



CASE NO: A-22-858925-C
Department 21

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**DISTRICT COURT
CLARK COUNTY, NEVADA**

VICTORIA SEAMAN, an individual;

Plaintiff,

CASE NO.:
DEPT NO.:

vs.

MICHELE FIORE, an individual; CITY OF
LAS VEGAS, a political subdivision of the
State of Nevada; DOES 2 through 10,
inclusive; ROE CORPORATIONS 11
through 20, inclusive; and ABC LIMITED
LIABILITY COMPANIES 21 through 30,
inclusive,

COMPLAINT

Defendants.

Plaintiff, VICTORIA SEAMAN (“Plaintiff” or “Councilwoman Seaman”), by and through her attorneys, Brian D. Nettles, Esq., Christian M. Morris, Esq., and Kimberly A. Nelson, Esq., of the law firm NETTLES | MORRIS, and for her causes of action against Defendant MICHELE FIORE (“Councilwoman Fiore) and Defendant CITY OF LAS VEGAS (the “City”) (together “Defendants”) hereby complains and alleges as follows:

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STATEMENT OF JURISDICTION AND VENUE

1. The Eighth Judicial District Court has jurisdiction over this action pursuant to Art. VI Sec. 6 of the Nevada Constitution, NRCP 8(a)(4), NRS 13.040, and NRS 41.130 as the occurrence giving rise to this case took place in Clark County, Nevada and the amount in controversy exceeds \$15,000.

2. Jurisdiction by this Court is proper over Defendant, Councilwoman Fiore, in this action because her tortious conduct, including but not limited to, assault, battery, and infliction of emotional distress, took place in Clark County, Nevada.

3. Further, jurisdiction by this Court is proper because Plaintiff, Councilwoman Seaman, suffered injuries, emotional distress, and damages in Clark County, Nevada, due to the actions of Councilwoman Fiore and the City of Las Vegas.

4. Additionally, Councilwoman Fiore and Councilwoman Seaman both currently reside in Clark County, Nevada.

PARTIES

5. Plaintiff VICTORIA SEAMAN is, and at all relevant times was, an individual residing in Clark County, Nevada.

6. Upon information and belief, Defendant MICHELE FIORE is, and at all relevant times was, an individual residing in Clark County, Nevada.

7. Upon information and belief, Defendant CITY OF LAS VEGAS is, and at all relevant times was, a political subdivision of the State of Nevada and was doing business in Nevada where the subject unlawful acts occurred.

8. The true names and capacities, whether individual, corporate, associate, governmental or otherwise, of defendants DOES 2 through 10, ROE CORPORATIONS 11 through 20; and ABC LIMITED LIABILITY COMPANIES 21 through 30 (“Does/Roe/ABC”), are unknown to Plaintiff at this time, who therefore sues said defendants by such fictitious names. When the true names and capacities of said defendants have been ascertained, Plaintiff will amend this Complaint accordingly.

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1 33. Councilwoman Fiore grabbed Councilwoman Seaman by the hair and violently
2 yanked her head backwards throwing her to the floor, where Councilwoman Seaman was left
3 alone.

4 34. Councilwoman Fiore did not stop to see if Councilwoman Seaman had suffered
5 any serious injuries due to the attack, but rather she fled the scene of the attack and immediately
6 went to Mayor Goodman’s office.

7 35. Councilwoman Seaman was extremely physically and emotionally distraught after
8 the attack. She was shaking, in pain, and in a state of shock. Despite the pain and being in a state
9 of confusion and disbelief, Councilwoman Seaman managed to get up and seek help.

10 36. Councilwoman Seaman went to Mayor Goodman’s office to inform her that she
11 had been attacked by Councilwoman Fiore, a fellow colleague and member of the City Council.

12 37. When Councilwoman Seaman arrived at Mayor Goodman’s Office,
13 Councilwoman Fiore slammed the door to the Mayor Goodman’s office in her face.

14 38. Colleagues and other City Council members witnessed Councilwoman Fiore slam
15 the door in Councilwoman Seaman’s face.

16 39. Councilwoman Fiore claimed that she had been attacked by Councilwoman
17 Seaman. But Councilwoman Seaman insisted this was a lie, and she told Mayor Goodman to get
18 the video surveillance footage of the attack to see firsthand that Councilwoman Fiore was lying.

19 40. Councilwoman Seaman explained to Mayor Goodman that she was violently
20 attacked by Councilwoman Fiore and that the truth would be clear after viewing the video
21 surveillance footage.

22 41. Mayor Goodman stated she was not aware of the presence of any cameras in the
23 hallway where the attack occurred.

24 42. Mayor Goodman stated both parties were up for reelection and should work in
25 good faith to resolve all issues.

26 43. Councilwoman Seaman demanded that Councilwoman Fiore acknowledge and
27 admit to Mayor Goodman that the attack had occurred. Councilwoman Seaman declared that she
28 would press criminal charges if Councilwoman Fiore did not take responsibility for her actions.

1 54. Councilwoman Seaman informed her campaign team that the work environment
2 and situation at City Hall had deteriorated to the point that she felt overwhelmed. The problem
3 was amplified because she was experiencing severe anxiety and mental exhaustion due to the
4 attack and continued abuse by Councilwoman Fiore.

5 55. Due to the hostile work environment, Councilwoman Seaman approached Mayor
6 Goodman, a City Manager, and a city attorney to ask about any decorum rules or polices regarding
7 physical assault and bullying at the City Council. They were unresponsive and unsympathetic to
8 her concerns and requests.

9 56. Councilwoman Seaman continued to experience significant stress, fear, and
10 anxiety while at work following the attack. She also had significant pain in her finger. Her stress,
11 fear, and anxiety were exacerbated by continued hostile, aggressive, and inappropriate verbal
12 attacks from Councilwoman Fiore. Accordingly, Councilwoman Seaman sought the help and
13 assistance of Mayor Goodman and a city attorney.

14 57. Mayor Goodman explained that Councilwoman Fiore could not be fired because
15 she was an elected official and not an employee. Additionally, Mayor Goodman suggested that if
16 Councilwoman Seaman was experiencing so much distress she might consider resigning.

17 58. Councilwoman Seaman requested that Councilwoman Fiore be removed from the
18 Audit Committee, but Mayor Goodman suggested an alternate solution in which Councilwoman
19 Seaman would step down from the committee.

20 59. As a result, Councilwoman Seaman spent months suffering physical pain,
21 humiliation, embarrassment, and trauma due to the attack and because the City Council refused
22 to properly address or rectify the verbal, physical, emotional, and mental abuse by Councilwoman
23 Fiore.

24 60. As a result, Councilwoman Seaman seeks enforcement of safety and security
25 policy changes at Las Vegas City Hall. Additionally, Councilwoman Seaman seeks resignation
26 of Councilwoman Fiore.

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1 **FIRST CAUSE OF ACTION**

2 **(Battery)**

3 61. Plaintiff repeats and realleges the allegations contained in the preceding paragraphs
4 as though fully set forth herein.

5 62. Councilwoman Fiore intentionally, spitefully, and maliciously initiated a violent
6 and harmful contact, which invaded the bodily autonomy of Councilwoman Seaman, by violently
7 grabbing Councilwoman Seaman's hand and violently twisting, pulling, and breaking her finger.

8 63. Councilwoman Fiore knew or should have known that such a harmful invasion of
9 Councilwoman Seaman's person was likely to lead to significant injury, and in fact, serious
10 injuries occurred, including but not limited to broken bones.

11 64. Councilwoman Fiore grabbed Councilwoman Seaman's hand with the specific
12 intent to inflict pain, establish control, dominate, humiliate, embarrass, and injure, as evidenced
13 by the violent way she twisted, jerked, and squeezed Councilwoman Seaman's hand and tried to
14 throw her to the floor.

15 65. Considering the significant hostilities, harassments, threats, and abuse from
16 Councilwoman Fiore directed towards Councilwoman Seaman, there was no reason for her to
17 expect the victim consented to the violent touching which caused significant injuries to
18 Councilwoman Seaman's hand, including but not limited to broken bones.

19 66. Councilwoman Fiore intentionally, spitefully, and maliciously initiated a violent
20 and harmful physical contact, which invaded the bodily autonomy of Councilwoman Seaman, by
21 violently grabbing Councilwoman Seaman by the hair and violently jerking her head backwards
22 and throwing her on the floor.

23 67. Councilwoman Fiore knew or should have known that such a harmful invasion of
24 Councilwoman Seaman's person was likely to lead to serious injuries including but not limited to
25 concussion, contusions, lacerations, and a myriad of other possible injuries.

26 68. Councilwoman Fiore grabbed Councilwoman Seaman violently by the hair with
27 the specific intention to inflict pain, establish control, dominate, humiliate, embarrass, and injure,
28 as evidenced by the way she threw Councilwoman Seaman to the floor and left her there without

1 any care or concern for her condition or possible injuries.

2 69. Considering the significant hostilities, harassments, threats, and abuse from
3 Councilwoman Fiore directed towards Councilwoman Seaman, there was no reason for her to
4 expect the victim consented to the violent physical contact which caused significant injuries to
5 Councilwoman Seaman.

6 70. Councilwoman Seaman suffered bodily pain, humiliation, mental anguish, and
7 other injuries that occurred as a necessary and natural consequence of the tortious conduct of
8 Councilwoman Fiore.

9 71. As a direct and proximate result of the intentional, violent, willful, malicious, and
10 spiteful attack by Councilwoman Fiore, Councilwoman Seaman suffered physical injuries and
11 bodily pain, humiliation, emotional anxiety, mental anguish, embarrassment, and other injuries.

12 72. Councilwoman Seaman has suffered permanent and severe medical injuries
13 including broken bones, loss of mobility in her hand, severe pain and suffering, and loss of normal
14 life, to the extent that her damages are in a sum exceeding \$15,000.

15 73. As a direct and proximate result of the intentional, violent, willful, malicious, and
16 spiteful attack by Councilwoman Fiore, Councilwoman Seaman received medical and other
17 treatments for injuries sustained to her hand, all or some of which conditions may be permanent
18 and disabling and, all to her damage in a sum exceeding \$15,000. Additionally, said services,
19 care, and treatment are continuing and may continue in the future.

20 74. As a direct and proximate result of the intentional, violent, willful, malicious, and
21 spiteful attack by Councilwoman Fiore, Councilwoman Seaman has been limited in certain
22 recreational activities, which have caused, and shall continue to cause loss of enjoyment of life
23 all to her damage in an amount exceeding \$15,000. Specifically, as a direct and proximate result
24 of acts as alleged herein, Councilwoman Seaman has had to take extra safety precautions to
25 continue on her role and duties as a City Councilwoman to serve and support the people of Las
26 Vegas.

27 75. Councilwoman Fiore acted with malice, express or implied, oppression and/or
28 conscious disregard of the safety of Councilwoman Seaman, to embarrass, humiliate, dominate,

1 injure, and subjugate Councilwoman Seaman. As a direct and proximate result of Councilwoman
2 Fiore’s conduct, Councilwoman Seaman is entitled to an award of punitive damages based on the
3 factors and circumstances surrounding the attack.

4 76. As a direct and proximate result of Councilwoman Fiore’s extreme and outrageous
5 conduct, which is especially extreme and outrageous considering her role and relationship to
6 Councilwoman Seaman as a fellow City Council member, Councilwoman Seaman suffered
7 physical injuries and bodily pain, humiliation, emotional anxiety, mental anguish, embarrassment,
8 and other injuries, including extra safety precautions fulfilling her role and duties as a City
9 Councilwoman for the people of Las Vegas, all to her damage in a sum exceeding \$15,000.

10 77. As a direct and proximate result of the acts of Defendants, and each of them, as
11 alleged herein, Plaintiff has had to retain the services of the law firm of NETTLES | MORRIS to
12 pursue this action and is entitled to recover costs of suit and reasonable attorney’s fees incurred
13 therein.

14 **SECOND CAUSE OF ACTION**

15 **(Assault)**

16 78. Plaintiff repeats and realleges the allegations contained in the preceding paragraphs
17 as though fully set forth herein.

18 79. Councilwoman Fiore intentionally, spitefully, and maliciously threatened
19 Councilwoman Seaman and caused her to be apprehensive that an act of physical violence was
20 imminent.

21 80. Considering the numerous threats and escalating abuse towards Councilwoman
22 Seaman, Councilwoman Fiore knew or should have known that Councilwoman Seaman would
23 be fearful that an imminent act of physical violence would occur.

24 81. Councilwoman Seaman’s fears were justified and understandable based on the
25 animosity, abuse, hostility, and unpredictable conduct of Councilwoman Fiore.

26 82. Indeed, as Councilwoman Fiore approached Councilwoman Seaman from behind
27 and attempted to grab her hand, Councilwoman Seaman experienced an imminent fear that she
28 was going to be attacked.

1 83. Councilwoman Seaman’s fear that she might be attacked was reasonable
2 considering that Councilwoman Fiore has a history of making very public statements which
3 condone, glorify, and support the use of physical violence against others.

4 84. Additionally, Councilwoman Seaman’s fears that she might be imminently
5 attacked were reasonable because Councilwoman Fiore had the ability to cause physical harm, no
6 one was present to prevent or stop an attack, and Councilwoman Fiore had no valid reason to be
7 in such unreasonable and unnecessary proximity to Councilwoman Seaman.

8 85. Furthermore, after the initial act of physical violence, Councilwoman Seaman
9 again experienced a reasonable fear that she would be further harmed, and that another act of
10 physical violence was imminent.

11 86. After Councilwoman Seaman suffered a broken finger and managed to free her
12 hand from the grip of Councilwoman Fiore, she reasonably expected that the incident was over,
13 and she would suffer no further harm.

14 87. However, Councilwoman Fiore again tried to grab Councilwoman Seaman, and
15 so she again experienced a reasonable fear that she would be harmed, and that physical violence
16 was imminent.

17 88. As a direct and proximate cause of the assault, Councilwoman Seaman has been
18 unable to be alone at work due to fear and anxiety that she might suffer another violent attack.

19 89. As a direct and proximate cause of the assault, Councilwoman Seaman suffered
20 extreme and severe emotional anxiety, panic attacks, emotional distress, paranoia, emotional and
21 mental fatigue, and depression.

22 90. As a direct and proximate cause of the assault, Councilwoman Seaman had to take
23 extra security precautions while fulfilling her obligations and duties as a City Councilwoman.

24 91. As a direct and proximate cause of the assault, Councilwoman Seaman suffered
25 feelings of paranoia and anxiety because she feared that she might again be attacked at any time
26 by Councilwoman Fiore. This is especially problematic because both parties are required to
27 interact and work together at the City Council.

28 92. As a direct and proximate cause of the assault, Councilwoman Seaman suffered

1 symptoms consistent with post-traumatic stress disorder, and in the future may need care and
2 treatment to help her effectively cope with the emotional trauma she suffered due to the assault
3 by Councilwoman Fiore.

4 93. Councilwoman Fiore’s assault of Councilwoman Seaman was wrongful and
5 accompanied by insult. Furthermore, it was committed with forethought and malice including but
6 not limited to the intention to intimidate, humiliate, dominate, subjugate, and embarrass a fellow
7 member of the City Council. Therefore, Councilwoman Seaman is entitled to punitive damages.

8 94. As a direct and proximate result of the acts of Defendants, and each of them, as
9 alleged herein, Plaintiff has had to retain the services of the law firm of NETTLES | MORRIS to
10 pursue this action and is entitled to recover costs of suit and reasonable attorney’s fees incurred
11 therein.

12 **THIRD CAUSE OF ACTION**
13 **(Intentional Infliction of Emotional Distress)**

14 95. Plaintiff repeats and realleges the allegations contained in the preceding paragraphs
15 as though fully set forth herein.

16 96. Councilwoman Fiore engaged in extreme and outrageous conduct which was
17 shockingly outside any limits of decency, and her conduct is completely unexpected and entirely
18 intolerable in a civilized society.

19 97. Councilwoman Fiore’s violent attack of Councilwoman Seaman is extreme,
20 outrageous, and shocking because both parties are City Councilwomen and expected to maintain
21 the highest standards of decency and model appropriate civic behavior. It is shocking, outrageous,
22 and extreme that a person who is expected to be a role model in the community would resort to
23 an act of violence against a fellow City Council member, no matter what differences they might
24 have.

25 98. Councilwoman Fiore’s violent attack of Councilwoman Seaman is extreme,
26 outrageous, and shocking because her actions are intolerable in a civilized society. Indeed, the
27 use of force and physical violence is entirely unacceptable and repulsive in democratic societies
28 where people work together to resolve their differences in a civilized way.

1 99. Councilwoman Fiore’s violent attack of Councilwoman Seaman is extreme,
2 outrageous, and shocking because she intentionally used violence to embarrass, humiliate,
3 dominate, injure, and subjugate Councilwoman Seaman. This is especially shocking considering
4 that City Council members are expected to act with courtesy, professionalism, eloquence, and
5 civility.

6 100. As a direct and proximate result of Councilwoman Fiore’s extreme, outrageous,
7 and shocking actions, Councilwoman Seaman suffered physical injuries and bodily pain,
8 humiliation, emotional anxiety, mental anguish, embarrassment, and other injuries.

9 101. As a direct and proximate result of Councilwoman Fiore’s extreme, outrageous,
10 and shocking actions, Councilwoman Seaman has been unable to be alone at work due to extreme
11 fear and anxiety that she might suffer another violent attack.

12 102. As a direct and proximate result of Councilwoman Fiore’s extreme, outrageous,
13 and shocking actions, Councilwoman Seaman suffered extreme and severe emotional anxiety,
14 panic attacks, emotional distress, paranoia, emotional and mental fatigue, and depression.

15 103. As a direct and proximate result of Councilwoman Fiore’s extreme, outrageous,
16 and shocking actions, Councilwoman Seaman suffered extreme feelings of paranoia and anxiety
17 because she feared that she might again be attacked at any time by Councilwoman Fiore. This is
18 especially problematic because both parties are required to interact and work together at the City
19 Council.

20 104. As a direct and proximate result of Councilwoman Fiore’s extreme, outrageous,
21 and shocking actions, Councilwoman Seaman suffered symptoms consistent with post-traumatic
22 stress disorder, and in the future may need professional care and treatment to help her effectively
23 cope with the emotional trauma she suffered due to the violent attack by Councilwoman Fiore.

24 105. As a direct and proximate result of the acts of Defendants, and each of them, as
25 alleged herein, Plaintiff has had to retain the services of the law firm of NETTLES | MORRIS to
26 pursue this action and is entitled to recover costs of suit and reasonable attorney’s fees incurred
27 therein.

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FOURTH CAUSE OF ACTION

(Negligent Infliction of Emotional Distress)

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

107. Councilwoman Fiore and/or the City negligently caused injuries to Councilwoman Seaman by failing to properly mediate, reconcile, and/or alleviate the growing animosity, hostility, and abuse taking place at the City Council.

108. The City knew or should have known that Councilwoman Fiore was becoming increasingly abusive, aggressive, hostile, unpredictable, spiteful, and malicious.

109. The City knew or should have known that absent intervention—or at a minimum a warning or reprimand to Councilwoman Fiore—there was a serious and appreciable risk that an act of violence might occur.

110. The City negligently disregarded numerous attempts and requests by Councilwoman Seaman to intervene in the matter and provide relief.

111. The City negligently disregarded numerous attempts and requests by Councilwoman Seaman to distance herself from Councilwoman Fiore.

112. The City negligently placed Councilwoman Fiore on the Audit Committee when the City knew or should have known that this would increase the risk that a violent altercation might occur between Councilwoman Fiore and Councilwoman Seaman.

113. Councilwoman Fiore acted negligently when she threatened, harassed, demeaned, and intimidated Councilwoman Seaman.

114. Councilwoman negligently committed an assault and battery against Councilwoman Seaman and knew or should have known such actions would cause severe mental and physical injuries.

115. But for the actions of the City, Council Woman Fiore would not have been on the Audit Committee and the violent attack on January 11, 2021 would not have occurred.

116. The City knew or should have known that Councilwoman Fiore was becoming increasingly erratic and unpredictable in her actions, because Councilwoman Seaman informed

1 the City of her concerns that Councilwoman Fiore was becoming unpredictable and increasingly
2 abusive.

3 117. As a direct and proximate result of the negligence of the City and Councilwoman
4 Fiore, Councilwoman Seaman suffered physical injuries and bodily pain, humiliation, emotional
5 anxiety, mental anguish, embarrassment, and other injuries.

6 118. As a direct and proximate result of the negligence of the City and Councilwoman
7 Fiore, Councilwoman Seaman has suffered permanent and severe medical injuries including
8 broken bones, loss of mobility in her hand, severe pain and suffering, and loss of normal life, to
9 the extent that her damages are in a sum exceeding \$15,000.

10 119. As a direct and proximate result of the negligence of the City and Councilwoman
11 Fiore, Councilwoman Seaman received medical and other treatments for injuries sustained to her
12 hand, all or some of which conditions may be permanent and disabling and, all to her damage in
13 a sum exceeding \$15,000. Additionally, said services, care, and treatment are continuing and may
14 continue in the future.

15 120. Councilwoman Fiore acted with malice, express or implied, oppression and/or
16 conscious disregard of the safety of Councilwoman Seaman, to embarrass, humiliate, dominate,
17 injure, and subjugate Councilwoman Seaman. As a direct and proximate result of the
18 Councilwoman Fiore's conduct, Councilwoman Seaman is entitled to an award of punitive
19 damages.

20 121. As a direct and proximate result of the acts of Defendants, and each of them, as
21 alleged herein, Plaintiff has had to retain the services of the law firm of NETTLES | MORRIS to
22 pursue this action and is entitled to recover costs of suit and reasonable attorney's fees incurred
23 therein.

24 **FIFTH CAUSE OF ACTION**

25 **(Civil Conspiracy)**

26 122. Plaintiff repeats and realleges the allegations contained in the preceding paragraphs
27 as though fully set forth herein.

28 123. The City by and through its employees, agents, elected officials, and/or contractors

1 acted in concert to conceal, suppress, and impede the investigation of the illegal assault and
2 battery of Councilwoman Seaman at the hands of Councilwoman Fiore.

3 124. The City by and through its employees, agents, elected officials, and/or contractors
4 acted in concert to pressure, coerce, and manipulate Councilwoman Seaman to ensure that no
5 investigation or prosecution of Councilwoman Fiore took place.

6 125. The City by and through its employees, agents, elected officials, and/or contractors
7 acted in concert to stall, frustrate, impede, and limit Councilwoman Seaman's attempts to hold
8 Councilwoman Fiore accountable for her illegal actions.

9 126. The City by and through its employees, agents, elected officials, and/or contractors
10 acted in concert to take such actions to minimize that risk that the assault and battery would be
11 made public and reflect poorly on the City Council and both Councilwomen.

12 127. The City by and through its employees, agents, elected officials, and/or contractors
13 acted in concert to destroy, conceal, suppress, and hide evidence of the illegal assault and battery
14 of Councilwoman Seaman at the hands of Councilwoman Fiore.

15 128. The City by and through its employees, agents, elected officials, and/or contractors
16 acted in concert to destroy, conceal, suppress, and hide evidence of the illegal assault and battery
17 to prevent it from being available to members of the press who had lawfully requested access to
18 the video surveillance footage.

19 129. The City by and through its employees, agents, elected officials, and/or contractors
20 acted in concert to destroy video evidence of a crime that occurred on the premises of the City
21 Council building after a City Council Meeting between two members of the City Council.

22 130. The City by and through its employees, agents, elected officials, and/or contractors
23 acted in concert to destroy video evidence of a crime when they knew or should have known that
24 such evidence was important and should be preserved and maintained because it might be
25 necessary for future criminal or civil legal proceedings.

26 131. The City by and through its employees, agents, elected officials, and/or contractors
27 acted in concert to pressure, coerce, and manipulate Councilwoman Seaman to ensure she was
28 complicit with the destruction of video evidence of the assault and battery she suffered at the

1 hands of Councilwoman Fiore.

2 132. The City by and through its employees, agents, elected officials, and/or contractors
3 committed the illegal act of destroying evidence of a crime to deprive Councilwoman Seaman of
4 her legal rights to hold Councilwoman Fiore accountable for the assault and battery she
5 committed.

6 133. The City by and through its employees, agents, elected officials, and/or contractors
7 committed the illegal act of destroying evidence of a crime to deprive the public of the knowledge
8 of events which might embarrass, discredit, or reflect poorly on the Las Vegas City Council.

9 134. As a direct and proximate result of the conspiracy of the City by and through its
10 employees, agents, elected officials, and/or contractors, Councilwoman Seaman has been
11 deprived of key evidence needed to hold Councilwoman Fiore accountable for assault and battery.

12 135. As a direct and proximate result of the conspiracy of the City by and through its
13 employees, agents, elected officials, and/or contractors, Councilwoman Seaman was pressured,
14 coerced, and forced to consider resigning from her employment.

15 136. As a direct and proximate result of the conspiracy of the City by and through its
16 employees, agents, elected officials, and/or contractors, Councilwoman Seaman suffered
17 humiliation, emotional anxiety, mental anguish, embarrassment, and other injuries, all to her
18 damage in a sum exceeding \$15,000.

19 137. As a direct and proximate result of the acts of Defendants, and each of them, as
20 alleged herein, Plaintiff has had to retain the services of the law firm of NETTLES | MORRIS to
21 pursue this action and is entitled to recover costs of suit and reasonable attorney's fees incurred
22 therein.

23 **SIXTH CAUSE OF ACTION**

24 **(Negligent Security)**

25 138. Plaintiff repeats and realleges the allegations contained in the preceding paragraphs
26 as though fully set forth herein.

27 139. The City by and through its employees, agents, elected officials, and/or contractors
28 had a duty to look out for the care, protection, and security of all people at the City Council.

1 140. The City by and through its employees, agents, elected officials, and/or contractors
2 had a duty to protect against any risk of harm to employees based on the totality of circumstances
3 and known facts.

4 141. The City by and through its employees, agents, elected officials, and/or contractors
5 had a duty to enforce policies and procedures for the regulation, management, safety, protection,
6 and control of all people at City Council, including Councilwoman Seaman.

7 142. The City by and through its employees, agents, elected officials, and/or contractors
8 negligently failed to provide adequate support, security, enforcement, and precautions to prevent
9 Councilwoman Seaman from being attacked by Councilwoman Fiore.

10 143. The City by and through its employees, agents, elected officials, and/or contractors
11 knew or should have known that Councilwoman Fiore created a serious risk that a violent incident
12 might occur. The City was aware the Councilwoman Fiore was becoming increasingly aggressive,
13 hostile, abusive, erratic, and unpredictable.

14 144. The City knew or should have known that Councilwoman Fiore supports,
15 encourages, and threatens use of physical violence based on numerous public statements she has
16 made which condone, encourage and glorify violence against individuals.

17 145. Accordingly, the City should have appreciated the significance of Councilwoman
18 Seaman’s fears and requests to be distanced from Councilwoman Fiore.

19 146. The City had numerous opportunities to take action to mitigate, limit, or alleviate
20 the abuse, hostility, and harassment that Councilwoman Seaman suffered at the hands of
21 Councilwoman Fiore.

22 147. Furthermore, the City negligently placed Councilwoman Fiore on a committee
23 chaired by Councilwoman Seaman, despite prior statements that Councilwoman Seaman feared
24 for her safety because she was harassed, abused, and demeaned by Councilwoman Fiore.

25 148. The City was negligent in failing to appreciate the risk that a violent act by
26 Councilwoman Fiore might occur, and in failing to provide adequate security during meetings
27 and at the City Council building.

28 149. The City was also negligent in failing to address the improper, unprofessional, and

1 wrongful conduct of Councilwoman Fiore prior to the violent incident.

2 150. The City failed to implement and enforce proper workplace and safety standards,
3 protocols, or controls to ensure that members of the City Council would be safe and secure while
4 working on behalf of the City Council.

5 151. The City knew or should have known that an act of physical violence would occur
6 if it failed to enforce proper workplace standards, protocols, or controls to ensure that members
7 of the City Council would be safe and secure while working on behalf of the City Council.

8 152. The City failed to warn, reprimand, discipline, or caution Councilwoman Fiore
9 when the City clearly was in a position to take such disciplinary actions.

10 153. As a direct and proximate result of the negligence of the City, Councilwoman
11 Seaman suffered physical injuries and bodily pain, humiliation, emotional anxiety, mental
12 anguish, embarrassment, and other injuries.

13 154. As a direct and proximate result of the negligence of the City, Councilwoman
14 Seaman has suffered permanent and severe medical injuries including broken bones, loss of
15 mobility in her hand, severe pain and suffering, and loss of normal life, to the extent that her
16 damages are in a sum exceeding \$15,000.

17 155. As a direct and proximate result of the negligence of the City, Councilwoman
18 Seaman received medical and other treatments for injuries sustained to her hand, all or some of
19 which conditions may be permanent and disabling and, all to her damage in a sum exceeding
20 \$15,000. Additionally, said services, care, and treatment are continuing and may continue in the
21 future.

22 156. As a direct and proximate result of the negligence of the City, Councilwoman
23 Seaman has been limited in certain recreational activities, which have caused, and shall continue
24 to cause, loss of enjoyment of life all to her damage in an amount exceeding \$15,000.

25 157. As a direct and proximate result of the acts of Defendants, and each of them, as
26 alleged herein, Plaintiff has had to retain the services of the law firm of NETTLES | MORRIS to
27 pursue this action and is entitled to recover costs of suit and reasonable attorney's fees incurred
28 therein.

SEVENTH CAUSE OF ACTION

(Negligent Hiring Training and Supervision)

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

5 159. The City had a non-delegable duty to exercise due care in the hiring, training,
6 supervision, and retention of its employees, agents, contractors, including but not limited to City
7 Council members.

8 160. The City breached this non-delegable duty to exercise due care in the hiring,
9 training, supervision, and retention of its employees, agents, contractors, including but not limited
10 to City Council members.

11 161. The City had a duty to supervise, discipline, restrain, train, punish, and/or
12 intervene to stop individuals who violated the rules, professional standards of decorum, or the
13 law.

14 162. The City was aware of numerous inappropriate and illegal actions by
15 Councilwoman Fiore including but not limited to harassment, verbal abuse, threats, battery,
16 assault, and intimidation.

17 163. The City failed to properly supervise, discipline, restrain, train, punish, and/or
18 intervene to stop Councilwoman Fiore, even after she committed an illegal assault and battery
19 against Councilwoman Seaman.

20 164. The City had a duty to supervise, discipline, restrain, train, punish, and/or
21 intervene to stop individuals who violated the rules, professional standards of decorum, or law,
22 including the custodians of video evidence of the assault and battery committed by
23 Councilwoman Fiore.

24 165. The City was aware of the video evidence of the assault and battery of committed
25 by Councilwoman Fiore.

26 166. The City failed to properly supervise, discipline, restrain, train, punish, and/or
27 intervene to stop employees, agent, and/or contractors from destroying the video evidence of the
28 assault committed by Councilwoman Fiore.

1 175. The City refused to take any action to warn, reprimand, discipline, or caution
2 Councilwoman Fiore when the City clearly was in a position to take such disciplinary actions
3 based on her outrageous and shocking conduct toward Councilwoman Seaman.

4 176. The City refused to take any action to warn, reprimand, discipline, or caution
5 Councilwoman Fiore.

6 177. The City refused to take any action to warn, reprimand, discipline, or caution
7 Councilwoman Fiore and granted Councilwoman Fiore preferential treatment.

8 178. The City refused to accommodate Councilwoman Seaman to prevent or limit her
9 from being further harassed, intimidated, threatened, abused, and marginalized by Councilwoman
10 Fiore.

11 179. The City refused to accommodate Councilwoman Seaman by refusing to provide
12 an independent briefing time to prevent or limit her from being further harassed, intimidated,
13 threatened, abused, and marginalized by Councilwoman Fiore.

14 180. The City refused to accommodate Councilwoman Seaman by providing her with
15 ways in which she could distance herself from Councilwoman Fiore to prevent further
16 harassment, intimidation, threats, abuse, and marginalization.

17 181. The City made accommodations for Councilwoman Fiore to have an independent
18 briefing time despite the fact that the City denied the same request from Councilwoman Seaman,
19 claiming that it was no logistically possible.

20 182. The City provided Councilwoman Fiore with preferential treatment and requested
21 accommodations.

22 183. The City changed the terms, conditions, and privileges of Councilwoman
23 Seaman's employment by forcing her to be on the Audit Committee with Councilwoman Fiore.

24 184. The City changed the terms, conditions, and privileges of Councilwoman
25 Seaman's employment by forcing her to remain on the Audit Committee with Councilwoman
26 Fiore, or in the alternative, resign from the committee.

27 185. The City changed the employment terms, conditions, and privileges of
28 Councilwoman Seaman's employment.

1 186. The City retaliated against Councilwoman Seaman in violation of N.R.S. 613.340,
2 and changed her employment terms, conditions, and privileges because she reported the abusive,
3 aggressive, hostile, unpredictable, spiteful, and malicious behavior of Councilwoman Fiore and
4 requested that it be properly addressed.

5 187. The City retaliated against Councilwoman Seaman in violation of N.R.S. 613.340,
6 and changed her employment terms, conditions, and privileges.

7 188. Councilwoman Fiore was permitted to engage in abusive, aggressive, hostile,
8 unpredictable, spiteful, and malicious behavior which created a toxic, intolerable, and hostile
9 work environment.

10 189. Councilwoman Fiore was permitted to engage in abusive, aggressive, hostile,
11 unpredictable, spiteful, and malicious behavior which created a toxic, intolerable, and hostile
12 work environment without fear of reprisal.

13 190. The City discriminated against members of the City Council based on traits
14 protected under N.R.S. 613.330, including but not limited to age, and in violation of Nevada Law.

15 191. As a direct and proximate result of the employment discrimination in violation of
16 N.R.S. 613.330 by the City, Councilwoman Seaman’s employment opportunities, experiences,
17 and future prospects have suffered.

18 192. As a direct and proximate result of the employment discrimination in violation of
19 N.R.S. 613.330 by the City, Councilwoman Seaman suffered physical injuries and bodily pain,
20 humiliation, emotional anxiety, mental anguish, embarrassment, and other injuries.

21 193. As a direct and proximate result of the employment discrimination in violation of
22 N.R.S. 613.330 by the City, Councilwoman Seaman has suffered permanent and severe medical
23 injuries including broken bones, loss of mobility in her hand, severe pain and suffering, and loss
24 of normal life, to the extent that her damages are in a sum exceeding \$15,000.

25 194. As a direct and proximate result of the employment discrimination in violation of
26 N.R.S. 613.330 by the City, Councilwoman Seaman received medical and other treatments for
27 injuries sustained to her hand, all or some of which conditions may be permanent and disabling
28 and, all to her damage in a sum exceeding \$15,000. Additionally, said services, care, and

1 treatment are continuing and may continue in the future.

2 195. As a direct and proximate result of the employment discrimination in violation of
3 N.R.S. 613.330 by the City, Councilwoman Seaman has been limited in certain recreational
4 activities, which have caused, and shall continue to cause, loss of enjoyment of life all to her
5 damage in an amount exceeding \$15,000.

6 196. As a direct and proximate result of the acts of Defendants, and each of them, as
7 alleged herein, Plaintiff has had to retain the services of the law firm of NETTLES | MORRIS to
8 pursue this action and is entitled to recover costs of suit and reasonable attorney’s fees incurred
9 therein.

10 **NINTH CAUSE OF ACTION**

11 **(Defamation)**

12 197. Councilwoman Fiore was permitted to engage in abusive, aggressive, hostile,
13 unpredictable, spiteful, and malicious behavior which created a toxic, intolerable, and hostile
14 work environment in which she made accusations and allegations against Councilwoman Seaman
15 which were not true.

16 198. Councilwoman Fiore knowingly made abusive, aggressive, hostile, unpredictable,
17 spiteful, and malicious false accusations and allegations against Councilwoman Seaman that
18 lacked any factual basis and were patently false.

19 199. Councilwoman Fiore negligently made abusive, aggressive, hostile, unpredictable,
20 spiteful, and malicious false accusations and allegations against Councilwoman Seaman to
21 members of the City Council as well as the press.

22 200. Councilwoman Fiore’s negligent, abusive, aggressive, hostile, unpredictable,
23 spiteful, and malicious false accusations and allegations against Councilwoman Seaman
24 impugned her character and substantially harmed her reputation publicly and professionally.

25 201. Councilwoman Fiore’s negligent, abusive, aggressive, hostile, unpredictable,
26 spiteful, and malicious false accusations and allegations against Councilwoman Seaman created
27 a hostile and difficult work environment for Councilwoman Seaman.

28 202. Councilwoman Fiore knew or should have known that her negligent, abusive,

1 aggressive, hostile, unpredictable, spiteful, and malicious false accusations and allegations
2 against Councilwoman Seaman would cause damage and harm to Councilwoman Seaman's
3 reputation and career.

4 203. Councilwoman Fiore knowingly and intentionally made, abusive, aggressive,
5 hostile, unpredictable, spiteful, and malicious false accusations and allegations against
6 Councilwoman Seaman publicly during City Council meetings and to Mayor Goodman to cause
7 damage and harm to Councilwoman Seaman's reputation and career.

8 204. As a direct result of Councilwoman Fiore's abusive, aggressive, hostile,
9 unpredictable, spiteful, and malicious false accusations and allegations against Councilwoman
10 Seaman publicly during City Council meetings and to Mayor Goodman, Councilwoman Seaman
11 suffered damage and harm to her reputation and career.

12 205. As a direct result of Councilwoman Fiore's abusive, aggressive, hostile,
13 unpredictable, spiteful, and malicious false accusations and allegations against Councilwoman
14 Seaman publicly during City Council meetings and to Mayor Goodman, Councilwoman Seaman
15 suffered damage to her reputation and standing in the community.

16 206. As a direct result of Councilwoman Fiore's abusive, aggressive, hostile,
17 unpredictable, spiteful, and malicious false accusations and allegations against Councilwoman
18 Seaman publicly during City Council meetings and to Mayor Goodman, Councilwoman Seaman
19 has suffered difficulties working and lost the opportunity to fully participate in matters at the City
20 Council.

21 207. As a direct result of Councilwoman Fiore's abusive, aggressive, hostile,
22 unpredictable, spiteful, and malicious false accusations and allegations against Councilwoman
23 Seaman publicly during City Council meetings and to Mayor Goodman, Councilwoman Seaman
24 has lost career opportunities.

25 208. As a direct and proximate result of Councilwoman Fiore's abusive, aggressive,
26 hostile, unpredictable, spiteful, and malicious false accusations and allegations against
27 Councilwoman Seaman, Councilwoman Seaman has suffered permanent and severe injuries
28 including emotional distress, damage to her reputation, loss of work opportunities, and loss of

1 spiteful, and malicious false accusations and allegations against Councilwoman Seaman
2 regarding the violent attack impugned Councilwoman Seaman’s character and substantially
3 harmed her reputation publicly and professionally by placing her in a false light.

4 216. Councilwoman Fiore’s reckless, abusive, aggressive, hostile, unpredictable,
5 spiteful, and malicious false accusations and allegations, against Councilwoman Seaman
6 regarding the violent attack created a hostile and difficult work environment for Councilwoman
7 Seaman by placing her in a false light.

8 217. Councilwoman Fiore knew or should have known that her reckless, abusive,
9 aggressive, hostile, unpredictable, spiteful, and malicious false accusations and allegations
10 against Councilwoman Seaman regarding the violent attack would cause damage and harm to
11 Councilwoman Seaman’s reputation and career by placing her in a false light.

12 218. Councilwoman Fiore’s reckless, abusive, aggressive, hostile, unpredictable,
13 spiteful, and malicious false accusations and allegations against Councilwoman Seaman
14 regarding the violent attack are offensive to a reasonable person.

15 219. Councilwoman Fiore knew or should have known that her reckless, abusive,
16 aggressive, hostile, unpredictable, spiteful, and malicious false accusations and allegations
17 against Councilwoman Seaman regarding the violent attack are offensive to a reasonable person.

18 220. Councilwoman Fiore knowingly and intentionally made, abusive, aggressive,
19 hostile, unpredictable, spiteful, and malicious false accusations and allegations against
20 Councilwoman Seaman regarding the violent attack, publicly during City Council meetings and
21 to Mayor Goodman, to cause damage and harm to Councilwoman Seaman’s reputation and
22 career.

23 221. As a direct result of Councilwoman Fiore’s abusive, aggressive, hostile,
24 unpredictable, spiteful, and malicious false accusations and allegations against Councilwoman
25 Seaman regarding the violent attack, publicly during City Council meetings and to Mayor
26 Goodman, Councilwoman Seaman suffered damage and harm to her reputation and career.

27 222. As a direct result of Councilwoman Fiore’s abusive, aggressive, hostile,
28 unpredictable, spiteful, and malicious false accusations and allegations against Councilwoman

1 Seaman regarding the violent attack, publicly during City Council meetings and to Mayor
2 Goodman, Councilwoman Seaman suffered damage to her reputation and standing in the
3 community.

4 223. As a direct result of Councilwoman Fiore’s abusive, aggressive, hostile,
5 unpredictable, spiteful, and malicious false accusations and allegations against Councilwoman
6 Seaman regarding the violent attack, publicly during City Council meetings and to Mayor
7 Goodman, Councilwoman Seaman has suffered difficulties working and lost the opportunity to
8 fully participate in matters at the City Council.

9 224. As a direct result of Councilwoman Fiore’s abusive, aggressive, hostile,
10 unpredictable, spiteful, and malicious false accusations and allegations against Councilwoman
11 Seaman regarding the violent attack, publicly during City Council meetings and to Mayor
12 Goodman, Councilwoman Seaman has lost career opportunities.

13 225. As a direct and proximate result of Councilwoman Fiore’s abusive, aggressive,
14 hostile, unpredictable, spiteful, and malicious false accusations and allegations against
15 Councilwoman Seaman regarding the violent attack, Councilwoman Seaman has suffered
16 permanent and severe injuries including emotional distress, damage to her reputation, loss of work
17 opportunities, and loss of normal life, to the extent that her damages are in a sum exceeding
18 \$15,000.

19 226. As a direct and proximate result of Councilwoman Fiore’s abusive, aggressive,
20 hostile, unpredictable, spiteful, and malicious false accusations and allegations against
21 Councilwoman Seaman regarding the violent attack, Councilwoman Seaman has been limited in
22 certain recreational and social activities, which have caused, and shall continue to cause, loss of
23 enjoyment of life all to her damage in an amount exceeding \$15,000.

24 227. As a direct and proximate result of the acts of Defendants, and each of them, as
25 alleged herein, Plaintiff has had to retain the services of the law firm of NETTLES | MORRIS to
26 pursue this action and is entitled to recover costs of suit and reasonable attorney’s fees incurred
27 therein.

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WHEREFORE, Plaintiff expressly reserving the right to amend this complaint prior to or at the time of trial of this action, to insert those items of damage not yet fully ascertainable, prays for judgment against the Defendants, and each of them, as follows:

1. For general and special damages exceeding \$15,000;
2. For past and future medical expenses in a sum to be determined at trial;
3. For general damages for pain, suffering, mental distress, anguish and fear, to be determined at trial;
4. For punitive damages as warranted and pursuant to N.R.S. 41.1395 ;
5. For any and all pre- and post-judgment interest allowed under the law;
6. For safety and security policy changes at Las Vegas City Hall;
7. For the resignation of Councilwoman Fiore;
8. For reasonable attorney’s fees plus costs of suit, and
9. For such other and further relief as the court may deem just and proper.

DATED this 26th day of September, 2022.

NETTLES | MORRIS

/s/ Christian M. Morris
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