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**IN THE FIRST JUDICIAL DISTRICT COURT  
OF THE STATE OF NEVADA IN AND FOR CARSON CITY**

UBER SEXUAL ASSAULT SURVIVORS  
FOR LEGAL ACCOUNTABILITY and  
NEVADA JUSTICE ASSOCIATION,  
Plaintiffs,

vs.

UBER TECHNOLOGIES, INC., a  
Delaware corporation; MATT GRIFFIN,  
SCOTT GILLES, JOHN GRIFFIN, and TIA  
WHITE, individuals; "NEVADANS FOR  
FAIR RECOVERY," a registered Nevada  
political action committee; and  
FRANCISCO AGUILAR, in his official  
capacity as Secretary of State,  
Defendants.

Case No.

Dept. No.

Priority Matter Under NRS 295.061(1)

**DECLARATION OF MICHELLE J. LANSDOWN**

I, Michelle J. Lansdown, declare:

1. I am a paralegal at the GGRM Law Firm in Las Vegas. This declaration provides documents in cases from the Las Vegas Justice Court, the Eighth Judicial District Court, and the U.S. District Court for the Northern District of California, true and correct copies of which are attached.

2. **State of Nevada v. Dawed Mekonene**, Las Vegas Justice Court, Case No. 21-CR-057087: This is a criminal action filed against an Uber driver who brutally raped, sexually assaulted, and physically assaulted his sleeping Uber passenger, who was visiting Las Vegas. According to local and national news reports and police reports, the victim called for an Uber ride at the Las Vegas Strip and, approximately five minutes after being picked up by the Uber driver, she fell asleep in the rear passenger seat. After she fell asleep, the driver "canceled" the Uber ride in the ride-share app. The victim then woke up as her Uber driver was sexually assaulting her and raping her in the back seat of his car. She pleaded with him to stop. He ignored her pleas, continued to rape



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1 her, and strangled her until she was unconscious. He then “restarted” the ride in the  
2 ride-share app approximately 22 minutes after he had “canceled” the trip and delivered  
3 the victim to her destination, pulled her from the car, and tossed her clothes and  
4 belongings at her. At the time of the rape, the driver had been driving for Uber for six  
5 months. The driver was charged with first-degree kidnapping; sexual assault; battery  
6 by strangulation to commit sexual assault; and kidnapping involving sexual assault.  
7 As seen on the Las Vegas Justice Court docket, bail was denied. Additional news  
8 reports from early 2022 confirmed that the driver committed suicide while remanded  
9 to the local jail, and the court docket reflects that the case against him was dismissed  
10 on March 14, 2022, as he was deceased. *See* Register of Actions, Clark County Justice  
11 Court Case No. 21-CR-057087, attached hereto at **Exhibit 1**. *See also* Las Vegas Sun  
12 article dated December 24, 2021, attached hereto at **Exhibit 2**; New York Post article  
13 dated December 24, 2021, attached hereto at **Exhibit 3**; Las Vegas Review Journal article  
14 dated March 2, 2022, attached hereto at **Exhibit 4**.

15 3. **Gavin v. Uber Technologies, Inc.**, Northern District of California, Case  
16 No. 3:23-cv-02111-CRB: The victim in the criminal case described above was a twenty-  
17 year-old woman from Chicago named Taylor Gavin. Ms. Gavin filed a civil action for  
18 damages against Uber on May 1, 2023. Her case is currently pending before the United  
19 States District Court for the Northern District of California as part of the Multidistrict  
20 Litigation proceeding against Uber. *See Gavin v. Uber Technologies, Inc.*, Complaint,  
21 attached hereto at **Exhibit 5**. Uber has since filed a motion to transfer Ms. Gavin’s case  
22 to the District of Nevada. *See Gavin v. Uber Technologies, Inc.*, Defendants’ Motion to  
23 Transfer Venue to the District of Nevada, attached hereto at **Exhibit 6**. That motion  
24 remains pending.

25 4. **M.G. v. Uber Technologies, Inc.**, Northern District of California, Case  
26 No. 3:24-cv-01727: On November 1, 2022, while visiting Las Vegas on vacation from out  
27 of state, M.G.'s Uber driver took her off course, pressured her to come into his  
28 apartment, began trying to touch and kiss her, and then, when she asked him to stop,



1 forced himself upon her. M.G.'s civil case against Uber for damages is currently  
2 pending before the United States District Court for the Northern District of California  
3 as part of the Multidistrict Litigation proceeding against Uber. *See M.G. v. Uber*  
4 *Technologies, Inc.*, Complaint, attached hereto at **Exhibit 7**.

5         **5. K.K. v. Uber Technologies, Inc.**, Northern District of California, Case No.  
6 3:24-cv-01514: On November 18, 2023, K.K., a resident of Las Vegas, Nevada, was  
7 picked up at the Cosmopolitan in Las Vegas and dropped off at her home by an Uber  
8 driver. About an hour later, the driver entered K.K.'s home while she was sleeping. As  
9 she came to, the Uber driver held her arms back and began raping her. She kept telling  
10 him to stop, trying to kick him away. But the Uber driver continued to overpower her  
11 and sexually assaulted her. He did not use any form of protection while he penetrated  
12 her. K.K.'s civil case against Uber is currently pending before the United States District  
13 Court for the Northern District of California as part of the Multidistrict Litigation  
14 proceeding against Uber. *See K.K. v. Uber Technologies, Inc.*, Complaint, attached hereto  
15 at Exhibit 8.

16         **6. C.T. v. Uber Technologies, Inc., et al.**, Northern District of California,  
17 No. 3:23-cv-04310: On April 9, 2021, C.T., a Nevada resident, booked a round trip ride  
18 with Uber in Nevada. During the return trip, the Uber driver "immediately began  
19 making unwanted sexual gestures" toward her and engaged in "inappropriate sexual  
20 conversation" with her. He then "began groping her inner thighs and attempting to  
21 grope and fondle her vagina." She "repeatedly asked the Uber driver to stop." He  
22 refused. C.T. then "jumped out of the vehicle and ran to hide in a coffee shop." The  
23 Uber driver "stayed in the area," preventing her from returning home. C.T. "no longer  
24 feels safe using Uber" and the incident left her feeling "humiliated, violated, and  
25 robbed" of "her dignity and personal safety." C.T.'s civil case against Uber is currently  
26 pending before the United States District Court for the Northern District of California  
27 as part of the Multidistrict Litigation proceeding against Uber. *See C.T. v. Uber*  
28 *Technologies, Inc.*, Complaint, attached hereto at Exhibit 9.



1           7.       **Jane Doe v. Uber Technologies, Inc., et al.**, Eighth Judicial District Court,  
2 Case No. A-21-831066-C: In this civil action against Uber, a woman identified as “Jane  
3 Doe” alleges that her Uber driver – who, it was later revealed, was “a registered sex  
4 offender” – intentionally drugged her and her fellow female passengers. Jane Doe  
5 alleged that she arranged for an Uber to transport herself, her sister, and a friend on  
6 March 18, 2019, at approximately 12:26 a.m. Her complaint alleged that her Uber driver  
7 “made repeated crude and uncomfortable comments and commented on the  
8 passengers’ physical appearance and smell, causing anxiousness and fear.” Jane further  
9 alleged that the Uber driver “then showed [her] and the passengers a bottle of unknown  
10 liquid and asked them to smell it. They declined to do so.” The Uber driver then  
11 “demanded that they smell the bottle.” Jane Doe “refused to comply and felt fearful,”  
12 which prompted the Uber driver to “[cause] the liquid spray to be sprayed in the  
13 vehicle towards [Jane Doe] and she began to feel woozy and fell asleep.” Jane Doe’s  
14 sister “woke her up” and demanded that the passengers be let out of the vehicle, as  
15 they were “gasping for breath.” At 12:54 a.m., Jane Doe contacted the police and was  
16 “treated by paramedics on scene.” Among other things, Jane’s complaint alleges that  
17 Uber violated its duty of care by failing to perform an adequate background check – to  
18 ensure that it was not hiring a driver with “a history of criminal acts,” including “crimes  
19 of sexual assault.” Uber instead employed “a registered sex offender” to transport  
20 younger female passengers—a person who would foreseeably “attempt to harass,  
21 drug, or assault passengers.” See *Jane Doe v. Uber Technologies, Inc., et al.* Second  
22 Amended Complaint, attached hereto at **Exhibit 10**.

23           8.       **Kocic v. Uber Technologies, Inc., et al.**, Eighth Judicial District Court,  
24 Case No. A-19-805216-C: This civil action was brought by Svetlana Kocic, who alleged  
25 that her Uber driver stalked and harassed her, repeatedly visiting her workplace in  
26 person, many months after her Uber ride, and that Uber did nothing to stop it. She  
27 alleged that she used the Uber ride-share app on or about July 22, 2018, and was driven  
28 by her Uber driver, Gary Ross (also known as Gary Genovese and Gerald Genovese)



1 from her workplace to her home. Nearly six months later, on January 16, 2019, Ms.  
2 Kocic received an email from Mr. Ross that, among other things, stated “you’re a hard  
3 person to catch at work. I have been trying ever since before you went on vacation  
4 around Thanksgiving. My name is Ross and I’m sure you will remember me. I gave  
5 you a ride for Uber a few months ago. Normally I would not do this by email but maybe  
6 it is better as to not put you on the spot actually at work.... Anyway, I had been thinking  
7 of you leading up to Thanksgiving when you were gone and have tried a few more  
8 times but have been unsuccessful. What I wanted to ask you was a pretty simple  
9 question: Would you be interested in going with me to dinner sometime?” Ms. Kocic  
10 reported the email to Uber’s support team along with a complaint that Mr. Ross “had  
11 come to her work inquiring about [her] on several occasions. Despite contacting Uber  
12 on several occasions wherein [Ms. Kocic] indicated [Mr. Ross] continued to attempt to  
13 contact [her] in person and via e-mail, Uber and/or Raiser, LLC failed to resolve the  
14 matter.” On or about February 15, 2019, Ms. Kocic alleged that Mr. Ross “again came  
15 to [her] work attempting to make in person contact with [Ms. Kocic] and asked the staff  
16 about [Ms. Kocic’s] work schedule.” “Fearing for her safety, Plaintiff filed a police  
17 report on February 16, 2019” and a restraining order was subsequently issued on March  
18 11, 2019. See *Kocic v. Uber Technologies, Inc., et al.*, Complaint, attached hereto at **Exhibit**  
19 **11**.

20 9. **Davison v. Uber Technologies, Inc., et al.**, Eighth Judicial District Court,  
21 Case No. A-20-815805-C: This civil action was filed by Maisha Davison, the mother of  
22 Victoria Davison, a 14-year-old girl, alleging that Victoria was abducted and sexually  
23 and physically assaulted. The complaint alleges that, on March 1, 2020, at 2:00 a.m., an  
24 Uber driver known as “Shabane” picked up minor child Victoria from her home and  
25 transported her to an unknown location without the knowledge or consent of her  
26 mother or “any other guardian or caretaker.” Victoria was then missing for several  
27 days, prompting Ms. Davison to file “a Missing Person Report, an Amber Alert, as well  
28 as a Las Vegas Metropolitan Police Investigation.” Ms. Davison further alleges that,



1 “[w]hile at the unknown location, [Victoria] was sexually assaulted and suffered  
2 injuries ... and extreme emotional distress.” Several days later, on March 5, 2020, Uber  
3 driver “Quincy” picked up Victoria from an unknown location at approximately 2:30  
4 a.m. and transported her back home. Ms. Davison alleges that “Uber has a policy that  
5 a rider must be at least 18 years of age, that any rider under 18 years of age must be  
6 accompanied by a rider 18 years of age or older on any ride” and the defendants  
7 “violated Defendant Uber’s policy regarding transporting a minor.” *See Davison v. Uber*  
8 *Technologies, Inc., et al.*, Complaint, attached hereto at Exhibit 12.

9       10.     **Wilson v. Uber Technologies, Inc., et al.**, Eighth Judicial District Court,  
10 Case No. A-18-767222-C: This civil action was brought by Kyle Wilson and Roxanne  
11 Franks, who allege that their Uber driver violently and physically assaulted them. They  
12 alleged that Uber contracted “Lewis Smith” as a driver on or about November 29, 2016.  
13 After Mr. Smith arrived at their residence, he “became visibly upset and directed  
14 Plaintiffs to get out of the vehicle because Ms. Franks allegedly spilled a small amount  
15 of macaroni and cheese in the vehicle.” Mr. Smith “put on a pair of gloves from the  
16 driver’s side door, and walked around to the passenger side of the vehicle where Ms.  
17 Franks was.” When Mr. Wilson allegedly attempted to deescalate the situation, Mr.  
18 Smith then “pushed Mr. Wilson into the open door of the van, causing Mr. Wilson to  
19 strike the back of his head on the vehicle. Then, Smith immediately turned to Ms.  
20 Franks and proceeded to punch her in the face with a closed fist, causing her to fall to  
21 the pavement and causing the back of her head to hit the ground. Smith continued to  
22 repeatedly punch Ms. Franks, causing her to lose consciousness.” Following the  
23 assault, Mr. Smith re-entered his vehicle and began driving away from the scene with  
24 Ms. Franks’ dog in the vehicle. “Plaintiffs chased after the motor vehicle in an attempt  
25 to secure Ms. Franks’ dog. Smith then stopped the motor vehicle, got out, and  
26 continued his physical assault on Plaintiffs.” *See Wilson v. Uber Technologies, Inc., et al.*,  
27 Complaint, attached hereto at Exhibit 13.

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1           11.     **Barlow v. Robert Sult, Jr., John Eyraud, and Uber Technologies, Inc.,**  
2 Eighth Judicial District Court, Case No. A-23-868825-C: This civil action was brought  
3 by Tamojanae Barlow following events that occurred while she was an Uber rider on  
4 or about August 16, 2022. While Ms. Barlow was a passenger, her Uber driver  
5 “observed another vehicle near his vehicle. Instead of proceeding in a safe and orderly  
6 manner, [the Uber driver] began pontificating loudly – with his windows open –  
7 making gestures with his hands, etc. about how his ‘hands were registered weapons in  
8 Los Angeles’ and how he was ‘OG.’” The driver of the other vehicle, who has “gang  
9 affiliation and/or a significant criminal history,” “perceived [the Uber driver’s]  
10 gestures and statements as a threat,” and “exited his vehicle and began shooting a gun  
11 into the vehicle . . . striking and injuring [Ms. Barlow].” See *Barlow v. Robert Sult, Jr., et*  
12 *al.*, Complaint, attached hereto at **Exhibit 14**.

13           12.     **Brooks v. Preciado, Raiser LLC, and Uber Technologies, Inc.,** Eighth  
14 Judicial District Court, Case No. A-24-885841-C: This civil action was brought on behalf  
15 of Tona Brooks after an Uber ride on or about September 29, 2022, during which the  
16 Uber driver “was so distracted by his phone that he ran into the median in the road.”  
17 The impact with the median caused Ms. Brooks to be “thrown violently around the  
18 back seat so much that her head hit the front passenger’s seat head rest and quickly  
19 snapping her head back hitting the back seat headrest.” Ms. Brooks “suffered a  
20 traumatic brain injury” as a result. After impacting the median, Ms. Brooks “demanded  
21 to know what happened” and the Uber driver “in an apparent altered / intoxicated  
22 state ... commented that the lanes in the road were moving.” It was later determined,  
23 and alleged therein, that Uber failed to perform an adequate background check on the  
24 subject Uber driver, who was found to have multiple speeding tickets within the Las  
25 Vegas Justice Court (Case No. E1042937 and Case No. 23-CI-069243), a felony charges  
26 for possession of drugs within the Las Vegas Justice Court (Case No. 02F06250X and  
27 Case No. 02F13166X), and charges for misdemeanor 1) obstruction of a policy officer,  
28 2) evading a policy officer, and 3) unlawful possession of drug paraphernalia in Las





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1 Vegas Justice Court (Case No. PC02M18582X). *See Brooks v. Preciado, et al.*, Complaint,  
2 attached hereto at **Exhibit 15**.

3 13. **Phillips v. Uber Technologies, Inc., et al.**, Eighth Judicial District Court,  
4 Case No. A-24-886402-C: On or about February 5, 2022, an Uber driver was traveling  
5 north on Las Vegas Boulevard, near the entrance to Hilton Grand Vacation Club, with  
6 a passenger in tow. As Davion Leon Sowell was operating his motorcycle southbound  
7 on Las Vegas Boulevard, the Uber driver in question “violated his right of way,”  
8 causing a collision with Mr. Sowell’s motorcycle. Mr. Sowell was fatally injured and  
9 died a short time later; the Uber driver was charged and convicted of vehicular  
10 manslaughter as a result of the collision. *See Phillips v. Uber Technologies, Inc., et al.*,  
11 Complaint , attached hereto as **Exhibit 16**.

12 14. I have worked in the Nevada legal community since 2001 and am familiar  
13 with how to use the Odyssey Eighth Judicial District Court portal.

14 15. All state-court civil complaints attached hereto are true and correct copies  
15 as available from the Odyssey portal, and I personally downloaded them between  
16 March 28, 2024, and March 29, 2024.

17 16. The news articles listed as Exhibits 2, 3, and 4 are true and correct copies  
18 of news articles that I “printed” to PDF from the respective news providers’ websites  
19 after a “Google” search.

20 17. The federal-court complaints are true and correct copies downloaded  
21 from the federal courts’ PACER system.

22 I declare under penalty of perjury under the laws of the State of Nevada that the  
23 foregoing is true and correct. Executed in Las Vegas, Nevada, on April 4, 2024

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/s/ M. Lansdown  
Michelle J. Lansdown