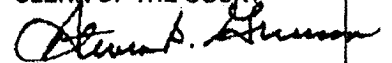


EXHIBIT A

FIRST AMENDED COMPLAINT

EXHIBIT A

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CLERK OF THE COURT



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8 *Attorneys for Plaintiffs Colin Marshall, Caroline Ventola,*
9 *Chris Cheng, Daniel Dykes and Winston Cheng*

10 **DISTRICT COURT**
11 **CLARK COUNTY, NEVADA**

12 COLIN MARSHALL, an individual;
13 CAROLINE VENTOLA, an individual;
14 CHRIS CHENG, an individual; DANIEL
DYKES, an individual; and WINSTON
CHENG, and individual, on behalf of
themselves and all others similarly situated;

15 **Plaintiffs,**

16 **v.**

17 CHRISTOPHER GREGORY ROGERS, an
18 individual; ROGERS HOLDINGS, II, LLC, a
Nevada limited liability company; BARBARA
19 L. ROGERS, an individual and
Trustee/Beneficiary of The Rogers Family
20 Trust; and DANNIE EARL ROGERS, an
individual and Trustee/Beneficiary of The
21 Rogers Family Trust; THE ROGERS
22 FAMILY TRUST, an unknown entity;
23 AIRBNB, INC., a Delaware corporation;
DOES 1-50, unknown individuals; and ROE
24 COMPANIES 1-50, unknown business
entities,

25 **Defendants.**

Case No. A-16-747797-C
Dept. No. XXVIII

13 **FIRST AMENDED COMPLAINT**
14 **(CLASS ACTION)**

15 **(Exempt from Arbitration Pursuant to**
16 **NAR 5)**

17 **JURY TRIAL DEMANDED**

27 For their First Amended Complaint, Plaintiffs Colin Marshall, Caroline Ventola, Chris
28 Cheng, Daniel Dykes and Winston Cheng (together, "Plaintiffs") complain against Defendants

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1 Christopher Gregory Rogers ("Rogers"), Rogers Holdings II, LLC ("Rogers Holdings"), Barbara
2 L. Rogers ("B. Rogers"), Dannie Earl Rogers ("D. Rogers"), the Rogers Family Trust (the
3 "Trust") and Airbnb, Inc. ("Airbnb") (collectively, "Defendants"), as follows:

4 **PARTIES**

5 1. The Plaintiffs, as class representatives, meet all requirements of Nev. R Civ. P. 23.
6 The claims asserted by Plaintiffs on behalf of those similarly situated meet all requirements of
7 Nev. R. Civ. P. 23. The class claims set forth herein, are brought exclusively against Airbnb in
8 this case.

9 2. Upon information and belief, Rogers is a resident of Clark County, Nevada and a
10 Manager of Rogers Holdings.

11 3. Rogers Holdings purports to be a dissolved Nevada limited liability company.

12 4. B. Rogers is a Manager of Rogers Holdings and, upon information and belief, is a
13 Trustee and Beneficiary of the Trust. Upon information and belief, B. Rogers is also Rogers'
14 mother.

15 5. D. Rogers is a Manager of Rogers Holdings and, upon information and belief, is a
16 Trustee and Beneficiary of the Trust. Upon information and belief, D Rogers is also Rogers'
17 father.

18 6. The Trust was formed for the benefit of Rogers, B. Rogers and D. Rogers and
19 upon information and belief, is a revocable living trust.

20 7. Airbnb is a Delaware corporation conducting business in Clark County, Nevada.

21 8. Although conducting business in Nevada, Airbnb is not licensed to conduct
22 business within the State of Nevada.

23 9. The true names and capacities of the Defendants named herein as DOES 1 through
24 50, inclusive, are unknown to Plaintiffs at this time and Plaintiffs therefore sue said Defendants
25 by such fictitious names. Plaintiffs are informed and believe, and therefore allege, that each of
26 the Defendants designated herein as DOES are responsible in some manner for the events and
27 happenings referred to and caused damages proximately to Plaintiffs as herein alleged, and
28 Plaintiffs will ask leave of this Court to amend their First Amended Complaint to insert the true

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1 names and capacities of said DOES when the same become ascertained, and join said Defendants
2 in this action.

3 10. The true names and capacities of the Defendants named herein as ROE
4 COMPANIES 1 through 50, inclusive, are unknown to Plaintiffs at this time and Plaintiffs
5 therefore sue said Defendants by such fictitious names. Plaintiffs are informed and believe, and
6 therefore allege, that each of the Defendants designated herein as ROE COMPANIES are
7 responsible in some manner for the events and happenings referred to and caused damages
8 proximately to Plaintiffs as herein alleged, and Plaintiffs will ask leave of this Court to amend
9 their First Amended Complaint to insert the true names and capacities of said ROE
10 CORPORATIONS when the same become ascertained, and join said Defendants in this action.

11 11. Upon information and belief and at all relevant times, Rogers Holdings was the
12 alter ego of Rogers, B. Rogers, D. Rogers and the Trust.

13 12. Upon information and belief and at all relevant times, the Trust was the alter ego
14 of Rogers, B. Rogers, D. Rogers and Rogers Holdings.

15 13. The acts giving rise to the claims alleged herein occurred in the State of Nevada.

16 **FACTS COMMON TO ALL CLAIMS FOR RELIEF**

17 14. On January 4, 2016, the Plaintiffs travelled to Las Vegas to attend the annual
18 Consumer Electronics Show.

19 15. The Plaintiffs stayed at a home located at 7494 Forestdale, Court, Las Vegas,
20 Nevada 89120, which is located in unincorporated Clark County, Nevada. Plaintiffs were to stay
21 at the home through January 10, 2016, for a total of six (6) nights. The Defendants knowingly
22 and intentionally leased the home where Plaintiffs stayed illegally and in violation of Clark
23 County's short-term rental laws. The home was ostensibly leased by Rogers Holdings.

24 16. The home was rented through Airbnb's website by Plaintiff Winston Cheng.

25 17. When the home was leased, and during the January 2016 time frame, the home
26 was owned by Rogers and/or Rogers Holdings.

27 18. Upon information and belief, Rogers is a convicted felon.
28

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1 19. Recently, the Rogers and/or Rogers Holdings transferred ownership of the home at
2 issue to B. Rogers, D. Rogers and the Trust in an apparent attempt to protect the home from
3 potential creditors, including Plaintiffs.

4 20. The Plaintiffs, including Winston Cheng, who rented the home, were unaware that
5 the home rental was in violation of Clark County, Nevada's short-term rental laws.

6 21. Airbnb, however, was aware that short-term rentals were illegal in both
7 unincorporated Clark County, Nevada and in the City of Henderson, Nevada.

8 22. Airbnb failed to inform the Plaintiffs, including Winston Cheng, the individual
9 who rented the home, and/or the general public that short-term rentals were illegal in both
10 unincorporated Clark County, Nevada and in the City of Henderson, Nevada.

11 23. Airbnb negligently/knowingly misrepresented that that short-term rentals were
12 legal in both unincorporated Clark County, Nevada and in the City of Henderson, Nevada.

13 24. Airbnb, through its website, intentionally promotes, permits, facilitates and
14 coordinates illegal short-term home rentals in unincorporated Clark County, Nevada and in the
15 City of Henderson, Nevada. In doing so, the Defendant derives a profit from these illegal
16 transactions.

17 25. Winston Cheng would not have registered with or through Airbnb's website/mobile
18 phone application or rented a home through it had he known that it intentionally promotes,
19 permits, facilitates and coordinates illegal home rentals.

20 26. To the extent the other Plaintiffs, Colin Marshall, Caroline Ventola, Chris Cheng,
21 and Daniel Dykes, may have registered with or through Airbnb's website/mobile phone
22 application or rented a home through it, they would not have done so had they known that it
23 intentionally promotes, permits, facilitates and coordinates illegal home rentals.

24 27. Upon information and belief, Airbnb conducts little or no background investigation
25 relating to the individuals and/or companies that offer their homes for rent in unincorporated
26 Clark County, Nevada and in the City of Henderson, Nevada, to ensure the privacy, safety and
27 security of the individuals that stay in them.

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1 28. Had Plaintiffs been made aware that Airbnb conducts little or no background
2 investigation relating to the individuals and/or companies that offer their homes for rent they
3 would not have registered with or through its website/mobile phone application or rented a home
4 through it, to the extent they may have done so.

5 29. While the Plaintiffs were initially aware that surveillance cameras were located in
6 the common areas of the home, they were reassured by Rogers and/or his authorized
7 agent/employee that there were no cameras in the private areas of the home, including the
8 bedrooms and bathrooms.

9 30. Later during their stay, the Plaintiffs noticed a smoke detector in a
10 bedroom/bathroom that contained a small camera inside. The camera pointed directly at the
11 bathroom/bedroom.

12 31. Prompted by this discovery, the Plaintiffs began looking in other bedrooms and
13 bathrooms for other cameras.

14 32. The Plaintiffs found other surveillance cameras hidden in the private areas of the
15 home also in smoke detectors.

16 33. The Plaintiffs took several photographs of the cameras located in the smoke
17 detectors.

18 34. The Plaintiffs found other overnight accommodations after finding the hidden
19 surveillance cameras.

20 35. After reporting the discovery of the surveillance cameras to law enforcement, it
21 was determined that there were additional hidden surveillance cameras located in the private areas
22 of the home.

23 36. It was also later determined that private images of the Plaintiffs were captured on a
24 server located inside the home originating from the surveillance cameras in the private areas of
25 the home.

26 37. While it is unclear whether the private images of the Plaintiffs were viewed by
27 anyone other than law enforcement, Plaintiffs allege, upon information and belief, that the images
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1 were or would have been viewed and/or disseminated in some fashion by Rogers and/or his
2 agents/employees.

3 38. None of the Plaintiffs, nor any of the other occupants of the home, consented to the
4 surreptitious recording.

5 39. Airbnb failed to refund Winston Cheng the cost of the rental of the home and he
6 was forced to pay for alternative accommodations for both himself and others.

7 40. Additionally, Airbnb negligently permitted Rogers and/or Rogers Holdings to rent
8 the home to Winston Cheng through its website even though Rogers had repeatedly violated
9 Airbnb's Terms of Service and should have been banned from doing so well before the Plaintiffs'
10 stay at the home.

11 **FIRST CAUSE OF ACTION**
12 **(Invasion of Privacy as to Defendants Rogers, Rogers**
13 **Holdings, B. Rogers, D. Rogers and the Trust)**

14 41. Plaintiffs repeat and reallege each and every fact and allegation contained in this
15 First Amended Complaint and incorporate the same herein by reference as though fully set forth
16 herein.

17 42. Plaintiffs had an actual expectation of seclusion and solitude that was objectively
18 reasonable.

19 43. Rogers, Rogers Holdings, B. Rogers, D. Rogers and the Trust intentionally
20 intruded upon the seclusion of the Plaintiffs.

21 44. Such an intrusion would be highly offensive to a reasonable person.

22 45. As a result of Rogers, Rogers Holdings, B. Rogers, D. Rogers and the Trust's
23 actions and/or inactions, Plaintiffs are entitled to damages in excess of \$15,000.

24 46. As a result of Rogers, Rogers Holdings, B. Rogers, D. Rogers and the Trust's
25 actions and/or inactions, Plaintiffs have been forced to retain the undersigned counsel to prosecute
26 this action and Plaintiffs are entitled to recover reasonable attorney's fees and costs.

27 47. Plaintiffs are informed and believe and thereon allege that Rogers, Rogers
28 Holdings, B. Rogers, D. Rogers and the Trust's conduct was willful, wonton and malicious and

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1 was done with the conscious disregard of Plaintiffs' rights. As a direct result, Plaintiffs are
2 entitled to an award of punitive damages.

3 **SECOND CAUSE OF ACTION**
4 **(Negligence Per Se as to Defendants Rogers, Rogers**
5 **Holdings, B. Rogers, D. Rogers and the Trust)**

6 48. Plaintiffs repeat and reallege each and every fact and allegation contained in this
7 First Amended Complaint and incorporate the same herein by reference as though fully set forth
8 herein.

9 49. Defendants Rogers, Rogers Holdings, B. Rogers, D. Rogers and the Trust's
10 conduct, as described herein, violated NRS 200.604, NRS 116.340, and Clark County Code
11 30.44.010 among other potential statutes, codes, rules and regulations.

12 50. Defendants Rogers, Rogers Holdings, B. Rogers, D. Rogers and the Trust's
13 violation of Nevada law is the cause of Plaintiffs' alleged damages.

14 51. Plaintiffs belong to the class of persons that the statutes were meant to protect.

15 52. Plaintiffs' alleged damages are the type against which the statutes were meant to
16 protect.

17 53. As a result of the Defendants Rogers and/or Rogers Holdings' actions, Plaintiffs
18 are entitled to damages in excess of \$15,000.

19 54. As a result of Defendants Rogers, Rogers Holdings, B. Rogers, D. Rogers and the
20 Trust's actions, Plaintiffs have been forced to retain the undersigned counsel to prosecute this
21 action and Plaintiffs are entitled to recover reasonable attorney's fees and costs.

22 55. Plaintiffs are informed and believe and thereon allege that Defendants Rogers,
23 Rogers Holdings, B. Rogers, D. Rogers and the Trust's conduct was willful, wonton and
24 malicious and was done with the conscious disregard of Plaintiffs' rights. As a direct result,
25 Plaintiffs are entitled to an award of punitive damages.

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THIRD CAUSE OF ACTION
(Intentional Infliction of Emotional Distress as to Defendants Rogers, Rogers Holdings, B. Rogers, D. Rogers and the Trust)

56. Plaintiffs repeat and reallege each and every fact and allegation contained in this First Amended Complaint and incorporate the same herein by reference as though fully set forth herein.

57. Defendants Rogers, Rogers Holdings, B. Rogers, D. Rogers and the Trust's conduct, as described herein, was extreme or outrageous with either the intention of, or reckless disregard for, causing emotional distress to Plaintiffs.

58. Plaintiffs suffered severe or emotional distress as the actual or proximate result of Defendants Rogers, Rogers Holdings, B. Rogers, D. Rogers and the Trust's conduct.

59. As a result of the Defendants Rogers, Rogers Holdings, B. Rogers, D. Rogers and the Trust's actions, Plaintiffs are entitled to damages in excess of \$15,000.

60. As a result of Defendants Rogers, Rogers Holdings, B. Rogers, D. Rogers and the Trust's actions, Plaintiffs have been forced to retain the undersigned counsel to prosecute this action and Plaintiffs are entitled to recover reasonable attorney's fees and costs.

61. Plaintiffs are informed and believe and thereon allege that Defendants Rogers, Rogers Holdings, B. Rogers, D. Rogers and the Trust's conduct was willful, wonton and malicious and was done with the conscious disregard of Plaintiffs' rights. As a direct result, Plaintiffs are entitled to an award of punitive damages.

FOURTH CAUSE OF ACTION
(Negligent Infliction of Emotional Distress as to Defendants Rogers, Rogers Holdings, B. Rogers, D. Rogers and the Trust)

62. Plaintiffs repeat and reallege each and every fact and allegation contained in this First Amended Complaint and incorporate the same herein by reference as though fully set forth herein.

63. Defendants Rogers, Rogers Holdings, B. Rogers, D. Rogers and the Trust's conduct, as described herein, was negligent, causing emotional distress to Plaintiffs.

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1 81. Defendant Airbnb has breached its duty to Plaintiffs and all others similarly
2 situated.

3 82. Defendant Airbnb's conduct is the cause of Plaintiffs' alleged damages and all
4 others similarly situated.

5 83. As a result of Defendant Airbnb's actions, Plaintiffs and all others similarly
6 situated are entitled to damages in excess of \$15,000.

7 84. As a result of Defendant Airbnb's actions, Plaintiffs and all others similarly
8 situated have been forced to retain the undersigned counsel to prosecute this action and are
9 entitled to recover reasonable attorney's fees and costs.

10 85. Plaintiffs and all others similarly situated are informed and believe and thereon
11 allege that the Defendant Airbnb's conduct was willful, wanton and malicious and was done with
12 conscious disregard of Plaintiffs' rights. As a direct result, Plaintiffs and all others similarly
13 situated are entitled to an award of punitive damages.

14 **SEVENTH CAUSE OF ACTION**
15 **(Negligent Misrepresentation as to Defendant Airbnb)**

16 86. Plaintiffs repeat and reallege each and every fact and allegation contained in this
17 First Amended Complaint and incorporate the same herein by reference as though fully set forth
18 herein.

19 87. Defendant Airbnb negligently misrepresents through its website and other media
20 that short-term rentals are legal in both unincorporated Clark County, Nevada and in the City of
21 Henderson, Nevada.

22 88. Alternatively, Defendant Airbnb negligently omits on its website and in other
23 media that short-term rentals are illegal in both unincorporated Clark County, Nevada and in the
24 City of Henderson, Nevada.

25 89. Moreover, the fact that Defendant Airbnb permits short-term rentals in
26 unincorporated Clark County, Nevada and in the City of Henderson, Nevada misleadingly implies
27 that they are in fact legal, when they are not.

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1 90. As a result of the Defendant Airbnb's actions, Plaintiffs and all others similarly
2 situated are entitled to damages in excess of \$15,000.

3 91. As a result of Defendant Airbnb's actions, Plaintiffs and all others similarly
4 situated have been forced to retain the undersigned counsel to prosecute this action and are
5 entitled to recover reasonable attorney's fees and costs.

6 92. Plaintiffs and all others similarly situated are informed and believe and thereon
7 allege that Defendant Airbnb's conduct was willful, wanton and malicious and was done with
8 conscious disregard of Plaintiffs' rights. As a direct result, Plaintiffs and all others similarly
9 situated are entitled to an award of punitive damages.

10 **EIGHTH CAUSE OF ACTION**
11 **(Fraud/Fraud in the Inducement as to Defendant Airbnb)**

12 93. Plaintiffs repeat and reallege each and every fact and allegation contained in this
13 First Amended Complaint and incorporate the same herein by reference as though fully set forth
14 herein.

15 94. Defendant Airbnb intentionally misrepresents through its website and other media
16 that short-term rentals are legal in both unincorporated Clark County, Nevada and in the City of
17 Henderson, Nevada.

18 95. Alternatively, Defendant Airbnb intentionally omits on its website and in other
19 media that short-term rentals are illegal in both unincorporated Clark County, Nevada and in the
20 City of Henderson, Nevada.

21 96. Moreover, the fact that Defendant Airbnb permits short-term rentals in
22 unincorporated Clark County, Nevada and in the City of Henderson, Nevada misleadingly implies
23 that they are in fact legal, when they are not.

24 97. As a result of the Defendant Airbnb's actions, Plaintiffs and all others similarly
25 situated are entitled to damages in excess of \$15,000.

26 98. As a result of Defendant Airbnb's actions, Plaintiffs and all others similarly
27 situated have been forced to retain the undersigned counsel to prosecute this action and are
28 entitled to recover reasonable attorney's fees and costs.

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106. A justiciable controversy has arisen as to the appropriateness of the Defendant Airbnb permitting, promoting and profiting from short-term home rentals through its website, that are illegal in unincorporated Clark County, Nevada and in the City of Henderson, Nevada.

107. A judicial declaration of the parties' rights is necessary to avoid any further dispute relating to the issues set forth herein.

108. As a result of Defendant Airbnb's actions and/or inactions, the Plaintiffs and all others similarly situated have been forced to retain the undersigned counsel to prosecute this action and are entitled to recover reasonable attorney's fees and costs.

ELEVENTH CAUSE OF ACTION
(Injunctive Relief as to Defendant Airbnb)

109. Plaintiffs repeat and reallege each and every fact and allegation contained in this First Amended Complaint and incorporate the same herein by reference as though fully set forth herein.

110. The Plaintiffs hereby request that the Court issue a permanent injunction, enjoining the Defendant Airbnb from permitting short-term rentals through its website in both unincorporated Clark County, Nevada and in the City of Henderson Nevada.

111. As a result of Defendant Airbnb's actions and/or inactions, the Plaintiffs and all others similarly situated have been forced to retain the undersigned counsel to prosecute this action and are entitled to recover reasonable attorney's fees and costs.

WHEREFORE, Plaintiffs and all others similarly situated pray for judgment as follows:

- A. For damages in an amount to be determined at trial, but in excess of \$15,000.00;
- B. For exemplary or punitive damages;
- C. Attorney's fees and costs of suit;
- D. Prejudgment and post-judgment interest on the amounts owed;
- E. For declaratory and injunctive relief as set forth above; and

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F. Any further relief this Court deems proper.

DATED this 6th day of December, 2017.

SEMENZA KIRCHER RICKARD

/s/ Lawrence J. Semenza, III

Lawrence J. Semenza, III, Bar No. 7174

Christopher D. Kircher, Bar No. 11176

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CERTIFICATE OF SERVICE

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Pursuant to Nev. R. Civ. P. 5(b), I hereby certify that I am an employee with Semenza Kircher Rickard, and that on the 6th day of December, 2017, I caused to be sent via Odyssey's online e-file and serve system, a true copy of the foregoing **FIRST AMENDED COMPLAINT** to the following registered e-mail addresses:

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