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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

A.N., a minor, by and through her legal
guardian, F.N.,

Plaintiffs,

v.

CLARK COUNTY SCHOOL DISTRICT;
JHONE EBERT, an individual, ALLEN YEE,
an individual; BRIAN D. CONWAY, an
individual; DOES I through X, inclusive; and
ROE BUSINESS ENTITIES XI through XX,
inclusive,

Defendants.

Case No.

**COMPLAINT;
DEMAND FOR JURY TRIAL**

Plaintiff F.N. ("Plaintiff's Mother") as legal guardian for A.N. ("Plaintiff")(collectively
"Plaintiffs"), by and through their counsel of record, Greenberg Gross LLP, hereby complain and
allege as follows:

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff's Mother, F.N., was at all relevant times herein a resident of Las Vegas,
Nevada, and she is the legal guardian of minor Plaintiff A.N., who was 13 years old at all relevant
times described herein.

2. Plaintiff, A.N., was at all relevant times herein a resident of Las Vegas, Nevada,
residing under the care and custody of Plaintiff's Mother.

3. Defendant CLARK COUNTY SCHOOL DISTRICT ("CCSD") at all times relevant

1 herein was and is a political subdivision of the State of Nevada having its principal place of business
2 in Clark County, Nevada. CCSD purposely conducts substantial educational business activities in
3 the State of Nevada, and was the primary entity owning, operating, and controlling Clifford J.
4 Lawrence Junior High School (“Lawrence”) and the activities and behavior of their staff, employees,
5 and students. On information and belief, CCSD is responsible for the actions and inactions and the
6 policies, procedures, and practices/customs of the district. CCSD had the power to establish,
7 implement, and enforce district-wide policies concerning employee supervision, background
8 screening, surveillance monitoring, and response to allegations of staff sexual misconduct against
9 students.

10 4. At all times relevant herein, Defendant JHONE EBERT (hereinafter “Ebert”), was
11 an individual employed as the superintendent of CCSD with final policymaking authority over the
12 district's operations, personnel, student safety protocols, and response to reports of employee
13 misconduct. At all times relevant to this lawsuit, Ebert was acting under color of law and had
14 supervisory authority over the school's operations, staff, and student safety protocols. On
15 information and belief, Ebert's authority as superintendent included the power to establish,
16 implement, and enforce district-wide policies concerning employee supervision, background
17 screening, surveillance monitoring, and response to allegations of staff sexual misconduct against
18 students. Ebert had actual knowledge of systemic patterns of sexual abuse by CCSD employees and
19 deliberately chose not to implement adequate policies or take corrective action to protect students
20 like Plaintiff.

21 5. At all times relevant herein, Defendant ALLEN YEE (hereinafter “Yee”), was an
22 individual employed as the principal of Lawrence Junior High School and had supervisory authority
23 over school operations, staff supervision, student safety, and implementation of district policies at
24 the school level. Yee was acting under color of state law at all times relevant to this lawsuit. Yee
25 had actual knowledge that Conway was engaging in improper interactions with Plaintiff, yet failed
26 to take any investigative, preventative, or corrective actions to ensure the safety of Plaintiff. Yee
27 also had access to surveillance footage showing improper interactions between Conway and Plaintiff
28 but failed to review footage, implement monitoring protocols, or take corrective action

1 6. At all times relevant herein, Defendant BRIAN DANIEL CONWAY (“Conway”)
2 was an adult male residing in Clark County, Nevada, and was employed by CCSD as an 8th grade
3 pre-algebra and math teacher at Clifford J. Lawrence Junior High School. At all times relevant to
4 this lawsuit, Conway worked as a math teacher for CCSD until his arrest on February 3, 2026 for
5 engaging in sexual misconduct against Plaintiff.

6 7. The true names, capacities, and identities of Defendants Does I through X are
7 unknown to Plaintiff at this time, who therefore sues said Defendants by such fictitious names.
8 Plaintiffs are informed and believe and therefore allege that each of Defendants Does I through X
9 are responsible in some manner for the events and happenings referred to herein and actually,
10 proximately, and/or legally caused injuries and damages to Plaintiff as alleged herein. Plaintiff will
11 seek leave of Court to amend this Complaint, to insert the true names and capacities of Does I
12 through X, when they become known and to join such Defendants in this action. Each Doe defendant
13 was acting under color of state law at all times relevant to this Complaint.

14 8. The true names, capacities, and identities of Defendants Roe Business Entities XI
15 through XX are unknown to Plaintiff at this time, who may be corporations, associations,
16 partnerships, subsidiaries, holding companies, owners, predecessors-in-interest or successors-in-
17 interest entities, joint venturers, parent corporations or other related business entities of Defendants,
18 and/or serving as alter ego of, any and/or all Defendants, who were acting on behalf of or in concert
19 with, or at the direction of Defendants, and/or are entities responsible for the supervision of the
20 individually named Defendants, and/or are entities employed by and/or otherwise directing the
21 individual Defendants in the scope and course of their responsibilities, and may be responsible for
22 the injurious activities of the other Defendants. Plaintiff alleges that each named Doe and Roe
23 Business Entity Defendant negligently, willfully, intentionally, recklessly, vicariously, or otherwise,
24 caused, directed, allowed or set in motion the injurious events set forth herein. Each named Doe and
25 Roe Business Entity Defendant is legally responsible for the events and happenings alleged in this
26 Complaint, and therefore, actually, proximately, and/or legally caused injuries and damages to
27 Plaintiff. Plaintiff will seek leave of Court to amend this Complaint, to insert the true names and
28 capacities of the Roe Business Entities XI through XX, when they become known and to join such

1 Defendants in this action.

2 9. At all times relevant herein, Defendants, and each of them, were agents, servants,
3 partners, and employees of each and every other Defendant and/or Doe and Roe Entity Defendants
4 and were acting within the course and scope of their agency, partnership, or employment and under
5 color of state law.

6 10. This Court has original jurisdiction over Plaintiff's claims for relief pursuant to 28
7 U.S.C. § 1331 and 28 U.S.C. § 1343(a)(3). This Court has supplemental jurisdiction over Plaintiff's
8 state law claims pursuant to 28 U.S.C. § 1367(a).

9 11. Venue is proper in this Court under 28 U.S.C. § 1391(b) because the events or
10 omissions giving rise to Plaintiff's claims occurred in Clark County, Nevada.

11 12. This case arose in Clark County, Nevada and pursuant to LR IA 1-8 of the Local
12 Rules of Practice for the United States District Court, District of Nevada, this case should be
13 assigned to the Southern Division of the United States District Court, District of Nevada.

14 **GENERAL ALLEGATIONS**

15 13. At all relevant times herein, Plaintiff A.N. was a 13-year-old 8th grade student
16 enrolled at Clifford J. Lawrence Junior High School in Las Vegas, Clark County, Nevada. She was
17 an active participant in school activities, and was under the care, supervision, and control of CCSD
18 during the time of the incidents described herein.

19 14. At all relevant times herein, Defendant Conway was employed by CCSD as an 8th
20 grade pre-algebra and math teacher at Clifford J. Lawrence Junior High School.

21 15. Conway was 48 years old at the time he sexually abused Plaintiff.

22 16. Beginning approximately in August 2025 and continuing through January 2026,
23 Defendant Conway engaged in a systematic course of grooming and sexual abuse of Plaintiff A.N.,
24 a student in his math class.

25 **A. Conway's Grooming and Sexual Abuse of Plaintiff**

26 17. Conway was Plaintiff's last-period 8th grade math teacher. Beginning in August
27 2025, Conway cultivated an inappropriate and manipulative relationship with Plaintiff by inviting
28 her to spend lunch periods and time after school in his classroom, ostensibly for tutoring. Conway

1 would frequently close the door to the classroom when he was alone with Plaintiff.

2 18. Other students and staff observed the unusually close nature of the relationship.
3 Other students at the school asked whether Conway was Plaintiff's father. A fellow student told
4 police she observed Plaintiff frequently interacting with Conway.

5 19. Upon information and belief, Plaintiff was frequently late to the class following
6 lunch due to spending lunch time with Conway. Conway would repeatedly write Plaintiff notes to
7 excuse Plaintiff's tardiness to the class following lunch.

8 20. Conway initiated electronic communications with Plaintiff by requesting her
9 Instagram account. Conway then used Instagram and the encrypted messaging application Signal to
10 communicate with Plaintiff. Conway specifically directed Plaintiff to use Signal for privacy. The
11 communications rapidly escalated to sexually explicit content, with Conway and Plaintiff
12 exchanging nude photographs and sexually explicit videos.

13 21. Conway saved Plaintiff's contact in his phone as "Mi Amor." Conway expressed
14 romantic and sexual feelings toward Plaintiff, called her pet names such as "baby" and "babe," and
15 gave her gifts including a gold necklace and a hoodie. Conway also tracked Plaintiff via a phone
16 application.

17 22. Conway engaged in escalating physical sexual contact with Plaintiff on campus.
18 Initially, Conway would touch Plaintiff's back as they passed in hallways. The contact escalated to
19 Conway touching Plaintiff's thighs during class time. Subsequently, Conway hugged Plaintiff when
20 she remained after school.

21 23. On Plaintiff's last day at the school, at the end of January 2026, Conway had Plaintiff
22 sit on his desk in front of him, then touched her thighs, including both on top of and underneath her
23 skirt, touched her breasts and buttocks over her clothing, and kissed her on the lips.

24 24. Conway admitted to Plaintiff that the school's Vice Principal had warned him to stop
25 spending so much time alone with Plaintiff, and that he could get in trouble.

26 25. On information and belief, Conway acknowledged to law enforcement the Vice
27 Principal's warning about Conway spending time with Plaintiff.

28 26. On approximately February 3–4, 2026, after Plaintiff's family relocated to another

1 state, Plaintiff's mother discovered the explicit messages and photographs on Plaintiff's phone. The
2 family contacted law enforcement immediately. The Las Vegas Metropolitan Police Department
3 arrested Conway the next day.

4 27. During his police interview, Conway confirmed that he knew Plaintiff, that he had
5 tutored her after school and between classes, and that she struggled in math. Law enforcement
6 searched Conway's residence and seized multiple electronic devices, cellular phones, and clothing
7 items that corroborated the abuse.

8 28. On February 19, 2026, a Clark County grand jury indicted Conway on charges
9 including use of a minor under the age of 14 in producing Child Sexual Abuse Material, luring
10 children or mentally ill persons with the use of technology with the intent to engage in sexual
11 conduct, possession of visual presentation depicting sexual conduct of a child, and lewdness with a
12 child under the age of 14.

13 29. Prior to his employment at CCSD, Conway taught middle school math in Nampa,
14 Idaho beginning in 2016. Conway "voluntarily separated" from the Nampa School District in the
15 school year prior to his hire at CCSD. On information and belief, CCSD either failed to conduct
16 adequate background and reference checks, or obtained information through those checks that
17 should have precluded Conway's hire, yet hired him nonetheless.

18 **B. CCSD Had Actual Knowledge of Conway's Risk to Students**

19 30. CCSD had actual knowledge of the risk Conway posed to students prior to and during
20 his abuse of Plaintiff. The school's Vice Principal warned Conway directly to stop spending so much
21 time alone with Plaintiff, demonstrating actual, on-campus awareness of the inappropriate
22 relationship. Despite this direct warning, neither the Vice Principal nor any other school official
23 notified Plaintiff's parents, removed Conway from his position, increased supervision of his
24 interactions with students, or took any other protective action.

25 31. Multiple teachers at Lawrence Junior High were aware that Plaintiff was arriving late
26 to their classes due to time spent in Conway's classroom, with Conway repeatedly writing Plaintiff
27 tardy excuse notes. Yet the school took no action to investigate or address the pattern.

28 32. Plaintiff would routinely spend her lunch break with Conway in Conway's classroom

1 and likewise would regularly spend several hours after school with Conway in Conway's classroom.
2 Despite this knowledge, the school took no action to investigate or address Conway's improper
3 relationship with a student.

4 33. On information and belief, Lawrence Junior High School had surveillance cameras
5 installed on campus. CCSD agents and employees nonetheless failed to monitor, review, or act upon
6 surveillance footage that would have shown Conway's improper and escalating contact with
7 Plaintiff.

8 **C. CCSD's Pattern and Practice of Deliberate Indifference to Employee Sexual**
9 **Abuse**

10 34. CCSD had actual knowledge of a pervasive, systemic pattern of sexual abuse of
11 students by CCSD employees spanning multiple decades. This knowledge came from multiple
12 sources. According to CCSD Police Officer Matthew Caldwell's testimony to the Nevada
13 Legislature in March 2023, 13 to 15 CCSD staff members are arrested annually for child
14 exploitation, a pattern so pervasive it required legislative intervention through Senate Bill 38.

15 35. Despite this actual knowledge of a pattern of employee sexual abuse, CCSD's final
16 policymakers, including the CCSD Superintendent and Board of Trustees, deliberately chose not to
17 implement adequate policies, training, or supervision protocols to protect students. This deliberate
18 choice constitutes an unofficial policy or custom of deliberate indifference to student safety.

19 36. Defendants had notice of at least the following allegations of sexual misconduct by
20 employees of CCSD, which evidence that the failures are endemic and that CCSD acted negligently,
21 wantonly, willfully, recklessly, and/or with deliberate indifference to students including Plaintiff's
22 health, safety, and constitutional rights by continuing to fail to promulgate and implement policies,
23 procedures, training programs, and controls to protect students, including Plaintiff, from abuse:

24 a. Approximately 2008: a Simmons Elementary teacher is arrested on suspicion
25 of sexually molesting students;

26 b. Approximately 2012: Dailey Elementary School teacher John Stalmach was
27 arrested for reportedly having sex with a 16-year-old student and was allowed to resign to
28 avoid having the incident documented in his personnel file;

1 c. Approximately 2012: Brown Junior High teacher Bambi Dewey was arrested
2 for reportedly having sex with a 16-year-old student;

3 d. Approximately 2013: Foothill High School teacher Amanda Brennan was
4 charged with luring children or mentally ill persons with the intent to engage in sexual
5 conduct after exchanging 1,000 text messages with a 15-year-old special education student;

6 e. Approximately 2014: Hyde Park Middle School teacher Tanikka Queen was
7 charged with sexual misconduct for reportedly having sex with a student and exchanging
8 more than 2,400 text messages with him;

9 f. Approximately 2015: Sedway Middle School teacher Charles Young was
10 arrested for lewdness for reportedly luring a student to his apartment for sex and sending the
11 student nude photographs;

12 g. Approximately 2015: Rancho High School teacher Jason Lofthouse was
13 arrested on kidnapping and sexual abuse charges for reportedly engaging in sexual acts with
14 a student;

15 h. Approximately 2016: Valley High School teacher Jillian LaFave was arrested
16 on allegations she kissed a special education student and exchanged over 13,000 text
17 messages with the student;

18 i. Approximately 2016: Harney Middle School teacher Robyn-Lea Gentile was
19 arrested on allegations that she had kissed a student;

20 j. Approximately 2016: Legacy High School teacher Frank Bayer was arrested
21 on allegations of having sex with a student in his classroom and vehicle and reportedly
22 exchanged hundreds of private messages engaging in cybersex with the student;

23 k. Approximately 2017: The United States Department of Education found that
24 CCSD violated Title IX by, among other things, failing to respond promptly and equitably
25 to complaints, reports, and incidents of sex-based harassment;

26 l. Approximately 2017: CCSD kindergarten teacher Melvyn Sprowson was
27 found guilty of kidnapping and child pornography after holding a 16-year-old student for
28 two months in his apartment as a sex slave;

1 m. Approximately 2017: Brown Middle School teacher Jeffery Schults was
2 arrested for sexual misconduct with a student;

3 n. Approximately 2017: Tarkanian Middle School custodian was arrested and
4 charged with three counts of unlawful contact with minors under 14 years of age;

5 o. Approximately 2019: Sierra Vista High School teacher Jonathan Cronin was
6 arrested on four counts of sexual misconduct, four counts of open or gross lewdness, and
7 one count of exhibiting obscene material to a minor;

8 p. Approximately 2022: CCSD approved a \$9,000,000 settlement in a civil case
9 stemming from allegations of sexual assault against CCSD employee Michael Banco, a bus
10 driver sentenced to 35 years in prison for sexually assaulting young students;

11 q. Approximately 2023: CCSD approved another settlement in a civil case
12 stemming from additional allegations of sexual assault against CCSD employee Michael
13 Banco;

14 r. Approximately 2023: CCSD teacher Kaitlin Glover was arrested for
15 lewdness with a child 14 or 15 years of age and engaging in sexual conduct with a pupil 16
16 or older;

17 s. December 2024: CCSD janitor Devyn Hudson was convicted of Sexual
18 Conduct Between Certain Employees or Volunteers of School and a Pupil for engaging in
19 sex acts with a 15-year-old student;

20 t. Approximately 2025: Manuel J. Cortez Elementary teacher Manuel Ayala-
21 Tovar was arrested and charged with lewdness with a child;

22 u. Approximately 2025: Assistant Principal of Canyon Springs High School,
23 Hearley Smith, was arrested and charged with twenty-two (22) counts related to sexual
24 misconduct with CCSD students.

25 37. Each of these incidents was known to CCSD's final policymakers, including the
26 CCSD Superintendent and members of the CCSD Board of Trustees, through arrest reports, media
27 coverage, personnel actions, civil litigation, settlement payments, and/or federal investigations.

28 38. CCSD Police Officer Matthew Caldwell's March 2023 testimony to the Nevada

1 Legislature that 13–15 CCSD staff members are arrested annually for child sexual exploitation
2 constituted actual notice to CCSD’s final policymakers of a pervasive, ongoing pattern rather than
3 isolated incidents.

4 39. In approximately 2017, the United States Department of Education found that CCSD
5 violated Title IX by failing to respond promptly and equitably to reports of sex-based harassment.
6 This further constituted actual notice to CCSD’s final policymakers that existing policies and
7 practices were inadequate.

8 40. The above demonstrates a longstanding, widespread, or well-settled practice that
9 CCSD routinely and repeatedly failed children under its supervision.

10 **D. CCSD’s Failure to Implement Adequate Policies**

11 41. Despite actual knowledge of the pervasive pattern of employee sexual abuse
12 described above, CCSD’s final policymakers deliberately failed to implement adequate policies to
13 protect students. This deliberate failure constitutes an unofficial policy or custom of deliberate
14 indifference.

15 42. Specifically, CCSD’s final policymakers deliberately failed to establish, implement,
16 or enforce policies addressing the following known risks: (a) no adequate policy requiring
17 monitoring of surveillance footage for improper staff-student interactions; (b) no adequate policy
18 for training staff to identify grooming behaviors, despite actual knowledge that CCSD employees
19 were using electronic communications and social media to groom students; (c) no adequate policy
20 ensuring surveillance coverage in classrooms and after-school areas where employees and students
21 could be left alone; (d) no adequate policy for screening or background investigation of employees
22 with access to vulnerable students, including review of the circumstances of prior voluntary
23 separations from other school districts; (e) no adequate policy requiring school administrators who
24 warn employees about inappropriate conduct to report such conduct to parents and to CCSD
25 administration; (f) no adequate policy for mandatory reporting to parents when staff-student contact
26 raises concern, even absent a formal complaint; and (g) no adequate policy for investigating warning
27 signs indicative of improper staff-student interactions.

28 43. CCSD’s failure to implement these policies was not due to lack of knowledge or

1 resources. Rather, it was a deliberate choice made by the district's final policymakers.

2 44. CCSD's deliberate choice not to implement adequate policies despite knowledge of
3 rampant sexual abuse of CCSD students constitutes deliberate indifference to student safety and
4 created an unofficial policy or custom that caused Plaintiff's constitutional injury.

5 45. CCSD's pattern of failing to take corrective action in response to repeated incidents
6 of employee sexual abuse constitutes an implied policy or settled custom of deliberate indifference
7 to student safety. This repeated pattern of inaction despite actual knowledge of ongoing abuse
8 constitutes an implied policy that sexual abuse of students by CCSD employees will be tolerated
9 and that adequate preventive measures will not be implemented.

10 46. CCSD's implied policy of deliberate indifference was the moving force behind the
11 deprivation of Plaintiff's constitutional rights. This policy created the conditions that enabled
12 Conway's abuse by: (a) failing to monitor surveillance footage showing Conway's improper contact
13 with Plaintiff; (b) failing to train staff to recognize and respond to grooming behaviors; (c) failing
14 to ensure adequate surveillance coverage in classrooms and after-school spaces; (d) creating an
15 environment where a school administrator could warn a teacher about an inappropriate relationship
16 with a student without any mandatory escalation, documentation, or parent notification; (e) failing
17 to investigate warning signs indicative of improper staff-student interactions; and (e) creating an
18 environment where employee sexual abuse was predictable and preventable but not prevented.

19 **E. The Individual Defendants' Deliberate Indifference**

20 47. Ebert, as Superintendent of CCSD with final policymaking authority, had actual
21 knowledge of: (a) the pattern of 13–15 annual arrests of CCSD staff for child sexual exploitation,
22 as testified to the Nevada Legislature; (b) the multi-million dollar settlements paid for incidents of
23 prior employee sexual abuse; and (c) the specific incidents of employee sexual misconduct
24 documented in the paragraphs above.

25 48. Despite this actual knowledge, Ebert deliberately failed to: (a) establish district-wide
26 policies requiring enhanced supervision of employees; (b) establish district-wide policies for
27 surveillance monitoring; (c) establish district-wide training programs on detecting and responding
28 to grooming behaviors, including the use of electronic and social media communications for

1 grooming purposes; and (d) take corrective action to address the widespread pattern of abuse.

2 49. Yee, as principal at Lawrence Junior High School, had actual or constructive
3 knowledge of: (a) Conway's employment at Lawrence Junior High School; (b) the Vice Principal's
4 warning to Conway to stop spending excessive time alone with Plaintiff; and (c) the pattern of
5 escalating staff-student misconduct through electronic communications at CCSD.

6 50. Despite this actual knowledge, Yee deliberately failed to: (a) implement enhanced
7 supervision protocols for Conway; (b) review surveillance footage showing Conway's interactions
8 with Plaintiff; (c) ensure adequate surveillance coverage in Conway's classroom and other areas
9 where he was alone with Plaintiff; (d) mandate that the Vice Principal's warning be reported to
10 parents and escalated within CCSD; (e) conduct any investigation after observing warning signs
11 indicative of improper staff-student interactions; and, (f) establish procedures for responding to
12 reports of improper staff-student contact.

13 51. Ebert's and Yee's failure to act despite actual knowledge of substantial risk to
14 students constitutes deliberate indifference under the Fourteenth Amendment. At all times relevant,
15 these Defendants were acting under color of state law.

16 **FIRST CAUSE OF ACTION**

17 ***(Violation of Civil Rights 42 U.S.C. § 1983)***

18 ***(Plaintiff against CCSD and Roe Business Entities XI through XX)***

19 52. Plaintiff repeats and realleges each and every allegation set forth above as though
20 fully set forth herein.

21 53. Defendant, CCSD, acted under color of law in committing the acts complained of
22 herein.

23 54. Plaintiff had and has a constitutional right to bodily integrity and freedom from
24 unjustified physical intrusions under the due process clause of the Fourteenth Amendment to the
25 United States Constitution.

26 55. CCSD, through their actions and inactions, facilitated Conway's sexual abuse and
27 thereby violated Plaintiff's rights under the Fourteenth Amendment to the United States
28 Constitution.

1 56. CCSD has a longstanding practice of failing to protect students from harm inflicted
2 by teachers. Such longstanding practice is evidenced by: (a) public testimony that 13–15 CCSD staff
3 are arrested annually for child sexual exploitation; (b) the numerous specific incidents of sexual
4 misconduct by CCSD employees documented above; and (c) the through multi-million dollar
5 settlement payments that the families of children that were harmed by CCSD staff.

6 57. CCSD acted pursuant to longstanding practice of failing to protect students from
7 harm inflicted by teachers or staff, which permitted: (a) Conway to cultivate a months-long
8 grooming relationship with Plaintiff because CCSD failed to implement policies prohibiting
9 unsupervised student contact; (b) Conway to engage in escalating physical sexual contact with
10 Plaintiff on campus because CCSD failed to monitor surveillance footage showing Conway's
11 improper interactions with Plaintiff; (c) Conway to exchange hundreds of sexually explicit
12 electronic communications with Plaintiff because CCSD failed to implement policies restricting or
13 monitoring staff-student electronic communications; (d) Conway to isolate Plaintiff in his classroom
14 because Defendants failed to implement or enforce policies against students spending unsupervised
15 time, both during and after-school, alone with teachers; and (e) Conway to commit repeated acts of
16 sexual abuse because Defendants' failure to investigate overt signs of an improper teacher student
17 relationship and pattern of deliberate indifference created an environment where such abuse was
18 predictable but not prevented.

19 58. CCSD's customs and practices of inaction and deliberate indifference were the
20 moving force that caused the deprivation of Plaintiff's constitutional rights, which permitted
21 Conway to sexually abuse Plaintiff as described immediately above.

22 59. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered
23 extreme physical, mental, and emotional distress, and harm. Further, Defendants' conduct deprived
24 Plaintiff of her constitutional right to bodily integrity and freedom from unjustified physical
25 intrusions under the due process clause of the Fourteenth Amendment to the United States
26 Constitution.

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SECOND CAUSE OF ACTION

(Violation of Civil Rights 42 U.S.C. § 1983)

(Plaintiff against Ebert, Yee, and Does I through X)

60. Plaintiff repeats and realleges each and every allegation set forth above as though fully set forth herein.

61. At all times relevant herein, Ebert was the Superintendent of CCSD and had final policymaking authority over district operations, personnel, student safety protocols, and response to employee misconduct. At all times relevant herein, Defendant Yee was the Principal of Lawrence Junior High School and had supervisory authority over school operations, staff supervision, student safety, and implementation of district policies at the school level. Both Defendants Ebert and Yee were acting under color of state law at all times relevant to this Complaint. Ebert, Yee, and Does I through X are hereinafter referred to as the Individual Defendants.

62. The Individual Defendants had actual knowledge that: (a) 13–15 CCSD staff are arrested annually for child sexual exploitation, as testified to the Nevada Legislature; (b) the specific incidents of employee sexual abuse documented in the paragraphs above occurred and were known to CCSD; (c) Lawrence Junior High School’s Vice Principal had warned Conway about his inappropriate relationship with Plaintiff but took no further action; and (d) a pattern of staff/student sexual misconduct existed within CCSD requiring enhanced protective measures.

63. The Individual Defendants, despite this knowledge, failed to act in the following ways: (a) establish district-wide policies requiring enhanced supervision of employees; (b) establish district-wide training programs for staff to detect and respond to grooming behaviors; (c) take corrective action to address the systemic pattern of abuse despite multiple forms of actual notice; (d) ensure that adequate resources were allocated to student protection measures; (e) implement enhanced supervision protocols for Conway following the Vice Principal’s warning; (f) review or ensure review of surveillance footage showing Conway’s interactions with Plaintiff; (g) ensure adequate surveillance coverage in Conway’s classroom; (h) establish or implement procedures requiring mandatory parent notification when school administrators warn staff about inappropriate conduct with a student; and, (i) conduct any investigation after observing warning signs indicative

1 of improper staff-student interactions between Conway and Plaintiff.

2 64. The Individual Defendants' failure to act, despite their actual knowledge of
3 substantial risk, was so closely related to the deprivation of Plaintiff's constitutional right to bodily
4 integrity and freedom from unjustified physical intrusions under the due process clause of the
5 Fourteenth Amendment to the United States Constitution as to be the moving force that caused the
6 ultimate injury.

7 65. Plaintiff would not have suffered sexual abuse if the Individual Defendants had
8 provided adequate protection and safety. As an actual and proximate result of the Individual
9 Defendants' conduct, Plaintiff has suffered extreme physical, mental, and emotional distress, and
10 harm.

11 **THIRD CAUSE OF ACTION**

12 ***(Negligence)***

13 ***(Plaintiff against CCSD and Roe Business Entities XI through XX)***

14 66. Plaintiff repeats and realleges each and every allegation set forth above as though
15 fully set forth herein.

16 67. At all times relevant hereto, CCSD had a general duty to exercise reasonable care in
17 their interactions with Plaintiff.

18 68. Moreover, a special relationship existed between CCSD and Plaintiff, which arose
19 from the mandatory character of school attendance and the comprehensive control over students
20 exercised by school personnel. Accordingly, Defendants owed heightened duties, including a duty
21 to exercise reasonable care to supervise and protect students such as Plaintiff from harm while under
22 CCSD's custody, care, and control.

23 69. CCSD breached this duty of care when they implemented or failed to implement
24 policies, procedures, customs, and practices, which resulted in Plaintiff being sexually abused by
25 Conway. CCSD's conduct constituting a breach of their duty of care includes, but is not limited to:

- 26 a. failure to train CCSD personnel, including its employees, to identify and
27 investigate signs of grooming and sexual abuse, including the use of social media and
28 encrypted messaging applications to facilitate grooming of minor students;

1 b. failure to create policies and procedures that create and preserve a safe
2 environment for children, including Plaintiff, in order to avoid and protect against sexual
3 exploitation, child abuse, and/or other physical or mental injury to children under CCSD's
4 care and custody;

5 c. failure to ensure CCSD's compliance with their own policies, and state and
6 federal law relative to maintaining student safety and preserving Plaintiff's constitutional
7 rights;

8 d. failure to implement or maintain procedures to sufficiently screen employees
9 prior to the date of hire, including failure to adequately investigate the circumstances
10 surrounding Conway's voluntary separation from the Nampa, Idaho School District in the
11 year preceding his hire at CCSD;

12 e. failure to terminate or otherwise discipline employees, including but not
13 limited to Conway;

14 f. failure to mandate reporting to parents when a school administrator has
15 warned a teacher about an inappropriate relationship with a student;

16 g. specific failures related to Defendant Conway include, but are not limited to:
17 (i) failing to report the Vice Principal's warning to Conway to Plaintiff's parents or to CCSD
18 administration; (ii) failing to increase supervision of Conway's interactions with students
19 after the Vice Principal issued a warning; (iii) failing to review surveillance footage of
20 Conway's classroom and surrounding areas; and (iv) failing to investigate the pattern of
21 Plaintiff's tardiness to other classes attributed to time spent with Conway;

22 h. failure to develop and implement appropriate policies to ensure adequate
23 surveillance coverage and monitoring in all areas where students and staff interact;

24 i. failure to monitor Conway by allowing him to be alone and unsupervised
25 with minor students for extended periods after school and during lunch;

26 j. failure to investigate or intervene when Conway was inappropriately
27 interacting with Plaintiff on campus despite actual knowledge of the inappropriate
28 relationship;

1 k. failure to respond appropriately to the known pattern of sexual abuse by
 2 CCSD employees, as evidenced by CCSD Police Officer Matthew Caldwell's testimony that
 3 13 to 15 staff members are arrested annually for child exploitation;

4 l. failure to respond appropriately to the known pattern of sexual abuse by
 5 CCSD employees: John Stalmach, Bambi Dewey, Amanda Brennan, Tanikka Queen,
 6 Charles Young, Jason Lofthouse, Jillian LaFave, Robyn-Lea Gentile, Frank Bayer, Melvyn
 7 Sprowson, Jeffery Schults, Jonathan Cronin, Michael Banco, Kaitlin Glover, Manuel Ayala-
 8 Tovar, Hearley Smith, Devyn Hudson;

9 m. failure to implement adequate policies to prevent employee grooming
 10 behaviors and inappropriate employee-student electronic communications, despite
 11 knowledge of systemic abuse within the district.

12 70. CCSD's conduct was the actual and proximate cause of Plaintiff's injuries.

13 71. As a result of CCSD's conduct, Plaintiff suffered damages in the form of extreme
 14 physical and/or emotional distress, shame, mental anxiety, humiliation, grief, and sorrow.

15 **FOURTH CAUSE OF ACTION**

16 ***(Intentional Infliction of Emotional Distress)***

17 ***(Plaintiff Against All Defendants)***

18 72. Plaintiff repeats and realleges each and every allegation set forth above as though
 19 fully set forth herein.

20 73. Defendant Conway engaged in extreme and outrageous conduct by systematically
 21 grooming and sexually abusing Plaintiff, a 13-year-old student in his math class at Lawrence Junior
 22 High School.

23 74. Defendants CCSD, Lawrence Junior High School's Principal Yee, and the CCSD
 24 Superintendent Ebert failed to protect vulnerable students like Plaintiff from Conway, despite actual
 25 on-campus knowledge of the inappropriate relationship, knowledge that manifested in the Vice
 26 Principal's direct warning to Conway, combined with the district's actual knowledge of a systemic
 27 pattern of employee sexual misconduct. This failure constitutes extreme and outrageous conduct
 28 and amounts to a reckless disregard for causing emotional distress to Plaintiff. Defendants' failure

1 in this case, combined with deliberate indifference to a known pattern of employee sexual
2 misconduct, demonstrates a reckless disregard for the emotional well-being of students under their
3 care.

4 75. Defendant Conway sexually abused a 13-years-old student in his class, which is
5 extreme and outrageous conduct and amounts to a reckless disregard for causing emotional distress
6 to Plaintiff.

7 76. Defendants intended to cause, or acted with a reckless disregard for causing,
8 emotional distress to Plaintiff.

9 77. As a direct and proximate result of the actions of the Defendants, and each of them,
10 as alleged herein, Plaintiff suffered extreme mental, physical, and emotional harm, anxiety,
11 humiliation, grief, and sorrow.

12 78. The severe emotional distress suffered by Plaintiff includes, but is not limited to,
13 severe depression, anxiety, post-traumatic stress disorder, suicidal ideation requiring intervention to
14 prevent self-harm, the need for intensive mental health treatment including inpatient hospitalization
15 and intensive outpatient therapy, encompassing group, individual, and family therapy, which caused
16 substantial disruption to her schooling and life.

17 **FIFTH CAUSE OF ACTION**

18 ***(Battery)***

19 ***(Plaintiff Against Conway)***

20 79. Plaintiff repeats and realleges each and every allegation set forth above as though
21 fully set forth herein.

22 80. Defendant Conway intentionally engaged in harmful and offensive physical contact
23 with Plaintiff without her legal consent, including: touching Plaintiff's thighs in his classroom
24 during class time; touching Plaintiff's thighs both over and beneath her skirt; touching Plaintiff's
25 breasts and buttocks over her clothing; and kissing Plaintiff on the lips. Conway engaged in these
26 acts of unwanted physical contact on at least four separate occasions.

27 81. The contact perpetrated by Conway was overtly harmful and offensive, involving
28 unwanted sexual touching of a 13-year-old child that caused immediate physical and psychological

1 harm to Plaintiff.

2 82. As a result of Conway conduct, Plaintiff suffered physical, mental, and emotional
3 harm, mental anxiety, humiliation, grief, and sorrow. The battery has caused Plaintiff severe and
4 ongoing psychological trauma, including depression, anxiety, post-traumatic stress disorder, and the
5 need for intensive inpatient and outpatient mental health treatment.

6 83. The acts of Defendant Conway were unreasonable, willful, wanton, malicious, and
7 oppressive such that Defendant Conway should be assessed punitive and/or exemplary damages.

8 **PRAYER FOR RELIEF**

9 WHEREFORE Plaintiff prays for judgment against Defendants as follows:

10 1. General and compensatory damages in the amount to be determined at the trial in
11 this matter in an amount in excess of \$75,000;

12 2. For attorney fees and costs of suit incurred herein;

13 3. For an award of punitive damages against the Defendants Ebert, Yee, and Conway;

14 4. For pre-judgment and post-judgment interest as permitted by law; and

15 5. For such other and further relief as the Court deems just and proper under the
16 circumstances.

17 DATED September 9, 2026.

18
19 GREENBERG GROSS LLP

20 By /s/ David C. Kiebler

21 JEMMA E. DUNN

22 Nevada Bar No. 16229

23 DAVID KIEBLER

24 Nevada Bar No. 16724

25 1980 Festival Plaza Drive, Suite 730

26 Las Vegas, Nevada 89135

27 Tel. (702) 777-0888

28 *Attorneys for Plaintiffs*

DEMAND FOR JURY TRIAL

Plaintiff A.N., a minor, by and through her legal guardian, F.N., hereby demands a jury trial.

DATED: September 9, 2026

GREENBERG GROSS LLP

By: /s/David Kiebler

JEMMA E. DUNN

Nevada Bar No. 16229

DAVID KIEBLER

Nevada Bar No. 16724

1980 Festival Plaza Drive, Suite 730

Las Vegas, Nevada 89135

Tel. (702) 777-0888

Attorneys for Plaintiffs

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS**A.N., a minor by and through her legal guardian, F.N.****(b)** County of Residence of First Listed Plaintiff _____

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Greenberg Gross LLP

1980 Festival Plaza Drive, Suite 730, Las Vegas, NV 89135

(702) 777-0888

DEFENDANTS**CLARK COUNTY SCHOOL DISTRICT; JHONE EBERT, an individual, ALLEN YEE, an individual; et al**

County of Residence of First Listed Defendant _____

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | ☐ 1 | ☐ 1 | Incorporated or Principal Place of Business In This State | ☐ 4 | ☐ 4 |
| Citizen of Another State | ☐ 2 | ☐ 2 | Incorporated and Principal Place of Business In Another State | ☐ 5 | ☐ 5 |
| Citizen or Subject of a Foreign Country | ☐ 3 | ☐ 3 | Foreign Nation | ☐ 6 | ☐ 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
☐ 110 Insurance	PERSONAL INJURY	☐ 625 Drug Related Seizure of Property 21 USC 881	☐ 422 Appeal 28 USC 158	☐ 375 False Claims Act
☐ 120 Marine	☐ 310 Airplane	☐ 690 Other	☐ 423 Withdrawal 28 USC 157	☐ 376 Qui Tam (31 USC 3729(a))
☐ 130 Miller Act	☐ 315 Airplane Product Liability		INTELLECTUAL PROPERTY RIGHTS	☐ 400 State Reapportionment
☐ 140 Negotiable Instrument	☐ 320 Assault, Libel & Slander		☐ 820 Copyrights	☐ 410 Antitrust
☐ 150 Recovery of Overpayment & Enforcement of Judgment	☐ 330 Federal Employers' Liability		☐ 830 Patent	☐ 430 Banks and Banking
☐ 151 Medicare Act	☐ 340 Marine		☐ 835 Patent - Abbreviated New Drug Application	☐ 450 Commerce
☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans)	☐ 345 Marine Product Liability		☐ 840 Trademark	☐ 460 Deportation
☐ 153 Recovery of Overpayment of Veteran's Benefits	☐ 350 Motor Vehicle	LABOR	☐ 880 Defend Trade Secrets Act of 2016	☐ 470 Racketeer Influenced and Corrupt Organizations
☐ 160 Stockholders' Suits	☐ 355 Motor Vehicle Product Liability	☐ 710 Fair Labor Standards Act	SOCIAL SECURITY	☐ 480 Consumer Credit (15 USC 1681 or 1692)
☐ 190 Other Contract	☒ 360 Other Personal Injury	☐ 720 Labor/Management Relations	☐ 861 HIA (1395ff)	☐ 485 Telephone Consumer Protection Act
☐ 195 Contract Product Liability	☐ 362 Personal Injury - Medical Malpractice	☐ 740 Railway Labor Act	☐ 862 Black Lung (923)	☐ 490 Cable/Sat TV
☐ 196 Franchise		☐ 751 Family and Medical Leave Act	☐ 863 DIWC/DIWW (405(g))	☐ 850 Securities/Commodities/Exchange
		☐ 790 Other Labor Litigation	☐ 864 SSID Title XVI	☐ 890 Other Statutory Actions
REAL PROPERTY	CIVIL RIGHTS	☐ 791 Employee Retirement Income Security Act	☐ 865 RSI (405(g))	☐ 891 Agricultural Acts
☐ 210 Land Condemnation	☐ 440 Other Civil Rights	IMMIGRATION	FEDERAL TAX SUITS	☐ 893 Environmental Matters
☐ 220 Foreclosure	☐ 441 Voting	☐ 462 Naturalization Application	☐ 870 Taxes (U.S. Plaintiff or Defendant)	☐ 895 Freedom of Information Act
☐ 230 Rent Lease & Ejectment	☐ 442 Employment	☐ 465 Other Immigration Actions	☐ 871 IRS—Third Party 26 USC 7609	☐ 896 Arbitration
☐ 240 Torts to Land	☐ 443 Housing/Accommodations			☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision
☐ 245 Tort Product Liability	☐ 445 Amer. w/Disabilities - Employment			☐ 950 Constitutionality of State Statutes
☐ 290 All Other Real Property	☐ 446 Amer. w/Disabilities - Other			
	☐ 448 Education			
	PRISONER PETITIONS			
	Habeas Corpus:			
	☐ 463 Alien Detainee			
	☐ 510 Motions to Vacate Sentence			
	☐ 530 General			
	☐ 535 Death Penalty			
	Other:			
	☐ 540 Mandamus & Other			
	☐ 550 Civil Rights			
	☐ 555 Prison Condition			
	☐ 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTIONCite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
Statute 42 USC 1982Brief description of cause: **Violation of Civil Rights****VII. REQUESTED IN COMPLAINT:**☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

September 10, 2026

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44**Authority For Civil Cover Sheet**

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
 - (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
 - (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
- Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
- PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related cases, if any. If there are related cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Nevada

A.N., a minor, by and through her legal guardian,
F.N.,

Plaintiff(s)

v.

CLARK COUNTY SCHOOL DISTRICT; JHONE
EBERT, an individual, ALLEN YEE, an individual;
BRIAN D. CONWAY, an individual; et al.

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Clark County School District
5100 W. Sahara Avenue
Las Vegas, NV 89146

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Jemma E. Dunn
David C. Kiebler
Greenberg Gross LLP
1980 Festival Plaza Drive, Suite 730
Las Vegas, NV 89135

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____ .

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____ ; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____ , a person of suitable age and discretion who resides there,
 on *(date)* _____ , and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____ , who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____ ; or

☐ I returned the summons unexecuted because _____ ; or

☐ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Nevada

A.N., a minor, by and through her legal guardian,
F.N.,

Plaintiff(s)

v.

CLARK COUNTY SCHOOL DISTRICT; JHONE
EBERT, an individual, ALLEN YEE, an individual;
BRIAN D. CONWAY, an individual; et al.

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Jhone Ebert
605 Thompson St
Carson City, NV 89703-4955

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Jemma E. Dunn
David C. Kiebler
Greenberg Gross LLP
1980 Festival Plaza Drive, Suite 730
Las Vegas, NV 89135

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____ .

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____ ; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____ ; or

☐ I returned the summons unexecuted because _____ ; or

☐ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Nevada

A.N., a minor, by and through her legal guardian,
F.N.,

Plaintiff(s)

v.

CLARK COUNTY SCHOOL DISTRICT; JHONE
EBERT, an individual, ALLEN YEE, an individual;
BRIAN D. CONWAY, an individual; et al.

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Allen Yee
4122 Blue Manor Ln 2094
North Las Vegas, NV 89032-0848

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Jemma E. Dunn
David C. Kiebler
Greenberg Gross LLP
1980 Festival Plaza Drive, Suite 730
Las Vegas, NV 89135

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____ .

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____ ; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____ ; or

☐ I returned the summons unexecuted because _____ ; or

☐ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Nevada

A.N., a minor, by and through her legal guardian,
F.N.,

Plaintiff(s)

v.

CLARK COUNTY SCHOOL DISTRICT; JHONE
EBERT, an individual, ALLEN YEE, an individual;
BRIAN D. CONWAY, an individual; et al.

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Brian Conway
Clark County Detention Center
330 S. Casino Center Blvd.
Las Vegas, NV 89101

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Jemma E. Dunn
David C. Kiebler
Greenberg Gross LLP
1980 Festival Plaza Drive, Suite 730
Las Vegas, NV 89135

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____ .

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____ ; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____ ; or

☐ I returned the summons unexecuted because _____ ; or

☐ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc: