

14 Asheesh Bhalla, Esq.
15 DEPUTY ATTORNEY GENERAL
16 555 E. Washington Ave., Suite 3900
Las Vegas, NV 89101

17 JD Decker, Interim Administrator
18 Nevada Taxicab Authority
19 2090 E. Flamingo Rd, Suite 200
Las Vegas, NV 89119

20 David Ricker, Esq.
21 NEVADA TAXICAB AUTHORITY
22 2090 E. Flamingo Rd, Suite 200
Las Vegas, NV 89119

23

24

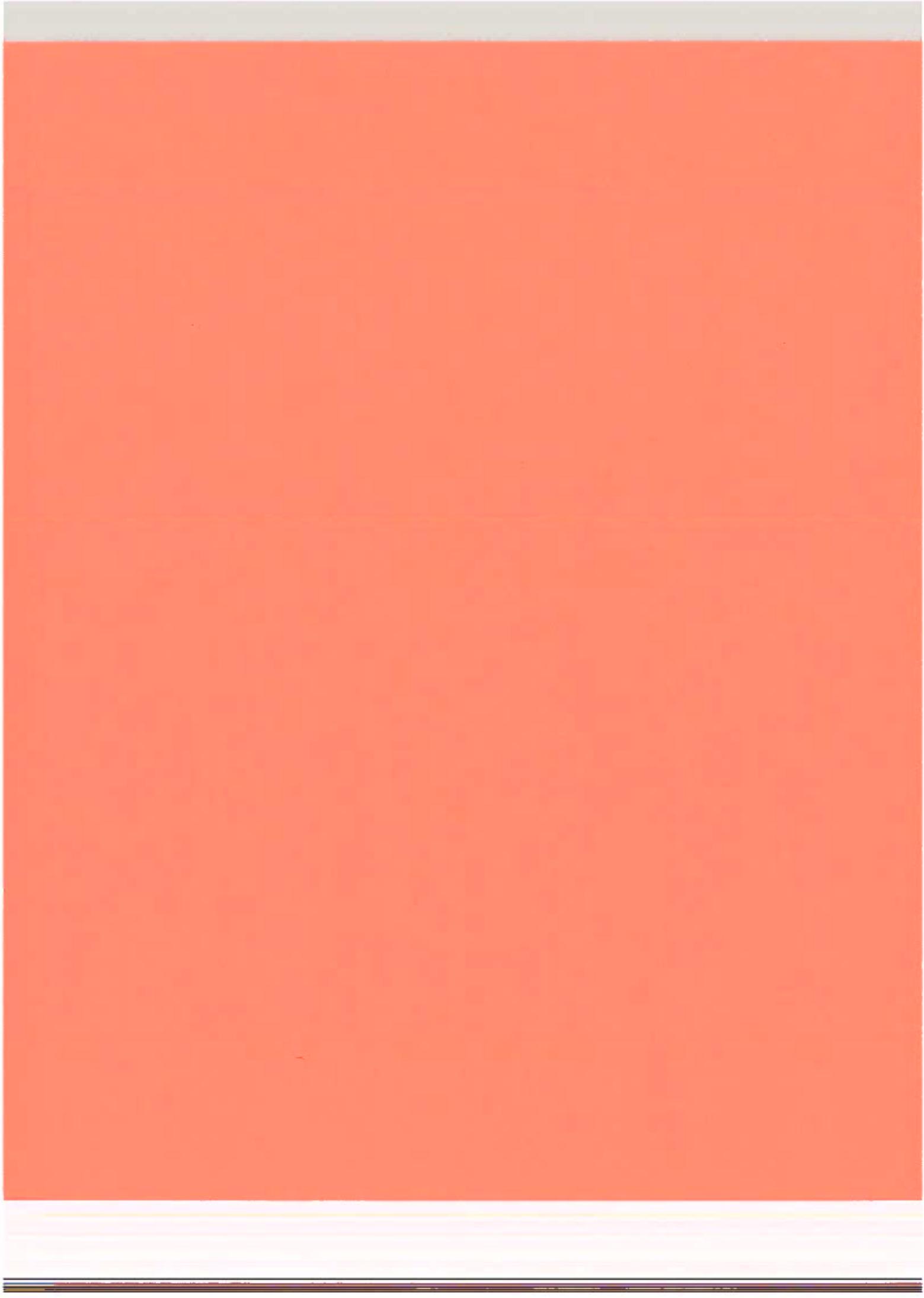
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26

27

28

An employee of Attorney Brent Carson



1 BRENT A. CARSON, ESQ.
2 Nevada Bar No. 5903
3 ATTORNEY BRENT CARSON, LLC.
4 bac@winnercarson.com
5 7935 W. Sahara Avenue, Suite 101
6 Las Vegas, Nevada 89117
7 Ph: (702) 471-1111
8 Fax: (702) 471-0110
9 Attorney for INDEPENDENT CAB COMPANY, LLC

JAN 13 '22 FILED

6 **BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY**

7 In the matter of An Application for a certificate)
8 of Public Convenience and Necessity by)
9 Applicants, Brent A. Carson and Claudia Maria)
10 Hoepfner (Independent ab Company, LLC),)
11 And Request for Thirty-Five Taxicab)
12 Medallions.)

12 **APPLICANT, INDEPENDENT CAB COMPANY'S APPLICATION PURSUANT TO NAC**
13 **706.936 FOR THE TAXICAB AUTHORITY TO APPROVE THE ISSUANCE OF THE**
14 **ATTACHED SUBPOENA TO PRODUCE DOCUMENTS TO DESERT CAB COMPANY**

15 COMES NOW, Applicants BRENT A. CARSON and CLAUDIA MARIA HOEPPNER, by
16 and through their attorney of record, Brent A. Carson, Esq. of the law firm of ATTORNEY BRENT
17 CARSON, LLC., and submits this Application pursuant to NAC 706.936 in the above referenced
18 matter. Independent Cab Company respectfully requests the Taxicab Authority issue the Subpoena
19 attached to this Application, and identified as Exhibit "A." The attached Subpoena is in Compliance
20 with NAC 706.936 and is reasonable and not oppressive. Independent Cab Company requests
21 compliance with the attached Subpoena within ten (10) days of its issuance.

22 DATED this 15 Day of Jan, 2022.

24 ATTORNEY BRENT CARSON, LLC

25 
26 BRENT A. CARSON, ESQ.
27 Nevada Bar No. 5903
28 7935 W. Sahara Avenue, Suite 101
Las Vegas, Nevada 89117
Attorney for Independent Cab Company

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I have this day served the foregoing document: APPLICATION FOR
3 SUBPOENA TO DESERT CAB COMPANY upon all parties of record in this proceeding by mailing
4 a copy thereof, properly addressed, with postage prepaid, to the below listed.

5 Dated at Las Vegas, NV, this ___ day of January of 2022.

6 **FOR A-CAB:**

7 Creighton J. Nady, Owner
8 A Cab, LLC
9 1500 Searles Ave.
10 Las Vegas, NV 89101

11 Esther C. Rodriguez, Esq.
12 Rodriguez Law Offices, P.C.
10161 Park Run Drive, Suite 150
13 Las Vegas, NV 89145

14 **FOR DESERT CAB:**

15 George Balaban
16 DESERT CAB COMPANY
4675 Wynn Road
17 Las Vegas, NV 89103

18 Robert A. Winner, Esq.
19 ROBERT WINNER, LTD
400 S. 4th Street, 3rd Floor
20 Las Vegas, NV 89101

21 **FOR LUCKY AND WESTERN CAB:**

22 Jason A. Awad, Esq.
23 Desiree Dante
4195 W. Diablo Dr.
24 Las Vegas, NV 89118

25 Ryan J. Awad, Esq.
26 JASON A. AWAD & ASSOC.
10801 W. Charleston Blvd, #575
27 Las Vegas, NV 89135
28

1 FOR WHITTLESEA BLUE/HENDERSON TAXI

2 Cheryl D. Gibbons, General Manager
3 WHITTLESEA BLUE/HENDERSON TAXI
4 And VIRGIN VALLEY CAB
5 1910 Industrial Road
6 Las Vegas, NV 89102

7 Mark E. Trafton, Esq.
8 WHITTLESEA BLUE/HENDERSON TAXI
9 1910 Industrial Road
10 Las Vegas, NV 89102

11 FOR YCS CORPS:

12 YELLOW CHECKER AND STAR CAB
13 CORPORATIONS
14 ATTN: Keith Gibson,
15 General Counsel
16 5225 W. Post Road
17 Las Vegas, NV 89118

18 FOR THE STATE:

19 Asheesh Bhalla, Esq.
20 DEPUTY ATTORNEY GENERAL
21 555 E. Washington Ave., Suite 3900
22 Las Vegas, NV 89101

23 JD Decker, Interim Administrator
24 Nevada Taxicab Authority
25 2090 E. Flamingo Rd, Suite 200
26 Las Vegas, NV 89119

27 David Ricker, Esq.
28 NEVADA TAXICAB AUTHORITY
2090 E. Flamingo Rd, Suite 200
Las Vegas, NV 89119

An employee of Attorney Brent Carson

EXHIBIT A

1 BRENT A. CARSON, ESQ.
Nevada Bar No. 5903
2 ATTORNEY BRENT CARSON, LLC.
bac@winnercarson.com
7935 W. Sahara Avenue, Suite 101
3 Las Vegas, Nevada 89117
Ph: (702) 471-1111
4 Fax: (702) 471-0110
5 Attorney for INDEPENDENT CAB COMPANY, LLC

6 **BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY**

7 In the matter of An Application for a certificate)
of Public Convenience and Necessity by)
8 Applicants, Brent A. Carson and Claudia Maria)
9 Hoepfner (Independent Cab Company, LLC),)
And Request for Thirty-Five Taxicab)
10 Medallions.)

11 _____
12 **SUBPOENA FOR DOCUMENT PRODCUTION TO DESERT CAB COMPANY**

13 TO: DESERT CAB COMPANY

14 TO: ROBERT A. WINNER, ESQ., their attorney

15 Pursuant to the Order of the Hearing Officer and the Application on file herein, and pursuant
16 to NAC 706.936, Independent Cab Company requests that the following documents subpoenaed be
17 produced by Intervenor within ten (10) days.

18 **ITEMS TO BE PRODUCED:**

- 19
- 20 1. Any and all documents, exhibits or other tangible items you intend to offer into evidence at the
21 hearing on Independent Cab Company's Application for a Certificate of Public Convenience
22 and Necessity.
 - 23 2. Produce the Tax Returns for Desert Cab Company for the past two years: 2019 and 2020.
 - 24 3. Produce Desert Cab Company's annual reports filed with the Nevada Taxicab Authority for
25 the years 2019 and 2020.
 - 26 4. Produce any and all documents that support your contention that there is no need for any
27 additional taxicab medallions in Clark County.
 - 28 5. Produce any and all documents that support your contention that 35 additional medallions will

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unreasonably and adversely affect your operations.

6. Produce any and all documents that support your contention that 35 additional medallions will not benefit the travelling public.
7. Produce any and all documents that Applicants are not fit to perform the services of a taxicab motor carrier.
8. Produce any and all documents that Applicants are not willing to perform the services of a taxicab motor carrier.
9. Produce any and all documents that Applicants are not able to perform the services of a taxicab motor carrier.

DATED this 15 Day of Jun, 2022.

ATTORNEY BRENT CARSON, LLC



BRENT A CARSON, ESQ.
Nevada Bar No. 5903
7935 W. Sahara Avenue, Suite 101
Las Vegas, Nevada 89117
Attorney for Independent Cab Company

ISSUED AND APPROVED BY:

Nevada Taxicab Authority
J.D. Decker, Interim Administrator

Date: _____

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I have this day served the foregoing document: SUBPOENA TO DESERT CAB
3 COMPANY upon all parties of record in this proceeding by mailing a copy thereof, properly
4 addressed, with postage prepaid, to the below listed.

5 Dated at Las Vegas, NV, this ___ day of January of 2022.

6 **FOR A-CAB:**

7 Creighton J. Nady, Owner
8 A Cab, LLC
9 1500 Searles Ave.
10 Las Vegas, NV 89101

11 Esther C. Rodriguez, Esq.
12 Rodriguez Law Offices, P.C.
13 10161 Park Run Drive, Suite 150
14 Las Vegas, NV 89145

15 **FOR DESERT CAB:**

16 George Balaban
17 DESERT CAB COMPANY
18 4675 Wynn Road
19 Las Vegas, NV 89103

20 Robert A. Winner, Esq.
21 ROBERT WINNER, LTD
22 400 S. 4th Street, 3rd Floor
23 Las Vegas, NV 89101

24 **FOR LUCKY AND WESTERN CAB:**

25 Jason A. Awad, Esq.
26 Desiree Dante
27 4195 W. Diablo Dr.
28 Las Vegas, NV 89118

Ryan J. Awad, Esq.
JASON A. AWAD & ASSOC.
10801 W. Charleston Blvd, #575
Las Vegas, NV 89135

1 FOR WHITTLESEA BLUE/HENDERSON TAXI

2 Cheryl D. Gibbons, General Manager
3 WHITTLESEA BLUE/HENDERSON TAXI
4 And VIRGIN VALLEY CAB
5 1910 Industrial Road
6 Las Vegas, NV 89102

7 Mark E. Trafton, Esq.
8 WHITTLESEA BLUE/HENDERSON TAXI
9 1910 Industrial Road
10 Las Vegas, NV 89102

11 FOR YCS CORPS:

12 YELLOW CHECKER AND STAR CAB
13 CORPORATIONS
14 ATTN: Keith Gibson,
15 General Counsel
16 5225 W. Post Road
17 Las Vegas, NV 89118

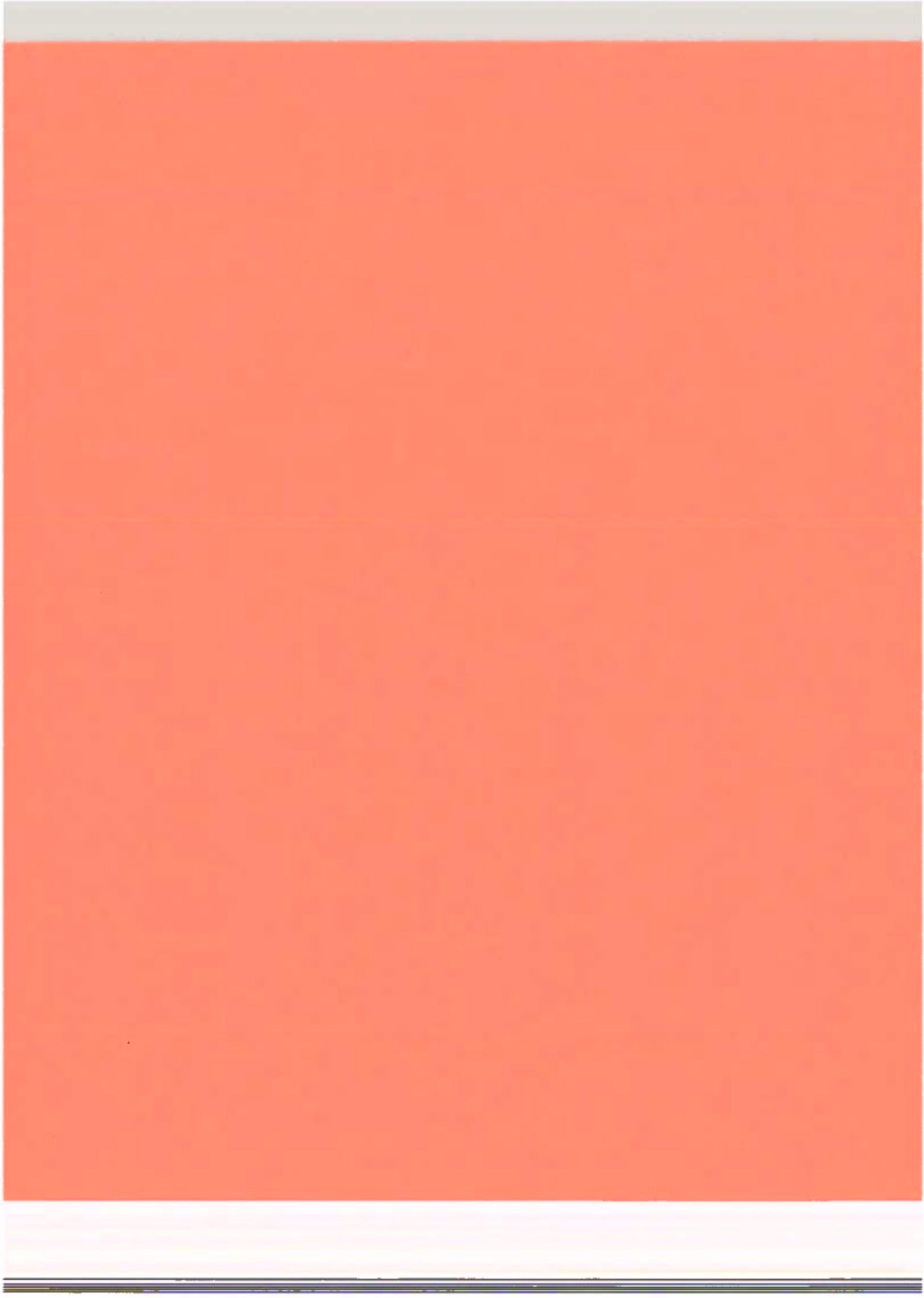
18 FOR THE STATE:

19 Asheesh Bhalla, Esq.
20 DEPUTY ATTORNEY GENERAL
21 555 E. Washington Ave., Suite 3900
22 Las Vegas, NV 89101

23 JD Decker, Interim Administrator
24 Nevada Taxicab Authority
25 2090 E. Flamingo Rd, Suite 200
26 Las Vegas, NV 89119

27 David Ricker, Esq.
28 NEVADA TAXICAB AUTHORITY
29 2090 E. Flamingo Rd, Suite 200
30 Las Vegas, NV 89119

An employee of Attorney Brent Carson



1 BRENT A. CARSON, ESQ.
2 Nevada Bar No. 5903
3 ATTORNEY BRENT CARSON, LLC.
4 bac@winnercarson.com
5 7935 W. Sahara Avenue, Suite 101
6 Las Vegas, Nevada 89117
7 Ph: (702) 471-1111
8 Fax: (702) 471-0110
9 Attorney for INDEPENDENT CAB COMPANY, LLC

JAN 18 '22 FILED

6 **BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY**

7 In the matter of An Application for a certificate)
8 of Public Convenience and Necessity by)
9 Applicants, Brent A. Carson and Claudia Maria)
10 Hoeppner (Independent ab Company, LLC),)
11 And Request for Thirty-Five Taxicab)
12 Medallions.)

13 **APPLICANT, INDEPENDENT CAB COMPANY'S APPLICATION PURSUANT TO NAC**
14 **706.936 FOR THE TAXICAB AUTHORITY TO APPROVE THE ISSUANCE OF THE**
15 **ATTACHED SUBPOENA TO PRODUCE DOCUMENTS TO HENDERSON TAXI**

16 COMES NOW, Applicants BRENT A. CARSON and CLAUDIA MARIA HOEPPNER, by
17 and through their attorney of record, Brent A. Carson, Esq. of the law firm of ATTORNEY BRENT
18 CARSON, LLC., and submits this Application pursuant to NAC 706.936 in the above referenced
19 matter. Independent Cab Company respectfully requests the Taxicab Authority issue the Subpoena
20 attached to this Application, and identified as Exhibit "A." The attached Subpoena is in Compliance
21 with NAC 706.936 and is reasonable and not oppressive. Independent Cab Company requests
22 compliance with the attached Subpoena within ten (10) days of its issuance.

23 DATED this 15 Day of Jan, 2022.

24 ATTORNEY BRENT CARSON, LLC

25 

26 BRENT A CARSON, ESQ.

27 Nevada Bar No. 5903

28 7935 W. Sahara Avenue, Suite 101

Las Vegas, Nevada 89117

Attorney for Independent Cab Company

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I have this day served the foregoing document: APPLICATION FOR
3 SUBPOENA TO HENDERSON TAXI upon all parties of record in this proceeding by mailing a copy
4 thereof, properly addressed, with postage prepaid, to the below listed.

5 Dated at Las Vegas, NV, this ___ day of January of 2022.

6 **FOR A-CAB:**

7 Creighton J. Nady, Owner
8 A Cab, LLC
9 1500 Searles Ave.
10 Las Vegas, NV 89101

11 Esther C. Rodriguez, Esq.
12 Rodriguez Law Offices, P.C.
10161 Park Run Drive, Suite 150
13 Las Vegas, NV 89145

14 **FOR DESERT CAB:**

15 George Balaban
16 DESERT CAB COMPANY
4675 Wynn Road
17 Las Vegas, NV 89103

18 Robert A. Winner, Esq.
19 ROBERT WINNER, LTD
400 S. 4th Street, 3rd Floor
20 Las Vegas, NV 89101

21 **FOR LUCKY AND WESTERN CAB:**

22 Jason A. Awad, Esq.
23 Desiree Dante
4195 W. Diablo Dr.
24 Las Vegas, NV 89118

25 Ryan J. Awad, Esq.
26 JASON A. AWAD & ASSOC.
10801 W. Charleston Blvd, #575
27 Las Vegas, NV 89135
28

1 FOR WHITTLESEA BLUE/HENDERSON TAXI

2 Cheryl D. Gibbons, General Manager
3 WHITTLESEA BLUE/HENDERSON TAXI
4 And VIRGIN VALLEY CAB
5 1910 Industrial Road
6 Las Vegas, NV 89102

7 Mark E. Trafton, Esq.
8 WHITTLESEA BLUE/HENDERSON TAXI
9 1910 Industrial Road
10 Las Vegas, NV 89102

11 FOR YCS CORPS:

12 YELLOW CHECKER AND STAR CAB
13 CORPORATIONS
14 ATTN: Keith Gibson,
15 General Counsel
16 5225 W. Post Road
17 Las Vegas, NV 89118

18 FOR THE STATE:

19 Asheesh Bhalla, Esq.
20 DEPUTY ATTORNEY GENERAL
21 555 E. Washington Ave., Suite 3900
22 Las Vegas, NV 89101

23 JD Decker, Interim Administrator
24 Nevada Taxicab Authority
25 2090 E. Flamingo Rd, Suite 200
26 Las Vegas, NV 89119

27 David Ricker, Esq.
28 NEVADA TAXICAB AUTHORITY
2090 E. Flamingo Rd, Suite 200
Las Vegas, NV 89119

An employee of Attorney Brent Carson

EXHIBIT A

1 BRENT A. CARSON, ESQ.
Nevada Bar No. 5903
2 ATTORNEY BRENT CARSON, LLC.
bac@winnercarson.com
3 7935 W. Sahara Avenue, Suite 101
Las Vegas, Nevada 89117
4 Ph: (702) 471-1111
Fax: (702) 471-0110
5 Attorney for INDEPENDENT CAB COMPANY, LLC

6 **BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY**

7 In the matter of An Application for a certificate)
8 of Public Convenience and Necessity by)
9 Applicants, Brent A. Carson and Claudia Maria)
10 Hoeppner (Independent ab Company, LLC),)
And Request for Thirty-Five Taxicab)
11 Medallions.)

12 **SUBPOENA FOR DOCUMENT PRODCUTION TO HENDERSON TAXI**

13 TO: HENDERSON TAXI
14 TO: MARK TRAFTON, ESQ., their attorney

15 Pursuant to the Order of the Hearing Officer and the Application on file herein, and pursuant
16 to NAC 706.936, Independent Cab Company requests that the following documents subpoenaed be
17 produced by Intervenor within ten (10) days.

18 **ITEMS TO BE PRODUCED:**

- 19
- 20 1. Any and all documents, exhibits or other tangible items you intend to offer into evidence at the
21 hearing on Independent Cab Company's Application for a Certificate of Public Convenience
22 and Necessity.
 - 23 2. Produce the Tax Returns for Henderson Taxi for the past two years: 2019 and 2020.
 - 24 3. Produce Henderson Taxi's annual reports filed with the Nevada Taxicab Authority for the
25 years 2019 and 2020.
 - 26 4. Produce any and all documents that support your contention that there is no need for any
27 additional taxicab medallions in Clark County.
 - 28 5. Produce any and all documents that support your contention that 35 additional medallions will

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unreasonably and adversely affect your operations.

- 6. Produce any and all documents that support your contention that 35 additional medallions will not benefit the travelling public.
- 7. Produce any and all documents that Applicants are not fit to perform the services of a taxicab motor carrier.
- 8. Produce any and all documents that Applicants are not willing to perform the services of a taxicab motor carrier.
- 9. Produce any and all documents that Applicants are not able to perform the services of a taxicab motor carrier.

DATED this 15 Day of June, 2022.

ATTORNEY BRENT CARSON, LLC



BRENT A CARSON, ESQ.
Nevada Bar No. 5903
7935 W. Sahara Avenue, Suite 101
Las Vegas, Nevada 89117
Attorney for Independent Cab Company

ISSUED AND APPROVED BY:

Nevada Taxicab Authority
J.D. Decker, Interim Administrator

Date: _____

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I have this day served the foregoing document: SUBPOENA TO WHITTLSEA
3 BLUE CAB upon all parties of record in this proceeding by mailing a copy thereof, properly addressed,
4 with postage prepaid, to the below listed.

5 Dated at Las Vegas, NV, this ___ day of January of 2022.

6 **FOR A-CAB:**

7 Creighton J. Nady, Owner
8 A Cab, LLC
9 1500 Searles Ave.
10 Las Vegas, NV 89101

11 Esther C. Rodriguez, Esq.
12 Rodriguez Law Offices, P.C.
13 10161 Park Run Drive, Suite 150
14 Las Vegas, NV 89145

15 **FOR DESERT CAB:**

16 George Balaban
17 DESERT CAB COMPANY
18 4675 Wynn Road
19 Las Vegas, NV 89103

20 Robert A. Winner, Esq.
21 ROBERT WINNER, LTD
22 400 S. 4th Street, 3rd Floor
23 Las Vegas, NV 89101

24 **FOR LUCKY AND WESTERN CAB:**

25 Jason A. Awad, Esq.
26 Desiree Dante
27 4195 W. Diablo Dr.
28 Las Vegas, NV 89118

Ryan J. Awad, Esq.
JASON A. AWAD & ASSOC.
10801 W. Charleston Blvd, #575
Las Vegas, NV 89135

1 FOR WHITTLESEA BLUE/HENDERSON TAXI

2 Cheryl D. Gibbons, General Manager
3 WHITTLESEA BLUE/HENDERSON TAXI
4 And VIRGIN VALLEY CAB
5 1910 Industrial Road
6 Las Vegas, NV 89102

7 Mark E. Trafton, Esq.
8 WHITTLESEA BLUE/HENDERSON TAXI
9 1910 Industrial Road
10 Las Vegas, NV 89102

11 FOR YCS CORPS:

12 YELLOW CHECKER AND STAR CAB
13 CORPORATIONS
14 ATTN: Keith Gibson,
15 General Counsel
16 5225 W. Post Road
17 Las Vegas, NV 89118

18 FOR THE STATE:

19 Asheesh Bhalla, Esq.
20 DEPUTY ATTORNEY GENERAL
21 555 E. Washington Ave., Suite 3900
22 Las Vegas, NV 89101

23 JD Decker, Interim Administrator
24 Nevada Taxicab Authority
25 2090 E. Flamingo Rd, Suite 200
26 Las Vegas, NV 89119

27 David Ricker, Esq.
28 NEVADA TAXICAB AUTHORITY
29 2090 E. Flamingo Rd, Suite 200
30 Las Vegas, NV 89119

An employee of Attorney Brent Carson

1 BRENT A. CARSON, ESQ.
2 Nevada Bar No. 5903
3 ATTORNEY BRENT CARSON, LLC.
4 bac@winnercarson.com
5 7935 W. Sahara Avenue, Suite 101
6 Las Vegas, Nevada 89117
7 Ph: (702) 471-1111
8 Fax: (702) 471-0110
9 Attorney for INDEPENDENT CAB COMPANY, LLC

JAN 18 '22 FILED

6 **BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY**

7 In the matter of An Application for a certificate)
8 of Public Convenience and Necessity by)
9 Applicants, Brent A. Carson and Claudia Maria)
10 Hoeppner (Independent ab Company, LLC),)
11 And Request for Thirty-Five Taxicab)
12 Medallions.)

12 **APPLICANT, INDEPENDENT CAB COMPANY'S APPLICATION PURSUANT TO NAC**
13 **706.936 FOR THE TAXICAB AUTHORITY TO APPROVE THE ISSUANCE OF THE**
14 **ATTACHED SUBPOENA TO PRODUCE DOCUMENTS TO LUCKY CAB**

15 COMES NOW, Applicants BRENT A. CARSON and CLAUDIA MARIA HOEPPNER, by
16 and through their attorney of record, Brent A. Carson, Esq. of the law firm of ATTORNEY BRENT
17 CARSON, LLC., and submits this Application pursuant to NAC 706.936 in the above referenced
18 matter. Independent Cab Company respectfully requests the Taxicab Authority issue the Subpoena
19 attached to this Application, and identified as Exhibit "A." The attached Subpoena is in Compliance
20 with NAC 706.936 and is reasonable and not oppressive. Independent Cab Company requests
21 compliance with the attached Subpoena within ten (10) days of its issuance.

22 DATED this 15 Day of Jan, 2022.

24 ATTORNEY BRENT CARSON, LLC

25 

26 BRENT A CARSON, ESQ.

27 Nevada Bar No. 5903

7935 W. Sahara Avenue, Suite 101

Las Vegas, Nevada 89117

Attorney for Independent Cab Company

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I have this day served the foregoing document: APPLICATION FOR
3 SUBPOENA TO LUCKY CAB upon all parties of record in this proceeding by mailing a copy thereof,
4 properly addressed, with postage prepaid, to the below listed.

5 Dated at Las Vegas, NV, this ___ day of January of 2022.

6 **FOR A-CAB:**

7 Creighton J. Nady, Owner
8 A Cab, LLC
9 1500 Searles Ave.
10 Las Vegas, NV 89101

11 Esther C. Rodriguez, Esq.
12 Rodriguez Law Offices, P.C.
10161 Park Run Drive, Suite 150
13 Las Vegas, NV 89145

14 **FOR DESERT CAB:**

15 George Balaban
16 DESERT CAB COMPANY
4675 Wynn Road
17 Las Vegas, NV 89103

18 Robert A. Winner, Esq.
19 ROBERT WINNER, LTD
400 S. 4th Street, 3rd Floor
20 Las Vegas, NV 89101

21 **FOR LUCKY AND WESTERN CAB:**

22 Jason A. Awad, Esq.
23 Desiree Dante
4195 W. Diablo Dr.
24 Las Vegas, NV 89118

25 Ryan J. Awad, Esq.
26 JASON A. AWAD & ASSOC.
10801 W. Charleston Blvd, #575
27 Las Vegas, NV 89135
28

1 FOR WHITTLESEA BLUE/HENDERSON TAXI

2 Cheryl D. Gibbons, General Manager
3 WHITTLESEA BLUE/HENDERSON TAXI
4 And VIRGIN VALLEY CAB
5 1910 Industrial Road
6 Las Vegas, NV 89102

7 Mark E. Trafton, Esq.
8 WHITTLESEA BLUE/HENDERSON TAXI
9 1910 Industrial Road
10 Las Vegas, NV 89102

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12 YELLOW CHECKER AND STAR CAB
13 CORPORATIONS
14 ATTN: Keith Gibson,
15 General Counsel
16 5225 W. Post Road
17 Las Vegas, NV 89118

18 FOR THE STATE:

19 Asheesh Bhalla, Esq.
20 DEPUTY ATTORNEY GENERAL
21 555 E. Washington Ave., Suite 3900
22 Las Vegas, NV 89101

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24 Nevada Taxicab Authority
25 2090 E. Flamingo Rd, Suite 200
26 Las Vegas, NV 89119

27 David Ricker, Esq.
28 NEVADA TAXICAB AUTHORITY
29 2090 E. Flamingo Rd, Suite 200
30 Las Vegas, NV 89119

An employee of Attorney Brent Carson

EXHIBIT A

1 BRENT A. CARSON, ESQ.
2 Nevada Bar No. 5903
3 ATTORNEY BRENT CARSON, LLC.
4 bac@winnercarson.com
5 7935 W. Sahara Avenue, Suite 101
6 Las Vegas, Nevada 89117
7 Ph: (702) 471-1111
8 Fax: (702) 471-0110
9 Attorney for INDEPENDENT CAB COMPANY, LLC

10 **BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY**

11 In the matter of An Application for a certificate)
12 of Public Convenience and Necessity by)
13 Applicants, Brent A. Carson and Claudia Maria)
14 Hoepfner (Independent ab Company, LLC),)
15 And Request for Thirty-Five Taxicab)
16 Medallions.)

17 **SUBPOENA FOR DOCUMENT PRODCUTION TO LUCKY CAB**

18 TO: LUCKY CAB
19 TO: RYAN AWAD, ESQ., their attorney

20 Pursuant to the Order of the Hearing Officer and the Application on file herein, and pursuant
21 to NAC 706.936, Independent Cab Company requests that the following documents subpoenaed be
22 produced by Intervenor within ten (10) days.

23 **ITEMS TO BE PRODUCED:**

- 24 1. Any and all documents, exhibits or other tangible items you intend to offer into evidence at the
25 hearing on Independent Cab Company's Application for a Certificate of Public Convenience
26 and Necessity.
- 27 2. Produce the Tax Returns for Lucky Cab for the past two years: 2019 and 2020.
- 28 3. Produce Lucky Cab's annual reports filed with the Nevada Taxicab Authority for the years
2019 and 2020.
4. Produce any and all documents that support your contention that there is no need for any
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5. Produce any and all documents that support your contention that 35 additional medallions will

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- 7. Produce any and all documents that Applicants are not fit to perform the services of a taxicab motor carrier.
- 8. Produce any and all documents that Applicants are not willing to perform the services of a taxicab motor carrier.
- 9. Produce any and all documents that Applicants are not able to perform the services of a taxicab motor carrier.

DATED this 15 Day of June, 2022.

ATTORNEY BRENT CARSON, LLC


BRENT A. CARSON, ESQ.
Nevada Bar No. 5903
7935 W. Sahara Avenue, Suite 101
Las Vegas, Nevada 89117
Attorney for Independent Cab Company

ISSUED AND APPROVED BY:

Nevada Taxicab Authority
J.D. Decker, Interim Administrator

Date: _____

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I have this day served the foregoing document: SUBPOENA TO LUCKY CAB
3 upon all parties of record in this proceeding by mailing a copy thereof, properly addressed, with
4 postage prepaid, to the below listed.

5 Dated at Las Vegas, NV, this ___ day of January of 2022.

6 **FOR A-CAB:**

7 Creighton J. Nady, Owner
8 A Cab, LLC
9 1500 Searles Ave.
10 Las Vegas, NV 89101

11 Esther C. Rodriguez, Esq.
12 Rodriguez Law Offices, P.C.
10161 Park Run Drive, Suite 150
13 Las Vegas, NV 89145

14 **FOR DESERT CAB:**

15 George Balaban
16 DESERT CAB COMPANY
4675 Wynn Road
17 Las Vegas, NV 89103

18 Robert A. Winner, Esq.
19 ROBERT WINNER, LTD
400 S. 4th Street, 3rd Floor
20 Las Vegas, NV 89101

21 **FOR LUCKY AND WESTERN CAB:**

22 Jason A. Awad, Esq.
23 Desiree Dante
4195 W. Diablo Dr.
24 Las Vegas, NV 89118

25 Ryan J. Awad, Esq.
26 JASON A. AWAD & ASSOC.
10801 W. Charleston Blvd, #575
27 Las Vegas, NV 89135
28

1 FOR WHITTLESEA BLUE/HENDERSON TAXI

2 Cheryl D. Gibbons, General Manager
3 WHITTLESEA BLUE/HENDERSON TAXI
4 And VIRGIN VALLEY CAB
5 1910 Industrial Road
6 Las Vegas, NV 89102

7 Mark E. Trafton, Esq.
8 WHITTLESEA BLUE/HENDERSON TAXI
9 1910 Industrial Road
10 Las Vegas, NV 89102

11 FOR YCS CORPS:

12 YELLOW CHECKER AND STAR CAB
13 CORPORATIONS
14 ATTN: Keith Gibson,
15 General Counsel
16 5225 W. Post Road
17 Las Vegas, NV 89118

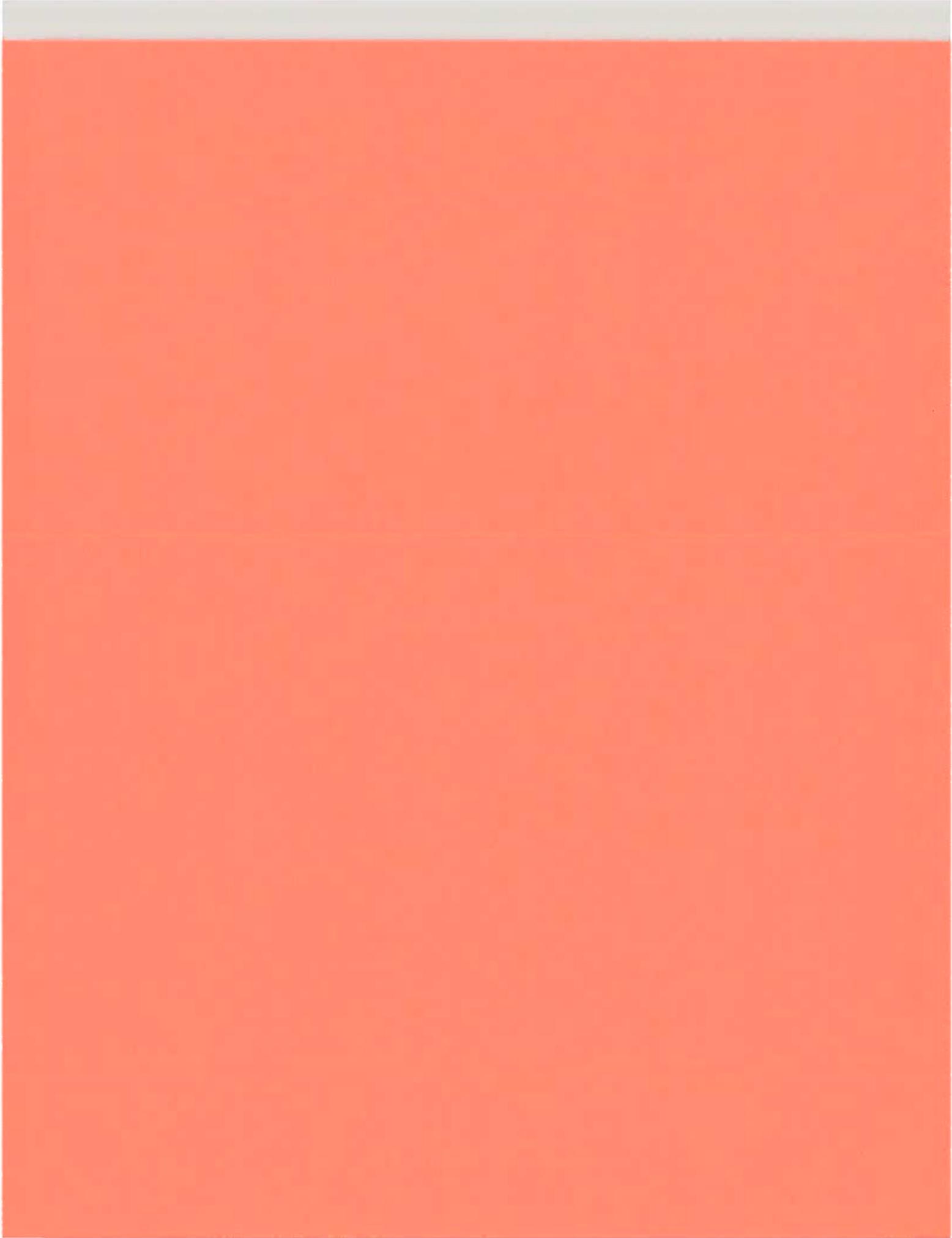
18 FOR THE STATE:

19 Asheesh Bhalla, Esq.
20 DEPUTY ATTORNEY GENERAL
21 555 E. Washington Ave., Suite 3900
22 Las Vegas, NV 89101

23 JD Decker, Interim Administrator
24 Nevada Taxicab Authority
25 2090 E. Flamingo Rd, Suite 200
26 Las Vegas, NV 89119

27 David Ricker, Esq.
28 NEVADA TAXICAB AUTHORITY
2090 E. Flamingo Rd, Suite 200
Las Vegas, NV 89119

An employee of Attorney Brent Carson



JAN 18 '22 FILED

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BRENT A. CARSON, ESQ.
Nevada Bar No. 5903
ATTORNEY BRENT CARSON, LLC.
bac@winnercarson.com
7935 W. Sahara Avenue, Suite 101
Las Vegas, Nevada 89117
Ph: (702) 471-1111
Fax: (702) 471-0110
Attorney for INDEPENDENT CAB COMPANY, LLC

BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY

In the matter of An Application for a certificate)
of Public Convenience and Necessity by)
Applicants, Brent A. Carson and Claudia Maria)
Hoepfner (Independent ab Company, LLC),)
And Request for Thirty-Five Taxicab)
Medallions.)

APPLICANT, INDEPENDENT CAB COMPANY'S APPLICATION PURSUANT TO NAC 706.936 FOR THE TAXICAB AUTHORITY TO APPROVE THE ISSUANCE OF THE ATTACHED SUBPOENA TO PRODUCE DOCUMENTS TO STAR CAB COMPANY

COMES NOW, Applicants BRENT A. CARSON and CLAUDIA MARIA HOEPPNER, by and through their attorney of record, Brent A. Carson, Esq. of the law firm of ATTORNEY BRENT CARSON, LLC., and submits this Application pursuant to NAC 706.936 in the above referenced matter. Independent Cab Company respectfully requests the Taxicab Authority issue the Subpoena attached to this Application, and identified as Exhibit "A." The attached Subpoena is in Compliance with NAC 706.936 and is reasonable and not oppressive. Independent Cab Company requests compliance with the attached Subpoena within ten (10) days of its issuance.

DATED this 15 Day of Jan, 2022.

ATTORNEY BRENT CARSON, LLC



BRENT A CARSON, ESQ.
Nevada Bar No. 5903
7935 W. Sahara Avenue, Suite 101
Las Vegas, Nevada 89117
Attorney for Independent Cab Company

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I have this day served the foregoing document: APPLICATION FOR
3 SUBPOENA TO STAR CAB COMPANY upon all parties of record in this proceeding by mailing a
4 copy thereof, properly addressed, with postage prepaid, to the below listed.

5 Dated at Las Vegas, NV, this ___ day of January of 2022.

6 **FOR A-CAB:**

7 Creighton J. Nady, Owner
8 A Cab, LLC
9 1500 Searles Ave.
Las Vegas, NV 89101

10 Esther C. Rodriguez, Esq.
11 Rodriguez Law Offices, P.C.
12 10161 Park Run Drive, Suite 150
Las Vegas, NV 89145

13 **FOR DESERT CAB:**

14 George Balaban
15 DESERT CAB COMPANY
16 4675 Wynn Road
Las Vegas, NV 89103

17 Robert A. Winner, Esq.
18 ROBERT WINNER, LTD
19 400 S. 4th Street, 3rd Floor
Las Vegas, NV 89101

20 **FOR LUCKY AND WESTERN CAB:**

21 Jason A. Awad, Esq.
22 Desiree Dante
23 4195 W. Diablo Dr.
Las Vegas, NV 89118

24 Ryan J. Awad, Esq.
25 JASON A. AWAD & ASSOC.
26 10801 W. Charleston Blvd, #575
Las Vegas, NV 89135

27

28

1 FOR WHITTLESEA BLUE/HENDERSON TAXI

2 Cheryl D. Gibbons, General Manager
3 WHITTLESEA BLUE/HENDERSON TAXI
4 And VIRGIN VALLEY CAB
5 1910 Industrial Road
6 Las Vegas, NV 89102

7 Mark E. Trafton, Esq.
8 WHITTLESEA BLUE/HENDERSON TAXI
9 1910 Industrial Road
10 Las Vegas, NV 89102

11 FOR YCS CORPS:

12 YELLOW CHECKER AND STAR CAB
13 CORPORATIONS
14 ATTN: Keith Gibson,
15 General Counsel
16 5225 W. Post Road
17 Las Vegas, NV 89118

18 FOR THE STATE:

19 Asheesh Bhalla, Esq.
20 DEPUTY ATTORNEY GENERAL
21 555 E. Washington Ave., Suite 3900
22 Las Vegas, NV 89101

23 JD Decker, Interim Administrator
24 Nevada Taxicab Authority
25 2090 E. Flamingo Rd, Suite 200
26 Las Vegas, NV 89119

27 David Ricker, Esq.
28 NEVADA TAXICAB AUTHORITY
2090 E. Flamingo Rd, Suite 200
Las Vegas, NV 89119

An employee of Attorney Brent Carson

EXHIBIT A

1 BRENT A. CARSON, ESQ.
2 Nevada Bar No. 5903
3 ATTORNEY BRENT CARSON, LLC.
4 bac@winnercarson.com
5 7935 W. Sahara Avenue, Suite 101
6 Las Vegas, Nevada 89117
7 Ph: (702) 471-1111
8 Fax: (702) 471-0110
9 Attorney for INDEPENDENT CAB COMPANY, LLC

10 **BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY**

11 In the matter of An Application for a certificate)
12 of Public Convenience and Necessity by)
13 Applicants, Brent A. Carson and Claudia Maria)
14 Hoeppner (Independent ab Company, LLC),)
15 And Request for Thirty-Five Taxicab)
16 Medallions.)

17 **SUBPOENA FOR DOCUMENT PRODCUTION TO STAR CAB**

18 TO: STAR CAB
19 TO: KEITH GIBSON, ESQ., their attorney

20 Pursuant to the Order of the Hearing Officer and the Application on file herein, and pursuant
21 to NAC 706.936, Independent Cab Company requests that the following documents subpoenaed be
22 produced by Intervenor within ten (10) days.

23 **ITEMS TO BE PRODUCED:**

- 24 1. Any and all documents, exhibits or other tangible items you intend to offer into evidence at the
25 hearing on Independent Cab Company's Application for a Certificate of Public Convenience
26 and Necessity.
27 2. Produce the Tax Returns for Star Cab for the past two years: 2019 and 2020.
28 3. Produce Star Cab's annual reports filed with the Nevada Taxicab Authority for the years 2019
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4. Produce any and all documents that support your contention that there is no need for any
additional taxicab medallions in Clark County.
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unreasonably and adversely affect your operations.

- 6. Produce any and all documents that support your contention that 35 additional medallions will not benefit the travelling public.
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DATED this 15 Day of Jan, 2022.

ATTORNEY BRENT CARSON, LLC



BRENT A CARSON, ESQ.
Nevada Bar No. 5903
7935 W. Sahara Avenue, Suite 101
Las Vegas, Nevada 89117
Attorney for Independent Cab Company

ISSUED AND APPROVED BY:

Nevada Taxicab Authority
J.D. Decker, Interim Administrator

Date: _____

1
2 **CERTIFICATE OF SERVICE**

3 I hereby certify that I have this day served the foregoing document: SUBPOENA TO STAR CAB
4 upon all parties of record in this proceeding by mailing a copy thereof, properly addressed, with
5 postage prepaid, to the below listed.

6 Dated at Las Vegas, NV, this ___ day of January of 2022.

7 **FOR A-CAB:**

8 Creighton J. Nady, Owner
9 A Cab, LLC
10 1500 Searles Ave.
11 Las Vegas, NV 89101

12 Esther C. Rodriquez, Esq.
13 Rodriquez Law Offices, P.C.
14 10161 Park Run Drive, Suite 150
15 Las Vegas, NV 89145

16 **FOR DESERT CAB:**

17 George Balaban
18 DESERT CAB COMPANY
19 4675 Wynn Road
20 Las Vegas, NV 89103

21 Robert A. Winner, Esq.
22 ROBERT WINNER, LTD
23 400 S. 4th Street, 3rd Floor
24 Las Vegas, NV 89101

25 **FOR LUCKY AND WESTERN CAB:**

26 Jason A. Awad, Esq.
27 Desiree Dante
28 4195 W. Diablo Dr.
Las Vegas, NV 89118

Ryan J. Awad, Esq.
JASON A. AWAD & ASSOC.
10801 W. Charleston Blvd, #575
Las Vegas, NV 89135

1 FOR WHITTLESEA BLUE/HENDERSON TAXI

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11 FOR YCS CORPS:

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15 General Counsel
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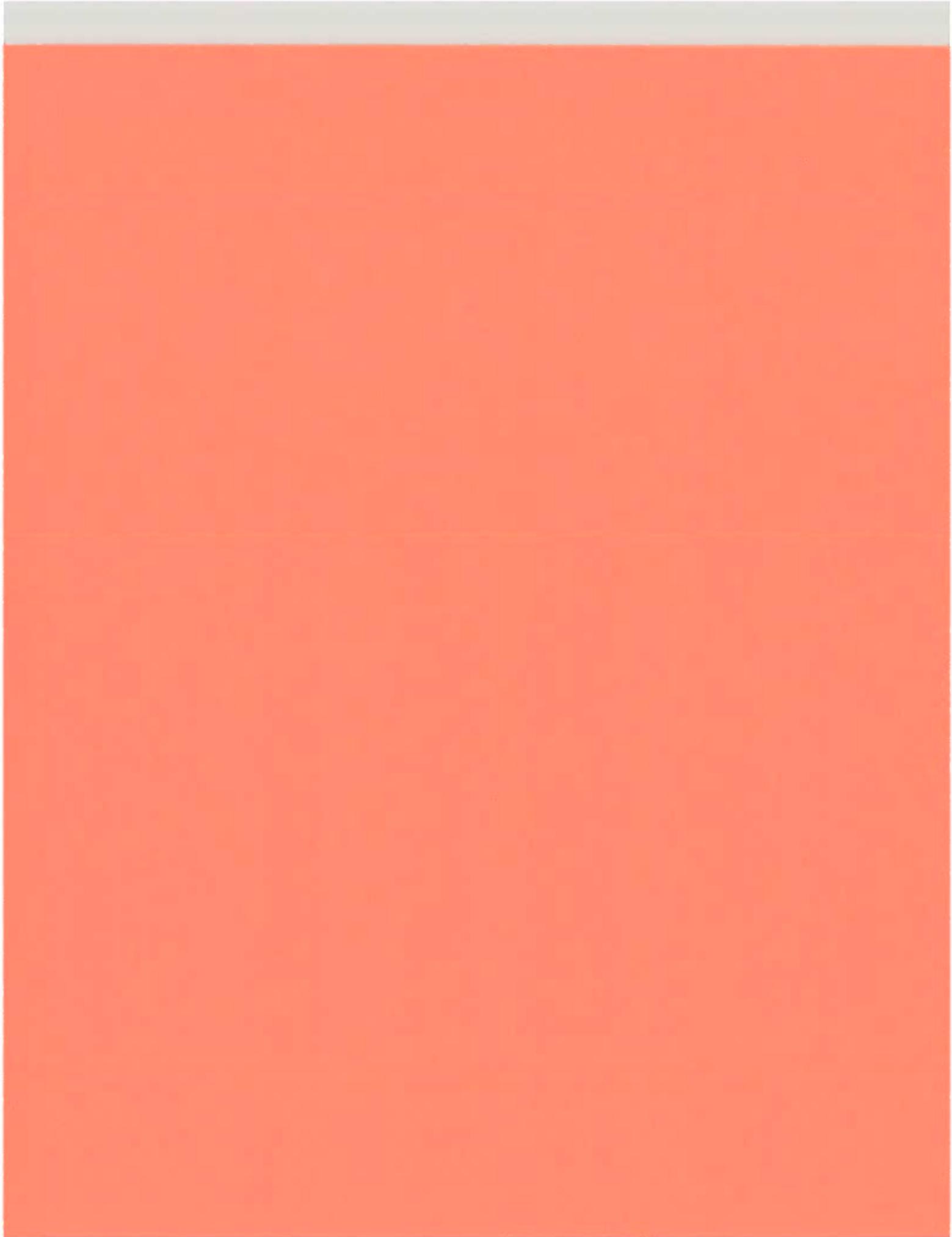
18 FOR THE STATE:

19 Asheesh Bhalla, Esq.
20 DEPUTY ATTORNEY GENERAL
21 555 E. Washington Ave., Suite 3900
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An employee of Attorney Brent Carson



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2 Nevada Bar No. 5903
3 ATTORNEY BRENT CARSON, LLC.
4 bac@winnercarson.com
5 7935 W. Sahara Avenue, Suite 101
6 Las Vegas, Nevada 89117
7 Ph: (702) 471-1111
8 Fax: (702) 471-0110
9 Attorney for INDEPENDENT CAB COMPANY, LLC

JAN 18 '22 FILED

6 BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY

7 In the matter of An Application for a certificate)
8 of Public Convenience and Necessity by)
9 Applicants, Brent A. Carson and Claudia Maria)
10 Hoepfner (Independent ab Company, LLC),)
11 And Request for Thirty-Five Taxicab)
12 Medallions.)

12 **APPLICANT, INDEPENDENT CAB COMPANY'S APPLICATION PURSUANT TO NAC**
13 **706.936 FOR THE TAXICAB AUTHORITY TO APPROVE THE ISSUANCE OF THE**
14 **ATTACHED SUBPOENA TO PRODUCE DOCUMENTS TO WESTERN CAB**

15 COMES NOW, Applicants BRENT A. CARSON and CLAUDIA MARIA HOEPPNER, by
16 and through their attorney of record, Brent A. Carson, Esq. of the law firm of ATTORNEY BRENT
17 CARSON, LLC., and submits this Application pursuant to NAC 706.936 in the above referenced
18 matter. Independent Cab Company respectfully requests the Taxicab Authority issue the Subpoena
19 attached to this Application, and identified as Exhibit "A." The attached Subpoena is in Compliance
20 with NAC 706.936 and is reasonable and not oppressive. Independent Cab Company requests
21 compliance with the attached Subpoena within ten (10) days of its issuance.

22 DATED this 15 Day of Jun, 2022.

24 ATTORNEY BRENT CARSON, LLC



25 BRENT A. CARSON, ESQ.
26 Nevada Bar No. 5903
27 7935 W. Sahara Avenue, Suite 101
28 Las Vegas, Nevada 89117
Attorney for Independent Cab Company

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3 SUBPOENA TO WESTERN CAB upon all parties of record in this proceeding by mailing a copy
4 thereof, properly addressed, with postage prepaid, to the below listed.

5 Dated at Las Vegas, NV, this ___ day of January of 2022.

6 FOR A-CAB:

7 Creighton J. Nady, Owner
8 A Cab, LLC
9 1500 Searles Ave.
10 Las Vegas, NV 89101

11 Esther C. Rodriguez, Esq.
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20 Las Vegas, NV 89101

21 FOR LUCKY AND WESTERN CAB:

22 Jason A. Awad, Esq.
23 Desiree Dante
4195 W. Diablo Dr.
24 Las Vegas, NV 89118

25 Ryan J. Awad, Esq.
26 JASON A. AWAD & ASSOC.
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4 And VIRGIN VALLEY CAB
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8 WHITTLESEA BLUE/HENDERSON TAXI
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11 FOR YCS CORPS:

12 YELLOW CHECKER AND STAR CAB
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14 ATTN: Keith Gibson,
15 General Counsel
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17 Las Vegas, NV 89118

18 FOR THE STATE:

19 Asheesh Bhalla, Esq.
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28 NEVADA TAXICAB AUTHORITY
2090 E. Flamingo Rd, Suite 200
Las Vegas, NV 89119

An employee of Attorney Brent Carson

EXHIBIT A

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Nevada Bar No. 5903
2 ATTORNEY BRENT CARSON, LLC.
bac@winnercarson.com
3 7935 W. Sahara Avenue, Suite 101
Las Vegas, Nevada 89117
4 Ph: (702) 471-1111
Fax: (702) 471-0110
5 Attorney for INDEPENDENT CAB COMPANY, LLC

6 **BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY**

7 In the matter of An Application for a certificate)
8 of Public Convenience and Necessity by)
9 Applicants, Brent A. Carson and Claudia Maria)
10 Hoepfner (Independent ab Company, LLC),)
And Request for Thirty-Five Taxicab)
11 Medallions.)

12 **SUBPOENA FOR DOCUMENT PRODCUTION TO WESTERN CAB**

13 TO: WESTERN CAB
14 TO: RYAN AWAD, ESQ., their attorney

15 Pursuant to the Order of the Hearing Officer and the Application on file herein, and pursuant
16 to NAC 706.936, Independent Cab Company requests that the following documents subpoenaed be
17 produced by Intervenor within ten (10) days.
18

19 **ITEMS TO BE PRODUCED:**

- 20 1. Any and all documents, exhibits or other tangible items you intend to offer into evidence at the
21 hearing on Independent Cab Company's Application for a Certificate of Public Convenience
22 and Necessity.
23 2. Produce the Tax Returns for Western Cab for the past two years: 2019 and 2020.
24 3. Produce Western Cab's annual reports filed with the Nevada Taxicab Authority for the years
25 2019 and 2020.
26 4. Produce any and all documents that support your contention that there is no need for any
27 additional taxicab medallions in Clark County.
28 5. Produce any and all documents that support your contention that 35 additional medallions will

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unreasonably and adversely affect your operations.

- 6. Produce any and all documents that support your contention that 35 additional medallions will not benefit the travelling public.
- 7. Produce any and all documents that Applicants are not fit to perform the services of a taxicab motor carrier.
- 8. Produce any and all documents that Applicants are not willing to perform the services of a taxicab motor carrier.
- 9. Produce any and all documents that Applicants are not able to perform the services of a taxicab motor carrier.

DATED this 15 Day of Jun, 2022.

ATTORNEY BRENT CARSON, LLC



BRENT A CARSON, ESQ.
Nevada Bar No. 5903
7935 W. Sahara Avenue, Suite 101
Las Vegas, Nevada 89117
Attorney for Independent Cab Company

ISSUED AND APPROVED BY:

Nevada Taxicab Authority
J.D. Decker, Interim Administrator

Date: _____

1
2 **CERTIFICATE OF SERVICE**

3 I hereby certify that I have this day served the foregoing document: SUBPOENA TO WESTERN
4 CAB upon all parties of record in this proceeding by mailing a copy thereof, properly addressed, with
5 postage prepaid, to the below listed.

6 Dated at Las Vegas, NV, this ___ day of January of 2022.

7
8 **FOR A-CAB:**

9 Creighton J. Nady, Owner
10 A Cab, LLC
11 1500 Searles Ave.
12 Las Vegas, NV 89101

13 Esther C. Rodriquez, Esq.
14 Rodriquez Law Offices, P.C.
15 10161 Park Run Drive, Suite 150
16 Las Vegas, NV 89145

17
18 **FOR DESERT CAB:**

19 George Balaban
20 DESERT CAB COMPANY
21 4675 Wynn Road
22 Las Vegas, NV 89103

23 Robert A. Winner, Esq.
24 ROBERT WINNER, LTD
25 400 S. 4th Street, 3rd Floor
26 Las Vegas, NV 89101

27
28 **FOR LUCKY AND WESTERN CAB:**

Jason A. Awad, Esq.
Desiree Dante
4195 W. Diablo Dr.
Las Vegas, NV 89118

Ryan J. Awad, Esq.
JASON A. AWAD & ASSOC.
10801 W. Charleston Blvd, #575
Las Vegas, NV 89135

1 FOR WHITTLESEA BLUE/HENDERSON TAXI

2 Cheryl D. Gibbons, General Manager
3 WHITTLESEA BLUE/HENDERSON TAXI
4 And VIRGIN VALLEY CAB
5 1910 Industrial Road
6 Las Vegas, NV 89102

7 Mark E. Trafton, Esq.
8 WHITTLESEA BLUE/HENDERSON TAXI
9 1910 Industrial Road
10 Las Vegas, NV 89102

11 FOR YCS CORPS:

12 YELLOW CHECKER AND STAR CAB
13 CORPORATIONS
14 ATTN: Keith Gibson,
15 General Counsel
16 5225 W. Post Road
17 Las Vegas, NV 89118

18 FOR THE STATE:

19 Asheesh Bhalla, Esq.
20 DEPUTY ATTORNEY GENERAL
21 555 E. Washington Ave., Suite 3900
22 Las Vegas, NV 89101

23 JD Decker, Interim Administrator
24 Nevada Taxicab Authority
25 2090 E. Flamingo Rd, Suite 200
26 Las Vegas, NV 89119

27 David Ricker, Esq.
28 NEVADA TAXICAB AUTHORITY
29 2090 E. Flamingo Rd, Suite 200
30 Las Vegas, NV 89119

An employee of Attorney Brent Carson

JAN 18 2022 FILED

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BRENT A. CARSON, ESQ.
Nevada Bar No. 5903
ATTORNEY BRENT CARSON, LLC.
bac@winnercarson.com
7935 W. Sahara Avenue, Suite 101
Las Vegas, Nevada 89117
Ph: (702) 471-1111
Fax: (702) 471-0110
Attorney for INDEPENDENT CAB COMPANY, LLC

BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY

In the matter of An Application for a certificate)
of Public Convenience and Necessity by)
Applicants, Brent A. Carson and Claudia Maria)
Hoeppner (Independent ab Company, LLC),)
And Request for Thirty-Five Taxicab)
Medallions.)

APPLICANT, INDEPENDENT CAB COMPANY'S APPLICATION PURSUANT TO NAC 706.936 FOR THE TAXICAB AUTHORITY TO APPROVE THE ISSUANCE OF THE ATTACHED SUBPOENA TO PRODUCE DOCUMENTS TO WHITTLSEA BLUE CAB

COMES NOW, Applicants BRENT A. CARSON and CLAUDIA MARIA HOEPPNER, by and through their attorney of record, Brent A. Carson, Esq. of the law firm of ATTORNEY BRENT CARSON, LLC., and submits this Application pursuant to NAC 706.936 in the above referenced matter. Independent Cab Company respectfully requests the Taxicab Authority issue the Subpoena attached to this Application, and identified as Exhibit "A." The attached Subpoena is in Compliance with NAC 706.936 and is reasonable and not oppressive. Independent Cab Company requests compliance with the attached Subpoena within ten (10) days of its issuance.

DATED this 15 Day of Jan, 2022.

ATTORNEY BRENT CARSON, LLC

BRENT A. CARSON, ESQ.
Nevada Bar No. 5903
7935 W. Sahara Avenue, Suite 101
Las Vegas, Nevada 89117
Attorney for Independent Cab Company

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I have this day served the foregoing document: APPLICATION FOR
3 SUBPOENA TO WHITTLESEA BLUE CAB upon all parties of record in this proceeding by mailing
4 a copy thereof, properly addressed, with postage prepaid, to the below listed.

5 Dated at Las Vegas, NV, this ___ day of January of 2022.

6 FOR A-CAB:

7 Creighton J. Nady, Owner
8 A Cab, LLC
9 1500 Searles Ave.
Las Vegas, NV 89101

10 Esther C. Rodriquez, Esq.
11 Rodriquez Law Offices, P.C.
12 10161 Park Run Drive, Suite 150
Las Vegas, NV 89145

13 FOR DESERT CAB:

14 George Balaban
15 DESERT CAB COMPANY
16 4675 Wynn Road
Las Vegas, NV 89103

17 Robert A. Winner, Esq.
18 ROBERT WINNER, LTD
19 400 S. 4th Street, 3rd Floor
Las Vegas, NV 89101

20 FOR LUCKY AND WESTERN CAB:

21 Jason A. Awad, Esq.
22 Desiree Dante
23 4195 W. Diablo Dr.
Las Vegas, NV 89118

24 Ryan J. Awad, Esq.
25 JASON A. AWAD & ASSOC.
26 10801 W. Charleston Blvd, #575
Las Vegas, NV 89135

27
28

1 FOR WHITTLESEA BLUE/HENDERSON TAXI

2 Cheryl D. Gibbons, General Manager
3 WHITTLESEA BLUE/HENDERSON TAXI
4 And VIRGIN VALLEY CAB
5 1910 Industrial Road
6 Las Vegas, NV 89102

7 Mark E. Trafton, Esq.
8 WHITTLESEA BLUE/HENDERSON TAXI
9 1910 Industrial Road
10 Las Vegas, NV 89102

11 FOR YCS CORPS:

12 YELLOW CHECKER AND STAR CAB
13 CORPORATIONS
14 ATTN: Keith Gibson,
15 General Counsel
16 5225 W. Post Road
17 Las Vegas, NV 89118

18 FOR THE STATE:

19 Asheesh Bhalla, Esq.
20 DEPUTY ATTORNEY GENERAL
21 555 E. Washington Ave., Suite 3900
22 Las Vegas, NV 89101

23 JD Decker, Interim Administrator
24 Nevada Taxicab Authority
25 2090 E. Flamingo Rd, Suite 200
26 Las Vegas, NV 89119

27 David Ricker, Esq.
28 NEVADA TAXICAB AUTHORITY
29 2090 E. Flamingo Rd, Suite 200
30 Las Vegas, NV 89119

An employee of Attorney Brent Carson

EXHIBIT A

1 BRENT A. CARSON, ESQ.
Nevada Bar No. 5903
2 ATTORNEY BRENT CARSON, LLC.
bac@winnercarson.com
3 7935 W. Sahara Avenue, Suite 101
Las Vegas, Nevada 89117
4 Ph: (702) 471-1111
Fax: (702) 471-0110
5 Attorney for INDEPENDENT CAB COMPANY, LLC

6 **BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY**

7 In the matter of An Application for a certificate)
8 of Public Convenience and Necessity by)
Applicants, Brent A. Carson and Claudia Maria)
9 Hoepfner (Independent ab Company, LLC),)
10 And Request for Thirty-Five Taxicab)
Medallions.)

12 **SUBPOENA FOR DOCUMENT PRODCUTION TO WHITTLESEA BLUE CAB**

13 TO: WHITTLESEA BLUE CAB

14 TO: MARK TRAFTON, ESQ., their attorney

15 Pursuant to the Order of the Hearing Officer and the Application on file herein, and pursuant
16 to NAC 706.936, Independent Cab Company requests that the following documents subpoenaed be
17 produced by Intervenor within ten (10) days.

18 **ITEMS TO BE PRODUCED:**

- 19
- 20 1. Any and all documents, exhibits or other tangible items you intend to offer into evidence at the
21 hearing on Independent Cab Company's Application for a Certificate of Public Convenience
22 and Necessity.
 - 23 2. Produce the Tax Returns for Whittlesea Blue Cab Company for the past two years: 2019 and
24 2020.
 - 25 3. Produce Whittlesea Blue Cab Company's annual reports filed with the Nevada Taxicab
26 Authority for the years 2019 and 2020.
 - 27 4. Produce any and all documents that support your contention that there is no need for any
28 additional taxicab medallions in Clark County.

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- 5. Produce any and all documents that support your contention that 35 additional medallions will unreasonably and adversely affect your operations.
- 6. Produce any and all documents that support your contention that 35 additional medallions will not benefit the travelling public.
- 7. Produce any and all documents that Applicants are not fit to perform the services of a taxicab motor carrier.
- 8. Produce any and all documents that Applicants are not willing to perform the services of a taxicab motor carrier.
- 9. Produce any and all documents that Applicants are not able to perform the services of a taxicab motor carrier.

DATED this 5 Day of Jan, 2022.

ATTORNEY BRENT CARSON, LLC

BRENT A CARSON, ESQ.
Nevada Bar No. 5903
7935 W. Sahara Avenue, Suite 101
Las Vegas, Nevada 89117
Attorney for Independent Cab Company

ISSUED AND APPROVED BY:

Nevada Taxicab Authority
J.D. Decker, Interim Administrator

Date: _____

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document: SUBPOENA TO WHITTLSEA BLUE CAB upon all parties of record in this proceeding by mailing a copy thereof, properly addressed, with postage prepaid, to the below listed.

Dated at Las Vegas, NV, this ___ day of January of 2022.

FOR A-CAB:

Creighton J. Nady, Owner
A Cab, LLC
1500 Searles Ave.
Las Vegas, NV 89101

Esther C. Rodriguez, Esq.
Rodriquez Law Offices, P.C.
10161 Park Run Drive, Suite 150
Las Vegas, NV 89145

FOR DESERT CAB:

George Balaban
DESERT CAB COMPANY
4675 Wynn Road
Las Vegas, NV 89103

Robert A. Winner, Esq.
ROBERT WINNER, LTD
400 S. 4th Street, 3rd Floor
Las Vegas, NV 89101

FOR LUCKY AND WESTERN CAB:

Jason A. Awad, Esq.
Desiree Dante
4195 W. Diablo Dr.
Las Vegas, NV 89118

Ryan J. Awad, Esq.
JASON A. AWAD & ASSOC.
10801 W. Charleston Blvd, #575
Las Vegas, NV 89135

1 FOR WHITTLESEA BLUE/HENDERSON TAXI

2 Cheryl D. Gibbons, General Manager
3 WHITTLESEA BLUE/HENDERSON TAXI
4 And VIRGIN VALLEY CAB
5 1910 Industrial Road
6 Las Vegas, NV 89102

6 Mark E. Trafton, Esq.
7 WHITTLESEA BLUE/HENDERSON TAXI
8 1910 Industrial Road
9 Las Vegas, NV 89102

9 FOR YCS CORPS:

10 YELLOW CHECKER AND STAR CAB
11 CORPORATIONS
12 ATTN: Keith Gibson,
13 General Counsel
14 5225 W. Post Road
15 Las Vegas, NV 89118

14 FOR THE STATE:

15 Asheesh Bhalla, Esq.
16 DEPUTY ATTORNEY GENERAL
17 555 E. Washington Ave., Suite 3900
18 Las Vegas, NV 89101

18 JD Decker, Interim Administrator
19 Nevada Taxicab Authority
20 2090 E. Flamingo Rd, Suite 200
21 Las Vegas, NV 89119

21 David Ricker, Esq.
22 NEVADA TAXICAB AUTHORITY
23 2090 E. Flamingo Rd, Suite 200
24 Las Vegas, NV 89119

24

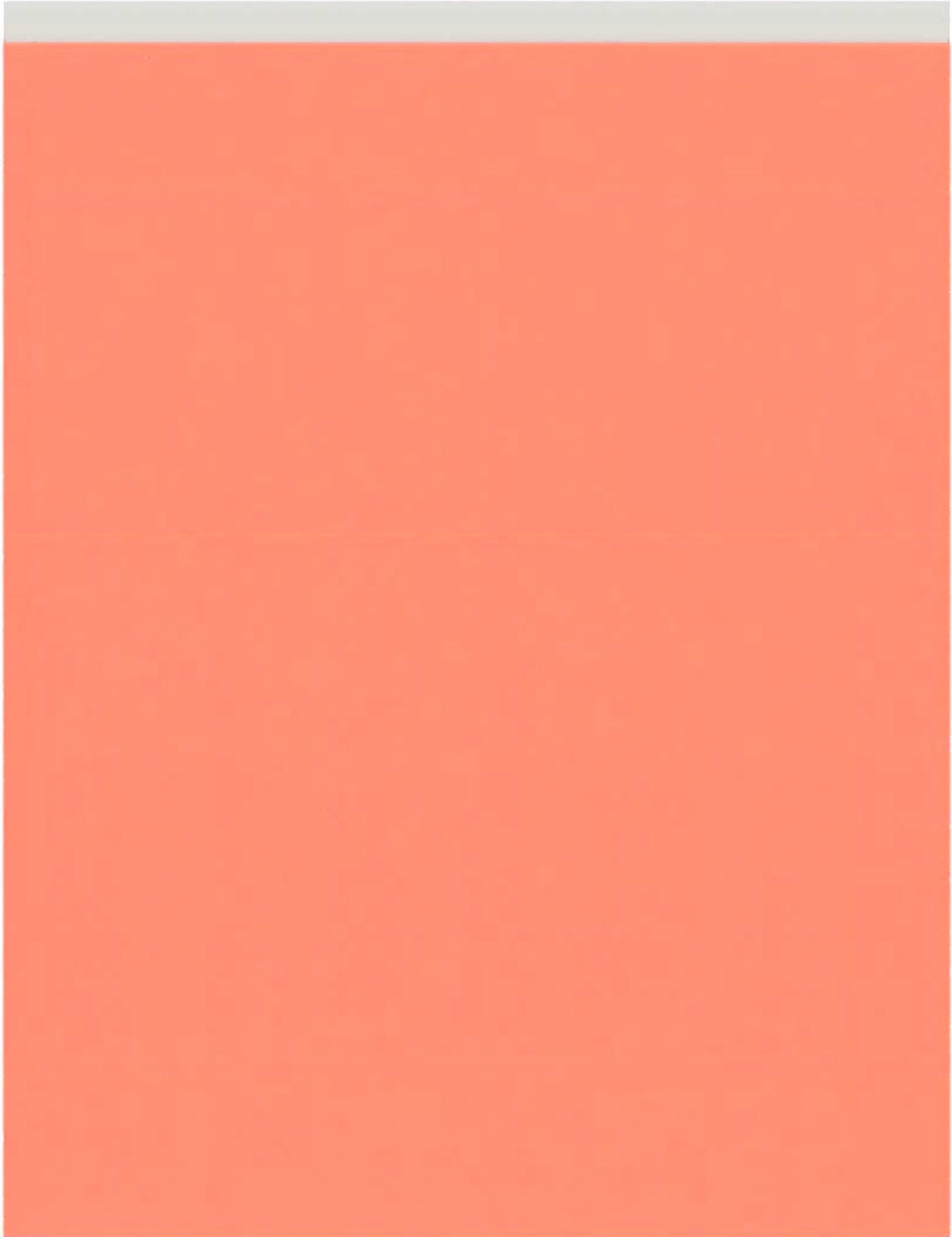
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28

An employee of Attorney Brent Carson



1 BRENT A. CARSON, ESQ.
2 Nevada Bar No. 5903
3 ATTORNEY BRENT CARSON, LLC.
4 bac@winnercarson.com
5 7935 W. Sahara Avenue, Suite 101
6 Las Vegas, Nevada 89117
7 Ph: (702) 471-1111
8 Fax: (702) 471-0110
9 Attorney for INDEPENDENT CAB COMPANY, LLC

JAN 18 '22 FILED

6 **BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY**

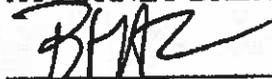
7 In the matter of An Application for a certificate)
8 of Public Convenience and Necessity by)
9 Applicants, Brent A. Carson and Claudia Maria)
10 Hoepfner (Independent ab Company, LLC),)
11 And Request for Thirty-Five Taxicab)
12 Medallions.)

12 **APPLICANT, INDEPENDENT CAB COMPANY'S APPLICATION PURSUANT TO NAC**
13 **706.936 FOR THE TAXICAB AUTHORITY TO APPROVE THE ISSUANCE OF THE**
14 **ATTACHED SUBPOENA TO PRODUCE DOCUMENTS TO YELLOW CAB COMPANY**

15 COMES NOW, Applicants BRENT A. CARSON and CLAUDIA MARIA HOEPPNER, by
16 and through their attorney of record, Brent A. Carson, Esq. of the law firm of ATTORNEY BRENT
17 CARSON, LLC., and submits this Application pursuant to NAC 706.936 in the above referenced
18 matter. Independent Cab Company respectfully requests the Taxicab Authority issue the Subpoena
19 attached to this Application, and identified as Exhibit "A." The attached Subpoena is in Compliance
20 with NAC 706.936 and is reasonable and not oppressive. Independent Cab Company requests
21 compliance with the attached Subpoena within ten (10) days of its issuance.

22 DATED this 15 Day of Jan, 2022.

24 ATTORNEY BRENT CARSON, LLC

25 

26 BRENT A. CARSON, ESQ.
27 Nevada Bar No. 5903
28 7935 W. Sahara Avenue, Suite 101
Las Vegas, Nevada 89117
Attorney for Independent Cab Company

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I have this day served the foregoing document: APPLICATION FOR
3 SUBPOENA TO YELLOW CAB COMPANY upon all parties of record in this proceeding by mailing
4 a copy thereof, properly addressed, with postage prepaid, to the below listed.

5 Dated at Las Vegas, NV, this ___ day of January of 2022.

6 **FOR A-CAB:**

7 Creighton J. Nady, Owner
8 A Cab, LLC
9 1500 Searles Ave.
10 Las Vegas, NV 89101

11 Esther C. Rodriquez, Esq.
12 Rodriquez Law Offices, P.C.
13 10161 Park Run Drive, Suite 150
14 Las Vegas, NV 89145

15 **FOR DESERT CAB:**

16 George Balaban
17 DESERT CAB COMPANY
18 4675 Wynn Road
19 Las Vegas, NV 89103

20 Robert A. Winner, Esq.
21 ROBERT WINNER, LTD
22 400 S. 4th Street, 3rd Floor
23 Las Vegas, NV 89101

24 **FOR LUCKY AND WESTERN CAB:**

25 Jason A. Awad, Esq.
26 Desiree Dante
27 4195 W. Diablo Dr.
28 Las Vegas, NV 89118

Ryan J. Awad, Esq.
JASON A. AWAD & ASSOC.
10801 W. Charleston Blvd, #575
Las Vegas, NV 89135

1 FOR WHITTLESEA BLUE/HENDERSON TAXI

2 Cheryl D. Gibbons, General Manager
3 WHITTLESEA BLUE/HENDERSON TAXI
4 And VIRGIN VALLEY CAB
5 1910 Industrial Road
6 Las Vegas, NV 89102

7 Mark E. Trafton, Esq.
8 WHITTLESEA BLUE/HENDERSON TAXI
9 1910 Industrial Road
10 Las Vegas, NV 89102

11 FOR YCS CORPS:

12 YELLOW CHECKER AND STAR CAB
13 CORPORATIONS
14 ATTN: Keith Gibson,
15 General Counsel
16 5225 W. Post Road
17 Las Vegas, NV 89118

18 FOR THE STATE:

19 Asheesh Bhalla, Esq.
20 DEPUTY ATTORNEY GENERAL
21 555 E. Washington Ave., Suite 3900
22 Las Vegas, NV 89101

23 JD Decker, Interim Administrator
24 Nevada Taxicab Authority
25 2090 E. Flamingo Rd, Suite 200
26 Las Vegas, NV 89119

27 David Ricker, Esq.
28 NEVADA TAXICAB AUTHORITY
29 2090 E. Flamingo Rd, Suite 200
30 Las Vegas, NV 89119

An employee of Attorney Brent Carson

EXHIBIT A

1 BRENT A. CARSON, ESQ.
Nevada Bar No. 5903
2 ATTORNEY BRENT CARSON, LLC.
bac@winnercarson.com
3 7935 W. Sahara Avenue, Suite 101
Las Vegas, Nevada 89117
4 Ph: (702) 471-1111
Fax: (702) 471-0110
5 Attorney for INDEPENDENT CAB COMPANY, LLC

6 **BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY**

7 In the matter of An Application for a certificate)
8 of Public Convenience and Necessity by)
Applicants, Brent A. Carson and Claudia Maria)
9 Hoepfner (Independent ab Company, LLC),)
10 And Request for Thirty-Five Taxicab)
Medallions.)

11 _____
12 **SUBPOENA FOR DOCUMENT PRODCUTION TO YELLOW CAB**

13 TO: YELLOW CAB
14 TO: KEITH GIBSON, ESQ., their attorney

15 Pursuant to the Order of the Hearing Officer and the Application on file herein, and pursuant
16 to NAC 706.936, Independent Cab Company requests that the following documents subpoenaed be
17 produced by Intervenor within ten (10) days.

18 **ITEMS TO BE PRODUCED:**

- 19
- 20 1. Any and all documents, exhibits or other tangible items you intend to offer into evidence at the
21 hearing on Independent Cab Company's Application for a Certificate of Public Convenience
22 and Necessity.
 - 23 2. Produce the Tax Returns for Yellow Cab for the past two years: 2019 and 2020.
 - 24 3. Produce Yellow Cab's annual reports filed with the Nevada Taxicab Authority for the years
25 2019 and 2020.
 - 26 4. Produce any and all documents that support your contention that there is no need for any
27 additional taxicab medallions in Clark County.
 - 28 5. Produce any and all documents that support your contention that 35 additional medallions will

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6. Produce any and all documents that support your contention that 35 additional medallions will not benefit the travelling public.
7. Produce any and all documents that Applicants are not fit to perform the services of a taxicab motor carrier.
8. Produce any and all documents that Applicants are not willing to perform the services of a taxicab motor carrier.
9. Produce any and all documents that Applicants are not able to perform the services of a taxicab motor carrier.

DATED this 15 Day of Jan, 2022.

ATTORNEY BRENT CARSON, LLC



BRENT A CARSON, ESQ.
Nevada Bar No. 5903
7935 W. Sahara Avenue, Suite 101
Las Vegas, Nevada 89117
Attorney for Independent Cab Company

ISSUED AND APPROVED BY:

Nevada Taxicab Authority
J.D. Decker, Interim Administrator

Date: _____

1
2 **CERTIFICATE OF SERVICE**

3 I hereby certify that I have this day served the foregoing document: SUBPOENA TO YELLOW CAB
4 upon all parties of record in this proceeding by mailing a copy thereof, properly addressed, with
5 postage prepaid, to the below listed.

6 Dated at Las Vegas, NV, this ___ day of January of 2022.

7
8 **FOR A-CAB:**

9 Creighton J. Nady, Owner
10 A Cab, LLC
11 1500 Searles Ave.
12 Las Vegas, NV 89101

13 Esther C. Rodriquez, Esq.
14 Rodriquez Law Offices, P.C.
15 10161 Park Run Drive, Suite 150
16 Las Vegas, NV 89145

17
18 **FOR DESERT CAB:**

19 George Balaban
20 DESERT CAB COMPANY
21 4675 Wynn Road
22 Las Vegas, NV 89103

23 Robert A. Winner, Esq.
24 ROBERT WINNER, LTD
25 400 S. 4th Street, 3rd Floor
26 Las Vegas, NV 89101

27
28 **FOR LUCKY AND WESTERN CAB:**

Jason A. Awad, Esq.
Desiree Dante
4195 W. Diablo Dr.
Las Vegas, NV 89118

Ryan J. Awad, Esq.
JASON A. AWAD & ASSOC.
10801 W. Charleston Blvd, #575
Las Vegas, NV 89135

1 FOR WHITTLESEA BLUE/HENDERSON TAXI

2 Cheryl D. Gibbons, General Manager
3 WHITTLESEA BLUE/HENDERSON TAXI
4 And VIRGIN VALLEY CAB
5 1910 Industrial Road
6 Las Vegas, NV 89102

7 Mark E. Trafton, Esq.
8 WHITTLESEA BLUE/HENDERSON TAXI
9 1910 Industrial Road
10 Las Vegas, NV 89102

11 FOR YCS CORPS:

12 YELLOW CHECKER AND STAR CAB
13 CORPORATIONS
14 ATTN: Keith Gibson,
15 General Counsel
16 5225 W. Post Road
17 Las Vegas, NV 89118

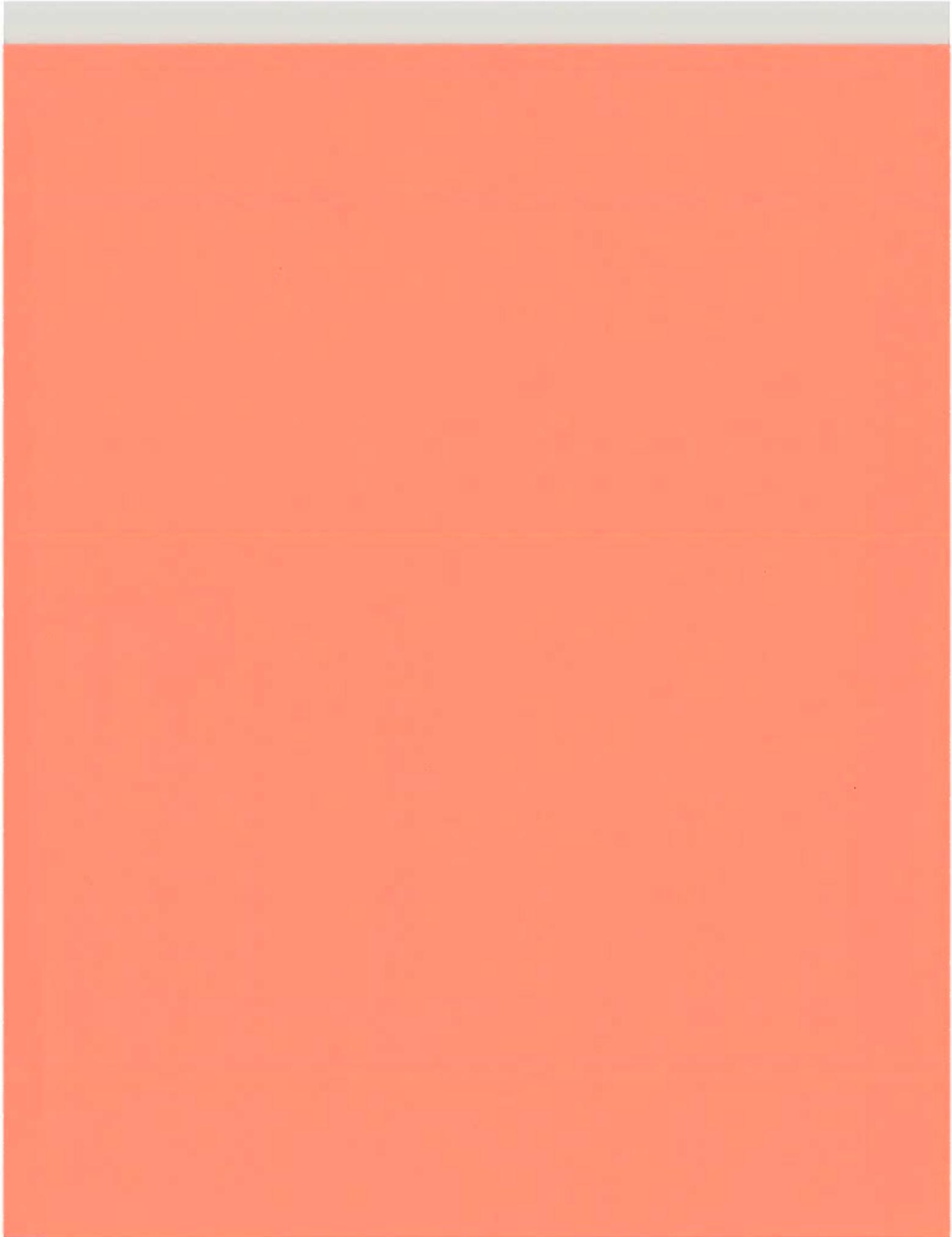
18 FOR THE STATE:

19 Asheesh Bhalla, Esq.
20 DEPUTY ATTORNEY GENERAL
21 555 E. Washington Ave., Suite 3900
22 Las Vegas, NV 89101

23 JD Decker, Interim Administrator
24 Nevada Taxicab Authority
25 2090 E. Flamingo Rd, Suite 200
26 Las Vegas, NV 89119

27 David Ricker, Esq.
28 NEVADA TAXICAB AUTHORITY
2090 E. Flamingo Rd, Suite 200
Las Vegas, NV 89119

An employee of Attorney Brent Carson



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BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY

In the matter of an application for a certificate of public convenience and necessity by applicants Brent Carson and Claudia Maria Hoepfner (Independent Cab Company, LLC), and request for thirty-five taxicab medallions.

Prehearing Conference - December 22, 2021

ORDER

DEC 23 '21 FILED

Based on the proceedings occurring at open hearing on December 22, 2021, the filings of the parties and arguments presented, IT IS HEREBY ORDERED:

- 1) The final hearing in this matter is CONTINUED until February 15, 2022 or thereafter, to be set by the Taxicab Authority.
- 2) A prehearing conference will be set for approximately 2 weeks prior to the final hearing, to address any outstanding issues and to address the issues contained in NAC 706.933.
- 4) Intervenors shall amend their answers to Applicant's interrogatories on or by January 3, 2022.
- 5) Applicant shall produce any documents upon which their expert witness relied, beyond those identified in the previously produced exhibit list, on or by January 3, 2022. The deposition of Applicant's expert shall take place on January 5, 2022 unless otherwise agreed by the parties.
- 6) Applicant shall produce the tax return and financial information in the Application, as redacted by the Taxicab Authority, once that redaction has been finalized. The biographical information of the Applicant's principals shall remain confidential.

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EXHIBIT 1

CERTIFICATE OF MAILING

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I, Nancy Alva, do hereby certify that I deposited in the U.S. mail,

postage prepaid, via First Class Mail and Certified Return receipt Requested, a true and correct copy of the foregoing Findings of Fact, Conclusions of Law, and Order to the following:

Whittlesea – Henderson
ATTN: Brent Bell
1910 Industrial Road
Las Vegas, NV 89102

Lucky Cab
ATTN: Jason Awad
4195 W. Diablo
Las Vegas, NV 89103

Whittlesea – Henderson
ATTN: Cheryl Gibbons
1910 Industrial Road
Las Vegas, NV 89102

Lucky Cab
ATTN: Ryan Awad
4195 W. Diablo
Las Vegas, NV 89103

Whittlesea – Henderson
ATTN: Mark Trafton
1910 Industrial Road
Las Vegas, NV 89102

Deluxe
ATTN: Rich Flaven
P.O. Box 531787
Henderson, NV 89053-1787

Cooper Levenson Law Firm
ATTN: Kimberly Maxson-Rushton
3016 W. Charleston Blvd., Suite 195
Las Vegas, NV 89102

Jim Jimmerson
415 S. 6th Street, Suite 100
Las Vegas, NV 89101

Western Cab
ATTN: Marilyn Moran
4195 W. Diablo
Las Vegas, NV 89103

A Cab
ATTN: Jay Nady
1500 Searles Avenue
Las Vegas, NV 89101

Western Cab
ATTN: John Moran
4195 W. Diablo
Las Vegas, NV 89103

A Cab
ATTN: Mike Malloy
1500 Searles Avenue
Las Vegas, NV 89101

Lucky/Western
ATTN: Desiree Dante
4195 W. Diablo
Las Vegas, NV 89103

ITPEU/OPEIU LOCAL
ATTN: Mike Kilgo
4480 W. Hacienda Ave., Suite 110
Las Vegas, NV 89118

Lucky/Western
ATTN: Donald Chan
4195 W. Diablo
Las Vegas, NV 89103

Robert Winner Esq.
4675 Wynn Road
Las Vegas, NV 89103

1 Desert Cab
ATTN: Rich Frakes
2 4675 Wynn Road
Las Vegas, NV 89103

Yellow Checker Star
ATTN: Keith Gibson
5225 W. Post Road
Las Vegas, NV 89118

3 Desert Cab
4 ATTN: George Balaban
4675 Wynn Road
5 Las Vegas, NV 89103

KAPTYN
ATTN: Andrew Meyers
4675 S. Wynn Road
Las Vegas, NV 89103

6 Nellis Cab
7 ATTN: Michelle Langille
5490 Cameron Street
8 Las Vegas, NV 89119

KAPTYN
ATTN: Jim Morgan
4675 S. Wynn Road
Las Vegas, NV 89103

9 Nellis Cab
10 ATTN: Jamie Pino
5490 Cameron Street
11 Las Vegas, NV 89119

KAPTYN
ATTN: Michael Morrison
4675 S. Wynn Road
Las Vegas, NV 89103

12 Esther Rodriguez Esq.
10161 Park Run Drive, Suite 150
13 Las Vegas, NV 89145

KAPTYN
ATTN: Chris Bordonaro
4675 S. Wynn Road
Las Vegas, NV 89103

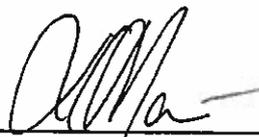
14 Yellow Checker Star
ATTN: Mike Rawlings
15 5225 W. Post Road
16 Las Vegas, NV 89118

Independent Cab Inc.
ATTN: Brent Carson
7935 W. Sahara Ave., Suite 101
Las Vegas, NV 89117

17 Yellow Checker Star
ATTN: Jonathan Schwartz
18 5225 W. Post Road
19 Las Vegas, NV 89118

Independent Cab Inc.
ATTN: Claudia Hoepfner
7935 W. Sahara Ave., Suite 101
Las Vegas, NV 89117

20
21 Dated this 23 day of December, 2021.

22
23
24 
25 _____
Employee of the Taxicab Authority

26
27
28



SEP 21 2021

-o0o-

BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY

In the matter of an application for a certificate of public convenience and necessity by applicants Brent Carson and Claudia Maria Hoepfner (Independent Cab Company, LLC), and request for thirty-five taxicab medallions.

Prehearing Conference - August 23, 2021

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

FINDINGS OF FACT

The Hearing Officer makes the following Findings of Fact, based upon a preponderance of the evidence:

1. On December 18, 2019, an application ("Application") for a new certificate of public convenience and necessity ("CPCN"), along with a request for thirty-five taxicab medallions, was received by the Taxicab Authority.

2. The Applicants are Brent Carson, Esq. and Claudia Hoepfner, as the principals of Independent Cab Company, LLC.

3. A public hearing regarding this application was noticed and agendized by the Taxicab Authority for Thursday, February 20, 2020 at 9:30 AM.

4. The following ("Petitioners") timely filed pleadings with the Taxicab Authority, and petitioned to request status as interveners in this matter pursuant to NAC 706.894: 1) A Cab; 2) Boulder Cab, Inc. (d/b/a Deluxe Taxicab Service); 3) Desert Cab, Inc.; 4) the Industrial, Technical and Professional Employees Union (ITPEU- AFL/CIO); 5) Lucky Cab Co. and Western Cab Company; 6) Nellis Cab, LLC; 7) Whittlesea Blue Cab Company,

1 Henderson Taxi, and Blue Desert, LLC (d/b/a Virgin Valley Cab); 8) Yellow Cab Corporation,
2 Checker Cab Corporation, and Star Cab Corporation.

3 5. The Applicants (Brent Carson, Claudia Maria Hoepfner, and Independent Cab
4 Company, LLC) filed an "Opposition to Petitions for Leave to Intervene" with the office of the
5 Taxicab Authority on February 25, 2020. This Opposition alleged that all Petitioners failed to
6 serve the Applicants as required under NAC 706.921, alleged failures by all Petitioners to
7 meet the requirements of NAC 706.894 to qualify as an intervener and requested that each
8 petition to intervene be denied.

9
10 6. The Administrator set a prehearing conference for Monday, March 2, 2020, to
11 consider the petitions to intervene regarding the application of Brent Carson and Claudia
12 Hoepfner, as the principals of Independent Cab Company, LLC, to decide whether to grant
13 intervener status to one or more petitioners, and to consider the possible scope and duration
14 of any requested discovery period(s) as well as any other matters authorized under NAC
15 706.933.

16 7. After listening to the statements and arguments of the petitioners, the hearing
17 officer found the petitions defective under NAC 706.894 and denied intervener status in the
18 prehearing conference order of May 26, 2021. The hearing officer did grant interested party
19 status to the petitioners, except for Boulder Cab which failed to appear at the hearing.

20
21 8. Six petitioners filed appeals of the decision. The Industrial, Technical and
22 Professional Employees Union (ITPEU – AFL/CIO) and Boulder Cab, Inc. did not file appeals,
23 although a representative of Boulder Cab voiced support for the appeals of the other
24 petitioners at a hearing.

25 9. The Taxi Authority held a hearing on the appeals on July 9, 2021.
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27
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1 10. By order dated July 15, 2021 the Taxicab Authority dismissed the appeal of A
2 Cab, but reversed and remanding the May 26, 2021 order for further proceedings.

3 11. The five successful petitioners filed amended petitions to intervene: 1) Desert
4 Cab, Inc.; 2) Lucky Cab Co. and Western Cab Company; 3) Nellis Cab, LLC; 4) Whittlesea
5 Blue Cab Company and Henderson Taxi; and 5) Yellow Cab Corporation, Checker Cab
6 Corporation, and Star Cab Corporation.

7 12. Pursuant to the July 15, 2021 order, the Administrator set a prehearing
8 conference for August 23, 2021, to consider the petitions to intervene regarding the
9 application of Brent Carson and Claudia Hoepfner, as the principals of Independent Cab
10 Company, LLC, and to enter a full and complete pre-hearing order.

11 13. After listening to the statements and arguments of the petitioners and applicant
12 Carson, the hearing officer found the five petitions are in substantial compliance with the
13 requirements of NAC 708.894, the standard required under Checker Cab v. State Taxicab
14 Authority, 97 Nev. 5, 621 P.2d 496 (Nev. 1981). Each petitioner is directly and substantially
15 affected by the proceeding on the application; each has an interest in the potential competition
16 by Independent Cab Company, LLC; each articulated the nature of the evidence it will present
17 and the position it will take. The hearing officer did not find that the intervention of the five
18 petitioners (representing eight companies) would unduly broaden the scope of the issues.
19

20 14. After addressing the petitions to intervene regarding the application of Brent
21 Carson and Claudia Hoepfner, as the principals of Independent Cab Company, LLC, the
22 hearing officer next considered the possible scope and duration of any requested discovery in
23 this matter.
24

25 15. After listening to the statements and arguments of the five petitioners and
26 applicant Carson, and having previously reviewed their pleadings, the hearing officer set a
27
28

1 schedule and parameters for discovery prior to the Taxicab Authority hearing on this
2 application.

3 16. Pursuant to the July 15, 2021 order, the hearing in this application must take
4 place no later than January 5, 2022. Accordingly, the hearing shall be set for Wednesday,
5 January 5, 2022 at 9:00 AM in the Nevada State Business Center, 3300 W. Sahara Ave.,
6 Suite 400 – Nevada Room, Las Vegas, NV 89102. A final pre-hearing conference shall be set
7 for Monday, December 6, 2021 at 9:00 AM at the same location, pursuant to NAC 706.933.

8 17. The hearing officer found that the Applicants and any intervener who wants to
9 present exhibits or evidence of any kind at the hearing on this application for a new certificate
10 of public convenience and necessity must prepare and serve the proposed evidence or
11 exhibits on the Applicants and all other parties by November 22, 2021.

12 18. The hearing officer found that the Applicants and any intervener who wants to
13 present one or more witnesses to give testimony at the hearing by the Taxicab Authority on
14 this application must prepare and serve its proposed "witness list" on the Applicants and all
15 other parties by November 22, 2021. This "witness list" will include the name of all proposed
16 witnesses, their contact information, and a brief description of the nature of their proposed
17 testimony.
18

19 19. The hearing officer also found that the obligation regarding discovery and
20 witnesses is reciprocal on both the Applicants as well as the interveners. A failure to
21 appropriately serve any proposed evidence by November 22, 2021 may render that evidence
22 inadmissible at the hearing by the Taxicab Authority on this application. A failure to
23 appropriately provide notice of a witness through service of a "witness list" (including the name
24 of that proposed witness, their contact information, and a brief description of the nature of their
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1 proposed testimony) by November 22, 2021 may render that witness's testimony inadmissible
2 at the hearing by the Taxicab Authority on this application.

3 20. The hearing officer also found that, even if appropriately noticed and/or provided
4 to the Applicants and all interveners, any proposed exhibits, evidence, or witnesses for the
5 hearing by the Taxicab Authority on this application are still subject to the rules of evidence
6 and the regulations of the Taxicab Authority, including NAC 706.948, and will only be admitted
7 into evidence at the hearing with the approval of the Taxicab Authority.

8 21. The hearing officer found that, being parties, the five interveners (representing a
9 total of eight companies) have the right to depose the Applicants, any witnesses of the
10 Applicants, or other witnesses of any other intervener. This right is reciprocal, and Applicants
11 have the right to depose the interveners, or any witnesses of the interveners.
12

13 22. In order to meet the November 22, 2021 filing deadlines, and not unduly burden
14 the parties, the interveners jointly are limited to three depositions. Applicants are limited to five
15 depositions, as there are a greater number of interveners than applicants.

16 23. The hearing officer found that, being parties, the five interveners may submit
17 interrogatories and compel answers to those interrogatories by the Applicants, to formulate
18 and/or simplify the issues, pursuant to NAC 706.933(1). Intervenors may serve a total of 50
19 interrogatories jointly, either by agreement as to their division or, absent such agreement, by
20 serving no more than ten each. Applicants may serve 50 interrogatories in total upon the five
21 interveners.
22

23 24. The hearing officer found that, being parties, the five interveners will have the
24 right to cross-examine the Applicants, any witnesses of the Applicants, other interveners, and
25 witnesses of any other intervener as part of these proceedings or at the hearing on the
26 application.
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1 Authority regarding such an application is subject to judicial review pursuant to NRS
2 233B.130.

3 3. Pursuant to NAC 706.933, a prehearing conference may be held before a
4 hearing of the Taxicab Authority takes place "for the purposes of formulating or simplifying the
5 issues, obtaining admissions of fact and of documents which will avoid unnecessary proof,
6 arranging for the exchange of proposed exhibits or prepared expert testimony, limit the
7 number of witnesses and consolidate the examination of witnesses, establish procedure at the
8 hearing and resolve other matters that may expedite orderly conduct and the disposition of the
9 proceedings or settlements."
10

11 4. Appropriate notice of this prehearing conference was given to all Applicants and
12 Petitioners.

13 5. NAC 706.876 through NAC 706.990 "[g]overn all practice and procedure before
14 the Taxicab Authority and the Administrator unless otherwise directed by the Authority or
15 Administrator," but these practice rules "[m]ust be liberally construed to secure just, speedy
16 and economical determination of all issues presented to the Authority." NAC 706.876(1).
17

18 6. The Nevada Rules of Civil Procedure do not govern the practice and procedure
19 before the Taxicab Authority or the Administrator, as these matters are not civil actions or
20 proceedings in a district court of the State of Nevada. NRCP 1.

21 7. Regarding practice and procedure in proceedings before the Taxicab Authority
22 and the Administrator, an intervener is "any person or persons permitted to intervene pursuant
23 to NAC.894." NAC 706.885(1)(d).

24 8. "Persons, other than the original parties to the proceeding, who are directly and
25 substantially affected by the proceeding, shall serve notice on the Authority or Administrator,
26 of their intention to intervene by submitting a clear and concise statement, in writing, of the
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1 interest of the applicant in such proceeding, outlining the matters and things relied upon by the
2 applicant as basis for his or her request, together with a statement as to the nature of
3 evidence the applicant will present and the position the applicant will take." NAC 706.894(1).

4 9. "Notice to Intervene must be filed with the Authority or Administrator 15 days
5 before the commencement of hearing. If filed thereafter, the petition must state a substantial
6 reason for the delay; otherwise the petition will not be considered." NAC 706.894(2).

7 10. The granting of intervener status is left to the discretion of the Taxicab Authority,
8 presiding officer or Administrator, and is not a matter of right even if "a notice of intervention
9 shows direct and substantial interest in the subject matter of the proceeding or any part
10 thereof and does not unduly broaden the issues..." NAC 706.894(3).

11 11. "At any hearing, all parties named in NAC 706.885, except interested parties,
12 are entitled to enter an appearance, to introduce evidence, examine and cross-examine
13 witnesses, make arguments, and generally participate in the conduct of the proceeding." NAC
14 706.886(1).

15 12. The five amended petitions to intervene in this matter of an application for a new
16 certificate of public convenience and necessity ("CPCN"), along with a request for thirty-five
17 taxicab medallions, by Brent Carson and Claudia Hoepfner as the principals of Independent
18 Cab Company, LLC, substantially complied with the requirements of NAC 706.894, and
19 accordingly were approved.
20

21 13. It was within the discretion of the hearing officer to resolve matters of the scope
22 and duration of discovery before the Taxicab Authority holds its hearing regarding the
23 application for a new certificate of public convenience and necessity. NAC 706.933.
24

25 14. At a hearing of the Taxicab Authority, "[w]here two or more interested parties
26 have substantially like interests and positions, the presiding officer of the Authority or
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1 Administrator may at any time during the hearing, if he or she deems it advisable in order to
2 expedite the hearing, limit the number of interested parties who will be permitted to testify."
3 NAC 706.951(2).

4 15. The Taxicab Authority has the authority to dismiss interveners at the hearing if it
5 is determined that an intervener does not have a direct or substantial interest or that the public
6 interest does not require the intervener's participation, pursuant to NAC 706.894(3).

7 16. Regarding a prehearing conference held before a hearing of the Taxicab
8 Authority occurs, "[t]he action taken at the conference and the agreements made by the
9 parties concerned must be made a part of the record and will control the course of subsequent
10 proceedings, unless modified at the hearing by the presiding officer." NAC 706.933(2).
11

12 17. If any of the foregoing conclusions of law is more appropriately construed as a
13 finding of fact, it may be so construed.
14

15 **ORDER**

16 Based on the foregoing, THEREFORE, IT IS HEREBY ORDERED:

17 1) That in this matter of an application for a certificate of public convenience and
18 necessity by Applicants Brent Carson and Claudia Maria Hoepfner (Independent Cab
19 Company, LLC), and request for thirty-five (35) taxicab medallions, the petitions requesting
20 status as interveners by 1) Desert Cab, Inc; 2) Lucky Cab Co. and Western Cab Company; 3)
21 Nellis Cab, LLC; 4) Whittlesea Blue Cab Company and Henderson Taxi; 5) Yellow Cab
22 Corporation, Checker Cab Corporation, and Star Cab Corporation, are all hereby GRANTED.
23

24 2) That, no later than November 22, 2021, the Applicants and any intervener who
25 wants to present exhibits or evidence of any kind at the hearing on this application for a new
26 certificate of public convenience and necessity must prepare and serve the proposed
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1 evidence or exhibits on the Applicants and all other parties. A failure to appropriately serve
2 any proposed exhibits or evidence by November 22, 2021 may render that evidence
3 inadmissible at the hearing by the Taxicab Authority on this application.

4 4) That, no later than November 22, 2021, the Applicants and any intervener who
5 wants to present one or more witnesses to give testimony at the hearing by the Taxicab
6 Authority on this application must prepare and serve its proposed "witness list" on the
7 Applicants and all other parties. This "witness list" will include the name of all proposed
8 witnesses, their contact information, and a brief description of the nature of their proposed
9 testimony. A failure to appropriately provide notice of a witness through service of a "witness
10 list" (including the name of that proposed witness, their contact information, and a brief
11 description of the nature of their proposed testimony) by November 22, 2021 may render that
12 witness's testimony inadmissible at the hearing by the Taxicab Authority on this application.

14 5) That the five interveners are parties and may engage in the presentation of
15 evidence and witnesses, as well as cross-examination of witnesses, at the hearing of the
16 Taxicab Authority on this application. The Applicants and five interveners may conduct
17 discovery as follows:

- 18 a) The interveners jointly are limited to three depositions. Applicants are
19 limited to five depositions.
20
21 b) The interveners may serve a total of 50 interrogatories jointly, either by
22 agreement as to their division or, absent such agreement, by serving no
23 more than ten each. Applicants may serve 50 interrogatories in total upon
24 the five interveners.
25
26 c) The parties may seek a subpoena for the production of books, papers,
27 accounts or other documents from the Applicants, any witnesses of the
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1 Applicants, interveners or witnesses of any other party, as part of these
2 proceedings or at the hearing on the application, by applying in writing
3 pursuant to the provisions of NAC 706.936(1); however, the grant of such
4 a subpoena is discretionary.

5 6) That the Applicants and five interveners may seek a subpoena to require the
6 attendance of one or more of their witnesses at the hearing on this application by applying in
7 writing pursuant to the provisions of NAC 706.936(1); however, the grant of such a subpoena
8 is discretionary.

9 7) That any proposed exhibits, evidence or witnesses of the parties for the hearing
10 by the Taxicab Authority on this application, even if appropriately noticed and/or provided to
11 the other parties, are still subject to the rules of evidence and the regulations of the Taxicab
12 Authority, including NAC 706.948, and will only be admitted into evidence at the hearing with
13 the approval of the Taxicab Authority or their delegated presiding officer.

14 8) That at the hearing by the Taxicab Authority on this application, the Taxicab
15 Authority or their delegated presiding officer may limit the number of parties who will be
16 permitted to testify, notwithstanding the grant of intervener status and the provisions of this
17 Order.

18 9) That the actions taken at this prehearing conference are hereby part of the
19 record of the proceedings regarding this application, and this Order will control the course of
20 subsequent proceedings unless modified at the hearing by the Taxicab Authority or their
21 delegated presiding officer.

22 10) That the terms of this Order are subject to modification by action of the Taxicab
23 Authority, or a subsequent prehearing conference.
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EXHIBIT 1

CERTIFICATE OF MAILING

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I, Nancy Moran,

do hereby certify that I deposited in the U.S. mail, postage prepaid, via First Class Mail and Certified Return receipt Requested, a true and correct copy of the foregoing Findings of Fact, Conclusions of Law, and Order to the following:

Whittlesea – Henderson
ATTN: Brent Bell
1910 Industrial Road
Las Vegas, NV 89102

Lucky Cab
ATTN: Jason Awad
4195 W. Diablo
Las Vegas, NV 89103

Whittlesea – Henderson
ATTN: Cheryl Gibbons
1910 Industrial Road
Las Vegas, NV 89102

Lucky Cab
ATTN: Ryan Awad
4195 W. Diablo
Las Vegas, NV 89103

Whittlesea – Henderson
ATTN: Mark Trafton
1910 Industrial Road
Las Vegas, NV 89102

Deluxe
ATTN: Rich Flaven
P.O. Box 531787
Henderson, NV 89053-1787

Cooper Levenson Law Firm
ATTN: Kimberly Maxson-Rushton
3016 W. Charleston Blvd., Suite 195
Las Vegas, NV 89102

Jim Jimmerson
415 S. 6th Street, Suite 100
Las Vegas, NV 89101

Western Cab
ATTN: Marilyn Moran
4195 W. Diablo
Las Vegas, NV 89103

A Cab
ATTN: Jay Nady
1500 Searles Avenue
Las Vegas, NV 89101

Western Cab
ATTN: John Moran
4195 W. Diablo
Las Vegas, NV 89103

A Cab
ATTN: Mike Malloy
1500 Searles Avenue
Las Vegas, NV 89101

Lucky/Western
ATTN: Jason Lather
4195 W. Diablo
Las Vegas, NV 89103

ITPEU/OPEIU LOCAL
ATTN: Mike Kilgo
4480 W. Hacienda Ave., Suite 110
Las Vegas, NV 89118

Lucky/Western
ATTN: Donald Chan
4195 W. Diablo
Las Vegas, NV 89103

Robert Winner Esq.
4675 Wynn Road
Las Vegas, NV 89103

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Desert Cab
ATTN: Rich Frakes
4675 Wynn Road
Las Vegas, NV 89103

Desert Cab
ATTN: George Balaban
4675 Wynn Road
Las Vegas, NV 89103

Nellis Cab
ATTN: Michelle Langille
5490 Cameron Street
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Nellis Cab
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Esther Rodriguez Esq.
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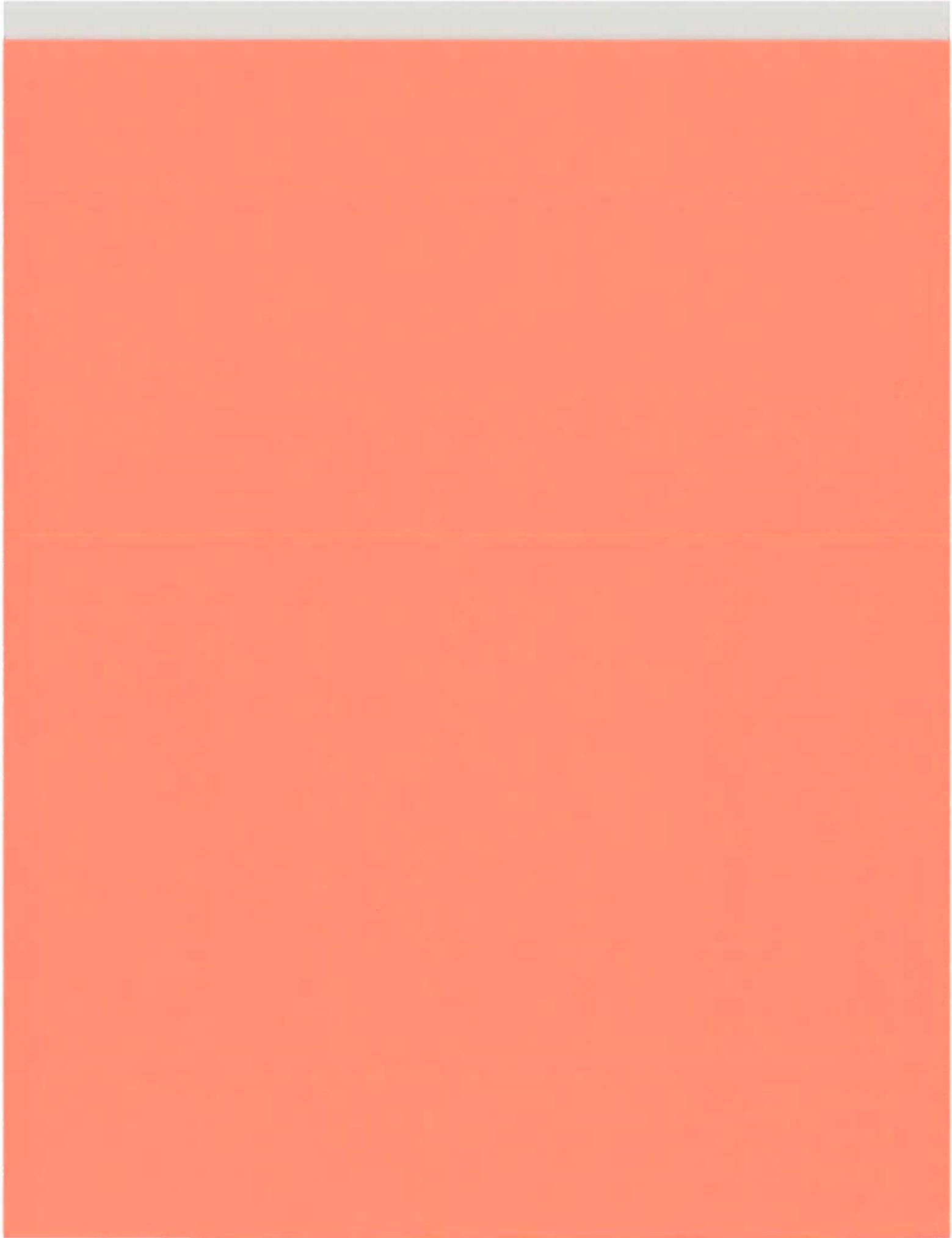
Independent Cab Inc.
ATTN: Brent Carson
7935 W. Sahara Ave., Suite 101
Las Vegas, NV 89117

Independent Cab Inc.
ATTN: Claudia Hoepfner
7935 W. Sahara Ave., Suite 101
Las Vegas, NV 89117

Dated this 7th day of September, 2021.



Employee of the Taxicab Authority



NAC 706.975 Appeals to Authority. (NRS 233B.050, 706.8818)

1. An appeal from the decision of the Administrator or hearing officer to the Authority is permitted providing that the notice of appeal by the appellant is filed with the Administrator within 30 days of the decision of the Administrator or hearing officer.

2. Petitions for appeal must set forth the ground or grounds upon which the appellant considers the order, decision, rule, direction or regulation to be unreasonable, unlawful, erroneous or not in conformity with the law. The appellant shall include in the appeal a copy of the transcript from the contested hearing.

3. Copies of the notice of appeal must be served upon the Administrator and all of the parties of record.

NAC 706.936 Subpoenas; depositions. (NRS 233B.050, 706.8818)

1. Subpoenas requiring the attendance of a witness from any place in the State to any designated place of hearing for the purpose of taking testimony of the witness orally before the Authority or Administrator, may be issued by any member of the Authority or the Administrator upon application in writing. Subpoenas for the production of books, papers, accounts or other documents, unless directed to issue by the Authority or Administrator on their own motion, will be issued only upon application in writing, which application must specify, as clearly as may be, the books, papers, accounts or other documents desired. The Authority, presiding officer or Administrator, upon motion made promptly and, in any event, at or before the time specified in the subpoena for compliance may:

(a) Quash the subpoena if it is unreasonable or oppressive; or

(b) Condition denial of the motion upon the advancement by the person in whose behalf the subpoena is issued of the reasonable cost of producing the books, papers, accounts or other documents desired.

2. The Authority, Administrator or any party to any proceeding before them may cause the depositions of witnesses to be taken in the manner prescribed by law and rule of court for depositions in civil actions.

NAC 706.933 Prehearing conference. (NRS 233B.050, 706.8818)

1. The Authority, presiding officer or Administrator may, upon written notice to all parties of record, hold a prehearing conference for the purposes of formulating or simplifying the issues, obtaining admissions of fact and of documents which will avoid unnecessary proof, arranging for the exchange of proposed exhibits or prepared expert testimony, limit the number of witnesses and consolidate the examination of witnesses, establish procedure at the hearing and resolve other matters that may expedite orderly conduct and the disposition of the proceedings or settlements.

2. The action taken at the conference and the agreements made by the parties concerned must be made a part of the record and will control the course of subsequent proceedings, unless modified at the hearing by the presiding officer.

6



AGENDA ITEM 6

Industry Discussion
(For Discussion Only)



7

AGENDA ITEM 7

Staff Report (For Discussion Only)

- A. Administrator's Report
- B. Chief Investigator's Report
- C. Stats
- D. Legal Counsel
- E. Future Agenda Items

February 2022

Investigations

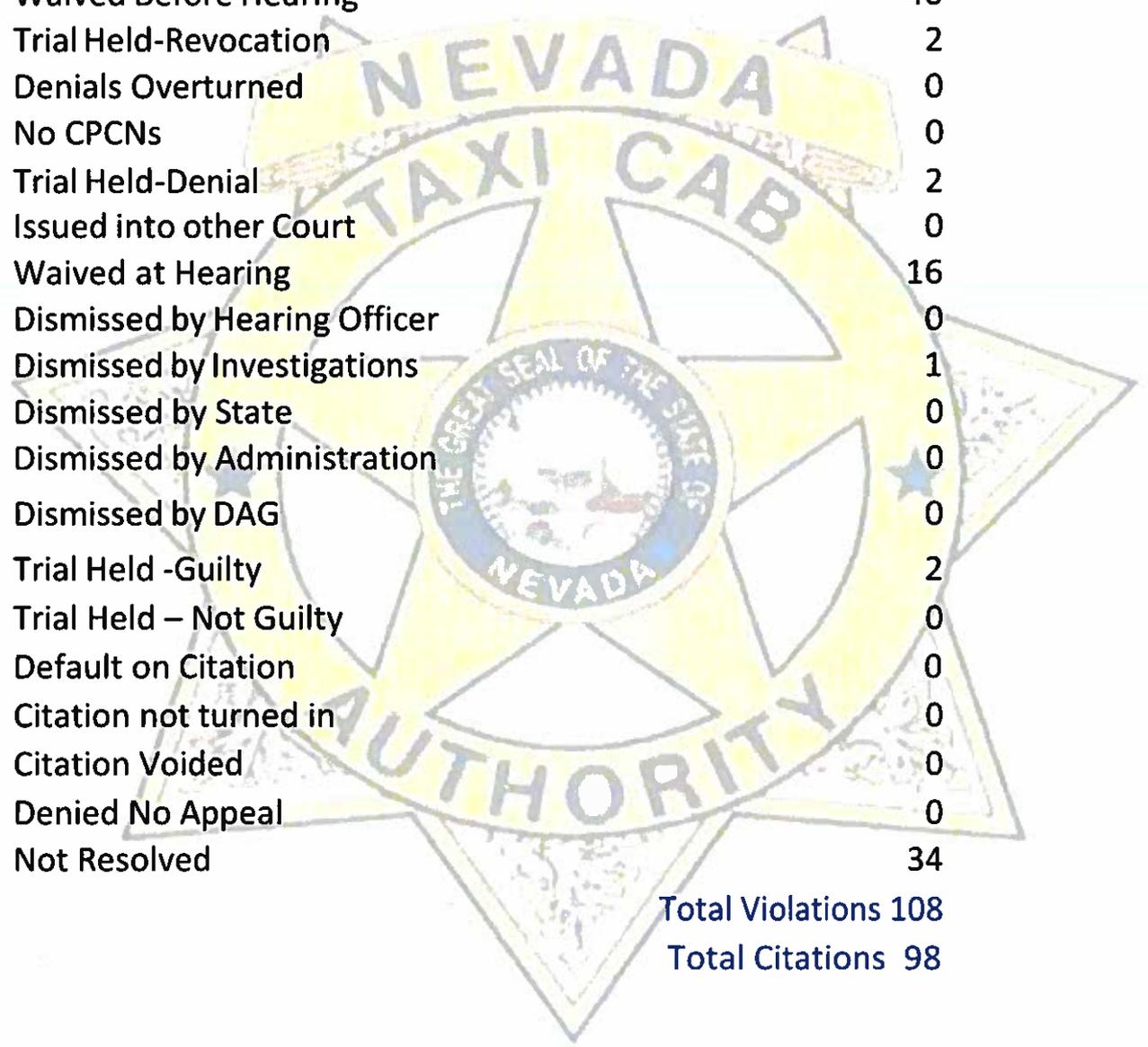
➤ Total number of citations written	98
➤ Total number of violations written (including impounds)	108
➤ Total number of long hauling citations	1

Court

➤ Total number of violations resolved	74
➤ Total number of failed to appear in Court	15
➤ Total number of waived before Hearing (walk-ins)	40
➤ Total number of Hearings held	15
○ Guilty	02
○ Not Guilty	00
○ Denial	02
○ Revocation	02
○ Dismissed	01
➤ Total number of violations Waived at Hearing (on court day)	16
➤ Total number dismissed by Hearing Officer	00
➤ Total number dismissed by DAG	00
➤ Total number dismissed by Administration	00
➤ Total number of denied- Overturned	01
➤ Total number dismissed by Investigations	01
➤ Total number Impound/Special	02
➤ Total number of No CPCNs	00
➤ Total number of warrant arrests	00
➤ Total number citations not turned in	00
➤ Total number citations voided	00

Citation/ Violation Dispositions Summary

From Feb 1 '22 through Feb 28 '22



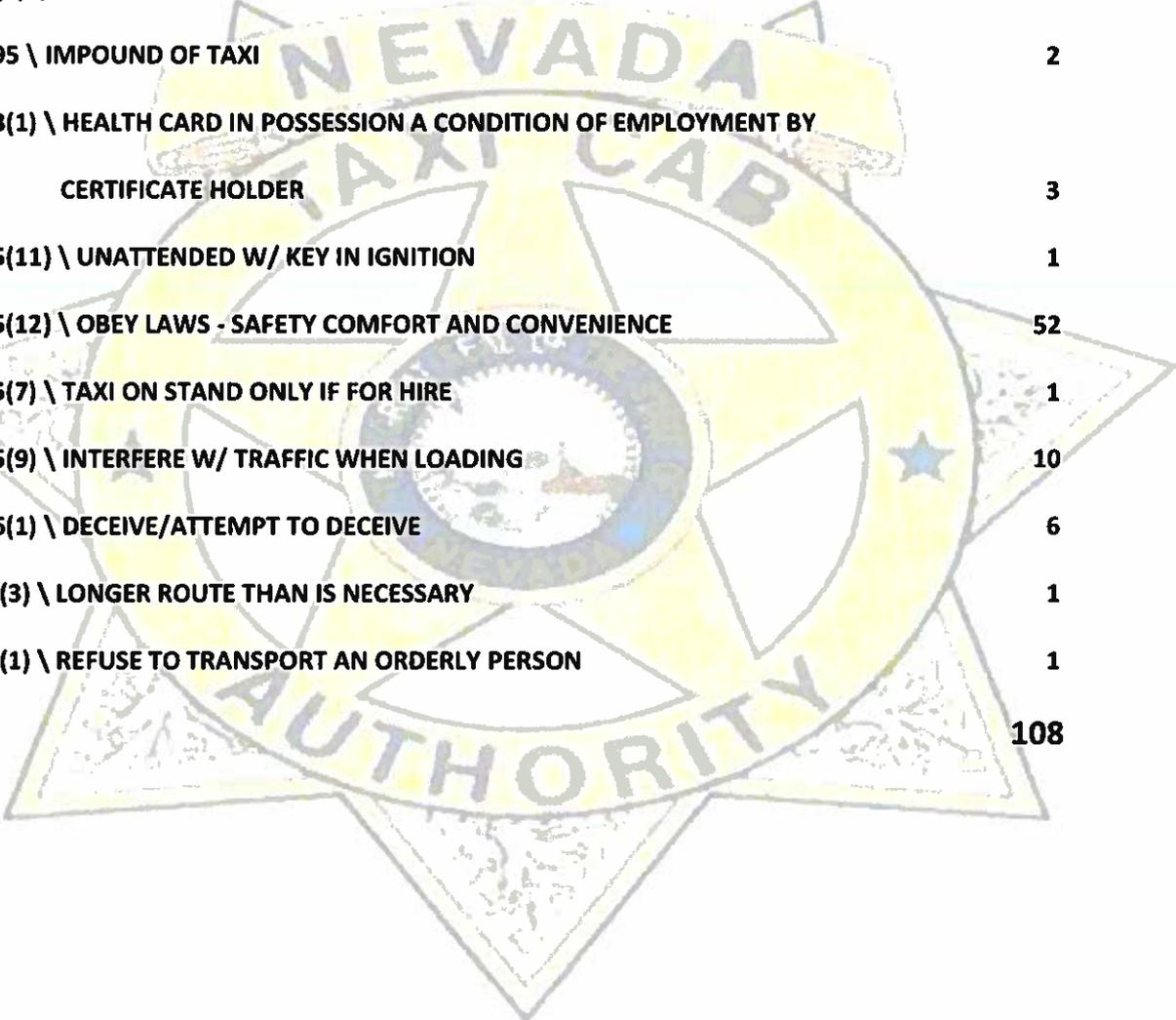
Fail To Appear in Court	15
Waived Before Hearing	40
Trial Held-Revocation	2
Denials Overturned	0
No CPCNs	0
Trial Held-Denial	2
Issued into other Court	0
Waived at Hearing	16
Dismissed by Hearing Officer	0
Dismissed by Investigations	1
Dismissed by State	0
Dismissed by Administration	0
Dismissed by DAG	0
Trial Held -Guilty	2
Trial Held – Not Guilty	0
Default on Citation	0
Citation not turned in	0
Citation Voided	0
Denied No Appeal	0
Not Resolved	34

Total Violations 108

Total Citations 98

Citation Violation Report

From Feb 1 '22 through Feb 28 '22

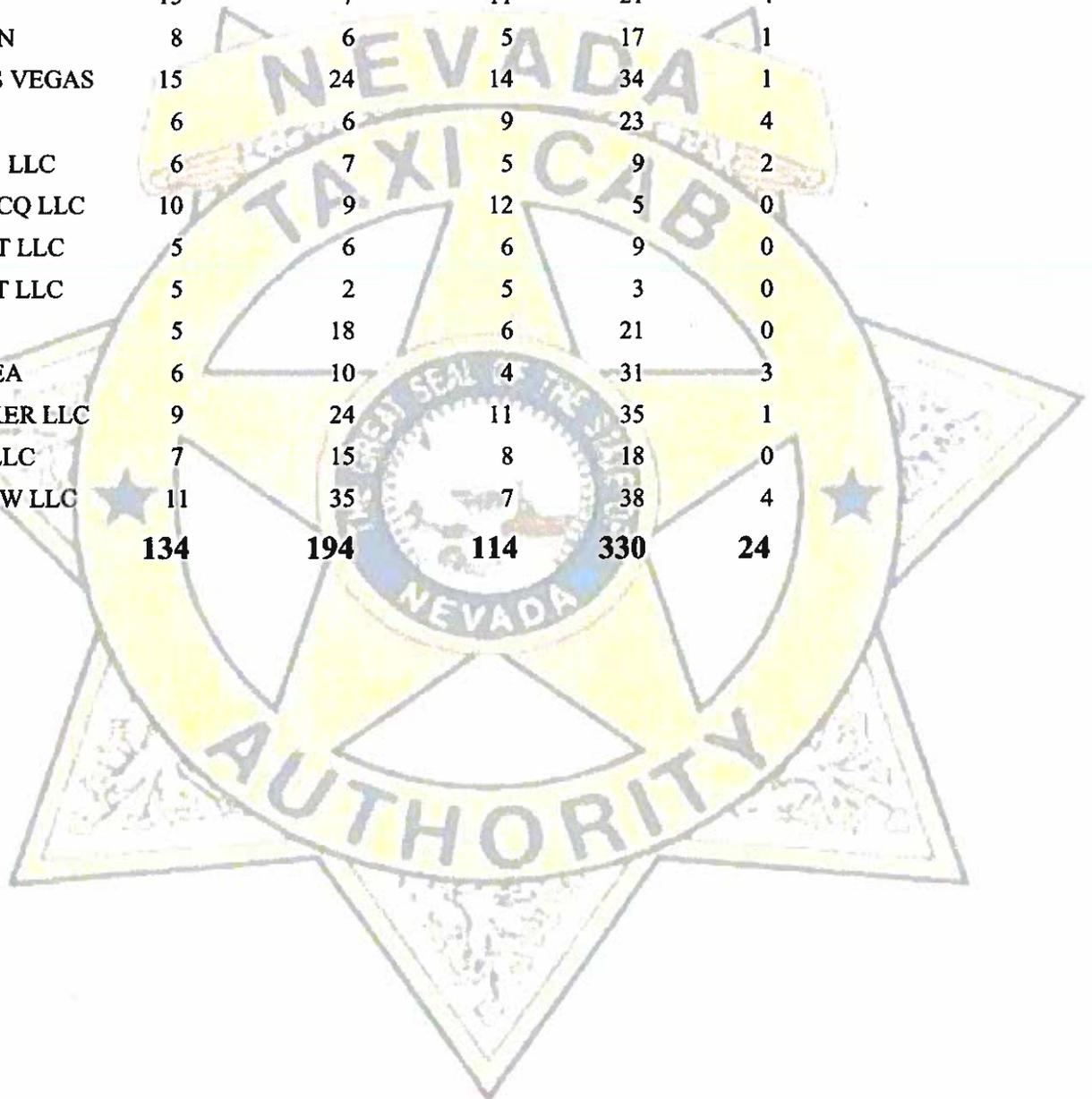


NAC 706.531(1) \ DISPLAY T.A. PERMIT	4
NAC 706.531(2) \ PERMIT; UPRIGHT AND UNOBSTRUCTED	3
NAC 706.543(3) \ ROTATION OF TAXI STAND	21
NAC 706.556(2) \ AN INDEPENDENT CONTRACTOR WILL KEEP A COPY OF LEASE IN TAXICAB	3
NRS 706.88395 \ IMPOUND OF TAXI	2
NRS 706.8843(1) \ HEALTH CARD IN POSSESSION A CONDITION OF EMPLOYMENT BY CERTIFICATE HOLDER	3
NRS 706.8845(11) \ UNATTENDED W/ KEY IN IGNITION	1
NRS 706.8845(12) \ OBEY LAWS - SAFETY COMFORT AND CONVENIENCE	52
NRS 706.8845(7) \ TAXI ON STAND ONLY IF FOR HIRE	1
NRS 706.8845(9) \ INTERFERE W/ TRAFFIC WHEN LOADING	10
NRS 706.8846(1) \ DECEIVE/ATTEMPT TO DECEIVE	6
NRS706.8846(3) \ LONGER ROUTE THAN IS NECESSARY	1
NRS706.8847(1) \ REFUSE TO TRANSPORT AN ORDERLY PERSON	1
Total	108

Monthly Report

February 2022

Cab company	OSN Issued	24HR Issued	Accident	Inspection	Meter seal
A-CAB	14	9	7	20	2
BD VIRGIN VALLEY	8	8	2	30	2
DELUXE	4	8	2	16	0
DESERT	15	7	11	21	4
HENDERSON	8	6	5	17	1
LUCKY LAS VEGAS	15	24	14	34	1
NELLIS	6	6	9	23	4
NEWCAB 21 LLC	6	7	5	9	2
NEWCAB ACQ LLC	10	9	12	5	0
NEWCAB CT LLC	5	6	6	9	0
NEWCAB TT LLC	5	2	5	3	0
WESTERN	5	18	6	21	0
WHITTLESEA	6	10	4	31	3
YCS CHECKER LLC	9	24	11	35	1
YCS STAR LLC	7	15	8	18	0
YCS YELLOW LLC	11	35	7	38	4
Total:	134	194	114	330	24



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AGENDA ITEM 8

Public Comment

9

AGENDA ITEM 9

Adjournment
(Action)