



1 **COMD**  
2 RADFORD J. SMITH, CHARTERED  
3 RADFORD J. SMITH, ESQ.  
4 Nevada Bar No: 002791  
5 GARIMA VARSHNEY, ESQ.  
6 Nevada Bar No. 011878  
7 2470 St. Rose Parkway, Suite 206  
8 Henderson, Nevada 89074  
9 (702) 990-6448  
10 (702)-990-6456 Facsimile  
11 rsmith@radfordsmith.com  
12 *Attorneys for Plaintiff*

CASE NO: D-21-639697-D  
Department: To be determined

10 **EIGHTH JUDICIAL DISTRICT COURT**  
11 **FAMILY DIVISION**  
12 **CLARK COUNTY, NEVADA**

12 SUZANNE M. LEE,  
13 Plaintiff,

CASE NO.:  
DEPT NO.:

14 v.

15 DANIEL R. LEE,  
16 Defendant.

18 **COMPLAINT FOR DIVORCE**

19  
20 COMES NOW, Plaintiff, SUZANNE M. LEE, by and through her attorneys  
21 RADFORD J. SMITH, ESQ. of the law offices of RADFORD J. SMITH,  
22 CHARTERED and for her cause of action against Defendant, DANIEL R. LEE, avers  
23 and alleges as follows:  
24

25 1. That Plaintiff is a resident of Clark County, Nevada, and has been for at least  
26 six weeks prior to the filing of this action;  
27

28 2. That the parties were married on April 22, 1995 in Clark County, Nevada,

1 and have been and husband and wife continuously since that date;

2 3. The parties have one minor child of this marriage, namely, Cody D. Lee, date  
3 of birth June 18, 2004 age 17.  
4

5 4. The parties should be awarded joint legal and joint physical custody of the  
6 minor child.  
7

8 5. Child support shall be calculated in accordance with the formula set forth in  
9 NAC 425.

10 6. Defendant should be ordered to provide medical and dental insurance for the  
11 minor child, with Defendant paying all deductibles and other expenses not reimbursed  
12 by insurance, until the child reaches the age of eighteen (18) years, graduates from high  
13 school, or otherwise emancipates, whichever occurs later, but in any event no later than  
14 the age of nineteen (19) years unless the child later develops special needs as defined by  
15 Nevada law.  
16  
17

18 7. There is community property of the parties to be equitably divided by this  
19 court, the full value and extent of which has not been determined at this time.  
20

21 8. There are community debts and/or obligations of the parties to be equitably  
22 divided by this court, the full value and extent of which has not been determined at this  
23 time.  
24

25 9. That there is separate property belonging to Plaintiff and such property  
26 should be confirmed to her as her sole and separate property;  
27

28 10. That Defendant has incurred debt that is separate, and is not an obligation of

1 the community;

2 11. That in the event either party has or will engage in acts individually or  
3 together with others that may constitute material waste of community assets, the Court  
4 should make an unequal division as is necessary to compensate the other party for such  
5 community waste pursuant to Nevada law;  
6

7 12. That Plaintiff has been required to retain the services of counsel in this  
8 matter, and based upon applicable law and fact applied in this case, Defendant should  
9 be required to pay the fees and costs incurred by Plaintiff; and,  
10

11 13. That the parties are now incompatible in marriage, such that their likes,  
12 dislikes, and tastes have become so widely divergent that they can no longer live  
13 together as husband and wife.  
14

15 **WHEREFORE**, the Plaintiff prays for judgment as follows:  
16

17 1. That the bonds of matrimony now and previously existing between  
18 Plaintiff and Defendant be forever and completely dissolved, and that each party be  
19 restored to the status of an unmarried person;  
20

21 2. The parties should be awarded joint legal and joint physical custody of  
22 the minor child.  
23

24 3. Child support shall be calculated in accordance with the formula set forth  
25 in NAC 425.  
26

27 4. Defendant should be ordered to provide medical and dental insurance for  
28 the minor child, with Defendant paying all deductibles and other expenses not

1 reimbursed by insurance, until the child reaches the age of eighteen (18) years,  
2 graduates from high school, or otherwise emancipates, whichever occurs later, but in  
3 any event no later than the age of nineteen (19) years unless the child later develops  
4 special needs as defined by Nevada law.  
5

6           5. For an equal division of community property and debt of the parties, or  
7 that the Court order an unequal division of community property or debt upon a showing  
8 that either party improperly used, transferred, gifted or wasted community assets;  
9

10           6. That Plaintiff's separate property be confirmed as her, free of all claims of  
11 Defendant;  
12

13           7. That Defendant be required to indemnify and hold Plaintiff harmless from  
14 his separate debt obligations;  
15

16           8. For an order directing Defendant to pay the attorney's fees and costs  
17 Plaintiff has incurred or incurs in this action; and,  
18

19           9. For such other and further relief as the court finds just in the premises.

20 DATED this 16th day of December 2021.

21 RADFORD J. SMITH, CHARTERED

22 /s/ Garima Varshney

23 RADFORD J. SMITH, ESQ.

24 Nevada State Bar No. 002791

25 GARIMA VARSHNEY, ESQ.

26 Nevada State Bar No. 011878

27 2470 St. Rose Parkway, Suite 206

28 Henderson, Nevada 89074

(702) 990-6448

[rsmith@radfordsmith.com](mailto:rsmith@radfordsmith.com)

*Attorneys for Plaintiff*

**VERIFICATION**

1 STATE OF NEVADA )  
2 ) ss.  
3 COUNTY OF CLARK )

4 I, SUZANNE M. LEE, declare under penalties of perjury:

5 1. That I am the Plaintiff in the above-entitled action;

6 2. I have read the foregoing Complaint for Divorce and know the contents  
7 thereof;  
8

9 3. That the foregoing Complaint for Divorce is true of my own knowledge,  
10 except for those matters therein contained stated upon information and belief, and that  
11 as to those matters, I believe them to be true.  
12

13  
14 **Pursuant to NRS 53.045 of the laws of the State of Nevada, I declare under  
15 penalty of perjury that the foregoing is true and correct.**

16 /s/ Suzanne M. Lee  
17 SUZANNE M. LEE

18 December 17, 2021  
19 DATED