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Acting in a Pro Bono capacity

CASE NO: A-25-931669-B
Department 31

DISTRICT COURT

CLARK COUNTY, NEVADA

VEGAS PET RESCUE PROJECT, a Nevada nonprofit corporation, Plaintiff, v. JAMIE GREGORY, individually and in her capacity as former board member and former Executive Director of Vegas Pet Rescue Project; DOES I-X; and ROE BUSINESS ENTITIES XI-XX, inclusive, Defendant(s).	Case No.: Dept. No.: **COMPLAINT** **Exempt from Arbitration: Declaratory Relief Requested** **(Business Court)**

Plaintiff VEGAS PET RESCUE PROJECT, a Nevada nonprofit corporation ("Plaintiff"), by and through its undersigned counsel, hereby alleges and asserts its Complaint against Defendant JAMIE GREGORY ("Defendant"), as follows:

NATURE OF THE ACTION

1. In Southern Nevada, and especially Las Vegas, there is a significant animal crisis.

2. Animal abandonment and a surge in stray animals have led to critical overcrowding situation at all local shelters and rescues.

3. The Animal Foundation, the Clark County's only open-admission shelter, has had a sharp increase in animal intakes.

4. This has led to overcrowding, which strains the capacity and has led to a higher risk of disease, behavioral issues, and potential euthanasia for space.

5. Private rescues, such as the Vegas Pet Rescue Project, attempt to assist by providing assistance through fostering, adoption, and veterinary care where needed.

6. Vegas Pet Rescue Project also finances a spay and neuter program to help decrease overpopulation.

7. This mission has been compromised by the Defendant, who is currenlty holding hostage the organization and exposing it to the loss of its tax exempt and nonprofit status.

8. The current Board of Directors of VPRP were forced to make a very difficult decision and authorize this action to preserve and safeguard VPRP.

PARTIES, JURISDICTION, AND VENUE

9. Plaintiff VEGAS PET RESCUE PROJECT, a Nevada nonprofit corporation ("VPRP") is a Nevada nonprofit corporation formed and existing under the laws of the State of Nevada and doing business in Clark County, Nevada. VPRP is also a tax exempt 501(c)(3) entity.

10. Upon information and belief, Defendant Jamie Gregory is a resident of State of Nevada. Ms. Gregory is the organizer of VPRP and served as its Executive Director.

11. Pursuant to Rule 10(a) of the Nevada Rules of Civil Procedure, *Nuremberger Hercules-Werke GMBH v. Virostek*, 107 Nev. 873, 822 P.2d 1100 (1991), and other applicable law, Plaintiff sues the defendants designated herein as DOE, the true names and capacities of whom are unknown to Plaintiff at this time. Plaintiff is informed and believes, and thereon alleges, that defendants designated as DOE herein were in some manner involved in, and/or are responsible for, the acts, omissions, events, happenings, and/or offenses alleged in this Complaint, and/or directly and proximately caused or are responsible for the damages and/or relief sought herein, including, without limitation. Plaintiffs will seek leave of Court to amend this Complaint to name the defendants designated as DOE herein when their true names and capacities are ascertained.

12. This Court has jurisdiction over this matter and venue is proper because Plaintiff is a Nevada nonprofit corporation.

13. Jurisdiction and venue are proper in this Court pursuant to NRS 14.065, NRS 13.010, and NRS 13.040.

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GENERAL ALLEGATIONS

1. VPRP was formed in December 2017, with Defendant acting as the incorporator.

2. By February 2018, VPRP had been approved as a tax-exempt entity under Internal Revenue Code ("IRC") Section 501(c)(3)

3. Also in 2018, Defendant, on behalf of VPRP, approached Samantha Bracchi, who has since married and changed her name to Samanth Svast, and Tina Hayes to join the board of directors of VPRP – each accepted the offer to join the board.

4. Additionally, Defendant appointed herself as "Executive Director" of VPRP.

5. From the inception of VPRP, until recently, corporate formalities were not followed: for example, regular meetings were not held, minutes of meetings were not created, and all action on behalf of VPRP was taken informally through discussion, phone calls, email, and messaging.

6. At the beginning of 2023, on February 23,2023, Samantha Curtis was added by Defendant to the "VPRP Angels" chat group on Facebook Messenger, which was the chat group for the board of directors at that time.

7. Although never formally asked, Ms. Curtis understood Defendant had requested she join the board and had accepted that invitation.

FORMATION OF THE CURRENT BOARD

8. In December 2024, at a Christmas party for VPRP, Jamie Gregory, Samantha Svast, Tina Hayes, Samantha Curtis, Lindsey Pinapfel, and Rachel Brannon were sitting at a table when a discussion about the board of directors for VPRP was had.

9. Samantha Svast and Tina Hayes were already on the board formally since 2018, Samantha Curtis had been added informally in 2023, and Lindsey Pinapfel, Rachel Brannon were asked to join the board of directors during that impromptu meeting (the "2024 Christmas Meeting").

10. At the 2024 Christmas Meeting, Defendant and the other board members all discussed and agreed the composition of the board of directors for 2025 would be Jamie

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Gregory, Samantha Svast, Tina Hayes, Samantha Curtis, Lindsey Pinapfel, and Rachel Brannon (the "Board").

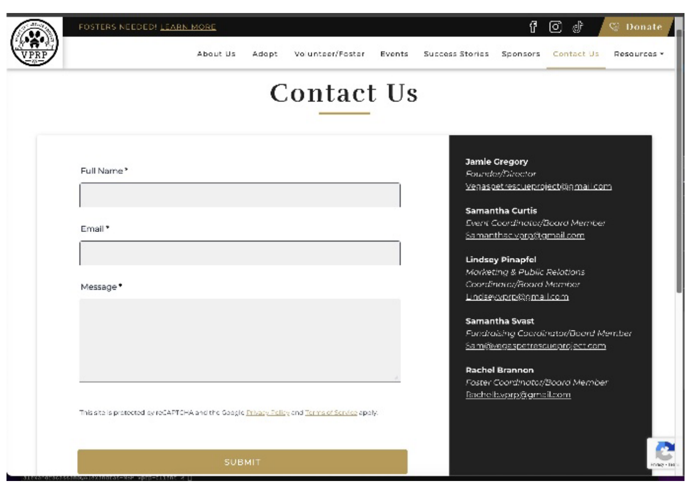
11. No one objected to any member of the Board, and all agreed to serve on the Board during that impromptu meeting.

12. After the 2024 Christmas Meeting, in March 2025, the Board discussed specific duties of each Board member, such as who on the Board was to be responsible for fosters, adoptions, fundraising, etc.

13. For example, it was discussed that Samantha Curtis would be responsible for events, Samantha Svast would be responsible for fundraising, Lindsey Pinapfel would be responsible for marketing, Rachel Brannon would handle adoptions along with Tina Hayes.

14. In April 2025, Defendant requested that the VPRP website be updated with the names and contacts of the Board:

15. The VPRP website was therefore updated with Board member information:



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CORPORATE FORMALITES – FIRST FORMAL BOARD MEETING

16. Through the beginning of 2025, there were discussions amongst the Board about need to formalize the actions of VPRP.

17. There are numerous text messages, emails, and other such communications between the Board, including many where Defendant refers to each of the individual board members as "Board Members" or "members of the Board."

18. The Board discussions about formalities were emphasized especially since VPRP was planning to grow and expand VPRP under the Board.

19. As such, a formal Board meeting was noticed for May 30, 2025.

20. On May 30, 2025, the first ever formal Board meeting of VPRP was held at the home of Rachel Brannon, at 6:30 pm.

21. The May 30, 2025, VPRP Board meeting was attended by all Board members: Jamie Gregory, Samantha Curtis, Samantha Svast, Lindsey Pinapfel, Rachel Brannon, and Tina Hayes.

22. For the Board meeting, there was a formal agenda circulated prior to the meeting, which named all Board members and their positions.

23. After some preliminary discussions, the Board meeting was formally called to order at 7:41 pm and lasted over three and a half hours.

24. At the start of the meeting, it was asked if anyone had any changes to the Agenda, to which all responded "no."

25. On the agenda for the meeting was a discussion of the bylaws for VPRP since VPRP never had any formal or adopted bylaws.

26. The May 30, 2025, Board meeting lasted over three and a half hours adjourning at 11:33 pm.

27. The May 30, 2025, Board meeting was recorded via audio recording.

28. Prior to the Board meeting, Defendant provided some proposed bylaws for the Board to discuss, which she said she had "googled."

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29. The proposed bylaws were circulated prior to the meeting for review prior to the meeting and discussion at the meeting.

30. The bylaws proposed by Defendant, however, stated that they had been adopted at a meeting held December 20, 2022 – which was inaccurate since the names of board members included those who had just joined at the 2024 Christmas Meeting.

31. Defendant has admitted those bylaws were never formally adopted, which is confirmed by both Ms. Svast and Ms. Hayes who were board members in 2022, as well as the metadata for the document demonstrate it was created in 2023.

32. During the meeting, portions of the proposed bylaws were adopted by the Board, but portions concerning whether the Executive Director could be part of the Board and compensation of any "paid positions" were not approved.

33. These issues (whether the Executive Director could be a board member and compensation) were instead tabled for a later meeting because the discussion at the Board meeting centered around whether a Board member could be compensated and whether a Board member could also serve as the Executive Director.

34. The Board agreed to look at Nevada law on the issue and reconvene.

35. At the Board meeting, Defendant stated she had been "flying by the seat of her pants" previously and that the meeting was the most formal VPRP had been since its inception.

36. Defendant advocated for remaining the Executive Director, that she should be compensated, and that she wanted to also remain on the Board.

37. The other Board members wanted to ensure they followed what the law allowed, which is why that portion of the bylaws were not approved and instead were tabled for discussion after the Board was able to inquire into Nevada law.

38. Other topics aside from the bylaws were discussed, as were included on the Agenda and circulated among the Board prior to the meeting, including coordinator positions and the job description for the Executive Director.

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39. The Board took formal action on items at the May 30, 2025, Board meeting through recorded vote and adjourned with the intent to reconvene to complete discussions concerning the bylaws.

ANONYMOUS EMAILS AND REPORTER CONTACT

40. Shortly thereafter, Boad members began receiving emails concerning the lack of VPRP's corporate governance and lack of transparency by Defendant.

41. The Board learned that the person emailing had been contacting Defendant with no response, which is why the person then started emailing the remainder of the Board.

42. In a specific email, the person noted that: "there are potential indicators of self-dealing and personal benefit by the organization's founder and leadership, which, if accurate, would undermine the public trust and conflict with IRS rules for tax-exempt entities."

43. The email continued that "While the organization has no doubt played a role in supporting animals and serving the community, such positive contributions do not exempt it from legal obligations."

44. The email stated that the person was going to submit a formal complaint to governmental agencies.

45. Thus, these issues became paramount for the Board to address.

46. Nevertheless, when the Board attempted to discuss these issues with Defendant, Defendant became very defensive and resistant to even discussing the issues.

47. Defendant stated she was getting legal counsel from an attorney and VPRP was doing nothing wrong - this, however, turned out to be inaccurate.

48. By the end of September / beginning of October 2025, a reporter had reached out to Defendant asking about the governance of VPRP.

49. Defendant communicated with the reporter, stating she could review their tax filings online using GuideStar.org and that internal financial and accounting documents would not be provided.

50. The reporter asked Defendant about certain expenses, such as 2023 expenses of $18,281.00 for "Conferences, conventions, and meetings" in Section IX line 19, to which

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Defendant responded it was an "accounting error" and was actually a payment to a gold course for a fundraiser, and that she would send proof of the expense.

51. Based on information and belief, Defendant never sent any proof of the expense as promised.

52. Defendant stated to the reporter there was a valid board of directors, but falsely stating VPRP had bylaws.

53. Defendant sent a version of the bylaws that was different from the one discussed at the May 2025 Board meeting, which was obviously not approved by the Board.

54. When the reporter questioned Defendant about the fact that the bylaws do not allow for the Executive Director, which is a compensated position, to also be on the Board, that is not compensated, Defendant responded: "We can amend that I guess if needed . . . ."

55. The reporter informed Defendant that her position was "fraught with conflict" and should be a non-voting position.

56. When asked how the Board can supervise her in her Executive Director Position, Defendant responded: "Is there not a section for that?"

57. The reporter also asked about Defendant's compensation as the bylaws Defendant sent stated she was paid $20 per hour.

58. Defendant's response was that the Board was changing that as it should be a salary of $78,000 a year.

59. When asked how a position that worked 30 hours a week justified that salary, Defendant stated she was unaware of the fact she signed multiple tax returns stating she worked 30 hours per week (Form 990 Section VII).

60. Defendant has never corrected her inaccuracies and misrepresentations to the reporter nor provided the promised documentation.

VPRP LEGAL REPRESENTATION

61. With all of the issues being created by the Defendant, the Board asked Defendant about the attorney she had sought advice from after the emails, but the Board learned Defendant had not gotten advice from legal counsel.

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62. The Board all agreed they needed to seek legal counsel due to the various emails and now reporter contacting them about the governance and finances of VPRP.

63. The Board informed Defendant that they needed to be involved in the discussions with an attorney and that an attorney cannot be retained by VPRP without the approval of the Board.

64. Nevertheless, Defendant contacted an attorney herself without involvement of the Board.

65. Defendant represented that she was contacting the attorney on behalf of VPRP, and provided the attorney with bylaws – representing that the bylaws were those of VPRP.

66. The bylaws Defendant provided to the attorney, however, were never approved by the Board.

67. Moreover, the bylaws Defendant provided the attorney were even different than the bylaws presented to the Board for the May 30, 2025, meeting.

68. Defendant did not inform the attorney the bylaws she provided had never been adopted by the Board, despite the fact the document states they were adopted at a board meeting on December 20, 2022, by board members Jamie Gregory, Tina Hayes, and Samantha Bracchi.

69. Based on her review of the bylaws and discussions with Defendant, the attorney issued a letter on behalf of VPRP based on the bylaws provided by Defendant, opining the salary paid to Defendant was appropriate – presumably so Defendant could provide the "legal" letter to the reporter who was questioning her compensation and status with VPRP.

70. The legal letter, however, was based on inaccurate information.

71. For example, the letter was based on the bylaws that had not been adopted by VPRP or the Board.

72. The letter also contained the inaccurate compensation of Defendants as Executive Director.

73. The letter was also based on a portion of the bylaws that requires the Board to approve the compensation of the Executive Director.

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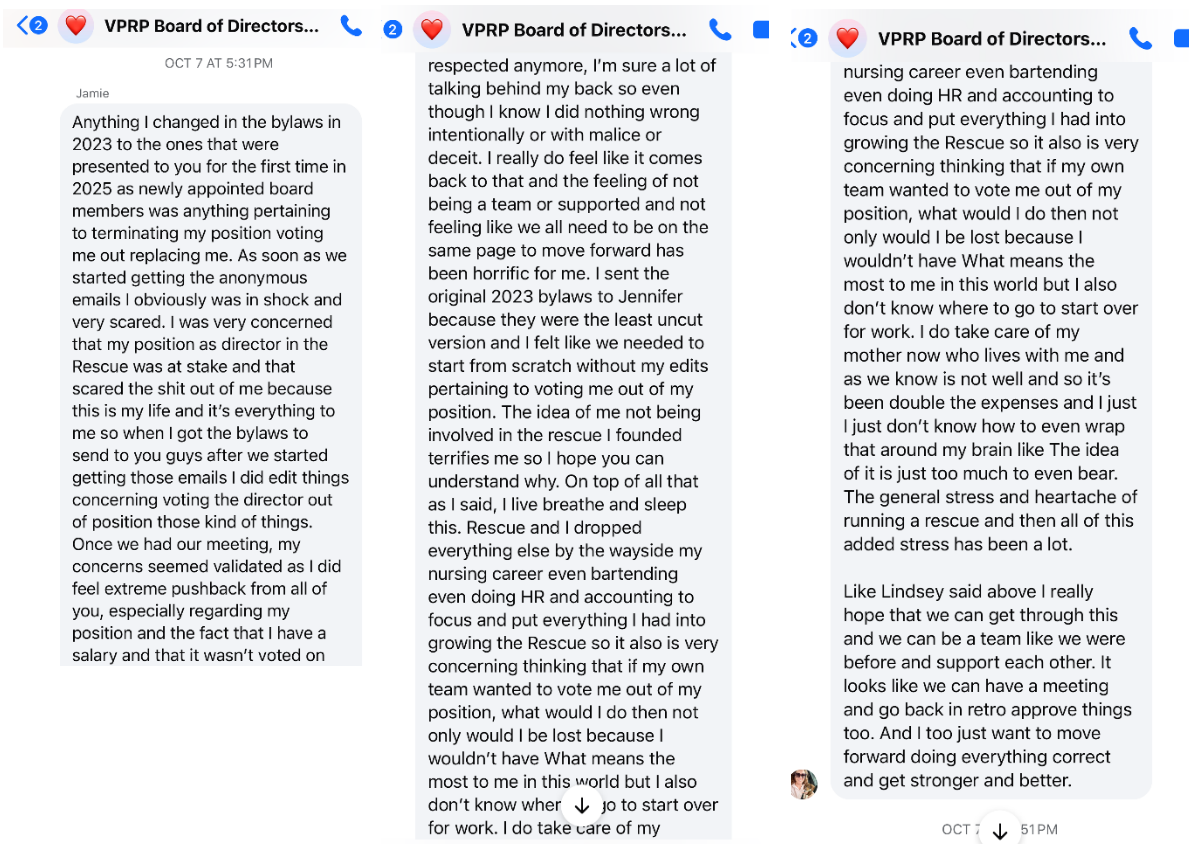
74. As such, the letter was also inaccurate as the Board had never approved the Defendant's compensation, nor had Defendant's compensation ever been formally approved by VPRP or its board of directors.

75. When the Board got the letter, they informed Defendant that the bylaws she provided had not been adopted and that they all wanted to be able to have a discussion with the attorney who was supposed to be representing VPRP.

76. The attorney, however, was going on vacation and not available to speak with the Board until November.

77. When the Board confronted Defendant about providing inaccurate information to the attorney, Defendant stated she did so because she was concerned about her Executive Director (paid) position in VPRP because she understood the Board could act to change her position, or even her compensation:



78. Defendant continued to push a time to meet with the attorney she had selected, but there was no time available for the Board to meet with the attorney before she left on vacation and would not be free until November.

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79. Defendant was getting more and more defensive about the Board meeting to discuss the Executive Director position.

80. Since receiving the email, the Board has been discussing the need for more formalities, including the finances of VPRP and the reporter contact simply made it urgent.

81. As such, and because of the latest issues with the reporter and Defendant's dishonesty, the Secretary (Tina Hayes) and Treasurer (Samantha Svast) visited VPRP's bank (Chase Bank) to ensure they were added to the bank account.

DEFENDANT'S USE OF CHARITBALE FUNDS FOR PERSONAL EXPENSES

82. Until this time, Defendant had sole control over all finances of the organization, and it was not even until the May 30, 2025, Board meeting that Samantha Svast knew she has been appointed as Treasurer by Defendant in the Secretary of State filings.

83. After obtaining access to VPRP's bank account, the Board began reviewing recent transactions and noticed charges that should not be paid by VPRP.

84. The Board therefore began reviewing historical statements of VPRP.

85. It was at that time the Board learned Defendant had been using money from the VPRP bank account to pay personal expenses.

86. These personal expenses included: personal cell phone, subscriptions to Amazon Prime Video, Amazon Music, and Amazon Digital, Defendant's Ring® doorbell subscription, food for Defendant's personal pets, personal trips (car rental and gas), as well as charges for food and gas while Defendant was on vacation at Disney World in Orlando, Florida.

87. As of 2025, Defendant has used VPRP funds to pay for $5,444,26 in personal expenses that the Board can readily identify.

88. There are also $7,023.86 in transfers or amounts paid that do not appear to be related to VPRP, but for which the Board is unsure of the purpose.

89. Defendant has also compensated herself $68,938.20 through September 2025 in salary and benefits – if continued that would total $91,917.60 if the same amounts were being paid through the end of 2025.

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90. In 2024, Defendant paid at least $5,337.10 in personal expenses using VPRP funds, paid herself $86,896.74 in compensation, and there are $19,979.10 in questionable expenses – including a $10,000 transfer to "US Bank 2157" in February 2024, which is not a VPRP account, and other similar transfers made to this same account.

91. As a result of the finding, the VPRP Board sent a request to VPRP's CPA requesting all financial records.

92. The Board noticed a meeting for the Board to formally address these financial issues and address the bylaws and compensation.

OCTOBER 23, 2025, BOARD MEETING

93. The Board noticed a formal Special Meeting for October 23, 2025, at 6:00 pm.

94. Defendant responded to the notice of meeting by taking the position that VPRP has never followed any corporate formalities; thus, the Board was not "lawfully constituted or ratified" and therefore she would not attend.

95. Defendant refers to herself as the "Founder" with sole and exclusive authority to determine all matters related to VPRP, including who could be on the board of directors, how VPRP will be operated, and who would be allowed access to information. In short, she alone has all powers of VPRP.

96. More importantly, Defendant began taking action to remove the access of the Board from any VPRP accounts.

97. This included removing Board access from social media, applications that handle the animal records, fostering, and adoption.

98. Defendant removed the Board members from the website.

99. Defendant removed the Board's email access so they were unable to even access their VPRP email.

100. Moreover, despite claiming that Defendant only ever updates the Nevada Secretary of State filings at the end of each year, she filed an improper Amended List removing everyone except her from the Secretary of State records.

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101. The properly noticed Board meeting was held with the five (5) members of the Board (as Defendant refused to attend) who were empowered to act as a majority at that meeting on October 23, 2025.

102. Because Defendant chose not to attend and based on the information the Board had at that time, Defendant was unanimously removed from the Board and her position as Executive Director was terminated.

103. Further, the Board had the Secretary of State filings updated to reflect the correct composition of VPRP.

104. The Board also had filed a complaint with the Secretary of State concerning the improper and inaccurate filing made by Defendant listing herself as the sole Director and President of VPRP.

105. VPRP is currently listed as active but "on hold" due to a compliance review by the Secretary of State.

106. The Board thereafter had legal counsel send a letter to Defendant requiring she cooperate with the Board.

107. Defendant refused and has not responded to the letter – however, the attorney Defendant had represented VPRP sent a letter adopting Defendant's position rather than that of the Board and threatening legal action against the Board members personally.

FALSE AND FRAUDULENT FILINGS BY DEFENDANT

108. Following the Board's Secretary of State filing, and before the Secretary of State put the entity "on hold" because of the complaint concerning Defendant's improper actions, Defendant filed more filings, including an amended list naming her as the President, and an alleged amendment to the corporate articles, although no amended corporate articles were filed.

109. Additionally, after a more thorough review, it is apparent Defendant has made other inaccurate filings with the Nevada Secretary of State.

110. For example, each year Defendant filed a required Charitable Solicitation Statement, which requires a disclosure of finances by the entity and is based on the amounts disclosed in the entity's 990 tax filings.

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111. Each year, however, Defendant filed the exact same Charitable Solicitation Statement, with inaccurate financial information.

112. More important, Defendant filed inaccurate tax returns for VPRP.

113. Of course, when asked to disclose how many voting members were part of the organization in 2023, Defendant stated “4” (see line 3 of the 2023 Form 990), which was accurate as at that time Defendant, Ms. Curtis, Ms. Hayes, and Ms. Svast were the four (4) members of the board of directors for VPRP at the end of 2023.

114. Nevertheless, on line 4 of the 2023 Form 990 when asked how many of those members were “independent voting members,” Defendant indicated “4.”

115. This, of course, is inaccurate as the IRS makes clear that any person who receives compensation “as an officer or other employee of the organization” is not and cannot be considered an independent voting member. See Form 990 Instructions for Section VI Line 1b.

116. Moreover, Defendant hides her compensation on Form 990 and has for every year that she has been compensated, since 2018, stated in Section VII that her compensation was \$0.

117. Indeed, in 2022 and 2023, VPRP lost <\$61,418> and <\$61,463> respectively, while Defendant’s compensation in those years totaled \$91,151.73 and \$82,055.70, respectively.

118. This, of course, does not include the personal expenses that were paid by Defendant from VPRP funds.

119. In short, Defendant has generally operated VPRP as her personal and private fiefdom, exposing VPRP to substantial damage and risk of losing its tax-exempt status and ability to provide rescue services.

120. This is, of course, critical as VPRP serves a vital community interest in rescuing animals in Southern Nevada, including, as stated above, preventing overcrowding, disease, and euthanasia of innocent animals.

121. Currenlty, VPRP is responsible for about 80 animals in foster, boarding, or other situations.

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122. The actions of Defendant jeopardizes the mission of VPRP, and ultimately has a substantial negative effect on the community as a whole.

FIRST CAUSE OF ACTION

Declaratory Relief

123. Plaintiff repeats and realleges the allegations set forth in the preceding and subsequent paragraphs as though fully set forth herein.

124. NRS 30.040(1) provides that "[a]ny person interested under a deed, written contract or other writings constituting a contract, or whose rights, status or other legal relations are affected by a statute, municipal ordinance, contract or franchise, may have determined any question of construction or validity arising under the instrument, statute, ordinance, contract or franchise and obtain a declaration of rights, status or other legal relations thereunder."

125. Declaratory judgment is appropriate when there is a justiciable controversy between two or more parties concerning the rights, status, or legal relationship of those parties under a contract, statute, or other writing.

126. An actual justiciable controversy has arisen between Plaintiff on the one hand, and Defendant, on the other hand, concerning the governance of a nonprofit charitable organization.

127. Defendant has taken the position that the Board is not "lawfully constituted or ratified . . . under Nevada nonprofit law" because there are no "recorded minutes" approved by Defendant as the "Founder."

128. This, of course, is contrary to the facts as set forth herein, as well as contrary to Nevada law.

129. Nevada law provides that no one owns a nonprofit corporation formed under NRS 82.

130. Nonprofit organizations "must be managed by a board of directors or trustees" and the board has the "full control over the affairs of the corporation."

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131. As set forth above, there are numerous documents evidencing the makeup of the Board as legally established and recognized – including an audio recording of the Board meeting held May 30, 2025.

132. The Board is currenlty comprised of Samantha Svast (Bracchi), Tina Hayes, Samantha Curtis, Rachel Brannon, and Lindsey Pinapfel.

133. The Board meeting held October 23, 2025, was officially noticed and valid under Nevada law.

134. The action taken by the Board on October 23, 2025, is valid under Nevada law.

135. Nevada law does not support Defendant's assertion that because she is "Founder" almost eight years ago that she can take unilateral action on behalf of the nonprofit corporation and remove Board members or take sole control of a nonprofit entity.

136. The facts are not in dispute and the only controversy is the rights of Defendant to control Vegas Pet Rescue Project which is ripe for judicial review.

137. The Court should therefore declare the Board and its actions proper under Nevada law and order Defendant to:

a. Provide unfettered administrative access to all financial accounts of VPRP, including credit cards, Venmo, PayPal, and any other financial account belonging to VPRP, as well as QuickBooks financial reporting system for VPRP.

b. Provide unfettered administrative access to VPRP's employment information and payroll system, including Paycom and any and all other records related to employment with VPRP or payments to independent contractors.

c. Provide all financial records including receipts, tax filings, expenses, income, and the like.

d. Provide unfettered administrative access to all vendor accounts, including, but not limited to, Amazon and Chewy.

e. Provide the original title to the 1950 Mercury VIN #0074H5047079 and the 2003 motorcycle VIN#AZ382203 donated to VPRP signed by Defendant transferring title to VPRP.

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f. Provide unfettered administrative access to all social media accounts of VPRP, including, but not limited to, Facebook and Instagram.

g. Provide unfettered administrative access to VPRP website and all associated email accounts, including Vegaspetrescueproject@gmail.com.

h. Provide unfettered administrative access to all VPRP applications, including, but not limited to, ShelterLuv, Truthfinder, 24PetWatch (and all microchips), Adopt A Pet, Pet Finder, and AXS.

i. Provide all information, including contact information, for all VPRP sponsors and donors.

j. Provide all information, including contact information, for all vets/medical providers for VPRP.

k. Provide all information, including contact information, for all partnerships with VPRP, including, but not limited to, TAF and Cuddly.

l. Provide all information on all animals in foster or under the care of VPRP, including medical records.

m. Turn over all VPRP property, including all property currently being stored in Defendant's garage or wherever kept, to include all supplies and food for the animals in VPRP care.

138. Plaintiff was forced to bring this action to determine the rights or duties under the Nevada law, therefore the prevailing party in such proceedings may recover a reasonable attorneys' fee to be fixed by the court, in addition to court costs and any other relief awarded by the court in such proceeding.

SECOND CAUSE OF ACTION

Breach of Fiduciary Duty

139. Plaintiff repeats and realleges the allegations set forth in the preceding and subsequent paragraphs as though fully set forth herein.

140. Defendant owed a fiduciary duty to Vegas Pet Rescue Project.

141. Plaintiff sustained damages as a proximate cause of the breach.

142. Plaintiff was forced to bring this action therefore the prevailing party in such proceedings may recover a reasonable attorneys' fee to be fixed by the court, in addition to court costs and any other relief awarded by the court in such proceeding.

THIRD CAUSE OF ACTION

Conversion of Charitable Funds for Personal Gain

143. Plaintiff repeats and realleges the allegations set forth in the preceding and subsequent paragraphs as though fully set forth herein.

144. Defendant committed distinct acts of dominion wrongfully exerted over Plaintiff's charitable funds; and

145. The act was in denial of, or inconsistent with, Plaintiff's title or rights therein, or the act was in derogation, exclusion, or defiance of Plaintiff's title or rights in the charitable funds.

146. Plaintiff was forced to bring this action therefore the prevailing party in such proceedings may recover a reasonable attorneys' fee to be fixed by the court, in addition to court costs and any other relief awarded by the court in such proceeding.

FOURTH CAUSE OF ACTION

Conversion of Personal Property

147. Plaintiff repeats and realleges the allegations set forth in the preceding and subsequent paragraphs as though fully set forth herein.

148. Defendant committed distinct acts of dominion wrongfully exerted over Plaintiff's personal property; and

149. The act was in denial of, or inconsistent with, Plaintiff's title or rights therein, or the act was in derogation, exclusion, or defiance of plaintiff's title or rights in the personal property.

150. Plaintiff was forced to bring this action therefore the prevailing party in such proceedings may recover a reasonable attorneys' fee to be fixed by the court, in addition to court costs and any other relief awarded by the court in such proceeding.

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FIFTH CAUSE OF ACTION

Embezzlement/ Theft

151. Plaintiff repeats and realleges the allegations set forth in the preceding and subsequent paragraphs as though fully set forth herein.

152. Defendant was legally entrusted with the property of Plaintiff through a fiduciary relationship.

153. Defendant intentionally took the property for her own use, rather than for the benefit of VPRP as a nonprofit tax exempt organization.

154. Defendant had a dishonest intent to fraudulently take the personal property and funds of Plaintiff.

155. Pursuant to NRS 41.580, Plaintiff may recover treble the amount of any damage the owner suffered together with the costs in the action and reasonable attorney's fees.

SIXTH CAUSE OF ACTION

Unjust Enrichment

156. Plaintiff repeats and realleges the allegations set forth in the preceding and subsequent paragraphs as though fully set forth herein.

157. Defendant unjustly retained the money or property of another against fundamental principles of justice or equity and good conscience.

SEVENTH CAUSE OF ACTION

Injunction/ Appointment of Independent Trustee

158. Plaintiff repeats and realleges the allegations set forth in the preceding and subsequent paragraphs as though fully set forth herein.

159. The organization and its assets and property are in immediate danger of being wasted, hidden, or significantly harmed.

a. Defendant has locked out the Board members from social media and their access must be restored with an injunction prohibiting Defendant from changing access, posting, or using the social media accounts of VPRP.

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b. Defendant has closed the VPRP bank account and removed the remaining funds belonging to VPRP and should be enjoined from exercising unlawful dominion over the funds to be returned to an account set up in VPRP name with the lawful Treasurer and Secretary as signatories to the account.

c. Defendant has improperly made fraudulent and/or inaccurate filings with the Secretary of State and should be enjoined from filing anything further.

d. Defendant has refused to provide access to applications required to ensure animals are fostered, adopted, obtain veterinary care, or food and other supplies and should be required to restore access and enjoined from further interference in the operation of VPRP.

e. Defendant is in possession of VPRP property and not allowing the Board members to distribute things like food and supplies as necessary and as has historically been done; thus, Defendant should be enjoined from wasting the property and required to turn over all property to the Board for the operation of VPRP.

160. Defendant should be enjoined from hiding, hindering, wasting, or keeping VPRP property from the Board.

161. Defendant should be enjoined from making any filings in the name of VPRP including with the Nevada Secretary of State or the IRS.

162. In the alternative, the Court should appoint an independent trustee to manage the affairs of VPRP to prevent further damage to VPRP and imminent risk of harm or loss.

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PRAYER

WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

1. For declaratory judgment as set forth above;

2. For damages as set forth herein;

3. For punitive and special damages;

4. For attorneys' fees and costs;

4. And for such other and further relief as the court deems just and proper.

DATED this 29 October 2025.

/s/ Sean D. Thueson

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