

**COMMISSIONERS**  
DOUG LITTLE - Chairman  
BOB STUMP  
BOB BURNS  
TOM FORESE  
ANDY TOBIN



05484909

**PATRICIA L. BARFIELD**  
Director  
Corporations Division

**ARIZONA CORPORATION COMMISSION**

Date 04/22/2016

**VERDE RIVER ESTATES LLC**  
2077 SALT MINE ROAD  
CAMP VERDE, AZ 86332

Dear Sir or Madam:

Enclosed is a copy of the following document(s) that were served upon the Arizona Corporation Commission on 04/20/2016 as agent for VERDE RIVER ESTATES LLC :

Case caption: **DAVID MENDEZ v. DAVID MEIER, ET AL,**  
Case number: **V1300-CV2015-80381** Court: **YAVAPAI COUNTY, SUPERIOR COURT**

- ☒ Summons
- ☒ Complaint
- ☐ Subpoena
- ☐ Subpoena Duces Tecum
- ☐ Default Judgment
- ☐ Judgment
- ☐ Writ of Garnishment
- ☐ Motion For Summary Judgment
- ☐ Motion for
- ☒ Other **CERTIFICATE ON COMPULSORY ARBITRATION**

Sincerely,

A handwritten signature in black ink, appearing to read "Lynda B. Griffin", written over a horizontal line.  
**Lynda B. Griffin**  
Custodian of Records

Initials **GM**  
File number **L-1030006-6**



**COMMISSIONERS**  
DOUG LITTLE – Chairman  
BOB STUMP  
BOB BURNS  
TOM FORESE  
ANDY TOBIN



**JODI JERICH**  
Executive Director

**PATRICIA L. BARFIELD**  
Director  
Corporations Division

**ARIZONA CORPORATION COMMISSION**

**CERTIFICATE OF MAILING**

The undersigned person certifies the following facts:

On **04/20/2016**, **GEORGE MOYA**, an employee of the Arizona Corporation Commission ("ACC"), received on behalf of the ACC service of the following documents upon the ACC as agent for **VERDE RIVER ESTATES LLC**

Case caption: **DAVID MENDEZ v. DAVID MEIER, ET AL**  
Case number: **V1300-CV2015-80381**  
Court: **YAVAPAI COUNTY, SUPERIOR COURT**

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> Summons  | <input type="checkbox"/> Default Judgment    |
| <input checked="" type="checkbox"/> Complaint  | <input type="checkbox"/> Judgment            |
| <input type="checkbox"/> Subpoena  | <input type="checkbox"/> Writ of Garnishment |
| <input type="checkbox"/> Subpoena Duces Tecum  |  |
| <input type="checkbox"/> Motion For Summary Judgment                                   |  |
| <input type="checkbox"/> Motion for  |  |
| <input checked="" type="checkbox"/> Other <b>CERTIFICATE ON COMPULSORY ARBITRATION</b> |  |

On **04/22/2016**, the undersigned person placed a copy of the above listed documents in the United States Mail, postage prepaid, addressed to the entity at its last known place of business address, as follows:

**VERDE RIVER ESTATES LLC**  
**2077 SALT MINE ROAD**  
**CAMP VERDE, AZ 86332**

**OR**

The undersigned was unable to mail the above listed documents to

because that entity is not a registered corporation or limited liability company in the State of Arizona, and the Arizona Corporation Commission has no record of its known place of business.

I declare and certify under penalty of perjury that the foregoing is true and correct.

Printed name: **GEORGE MOYA**

Date: **04/22/2016**

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



FILE

1 Law Offices of Gonzales & Poirier, P.L.L.C.  
2 223 N. San Francisco St. Ste. 200-B  
3 Flagstaff, AZ 86001  
4 Phone: (928) 774-5400  
5 Fax: (928) 268-3425  
6 [tony@tgattorney.com](mailto:tony@tgattorney.com)  
7 Tony Gonzales #023660  
8 Attorney for Plaintiff

9  
10 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

11 IN AND FOR THE COUNTY OF YAVAPAI

12 DAVID MENDEZ, an unmarried man,  
13  
14 Plaintiff,

15 vs.

16 DAVID MEIER, an unmarried man, dba  
17 VERDE RIVER ESTATES, L.L.C., an  
18 Arizona limited liability company; JOHN  
19 DOE SMITH and JANE DOE SMITH,  
20 husband and wife, WHITE  
21 PARTNERSHIPS I-X; RED LIMITED  
22 LIABILITY COMPANIES I-X; and  
BLACK CORPORATIONS I-X,

Defendants.

VB02V 201580381  
Case No. \_\_\_\_\_

SUMMONS

THE STATE OF ARIZONA TO DEFENDANTS:

DAVID MEIER  
VERDE RIVER ESTATES, L.L.C.

2177 Saltmine Road  
Camp Verde, AZ 86322

YOU ARE HEREBY SUMMONED and required to appear and defend against the  
Complaint, within the time applicable, in the above-entitled action in this Court. If served within  
Arizona, you shall appear and defend within 20 days after the service of this Summons and



1 Complaint upon you, exclusive of the day of service. If served out of the State of Arizona –  
2 whether by direct service, by registered or certified mail, or by publication – you shall appear  
3 and defend with 30 days after the service of the Summons and Complaint upon you is complete,  
4 exclusive of the day of service. Where process is served upon the Arizona Director of Insurance  
5 as an insurer's attorney to receive service of legal process against it in this state, the insurer shall  
6 not be required to appear, answer or plead until the expiration of 40 days after date of such  
7 service upon the Director. Service by registered or certified mail outside the State of Arizona is  
8 complete on the date of receipt by the party being served. Service by publication is complete 30  
9 days after the date of first publication. Direct service is complete when made. Service upon the  
10 Arizona Motor Vehicle Superintendent is complete 30 days after filing the Affidavit of  
11 Compliance and return receipt or Officer's Return. Arizona Rules of Civil Procedure, Rule 4;  
12 A.R.S. §§ 20-222, 28-502 and 28-503.

13 **YOU ARE HEREBY NOTIFIED** that in case of your failure to appear and defend  
14 within the time applicable, judgment by default may be rendered against you for the relief  
15 demanded in the Complaint.

16 **YOU ARE CAUTIONED** that in order to appear and defend, you must file an Answer  
17 or proper response in writing with the Clerk of this Court, accompanied by the necessary filing  
18 fee, within the time required, and you are required to serve a copy of an Answer or response  
19 upon the attorney for the Plaintiff, David Mendez. Arizona Rules of Civil Procedure, Rules 5  
20 and 10(d); A.R.S. § 12-311.  
21  
22



1 The name and address of the attorney for the Plaintiff is:

2 Law Offices of Gonzales & Poirier, PLLC  
3 223 N. San Francisco St. Ste. 200-B  
4 Flagstaff, AZ 86001  
(928) 774-5400

5 Requests for reasonable accommodation for persons with disabilities must be made to the  
6 division assigned to the case by the parties at least three (3) judicial days in advance of a  
7 scheduled court proceeding.

8 Given under my hand and seal of the Superior Court of the State of Arizona in and for the  
9 County of YAVAPAI this \_\_\_\_ day of DEC 15 2015, 2015.

10 DONNA McQUAILTY

11 N. Gonzales

12 By \_\_\_\_\_  
13 Deputy Clerk  
14  
15  
16  
17  
18  
19  
20  
21  
22



ORIGINAL FILED THIS 2015  
DAY OF  
DONNA McQUALITY  
Clerk of Superior Court  
By: N. Gentile  
Deputy

1 Law Offices of Gonzales & Poirier, P.L.L.C.  
2 223 N. San Francisco St. Ste. 200-B  
3 Flagstaff, AZ 86001  
4 Phone: (928) 774-5400  
5 Fax: (928) 268-3425  
6 tony@tgattorney.com  
7 Tony Gonzales #023660  
8 Attorney for Plaintiff

9  
10 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
11  
12 IN AND FOR THE COUNTY OF YAVAPAI

13 DAVID MENDEZ, an unmarried man,  
14  
15 Plaintiff

16 vs.

17 DAVID MEIER, an unmarried man, dba  
18 VERDE RIVER ESTATES, L.L.C., an  
19 Arizona limited liability company; JOHN  
20 DOE SMITH and JANE DOE SMITH,  
21 husband and wife, WHITE  
22 PARTNERSHIPS I-X; RED LIMITED  
LIABILITY COMPANIES I-X; and  
BLACK CORPORATIONS I-X,

Defendants.


V1300CV 201580381  
Case No.

CERTIFICATE ON  
COMPULSORY ARBITRATION

Plaintiff, by and through their attorney undersigned, certify that they knows the dollar limits and other limitations set forth by the Local Rules of this Superior Court, and further certify that this case IS NOT subject to compulsory arbitration, as proved by Rules 72 through 76 of the Arizona Rules of Civil Procedure.

RESPECTFULLY SUBMITTED this 15<sup>th</sup> day of December, 2015.

LAW OFFICES OF GONZALES & POIRIER, PLLC

  
Tony Gonzales, Attorney for Plaintiff



COPY  
ORIGINAL FILED 12/15/15  
LAY OF  
DONNA McQUALITY  
Clerk of Superior Court  
By: N. Gentile  
Deputy

1 Law Offices of Gonzales & Poirier, P.L.L.C.  
2 223 N. San Francisco St. Ste. 200-B  
3 Flagstaff, AZ 86001  
4 Phone: (928) 774-5400  
5 Fax: (928) 268-3425  
6 [tony@tgattorney.com](mailto:tony@tgattorney.com)  
7 Tony Gonzales #023660  
8 Attorney for Plaintiff

9  
10 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
11  
12 IN AND FOR THE COUNTY OF YAVAPAI

13 DAVID MENDEZ, an unmarried man,

14 Plaintiff,

15 vs.

16 DAVID MEIER, an unmarried man, dba  
17 VERDE RIVER ESTATES, L.L.C., an  
18 Arizona limited liability company; JOHN  
19 DOE SMITH and JANE DOE SMITH,  
20 husband and wife, WHITE  
21 PARTNERSHIPS I-X; RED LIMITED  
22 LIABILITY COMPANIES I-X; and  
BLACK CORPORATIONS I-X,

Defendants.

V B00CV 201580881

Case No. \_\_\_\_\_

COMPLAINT

(Tort-Premise Liability)

COMES NOW, Plaintiff, by and through his undersigned attorney, and for his Complaint  
against Defendant named herein, alleges as follows:

I

Plaintiff, David Mendez, is a resident of Yavapai County, Arizona.

Defendant, David Meier dba Verde River Estates, L.L.C. is believed to be a resident and  
doing business in Yavapai County, Arizona.



1 Defendants, John Doe Smith and Jane Doe Smith, White Partnerships I-X, Red Limited  
2 Liability Companies I-X, and Black Corporations I-X are fictitious Defendants, whose true  
3 names or capacities, whether individual, corporate, associate or otherwise, are unknown to  
4 Plaintiff at this time and Plaintiff therefore sues said Defendants by such fictitious names and  
5 will ask for leave of this Court to amend this Complaint to show their true name and capacities  
6 when the same has been ascertained.

## 7 II

8 The acts complained of all took place in Camp Verde, Arizona, in Yavapai County. This  
9 Court has jurisdiction over this action.

## 10 III

11 Venue is proper in Yavapai County pursuant to A.R.S. § 12-401(10), as the accident  
12 occurred in Yavapai County.

## 13 IV

14 On or about December 16, 2013, at approximately 12:30 p.m., in Yavapai County,  
15 Arizona, Defendant hired Plaintiff to work on his nut ranch on Saltmine Road in Camp Verde,  
16 Arizona (the "Property"). Plaintiff was instructed by Defendant and/or his agent to drive a  
17 backhoe tractor. As Plaintiff drove the tractor down the road, the brakes would not work,  
18 causing Plaintiff to lose control and crash the tractor, which turned over on top of Plaintiff  
causing serious injuries.

19 At the time of crash and before Plaintiff was instructed to drive the tractor, Defendant  
20 knew or had reasons to know that the brakes to the tractor were not working properly. Plaintiff  
21 was never told Plaintiff that the brakes to the tractor were not working properly.  
22



1 Plaintiff suffered a broken pelvis and other internal and external injuries. As a result of  
2 these injuries, Plaintiff required surgery. Thereafter, Plaintiff was unable to go back to work,  
3 incurred medical expenses, pain and suffering, and emotional distress.

4 At the time of the accident, Plaintiff was acting in a reasonable and prudent manner while  
5 working on the Property and for Defendant. The type of work that Plaintiff was asked to assist  
6 with was an abnormally dangerous activity. Defendant failed to provide proper supervision of  
7 Plaintiff and failed to warn Plaintiff about the faulty brakes. Moreover, Defendant failed to  
8 provide properly working equipment, safe conditions, and failed to properly train and/or provide  
9 proper safety methods, techniques or procedures for operating the tractor.

10 V

11 As a direct and proximate result of Defendant's negligence, Plaintiff sustained physical  
12 injuries, pain and suffering, emotional distress, along with incurring medical expenses and lost  
13 wages.

14 VI

15 As a direct and proximate result of Defendant's negligence supervision, Plaintiff  
16 sustained physical injuries, pain and suffering, emotional distress, along with incurring medical  
17 expenses and lost wages.

18 VII

19 As a direct and proximate result of Defendant's failure to abide by Arizona Revised  
20 Statute § 23-403, Plaintiff sustained physical injuries, pain and suffering, emotional distress,  
21 along with incurring medical expenses and lost wages. The acts and/or omissions referred to in  
22 the preceding paragraph violated Arizona law, which was enacted for the public safety, and thus  
the action is *negligent per se*.



VIII

As a direct and proximate result of Defendant's failure to warn Plaintiff of the unsafe condition - the faulty brakes, Plaintiff sustained physical injuries, pain and suffering, emotional distress, along with incurring medical expenses and lost wages.

WHEREFORE, Plaintiff prays for judgment against Defendants for:

- a) All reasonable and necessary past and future medical expenses;
- b) All damages for actual loss of earning capacity both before and after the accident, to the end of work life expectancy; 1
- c) For reasonable damages for past and future pain, suffering and disability;
- d) For emotional distress;
- e) All costs and expenses incurred herein; and
- f) And for such further relief as may be appropriate.

RESPECTFULLY SUBMITTED this 15<sup>th</sup> day of December, 2015.

LAW OFFICES OF GONZALES & POIRIER, PLLC

  
Tony Gonzales, Attorney for Plaintiff



CORPORATIONS DIVISION  
RECORDS SECTION  
1300 West Washington  
Phoenix, Arizona 85007-2929

User Id: GMOYA  
Invoice No.: 5043090

Check Batch:  
Invoice Date: 04/20/2016  
Date Received: 04/20/2016  
Customer No.:

ATTN:  
(CASH CUSTOMER)

Quantity	Description	Amount
1	SERVICE OF PROCESS L-1030006-6 VERDE RIVER ESTATES LLC	\$25.00
Total Documents: \$		25.00
	CHECK 0845 PAYMENT	\$25.00
Balance Due: \$		0.00



Corporate Inquiry

04/20/2016

State of Arizona Public Access System

2:19 PM

File Number: L-1030006-6

Corp. Name: VERDE RIVER ESTATES LLC

Domestic Address

% DAVID L MEIER  
2077 SALT MINE RD

CAMP VERDE, AZ 86332

Second Address

Agent: ROBERT L MILLER  
Status: APPOINTED 05/10/2002  
Mailing Address:  
1050 N SAN FRANCISCO STE E

FLAGSTAFF, AZ 86001

Agent Last Updated: 06/28/2002

Business Type:

Domicile: ARIZONA

County: YAVAPAI

Corporation Type: DOMESTIC L.L.C.

Life Period: PERPETUAL

Incorporation Date: 05/10/2002

Approval Date: 05/10/2002

Last A/R Received: /

Date A/R Entered:

Next Report Due:

FLOYD BROWN



# Liddy Legal Support Services

PO Box 2007, Phoenix, AZ 85001

63 E. Pennington St., #102, Tucson, AZ 85702

2700 Woodlands Village Blvd., #300-420, Flagstaff, AZ 86001

Phoenix 602-297-0676, Tucson 520-628-2824, Flagstaff 928-225-7737

Client File # Mendez v. Meier

Account # 437

Invoice # 258815

Liddy # 181124-2

## IN THE SUPERIOR COURT OF THE STATE OF ARIZONA IN AND FOR THE COUNTY OF YAVAPAI

DAVID MENDEZ,

Plaintiff(s),

vs.

DAVID MEIER, et al.,

Defendant(s).

**AFFIDAVIT OF ATTEMPTED SERVICE  
BY PRIVATE PROCESS SERVER**  
Case No. V1300-CV2015-80381

STATE OF ARIZONA

County of Coconino

On 1/10/2016, I received a Summons, Complaint and Certificate of Compulsory Arbitration; in each instance I personally attempted to serve a copy of each document listed above on those named below in the manner and at the time and place shown, that all services were attempted within Coconino County, State of Arizona.

Upon VERDE RIVER ESTATES, LLC c/o ROBERT L. MILLER, STATUTORY AGENT at 1050 N. San Francisco St., Ste E, Flagstaff, AZ 86001; on 1/13/2016 at 3:40 pm, The address for the Statutory Agent is now occupied by Northern Arizona Healthcare. No one in the office knows who Robert L. Miller is or his current whereabouts. Documents can't be served at this address.

Received from GONZALES & POIRIER, PLLC., (TONY GONZALES #023660)

PROCESS SERVER: Carl Cartwright, CN201400004

The undersigned states: That I am a certified private process server in the county of Coconino and am an Officer of the Court.

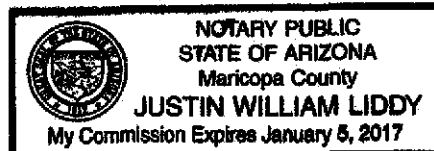
SIGNATURE OF PROCESS SERVER: *Carl Cartwright*

Date: 4/20/2016

Item	Amount
Min. Mileage	\$16.00
Affidavit/Notary	\$10.00

Subscribed and sworn before me on 4/20/2016

*Justin William Liddy*  
Justin William Liddy



Notary Public  
My Commission Expires  
January 5, 2017  
Tax ID# 90-0533870

Total \$26.00

