

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>Robert R. Lux (CA Bar No. 189191)</b> 1350 Front Street, #2034 San Diego, CA 92101 (Robert.Lux@dbo.ca.gov) TELEPHONE NO.: 619-525-3729 FAX NO. (Optional): 619-525-4045 ATTORNEY FOR (Name): People of the State of California	<b>FOR COURT USE ONLY</b>  <b>ELECTRONICALLY FILED</b> Superior Court of California, County of San Diego  <b>02/05/2020</b> at 01:39:00 PM Clerk of the Superior Court By Lee McAlister, Deputy Clerk
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO</b> <input checked="" type="checkbox"/> CENTRAL DIVISION, HALL OF JUSTICE, 330 W. BROADWAY, SAN DIEGO, CA 92101 <input type="checkbox"/> EAST COUNTY DIVISION, 250 E. MAIN ST., EL CAJON, CA 92020 <input type="checkbox"/> NORTH COUNTY DIVISION, 325 S. MELROSE DR., SUITE 1000, VISTA, CA 92081 <input type="checkbox"/> SOUTH COUNTY DIVISION, 500 3RD AVE., CHULA VISTA, CA 91910	JUDGE Hon. Joel R. Wohlfeil  DEPT C-73  CASE NUMBER 37-2019-00049151-CU-MC-CTL
PLAINTIFF(S) People of the State of California by and through Comm. of Business Oversight	
DEFENDANT(S) Silver Saddle Commercial Development, LP, et al.	
<b>AMENDMENT TO COMPLAINT</b>	

Under Code Civ. Proc. § 474:  
 FICTITIOUS NAME (Court order required once case is at issue)

Plaintiff(s), being ignorant of the true name of a defendant when the complaint in the above-named case was filed, and having designated defendant in the complaint by the fictitious name of

RELIEF DOE 1

and having discovered the true name of defendant to be

SS PURCHCO, LLC, a Delaware Limited Liability Company

amends the complaint by inserting such true name in place of such fictitious name wherever it appears in the complaint.

Date: FEBRUARY 5, 2020



Signature

Under Code Civ. Proc. § 473:  
 NAME - Add or Correct (Court order required)

Plaintiff(s), having designated  defendant  plaintiff in the complaint by the name of

and having discovered  name to be incorrect and the correct name is  defendant also uses the name of

amends the complaint by  substituting  adding such name(s) wherever the name of

appears in the complaint.

Date: \_\_\_\_\_

Signature

**ORDER**

The above amendment to the complaint is allowed.

Date: \_\_\_\_\_

Judge/Commissioner of the Superior Court

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>Robert R. Lux (CA Bar No. 189191)</b> 1350 Front Street, #2034 San Diego, CA 92101 (Robert.Lux@dbo.ca.gov) TELEPHONE NO.: 619-525-3729 FAX NO. (Optional): 619-525-4045 ATTORNEY FOR (Name): <b>People of the State of California</b>	<b>FOR COURT USE ONLY</b> <b>ELECTRONICALLY FILED</b> Superior Court of California, County of San Diego <b>02/05/2020</b> at 01:33:00 PM Clerk of the Superior Court By Lee McAlister, Deputy Clerk
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO</b> <input checked="" type="checkbox"/> CENTRAL DIVISION, HALL OF JUSTICE, 330 W. BROADWAY, SAN DIEGO, CA 92101 <input type="checkbox"/> EAST COUNTY DIVISION, 250 E. MAIN ST., EL CAJON, CA 92020 <input type="checkbox"/> NORTH COUNTY DIVISION, 325 S. MELROSE DR., SUITE 1000, VISTA, CA 92081 <input type="checkbox"/> SOUTH COUNTY DIVISION, 500 3RD AVE., CHULA VISTA, CA 91910	JUDGE Hon. Joel R. Wohlfeil DEPT C-73 CASE NUMBER 37-2019-00049151-CU-MC-CTL
PLAINTIFF(S) People of the State of California by and through Comm. of Business Oversight	
DEFENDANT(S) Silver Saddle Commercial Development, LP, et al.	
<b>AMENDMENT TO COMPLAINT</b>	

Under Code Civ. Proc. § 474:  
 FICTITIOUS NAME (Court order required once case is at issue)

Plaintiff(s), being ignorant of the true name of a defendant when the complaint in the above-named case was filed, and having designated defendant in the complaint by the fictitious name of  
RELIEF DOE 2  
 and having discovered the true name of defendant to be  
ROBERT V. KVASSAY  
 amends the complaint by inserting such true name in place of such fictitious name wherever it appears in the complaint.

Date: FEBRUARY 5, 2020 \_\_\_\_\_  
 \_\_\_\_\_  
 Signature

Under Code Civ. Proc. § 473:  
 NAME - Add or Correct (Court order required)

Plaintiff(s), having designated  defendant  plaintiff in the complaint by the name of \_\_\_\_\_  
 and having discovered  name to be incorrect and the correct name is  defendant also uses the name of \_\_\_\_\_  
 amends the complaint by  substituting  adding such name(s) wherever the name of \_\_\_\_\_  
 appears in the complaint.

Date: \_\_\_\_\_  
 \_\_\_\_\_  
 Signature

**ORDER**

The above amendment to the complaint is allowed.

Date: \_\_\_\_\_  
 \_\_\_\_\_  
 Judge/Commissioner of the Superior Court

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>Robert R. Lux (CA Bar No. 189191)</b> 1350 Front Street, #2034 San Diego, CA 92101 (Robert.Lux@dbo.ca.gov) TELEPHONE NO.: 619-525-3729 FAX NO. (Optional): 619-525-4045 ATTORNEY FOR (Name): People of the State of California	<b>FOR COURT USE ONLY</b>  <b>ELECTRONICALLY FILED</b> Superior Court of California, County of San Diego  <b>02/05/2020</b> at 01:33:00 PM Clerk of the Superior Court By Lee McAlister, Deputy Clerk
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO</b> <input checked="" type="checkbox"/> CENTRAL DIVISION, HALL OF JUSTICE, 330 W. BROADWAY, SAN DIEGO, CA 92101 <input type="checkbox"/> EAST COUNTY DIVISION, 250 E. MAIN ST., EL CAJON, CA 92020 <input type="checkbox"/> NORTH COUNTY DIVISION, 325 S. MELROSE DR., SUITE 1000, VISTA, CA 92081 <input type="checkbox"/> SOUTH COUNTY DIVISION, 500 3RD AVE., CHULA VISTA, CA 91910	JUDGE Hon. Joel R. Wohlfeil  DEPT C-73
PLAINTIFF(S) People of the State of California by and through Comm. of Business Oversight	CASE NUMBER 37-2019-00049151-CU-MC-CTL
DEFENDANT(S) Silver Saddle Commercial Development, LP, et al.	
<b>AMENDMENT TO COMPLAINT</b>	

Under Code Civ. Proc. § 474:  
 FICTITIOUS NAME (Court order required once case is at issue)

Plaintiff(s), being ignorant of the true name of a defendant when the complaint in the above-named case was filed, and having designated defendant in the complaint by the fictitious name of  
RELIEF DOE 3  
 and having discovered the true name of defendant to be  
RICHARD C. HUEBNER  
 amends the complaint by inserting such true name in place of such fictitious name wherever it appears in the complaint.

Date: FEBRUARY 5, 2020 \_\_\_\_\_  
 \_\_\_\_\_  
 Signature

Under Code Civ. Proc. § 473:  
 NAME - Add or Correct (Court order required)

Plaintiff(s), having designated  defendant  plaintiff in the complaint by the name of \_\_\_\_\_  
 and having discovered  name to be incorrect and the correct name is  defendant also uses the name of \_\_\_\_\_  
 amends the complaint by  substituting  adding such name(s) wherever the name of \_\_\_\_\_  
 appears in the complaint.

Date: \_\_\_\_\_  
 \_\_\_\_\_  
 Signature

**ORDER**

The above amendment to the complaint is allowed.

Date: \_\_\_\_\_  
 \_\_\_\_\_  
 Judge/Commissioner of the Superior Court

ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO: 189,191 NAME: Robert R. Lux FIRM NAME: Department of Business Oversight STREET ADDRESS: 1350 Front Street, Room 2034 CITY: San Diego STATE: CA ZIP CODE: 92101-3697 TELEPHONE NO.: (619) 525-3729 FAX NO.: (619) 525-4045 E-MAIL ADDRESS: robert.lux@dbo.ca.gov ATTORNEY FOR (name): The People of the State of California	<b>FOR COURT USE ONLY</b>
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Diego</b> STREET ADDRESS: 330 West Broadway MAILING ADDRESS: CITY AND ZIP CODE: San Diego, CA 92101 BRANCH NAME: Hall of Justice	CASE NUMBER: 37-2019-00049151-CU-MC-CTL
Plaintiff/Petitioner: The People of the State of California, et al. Defendant/Respondent: Silver Saddle Commercial Development, L.P., et al.	JUDICIAL OFFICER: Hon. Joel Wohlfeil
<p style="text-align: center;"><b>PROOF OF SERVICE—CIVIL</b></p> Check method of service (only one): <input type="checkbox"/> By Personal Service <input checked="" type="checkbox"/> By Mail <input type="checkbox"/> By Overnight Delivery <input type="checkbox"/> By Messenger Service <input type="checkbox"/> By Fax	DEPARTMENT: C-73

**Do not use this form to show service of a summons and complaint or for electronic service.  
See USE OF THIS FORM on page 3.**

1. At the time of service I was over 18 years of age and not a party to this action.
2. My residence or business address is:  
Department of Business Oversight, 1515 K Street, Suite 200, Sacramento, California 95814
3.  The fax number from which I served the documents is (complete if service was by fax):
4. On (date): February 7, 2020 I served the following documents (specify):  
 1) Amendment to Complaint adding Relief Doe 1, SS Purchco, LLC; 2) Amendment to Complaint adding Relief Doe 2, Robert V. Kvassay; and 3) Amendment to Complaint adding Relief Doe 3, Richard C. Huebner  
  
 The documents are listed in the Attachment to Proof of Service—Civil (Documents Served) (form POS-040(D)).
5. I served the documents on the person or persons below, as follows:
  - a. Name of person served:
  - b.  (Complete if service was by personal service, mail, overnight delivery, or messenger service.)  
Business or residential address where person was served:
  - c.  (Complete if service was by fax.)  
Fax number where person was served: The names, addresses, and other applicable information about persons served is on the Attachment to Proof of Service—Civil (Persons Served) (form POS-040(P)).
6. The documents were served by the following means (specify):
  - a.  **By personal service.** I personally delivered the documents to the persons at the addresses listed in item 5. (1) For a party represented by an attorney, delivery was made (a) to the attorney personally; or (b) by leaving the documents at the attorney's office, in an envelope or package clearly labeled to identify the attorney being served, with a receptionist or an individual in charge of the office; or (c) if there was no person in the office with whom the notice or papers could be left, by leaving them in a conspicuous place in the office between the hours of nine in the morning and five in the evening. (2) For a party, delivery was made to the party or by leaving the documents at the party's residence with some person not younger than 18 years of age between the hours of eight in the morning and eight in the evening.

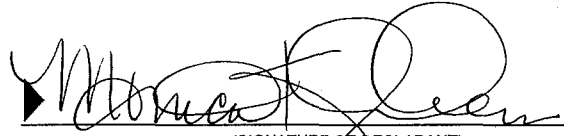
CASE NAME: People of the State of California v. Silver Saddle Commercial Development, L.P., et al.	CASE NUMBER: 37-2019-00049151-CU-MC-CTL
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6. b.  **By United States mail.** I enclosed the documents in a sealed envelope or package addressed to the persons at the addresses in item 5 and *(specify one)*:
- (1)  deposited the sealed envelope with the United States Postal Service, with the postage fully prepaid.
  - (2)  placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.
- I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at *(city and state)*:
- c.  **By overnight delivery.** I enclosed the documents in an envelope or package provided by an overnight delivery carrier and addressed to the persons at the addresses in item 5. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of the overnight delivery carrier.
  - d.  **By messenger service.** I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed in item 5 and providing them to a professional messenger service for service. *(A declaration by the messenger must accompany this Proof of Service or be contained in the Declaration of Messenger below.)*
  - e.  **By fax transmission.** Based on an agreement of the parties to accept service by fax transmission, I faxed the documents to the persons at the fax numbers listed in item 5. No error was reported by the fax machine that I used. A copy of the record of the fax transmission, which I printed out, is attached.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: February 7, 2020

Monica K. Ahrens  
(TYPE OR PRINT NAME OF DECLARANT)



(SIGNATURE OF DECLARANT)

*(If item 6d above is checked, the declaration below must be completed or a separate declaration from a messenger must be attached.)*

**DECLARATION OF MESSENGER**

- By personal service.** I personally delivered the envelope or package received from the declarant above to the persons at the addresses listed in item 5. (1) For a party represented by an attorney, delivery was made (a) to the attorney personally; or (b) by leaving the documents at the attorney's office, in an envelope or package clearly labeled to identify the attorney being served, with a receptionist or an individual in charge of the office; or (c) if there was no person in the office with whom the notice or papers could be left, by leaving them in a conspicuous place in the office between the hours of nine in the morning and five in the evening. (2) For a party, delivery was made to the party or by leaving the documents at the party's residence with some person not younger than 18 years of age between the hours of eight in the morning and six in the evening.

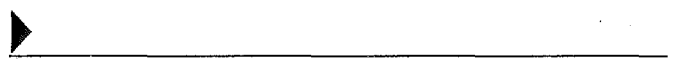
At the time of service, I was over 18 years of age. I am not a party to the above-referenced legal proceeding.

I served the envelope or package, as stated above, on *(date)*:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

\_\_\_\_\_  
(NAME OF DECLARANT)



\_\_\_\_\_  
(SIGNATURE OF DECLARANT)

SHORT TITLE: People v. Silver Saddle Commercial Development, L.P., et al.	CASE NUMBER: 37-2019-00049151-CU-MC-CTL
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**ATTACHMENT TO PROOF OF SERVICE—CIVIL (PERSONS SERVED)**

*(This attachment is for use with form POS-040.)*

**NAMES, ADDRESSES, AND OTHER APPLICABLE INFORMATION ABOUT PERSONS SERVED:**

**Name of Person Served**

**Where Served**

*(If the person served is an attorney, the party or parties represented should also be stated.)*

*(Provide business or residential address where service was made by personal service, mail, overnight delivery, or messenger service. For service by fax, provide fax number.)*

Thomas Maney

Mark Hiraide, Mitchell Silberberg & Knupp LLP, 2049 Century Park East, 18th Fl., Los Angeles, CA 90067

Silver Saddle Commercial Development, L.P

Mark Hiraide, Mitchell Silberberg & Knupp LLP, 2049 Century Park East, 18th Fl., Los Angeles, CA 90067

Silver Saddle Ranch & Club, Inc.

Mark Hiraide, Mitchell Silberberg & Knupp LLP, 2049 Century Park East, 18th Fl., Los Angeles, CA 90067

Galileo Commercial Property Owners Association, Inc.

3430 East Flamingo Road, Suite 251, Las Vegas, NV 89121

Marian G. Ducreux

Orlando F. Cabanday, Cabanday Law Group, 21211 South Western Ave., Ste. 208, Torrance, CA 90501

Clifford J. Reynolds

2525 North 20th Avenue, Pasco, WA 99301

Wayne A. Pedersen

Joseph Mellano, Shustak Reynolds & Partners, PC, 401 West A St, Ste 2200, San Diego, CA 92101

Kelly A. Maney

Joseph Pertel, Law Office of Joseph A. Pertel, 1717 Fourth St, Ste 300, Santa Monica, CA 90401

Thomas McNamara

McNamara Smith LLP, 655 W. Broadway, Suite 1600, San Diego, CA 92101