

1 Case No. 18-trt-00001-1e

2 Dept. No. II

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16 *Attorneys for the Defendant*

17  
18 **IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**  
19 **IN AND FOR STOREY COUNTY**

20 LANCE GILMAN,

21 Plaintiff(s),

22 vs.

23 SAM TOLL,

24 Defendant(s).  
25 \_\_\_\_\_/

26  
27 **MOTION FOR SUBMISSION OF MOTION TO DISMISS AND**  
28 **TERMINATION OF PROCEEDINGS ON ORDER SHORTENING TIME**

29 COMES NOW, SAM TOLL, ("Defendant" or "Toll"), by and through the  
undersigned counsel, and hereby files the following Motion for Submission of Motion to

**FILED**

2019 FEB 25 AM 8:46

STOREY COUNTY CLERK

BY A. Duke  
DEPUTY

1 Dismiss and Termination of Proceedings by Plaintiff LANCE GILMAN (“Plaintiff” or  
2 “Gilman”) as described below.  
3

4 This Motion is based upon the following Memorandum of Points and Authorities,  
5 the pleadings and papers filed herein, and any oral argument on this matter that the Court  
6 should require.  
7

## 8 MEMORANDUM OF POINTS AND AUTHORITIES

### 9 *Background*

10  
11 Defendant Toll filed his Anti-SLAPP Special Motion to Dismiss over a year ago. On  
12 April 9, 2018, the Court entered an Order Granting Anti-SLAPP Special Motion to Dismiss  
13 in Part, Allowing Limited Discovery, and Staying Further Proceedings (hereinafter “Court’s  
14 Order”). The Court’s Order found in favor of the Defendant on seven out of the eight  
15 alleged defamatory statements alleged in the Plaintiff’s Complaint. On the remaining claim,  
16 the Court concluded that: (1) Toll’s statements regarding Gilman not residing in Storey  
17 County (the “resident communications”) were made to procure an electoral action, result,  
18 or outcome (Court’s Order at 10:16); (2) were made in direct connection with an issue of  
19 public concern (Court Order at 13:20); (3) were made in a place open to the public or on a  
20 public forum. (Court’s Order at 14:9); and (4) were made in furtherance of the right to free  
21 speech in direct connection with an issue of public concern. Court’s Order at 15:19.  
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26 In its Order, the Court addressed the matter of the truth of the communications at  
27 issue regarding Gilman’s residency and concluded that Toll proved by a preponderance of  
28

1 the evidence that Toll did not knowingly make a false statement when he published the  
2 resident communications. Court's Order at 15:15. The Court also concluded that, based on  
3 Gilman's testimony in his Affidavit attached hereto as Exhibit 1, "Gilman's testimony under  
4 oath that he lives in Storey County is sufficient prima facie evidence that he lives in Storey  
5 County." Court's Order at 17:3.  
6  
7

8 The Court granted leave to the Defendant to conduct discovery, "limited solely to  
9 information as to whether Toll knew the resident statements were false or whether he acted  
10 with a high degree of awareness of the probable falsity of the statement or had serious  
11 doubts as to the publication's truth." Court's Order at 21:8. Plaintiff took the deposition of  
12 Defendant Sam Toll, during which Toll refused to disclose the sources for his news stories  
13 and invoked the News Shield Privilege codified in NRS 49.275. On May 10, 2018, Plaintiff  
14 Gilman filed a Motion to Compel; Motion for Sanctions; Motion to Extend the Time  
15 Period for Discovery; and In the Alternative, Motion for Summary Judgment, to which the  
16 Defendant filed an opposition.  
17  
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19

20 On May 24, 2018, Plaintiff filed his Supplemental Opposition to Defendant's  
21 Anti-SLAPP Motion. On June 4, 2018, Defendant Toll thereafter filed his Reply and  
22 Request for Submission of the matter. On June 26, 2018, the Court issued its Order  
23 Denying Request for Submission, stating that a "new Request for Submission will need to  
24 be filed after the Motion to Compel is resolved." *Id.* at 1.  
25  
26

27 Also on June 26, 2018, over eight months ago, the Court entered a Order for  
28



1 Evidentiary Hearing on the Motion to Compel, finding that an evidentiary hearing is  
2 necessary to determine whether Toll may invoke the News Shield Privilege to protect the  
3 confidentiality of his sources.  
4

5 ***Argument***  
6

7 **a. This matter should be submitted and decided at scheduled March 15, 2019**  
8 **evidentiary hearing**  
9

10 Defendant Toll submits this Motion for Submission to expedite resolution of this  
11 matter consistent with the express intent of the Anti-SLAPP statute. As this matter is  
12 scheduled for an evidentiary hearing on March 15, 2019, the Defendant requests that the  
13 Court finally resolve his Special Anti-SLAPP Motion at that time.  
14

15 Pursuant to NRS 41.665, the purpose of the Anti-SLAPP statute is to protect persons  
16 against whom an action is brought, if the action is based upon a good faith communication  
17 in furtherance of the right to petition or the right to free speech in direct connection with  
18 an issue of public concern. The combined requirement in NRS 41.660 that SLAPP  
19 defendants file the special motion within 60 days of service of the complaint and that the  
20 Court rule on the motion within 20 judicial days after the motion is served upon the  
21 plaintiff, ensures that Anti-SLAPP proceedings should be swiftly disposed of by District  
22 Courts where First Amendment Rights to free speech are infringed upon by lawsuits  
23 seeking to stifle protected speech. To further expedite matters, the Legislature made the  
24 denial of a Special Anti-SLAPP motion to dismiss immediately appealable. NRS 41.670(4).  
25  
26  
27  
28

1 Here, Defendant's Special Motion to Dismiss has been pending for over a year, and  
2 Defendant has been waiting for over eight months for an evidentiary hearing, all the while  
3 having to raise funds for his legal defense. In light of the delay associated with the final the  
4 setting of the evidentiary hearing and resolution of his Motion to Dismiss, Defendant Toll  
5 moves this Court to submit and decide the matter at the March 15, 2019 hearing.  
6

7  
8 **b. This proceeding should be terminated as Gilman has independently claimed his**  
9 **primary residence was in Washoe County**  
10

11 This proceeding should be terminated because regardless of the outcome of the  
12 evidentiary hearing as Plaintiff Gilman cannot base a defamation action on a statement that  
13 mirrors a representation he himself has made.  
14

15 In the 2018 Affidavit of Lance Gilman, which was attached to Gilman's Opposition  
16 to Anti-SLAPP Motion to Dismiss per NRS 41.660, attached hereto as Exhibit 1, Gilman  
17 states in paragraph 42 that he had lived in Storey County since at least 2006:  
18

19 Contrary to the Defendant's assertions, *I do live in Storey County, Nevada.*  
20 My address is 5 Wild Horse Canyon and *I have lived there for around twelve*  
21 *years or more.* (Emphasis added.)  
22

23 Gilman, however, has represented the exact opposite to Washoe County. Attached  
24 hereto as Exhibit 2 is a certified copy<sup>1</sup> of data from the Washoe County Assessor's webpage  
25 for a property located at 199 Steptoe Ln. in Washoe Valley, APN No. 055-282-02, dated  
26 May 17, 2018. The record in Exhibit 2 indicates that 199 Steptoe Ln. is owned by L. Lance  
27

28 <sup>1</sup> Certified copies of public records are presumed to be authentic per NRS 52.125 and admissible per NRS 52.265.



1 Gilman, and that 199 Steptoe Ln. is also Mr. Gilman's mailing address. Under the "Tax Cap  
2 Status" box in Exhibit 2, it states that the property is a, "Low Cap Qualified Primary  
3 Residence." Exhibit 3 is also a certified copy of data from the Washoe County Assessor's  
4 webpage for a property located at 199 Steptoe Ln. in Washoe Valley, APN No. 055-282-02,  
5 but is dated February 22, 2019 - in other words, Gilman is still claiming that the 199 Steptoe  
6 Ln. property as a primary residence.<sup>2</sup>

7  
8  
9  
10 Attached hereto as Exhibit 4 is a certified copy of the July 1, 2008 Tax Cap statement  
11 for 199 Steptoe Ln. in Washoe Valley, APN No. 055-282-02 from the Washoe County  
12 Assessor, which was executed by Mr. Gilman. The document in Exhibit 4 indicates via a  
13 filled in bubble that states, "*This property will be occupied as my primary residence on July*  
14 *1, 2008.*" (Emphasis added.) The signature box in Exhibit 4, signed by Gilman, states that  
15 Gilman affirms under penalties pursuant to law that the information in Exhibit 4 is true and  
16 accurate and that Gilman will notify the Washoe County Assessor if the property is no  
17 longer to be used as Gilman's primary residence. Gilman has not done so.<sup>3</sup>

18  
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20  
21 In fact, other public records from Washoe County show that Gilman has continued  
22 as late as 2016 to affirmatively claim the 199 Steptoe Ln. property as his primary residence.  
23

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24 <sup>2</sup> After the filing of Defendant Toll's Reply to the Defendant's Supplemental Opposition to  
25 Defendant's Special Anti-SLAPP Motion, Gilman apparent transferred the Washoe County primary  
26 residence back from his individual capacity to a family trust. See Exhibit 3 hereto.

27 <sup>3</sup> At the time Exhibit 4 was provided by the Washoe County Assessor, the undersigned counsel for the  
28 Defendant requested any subsequent filing with the Washoe County Assessor where Gilman informed  
the Assessor that the 199 Steptoe Ln. property was no longer his primary residence, but was informed  
that no such subsequent record existed. NRS 361.4723 provides a partial abatement of taxes by  
applying a 3% cap on the tax bill of the owner's primary residence - and only one property may be  
selected in the State of Nevada as a primary residence.

1 Attached hereto as Exhibit 5 is a certified copy of a June 15, 2016 Grant, Bargain, and Sale  
2  
3 Deed for APN No. 055-282-02 from the Washoe County Recorder, where Gilman  
4 transferred ownership of the 199 Steptoe Ln. property from a family trust into his own  
5 name. Exhibit 5 indicates that the recording and tax statements are to be mailed to Mr.  
6  
7 Gilman at 199 Steptoe Ln. in Washoe Valley, which also shows that Gilman was  
8 affirmatively claiming the Steptoe Ln. property as his residence as late as 2016.  
9

10 During the time Mr. Gilman alleges that he was living in Storey County in his  
11 Affidavit in Exhibit 1, Mr. Gilman executed at least one document (Exhibit 4) directly  
12 claiming that his primary residence was in Washoe County during the period in which  
13  
14 Gilman's Affidavit says he was living in Storey County. Further, Gilman executed a deed in  
15 2016 which lists his mailing and tax address in Washoe County. See Exhibit 5. Thus,  
16  
17 Gilman's claims that he was defamed by Toll for stating or inferring that Gilman does not  
18 reside in Storey County are not a false statement of fact and Gilman's claim should fail as a  
19 matter of law as under NRS 41.637 as Toll's statement that Gilman does not reside in Storey  
20 County is truthful or substantially truthful based on Gilman's own representations and  
21 signed statement in Exhibit 4.<sup>4</sup> In other words, Gilman cannot show a genuine issue of  
22 material fact as to whether Toll's statements about Gilman are defamatory - they cannot be  
23  
24 because Gilman made these same statements about himself.  
25  
26

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27 <sup>4</sup> "... we accept as true all evidence favorable to the plaintiff *and assess the defendant's evidence only*  
28 *to determine if it defeats the plaintiff's submission as a matter of law.*" *Cross v. Facebook, Inc.*, 14 Cal.  
App. 5th 190, 205, 222 Cal. Rptr. 3d 250, 262, 45 Media L. Rep. 2552, 17 Cal. Daily Op. Serv. 7719,  
2017 Daily Journal D.A.R. 7731, 2017 WL 3404767 (Ct. App. 2017) (*Emphasis added*)



1  
2  
3 **c. Gilman's own statements undermine his claim - the Defendant is entitled to**  
4  
5  
6 **judgment under NRS 41.660(5) as a matter of law**

7  
8 Defamation is a publication of a false statement of fact. *Pegasus v. Reno Newspapers,*  
9  
10 *Inc.*, 118 Nev. 706, 714, 57 P.3d 82, 87, 31 Media L. Rep. 1353, 2002 WL 31487455 (2002) A  
11 statement is not defamatory if it is absolutely true, or substantially true. *Id.* at 715. A party  
12 cannot make a *prima facie* case for defamation as required by NRS 41.660(3)(b) based on a  
13 claim that a statement of fact is false and defamatory while having signed several legal  
14 documents indicating that the same statement of fact is true. Pursuant to NRS 41.637, a  
15 good faith communication is one which is "truthful or is made without knowledge of its  
16 falsehood."

17  
18 In the context of discovery proceedings being conducted when an Anti-SLAPP  
19 motion is pending under NRS 41.660(4), discovery should only be permitted for the  
20 purpose of ascertaining information required to meet the burden under NRS 41.660(3)(b),  
21 i.e. Gilman must show *prima facie* evidence a probability of prevailing on his claim. Gilman  
22 cannot make such a showing where Gilman signed documents showing that the allegedly  
23 defamatory statements by Toll are the truth.

24  
25 The Court's inquiry and evidentiary hearing scheduled for March 15, 2019 focuses on  
26 the second prong of the inquiry required by NRS 41.637, i.e. whether Toll made the  
27 statements at issue without knowledge as to their truth or falsehood. However, such an  
28 inquiry is only appropriate if the truth of the underlying allegedly defamatory statement is



1 actually at issue. Toll's statement is no longer reasonably at issue as potentially defamatory  
2 because of Gilman's own statements made in duly recorded records as described above.  
3

4 Special motions to dismiss function like a summary judgment motions procedurally  
5 *Coker v. Sassone*, 135 Nev. Adv. Op. 2, 432 P.3d 746, 748, 2019 WL 117467 (2019). As such,  
6 the Court should immediately terminate these proceedings and enter judgment in favor of  
7 Toll pursuant to NRS 41.660(5).  
8

9 ***Conclusion***  
10

11 Based on the unequivocal evidence presented above, Gilman's claims that Toll  
12 defamed him by claiming that Gilman does not live in Storey County are belied by Gilman's  
13 own claims that his primary residence is in Washoe County, and as such Gilman's  
14 protestations do not provide any basis for restricting Toll's Free Speech rights under the  
15 First Amendment.  
16

17  
18 WHEREFORE, the Defendant respectfully requests that this Court submit this  
19 matter and grant the Defendant's Anti-SLAPP Special Motion, dismiss this suit, award the  
20 Defendant attorney's fees and costs associated with the Motion, and any further action the  
21 Court deems appropriate as permitted by NRS 41.670, including \$10,000 in statutory  
22 damages to the Defendant per NRS 41.670(3)(a).  
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**NRS 239B.030(4) AFFIRMATION**

I certify that the attached filing includes no social security numbers or other personal information.

Respectfully submitted this February 25, 2019:

By:   
JOHN L. MARSHALL  
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*Attorneys for the Defendant*

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that on the date indicated below, I caused service

to be completed by:

\_\_\_\_\_ personally delivering;

delivery via Reno/Carson Messenger Service;

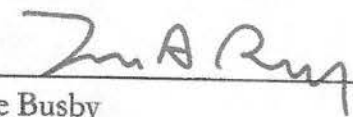
\_\_\_\_\_ sending via Federal Express (or other overnight delivery service);

\_\_\_\_\_ depositing for mailing in the U.S. mail, with sufficient postage affixed thereto; or,

\_\_\_\_\_ delivery via electronic means (fax, eflex, NEF, etc.)

a true and correct copy of the foregoing pleading addressed to:

GUS W. FLANGAS  
JESSICA K. PETERSON  
Flangas Dalacas Law Group  
3275 South Jones Blvd. Suite 105  
Las Vegas, NV 89164  
702-307-9500  
F - 702-382-9452

By:   
Luke Busby

Dated: 2-24-19



**Exhibit List**

1. Affidavit of Lance Gilman
2. Certified copy of data from the Washoe County Assessor's webpage for a property located at 199 Steptoe Ln. in Washoe Valley, APN No. 055-282-02, dated May 17, 2018
3. Certified copy of data from the Washoe County Assessor's webpage for a property located at 199 Steptoe Ln. in Washoe Valley, APN No. 055-282-02, dated February 22, 2019
4. Certified copy of the July 1, 2008 Tax Cap statement for 199 Steptoe Ln. in Washoe Valley, APN No. 055-282-02 from the Washoe County Assessor, executed by Mr. Gilman.
5. Certified copy of a June 15, 2016 Grant, Bargain, and Sale Deed for APN No. 055-282-02 from the Washoe County Recorder.

**Exhibit 1**

**Exhibit 1**





1 11. I am well aware that I am a public official and public figure and I am used to suffering  
2 the "slings and arrows" from time to time in the public forum.

3 12. I have, perhaps more than any other public figure in Northern Nevada, withstood  
4 some fairly vicious public attacks by political opponents in the press at times over the past two  
5 decades and I fully understand that attacks against me "come with the territory."

6 13. The Defendant's attacks on me with false and defamatory statements have been  
7 continuous, unrelenting, and constantly targeting me personally.

8 14. The false statements made by the Defendant are far beyond acceptable and legal  
9 conduct, and I felt compelled to take action to protect my reputation.

10 15. Because of the false unending stream of defamatory statements published by the  
11 Defendant about me, I filed a Complaint against the Defendant for Defamation Per Se.

12 16. As stated above, the Defendant published and publishes the Storeyteller Website. I  
13 have seen that the Home page of the Storeyteller Website and every other section contained therein,  
14 including the "News," "Editorial," "Letters to the Editor," "About the Storey Teller," and  
15 "Community News," sections, all contain the statement: "Support the Teller and Keep Fact Based  
16 News about Storey County Ad Free." Since the filing of this suit, those words about the being Fact  
17 Based News no longer appear.

18 17. In writing about the instant matter, the Defendant mentions that I have a conflict of  
19 interest "as I wear hats on both sides of the negotiating table." This is completely false.

20 18. The Defendant further writes about me: "A conflict of interest that places the  
21 self-interest of the Marketing Manager and exclusive Real Estate Broker for TRIC above the  
22 interests of Storey County Taxpayers, voters, and citizens." This is completely false.

23 19. I am and was a member of the Board of Commissioners for Storey County, Nevada,  
24 an elected position, and I am a principal in and the Director of Marketing for the Tahoe Reno  
25 Industrial Center (hereinafter "TRI").

26 20. My company, Lance Gilman Commercial Real Estate Services, is and has been the  
27 exclusive broker for TRI, which is a massive 80,000 acre park that encompasses a 30,000 acre  
28 industrial complex approximately nine miles east of Reno, Nevada in Storey County, Nevada, and

1 is the largest industrial park of its kind in the United States.

2 21. TRI presently has over 16 million Square Feet of Industrial space in use by over 130  
3 different companies, with over 15,000 permanent and temporary jobs created in 15 years.

4 22. I have been instrumental in attracting such nationally recognized firms as  
5 Tesla/Panasonic, who is building a "gigafactory," a massive 6 million square foot manufacturing  
6 facility, SWITCH, who is building a huge data storage co-location campus comprised of a number  
7 of buildings totaling more than 7 million square feet under roof, GOOGLE, who just purchased 1200  
8 acres earlier in 2017, as well as other global companies such as eBay, Wal-Mart, Tire Rack, Jet.com,  
9 Petsmart, Blockchains, LLC, and US Ordinance, to name a few.

10 23. TRI has provided thousands of jobs for Northern Nevada and it is anticipated that  
11 Tesla/Panasonic and SWITCH alone will together generate 10,000 more jobs for Northern Nevada  
12 and over \$400 million in payroll annually at full build out.

13 24. I have received a number of awards such as the Reno Small Business Entrepreneur  
14 of the year in 2009, Reno Man of the Year in 2000 and the Development Award for Environmental  
15 Excellence in Development in 1997.

16 25. In or around 2015, Governor Brian Sandoval personally presented me and my two  
17 TRI partners, the EDawn President's Award for completing what the Governor called the "The  
18 Deal of the Century" in landing and closing the Tesla deal.

19 26. I am the face of TRI.

20 27. I also have decades of good service to Northern Nevada.

21 28. Each year my businesses and I deliver and donate over \$100,000 in food donations  
22 and labor to needy seniors in Storey County and to a school "food in a backpack" program for  
23 children from families in need.

24 29. Beginning in 2017, the Defendant in an effort to embarrass, discredit and impugn me,  
25 published a huge number blatantly defamatory statements about me on the Storeyteller Website.

26 30. On the Storeyteller Website, the Defendant published a series of statements accusing  
27 me of not living in my actual residence and even accusing me of committing perjury about my  
28 residence on official documents.



1 31. On or around April 7, 2017, the Defendant published the following on the Storeyteller  
2 Website:

3 Team Gilman would have never subjected the citizens to the polarizing effect of the  
4 recall effort had it not been for the Washoe County resident who thinks he knows  
5 what is best for the taxpayers who shoulder the tax burden of Don Norman, Lance  
6 Gilman and the rest of the tax escapers at the Center. (Emphasis added).

6 32. The clear inference from the Defendant's statement is that I am not a resident of  
7 Storey County.

8 33. On or around April 18, 2017, the Defendant wrote on the Storey Teller Website, the  
9 following:

10 The debacle we emerged from a week ago today is not the kind of thing our county  
11 should be making the news with. Sadly, the most equal member of Storey County (if  
12 you believe he actually lives at 5 Wild Horse Canyon) cares more about himself  
13 than the county he represents. (Emphasis added).

13 34. The clear inference from the Defendant's statement is that I am not a resident of  
14 Storey County.

15 35. Then, on or around May 20, 2017, the Defendant wrote the following on the Storey  
16 Teller Website:

17 "I want the people of Storey County to know that I am a man of integrity and my  
18 word is more valuable than gold. This County has been very, very good to me and I  
19 want to deliver on promises I made over and over to the good people of Storey  
20 County regarding the cash that would be gushing around here. I want to thank them  
21 along with the entire Team Storey Team for helping Mr. Norman and me becoming  
22 the wealthiest people who do business in Storey County but don't actually live  
23 here" said Mr. Gilman. (Emphasis added).

21 36. The clear inference from the Defendant's statement is that I am not a resident of  
22 Storey County. Also, I never made that statement nor any statement to that effect.

23 37. On or about October 16, 2017, the Defendant published the following statements on  
24 the Storey Teller Website accusing me of perjury:

25 The purpose of this complaint is to hold accountable County Commissioner  
26 Gilman and Planning Commissioner Thompson for committing perjury when they  
27 filed paperwork claiming to live somewhere it is illegal to live. Since they took office  
28 illegally and since they don't actually live at Wild Horse Canyon Drive (or  
anywhere else in the county for that matter) and can't legally reside where they  
claimed they did, we conclude and insist they be prosecuted for perjury and  
removed from office. (Emphasis added).



1 38. In the same publication, the Defendant attaches what appears to be a letter to the  
2 Attorney General.

3 39. I have never been officially notified by any law enforcement or governmental  
4 organization about any investigation whatsoever challenging my residency in Storey County.

5 40. On or around December 3, 2017, the Defendant wrote the following on the Storey  
6 Teller Website:

7 Special Interests

8 The Commissioner Lance Gilman – TRIC Special Interest merry-go-round that gives  
9 Mr. Gilman and TRIC access to the Storey County check book, tax coffers, real  
10 property and special consideration regarding rules and regulations.

11 Failing to require Mr. Gilman to reside in the district he represents within Storey  
12 County.

12 41. The clear inference from the Defendant's statement is that I am not a resident of  
13 Storey County. In addition, I do not have access to Storey County Checks, tax revenues or real  
14 property.

15 42. Contrary to the Defendant's assertions, I do live in Storey County, Nevada. My  
16 address is 5 Wild Horse Canyon and I have lived there for around twelve years or more.

17 43. I certainly never committed perjury as alleged by the Defendant. The Defendant's  
18 statements are not true.

19 44. On or about August 6, 2017, the Defendant published the following false and  
20 defamatory statements on the Storeyteller Website stating that I engaged in reverse graft:

21 Back to the Pipeline Hustle.

22 When this deal is approved by Marshall McBride and Jack McGuffey, TRIC will  
23 have accomplished another spectacular job of bamboozling Storey County officials.  
24 It will mean that Storey County and Nevada Taxpayers have dumped \$100 million  
25 dollars of what can only be described as "reverse graft" directly into the pockets of  
26 the band of merry TRICsters.

25 45. In addition to the foregoing quote, the article was replete with several other false  
26 references to reverse graft on my part and my business associates.

27 46. The article then alludes to include some feeble attempt at diligence on the part of the  
28

1 Defendant to support his statements without any effort to really verify the truth.

2 47. First of all, there was and is no reverse graft as alleged by the Defendant and there  
3 is certainly no payment of \$100 million into my pockets and those of my business associates.

4 48. The Defendant's statements are not even remotely true.

5 49. The simple truth is that the TRI fronted the costs for the construction of certain  
6 infrastructure to the tune of around \$100 million free of charge and interest free.

7 50. The infrastructure included roads, drainage culverts, bridges, Interchanges, power  
8 lines, water, and sewer to name a few, all of which benefit Storey County.

9 51. Of this infrastructure, TRI dedicated at the time half to Storey County free of Charge.

10 52. Pursuant to certain formulas, Storey County is to reimburse TRI over a lengthy period  
11 of time for the portion of the infrastructure dedicated.

12 53. This payment is to come from any surplus that Storey County has from revenue  
13 generated by the TRI that includes revenues from Real and Personal Property Taxes, Room Taxes,  
14 Fuel Taxes, Franchise Fees and Business License Fees, among other types of reveunes.

15 54. The surplus or loss is calculated at the end of each year by an audit conducted by a  
16 licensed CPA.

17 55. After subtracting an agreed upon amount for expenses, which include the county  
18 payroll, maintenance costs, First Responders, and general administration, the surplus is divided with  
19 Storey County receiving approximately 65% of the surplus and TRI getting approximately 35% of  
20 the surplus as repayment for TRI's outlays for the infrastructure.

21 56. If there is no surplus, TRI eats the expense it fronted for the infrastructure.

22 57. There is no interest for TRI to carry the \$50 million.

23 58. As for the pipeline, Storey County is not paying anything upfront for it nor paying  
24 for the bond processing nor offering.

25 59. It is a new, separate \$60 million project funded by state bonds sold on Wall Street.

26 60. It is my understanding that the bond payments from the Pipeline will be funded by  
27 real and personal property taxes on new construction projects generated because of the pipeline.

28 61. In addition, the State of Nevada covers some of the cost of the bond repayments.



1           62.     Of particular import, these taxes that will be generated on new construction would  
2 not be there but for the pipeline.

3           63.     If there is no money generated from new construction, as is my understanding, TRI  
4 will have to cover the bond.

5           64.     Contrary to the Defendant's assertion, in light of a massive recent deal where over  
6 64,000 acres was sold to a tech company called Blockchains, LLC, TRI is done selling at TRI (with  
7 the exception of a few hundred acres), there is no more money to be made by TRI from land sales  
8 generated by the pipeline water.

9           65.     On or about February 2, 2017, the Defendant published the following false and  
10 defamatory statements on the Storeyteller Website stating that I didn't follow the law when the  
11 Mustang Ranch was relicensed after a related brothel was closed and then reopened as the Mustang  
12 Ranch. Specifically, the Defendant published the following statement on the Storeyteller Website:

13                     . . . . Funny thing is, the courts didn't agree and the investor won. But, in the  
14 meantime, because Lance had shut down the Wildhorse and reopened it as the  
15 Mustang, he thought he didn't need to go through the investigation that the Nevada  
16 Revised Statutes require for the opening of a new brothel. He didn't want to follow  
17 the law. The County Commissioners even agreed with him. Why should Lance, the  
18 man who's been a virtual Santa Claus (at least he tries to convince people he is) for  
19 Storey County, have to follow the law? Sheriff Antinoro said the law had to be  
20 followed and that the Mustang had to be closed for the required number of days, per  
21 state statute, for the investigation with which ALL brothels must comply.

18           66.     The Defendant's statement is not true.

19           67.     I had a lender (a company called TG Investments) who lent money in the mid 2000's.

20           68.     As part of the loan payment terms, the lender was entitled to a percentage cut of the  
21 revenue from the Wild Horse Brothel (Cash Asset Management, LLC, hereinafter "CAM").

22           69.     Under the County Code, the lender was supposed to get licensed.

23           70.     When it came time to do so, the lender was unable or unwilling to get licensed.

24           71.     This in turn required me to disclose this unlicensed lender relating to Wild  
25 Horse/CAM, which I did indeed do to comply with the law.

26           72.     The County Licensing Board rescinded the Wild Horse/CAM brothel License as it  
27 had a lender with an unlicensed financial interest, but then simultaneously granted an extension to  
28



1 the license of Cash Processing Services, LLC (Mustang Ranch) to operate out of that facility as the  
2 Mustang was not impacted by that lender.

3 73. I did follow the legal requirements precisely.

4 74. I self-reported that my lender failed to get a brothel license.

5 75. I went through a complete licensing process to include a full background check and  
6 financial review by a local CPA, all of which was supervised by my longstanding political opponent,  
7 the Sheriff, Gerald Antinoro.

8 76. In truth and fact, I disclosed in order to comply the applicable law contrary to the  
9 assertions contained in the Defendant's publication.

10 77. On or about December 3, 2017, the Defendant wrote that I am receiving land from  
11 Storey County with zero consideration. Specifically, the Defendant in the Storeyteller Website  
12 wrote:

13 Special Interests

14 The Commissioner Lance Gilman – TRIC Special Interest merry-go-round that gives  
15 Mr. Gilman and TRIC access to the Storey County check book, tax coffers, real  
property and special consideration regarding rules and regulations.

16 Repeatedly reconveying Storey County property to TRIC with zero consideration  
17 or payment that TRIC has turned around and included the free property into lucrative  
18 land deals, including the one that gave a portion of the USA Parkway to TRIC (for  
19 free) which Mr. Gilman and TRIC turned around and sold to NDOT for \$43 Million  
Dollars (without giving us a single penny or paying down the \$47 Million Dollar  
Storey County Credit Card balance).

20 78. This is not true. I, Lance Gilman, have never received title to land from Storey  
21 County in any transaction, never-not once.

22 79. In the first place, TRI built the first 5 miles of USA Parkway and dedicated a part of  
23 the road and drainage facilities to the County.

24 80. In order to bring Tesla and its Gigafactory into Storey County, TRI agreed to give  
25 Tesla 1,000 acres of land free, and give the state of Nevada land for the right of way extension from  
26 the southern end of USA Parkway to Silver Springs.

27 81. TRI received payment from NDOT for that extension right of way, which was  
28 required by law. As part of the transaction, Storey County reconveyed a small segment (less than 2

1 mi) of USA Parkway which TRI transferred in turn transferred to NDOT. This was a massive benefit  
2 for Storey County as the County was getting the Tesla Gigafactory and the massive tax and fee  
3 revenue generated in the future after the abatements ended.

4 82. Storey County was also getting a new State Highway, maintained in perpetuity by  
5 NDOT, and huge positive press, which later drew Tesla, Switch, and Google in to the County.

6 83. Out of all four parties (Tesla, TRI, NDOT, Storey County) Storey County came out  
7 of the deal in a very good financial position - without paying a single cent out of pocket.

8 84. So TRI gave up 1,000 acres of prime industrial land for free and a 400 ft wide right  
9 of way for approximately 15 miles and only received compensation for the 15 miles of right of way.  
10 The concept was that both Storey County and TRI would give up some consideration in order to  
11 secure the Tesla deal.

12 85. TRI did not get the all of USA Parkway back from the County for free, as claimed  
13 by Defendant.

14 86. There have been a couple transactions over the last couple years where Storey County  
15 deeded very small segments of land back to TRI, but in each case the land was either exchanged with  
16 other land given to Storey County, or was part of a deal where a landowner took over maintenance  
17 responsibility for a drainage area.

18 87. Further, in each case these transfers were to facilitate a company moving into TRI  
19 which is of tremendous benefit to Storey County, which would collect future tax and fee revenue  
20 from that company. Thus, the County received substantial consideration in each and every instance.

21 88. This is not a matter of opinion or conjecture as tax and/or fee revenue to the county  
22 is a certainty whenever a private owner takes title to land in TRI, even if they don't build on site as  
23 they still have to pay property taxes.

24 89. For example, take the instance where the County has title to a drainage area, the  
25 county generates no revenue on that drainage area as it is County owned.

26 90. In order to facilitate a company coming in to TRI who desires a pad or site that  
27 slightly encroaches into the drainage area, the county deeds the small encroached area back to TRI  
28 (who initially dedicated it to the County in the first place) so that TRI can include it in the sale to the



1 incoming company.

2 91. The incoming company takes title, and has to maintain the portion of the drainage  
3 facility on their property, and pays property taxes starting immediately.

4 92. Then if the company builds a facility, it generates many different forms of substantial  
5 revenue for the county, including real and personal property taxes, permit fees, business license fees,  
6 power franchise fees, etc.

7 93. The economic benefit to the County is far, far in excess of the minimal fair market  
8 value of the portion of the drainage area transferred to TRI.

9 94. Notwithstanding the foregoing, the Defendant's statements that I as an individual,  
10 have received land for free from Storey County, is a blatant and utter falsehood.

11 95. In two different posts, on or about April 29, 2017, and May 1, 2017, the Defendant  
12 on the Storeyteller Website wrote that my trip to Washington, D.C. partly paid for by Storey County  
13 was not work related and was not a legitimate trip.

14 96. The Defendant also reiterated that the trip was not legitimate on the Storeyteller  
15 Website on or about May 2, 2017.

16 97. This is not true. The trip to Washington by me was on behalf of Storey County and  
17 was taken by me and former Storey County Commissioner and current Storey County Lobbyist, Bum  
18 Hess.

19 98. There was significant lobbying by Mr. Hess and I regarding the zip code bill in  
20 Congress and meetings with Nevada Senator Dean Heller and Congressional staff regarding the  
21 same.

22 99. This was and is an issue where millions of dollars are at issue for Storey County.

23 100. Moreover, the cost of the trip to the County was minimal compared to the potential  
24 gain.

25 101. In addition, Mr. Hess and I had a lengthy private lunch and meeting with retired  
26 Congressman Jon Porter, who is the Storey County lobbyist in Washington, along with his staff.

27 102. In this meeting, Mr. Hess and I covered all the major issues where action is wanted  
28 in Congress, including the zip code issue.



1           103. On or around April 18, 2017, the Defendant wrote on the Storeyteller Website that  
2 I receive special considerations regarding the rules and regulations; specifically, the Defendant  
3 wrote: "That's irked Gilman, who appears to believe that all citizens are created equal – but he  
4 should be treated more equal than others."

5           104. In addition, on or around December 3, 2017, the Defendant wrote on the Storeyteller  
6 Website:

7                   Special Interests

8                   The Commissioner Lance Gilman – TRIC Special Interest merry-go-round that gives  
9 Mr. Gilman and TRIC access to the Storey County check book, tax coffers, real  
property and special consideration regarding rules and regulations.

10           105. This is not true. I neither expect nor receive any special consideration regarding rules  
11 and regulations.

12           106. The Defendant in his papers failed to mention a single incident where this occurred.  
13 I also don't have "access" to Storey County Checks, tax revenue or property.

14           107. On or about May 20, 2017, the Defendant wrote that I represented to him that I would  
15 reimburse the expenses incurred by Storey County, Nevada for the recall election of the Sheriff of  
16 Storey County, held in 2017, and other expenses incurred by Storey County, Nevada for the ethics  
17 investigation into the Sheriff of Storey County.

18           108. Although the Defendant may argue that this is "satire," the statements are still false  
19 and defamatory. This supposed conversation never happened. I have never made such a statement.

20           109. It implies that I have directly and improperly caused Storey County much unwarranted  
21 expense and basically embezzled funds by filing a false claim for expenses.

22           110. The Defendant's series of false and defamatory clearly impute that I am unethical and  
23 or criminally predisposed. They falsely accusing me of engaging in criminal behavior.

24           111. The Defendant's false and defamatory statements further impute my lack of fitness  
25 for trade, business or profession, falsely imputes my dishonesty, lack of fair dealing, want of fidelity,  
26 integrity or business ability, and or tend to injure me in my trade, business or profession.

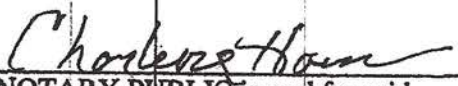
27           112. Because I am the face of TRI and other business ventures, there is no telling how  
28 much damage has been caused by the Defendant to my reputation.

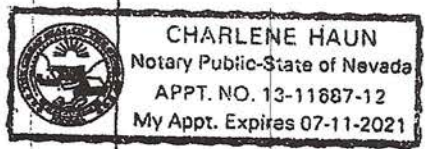
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FURTHER YOUR AFFIANT SAYETH NAUGHT.

  
LANCE GILMAN

SUBSCRIBED AND SWORN to before me  
on this 21<sup>st</sup> day of February, 2018.

  
NOTARY PUBLIC in and for said  
County and State



**Exhibit 2**

**Exhibit 2**



**All data on this form is for use by the Washoe County Assessor for assessment purposes only.**

Owner Information & Legal Description			Building Information			
APN	055-282-02	Card 1 of 1	Property Name:			
Situs	199 STEPTOE LN		Quality	R30 Average	Building Type	Sgl Fam Res
Owner 1	GILMAN, L LANCE		Stories	SINGLE STORY		
Owner 2 or Trustee			Year Built	1977	Square Feet	1,620
Owner 3 or Trustee			Weighted Average Year	1977	Square Feet does not include Basement or Garage Conversion Area.	
Mail Address Copy to Clipboard	199 STEPTOE LN		Bedrooms	3	Click here for Improvement Details (building sq ft, Yard Items, etc).	
	WASHOE VALLEY NV 89704		Full Baths	2	Finished Bsmt	0
Keyline Desc	BAER LT 9 BLK B		Half Baths	0	Unfin Bsmt	0
Subdivision	BAER SUBDIVISION		Fixtures	9	Bsmt Type	
Lot 9 Block B	Section Township 16 Range 19		Fireplaces	1	Gar Conv Sq Feet	0
Record of Survey Map : Parcel Map# : Sub Map# 668			Heat Type	FA	Total Garage Area	462
Special Property Code			2nd Heat Type		Garage Type	ATTACHED
2018 Tax Dist	4000	Prior APN --	Exterior Walls	SIDING/FR	Detached Garage	2025
2017 Tax Dist	4000	Additional Tax Info	2nd Ext Walls		Basement Gar Door	0
Tax Cap Status	Low Cap Qualified Primary Residence		Roof Cover	WOOD SHAKE	Sub Floor	WOOD
Last Activity/ Last Permit			% Complete	100	Frame	FRAME
			Obso/Bldg Adj	0	Units/Bldg	1
			Construction Modifier	0	Units/Parcel	1

Up to 7 Sales/Transfer Records/Recorded Document (additional information/records)

Grantor	Grantee	Doc #	Doc Date	DOR	Value/Sale Price	Adjusted Sale Price	Code	Notes
GILMAN FAMILY TRUST, LANCE	GILMAN, L LANCE	4599591	06/15/2016	200	0	0	3BGG	OUT OF TRUST
GILMAN, L LANCE	GILMAN FAMILY TRUST, LANCE	3667564	07/09/2008	200	0	0	3BGG	INTO TRUST
GILMAN, L LANCE & SHARON D	GILMAN, L LANCE	2925644	09/22/2003	200	0	0	3NTT	
	GILMAN, L LANCE & SHARON D	2128826	08/26/1997	200	200,000	0	2D	
		CHK	05/04/1993	200	153,000	0	2D	
		CHK	04/01/1977		40,000	0		

To view sale/transfer/or other recorded documents use EagleRecorder on the Recorder's web site.

Land Information (additional land information)		DOR Code	200	Close Code	0	IG Neighborhoods Map	
Land Use	200	Sewer	Septic	Street	Paved	Zoning	HDR Zoning Info
Size	2.744 Acre	Water	Well	Value Year	2018	Zoning Maps	Page 055-28   Book 055
							2018 Neighborhood IGBG AH
							2017 Neighborhood IGBG

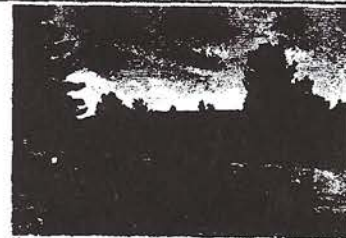
Zoning information should be verified with the appropriate planning agency.

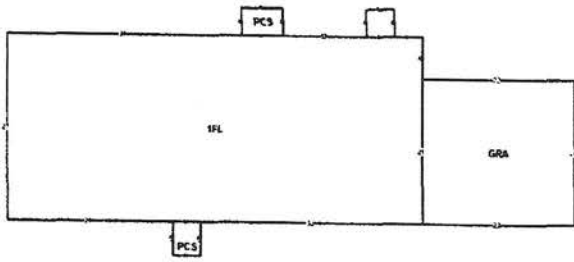
Valuation Information (additional valuation information)

2018 VN	Taxable Land	Taxable Improvement	Secured PP (rounded)	Taxable Total	Assessed Land	Assessed Improvement	Assessed Pers. Prop	Total Assessed	Supplemental New Const
2018/2019 NR	120,000	119,307	0	239,307	42,000	41,757	0	83,757	0
2017/2018 FV	110,000	121,121	0	231,121	38,500	42,392	0	80,892	0

The 2018/2019 Values are preliminary values and subject to change.

I, Cori Burke,  
 Washoe Co. Assessor, do  
 hereby certify that the above  
 is a true and  
 accurate copy of the records of the  
 Washoe County Assessor's Office.  
Cori Burke 5/17/18  
 Signature Date





sketch code descriptions

This is a true and accurate copy of the records of the Washoe County Assessor's Office as of 05/16/2018.

**Exhibit 3**

**Exhibit 3**



WASHOE COUNTY QUICK INFO (Summary data may not be complete representation of property) 02/22/2019

All data on this form is for use by the Washoe County Assessor for assessment purposes only.

Owner Information & Legal Description			Building Information			
APN	055-282-02	Card 1 of 1	Property Name:			
Situs	199 STEPTOE LN		Quality	R30 Average	Building Type	Sgl Fam Res
Owner 1	GILMAN FAMILY TRUST, LANCE		Stories	SINGLE STORY		
Owner 2 or Trustee	GILMAN TRUSTEE, LEONARD L		Year Built	1977	Square Feet	1,620
Owner 3 or Trustee			Weighted Average Year	1977	Square Feet does not include Basement or Garage Conversion Area.	
Mail Address Copy to Clipboard	1000 WILD HORSE CANYON DR		Bedrooms	3	Click here for Improvement Details (building sq ft, Yard Items, etc).	
	SPARKS NV 89434		Full Baths	2	Finished Bsmt	0
Keyline Desc	BAER LOT 9 BLOCK B		Half Baths	0	Unfn Bsmt	0
Subdivision	BAER SUBDIVISION		Fixtures	9	Bsmt Type:	
Lot 9 Block 8	Section 23	Township 16	Fireplaces	1	Gar Conv Sq Feet	0
	Range 19		Heat Type	FA	Total Garage Area	462
Record of Survey Map : 668	Parcel Map# :	Sub Map# :	2nd Heat Type		Garage Type	ATTACHED
Special Property Code			Exterior Walls	SIDING/FR	Detached Garage	2025
2019 Tax Dist	4000	Prior APN	2nd Ext Walls		Basement Gar Door	0
2018 Tax Dist	4000	Additional Tax Info	Roof Cover	WOOD SHAKE	Sub Floor	WOOD
Tax Cap Status	Low Cap Qualified Primary Residence		% Complete	100	Frame	FRAME
Last Activity/ Last Permit	AH 11/07/2018		Obso/Bldg Adj	0	Units/Bldg	1
			Construction Modifier	0	Units/Parcel	1

Up to 7 Sales/Transfer Records/Recorded Document (additional information/records)

Grantor	Grantee	Doc #	Doc Date	DOR	Value/Sale Price	Adjusted Sale Price	Code	Notes
GILMAN, L LANCE	GILMAN FAMILY TRUST, LANCE	4842096	08/15/2018	200	0	0	3BGG	
GILMAN FAMILY TRUST, LANCE	GILMAN, L LANCE	4599591	06/15/2016	200	0	0	3BGG	OUT OF TRUST
GILMAN, L LANCE	GILMAN FAMILY TRUST, LANCE	3667564	07/09/2008	200	0	0	3BGG	INTO TRUST
GILMAN, L LANCE & SHARON D	GILMAN, L LANCE	2925644	09/22/2003	200	0	0	3NTT	
	GILMAN, L LANCE & SHARON D	2128826	08/26/1997	200	200,000	0	2D	
		CHK	05/04/1993	200	153,000	0	2D	
		CHK	04/01/1977		40,000	0		

To view sale/transfer/or other recorded documents use EagleRecorder on the Recorder's web site.

Land Information (additional land information) DOR Code 200 Close Code 0 IG Neighborhoods Map

Land Use 200 Sewer Septic Street Paved Zoning HDR Zoning Info 2019 Neighborhood IG8G AM

Size 2.744 Acre Water Well Value Year 2019 Zoning Maps Page 055-28 | Book 055 2018 Neighborhood IG8G

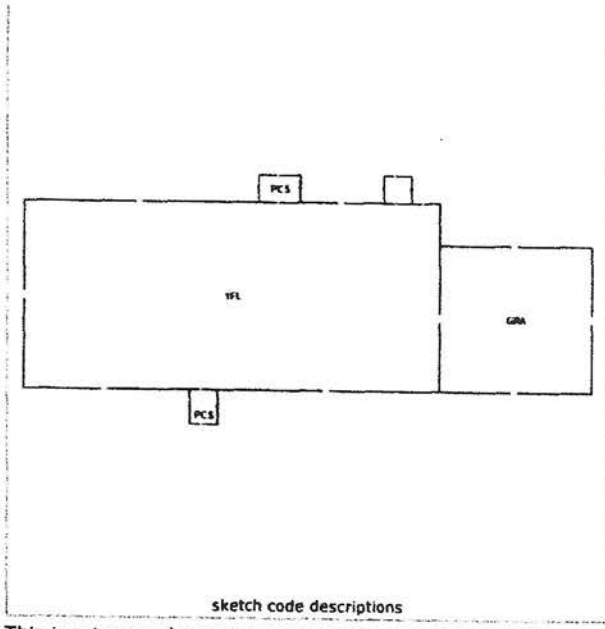
Zoning information should be verified with the appropriate planning agency.

Valuation Information (additional valuation information)

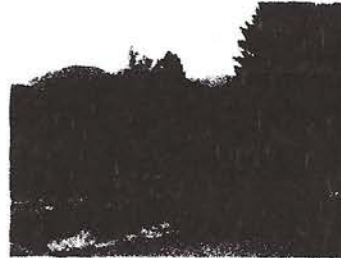
2019 VN	Taxable Land	Taxable Improvement	Secured PP (rounded)	Taxable Total	Assessed Land	Assessed Improvement	Assessed Pers. Prop	Total Assessed	Supplemental New Const
2019/2020 VN	120,000	120,404	0	240,404	42,000	42,141	0	84,141	0
2018/2019 FV	120,000	119,307	0	239,307	42,000	41,757	0	83,757	0

The 2019/2020 Values are preliminary values and subject to change.

Keirsten Beck  
 Washoe County Assessor, do hereby certify this is a true and accurate copy of the records of the Washoe County Assessor's Office.  
 Keirsten Beck 2/22/19  
 Signature Date



005-323-02 08/01/2010



sketch code descriptions

This is a true and accurate copy of the records of the Washoe County Assessor's Office as of 02/21/2019.

Keirsten Beck

Keirsten Beck  
 County Assessor  
 Washoe County  
 Assessor's Office

Keirsten Beck 2/22/19

**Exhibit 4**

**Exhibit 4**



2ND REQUEST. Another form will NOT be mailed for this property unless there is a change in ownership or mailing address.

**FILING DEADLINE: JUNE 15, 2008**  
 Due to a change the 2008/2009 "tax cap" has been set to the "HIGH CAP" and may result in a higher tax bill. Please return this form to our office by JUNE 15, 2008 to ensure the correct abatement is applied to your tax bill.  
 The High Cap for tax year 2008/2009 is 8.0%.

APN: 055-282-02  
 LOCATION: 199 STEPTOE LN  
 NAME: GILMAN, L LANCE

**FILL IN THE APPROPRIATE OVAL(S) (●) below regarding the status of the property as of July 1, 2008. The form will not be processed if oval(s) are not filled in. See instructions on reverse side.**

- This property will be occupied as my **primary residence** on July 1, 2008.  
 (NOTE: Your mobile home that you occupy qualifies as your primary residence even if you do not own the land)
- This property is occupied as the **primary residence of a family member** that does not pay rent.
- This is a **vacation home** and I:
  - Do not own another home in Nevada.
  - Own another home in Nevada.
  - Rent it out when I am not using it.
- I also own an additional parcel(s) of land that **connects or shares a boundary line** with this parcel.  
 Please provide the parcel number(s) of the parcel(s) that connect or share a boundary line with this parcel: \_\_\_\_\_

(OR)

- THIS PROPERTY IS A RENTAL**  
 Provide the following information (see reverse side for further instructions)

# of Bedrooms	Number of Rental Units of this type on the parcel	Maximum monthly rent charged for this type of unit April 1, 2007 through March 31, 2008.	Mark an "X" if Heat & Electric are included in rent.
Studio (0)			
1 bedroom			
2 bedrooms			
3 bedrooms			
4 bedrooms			
5 bedrooms			
Mobile Home Space*			

I, Cori Burke  
 Washoe County Assessor, do hereby certify that the above information is true and accurate to the records of the Washoe County Assessor's Office.  
Cori Burke 5/17/18  
 Signature Date

\*Only complete information for Mobile Home Space if you own the land.

(OR)

- NONE OF THE ABOVE APPLY**
  - This property is under construction and will not be occupied until after July 1, 2008.
  - This property is abandoned and no longer usable as a dwelling.
  - I will not own this property as of July 1, 2008.
  - This property is unoccupied and is being renovated or up for sale.
  - Other. Please explain: \_\_\_\_\_

I affirm and certify under penalties pursuant to law that I am the owner of this property, the above information is true and accurate, and I will notify the Assessor's Office if this property is no longer used as described above.

SIGNED [Signature] Date 7-1-08 Daytime Phone # 775-412-7681

You will not receive the lower tax cap unless form is signed by the owner or their legal representative. You can verify your status at [www.washoecounty.us/assessor/cama](http://www.washoecounty.us/assessor/cama) or on your tax bill.  
**DEADLINE TO APPEAL 2008/2009 ABATEMENT IS JANUARY 15, 2009.**

This section is for use by the Washoe County Assessor's Office only.

- QLC
- QHC
- QLCR
- QHCR
- DNQ
- NS

**Exhibit 5**

**Exhibit 5**

A.P.N.: 055-282-02  
File No: 121-2503321 (MLR)  
R.P.T.T.: \$0

**DOC #4599591**  
06/15/2016 11:04:02 AM  
Electronic Recording Requested By  
FIRST AMERICAN TITLE RENO  
Washoe County Recorder  
Lawrence R. Burtness  
Fee: \$18.00 RPTT: \$0  
Page 1 of 2

When Recorded Mail To: Mail Tax Statements To:  
L. Lance Gilman  
199 Steptoe Lane  
Washoe Valley, NV 89704

***GRANT, BARGAIN and SALE DEED***

*FOR A VALUABLE CONSIDERATION*, receipt of which is hereby acknowledged,

Leonard Lance Gilman, Trustee of the Lance Gilman Family Trust dated November 9, 2007

do(es) hereby *GRANT, BARGAIN and SELL* to

L. Lance Gilman, an unmarried man

the real property situate in the County of Washoe, State of Nevada, described as follows:

**LOT 9 IN BLOCK B, OF BAER SUBDIVISION, WASHOE COUNTY, NEVADA, ACCORDING TO THE MAP THEREOF, FILED IN THE OFFICE OF THE COUNTY RECORDER OF WASHOE COUNTY, STATE OF NEVADA, ON OCTOBER 24, 1960, AS TRACT MAP NO. 668.**

Subject to

1. All general and special taxes for the current fiscal year.
2. Covenants, Conditions, Restrictions, Reservations, Rights, Rights of Way and Easements now of record.

*TOGETHER* with all tenements, hereditaments and appurtenances, including easements and water rights, if any, thereto belonging or appertaining, and any reversions, remainders, rents, issues or profits thereof.

Date: 05/31/2016



Leonard Lance Gilman, Trustee  
of the Lance Gilman Family Trust dated November 9, 2007

*Leonard Lance Gilman*  
Leonard Lance Gilman, Trustee

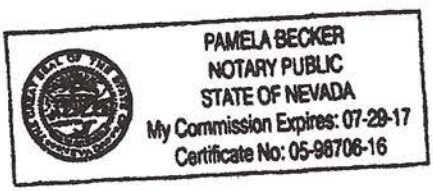
STATE OF NEVADA )  
COUNTY OF WASHOE ) :ss.

This instrument was acknowledged before me on this:  
13 day of JUNE, 2016

By: Lance Gilman

*Pamela Becker*

Notary Public 7/29/17  
(My commission expires: 7/29/17)



**CERTIFIED COPY**  
THE FOREGOING DOCUMENT IS A FULL,  
TRUE AND CORRECT COPY OF THE  
RECORD IN THE OFFICE OF THE COUNTY  
RECORDER, WASHOE COUNTY, NEVADA.  
WITNESS MY HAND AND SEAL THIS  
13th DAY OF June, 2016  
LAWRENCE R. BURTNES, COUNTY RECORDER  
BY: *Alan Stinson* DEPUTY  
Per NRS 290B the SSN may be redacted, but in no way  
affects the legality of the document.