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8 *Attorney for Plaintiff Daniel Wang*

CASE NO: A-25-911410-C  
Department 9

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

9 DANIEL WANG aka WANG JIANPING  
10 OR WANG JENPING, an individual,

11 Plaintiff,

12 vs.

13 KENT WU, an individual; JIA HUA, an  
14 individual; CRYSTAL HSIUNG; LAS  
15 VEGAS CHINESE NEWSPAPER aka LAS  
16 VEGAS CHINESE NEWS NETWORK  
17 (LVCNN) a corporation; DOES I through  
18 X; and ROES XI through XX,

19 Defendants.

Case No.:  
Dept. No.:

**VERIFIED COMPLAINT  
AND  
DEMAND FOR JURY TRIAL**

19 Plaintiff DANIEL WANG aka WANG JIANPING, (referred to hereinafter as "Plaintiff")  
20 by and through his attorney, Michael Sanft, Esq. of SANFT LAW, complains as follows against  
21 Defendants KENT WU ("Defendant Wu"), JIA HUA ("Defendant Hua"), CRYSTAL HSIUNG  
22 ("Defendant Hsiung") LAS VEGAS CHINESE NEWSPAPER aka LAS VEGAS CHINESE  
23 NEWS NETWORK LVCNN ("Defendant LVCNN"), and DOES I through X AND ROES XI  
24 through XX as follows:

**PARTIES, JURISDICTION, AND VENUE**

- 25 1. Plaintiff is an individual residing in Clark County, Nevada.
- 26 2. Upon information and belief, Defendants Wu, Crystal Hsiung, and Hua are  
27 individuals who reside in Clark County, Nevada.  
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1           3. Defendant LVCNN is a Nevada corporation conducting business as a newspaper  
2 in Clark County, Nevada, with its principal place of business located at 6450 Spring Mountain  
3 Rd., Ste 9, Las Vegas, NV 89146. Service of process can be perfected upon the LAS VEGAS  
4 CHINESE NEWS NETWORK by service of the Complaint and Summons upon its registered  
5 agreed agent Wei Tan at is registered office 3552 Wynn Rd., Las Vegas, NV 89103.

6           4. Defendant Wu is president of LVCNN.

7           5. Defendant Hua is a news reporter for LVCNN.

8           6. Defendant Hsiung formerly dated Plaintiff, prior to the allegations contained in  
9 this Complaint.

10           6. The true names and capacities, whether individual, corporate, associate, or  
11 otherwise, of DOE or ROE Defendants I through X, are unknown to Plaintiff, who therefore sues  
12 said Defendants by fictitious names. Plaintiff is informed and believes and thereupon alleges that  
13 each of the Defendants designated as a DOE Defendant is responsible in some manner for the  
14 events and happenings described herein. As such, Plaintiff will seek leave of the Court to amend  
15 this Complaint to insert the true names and capacities of said Defendants as they become  
16 identified and known to Plaintiff.

17           7. Jurisdiction of the Eighth Judicial District Court is proper in the matter, as the  
18 amount in damages is in excess of Fifteen Thousand Dollars and No Cents (\$15,000).

19           8. This Court has jurisdiction over the subject matter of this action and over the  
20 Defendants.

21           9. Venue is proper in this Court because the events giving rise to this claim occurred  
22 in Clark County, Nevada.

23                           **FACTUAL ALLEGATIONS RELATED TO ALL CLAIMS**

24           10. Upon information and belief, on or about May 2, 2024, Defendant Hua wrote the  
25 article at issue slandering Plaintiff.  
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- 32. Defendants intentionally published a blatantly untrue article about Plaintiff;
- 33. This publication was in reckless disregard;
- 34. Plaintiff suffered extreme emotional distress; and
- 35. Defendants' conduct was the actual cause of Plaintiff's emotional distress.

**SIXTH CAUSE OF ACTION**  
**Invasion of Privacy**  
**(Against All Defendants)**

36. Defendant's negligent action of making false and defamatory statements caused injury to the mental well-being of the plaintiff.

37. Defendant's conduct was a direct and proximate cause of the Plaintiff's damages.

**SEVENTH CAUSE OF ACTION**  
**Negligence**  
**(Against All Defendants)**

38. Plaintiff repeats and realleges each and every allegation contained within all previous paragraphs and by this reference, incorporates the same as though fully set forth herein

39. Defendant's negligent action of making false and defamatory statements caused injury to the mental well-being of the plaintiff.

40. Defendants' failed to fact-check claims and this directly led to harm of Plaintiff's personal and professional life.

41. Defendant's conduct was a direct and proximate cause of the Plaintiff's damages.

**EIGHTH CAUSE OF ACTION**  
**Libel**  
**(Against All Defendants)**

42. Defendants made a false and defamatory written or printed communication concerning Plaintiff.

43. The communication was published to a third party;

44. Defendants acted in reckless disregard of these matters, and acted negligently in failing to ascertain them and it defamed Plaintiff; and,

1           45. That the publication of the communication was a defamatory communication  
2           constituting libel per se.

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4                                   **NINTH CAUSE OF ACTION**  
5                                   **Slander**  
6                                   **(Against Defendant Hsiung)**

7           46. Defendant Hsiung made a false and defamatory oral communication regarding  
8           Plaintiff;

9           47. The communication was published to a third party;

10          48. Defendant Hsiung knew the communication was false and that it defamed  
11          Plaintiff;

12          49. Publication of the communication was a proximate cause of special damages to  
13          Plaintiff; and

14          50. The defamatory communication was slander per se.

15                                   **TENTH CAUSE OF ACTION**  
16                                   **Disparagement of a Business**  
17                                   **(Against All Defendants)**

18          51. Defendants published a false and disparaging statement that interfered with  
19          Plaintiff's business;

20          52. The statement was not privileged;

21          53. The statement was made with malice; and

22          54. Plaintiff suffered special damages as a result.

23                                   **ELEVENTH CAUSE OF ACTION**  
24                                   **Elder Abuse**  
25                                   **(Against All Defendants)**

26          55. Plaintiff is over the age of 60 years;

27          56. The public humiliation of the publication injured Plaintiff's mental and emotional  
28          health, resulting in his being forcibly removed to a mental institution for his own safety;

          57. Plaintiff has suffered a loss of income and business as a result of this abuse;

          58. Defendants knew or should have known that Plaintiff is elderly;

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59. Plaintiff is entitled to double actual damages; and

60. Since Defendants acted with recklessness, Plaintiff is entitled to an award of attorney fees and costs of the suit.

**TWELFTH CAUSE OF ACTION**  
**Negligent Hiring, Retention, and Supervision**  
**(Against LVCNN)**

61. LVCNN had a duty to protect Plaintiff from harm resulting from its employment of Defendant Wu and Defendant Hua;

62. LVCNN breached that duty by hiring, retaining, failing to train, supervise, or discipline Defendant Wu and/or Defendant Hua;

63. This breach is the proximate cause for Plaintiff's injuries; and

64. Plaintiff has suffered damages as a result.

**THIRTEENTH CAUSE OF ACTION**  
**Intrusion Upon the Seclusion of Another**  
**(Against LVCNN)**

65. Defendants intentionally published a false article about Plaintiff;

66. This article intruded into Plaintiff's solitude or seclusion;

67. This intrusion would be highly offensive to a reasonable person; and

68. This intrusion caused Plaintiff to suffer damages as a result.

**THIRTEENTH CAUSE OF ACTION**  
**Defamation Per Se**  
**(Against All Defendants)**

69. Each Defendant made at least one false statement of fact to a third party concerning Plaintiff;

70. Each false statement was a non-privileged publication to that third party;

71. Defendants, and each of them, made at least one false and defamatory statement to a third party that would tend to injury Plaintiff's business and/or profession;

71. Defendants, and each of them, made at least one false and defamatory statement to a third party that Plaintiff committed a sexual assault;

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72. Defendants either knew each Defamatory Statement was false and that Defendants defamed Plaintiff, acted in reckless disregard of the truth, or acted negligently in failing to ascertain the truth;

73. Plaintiff suffered damages as a result of the defamatory statements made by each Defendant.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays for judgment against each Defendant as follows:

- 1. For general damages in an amount to be proven at trial;
- 2. For special damages, including loss of earnings and business, in an amount to be proven at trial;
- 6. For punitive damages;
- 7. For costs of suit herein incurred; and
- 8. For such other and further relief as the Court deems just and proper.

**V.**  
**JURY DEMAND**

Plaintiff hereby demands a trial by jury.

**DATED** this 23rd day of January, 2025.

SANFT LAW



MICHAEL W. SANFT (8245)  
411 E. Bonneville Ave., Ste 360  
Las Vegas, Nevada 89101  
*Attorney for Plaintiff*




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**VERIFICATION**

I Daniel Wang, aka DANIEL WANG aka WANG JIANPING OR WANG JENPING, have read the foregoing Verified Complaint and know that the contents are true and correct of my own knowledge except for those matters therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under the penalty of perjury under the Law of the State of Nevada that the foregoing is true and correct.

DATED this 23rd day of January, 2025.



**DANIEL WANG**  
Plaintiff