

EXHIBIT 6

DATE FILED: June 14, 2019 4:05 PM
FILING ID: 14043905AA38B
CASE NUMBER: 2019CV30971

DISTRICT COURT, ADAMS COUNTY, COLORADO 1100 Judicial Center Drive Brighton, CO 80601 Phone: 303-654-3290	▲COURT USE ONLY▲
PALLAS CHIOGIOJI AND MELVIN CHIOGIOJI, Plaintiffs v. JASON S. PARDIKES; JSP CONSULTING, LLC, d/b/a THE NEUTRINO GROUP, Defendants.	
Attorneys for Plaintiff: William R. Rapson, #4897 Welborn Sullivan Meck & Tooley, P.C. 1125 - 17 th Street, Suite 2200 Denver, CO 80202 Phone No.: 303.830.2500 Fax No.: 303.832.2366 E-mail: brapson@wsmtlaw.com	Case No.: Division:
COMPLAINT	

COME NOW the Plaintiffs, Pallas Chiogioji and Melvin Chiogioji, by and through their attorney, William R. Rapson of Welborn Sullivan Meck & Tooley, P.C., and for their Complaint state as follows:

JURISDICTION

1. The Defendants are located in Adams County, Colorado.
2. The Defendant JSP Consulting, LLC (“JSP”) is a Colorado limited liability company that is currently delinquent.
3. The Neutrino Group is a trade name for JSP.
4. The transactions at issue occurred in Adams County.

5. Jurisdiction and venue are proper in Adams County.

FACTUAL ALLEGATIONS

6. Plaintiffs incorporate by this reference all of the allegations set forth in Paragraphs 1 through 5, above.

7. The Plaintiffs, as husband and wife and as co-owners of the llc interests, purchased a 10% limited liability interest in the Defendant, JSP, in 2005 for \$50,000.

8. The Defendant, Jason Pardikes, is and has been the managing member of JSP.

9. The Plaintiffs have asked the Defendants for all relevant financial documents and information from 2005-2019.

10. The only financial records provided by the Defendants are unaudited balance sheets for 2016-2018.

11. The Defendants continue to refuse to produce all other LLC financial records (*e.g.*, income tax returns; K-1 statements; income statements) of JSP.

FIRST CAUSE OF ACTION (Declaratory Judgment)

12. Plaintiffs incorporate by this reference all of the allegations set forth in Paragraphs 1 through 11, above.

13. Established Colorado law (*e.g.*, C.R.S. § 7-80-408(1)) imposes a fiduciary duty on limited liability managers to produce all relevant financial information to minority LLC members.

14. The Defendants' refusal to produce said records violates their fiduciary duty to the Plaintiff.

15. The Plaintiffs request that this Court order the Defendants to produce all financial records for JSP for 2005-2019.

SECOND CAUSE OF ACTION
(Damages for Breach of Fiduciary Duty)

16. Plaintiffs incorporate by this reference all of the allegations set forth in Paragraphs 1 through 15, above.

17. The Defendants are liable in damages for violating their fiduciary duty to the Plaintiff.

THIRD CAUSE OF ACTION
(Attorney Fees)

18. Plaintiffs incorporate by this reference all of the allegations set forth in Paragraphs 1 through 17, above.

19. The Defendants are liable to the Plaintiffs for the attorney fees they incur in this matter given the Defendants' legal obligation to produce what the Plaintiffs seek herein.

WHEREFORE, the Plaintiffs pray that this Court enter judgment against the Defendants and grant the relief requested together with costs, pre and post-judgment interest and the attorney fees incurred by the Plaintiffs to generate the relief required by Colorado law.

Dated: June 14, 2019.


WELBORN SULLIVAN MECK & TOOLEY, P.C.

By: *s/ William R. Rapson*
William R. Rapson

ATTORNEY FOR PLAINTIFF

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