

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
RENO DIVISION**

United States District Court
400 South Virginia Street
Reno, Nevada 89501

Case No.: _____

Official Communications for Plaintiffs:
ssr4gc@gmail.com

PLAINTIFFS

JEANNETTE PORRAZZO,

an individual, and on behalf of all others similarly situated and DOES 1-100, inclusive, appearing **pro se**; Founder and Executive Director of the Stop Sierra Reflections for Good Coalition (SSR4GC);

Plaintiff Jeannette Porrazzo, brings this action on their own behalf and anticipates the joinder of additional parties, including but not limited to Sovereign Tribal interests and local residents, as their identities and formal authorizations are finalized.

AND THE PROTECTED CLASSES, consisting of:

(a) The Sovereign Nation Class, including members of **FEDERALLY RECOGNISED SOVEREIGN TRIBAL NATIONS AND INDIGENOUS SOVEREIGN ENTITIES** and **affiliated tribal members asserting unextinguished Aboriginal Title**;

(b) The Homeowner and Commercial Property Owner Classes, consisting of purchasers in good faith who currently own residential or commercial property within ZIP Codes **89704, 89521, and 89511**, including St. James's Village; and

(c) The Prior Owners Class, consisting of former residential or commercial property owners within ZIP Codes **89704, 89521, and 89511** who were subject to taxation, clouded title, or economic loss arising from the same unlawful chain of title and governmental actions alleged herein;

and all similarly situated persons to be identified and named following discovery.

To be included in the protected class, an individual must have resided in the area for at least 20 years or be a coalition member residing here for at least 2 years.

Plaintiffs expressly reserve the right to amend this Complaint to add named plaintiffs and subclasses consistent with Rule 15 and applicable law.

V.

DEFENDANTS

State Defendants

1. **STATE OF NEVADA**
2. **NEVADA DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES (DCNR)**
3. **JAMES A. SETTELMAYER**, in his official capacity as Director, DCNR
4. **NEVADA DIVISION OF STATE PARKS**
5. **ROBERT “BOB” MERGELL**, in his official capacity as Administrator, Nevada Division of State Parks
6. **ARTHUR KRUPICZ**, in his official capacity as Nevada State Historic Preservation Officer (SHPO)

County Defendants

7. WASHOE COUNTY

8. WASHOE COUNTY BOARD OF COMMISSIONERS, in their official capacities, including but not limited to:

- ALEXIS HILL (District 1)
- MICHAEL CLARK (District 2)
- MARILUZ GARCIA (District 3)
- CLARA ANDRIOLA (District 4)
- JEANNE HERMAN (District 5)

9. WASHOE COUNTY PLANNING COMMISSIONERS (2006–Present), including all commissioners who voted on or approved the original **2006 Tentative Map** and subsequent extensions for the Sierra Reflections / Silver Reflections project, **identified herein as DOES 1–25**, to be named upon discovery.

Advisory Board Defendants

10. SOUTH VALLEYS CITIZENS ADVISORY BOARD (CAB), an advisory body appointed by Washoe County, including:

11. LINDA/LYNDA BELL, former Chair of the South Valleys CAB, in her individual capacity;

12. ALL ORIGINAL AND CURRENT MEMBERS OF THE SOUTH VALLEYS CAB,

identified herein as **DOES 1–100**, to be named upon discovery.

Developer & Private Defendants

13. **WORLD PROPERTIES INC.**, a Nevada corporation (including all subsidiaries, alter egos, and affiliated entities)
14. **FRED WOODSIDE**, Principal / Executive, World Properties Inc.
15. **KEN KRATER**, K. Krater Consulting, project representative
16. **BRYAN DRAKULICH**, Broker / Owner, Drakulich Commercial Partners
17. **THE WINTERS FAMILY**, including trusts, heirs, successors, and assigns
18. **THE SCRIPPS FAMILY**, including estates, trusts, successors, and assigns

Doe Defendants

19. **DOES 1–100**, inclusive of all persons, entities, shell companies, agents, consultants, and co-conspirators whose identities are presently unknown but who participated in or benefitted from the acts alleged herein.
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PROTECTED CLASS EXCLUSIONS

The following persons and entities are **expressly excluded** from all Protected Classes:

- Any individual or entity affiliated with **World Properties Inc. and its subsidiaries, agents and does 1-100**
- Any individual or entity affiliated with the **South Valleys Citizens Advisory Board**
- **Lynda/Linda Bell**
- Any commercial property owner whose holdings are directly or indirectly associated with World Properties Inc. or its affiliates

Any individual who has engaged in slander, libel, defamation, harassment, or stalking of Coalition members or representatives is expressly excluded from the Protected Classes and is not eligible for inclusion in the Coalition or for any relief sought herein.

DEFENDANTS

20. Developer and Ownership Defendants

Defendant **World Properties, Inc.**, together with all parent companies, subsidiaries, affiliated entities, successors, predecessors, assigns, agents, representatives, managers, members, partners, investors, shell entities, and alter egos thereof, including but not limited to all entities and individuals exercising ownership or control over the Sierra Reflections and St. James Village properties.

21. Heirs, Estates, and Successor Interest Defendants

All heirs, estates, trustees, beneficiaries, and successor-in-interest holders of any ownership, financial, or controlling interest in the subject properties, including

interests obtained by inheritance, assignment, or transfer, whether disclosed or undisclosed.

22. Governmental Defendants – Washoe County

Defendant **Washoe County**, Nevada, including but not limited to its departments, agencies, boards, officers, employees, and officials acting in their official capacities.

23. Planning and Zoning Defendants (2006–Present)

All individuals who served, at any time from 2006 to the present, as members, alternates, staff, or decision-makers of the Washoe County Planning Commission or any successor or predecessor planning body that reviewed, approved, extended, or otherwise acted upon the Sierra Reflections tentative map, zoning, or development approvals.

24. Advisory Board Defendants

The **South Valleys Citizens Advisory Board**, including all current and former members, chairs, vice-chairs, officers, and participants, sued in their official capacities for actions and omissions taken under color of county appointment or authority related to the Sierra Reflections project.

25. Individual Defendants to Be Named Upon Amendment

Certain individuals whose identities, roles, and conduct are known to Plaintiffs but who will be specifically named upon amendment following initial filing and discovery, including individuals associated with developer advocacy, advisory board influence, or obstruction of required tribal consultation.

26. DOE Defendants

Defendants **DOES 1–100**, inclusive of all persons and entities who participated in, aided and abetted, conspired in, benefitted from, or failed to prevent the acts and omissions alleged herein, whose true names and capacities are presently unknown to Plaintiffs. Plaintiffs will amend this Complaint to allege their true names and capacities when ascertained.

JURISDICTION AND VENUE

27. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 because the claims arise under federal law, including the Native American Graves Protection and Repatriation Act (NAGPRA), the Archaeological Resources Protection Act (ARPA), and other federal statutes protecting tribal lands and cultural heritage. Additionally, this Court has jurisdiction under 28 U.S.C. § 1362 as the action is brought by a recognized Indian tribe.

28. Venue is proper in this Court under 28 U.S.C. § 1391(b) because a substantial part of the events or omissions giving rise to the claims occurred within this district. The properties in question, the defendants' actions, and the impacted tribal lands are all located within the territorial jurisdiction of this Court.

IV. FACTUAL BACKGROUND

A. The Washoe Tribe's Original Occupation and Unextinguished Aboriginal Title

1. The Washoe Tribe are the original and continuous occupants of what is now known as Washoe Valley, Pleasant Valley, and surrounding areas of western Nevada. Archaeological, cultural, and oral-history evidence establishes continuous Washoe presence in this region for approximately **30,000 years**, long before the formation of the State of Nevada or the United States.
2. Washoe Valley, Pleasant Valley, and portions of Carson Valley constituted the **traditional winter home** of the Washoe people. These valleys contained permanent water sources, springs, hunting grounds, fisheries, and burial areas integral to Washoe survival, culture, and spirituality.
3. The Washoe Tribe never entered into a ratified treaty with the United States or the State of Nevada ceding, selling, or relinquishing title to these lands. No lawful extinguishment of Washoe Aboriginal Title has ever occurred.
4. Under the **Non-Intercourse Act (25 U.S.C. § 177)**, any conveyance of tribal land absent federal treaty approval is void. Accordingly, all purported

transfers of Washoe Valley land arising from non-treaty dispossession are legally defective.

B. Forcible Removal, Violence, and Mass Death in the Mid-1800s

5. In the mid-1800s, the Washoe Tribe were forcibly removed from their winter home lands through violence, coercion, and armed intimidation carried out by settlers and state-sanctioned actors.
6. Historical accounts and tribal testimony establish that **approximately 4,500 Washoe people were killed**, leaving an estimated **500 survivors**, many of whom were women and children.
7. The Washoe Tribe were driven from their lands **at gunpoint**, deprived of access to food sources, water, and sacred sites. This removal was not consensual, not compensated through treaty, and constituted forcible dispossession under duress.
8. Any subsequent claims of title derived from this period are void under basic principles of property law, contract law (duress), federal Indian law, and international human rights norms.

C. Theodore Winters and the Initial Illegal Seizure of the Valley

9. **Theodore Winters** was a central figure in the initial seizure of Washoe Valley lands. Winters claimed control over large portions of Washoe Valley, Pleasant Valley, and surrounding water sources without lawful title, treaty, or purchase from the Washoe Tribe.
10. Winters fenced off the valley, seized control of springs and water access, and deprived the Washoe people of their traditional food and water sources, accelerating starvation, displacement, and death.

11. Winters' actions constituted **forcible entry, conversion, and theft of land**, forming the first link in a broken chain of title that persists to the present day.
 12. Notably, Winters seized the Washoe Tribe's **winter home**, a fact that underscores the intentionality and severity of the dispossession.
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D. Burial Grounds and Sacred Sites

13. Washoe Valley and Pleasant Valley contain **known and suspected Native American burial grounds**, including areas later disturbed during infrastructure construction.
14. When U.S. Highway 395 was constructed near the Eastlake intersection, **human remains were discovered** in the same general area now targeted for development by World Properties, Inc., including the Sierra Reflections and St. James sites.
15. These lands are further burdened by environmental contamination, as discussed below, compounding the risk of irreversible harm to ancestral remains.

E. Environmental Contamination and the Carson River Mercury Superfund Site

16. Washoe Valley lies within the **Carson River Mercury Superfund Site**, designated by the Environmental Protection Agency in **1990**.
17. Washoe Valley was the **epicenter of historic mining and ore-processing activity**, containing at least **13 milling sites**, including one directly adjacent to Steamboat Creek near the proposed development area.

18. Mercury, arsenic, lead, and other heavy metals were released into soil, sediment, groundwater, and waterways, creating long-term contamination that persists today.
 19. Fish in Washoe Lake and Steamboat Creek are **unsafe for human or wildlife consumption**, as documented by EPA and state agencies.
 20. Areas proposed for development include locations that have **never been fully tested**, including known burial areas, raising substantial concerns that contamination levels were intentionally or recklessly avoided.
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F. Hydrological Connectivity and Downstream Tribal Harm

21. Washoe Lake drains into **Steamboat Creek**, which flows into the **Truckee River**, ultimately terminating at **Pyramid Lake**, home to the Pyramid Lake Paiute Tribe.
22. Any disturbance of contaminated soils or groundwater in Washoe Valley threatens downstream waters, fisheries, and tribal lands, extending harm beyond Washoe Valley itself.
23. This hydrological connection renders the proposed development a matter of **intertribal, interstate, and federal concern**.

23.1 Failure to Secure or Apply for State Water Rights (Newly Discovered Evidence of Bad Faith)

As of **January 6, 2026**, it has been confirmed that **World Properties, Inc.**, nor any known subsidiary or affiliated entity, has filed an application that was approved (past application rejected or expired years ago) with the Nevada Division of Water Resources (“NDWR”) for water rights, a

point of diversion, or groundwater appropriation associated with the proposed Sierra Reflections development. This confirmation was obtained through inquiry into NDWR public records and corroborated through local water administration channels. Despite this, the Developer is actively proceeding toward the **January 6, 2026 Washoe County Planning Commission hearing** for a project proposing approximately **960 residential units**, without having initiated the mandatory state-level water rights process required under **NRS Chapter 533**.

This omission is not benign. Under **NRS 533.365**, the filing of a water rights application triggers a **statutory 30-day public protest period**, during which affected citizens, the Coalition, and the Washoe Tribe would have the right to formally object to the diversion of groundwater. By advancing local land-use approvals **without first filing with NDWR**, the Developer has effectively suppressed public participation, avoided regulatory scrutiny, and attempted to deprive affected parties of their due-process rights under Nevada water law.

The failure to file is especially egregious given the project's location within and adjacent to the **Carson River Mercury Superfund Site**, where groundwater contamination from mercury and arsenic is well-documented. Proceeding without an approved water source, contamination analysis, or NDWR oversight demonstrates a **pattern of bad faith conduct**, not an administrative oversight. This tactic mirrors the Developer's broader reliance on outdated approvals and a decades-old tentative map—commonly referred to as a “zombie project”—to evade modern environmental, public-health, and tribal consultation requirements.

Accordingly, any County approval granted in the absence of an active or pending NDWR water rights application would be **arbitrary and capricious**, unsupported by substantial evidence, and contrary to Nevada law. This newly discovered procedural non-compliance independently warrants **immediate injunctive relief**, as the project lacks a lawful water foundation and is being advanced through a deliberate “fait accompli” strategy designed to bypass state regulation, public protest, and sovereign tribal interests.

Basin Number: Basin 088 (Pleasant Valley/Washoe Valley)

• **Primary APNs:**

- 046-060-45
- 046-060-47
- 046-080-40
- 046-090-01

• **Location:** Bordered by Pagni Lane and Old US Highway 395, near Little Washoe Lake.

G. Continuing Harm and Ongoing Development Efforts

24. Despite clear evidence of unextinguished Aboriginal Title, burial grounds, environmental contamination, and statutory consultation failures, development efforts have continued for decades.

25. The Sierra Reflections project represents a continuation of the same pattern of dispossession, now framed as private development rather than overt violence.

26. Because development efforts remain ongoing, the harms described herein are **continuous**, and any statute of limitations defense is inapplicable.

H. December 2025 Confirmation by Tribal Leadership

27. In **December 2025**, Plaintiff met in Washoe Valley for a multi-hour meeting with **Chairman Serrell Smokey** and **Chairman Billy Hawk Enos**, representing Washoe Tribal leadership.

28. During this meeting, Tribal leadership confirmed:

- The Washoe Tribe were forcibly removed from these lands at gunpoint;
- No treaty of cession was ever signed;
- The proposed development area includes sacred burial grounds;
- Washoe Valley has been continuously recognized by the Tribe as their winter home.

29. This meeting confirmed Plaintiff's recent discovery of critical facts underlying this action and further defeats any statute-of-limitations defense.

I. Reparations Are Not a Land Sale

30. Any monetary payments previously made by the federal government to the Washoe Tribe were **reparations for mass killing, trauma, and historical violence**, not payment for land.

31. Acceptance of reparations for human rights abuses does not constitute a treaty, convey title, or extinguish Aboriginal land rights.

J. Summary

32. The chain of title to Washoe Valley and Pleasant Valley is broken at its inception.

33. The land was taken through violence, never lawfully conveyed, never extinguished by treaty, and remains burdened by burial grounds, environmental contamination, and ongoing statutory violations.

34. The present development effort represents an extension of historical wrongdoing and poses immediate, irreparable harm absent judicial intervention.

V. THE BROKEN CHAIN OF TITLE AND PRESENT-DAY OWNERSHIP

A. The Legal Consequence of an Illegitimate Origin

1. Because the Washoe Tribe's Aboriginal Title was never lawfully extinguished by treaty, **no subsequent private or governmental actor could acquire valid title** to the lands comprising Washoe Valley and Pleasant Valley.
2. Under longstanding principles of property law, **a grantor cannot convey greater title than they possess**. Where the original taking is void, all derivative conveyances are likewise void.
3. This principle is codified in both state and federal law, including:
 - The **Non-Intercourse Act (25 U.S.C. § 177)**;
 - The doctrine of **void ab initio conveyances**;
 - Federal common law governing Aboriginal Title and forcible dispossession.
4. Accordingly, every deed purporting to convey ownership of the subject lands traces back to an **unlawful origin**, rendering the entire chain of title defective as a matter of law.

B. The Winters Line as the First Defective Link

5. Theodore Winters' seizure of Washoe Valley lands was accomplished without treaty, purchase, or lawful authority and through coercion and violence.

6. Winters' claimed ownership was therefore **never valid**, and any subsequent transfers derived from his asserted control are legally void.
 7. Winters' actions represent the first defective link in a chain of title that has been repeatedly relied upon—but never cured—for more than a century.
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C. State Adoption, Recording, and Amplification of the Defect

8. Rather than remedy the unlawful dispossession, the State of Nevada and Washoe County **recorded, recognized, and relied upon** title claims originating in this defective chain.
 9. By recording and enforcing these instruments, state and county actors **amplified and perpetuated the original illegality**, converting a violent taking into an administrative fiction of lawful ownership.
 10. The State's later monetary payments to the Washoe Tribe—made as reparations for mass violence and historical trauma—did not and could not cure the title defect, as:
 - Reparations are not land sales;
 - No treaty of cession was executed;
 - No congressional act extinguished Aboriginal Title.
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D. Subsequent Private Transfers and the Illusion of Marketable Title

11. Over time, parcels derived from this defective chain were transferred to private actors, developers, and holding entities, each relying on the

appearance of recorded title, not its legal validity.

12. These transfers include large-scale development holdings ultimately consolidated under entities such as **World Properties, Inc.**, which now assert ownership over the Sierra Reflections and St. James parcels.
13. While current defendants may claim to be “purchasers,” **good-faith purchase cannot cure a void title** where the original conveyance was unlawful.
14. Recorded deeds do not create ownership where the underlying right never existed.

E. The Present-Day Assertion of Ownership by World Properties, Inc.

15. World Properties, Inc. and associated entities now claim ownership and development rights over approximately 760 acres of land in Pleasant Valley / Washoe Valley.
16. These claims rest entirely on the same broken chain of title originating with Winters’ unlawful seizure and the State’s subsequent failure to correct it.
17. The asserted right to develop the land therefore constitutes:
 - An ongoing trespass upon unextinguished Aboriginal Title;
 - A continuation of historical dispossession;
 - An imminent threat of irreparable harm to burial grounds, water systems, and contaminated lands.

F. Why This Defect Is Actionable Today

18. The broken chain of title is not a historical abstraction—it is being **actively relied upon today** to justify grading, excavation, construction, and sale.
 19. Each attempt to develop, permit, or transfer the land constitutes a **new and continuing violation**, resetting any limitations clock and triggering immediate equitable jurisdiction.
 20. The defect is therefore **present-day, ongoing, and ripe for judicial review**, particularly where:
 - Sacred burial grounds are threatened;
 - Superfund-contaminated soils risk disturbance;
 - Federal and state consultation statutes were ignored;
 - Irreparable harm would occur absent intervention.
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G. Connection to Emergency Injunctive Relief

21. Because defendants' asserted ownership rests on a void chain of title, **they lack lawful authority** to disturb the land pending adjudication.
22. Courts routinely grant Temporary Restraining Orders and Preliminary Injunctions where:
 - Title is seriously disputed;
 - Irreparable harm is imminent;
 - Monetary damages are inadequate;

- The public interest favors preservation of the status quo.

23. Here, the balance of equities overwhelmingly favors halting all development activity until the legality of the chain of title is resolved.

H. Summary

24. The present-day ownership claims of defendants arise directly from an unlawful historical taking that was never cured, never ratified, and never extinguished by treaty.

25. Defendants' reliance on recorded deeds does not confer lawful title.

26. The attempted development of these lands constitutes a present and ongoing violation of federal law, state law, and tribal sovereignty.

27. This Court has both the jurisdiction and the equitable duty to intervene immediately to prevent irreversible harm.

I. ADDITIONAL CONTINUING VIOLATIONS: ST. JAMES VILLAGE (ONGOING HARM)

28. The unlawful chain of title and failure to consult the Washoe Tribe did not end with the original Sierra Reflections approvals. Defendants **continued to rely on the same defective title** to advance, approve, and complete the **St. James Village development**, which occupies Washoe ancestral land derived from the identical unlawful origin.

29. Washoe County's approval of St. James Village—and World Properties, Inc.'s participation in and benefit from that development—constitute **concrete proof that the violations alleged herein are ongoing and contemporaneous**, not historical.

30. Purchasers of homes within St. James Village were sold property interests derived from the same broken chain of title, without disclosure of the underlying

Aboriginal Title defect, lack of treaty, Superfund contamination risks, or failure of Tribal consultation.

31. These purchasers are **Purchasers in Good Faith** and are therefore members of the **Protected Homeowner and Commercial Property Owner Class**, entitled to protection—not displacement—under this action.

32. The remaining approximately **224 acres of undeveloped land associated with the St. James Village holdings** remain vacant, unremediated, and subject to the same legal defects, cultural protections, and environmental risks as the Sierra Reflections parcel.

33. Defendants’ continued assertion of ownership and development rights over these lands—after St. James Village was constructed—demonstrates a **pattern of willful continuation**, confirming that equitable relief is necessary to prevent further harm.

34. The Court’s intervention is therefore required not only to prevent future violations but to **halt an ongoing course of conduct** that has already resulted in the sale of properties encumbered by defective title and legal infirmities.

The St. James Village development confirms that Defendants’ reliance on an unlawful chain of title is active, continuing, and capable of repetition absent judicial intervention.

V. EMERGENCY INJUNCTIVE RELIEF (TRO AND PRELIMINARY INJUNCTION)

A. Legal Standard for Temporary Restraining Order and Preliminary Injunction

Plaintiffs seek emergency injunctive relief pursuant to Federal Rule of Civil Procedure 65. A Temporary Restraining Order (“TRO”) and Preliminary Injunction are warranted where the movant demonstrates:

- 1. A likelihood of success on the merits;**

2. A likelihood of irreparable harm in the absence of immediate relief;
3. That the balance of equities tips in the movant's favor; and
4. That an injunction is in the public interest.

Winter v. Natural Resources Defense Council, Inc., 555 U.S. 7, 20 (2008).

Where constitutional rights, federal statutory protections, tribal sovereignty, environmental contamination, and human remains are implicated, courts consistently recognize that irreparable harm is presumed and that preservation of the status quo ante is required pending full adjudication. See *Sundance v. Reno*, 581 F.3d 1079 (9th Cir. 2009).

B. Likelihood of Success on the Merits

Plaintiffs have demonstrated a strong likelihood of success on the merits based on:

1. Unextinguished Aboriginal Title under the Non-Intercourse Act (25 U.S.C. § 177), where no ratified treaty exists ceding Washoe Valley lands;
2. Void Chain of Title, originating in forcible removal at gunpoint in the mid-1800s by Theodore Winters and others acting without lawful authority;
3. Ongoing statutory violations, including but not limited to:
 - NRS 383 (Native burial protection; criminal penalties);
 - NAGPRA (25 U.S.C. §§ 3001–3013);
 - ARPA (16 U.S.C. §§ 470aa–mm);

- NEPA (42 U.S.C. § 4321 et seq.);
 - CERCLA (42 U.S.C. § 9601 et seq.);
4. **Failure of mandatory government-to-government consultation under Nevada SB 286 (2025);**
 5. **Continuing violations, evidenced by Washoe County and World Properties Inc.'s approval and construction of St. James Village, which proceeded on the same broken title and ancestral Washoe land.**

Because these violations are ongoing and cumulative, Defendants cannot rely on laches or statute of limitations defenses. The harm continues into the present.

C. Immediate and Irreparable Harm

Absent immediate court intervention, Plaintiffs and the Washoe Tribe face irreparable harm that cannot be remedied by monetary damages, including:

1. **Permanent destruction of Native burial grounds, including known dune burial areas within Washoe Lake State Park, which the State has refused to fence or protect despite formal Tribal requests;**
2. **Disturbance of mercury-contaminated soils within the Carson River Superfund Site (designated 1990), risking irreversible contamination of groundwater, Steamboat Creek, the Truckee River, and Pyramid Lake;**
3. **Loss of cultural and spiritual resources, which courts universally recognize as irreparable;**

- 4. Foreclosure of meaningful judicial review, because once ground disturbance occurs, the harm is complete;**
- 5. Escalation of risk following public disclosure, including grave looting and vandalism of known burial areas.**

Courts have repeatedly held that the destruction of cultural resources, sacred sites, and environmental integrity constitutes irreparable harm per se.

See *Quechan Tribe of the Fort Yuma Indian Reservation v. U.S. Dep't of Interior*, 755 F. Supp. 2d 1104 (S.D. Cal. 2010).

D. Balance of Equities

The balance of equities overwhelmingly favors Plaintiffs:

- Plaintiffs seek preservation, not profit;**
- Defendants face only a temporary pause in speculative development;**
- Plaintiffs face permanent loss of human remains, ancestral land, water safety, and public health.**

A billionaire foreign-funded developer delaying construction does not outweigh the irreversible destruction of sacred land and public resources.

E. Public Interest

The requested injunction serves the public interest by:

- Enforcing federal and state laws protecting burial sites;**

- **Upholding tribal sovereignty and constitutional principles;**
- **Preventing further Superfund contamination;**
- **Protecting drinking water and downstream Tribal fisheries;**
- **Preserving public trust lands pending lawful adjudication.**

Courts consistently hold that the public interest is served by enforcing environmental and cultural protection statutes.

See *Sierra Club v. Marsh*, 872 F.2d 497 (1st Cir. 1989).

F. Emergency Circumstances – January 6, 2026 Planning Commission Hearing

Emergency relief is required because Washoe County has scheduled a Planning Commission hearing on January 6, 2026, at 6:00 p.m., at which further approvals, extensions, or authorizations related to the Sierra Reflections project may occur.

Proceeding with this hearing:

- **Risks unlawful authorization of further ground disturbance;**
- **Perpetuates statutory and constitutional violations;**
- **Prejudices Plaintiffs’ rights before judicial review can occur.**

Accordingly, the Court’s immediate intervention is necessary to preserve jurisdiction and prevent mootness.

G. Scope of Requested Injunction

Plaintiffs respectfully request that the Court issue an immediate TRO and Preliminary Injunction that:

- 1. Halts all construction, grading, permitting, and land disturbance on:**
 - **Sierra Reflections;**
 - **St. James Village remaining open acreage (~224 acres);**
- 2. Stays and enjoins the January 6, 2026 Planning Commission meeting insofar as it relates to the subject properties;**
- 3. Extends injunctive protection to all state parks within the affected zip codes, including Washoe Lake State Park;**
- 4. Closes and secures known burial dune areas, prohibiting public access, off-road vehicles, horseback riding, and foot traffic;**
- 5. Orders enhanced law-enforcement monitoring to prevent grave tampering or looting;**
- 6. Maintains the status quo ante pending full adjudication on the merits.**

H. No Bond Required

Plaintiffs request waiver of any bond requirement under Rule 65(c), as this action is brought in the public interest to protect constitutional rights, human remains, environmental safety, and tribal sovereignty.

See *Barahona-Gomez v. Reno*, 167 F.3d 1228 (9th Cir. 1999).

For these reasons, Plaintiffs respectfully request that this Court grant immediate emergency injunctive relief.

VI. INCORPORATION OF PUBLIC PETITION AND COMMUNITY DEMANDS

Plaintiffs hereby incorporate by reference the official public petition entitled:

**“Protect Washoe / Pleasant Valley — Stop the Sierra Reflections Development”
(the “Petition”).**

The Petition reflects the unified concerns and demands of residents, property owners, coalition members, and allied tribal and environmental advocates regarding ongoing and proposed development within Washoe Valley and Pleasant Valley, including but not limited to the Sierra Reflections and St. James Village projects.

A. Scope and Status of the Petition

As of the filing of this Complaint, the Petition has been signed by hundreds of individuals, with signatures continuing to be collected and verified. Plaintiffs affirm that the Petition remains active and open, and that additional signatories are in the process of being migrated to a certified petition platform maintained by the Coalition.

Plaintiffs expressly reserve the right to submit:

- **updated signature counts,**
- **certified signature records,**
- **and supplemental petition materials during discovery, certification, or amendment of this action.**

B. Community Standing and Public Interest

The Petition evidences substantial public concern regarding:

- 1. The disturbance of Native burial grounds and sacred sites;**
- 2. Development on lands within or adjacent to the Carson River Mercury Superfund Site;**
- 3. Threats to groundwater, surface water, and downstream tribal waters;**
- 4. The continued approval of development without required Tribal consultation;**
- 5. The failure of governmental entities to protect cultural, environmental, and public health interests.**

The Petition further demonstrates that this action is not brought for private gain, but rather in the public interest, to prevent irreparable harm and to enforce compliance with federal, state, and tribal law.

C. Alignment With Relief Sought

The relief requested in this action is fully congruent with the Petition's demands. This lawsuit serves as the judicial mechanism through which the community's lawful requests for protection, preservation, and accountability may be adjudicated.

Plaintiffs emphasize that the Petition does not seek eviction of current homeowners or seizure of occupied homesteads. Rather, it supports conservation, preservation, and the protection of residents who purchased property in good faith.

D. Reservation of Rights

Plaintiffs expressly reserve the right to:

- **amend this Complaint to include additional petitioners;**
- **identify and name individual members of the protected classes;**
- **submit the Petition and related materials as exhibits;**
- **and rely upon the Petition to support standing, irreparable harm, and the public interest prong of injunctive relief.**

The Petition is incorporated for all purposes consistent with federal pleading standards and equitable relief doctrine.

VII. VISION FOR POST-RECLAMATION LAND USE AND STEWARDSHIP

Plaintiffs seek not monetary enrichment, but Equitable Relief grounded in conservation, restoration, and justice.

Upon reclamation and return of ancestral lands, Plaintiffs request that the Court recognize and order the following land-use framework:

- 1. 100% Conservation and Preservation Stewardship**
All reclaimed lands shall be permanently preserved for conservation purposes, free from residential, commercial, industrial, or extractive development.
- 2. Tribal Stewardship and Management**
Stewardship authority shall vest in the Washoe Tribe of Nevada and California, consistent with their aboriginal title, cultural expertise, and historical role as land and water stewards.
- 3. Reforestation and Ecological Restoration**
Lands historically clear-cut for mining and logging shall be reforested with native species, including long-pine and associated ecosystems, to

restore watershed stability, wildlife habitat, and fire resilience.

4. Protection of Open and Pasture Lands

All open lands and pasture areas not part of an existing lawful homestead—including large grazing tracts in Washoe and Pleasant Valleys—shall be incorporated into the conservation estate and removed from speculative or commercial exploitation.

5. Transfer of State Parks within Affected Zip Codes

All state park lands within the subject zip codes, including Washoe Lake State Park, shall be transferred to Tribal stewardship due to the State’s documented failure to protect burial grounds and cultural resources.

6. Permanent Protection of Burial Grounds

Known and suspected burial areas, including dune systems, shall be permanently closed to public access and protected through fencing, monitoring, and law-enforcement oversight.

This vision reflects restorative justice, public safety, environmental necessity, and compliance with federal and state law.

VII. PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that this Court enter judgment in their favor and grant the following relief:

A. Immediate Emergency Relief (TRO / Preliminary Injunction / Status Quo)

- 1. Issue an immediate Temporary Restraining Order (“TRO”) and Preliminary Injunction under Fed. R. Civ. P. 65, restraining and enjoining Defendants, and all persons acting in concert with them, from**

any ground-disturbing activity, grading, excavation, drilling, trenching, roadwork, surveying, staking, clearing, demolition, or other physical disturbance on or affecting the Sierra Reflections site and associated parcels identified in this filing, including any related “St. James” remaining undeveloped acreage, until further order of the Court.

- 2. Maintain the Status Quo Ante to preserve evidence and prevent irreparable harm to (i) cultural resources, (ii) burial sites, (iii) environmental and hydrological conditions, and (iv) the Court’s ability to provide meaningful relief.**
- 3. Stay or enjoin any county-level hearings, approvals, permits, extensions, or administrative actions scheduled or anticipated to further the Sierra Reflections development—including the January 6, 2026 Planning Commission meeting—to prevent mootness of the Court’s jurisdiction and to avoid irreparable harm pending adjudication.**
- 4. Order expedited relief and an accelerated briefing schedule, including an Order to Show Cause if the Court deems appropriate, given the time-sensitive risk of irreversible harm.**

B. Declaratory Relief: Voidness, Broken Chain of Title, and Unlawful Process

- 5. Enter Declaratory Judgment that any deeds and asserted interests arising from the alleged broken/defective chain of title and/or alleged unlawful takings described in the Complaint are void and/or voidable, including as alleged due to absence of lawful sovereign transfer and alleged fraud, duress, and concealment.**
- 6. Enter Declaratory Judgment that Defendants’ land-use approvals, planning actions, and permitting processes are procedurally defective and unlawful as alleged, including for failure to conduct legally required review and consultation concerning cultural resources, burial grounds, and other protected interests.**

C. Cultural Resources, Burial Grounds, and Protective Orders

- 7. Enter an Order requiring immediate protective measures for any known or suspected burial grounds and cultural resource areas implicated by this action, including:
 - a. Buffer zones, fencing, signage, and access restrictions around sensitive areas, including within Washoe Lake State Park dune areas identified in Plaintiffs' allegations;**
 - b. A no-entry / no-disturbance directive pending resolution of this case; and**
 - c. A requirement that Defendants preserve all relevant records and locations, with strict evidence preservation obligations.****

- 8. Order enhanced security and monitoring (through appropriate federal, state, and/or local mechanisms) for sensitive cultural areas during the pendency of this action to deter trespass, vandalism, looting, and tampering, particularly in light of the public nature of the allegations raised.**

D. Independent Study, Production of Records, and Preservation of Evidence

- 9. Order that any cultural resource, archaeological, environmental, and hydrological assessments relevant to the disputed areas be conducted (or re-conducted) only through independent, professionally competent experts, and with appropriate consultation protocols as applicable.**

- 10. Order expedited production of responsive public records and relevant internal communications identified by Plaintiffs as necessary to prevent spoliation and irreparable harm, including but not limited to records concerning baseline surveys, cost estimates, and historical communications that bear on consultation, permitting, and development planning.**

E. Remedy of Title for Protected Classes (Homeowners and Commercial Owners)

11. Enter an Order providing a clear and practical remedy of title for homeowners and commercial property owners within the affected zip codes (including those alleged to be “Purchasers in Good Faith”), including:

- a. A court-supervised process to clarify, quiet, and/or insure title to developed residential and commercial parcels so that innocent owners are not punished for alleged historic defects;**
- b. A declaration that Plaintiffs are not seeking eviction or seizure of developed homes (the “Mercy Clause”); and**
- c. Such other equitable measures as the Court deems just to protect innocent owners while the underlying dispute is adjudicated.**

12. To prevent unnecessary harm to innocent owners and the local economy, Plaintiffs request that the Court not freeze ordinary arm’s-length sales of developed homes, but instead:

- a. Encourage (not compel) good-faith sellers to provide the Washoe Tribe a meaningful opportunity to make an offer before listing, when feasible; and**
- b. Require that any transaction involving disputed title issues proceed only with appropriate notice and court-supervised safeguards as the Court deems necessary to protect the protected classes from further injury.**

13. Plaintiffs further request that the Court reserve authority to review or condition sales only to the extent necessary to prevent ongoing fraud, concealment, or laundering of allegedly clouded titles—while avoiding undue restraint on innocent owners.

F. Sovereign Restoration, Stewardship, and Conservation Relief

14. Enter equitable relief consistent with Plaintiffs' allegations seeking restoration of stewardship and conservation protection for disputed undeveloped lands, including:

- a. Permanent conservation status for the disputed undeveloped acreage;**
- b. Reforestation and ecological restoration plans consistent with Plaintiffs' stated conservation objectives; and**
- c. A judicial framework that recognizes the Washoe Tribe's asserted sovereign interests in stewardship and protection of cultural and environmental resources, to the extent proven.**

15. Order that state parks and open-space holdings within the identified affected area, including Washoe Lake State Park and other relevant parks, be subject to court-ordered protective management measures during litigation to prevent further alleged harm to burial grounds and cultural resources.

16.

G. Monetary Relief, Restitution, and Court-Determined Just Compensation

16. Award restitution, disgorgement, and/or damages against liable Defendants in an amount to be proven at trial, including but not limited to:

- a. Restitution tied to alleged improper taxation, title fraud impacts, and out-of-pocket losses borne by the protected classes;**
- b. Damages for alleged loss of use and enjoyment, property value impacts, and associated harms; and**
- c. Any additional damages supported by the evidence and permitted by law.**

17. Award punitive damages, where permitted, in an amount sufficient to punish and deter alleged willful, malicious, and reckless misconduct, with any allocation of punitive or cy pres-style proceeds to be approved and structured by the Court in the interests of justice.

(Plaintiffs propose, subject to Court approval, a restorative allocation framework prioritizing the Washoe Tribe and impacted owner classes, and a limited portion for conservation stewardship administration through SSR4GC or an appropriate fiduciary vehicle.)

18. Award reasonable costs and any allowable attorneys' fees (if and where authorized), plus pre- and post-judgment interest as permitted by law.

H. Asset Preservation (Narrowed to Civil-Appropriate Relief)

19. To prevent dissipation of assets and frustration of judgment, Plaintiffs request targeted asset preservation relief narrowly tailored to this case, including restraining transfers of development-related assets, property interests, and material records, consistent with due process and applicable law.

(Note: requests involving passports, extradition, or criminal custody are typically not relief a civil judge grants in a complaint like this; those issues are generally handled by criminal authorities. If you want the "criminal element" flagged in the filing, the safer move is a referral/request for agency review—see the next paragraph.)

I. Referral / Notice to Appropriate Authorities

20. Because Plaintiffs allege conduct that may implicate criminal statutes and federal regulatory concerns, Plaintiffs request that the Court direct the Clerk to transmit a copy of the Complaint and any injunctive Order to appropriate agencies for review as the Court deems proper, including agencies with jurisdiction over cultural resource protection, environmental protection, and foreign investment/national security review.

J. Reservation of Rights and Leave to Amend

21. Plaintiffs request an Order recognizing that this is an initial filing and that Plaintiffs reserve the right to identify and name additional members of the protected classes, and to add additional defendants and Doe entities as discovery reveals their identities and roles, without prejudicing the claims of existing Plaintiffs.

22. Plaintiffs request leave to amend as justice requires under Fed. R. Civ. P. 15, including to add additional class members, refine class definitions, and incorporate additional documentary support (including petition certification materials and sworn declarations/affidavits) as they become available.

K. That the Court award Plaintiffs the costs of this action, including reasonable attorneys' fees and other litigation expenses incurred, as permitted by applicable law.

L. Other and Further Relief

23. Grant such other and further relief as this Court deems just and proper.

VIII. SEVERABILITY AND PRESERVATION OF CLAIMS

A. Severability of Claims, Parties, and Remedies

If any provision, allegation, claim, cause of action, theory of liability, class definition, remedy, or requested relief set forth in this Complaint is held to be invalid, unlawful, unenforceable, or otherwise defective by this Court or any appellate court, such determination shall not affect, impair, or invalidate the remaining provisions, claims, parties, classes, or remedies, all of which shall remain in full force and effect to the maximum extent permitted by law.

This Complaint is expressly intended to be severable as to:

- 1. Individual claims and legal theories;**
- 2. Individual defendants or groups of defendants;**
- 3. Individual plaintiffs or protected classes; and**
- 4. Individual forms of relief, whether legal or equitable.**

B. Severability as to Defendants

The dismissal, settlement, immunity, bankruptcy, cooperation, realignment, or change in legal posture of any defendant, including but not limited to any Defendant becoming a cooperating party or aligning with Plaintiffs' position, shall not impair or prejudice:

- Plaintiffs' claims against any remaining defendants;**
- Plaintiffs' entitlement to injunctive, declaratory, or equitable relief; or**
- Plaintiffs' right to pursue damages, restitution, or other remedies against any remaining defendant.**

Liability is pleaded jointly and severally where applicable, and each defendant is independently responsible for their own acts, omissions, and participation in the alleged conduct.

C. Severability as to Plaintiffs and Protected Classes

The removal, exclusion, withdrawal, disqualification, settlement, or reclassification of any individual plaintiff or class member shall not:

- Defeat jurisdiction;**

- **Destroy standing;**
- **Extinguish the claims of remaining plaintiffs or protected classes; or**
- **Affect the Court's authority to grant relief on behalf of remaining protected persons.**

Plaintiffs expressly reserve the right to add, substitute, or refine class membership through amendment, certification, or subsequent proceedings without prejudice to the existing claims asserted herein.

D. Preservation of Coalition, Class, and Pro Se Standing

This action is not dependent upon:

- **Continuous membership in the Coalition by every protected person;**
- **Universal participation by all affected property owners; or**
- **Final class certification at the time of filing.**

Accordingly, the failure, refusal, or delay of any individual or entity to formally join the Coalition or the action shall not impair the claims asserted, nor shall it serve as a defense to Defendants' alleged conduct.

E. Severability as to Remedies

If the Court determines that any specific remedy requested herein is unavailable, excessive, premature, or otherwise improper, Plaintiffs respectfully request that the Court:

- **Grant all remaining remedies supported by law and equity; and**
- **Tailor relief narrowly rather than dismissing claims wholesale.**

Plaintiffs expressly plead alternative and cumulative remedies, including declaratory, injunctive, equitable, restitutionary, and monetary relief, any one or more of which may be awarded independently.

F. Intent of the Parties

It is the express intent of Plaintiffs that this Complaint be liberally construed and preserved in maximum scope, consistent with the remedial purposes of the laws invoked and the Court’s equitable powers.

CONCLUSION AND RESERVATION OF RIGHTS

For the foregoing reasons, Plaintiffs respectfully request that this Court grant all relief sought herein, including declaratory relief, injunctive relief, equitable restitution, and such further relief as the Court deems just and proper.

Plaintiffs bring this action in good faith to prevent irreparable harm to sovereign tribal interests, protected classes, public health, environmental integrity, and national security, and to preserve the status quo pending full adjudication on the merits.

Nothing in this filing shall be construed as a waiver of Plaintiffs’ right to amend this Complaint to add additional plaintiffs, class members, defendants, causes of action, or claims for damages as discovery proceeds and as further facts become known. Plaintiffs expressly reserve all rights under applicable federal and state law.

VERIFICATION

I, Jeannette Porrazzo, declare under penalty of perjury under the laws of the United States that the factual statements contained in this Complaint are true and correct to the best of my knowledge, information, and belief.

Executed on this ___ day of _____, 2026, at _____.

Jeannette “Jette” Porrazzo

**Plaintiff, Pro Se
Executive Director, Stop Sierra Reflections for Good Coalition (SSR4GC)**

RESPECTFULLY SUBMITTED

**Jeannette “Jette” Porrazzo
Plaintiff, Pro Se
Stop Sierra Reflections for Good Coalition (SSR4GC)
Washoe Valley, NV 89704
Phone: 615-710-9382
Email: ssr4gc@gmail.com**

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RENO DIVISION

**JEANNETTE PORRAZZO, et al.,
Plaintiffs,**

v.

**WORLD PROPERTIES, INC., et al.,
Defendants.**

Case No.: _____

**PROPOSED ORDER GRANTING TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTIVE RELIEF**

**Upon consideration of the Plaintiffs’ Complaint for Declaratory and
Injunctive Relief, including the embedded request for emergency injunctive
relief pursuant to Federal Rule of Civil Procedure 65; the Court having
jurisdiction over the parties and subject matter; and the Court finding that
immediate action is necessary to preserve the status quo and prevent
irreparable harm,**

IT IS HEREBY ORDERED:

1. IMMEDIATE HALT TO DEVELOPMENT ACTIVITY

All Defendants, their agents, employees, contractors, successors, assigns, and all persons acting in concert with them are IMMEDIATELY RESTRAINED AND ENJOINED from engaging in any grading, excavation, construction, land disturbance, infrastructure installation, permitting activity, or preparatory development activity on any parcels associated with:

- **the Sierra Reflections project; and**
- **the remaining undeveloped acreage of the St. James Village holdings,**

pending further order of this Court.

2. STAY OF GOVERNMENTAL APPROVALS AND HEARINGS

All governmental entities, including Washoe County and its Planning Commission, are TEMPORARILY ENJOINED from conducting, approving, extending, ratifying, or acting upon any hearings, permits, maps, approvals, or administrative actions relating to the Sierra Reflections project or associated parcels.

This injunction expressly includes the January 6, 2026 Planning Commission meeting, which is hereby STAYED pending further order of the Court.

3. PROTECTION OF TRIBAL BURIAL GROUNDS AND CULTURAL SITES

All Defendants and governmental entities are ORDERED to refrain from any activity that may disturb, expose, alter, or impact known or suspected Native American burial grounds, sacred sites, dunes, or culturally sensitive areas located within:

- **Washoe Valley,**

- **Pleasant Valley, and**
- **all parcels comprising or associated with the Sierra Reflections and St. James Village sites,**

pending further order of the Court.

4. TEMPORARY CLOSURE OF STATE PARK LANDS

In order to prevent irreparable harm, desecration, looting, or disturbance of known burial grounds, the Court ORDERS the temporary closure to the general public of all affected areas within:

- **Washoe Lake State Park; and**
- **any other state park lands located within the affected zip codes identified in the Complaint,**

to the extent necessary to protect burial dunes, culturally sensitive areas, and adjacent landforms, pending implementation of appropriate protective fencing and access controls.

5. RESTRICTION OF ACCESS TO DUNE AND BURIAL AREAS (PUBLIC AND PRIVATE LANDS)

All horseback riding, off-road vehicle use, mountain biking, hiking, excavation, surveying, or other physical access to dune areas and known or suspected burial locations is TEMPORARILY PROHIBITED, including on:

- **state park lands;**
- **privately held open spaces; and**
- **all undeveloped portions of the Sierra Reflections and St. James Village parcels,**

until such time as adequate fencing, monitoring, and protective measures are implemented under lawful authority.

6. SECURITY, MONITORING, AND CRIME PREVENTION

The Court finds that public filing of this action creates a foreseeable risk of grave robbing, looting, tampering, or unlawful disturbance of known and suspected burial grounds.

Accordingly, the Court **ORDERS** that appropriate federal, state, or local law enforcement and/or park enforcement personnel provide increased monitoring and security of:

- all known burial grounds;
- all suspected burial areas; and
- all undeveloped open spaces within the Sierra Reflections and St. James Village sites,

for the purpose of preventing vandalism, trespass, looting, excavation, or other criminal conduct during the pendency of this action.

7. PRESERVATION OF STATUS QUO AND COURT AUTHORITY

This Order is entered solely to preserve the status quo ante and prevent irreparable harm. Nothing herein shall be construed as a final adjudication on the merits.

The Court retains discretion, upon motion or sua sponte, to issue additional protective orders, including but not limited to partial sealing or access limitations, if necessary to protect cultural resources, burial locations, or public safety.

8. EFFECTIVE DATE

This Temporary Restraining Order and Preliminary Injunction shall take effect **IMMEDIATELY** upon entry and shall remain in effect until further order of this Court.

IT IS SO ORDERED.

DATED: _____

UNITED STATES DISTRICT JUDGE