

**STATE OF VERMONT**

**SUPERIOR COURT  
Chittenden Unit**

**CIVIL DIVISION**

**Docket No.** \_\_\_\_\_

<b>CHELSEI PARKER,</b>	)
	)
<b>Plaintiff,</b>	)
	)
<b>v.</b>	)
	)
<b>YA DUDE, LLC, d/b/a NECTAR'S,</b>	)
	)
<b>Defendant.</b>	)

**COMPLAINT AND JURY DEMAND**

**INTRODUCTION**

1. This case is about what happens when a downtown bar treats the City of Burlington like the Wild West, confiscating and then returning a firearm to an intoxicated patron threatening to kill another patron, telling the combatants to “take it outside” rather than calling the police, causing an outrageous and unacceptable threat to public safety. Due to Nectar’s negligence, Chelsi Parker, an innocent bystander, was gunned down in the street and nearly bled to death in front of this courthouse.

2. During the early morning hours on February 26, 2018, Plaintiff Chelsi Parker stood on the sidewalk directly in front of Nectar’s, a nightclub in downtown Burlington, Vermont. Ms. Parker was a patron/guest of Nectar’s for Reggae Night that had just concluded.

3. As Ms. Parker and approximately 15 other patrons/guests of Nectar’s stood on the sidewalk, neither they nor the police were aware of a series of altercations between Rashad Nashid and two brothers, Dennis and Karl Martin, who were also patrons/guests of Nectar’s that night. But Nectar’s knew.

4. These altercations included Mr. Nashid threatening the life of both Martins with his handgun and the exchange of curses and insults. Even though Nectar’s became aware of these threats, curses, and insults, Nectar’s served Mr. Nashid and the Martin brothers alcohol.

5. In response to these altercations, Nectar's confiscated but then inexplicably returned the handgun to Mr. Nashid. Nectar's subsequently served an armed Mr. Nashid more alcoholic beverages as tensions between Mr. Nashid and the Martins escalated.

6. Despite being aware of the potentially lethal combination of alcohol, firearms, and escalating tensions between three intoxicated individuals in a packed nightclub, Nectar's failed to warn anyone of the altercations between Mr. Nashid and the Martin brothers, and failed to notify the police. Instead, Nectar's instructed Mr. Nashid and Karl Martin to "take it outside."

7. Nectar's failure to warn the public or call the police, together with its decision to hand Mr. Nashid back his gun and tell the known combatants to "take it outside," resulted in Mr. Nashid shooting Ms. Parker in the chest.

8. Nectar's profoundly irresponsible actions, including but not limited to its dereliction of its fundamental responsibility to take reasonable steps to keep its patrons and the public safe, and its shameful disregard for basic common sense, caused Ms. Parker to suffer violent and permanent injuries, changing her life forever.

#### **PARTIES, JURISDICTION, VENUE**

9. Plaintiff Chelsi Parker is a 27 year-old woman who resides in Chittenden County in the State of Vermont.

10. Defendant Ya Dude, LLC is a limited liability company formed in Vermont and registered to do business in Vermont with a principal place of business in Burlington, Vermont.

11. Ya Dude, LLC operates through the trade name "Nectar's." Nectar's is a bar, nightclub, and restaurant located at 188 Main Street in Burlington, Vermont.

12. Nectar's holds itself out as a place to see live music in Burlington, Vermont.

13. Nectar's hosts "Reggae Night" each Sunday night. It advertises and promotes Reggae Night to the public.

14. Ya Dude, LLC operates Nectar's through its employees and agents.

15. At all relevant times, Jamael Regular was an employee of Ya Dude, LLC doing business as Nectar's. Mr. Regular served as a night manager and bouncer at Nectar's during the evening of February 25, 2018 and the early morning hours of February 26, 2018.

16. At all relevant times, Aaron Twitty and Duke Bromfield were employees of Ya Dude, LLC doing business as Nectar's. Mr. Twitty and Mr. Bromfield served as bouncers at Nectar's during the evening of February 25, 2018 and the early morning hours of February 26, 2018.

17. Ya Dude, LLC's managers and bouncers are responsible for ensuring the safety of Nectar's patrons and invitees.

18. Ya Dude, LLC doing business as Nectar's is vicariously liable for the acts and omissions of its employees and agents including Mr. Regular, Mr. Twitty, and Mr. Bromfield.

19. This Court has jurisdiction pursuant to 4 V.S.A. § 31.

20. Venue is proper under 4 V.S.A. § 37 and 12 V.S.A. § 402 because Ms. Parker resides in Chittenden County, Vermont.

### **FACTS**

#### *Nectar's Reggae Night*

21. On the evening of February 25, 2018 and the early morning hours of February 26, 2018, Chelsi Parker and her friends attended Reggae Night at Nectar's in Burlington, Vermont.

22. Ms. Parker was a patron and invitee of Nectar's.

23. Rashad Nashid was a patron and invitee of Nectar's during the evening of February 25, 2018 and the early morning of February 26, 2018.

24. Dennis Martin and Karl Martin were patrons and invitees of Nectar's during the evening of February 25, 2018 and the early morning of February 26, 2018. Dennis and Karl Martin are brothers.

*Guns, Death Threats, and Alcohol Inside Nectar's*

25. Around 11:00 p.m. on February 25, 2018, Mr. Nashid approached Dennis Martin and threatened his life inside Nectar's. The basis of this altercation was Mr. Nashid's belief that Dennis Martin had "violated" Mr. Nashid's girlfriend.

26. During that altercation, Mr. Nashid pulled a handgun from his pants and pointed it at Dennis Martin's face and stomach/side.

27. Karl Martin and other patrons of Nectar's witnessed this altercation.

28. Mr. Nashid told the Martin brothers that he was going to kill Dennis Martin. Mr. Nashid stated that if Dennis went outside of Nectar's, Mr. Nashid would kill him.

29. Mr. Nashid told Karl Martin: "If you [Karl] don't kill me [Nashid], I'm going to kill him [Dennis]."

30. The Martin brothers were afraid that Mr. Nashid would shoot one or both of them with his handgun.

31. Upon information and belief, Dennis Martin also brandished a gun at Mr. Nashid during this altercation inside Nectar's.

32. Nectar's served alcohol to Mr. Nashid and, upon information and belief, to the Martin brothers during the evening of February 25, 2018 and into the early morning hours of February 26, 2018.

33. Nectar's served alcohol to these men throughout the night even though it had knowledge of Mr. Nashid's death threats and the numerous insults exchanged between Mr. Nashid on the one hand and the Martin brothers on the other.

*Nectar's Possession of Mr. Nashid's Handgun*

34. At or around 11:15 p.m. on February 25, 2018, one of the patrons at Nectar's informed Jamael Regular of the altercation between Mr. Nashid and the Martin brothers.

35. The patron told Mr. Regular that two people were flashing their guns at each other inside Nectar's. The patron identified Mr. Nashid and Dennis Martin as the two people who were flashing their guns inside Nectar's.

36. Mr. Regular recognized Mr. Nashid as a frequent patron of Nectar's.

37. Mr. Regular recognized Dennis Martin and Karl Martin as weekly patrons of Nectar's. Mr. Regular knew Dennis Martin's name. He also knew that a frequent female patron of Nectar's had obtained a restraining order against Dennis.

38. At or around 11:30 p.m. on February 25, 2018, Mr. Nashid and Mr. Regular discussed the altercation. This resulted in Mr. Nashid handing over his handgun to Mr. Regular.

39. Mr. Regular wrapped Mr. Nashid's handgun in plastic and placed it in a backroom at Nectar's.

*Nectar's Failure to Determine If Martin Brothers Are Armed*

40. Mr. Regular next spoke with Dennis Martin. He told Dennis he did not want "anything to happen here."

41. Aaron Twitty—a Nectar's employee and bouncer—also spoke with Dennis Martin and encouraged him to put his gun in his car.

42. Mr. Twitty told the Martin brothers that Nectar's had taken Mr. Nashid's handgun from him.

43. Because Dennis Martin left Nectar's for ten minutes after his conversations with Nectar's employees, Mr. Regular speculated that Dennis secured his gun in a nearby car before re-entering Nectar's.

44. Neither Mr. Regular nor any other Nectar's employee determined at any time on February 25, 2018 or February 26, 2018, whether Dennis or Karl Martin possessed a gun inside Nectar's.

45. Despite having knowledge that two of its patrons had brandished firearms inside the bar, Nectar's did not notify the police of this altercation between Mr. Nashid and the Martin brothers or otherwise take action to protect its patrons.

*Escalating Tensions Between Karl Martin and Mr. Nashid*

46. Karl Martin was upset that Mr. Nashid had brandished a handgun at Dennis Martin. Karl told Mr. Regular that “if I had my gun in the club I would have shot [Mr. Nashid] right in the club.”

47. As the night went on, Karl Martin and Mr. Nashid continued to exchange insults inside Nectar’s.

48. Around midnight, Duke Bromfield—a Nectar’s employee and bouncer—witnessed Mr. Nashid “getting loud for no reason.” Mr. Bromfield heard Mr. Nashid say, “These fucking Africans . . . they think they run this town.” Due to this disturbance, Mr. Bromfield asked Mr. Nashid to leave Nectar’s, which he did.

49. When Mr. Nashid exited Nectar’s around midnight, he was yelling on the sidewalk directly in front of Nectar’s. He yelled: “I’ll kill you,” “I’ll hurt you,” “I’ll kill those guys,” “I can’t stand Africans,” and “I hate Africans.” He also yelled: “I’ll fuck them up. I don’t like these Africans.”

50. Mr. Nashid continued yelling for two to three minutes as he spoke to Nectar’s bouncers including Mr. Regular. Mr. Regular knew or should have known that Mr. Nashid was referring to one or both of the Martin brothers on the sidewalk when he made the threats and insults (e.g., “I’ll kill you,” “I’ll kill those guys,” and “I hate Africans”).

*Nectar’s Returns Mr. Nashid’s Handgun*

51. Around 12:30 a.m. on February 26, 2018, Mr. Regular agreed to meet Mr. Nashid in the alleyway between Nectar’s and the Esox bar and handed Mr. Nashid’s gun back to him.

52. Mr. Nashid told Mr. Regular in the alleyway that the “African dudes keep messing with me. They keep talking down to me.”

53. Even though Mr. Regular understood the “African dudes” to be the Martin brothers, that the Martin brothers remained inside Nectar’s with other patrons, that Mr. Nashid had threatened to kill the Martin brothers, and that an ongoing altercation existed between the Martin brothers and Mr. Nashid, Mr. Regular returned the handgun to Mr. Nashid.

54. One of the bouncers at Nectar's informed the Martin brothers that Nectar's returned the handgun to Mr. Nashid.

*Mr. Nashid's Re-entry Into Nectar's  
Armed with His Handgun to Scare Martin Brothers*

55. Shortly after Mr. Regular returned the handgun, Mr. Nashid re-entered Nectar's with the loaded handgun. Mr. Nashid re-entered Nectar's through the front entrance that was staffed with Nectar's bouncers.

56. While those bouncers were stationed at the front door to monitor incoming patrons for, among other things, safety concerns, they nonetheless allowed Mr. Nashid to re-enter the bar armed with his handgun. They allowed him to do so even though they knew or should have known that Mr. Nashid was armed and dangerous, had recently threatened the lives of patrons, and had recently been asked to leave Nectar's.

57. Nectar's bartenders continued to serve Mr. Nashid alcohol until he decided to leave Nectar's to go to the Esos bar adjacent to Nectar's. The bartenders and bouncers knew or should have known that Mr. Nashid was intoxicated.

58. Upon information and belief, no bouncer told the bartenders not to serve Mr. Nashid alcohol.

59. The bartenders either served Mr. Nashid alcohol knowing of the prior altercations and that he was armed and dangerous, or they served him alcohol without such knowledge because the bouncers failed to inform them of the same.

60. Mr. Regular believed Mr. Nashid re-entered Nectar's for a short period of time after getting his handgun back so he could scare the Martin brothers.

61. Despite the belief that Mr. Nashid had re-entered Nectar's with his handgun to scare the Martin brothers and that he was intoxicated inside Nectar's, Mr. Regular and Nectar's did not notify the public or the police of the ongoing altercation between Mr. Nashid and the Martin brothers.

*Nectar's Instruction To Karl Martin And  
An Armed Mr. Nashid To "Take It Outside"*

62. From approximately 12:30 a.m. to 1:30 a.m., an armed Mr. Nashid drank alcohol inside Nectar's. During this period, Mr. Nashid and Karl Martin were in each other's faces arguing.

63. At approximately 1:30 a.m., Mr. Nashid started to make his way to the Nectar's exit to go to the Esox bar. Karl Martin followed antagonizing Mr. Nashid.

64. The bouncers tried to keep them separated.

65. One of the bouncers who was employed by Nectar's told Mr. Nashid and Karl Martin, **"Whatever happens . . . not here. Take it outside."** Mr. Nashid and Karl Martin followed that instruction and exited Nectar's.

66. Upon exiting Nectar's, Karl Martin continued to curse at Mr. Nashid as Mr. Nashid walked on the sidewalk toward the Esox bar. Mr. Nashid said: "Smoke these faggot ass niggas."

67. Nectar's employees heard and were aware of these threats exchanged between Karl Martin and Mr. Nashid.

68. Upon information and belief, Mr. Nashid was intoxicated when he left Nectar's to go to the Esox bar because Nectar's continued to serve him alcohol all night.

69. After Mr. Nashid entered the Esox bar, Karl Martin told Mr. Regular that he was stupid for giving the handgun back to Mr. Nashid and not calling the police given that Mr. Nashid had threatened Dennis Martin's life.

70. Nectar's still did not notify the police of the ongoing altercation between Mr. Nashid and the Martin brothers.

*Karl Martin Arms Himself and Assaults Mr. Nashid*

71. Karl Martin crossed Main Street and obtained his gun from a car prior to 2:00 a.m. on February 26, 2018.

72. Dennis Martin remained inside Nectar's. Karl Martin waited for his brother to exit Nectar's so he could watch out for Mr. Nashid.



73. Patrons of Nectar's congregate directly outside of Nectar's on the sidewalk at the end of a show like Reggae Night at 2:00 a.m. to converse and smoke. Nectar's was aware that people congregate outside its doors at 2:00 a.m.

74. Around 2:00 a.m. on February 26, 2018, Karl Martin observed Mr. Nashid exit the Esox bar and approach the front doors of Nectar's. Mr. Nashid was waiting for Dennis Martin to exit Nectar's at that time as he knew that Nectar's closed at 2:00 a.m. and Dennis Martin would likely exit then.

75. Around 2:00 a.m. on February 26, 2018, the reggae music inside Nectar's stopped, the lights turned on, and the patrons and invitees of Nectar's—including Ms. Parker and Dennis Martin—worked their way to the exit.

76. Mr. Nashid approached Dennis Martin as he exited Nectar's. Mr. Nashid had his hand on his handgun as he approached Dennis.

77. Meanwhile, Karl Martin approached where his brother and Mr. Nashid stood in front of Nectar's. Karl was armed with his gun.

78. Nectar's knew or should have known that Karl Martin was watching for his brother and Mr. Nashid across the street from Nectar's. Nectar's knew or should have known that Mr. Nashid approached the Nectar's exit to wait for Dennis Martin.

79. In light of the earlier altercations, insults, death threats, and that Mr. Nashid was armed and Karl Martin was likely armed since he was waiting at a car where Nectar's believed a gun was stored, Nectar's knew or should have known that a dangerous situation was brewing.

80. When Karl Martin made it to the sidewalk directly in front of Nectar's, he punched Mr. Nashid in the face with his fist. He then pointed his gun at Mr. Nashid.

*Mr. Nashid Aims At Karl Martin,  
But Shoots Ms. Parker*

81. Mr. Nashid in turn fired his handgun twice in the direction of the Martin brothers and approximately 15 other patrons of Nectar's.

82. Ms. Parker was standing on the sidewalk directly in front of Nectar's (along with other Nectar's patrons) when one of the bullets fired from Mr. Nashid's handgun struck her chest. The other bullet smashed through a window into a nearby apartment.

83. Nectar's did not telephone the police regarding the altercations between Mr. Nashid and the Martin brothers during the evening of February 25, 2018 and the early morning hours of February 26, 2018. Nectar's telephoned the police only after Mr. Nashid shot Ms. Parker.

*Ms. Parker's Permanent Injuries*

84. The bullet struck Ms. Parker in the right chest and exited through her right armpit.

85. Ms. Parker's injuries include a lung contusion, collapsed lungs, blood in the chest cavity, fractured rib, hepatic lacerations with active hemorrhage, and grade IV liver laceration.

86. Ms. Parker was treated at the University of Vermont Medical Center ("UVMHC") for her injuries.

87. Ms. Parker underwent multiple painful surgeries at UVMHC including a thoracotomy, decortication, diaphragm repair, and the insertion and removal of chest tubes.

88. Ms. Parker was hospitalized at UVMHC for approximately three weeks.

89. Ms. Parker suffers from permanent injuries caused by the shooting including decreased lung capacity and damage to her diaphragm.

90. The shooting's impact on her life includes the inability to perform even moderately vigorous cardiovascular activity (e.g., jogging) and frequent, at times daily, pain in the right side of her chest/abdomen.

91. Given that Ms. Parker is only 27 years-old, the full scope of the shooting's impact on Ms. Parker's health and life remains to be determined.

92. In addition to the pain, suffering, and mental anguish caused by being shot by a handgun, Ms. Parker was unable to work and earn income during the initial period of her recovery.

### **COUNT I – COMMON LAW NEGLIGENCE**

93. The allegations set forth in the preceding paragraphs are incorporated herein as if set forth in full.

94. Nectar's owed Ms. Parker a duty to prevent Mr. Nashid from causing physical harm to her because a special relation existed between Ms. Parker and Nectar's—i.e., Nectar's invited the public to attend Reggae Night and Ms. Parker was a patron/guest of Nectar's on Reggae Night.

95. The facts and circumstances regarding the altercations between Mr. Nashid and the Martin brothers should have caused Nectar's to anticipate conduct from Mr. Nashid likely to endanger the safety of its patrons/guests.

96. Reasonably prudent employees of a bar/nightclub/restaurant like Nectar's operating under these circumstances would have foreseen an unreasonable risk of injury to its patrons/guests presented by someone like Mr. Nashid.

97. These facts and circumstances include Mr. Nashid's death threats to the Martin brothers, and that Nectar's returned a loaded handgun to Mr. Nashid while tensions between Mr. Nashid and the Martin brothers were ongoing.

98. After returning the handgun, Nectar's allowed Mr. Nashid to re-enter Nectar's to scare the Martin brothers and to subsequently remain on the sidewalk directly outside of Nectar's even though Dennis Martin—who Mr. Nashid threatened to kill with his handgun—was inside Nectar's. Nectar's neither notified the police nor its patrons/guests of the danger presented by these altercations.

99. When Mr. Nashid and Karl Martin cursed at each other, Nectar's told them to "take it outside." Nectar's knew or should have known that patrons/guests congregate on the sidewalk directly outside of Nectar's and that taking the altercation to the sidewalk jeopardized the safety of its patrons/guests.

100. The facts and circumstances discussed in detail above created special knowledge and notice sufficient to impose upon Nectar's a duty to protect its patrons/guests (e.g., Ms. Parker) from Mr. Nashid.

101. Nectar's was therefore required to take reasonable steps, precautions, and actions to protect its patrons/guests (e.g., Ms. Parker) from the foreseeable criminal acts of Mr. Nashid which include the firing of his handgun into a crowd of patrons/guests on the sidewalk directly outside of Nectar's.

102. Nectar's failed to take reasonable steps, precautions, and actions under the circumstances to reduce or eliminate the unreasonable risk of harm that Mr. Nashid presented to Nectar's patrons/guests (e.g., Ms. Parker).

103. Nectar's failed to warn its patrons/guests of the dangerous condition (i.e., an armed and threatening Mr. Nashid) and failed to make the condition reasonably safe by notifying the police or asking Mr. Nashid and the Martin brothers to leave Nectar's unarmed and at separate times.

104. Instead of taking these reasonable steps, precautions, and actions, Nectar's returned the handgun to Mr. Nashid, continued to serve him and the Martin brothers alcohol, and—when the altercations intensified between Mr. Nashid and Karl Martin—directed them to “take it outside.”

105. It is common knowledge that alcohol unduly excites the temper, emotions, and actions of those who imbibe it.

106. Upon information and belief, Mr. Nashid exhibited signs to Nectar's of being intoxicated from alcoholic beverages.

107. Nectar's had ample time to defuse the situation by taking the reasonable steps, precautions, and actions discussed above. Nectar's nonetheless failed to do so, breaching the duty owed to Ms. Parker.

108. Nectar's nonfeasance caused Ms. Parker to be shot by Mr. Nashid, resulting in Ms. Parker's injuries.

109. Ms. Parker's injuries were proximately caused by Nectar's breach of the duty owed to Ms. Parker.

## **COUNT II – NEGLIGENT ENTRUSTMENT**

110. The allegations set forth in the preceding paragraphs are incorporated herein as if set forth in full.

111. Nectar's owed Ms. Parker a duty to prevent Mr. Nashid from causing physical harm to her because a special relation existed between Ms. Parker and Nectar's—i.e., Nectar's invited the public to attend Reggae Night and Ms. Parker was a patron/guest of Nectar's on Reggae Night.

112. The facts and circumstances discussed in detail above created special knowledge and notice sufficient to impose upon Nectar's a duty to protect its patrons/guests (e.g., Ms. Parker) from Mr. Nashid.

113. Although Nectar's confiscated Mr. Nashid's handgun inside the bar, Nectar's returned the handgun to Mr. Nashid even though an ongoing altercation existed between Mr. Nashid and the Martin brothers.

114. Prior to returning the handgun to Mr. Nashid, Nectar's was aware that Mr. Nashid threatened to kill the Martin brothers with the handgun and that the Martin brothers and others including Ms. Parker remained inside Nectar's as patrons.

115. Nectar's was negligent and foolish in entrusting Mr. Nashid with the handgun since Nectar's knew or should have known that Mr. Nashid intended or was likely to use the handgun to shoot the Martin brothers and other patrons/guests (e.g., Ms. Parker) within the vicinity of the Martin brothers. Such use of the handgun clearly created an unreasonable risk of harm to others.

116. This risk materialized when Mr. Nashid fired two shots from his handgun toward the Martin brothers and other patrons/guests of Nectar's who were standing on the sidewalk directly in front of Nectar's.

117. By entrusting the handgun to Mr. Nashid, Nectar's malfeasance caused Ms. Parker to be shot by Mr. Nashid which resulted in Ms. Parker's injuries.

118. Ms. Parker's injuries were proximately caused by Nectar's malfeasance.

### **COUNT III – PREMISES LIABILITY**

119. The allegations set forth in the preceding paragraphs are incorporated herein as if set forth in full.

120. Ms. Parker was a patron/guest/invitee of Nectar's Reggae Night.

121. Nectar's owed Ms. Parker a duty of active and reasonable care to keep its premises in a safe and suitable condition for Ms. Parker to enjoy Reggae Night without unreasonable exposure to danger.

122. Through the acts and omissions discussed in detail above (e.g., failing to notify the police of the altercations between patrons of the bar and returning the handgun to Mr. Nashid), Nectar's breached its duty of care owed to Ms. Parker.

123. Nectar's knew or should have known that Mr. Nashid was dangerous and posed an unreasonable risk of harm to Nectar's patrons/guests/invitees including Ms. Parker.

124. Nectar's knew or should have known that Ms. Parker would not discover or realize the danger.

125. As a direct and proximate result of Nectar's breaches of its duty of care, Ms. Parker was injured when Mr. Nashid shot her.

WHEREFORE, Plaintiff Chelsi Parker requests that the Court enter judgment in her favor on all counts and award her the following:

- A. Damages for her past and future medical and medication expenses;
- B. Damages for her permanent injuries;
- C. Damages for her past and future loss of income;
- D. Damages for her past and future pain and suffering;
- E. Damages for her past and future mental anguish;
- F. Damages for her past and future anxiety;


- G. Damages for her past and future loss of enjoyment of life;
- H. Attorneys' fees and costs; and
- I. Such further relief as the Court considers just and appropriate.

**JURY DEMAND**

Plaintiff Chelsi Parker requests a trial by jury on all issues so triable.

DATED at Burlington, Vermont, this 16<sup>th</sup> day of January, 2019.

**CHELSEI PARKER**

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