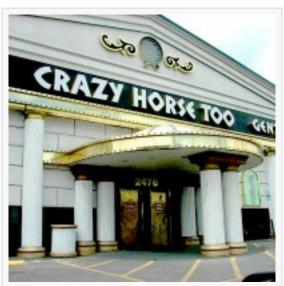


Nightlife Entrepreneurs Mike Galam & Craig Franze File Compelling Lawsuit Against City of Las Vegas

Mike Galam and Craig Franze File First Amendment Lawsuit Against City of Las Vegas, Karen E. Duddlesten, Director of Business Licensing Named Individually

LAS VEGAS, NV, USA, August 28, 2015 /EINPresswire.com/ -- Nightlife entrepreneurs <u>Mike Galam</u> and <u>Craig Franze</u>, represented by noted Las Vegas attorney <u>William H.</u> <u>Brown</u> and First Amendment powerhouse attorney Luke Lirot, filed suit today against the City of Las Vegas; Department of Planning, Business Licensing Division; and Karen E. Duddlesten, individually, for intentionally violating Galam's and Franze's First Amendment and other constitutional rights.

Crazy Horse Too Gentlemen's Club, LLC, acquired ownership of the Crazy Horse building and property and re-opened the infamous gentlemen's club in May 2013. In June 2014, Franze was brought in as managing partner, only to have City agents and the Business Licensing Division force the closure of the business



Crazy Horse Too, DBA The Horse 2013

through a variety of unfair and contrived enforcement efforts and the intentional abuse and manipulation of the City's licensing procedures, just two months later.

Tragically, Galam was forced to endure the City's actions while grieving the death of his longtime girlfriend and Mother of their three young children, notwithstanding the Crazy Horse Too Gentlemen's Club, LLC's expenditure of \$3.6 million in renovations, capital improvements and operating costs.

Complaint Summary:

This is a First Amendment and due process case seeking to remedy bureaucratic abuses and overreach by a local licensing board and its director. The Las Vegas Business Licensing Department (and its Director, Karen Duddlesten) regulate and enforce Title 6 of the Las Vegas Municipal Code, which governs the licensing of businesses that provide constitutionally protected erotic live entertainment and serve alcohol by the drink, like Crazy Horse Too Gentlemen's Club. Over the past year, Duddlesten has either (a) simply disregarded the law she is charged with enforcing; or (b) interpreted and applied the law as an unconstitutional prior restraint vesting her with unfettered discretion to decide who may exercise free speech rights, and on what conditions. This has deprived Crazy Horse Too, and the applicants and principals, thereto, Michael Galam and Craig Franze, of state and federal rights, all but extinguished a \$3.6 million business investment, and left Crazy Horse Too, Galam and Franze, with no choice but to sue to protect their rights and interests.

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