

1 **COMP**

2 BOBBY LEN FRANKLIN (*pro se*)  
3 d/b/a/ DL&S Development Co.  
4 2451 N. Rainbow Blvd. Unit 2037  
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**FILED**  
AUG 16 2018  
District Court Clerk

8 COPY  
9 **EIGHTH JUDICIAL DISTRICT COURT**  
10 **CLARK COUNTY, NEVADA**

11 BOBBY LEN FRANKLIN,

12 Plaintiff,

13 vs.

14 WILLIAM R. URGA; D.J. LAUGHLIN;  
15 SHELLEY YOUNG, the Legal Counsel  
16 Administrator of the STATE BAR OF  
17 NEVADA ,

18 Defendants.

CASE NO.: A-18-779502-C

DEPT. NO.: 16

19 **COMPLAINT**

20 Plaintiff, BOBBY LEN FRANKLIN, in proper person, complains against Defendants,  
21 WILLIAM R. URGA; D.J. LAUGHLIN; SHELLEY YOUNG, the Legal Counsel Administrator  
22 of the STATE BAR OF NEVADA, as follows.

23 **I. PARTIES**

24 1. Plaintiff, BOBBY LEN FRANKLIN (hereinafter "Plaintiff") is an individual (Desert Land  
25 Entry) business man who is currently, and was at all relevant times herein, a resident of the State  
of Nevada, County of Clark, City of Las Vegas.

2. Defendant, WILLIAM R. URGA (hereinafter "Defendant Urga") is a resident of Las  
Vegas, NV; he is an attorney for and member of the State Bar of Nevada; and, he is the Director  
and the Treasurer of his Jolly, Urga & Wirth, Ltd law firm corporation, whose Registered Agent

1 is named Jolly Urga Woodbury Holthus & Rose, and may be served personal and/or corporate  
2 legal process at 330 S. Rampart Blvd. Suite 380, Las Vegas, NV. 89145.

3 3. Defendant, D.J. LAUGHLIN (hereinafter “Defendant Laughlin”) is an individual business  
4 man who is currently, and was at all relevant times herein, a resident of the State of Nevada,  
5 County of Clark, Town of Laughlin, at 1650 S. Casino Drive, PMB 500, Laughlin, NV. 89029.

6 4. Defendant, SHELLY YOUNG (hereinafter “Defendant Young”) is an individual, who is  
7 the Legal Counsel Administrator for Defendant STATE BAR OF NEVADA (hereinafter  
8 “Defendant SBN”), who may be served legal process in both her individual and corporate  
9 capacities at State Bar of Nevada, 3100 W. Charleston Blvd. Suite 100, Las Vegas, NV. 89102.

10 5. All of the acts and/or failures to act alleged herein were duly performed by and/or are  
11 attributable to Defendants, individually or acting by and through their agents or employees. Said  
12 acts and/or failures to act were within the scope of any agency or employment, or were ratified  
13 by Defendants.

## 14 **II. FACTS**

15 6. In **1988**, Plaintiff purchased 80 acres of public lands in Laughlin NV, from the Bureau of  
16 Land Management, under the 1877 Desert Land Act of Congress.

17 7. On **9/20/1993**, Plaintiff re-recorded his *stare decisis* First Title rights to such 80 acres,  
18 in the Clark County Recorder’s Office, for security reasons:

19 <https://drive.google.com/file/d/0B0jiIQV1AnnCc0xnQU5fdkRsQ2c/view>

20 8. Subsequently, Defendant Laughlin began flying his helicopter over Plaintiff’s 80 acres,  
21 during the years Plaintiff was improving and developing infrastructure on his 80 acres.

22 9. In **2006**, Defendant Laughlin filed his Title rights on such 80 acres, in the Clark County  
23 Recorder’s Office: [https://docs.google.com/document/d/1ZB6adR\\_IlhUbBRkkUcSFn9ALPN2\\_PITTyPZOrKvfsUQ/edit](https://docs.google.com/document/d/1ZB6adR_IlhUbBRkkUcSFn9ALPN2_PITTyPZOrKvfsUQ/edit)

24 which is clearly “adverse” to Plaintiff’s First Title on such 80 acres, under NRS 40.010.  
25

1           10. On **12/4/2015**, Plaintiff filed Quiet Title Action (“QTA”) against Defendant Laughlin, in  
2 the Clark County District Court, for NRS 40.010 relief, to judicially determine who possesses the  
3 “superior title” on such 80 acres.

4           11. Defendant Urga was Defendant Laughlin’s retained lead attorney in such QTA. In the  
5 three hearings: [https://img1.wsimg.com/blobby/go/15ed7369-3e99-4134-bab0-d764ba2c0ea7/downloads/1bo339pas\\_413412.pdf](https://img1.wsimg.com/blobby/go/15ed7369-3e99-4134-bab0-d764ba2c0ea7/downloads/1bo339pas_413412.pdf), the  
6 Plaintiff alleged and still alleges that Defendant Urga perjured five counts of his fraud on the  
7 District Court minutes, to achieve such QTA case dismissed with prejudice in its entirety.

8           12. On **4/4/2016**, the District Court Judge entertained Defendant Urga’s perjured five counts  
9 of fraud on the District Court minutes, alleged by Plaintiff, and “dismissed [the QTA] with  
10 prejudice in its entirety”. Around that same day, Plaintiff filed the complaint with the Defendant  
11 SBN against Defendant Urga’s alleged misconduct. Subsequently, the Defendant SBN instructed  
12 Plaintiff to re-file a complaint online, after Plaintiff exhaust the Appellate Courts.

13           13. On **6/12/2017**, after both Nevada Appellate Courts failed to review Defendant Urga’s  
14 perjury and fraud on the District Court alleged by Plaintiff, the U.S. Supreme Court denied  
15 Plaintiff’s timely petition for writ of certiorari to review it.

16           14. On **6/17/2017**, Plaintiff filled out the SBN online complaint form against Defendant  
17 Urga’s professional misconduct alleged by Plaintiff, and attempted to upload the appellate  
18 courts’ record Plaintiff exhausted, with a photo of the billboard that Defendant Laughlin had on  
19 Plaintiff’s Titled 80 acres to sell it: <https://drive.google.com/open?id=0B0jiIQV1AnnCdDlwd1dWVjJKWUE>  
20 However, the upload button and the submit button did not work on their SBN website.

21           15. On or around **6/20/2017**, Plaintiff drove to the SBN office on W. Charleston Blvd, and  
22 asked the receptionist if Plaintiff’s online complaint and two attachments were received. After an  
23 hour of excuses by other SBN employees, they told Plaintiff they received all of it. Plaintiff  
24 asked them for a filed time stamp case number on it, or anything to prove SBN received it. They  
25 told Plaintiff in two weeks they would mail Plaintiff the filed case number. That never happened.

1           16. On **6/22/2017**, the Assistant Bar Counsel for SBN, Phillip J. Pattee mailed his letter to  
2 Plaintiff, concluding that “No further action will be taken in this matter.” However, as noted  
3 above SBN had *not* received Plaintiff’s online complaint or its two attachments, and Pattee wrote  
4 and sent that letter to Plaintiff to cover up for the lies his fellow SBN employees told to Plaintiff.

5           17. On **6/25/2017**, Plaintiff successfully filed the SBN online complaint form and uploaded  
6 the two attachments with it: <https://drive.google.com/open?id=0B0jiIQV1AnnCVXd1eEdjenpocGM> The next day,  
7 Plaintiff received Pattee’s cover up letter dated **6/22/2017**.

8           18. On **6/27/2017**, Plaintiff sent SBN Legal Counsel Pattee the letter to remind Pattee what  
9 the facts are, and what his duty is: [https://drive.google.com/open?id=19zEkqZ2OlrFfrMyYBCqBnUhtKBvNy\\_p5](https://drive.google.com/open?id=19zEkqZ2OlrFfrMyYBCqBnUhtKBvNy_p5)

10           19. On **7/19/2017**, Plaintiff found the reason why the SBN were playing all these deceitful  
11 games on Plaintiff. Defendant Urga is/was a “member of the Disciplinary Board for the Southern  
12 District of the Nevada State Bar.”: <https://drive.google.com/open?id=0B0jiIQV1AnnCdkRvMjJaSU5HNEk>

13           20. On **7/24/2017**, Plaintiff *certified* Pattee a letter, to remind him what his *duty* is as Bar  
14 Counsel in this case: <https://drive.google.com/open?id=0B0jiIQV1AnnCc1mWXpKMGhOTmM> Certified or not,  
15 Pattee never responded to any letters that Plaintiff mailed to him.

16           21. Subsequently, Plaintiff drove to SBN office and asked the receptionist to speak with  
17 counsel Pattee. She said Pattee won’t be in today. Plaintiff asked for Pattee’s supervisor. After  
18 making several calls, she replied, “please leave a note with me”! Plaintiff replied, I am staying  
19 here until I speak with Pattee’s supervisor. An hour later, two gentlemen walked over to Plaintiff  
20 and invited him into their conference room. One man said he is Pattee’s supervisor, the other said  
21 he is on Pattee’s counsel team. Plaintiff showed them the documented facts; the evidence; and,  
22 the gross negligence of duty and cover ups done by Bar Counsel Pattee. Bar Counsel (Hunerton)  
23 concluded that he will officially consider the facts and evidence, and we parted as friends.

24           22. On **4/2/2018**, Plaintiff emailed Defendant Young with the hyperlinks that unequivocally  
25 proves beyond any doubt that Defendant Urga did in fact commit “five counts” of perjury and

1 fraud on the district court minutes to extort Plaintiff's 80 acre First Title for Defendant Laughlin:  
2 <https://drive.google.com/open?id=1bEkkhNV8WrlwsTrfXBJj3rdb0d6Wuiu4> : Defendant Young did not respond.

3 23. On **5/1/2018**, SBN Legal Counsel Hunterton mailed Plaintiff a letter (with a case number  
4 on it), to imply Plaintiff's evidence was not clear enough to investigate or to depose Defendant  
5 Urga's perjury and fraud on the district court minutes alleged by Plaintiff; and he concluded,  
6 "this matter is dismissed": <https://drive.google.com/open?id=1CGkhlZsEbX7cmRF7ZaWuV01NOu8m-BS1>

7 24. On **5/18/2018**, Plaintiff emailed Defendant Young; the SBN president and vice president;  
8 and, SBN Legal Counsel Hunterton a *Request for Reconsideration* of the evidence overlooked,  
9 again with the pdf hyperlinks that unequivocally proves beyond any doubt that Defendant Urga  
10 did in fact commit the "five counts" of perjury and **fraud** on the district court minutes to gag  
11 Plaintiff's 80 acre First Title rights, for his client Defendant Laughlin, in their extortion racket:  
12 <https://drive.google.com/open?id=1wUhgKETD8mBsRmaedcY9q-L003J91MDL>

13 25. Because of Defendant Urga's undisputed 'five counts' of *attorney misconduct*, Plaintiff  
14 has been deemed a "vexatious litigant" by the district court, and therefore Plaintiff is gagged and  
15 prohibited therein to quiet title with Defendant Laughlin for NRS 40.010 relief.

16 26. Because of the four elements of *gross negligence* done by Defendant Young and her  
17 named Bar Counselors; their derelictions of their duty owed to Plaintiff; and, their Defendant  
18 SBN agency mismanagement, Plaintiff has suffered years of obstruction of justice to ever quiet  
19 his First Title rights against Defendant Laughlin's adverse Title, under NRS 40.010. In fact,  
20 Plaintiff may never get a fair hearing or trial in district court to quiet his Title with Defendant  
21 Laughlin, until Defendant Urga's blatant perjury and fraud on the district court minutes is  
22 resolved. Defendant Young and her administered Defendant SBN Legal Counselors knew, or  
23 should have known of the foreseeable damages to Plaintiff's person, business and property  
24 rights, that Defendant SBN Legal Counselors dismissed and refused to investigate or resolve.

25 27. And, the alleged Defendant(s)' conspired **fraud** is grounds for *intentional tort* relief.

1 28. After Defendants' answer to this complaint is filed, they will be subject(s) to further  
2 discovery, interrogatory and injunctive relief.

3 **III. CLAIMS FOR RELIEF**

4 **A. Attorney Misconduct**

5 29. Defendant Urga has illegally and unequivocally committed "five counts" of perjury and  
6 fraud on the district court minutes, in violation to the *Nevada Rules of Professional Conduct*, and  
7 Defendants Young and SBN Legal Counsel have conspired to dismiss such *attorney misconduct*.

8 30. As a result to such conspired *attorney misconduct* as set forth above, Plaintiff sustained  
9 punitive damages in an amount in excess to \$15,000.00, which will be proven at jury trial.

10 **B. Gross Negligence**

11 31. Plaintiff has shown the: (1) **Duty**(s) of care owed by the Defendants to the Plaintiff;  
12 (2) The breach of such **duty**(s); (3) The actual causal connection between the Defendants'  
13 **conduct** and the resulting harm; and, (4) The **proximate cause**, which relates to whether the  
14 harm was foreseeable.

15 32. Defendants Young and SBN counsel in harmony breached their duties as set forth above.

16 33. Defendants' breach directly and proximately caused the injury to Plaintiff's person; to  
17 his business; and, to his existing First Title property rights as set forth above.

18 34. Plaintiff's injuries have resulted in personal, business and property compensatory and  
19 punitive damages in excess of \$15,000.00, which will be proven at jury trial.

20 **C. Intentional torts**

21 35. Defendants' *five* counted acts of perjury and **fraud** on the district court minutes to gag  
22 and extort Plaintiff's 80 acre First Title rights are as set forth above.

23 36. Defendant Urga conspired with his client Defendant Laughlin to do so.

24 37. Plaintiff's injuries have resulted in personal, business, and property compensatory and  
25 punitive damages in excess of \$15,000.00, which will be proven at jury trial.

1 **III. PRAYER FOR RELIEF**

2 38. **Wherefore**, Plaintiff prays for the following relief:

- 3 1. For a judicial court ORDER to examine Plaintiff’s existing First Title (above) against
- 4 Defendant D.J. Laughlin’s adverse Title on the described 80 acres, to finally determine which
- 5 party holds the legal “superior title” under NRS 40.010;
- 6 2. For compensatory personal injury, business and property damages and expenses, for past,
- 7 present, and future in excess of \$15,000;
- 8 3. For general damages for past, present, and future pain and suffering, and other damages in
- 9 excess of \$15,000;
- 10 4. For interest at the statutory rate; and,
- 11 5. For such other and further relief as this court deems just and equitable.

12 Respectfully submitted,

13 /s/ Bobby Len Franklin  
BOBBY LEN FRANKLIN

08/15/2018  
DATED

14 If executed in this State: “I declare under penalty of perjury that the foregoing is true and  
15 correct.” 1.

16 Executed on: 08/15/2019  
17 (date)

/s/ Bobby Franklin  
(signature)

18  
19 By: /s/ Bobby Len Franklin  
20 BOBBY LEN FRANKLIN  
21 dba: DL&S Development Co.  
22 2451 N. Rainbow Blvd.  
23 Unit 2037  
24 Las Vegas, NV. 89108  
25  
830-822-4791  
dlepatent@hotmail.com  
(Plaintiff *pro se*)

1 **VERIFICATION**

2 (Per NRS 15.010)

3 Under penalties of perjury, the undersigned declares that he is the Plaintiff named in the  
4 foregoing Complaint and knows the contents thereof; that the pleading is true of his own  
5 knowledge, except as to those matters stated on information and belief, and that as to such  
6 matters he believes it to be true.

7 DATED this 15<sup>th</sup> day of August, 2018.

8  
9 *I declare under penalty of perjury under law of  
10 the State of Nevada that the foregoing is true and  
11 correct.*

12 /s/ Bobby Franklin

Signature

13  
14 Bobby Franklin

Print Name