

IN THE SUPREME COURT OF THE STATE OF NEVADA

JACQUELINE FRANKLIN, ASHLEIGH
PARK, LILLY SHEPARD, STACIE
ALLEN, MICHAELA DEVINE,
KARINA STRELKOVA and DANIELLE
LAMAR, INDIVIDUALLY, AND ON
BEHALF OF A CLASS OF
SIMILARLY SITUATED
INDIVIDUALS,

Appellants,

vs.

RUSSELL ROAD FOOD AND
BEVERAGE, LLC,

Respondents.

Case No. 74332

District Court Case No. A-14-
709372-C

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Nevada

JOINT APPENDIX – VOLUME IX

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DISTRICT COURT

CLARK COUNTY, NEVADA

JACQUELINE FRANKLIN,)	
ASHLEIGH PARK, LILY SHEPHERD,)	
STACIE ALLEN, MICHAELA)	
DIVINE, VERONICA VAN WOODSEN,)	
SAMANTHA JONES, KARINA)	
STRELKOVA, LASHONDA, STEWART,)	Case No.
DANIELLE LAMAR, and DIRUBIN)	A-14-709372
TAMAYO, individually, and on)	
behalf of a class of)	
similarly situated)	
individuals,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
RUSSELL ROAD FOOD AND)	
BEVERAGE, LLC, a Nevada)	
limited Liability company)	. . .

DEPOSITION OF STACIE ALLEN

Taken on Wednesday, January 4, 2017

At 1:38 o'clock p.m.

At 630 South Fourth Street

Las Vegas, Nevada

Reported by: Helen M. Zamba, CCR #439

1 (d/b/a CRAZY HORSE III) . . .
2 GENTLEMAN'S CLUB), DOE CLUB)
3 OWNER, I-X, ROE CLUB OWNER,)
4 I-X, and ROE EMPLOYER, I-X,)
5 Defendants.)
6)
7)
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20)
21)
22)
23)
24)
25)
AND RELATED COUNTERCLAIMS)

1 APPEARANCES:

2 For the Plaintiffs:

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5 For the Defendants:

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I N D E X

Witness	Direct	Cross	Red.	Rec.
Stacie Allen				
(By Ms. Smith)	5			

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1 (Counsel stipulated to waive the
2 reporter requirements under
3 Rule 30(b)(4).)

4 Thereupon--

5 STACIE ALLEN
6 was called as a witness by the Defendants, and having
7 been first duly sworn, testified as follows:

8 DIRECT EXAMINATION

9 BY MS. SMITH:

10 Q. Good morning, Ms. Allen.

11 A. Good morning.

12 Q. How are you?

13 A. Fine. How are you?

14 Q. Good. Can you please state and spell your
15 full name for the record.

16 A. S-t-a-c-i-e, A-l-l-e-n. Stacie Allen.

17 Q. All right. No middle name?

18 A. Jo, J-o.

19 Q. Okay. So you were just sworn in by the
20 court reporter.

21 A. Uh-huh.

22 Q. Have you had your deposition taken before?

23 A. No.

24 Q. Okay. The oath has the same effect that it
25 would have if you were in a courtroom. So we're

1 entitled to your best, most honest testimony.

2 A. Uh-huh.

3 Q. Have you done any drugs or alcohol prior to
4 coming to --

5 A. No.

6 Q. -- this deposition?

7 A. I don't do drugs.

8 Q. Any reason that you cannot go forward this
9 afternoon to give your --

10 A. No.

11 Q. -- best testimony?

12 A. Good.

13 Q. Okay. Now, after we're finished, after a
14 period of time, you will receive a copy of your
15 transcript here today.

16 A. Okay.

17 Q. You'll be able to review that. There may be
18 places where there are, you know, blank spots left for
19 names, things that you might know if you went back
20 home and looked at documents that you have.

21 So those things, you know, might be things
22 that you need to fill in.

23 If you change any of your answers, like from
24 a yes to a no, or start adding in extra facts, then
25 I will most likely be able to call you back in here

1 and retake your deposition as to those changes and
2 additions.

3 Do you understand?

4 A. Yes.

5 Q. Okay. As you can see, the court reporter is
6 taking down everything we say verbatim.

7 So that means verbal responses are really
8 important, yeses and nos, not just uh-huh or nodding
9 your head, which I know is the --

10 A. Yes.

11 Q. -- natural thing to do. So it's okay. You
12 know, sometimes it takes a while to get used to. But
13 just try to do that. It makes it easier for her.

14 Now, today I'm entitled to your best
15 estimate, but I don't want you to guess at things.

16 You understand the --

17 A. Yes.

18 Q. -- difference between a guess and an
19 estimate?

20 A. Yes.

21 Q. Okay. I'm going to try to ask clear
22 questions. Sometimes they may be better than others.

23 But if you don't understand something that
24 I'm saying, please ask me --

25 A. Okay.

1 Q. -- and I can try and clarify or rephrase it
2 in a way that you can understand it better.

3 A. Okay.

4 Q. From time to time, your attorney might make
5 an objection. So when you answer -- before you answer,
6 if you try to pause briefly to allow her to make that
7 objection.

8 She might have gone over this with you. I
9 don't want to know.

10 But unless she instructs you specifically
11 not to answer, that means after she's stated her
12 objection for the record, you can go ahead and provide
13 an answer.

14 A. Okay.

15 Q. You have -- you can take a break if you need
16 to. I usually take about a five-minute break once
17 every hour.

18 If you need more or if you suddenly need to
19 use the restroom, feel free to ask.

20 The only time I would ask you to refrain
21 from taking a break is if I have just asked you a
22 question.

23 A. Absolutely.

24 Q. Then I would need you to answer the
25 question, and then we could take a break.

1 Are you involved in any other lawsuits
2 currently?

3 A. Yes.

4 Q. Which ones?

5 A. The other -- some of the other club ones.

6 Q. Okay.

7 A. It's in within that.

8 Q. Which specific clubs?

9 A. Olympic Gardens and Treasures.

10 Q. Okay. And do you have the same claims
11 against those as --

12 A. Yes.

13 Q. -- you're making against Russell Road?

14 A. Yes.

15 Q. Okay. Now, you probably guessed this, but
16 I'm here on behalf of Russell Road Food and Beverage,
17 doing business as Crazy Horse III Gentleman's Club.

18 I'm going to use the term Crazy Horse to
19 actually --

20 A. That's fine.

21 Q. -- refer to the defendant's premises.

22 A. (Witness nodding head.)

23 Q. And that's another thing. So sometimes I
24 think you're anticipating the question I'm going to
25 say or what I'm going to ask you.

1 So just try to refrain from doing that,
2 because it makes it harder for the court reporter to
3 take down your response and my full question.

4 A. Yes.

5 Q. Don't worry about it. It happens. It's not
6 that big of a deal. So we'll go forward from there.

7 Okay. What is the highest level of
8 education you have?

9 A. Some college.

10 Q. Okay. Where did you attend some college at?

11 A. California.

12 Q. Okay. Any specific institution?

13 A. A couple different ones.

14 Q. Okay.

15 A. Moorpark.

16 Q. Okay.

17 A. (Witness nodding head.)

18 Q. What year was that?

19 A. I'm thinking. 1990 -- probably 2 and 3, and
20 then 1996 --

21 Q. Okay.

22 A. -- and 7.

23 Q. And you didn't complete your degree?

24 A. I have a designer degree.

25 Q. Okay. Is that like an AA or a BA?

1 A. Just a -- a certificate of design.

2 Q. Okay. Are you a U.S. citizen?

3 A. Yes.

4 Q. How long have you lived in Nevada?

5 A. Since 19 -- 1999.

6 Q. And has that -- since 1999, have you lived
7 in Las Vegas?

8 A. Yes.

9 Q. Okay. Has that been continuous?

10 A. Yes.

11 Q. Where did you live prior to Las Vegas?

12 A. Um, California.

13 Q. What made you move here?

14 A. Honestly, to open a dance studio. But then
15 got into the entertainment industry.

16 Q. Okay. So did you have prior dance training?

17 A. Yeah, my whole life.

18 Q. Okay. What kind of dance training?

19 A. Jazz, ballet, lyrical.

20 Q. Wow.

21 A. Tap. Everything else.

22 Q. Did the training help you become an
23 entertainer?

24 A. One thing has nothing to do with the other.

25 Q. How so?

1 A. One was about money, and the other one was
2 about love.

3 Q. Okay. Now, prior to Crazy Horse III, did
4 you perform at any other gentleman's clubs or adult
5 venues?

6 A. Yes.

7 Q. Where?

8 A. Olympic Gardens.

9 Q. Okay.

10 A. Treasures.

11 Q. Do you have approximate dates when you
12 performed at those --

13 A. Not at this time.

14 Q. Okay.

15 A. Not that I can remember.

16 Q. Do you recall when you first went to Crazy
17 Horse to audition or check it out?

18 A. When they -- I'm not sure on the date when
19 they opened, but it was when they were opening.

20 Q. Okay. Do you have a --

21 A. Like a -- when they bought over the other
22 place.

23 Q. Okay. Do you have a year?

24 A. I don't -- I don't know. Sorry.

25 Q. That's okay. And just so you know, if you

1 think of a date later on, as we go through, some of
2 this might refresh your memory.

3 A. Uh-huh.

4 Q. Obviously, it was a while ago.

5 A. Yeah.

6 Q. That's all right. You can chime in.

7 What made you choose to go into Crazy Horse
8 III?

9 A. Because I got let go from another club.

10 Q. Why did you get let go?

11 A. No idea.

12 Q. When you say let go, I mean, what --

13 A. Um --

14 Q. -- do you mean?

15 A. Well, they like to control your situation.

16 So they don't -- they just say well, you have to work
17 on the day shift or you can't work here.

18 And there was never a reason. I always felt
19 bullied in the clubs that I worked at.

20 Q. Okay. And do you recall what that last club
21 was right before Crazy Horse?

22 A. Um, it was probably Olympic Gardens, because
23 I've gotten hired and rehired there so many times.

24 Q. Okay.

25 A. So --

1 Q. So had you --

2 A. -- it could have been a mixture with
3 Treasures, kind of going back and forth.

4 Q. Okay. So when you first went to Crazy
5 Horse, can you describe to me your first visit?

6 A. Um, rephrase the question?

7 Q. Did you audition?

8 A. Um, most likely, I did.

9 Q. Okay. How would that occur? Would you go
10 in and ask to see a manager or say --

11 A. Yes.

12 Q. What would you say?

13 A. I would go -- ask to see a manager, and they
14 would make you stand humiliate -- humiliation on
15 stage, standing there so they can stare at you.

16 Q. Okay. Do you recall if you had to do any
17 performing?

18 A. Just kind of stand there and dance around to
19 a song.

20 Q. Okay. All right. So do you recall a
21 specific manager that you might have met with at Crazy
22 Horse?

23 THE WITNESS: Keith, is that his name, the
24 manager? I can't remember a name.

25 MS. CALVERT: Who you auditioned for?

1 THE WITNESS: Um, well, no, I don't remember
2 who I auditioned for, but that's --

3 MS. SMITH: Okay.

4 THE WITNESS: -- the one manager I know
5 that -- that I had problems with over there.

6 Q. (BY MS. SMITH) Okay. So we'll go -- we'll
7 come back to that.

8 A. Uh-huh. I don't remember people's names
9 pretty much.

10 Q. Okay. So you don't recall if you --

11 A. Not a specific person that auditioned me,
12 no.

13 Q. Okay. Okay. That's fine. It was a while
14 ago.

15 And then do you recall when you stopped
16 performing at Crazy Horse?

17 A. Um, not the exact date.

18 Q. Okay. Do you have a year?

19 A. I don't recall.

20 Q. Did you review any documents prior to
21 coming --

22 A. Yeah.

23 Q. -- in for your --

24 A. I just --

25 Q. -- deposition?

1 A. I'm just blank right now. Can I ask my
2 lawyer?

3 MS. CALVERT: She'll show you --

4 MS. SMITH: No, we'll -- we'll get into
5 that --

6 THE WITNESS: I mean, I worked --

7 (The court reporter asked for one
8 person to speak at a time.)

9 Q. (BY MS. SMITH) So during the deposition,
10 you might have some questions. It's likely that we'll
11 circle back around.

12 In terms of asking your attorney for
13 information, that's -- I don't want to give you legal
14 advice, but I'll let her handle that.

15 MS. CALVERT: Yeah. Just answer to the best
16 you can. If you don't know something, it's okay to
17 not know and -- yeah.

18 We might circle back around, but they don't
19 want me feeding you any answers.

20 THE WITNESS: Okay.

21 MS. SMITH: And don't worry about it, you
22 know --

23 THE WITNESS: I'm just --

24 MS. SMITH: -- we're --

25 THE WITNESS: I'm trying to think. I'm

1 sorry. I'm trying to think of that date that -- that
2 last time.

3 MS. SMITH: No need to apologize. You know,
4 Lauren and I will circle back around at --

5 THE WITNESS: It could --

6 MS. SMITH: -- some --

7 THE WITNESS: -- have been --

8 MS. SMITH: -- point.

9 THE WITNESS: It could have been 2007 or
10 2009, one of those two. It's sticking in my head for
11 some reason.

12 Q. (BY MS. SMITH) Okay. All right. After you
13 stopped performing -- or I should say after the last
14 time you performed at Crazy Horse, did you perform at
15 any clubs or venues?

16 A. Yes.

17 Q. Where?

18 A. Went back to Olympic Gardens.

19 Q. Okay. So had they previously let you go,
20 Olympic Gardens?

21 A. Yes.

22 Q. Okay. And then how did you go about
23 re-contacting them?

24 A. Um, just going in and talking to a different
25 manager.

1 Q. Okay. Coming back to Crazy Horse, so when
2 you first started dancing there, did you agree to be
3 an independent contractor?

4 A. They didn't give me a choice.

5 Q. Did you ask to be an employee?

6 A. They didn't give that option.

7 Q. But did you ask to be one?

8 A. No.

9 Q. Okay. Why is that?

10 A. Um, because I know the dance industry. And
11 that's -- when you go in, you work for tips and --
12 that's how the industry is.

13 Q. Okay. About how long had you danced in
14 clubs such as Crazy Horse prior to going to Crazy
15 Horse?

16 A. 1999.

17 Q. What's your understanding of what an
18 independent contractor is?

19 A. I'm not a lawyer. I don't know their
20 details of the two. I just know that one, you have
21 benefits, and one, you don't.

22 Q. Okay. That's -- so that would be your
23 definition of an independent contractor versus an
24 employee?

25 A. That -- to my knowledge of that's what it

1 is, because I'm not -- I don't know the logistics of
2 it all.

3 Q. Okay.

4 A. I don't know their -- their logistics.

5 Q. Have you been an employee of a company --

6 A. No.

7 Q. -- ever?

8 A. Yes. You mean a dance company?

9 Q. An employee of any kind of business.

10 A. Yes. I'm an employee of some -- of a
11 business now.

12 Q. What business is that?

13 A. I work for Closet World.

14 Q. Okay. What about prior to Closet World?

15 A. No.

16 Q. So nothing --

17 A. Not for --

18 Q. -- prior --

19 A. -- a long time.

20 Q. Okay. All right. So commencing in 1999, is
21 that when you started as a private contractor,
22 independent contractor?

23 A. Yes.

24 Q. Okay.

25 A. On and off for years. I will say that. It

1 wasn't ever consistent.

2 Q. Okay. Did you -- what requirements did you
3 have to fulfill to be an independent contractor?

4 A. Um --

5 MS. CALVERT: Objection --

6 THE WITNESS: I don't --

7 MS. CALVERT: -- to form.

8 THE WITNESS: Yeah, I don't understand.

9 Q. (BY MS. SMITH) All right. Did you have to
10 have a sheriff's card?

11 A. Um, yes.

12 Q. Okay.

13 A. I remember being -- way back then, no,
14 but -- when I started, no. But as the years went by,
15 yes.

16 Q. So once you knew that there was a
17 requirement to have a sheriff's card, did you obtain a
18 sheriff's card?

19 A. Yes.

20 Q. Okay. Did you have a sheriff's card prior
21 to coming in to audition for Crazy Horse?

22 A. Yes.

23 Q. Okay. What about a Nevada business license?

24 A. Um, when it was supposed to be required, I
25 had to get one, yes --

1 Q. Okay.

2 A. -- to work.

3 Q. So once it -- so when you very first started
4 dancing --

5 A. They didn't --

6 Q. -- it was --

7 A. -- require it.

8 Q. -- not a requirement. But you found out it
9 was a requirement, then you went and obtained it?

10 A. Yes.

11 Q. Okay. And you would -- would you keep your
12 sheriff's card in good standing?

13 A. Yes.

14 Q. What about your business license?

15 A. Yes.

16 Q. What would you have to do to renew your
17 sheriff's card?

18 A. Go to the sheriff's office and renew it
19 there --

20 Q. Okay.

21 A. -- pay for it, and go through their process.

22 Q. What about the business license?

23 A. Same thing.

24 Q. Okay. Do you recall the fees you paid for
25 the sheriff's card?

1 A. It changed over the years. But I think the
2 last time was about 70 something dollars.

3 Q. Okay.

4 A. Something like that.

5 Q. What about the business license?

6 A. Those are 200. And if you're late, they're
7 300, even if you're one day late, which has happened a
8 couple times --

9 Q. Okay.

10 A. -- over the years. Because I'll stop
11 dancing, and then it will be over the month, and I'll
12 be like -- (Witness snapping fingers) -- I got to pay
13 an extra hundred, you know.

14 Q. Right.

15 A. Yeah.

16 Q. Okay. In terms of your business license,
17 did you have that prior to auditioning at Crazy Horse?

18 A. Yes.

19 Q. Do you still have a business license?

20 A. No.

21 Q. Why not --

22 A. Not that's valid -- not that's up to date,
23 no.

24 Q. So an expired one?

25 A. Yes.

1 Q. Okay. And when did that expire, do you
2 know?

3 A. Um, last March.

4 Q. So March of --

5 A. 2000 --

6 Q. -- 16?

7 A. -- 15 -- 15. 2015.

8 Q. I'm like --

9 A. Sorry.

10 Q. Okay.

11 A. Oh, yeah. Two year. Yeah. Forgot it's
12 January. Sorry.

13 Q. Easy to do.

14 A. Uh-huh.

15 Q. Okay. What kind of business license did you
16 have?

17 A. Um, individual.

18 Q. Okay. During the time that -- okay. So
19 while you were performing at Crazy Horse, did you
20 perform at any other clubs?

21 A. Um, no.

22 Q. Why is that?

23 A. Um, because I'm a single mom, and I have
24 other responsibilities.

25 Q. Okay. If you had chosen to, could you have

1 performed at different clubs?

2 A. I honestly don't recall if that was Crazy
3 Horse's rule or not.

4 Q. Okay. So you don't recall ever let's say
5 working -- or performing during a shift at Crazy Horse
6 and then performing at another club --

7 A. No.

8 Q. -- that might be busier?

9 A. No.

10 Q. Anything like that?

11 A. Huh-uh.

12 Q. Okay.

13 A. I can only handle one at a time. Thank you.

14 Q. Fair enough. Can you explain to -- okay.
15 Sorry. That was a bad question.

16 So when you were performing at Crazy Horse,
17 did it have a bar?

18 A. Yes.

19 Q. What about served food?

20 A. Um, at one time, they did, and then they
21 stopped.

22 Q. Okay.

23 A. But when I first started, they did.

24 Q. Okay.

25 A. And then they didn't.

1 Q. Okay.

2 A. You can order food in, but that was --

3 Q. So --

4 A. -- it.

5 Q. -- whenever you stopped performing, they
6 stopped -- at that point in time, they were not
7 serving?

8 A. Right.

9 Q. Okay. What about TVs, did they have TVs?

10 A. Yeah.

11 Q. Okay. Would they host any parties or
12 anything to that effect?

13 A. Yes.

14 Q. Okay. Were you required to attend those?

15 A. Yes.

16 Q. Who required you?

17 A. Managers.

18 Q. Do you know any manager that --

19 A. Keith was the main manager there at the
20 time.

21 Q. So when I say require, I mean mandatory,
22 within the rules.

23 Does that make sense?

24 A. I don't know with -- within the paperwork
25 rules. But they said if you don't come, you can't

1 work here anymore.

2 Q. And you believe that Keith told you that?
3 Or just managers in general?

4 A. The managers in general. Keith was in
5 charge, so --

6 Q. Okay. Did you ever ask not to be able to
7 attend the parties?

8 A. Uh, yeah, actually.

9 Q. And what would occur?

10 A. You have to be here, just like meetings. If
11 there were meetings, you have to be there.

12 Q. Okay. What -- okay. So what if you were
13 sick for one of these parties?

14 MS. CALVERT: Objection. Calls for
15 speculation. You can go ahead and answer.

16 THE WITNESS: Um, I'm sure that that would
17 have been okay, if I was sick.

18 Q. (BY MS. SMITH) Okay. Let's go -- were
19 these parties on premises?

20 A. Yes.

21 Q. Did you have to report to anyone when you
22 attended --

23 A. Yes.

24 Q. -- the party?

25 A. Yes. You have to check in and pay.

1 Q. Okay. When you said check in and pay, is
2 that for every shift?

3 A. The house fees of the shift that you're on,
4 yes.

5 Q. Okay. So then was there a separate party
6 fee?

7 A. No.

8 Q. Okay. So once you would show up, you would
9 check in, you would pay a house fee?

10 A. Yes.

11 Q. Is that correct?

12 A. Yes.

13 Q. Okay. Do you know how much that was?

14 A. I don't recall. It was different any night
15 you worked.

16 Q. Okay. So for these parties, were they
17 mandatory for every entertainer who performed at the
18 club?

19 A. I have no idea. I can only speak for
20 myself.

21 Q. Okay. So you -- you felt that they were
22 mandatory for you?

23 A. Yes.

24 Q. Okay. And the only response you received
25 after you asked to be excused from a party was what?

1 A. I didn't ask to be excused from the party.

2 Q. You never did?

3 A. No. I -- I felt like it was something I had
4 to do or I'd be fired. That's how I felt. I always
5 felt that way, in every club I ever worked at.

6 Like bullied, as I said. I always felt that
7 way. You have to do what they say, wear what they
8 say, come in and go when they say.

9 Otherwise, you're let go.

10 Q. Okay. And when you say let go, what do you
11 mean by that?

12 A. Fired. You can't work here anymore.

13 Q. Would you have the opportunity to go and
14 re-audition for them?

15 A. No. Not usually.

16 Q. What about --

17 A. Not for --

18 Q. -- Crazy --

19 A. -- that.

20 Q. -- Horse?

21 A. Well, I'm talking about Crazy Horse. Crazy
22 Horse was one of the only ones where I have tried to
23 work again, and he turned me down every time.

24 And it was Keith every time.

25 Q. Okay. What days did you try to dance again

1 at Crazy Horse?

2 A. I don't recall the day I went in. Are you
3 talking about -- can you rephrase the question?

4 Q. Okay. Well, you said that -- okay. So at
5 some point -- we'll circle back around to the year.

6 You gave your last performance at Crazy
7 Horse; correct?

8 A. Okay.

9 Q. So maybe it was 2007, maybe it was 2009.

10 A. Yeah.

11 Q. But at some point, it stopped.

12 A. Right.

13 Q. Okay? So after that, did you go back to
14 Crazy Horse --

15 A. Yes.

16 Q. -- to attempt to re-audition?

17 A. Yes. Like probably after I got fired again
18 from Olympic Gardens -- or let go, I'm going to say.

19 And then I went back there to see if he
20 would rehire me or a manager would rehire me.

21 And I will go into say that I don't remember
22 which manager. However, he -- Keith had said to me
23 call me in a couple days or come back, and I'll let
24 you know.

25 So I came back, and he said sorry, they said

1 no. Don't know who they are.

2 Q. Okay. And you don't know what year that
3 was?

4 A. Um, I would say 2012, maybe 2013, around the
5 end of the year maybe of 2012, beginning of 2013.

6 Q. Why did you stop performing at Crazy Horse
7 originally?

8 A. Who knows. They never gave me a reason.
9 They would just -- I would go in to check in, and they
10 say sorry, you can't work.

11 They say there's notes that says you can't
12 work. And I would say why, and they would say you
13 have to go talk to a manager.

14 Q. So Crazy Horse was -- you -- so walk me
15 through that.

16 So you had given your last performance. You
17 went back in on a subsequent day. How long after --

18 A. Like --

19 Q. -- do you --

20 A. -- what --

21 Q. -- know?

22 A. Whatever. The next day, two days later,
23 whatever I decided to go back in to work.

24 Q. Okay.

25 A. And I would go to check in, and they would

1 tell me oh, you can't work until you talk to a
2 manager.

3 So I'd have to seek out a manager or wait
4 hours for a manager to show up. Because if I came in
5 earlier --

6 Q. Uh-huh.

7 A. -- and the manager didn't get there till
8 9:00 or 10:00, I had to wait. And then I would wait
9 all that time, and then they come in and not give me a
10 clear answer.

11 Q. Okay. So this specifically happened at
12 Crazy Horse.

13 A. Yes.

14 Q. Okay.

15 A. That's what we're talking about, this --
16 this club here, so yes.

17 Q. Just want to make sure because --

18 A. Yep.

19 Q. -- sometimes you make references to --

20 A. It --

21 Q. -- you know, other clubs or all the clubs.
22 So I just want to make sure that we're --

23 A. Well --

24 Q. -- clear that's this is directly with Crazy
25 Horse.

1 A. I am directing it towards Crazy Horse,
2 unless you asked me something different from another
3 club, which is -- everything I've said so far is about
4 Crazy Horse, unless you've asked me back.

5 Q. Fair enough. Just want to have a clear
6 record --

7 A. Yes.

8 Q. -- later on when Lauren and I are ready
9 to --

10 A. Yeah.

11 Q. Okay. Let's go back to your original
12 audition.

13 A. Uh-huh.

14 Q. Were you assigned specific hours to be there
15 or a specific shift?

16 A. No.

17 Q. Okay. So you could come in and dance any
18 time, day or night?

19 A. Yes. But there was a required hour you had
20 to be there, like required hours you had to be there.

21 Q. Can you clarify what you mean by that?

22 A. Have to work at least six hours.

23 Q. What would happen if you did not work --
24 perform for at least six hours?

25 A. You have to check in with the manager to see

1 if you can leave early. And then tip out the DJ to
2 get a card to bring back to the back room -- back door
3 to check out.

4 Q. Okay. Did you ever try to check out prior
5 to the end of six hours?

6 A. Most of the time.

7 Q. Okay. Did a manager ever deny you the
8 ability to --

9 A. A couple times.

10 Q. Did they tell you why?

11 A. No.

12 Q. Okay. Would you go and re-ask?

13 A. Um, usually not. Because they would
14 probably say no.

15 Q. Would you report that to anyone?

16 A. Who am I going to report it to?

17 Q. Other manager?

18 A. No.

19 Q. Higher up manager?

20 A. He's the highest.

21 Q. Any reason?

22 A. Um, the same thing I said before about
23 when -- you know, when you have a job like that and
24 they're telling you what you can wear and what you can
25 do and when you can work, you kind of don't want to

1 step on toes so you're not let go.

2 Q. Okay. So --

3 A. Again --

4 Q. -- aside from -- aside from once you checked
5 in, you said that you needed to be there six hours; is
6 that correct?

7 A. Yes. That was required for that club.

8 Q. Okay.

9 A. They do let you go early, obviously. But
10 you have to ask. And it matters on how many people
11 are there, how many girls are there.

12 Q. Okay.

13 A. (Witness nodding head.)

14 Q. You said you had to tip out the DJ. Was
15 that a requirement by management?

16 A. It's a requirement, period.

17 Q. What do you mean by requirement, period?

18 A. Um, whether you pay to get off stage, which
19 I did most of the time, you still had to tip somebody
20 when you left.

21 And if you didn't, there was attitude
22 brought on you, whether -- if you didn't -- if you did
23 dance on stage and you didn't tip, same situation.

24 So I -- I paid extra not to dance on stage,
25 which made it a little diff -- more difficult to leave

1 early.

2 Q. Okay. So would you say that was a mandatory
3 rule versus an expectation?

4 A. For who?

5 Q. For you to tip out individuals.

6 A. It's just -- I don't know.

7 Q. Did you ever not tip out an individual?

8 A. Yes.

9 Q. And what would occur?

10 A. Well, if I didn't make money, I can't tip
11 out with something I don't have. So they would have
12 to understand.

13 Q. Okay. Would you get in -- would you be
14 disciplined for that?

15 A. Of course.

16 Q. By who?

17 A. Managers.

18 Q. What would the discipline be?

19 A. They just tell you you have to start tipping
20 or you can't work here.

21 Q. Okay. Okay. So other than -- so you said
22 you could choose what time to start performing in a
23 day.

24 A. Well, sort of. And the way I'll answer that
25 is that I will say every club is different. However,

1 some clubs have shifts, and -- and they all they all
2 have shifts.

3 So they either write on your paperwork any
4 time or night shift or morning shift.

5 So at one time, I was a morning -- I was
6 at -- I was at any time shift. Then they changed me
7 to a different shift --

8 Q. Okay.

9 A. -- before they let me go. Which obviously
10 was something that I couldn't do because I'm -- have
11 kids.

12 Q. Do you know what years you were assigned --
13 I'm sorry, you said any time shift?

14 A. It was when I first got hired there --

15 Q. Okay. And --

16 A. -- whenever --

17 Q. -- then --

18 A. -- that was.

19 Q. Do you know what year you were changed to a
20 day shift?

21 A. It wasn't a year. It was just
22 circumstantial.

23 I don't know what year it was or how --
24 when -- when I was back the second time or the third
25 time kind of thing.

1 Q. When you say you were back the --

2 A. Meaning --

3 Q. -- second --

4 A. -- that --

5 Q. -- time --

6 A. -- I took --

7 Q. -- or third --

8 A. -- time --

9 Q. -- time --

10 A. -- off, and then I came back. Not because
11 they let me go, just because I had my kid or something
12 was going on, and I needed some time off.

13 Q. Okay.

14 A. They allow you to do that. But then you
15 have to re -- not a re-audition, but, you know, they
16 kind of inactivate you.

17 So you have to ask the manager to be
18 reactivated.

19 Q. Okay. Okay. So during the -- when you were
20 assigned to any time, you could just select any time
21 of day or night to begin performing?

22 A. Yes.

23 Q. Okay. And when you were -- eventually were
24 assigned to day shift, what hours would that entail?

25 A. Um, any time of day, like 11:00 to whenever

1 their day shift ended. I don't recall.

2 Q. You mean 11:00 a.m.?

3 A. Yeah.

4 Q. Okay. So --

5 A. I can't remember. Sorry. I'm just trying
6 to think if that was the club that did that 24 hours.

7 Q. Okay.

8 A. So --

9 Q. Okay. So within that -- let's just
10 hypothetically say you were day shift, and day shift
11 was from 11:00 a.m. to 8:00 p.m.

12 I don't know. I'm not saying that those are
13 the actual hours.

14 A. Right. Sounds right though.

15 Q. But you could choose to come in any time to
16 start performing between that 11:00 a.m. and 8:00 p.m.
17 window?

18 A. No. You have to come within the two hour
19 from when -- the -- the two-hour mark.

20 If it's 11:00, you have to be there before
21 like 12:00 o'clock or 1:00 o'clock to work your six
22 hours.

23 Because you can't work past their time frame.
24 It's a cutoff. So they can't -- so unless you're
25 making money and in the VIP room, they tell you you

1 have to leave because your shift is over.

2 Q. Who tells you that they --

3 A. The manager does.

4 Q. Okay.

5 A. A manager will either seek you out or a
6 house mom will seek you out and tell you that you need
7 to leave.

8 Q. Okay.

9 A. Or you have to pay another house fee, but
10 you have to get permission for that.

11 Q. Okay. Could you choose what days that you
12 came in to perform?

13 A. Yes.

14 Q. Okay. So if you wanted to perform seven
15 days in a row, could you do that?

16 A. Yes. I never did.

17 Q. Okay.

18 A. Back there, I don't -- I can't do day
19 shifts, so -- to me that's like firing me.

20 Q. Well, when I say day, I mean, could -- seven
21 weekdays.

22 A. Oh, of course.

23 Q. Okay.

24 A. Yeah. You can go work whenever you want, as
25 long as you pay your house fee.

1 Q. Okay. And if you didn't want to come in for
2 any shifts at all in a two-week period, what would
3 happen?

4 A. Um, okay, so every club is different. I
5 don't know when they inactivate people.

6 But they would inactivate you if you didn't
7 show up for at least a month, I'm assuming, for
8 that --

9 Q. Okay.

10 A. -- but I don't know.

11 Q. So for Crazy Horse, you're saying a month?

12 A. Yeah, around there, I'm assuming. I don't
13 re -- I don't know, because I didn't ask them.

14 I just know when I took time off and I came
15 back, I had to always be reactivated.

16 Q. Okay. I'm just going to take a moment to
17 try and ask you to narrow your answers specifically
18 to --

19 A. Sure.

20 Q. -- Crazy Horse, because you do mention other
21 clubs.

22 A. Okay.

23 Q. And I think it's becoming a little bit
24 convoluted when you say, you know, all the clubs or
25 these other clubs --

1 A. Okay.

2 Q. -- versus just Crazy Horse. I know you've
3 said just Crazy Horse, but going back, you know,
4 people might be reading this months from now.

5 So just to try and keep it a little bit --

6 A. Okay.

7 Q. -- clearer. But it's okay.

8 A. Uh-huh.

9 Q. Doing good. Okay. So you're -- you were
10 assuming that you would have to come in and perform
11 for at least one shift within 30 days to stay
12 active --

13 A. Yes.

14 Q. -- is that correct?

15 A. Yes.

16 Q. And if you went inactive, what would occur
17 at Crazy Horse?

18 A. You have to have -- talk to a manager to --
19 to get re -- they have to put in their code to
20 reactivate you.

21 Q. Okay. So if you wanted to stop performing
22 prior to the end of six hours, aside from -- when you
23 say check out with a manager, do you mean just get
24 his -- what do you mean by that?

25 A. Just can I leave early. What's the reason.

1 Q. Okay.

2 A. Yes, you can. Go to the DJ or check out
3 with the DJ.

4 If I paid off-stage fee, then you just check
5 out with the DJ and get a paper and bring it to the
6 front.

7 Q. Okay.

8 A. And then you leave.

9 Q. So aside from you tipping out the DJ at
10 the -- whenever you had chosen to leave, would you tip
11 out any other persons at the club?

12 A. Uh, if I'm in the VIP room, I'm required to
13 tip when I leave the VIP room.

14 Q. Who would you be required to tip?

15 A. The person that's checking people in.

16 Q. Okay. And what was the amount of --

17 A. It varied.

18 Q. Can you give me a range?

19 A. I prefer not to. There is no range really.
20 Okay, let's -- okay, I'll give you a range. Ten
21 percent. How about that?

22 Q. Okay.

23 A. Ten percent of what you made.

24 Q. Okay. All right. So once Crazy Horse said
25 they wanted you to perform during the day, did you ask

1 to be put on a different shift?

2 A. I asked why, and they didn't give me an
3 answer. And that was pretty much the end of my job
4 there.

5 Q. Okay. So aside from asking why they had
6 assigned you to day shift, did you ask them to keep
7 you on any time?

8 A. Of course.

9 Q. And what was their response?

10 A. No.

11 Q. Okay. So then whose choice was it for you
12 to stop performing at Crazy Horse?

13 A. Okay, so I'm going to just step back one
14 more time. There's been two times I've worked
15 there --

16 Q. Okay.

17 A. -- besides the third time I went to go get
18 rehired and they didn't.

19 So the first time, they had put me on the
20 day shift.

21 The second time, a year or so later, that's
22 when I went in to go check in and I wasn't allowed to
23 work.

24 And I had no prior day before saying you
25 can't work tomorrow.

1 Q. Okay. Let me -- let me -- I think that it's
2 gotten a little convoluted.

3 So when you first went in to audition at
4 Crazy Horse, what shift were you assigned to?

5 A. Any time.

6 Q. Okay. And so for a while, you were allowed
7 to come in and perform at any time during the day or
8 night.

9 A. Well, any time shift really meant any time
10 shift. So whenever you wanted to come in.

11 Q. Okay.

12 A. They didn't ask you to leave.

13 Q. Okay. And then after -- at some point, you
14 stopped being an any time shift person --

15 A. Yes.

16 Q. -- is that correct?

17 A. Uh-huh.

18 Q. Do you know when that happened?

19 A. I don't know the exact date.

20 Q. Do you have a year estimate?

21 A. Don't know the exact year.

22 Q. Okay.

23 A. I'm going to say one thing. This can go on
24 record. I -- I have been back and forth to these
25 clubs so many times.

1 So it's hard, when you don't ask me a
2 specific time frame, I don't know what -- what to
3 answer you.

4 So I'm sorry if I sound confusing. But as I
5 said, it's very hard to answer specific questions that
6 you're asking unless you give me the year I was there
7 that you have in your notes.

8 Q. Okay.

9 A. Yeah.

10 Q. Let me hand you this, and hopefully that
11 will help us clear up the timeline. Well, I think
12 I'll hand you that.

13 Okay. I have a one-page log-in. On the
14 top, it says CH3LV, entertainer log-in by date.

15 MS. SMITH: We'll mark this as Exhibit A.

16 (Defendant's Exhibit A was marked for
17 identification.)

18 Q. (BY MS. SMITH) I believe this is Bates
19 stamped RR0610. I think it was previously produced in
20 an Excel spread sheet to your counsel.

21 Have you seen this document before?

22 A. Yeah. But there's more to this too. I'm
23 aware of that, but I'm just saying that there's other
24 years I've been there too, besides this year --

25 Q. Okay.

1 A. -- on 2011, I've been there other years,
2 that I know that you have copies of.

3 Q. What do you mean by you know that I have
4 copies of?

5 A. Well, if you have copies of everything, then
6 you should have other Crazy Horse III dates.

7 Q. Okay. I'm going to show you this. I'm not
8 going to attach it, because it does have your full
9 Social Security number on it.

10 This is Bates stamped RR0083 through RR0084.
11 It reflects a stage name of Carrie Jo. Is that --

12 A. Uh-huh.

13 Q. -- your stage name?

14 A. Uh-huh.

15 Q. How did you select that?

16 A. Um, I don't know what this is. I don't know
17 what this is.

18 Q. That was a document produced in this
19 litigation --

20 A. Oh.

21 Q. -- reflecting information that --

22 A. That's just information about me.

23 Q. Okay. Is that information correct?

24 A. Yes.

25 Q. Okay. Do you think that that spot that says

1 hire date on it, do you think that that is a correct
2 date for when you first auditioned?

3 A. Yeah.

4 Q. Okay. So --

5 A. This is -- this is why I say, there's a lot
6 of different years and dates here that I have
7 performed there.

8 Q. Okay.

9 A. So --

10 Q. I understand that.

11 A. Yeah, it's like it wasn't consistent from
12 2005 to 2000 -- so when you asked me before when I
13 was -- when I -- the last time I worked there, I
14 believe it was 2007.

15 And I was maybe hired here, but I was -- and
16 then I came back here. So that's why I'm --

17 Q. Okay.

18 A. That's why those --

19 Q. That's why I'm going to -- I know that there
20 isn't, you know, documents showing maybe everything
21 you think that you like performed during.

22 A. Uh-huh.

23 Q. But do you think that that 2005 date is an
24 accurate date that you auditioned?

25 A. It's been so long. I'm assuming so.

1 Q. Do you --

2 A. It's been a long time though, so --

3 Q. Right. Do you have any reason to doubt
4 the --

5 A. No.

6 Q. -- veracity of that document?

7 A. No.

8 Q. Okay.

9 A. I'm assuming that if that's when they
10 opened, then that's probably when I first got hired
11 there.

12 Q. Okay. So in 2005 then, you would have been
13 assigned the any time --

14 A. Yeah.

15 Q. -- shift?

16 A. Uh-huh.

17 Q. Okay. So how long of a period do you think
18 you performed there after you first auditioned in
19 2005?

20 A. Hon --

21 Q. Do you think it was that 2007 or 2009?

22 A. Honestly, I just -- I don't remember. I --
23 I never worked at the club -- for any of the clubs
24 really long anyway.

25 So whether it was Crazy Horse, and I worked

1 there from 2005 to 2007 and then stopped, and then came
2 back in 2010 or whatever, I -- I just -- as I said, I
3 don't recall the exact dates, so --

4 Q. Okay. So let's just call it the first
5 stretch, whatever that time period is --

6 A. Okay.

7 Q. -- from 2005 to 2007.

8 A. Sure.

9 Q. During that first stretch, were you on any
10 time shift?

11 A. At first, yes.

12 Q. Okay. And then at some point during that
13 first stretch, did you get switched from any time to a
14 different shift?

15 A. To the daytime shift.

16 Q. Okay.

17 A. Which was an option of being on the daytime
18 shift or not working there, which is what the manager
19 has said to me.

20 Q. And you don't recall which manager?

21 A. No, I don't.

22 Q. Okay.

23 A. But it all goes down -- it all comes down to
24 Keith's decision. So whether a manager says
25 something, that manager gets information from Keith.

1 Q. How do you know that?

2 A. Because I just know that.

3 Q. Okay.

4 A. Any -- any club -- any club in this town has
5 a main manager. And that main manager makes the final
6 decision on anything.

7 A -- a manager on the floor is called a
8 manager, but they're actually floor managers. They're
9 not actual managers.

10 Q. Okay. Okay. So did a floor manager tell
11 you that you had to be on day shift or not work there?

12 A. Yes.

13 Q. Okay. Did you go and speak to Keith?

14 A. Yes.

15 Q. And what was the response?

16 A. I don't have to answer that question.

17 Q. Okay.

18 A. That's what he said, not me. That's what he
19 said.

20 Q. Okay.

21 A. I don't have to answer that question, is his
22 response.

23 Q. Okay. And you don't -- this was at the end
24 of the first stretch of you --

25 A. Yes.

1 Q. Okay. So then what did you do?

2 A. Went to a different club.

3 Q. Okay. Did you tell anyone at Crazy Horse
4 that you weren't coming back to perform during the
5 day?

6 A. No.

7 Q. Okay. So then after the first stretch,
8 after you had gone to perform at a different club, do
9 you recall when you came back to Crazy Horse?

10 A. Um, I'm going to have to assume that -- if I
11 have to say a date, it's probably going to be around
12 this 2010 spot.

13 Q. Okay.

14 A. 2010, 2011 spot here.

15 Q. Okay. So you think that this is an accurate
16 reflection at least of your 2011 performances?

17 A. Yeah. There was earlier dates, I'm
18 assuming -- I remember seeing on the Crazy Horse -- on
19 my -- on my sheets for -- for other tax reasons or
20 whatever.

21 It's -- there -- I -- that's why this 2007
22 is sticking to me or 2009. I'm not sure.

23 Q. Okay.

24 A. This one just says 2011, but I know I worked
25 here more than this many days.

1 Q. In 2011 or --

2 A. Yeah --

3 Q. -- in other --

4 A. -- in the --

5 Q. -- years?

6 A. -- stretch or 2010, '11.

7 Q. Okay. Okay. So whenever you came back in
8 what you believe to be 2010 or 2011 --

9 A. Uh-huh.

10 Q. -- explain to me what process you went
11 through.

12 A. Um, same process. Have to get rehired, so
13 you have to re-audition. And I re-auditioned for
14 another manager.

15 Also a -- a limo driver -- don't remember
16 his name -- said let me take you over there and he'll
17 hire you because I'm friends with him and -- so that's
18 how I got rehired on that one.

19 Q. Okay. And then do you recall how long you
20 were there for that -- let's call it the second
21 stretch?

22 A. Probably till the end of this -- on here,
23 7 -- about the 2011, mid 2011.

24 Q. Did you perform at Crazy Horse after mid
25 2011?

1 A. No, I don't think so. I tried to get
2 rehired again though.

3 Q. But you don't know --

4 A. A couple --

5 Q. -- when?

6 A. -- of years ago. Um, well, right before I
7 actually quit dancing. So that would have been
8 probably beginning of 2015.

9 Or, you know, that was my last attempt to --
10 to go there before I went somewhere else for a very
11 short period and then ended my career.

12 Q. Did you like performing at Crazy Horse?

13 A. The money was nice.

14 Q. Okay. Is that why you tried to -- is that
15 why you re-auditioned for your second stretch?

16 A. Yeah.

17 Q. And what about returning after that?

18 A. It's all about the money.

19 Q. Okay. So that second stretch, let's call
20 it, 2011 --

21 A. Okay.

22 Q. -- why did you stop performing at Crazy
23 Horse then?

24 A. No idea. That's -- I walked in, saw -- they
25 said I -- I can't work the shift until I talk to a

1 manager.

2 And then Keith talked to me and said I'll
3 talk to the other people, managers, whatever, and let
4 you know in a couple days.

5 Came back, and he said sorry, you can't work
6 here. And he didn't give me another reason why.

7 I asked him repeatedly what did I do, what's
8 wrong with me, all those questions that you asked,
9 why.

10 Q. Okay.

11 A. Never did they say I did anything wrong.
12 They just wouldn't tell me why I couldn't work there.

13 Q. Okay. When you would go on a shift at Crazy
14 Horse, what would you say your goal was, your main
15 goal?

16 A. It varied.

17 Q. Can you give me examples of --

18 A. I'm not going to --

19 Q. -- that?

20 A. -- give a straight money answer, because
21 there is no straight money answer.

22 Q. What do you mean by a straight money answer?

23 A. You're asking me how much I'd make in a
24 specific shift; right?

25 Q. No. I'm just asking generally what your

1 goals were when you started a shift. Would it be to
2 talk to customers?

3 A. Oh, I thought you meant how -- my goal
4 money-wise. I'm sorry. You weren't clear. Sorry.

5 Q. No problem. That's --

6 A. Okay.

7 Q. -- you know, what asking the question is
8 for. So I mean, okay --

9 A. What was my goal.

10 Q. Yeah.

11 A. To -- to make money.

12 Q. Okay.

13 A. (Witness nodding head.)

14 Q. And you said you didn't have a specific
15 dollar amount that you would aim for?

16 A. Well, I think we all do. But it's --
17 it's -- I'm just going to work to see if I make money.
18 And that's pretty much how it was.

19 Q. Okay. How would you decide when to go in
20 and perform at Crazy Horse?

21 A. Um, I don't know, if I had a babysitter or I
22 felt like working.

23 Q. Okay.

24 A. Yeah. Or I needed to work because I had
25 bills.

1 Most of the time, it was a need, a -- a need
2 basis only, not a -- not a want to or, you know, I
3 have to, but it's just because I needed to.

4 Q. Okay. Would you try and search times when
5 you thought the club might be busier?

6 A. Oh, of course.

7 Q. And what times -- and what would you do to
8 do that?

9 A. Well, if there's a convention in town or --
10 I -- you know, it's -- you know, or just the weekends
11 or -- actually, honestly, I -- I liked working on the
12 off days than the on days.

13 Q. When you say off days, can you --

14 A. Meaning --

15 Q. -- identify --

16 A. -- when --

17 Q. -- that?

18 A. Meaning nothing going on. Because there was
19 too many girls when there was something going on or
20 the weekends. So I tried to --

21 Q. Okay.

22 A. -- stay away from that time frame most of
23 the time.

24 Q. So fair to say more girls may choose to come
25 in for a shift on a weekend --

1 A. Of --

2 Q. -- night?

3 A. -- course.

4 Q. Okay.

5 A. Yeah. I would maybe pick one weekend night,
6 and then the rest would be one or two days during the
7 week.

8 Q. Okay. All right. Did that have an effect
9 on the house fee that you --

10 A. Yes.

11 Q. -- paid?

12 A. Uh-huh.

13 Q. And what effect did that have?

14 A. Uh, weekend house fees were more expensive
15 than during the week fees. Time frame, shift, they
16 all changed.

17 Q. Okay. Would you try to get parties of local
18 people or visitors to come in and specifically see
19 you?

20 A. No.

21 Q. Okay. What about once you were in the club,
22 would you try and approach a group of customers?
23 What -- what -- can you ex --

24 A. I'm --

25 Q. Sorry.

1 A. -- going to --

2 Q. Explain to me what you do.

3 A. I'm going to make this short and sweet.

4 Okay?

5 Crazy Horse has managers who like to set up
6 certain girls.

7 And usually, it depends on if they're seeing
8 them -- I'm going to be nice and say that -- or
9 they're paying them. They always had specific girls.

10 So if you went to a group of people, they
11 usually shunned you away if you're not one of the
12 girls, in quotes.

13 And, um, they had a back door, which was
14 highly unfair, to have groups of guys go in there and
15 not let girls make their own decision to go back.

16 They always picked their girls. So that
17 definitely hinders on money.

18 Q. Okay. When you say it hinders on money,
19 what do you mean?

20 A. Well, if I'm not one of those girls that can
21 go back and try to make money, then I'm not making
22 money.

23 And the same girls are making money over and
24 over and over again.

25 Q. Okay. So you would not have access to any

1 customers?

2 A. I wouldn't have access of going back there
3 unless I was asked.

4 Q. When you say going back --

5 A. In the --

6 Q. -- there --

7 A. -- back room, in the back, where they
8 brought men in the back. They didn't come through the
9 front of the club.

10 They went straight to the back into the VIP
11 room. And the managers brought the girls that they
12 wanted in that room.

13 Q. Okay. Could you take customers to the VIP
14 area?

15 A. I could take customers from the front into
16 the back VIP, yes.

17 Q. So you had access to some customers.

18 A. Of course -- well, I had access to the club,
19 I mean, when I was in the club. But not in the back
20 with their separate door entrance.

21 Q. Did you have your own customer base?

22 A. No.

23 Q. Were there any individuals that would come
24 to Crazy Horse specifically to see you?

25 A. Once in a while.

1 Q. Okay. How would you contact those people?

2 A. Um, they would just come back and see if I
3 was working. I didn't contact them or they didn't
4 contact me.

5 Q. Okay. All right.

6 A. Just they would say, while I'm there, when
7 are you working again. Well, I'm working -- when do
8 you want me to work.

9 And I'll go into the shift when they want to
10 be there.

11 Q. Okay. But so would they contact --

12 A. No, no.

13 Q. -- you?

14 A. No. Just while I'm at the club, they would
15 say when are you working again. Well --

16 Q. Oh, okay.

17 A. -- I work --

18 Q. Okay.

19 A. -- on Sunday. Okay. Well, then I'll come
20 see you on Sunday.

21 Q. Okay.

22 A. That's how my repeat customer base --

23 Q. Did --

24 A. -- I never --

25 Q. -- you ever promote yourself as an adult

1 entertainer?

2 A. No.

3 Q. Or a dancer, I guess?

4 A. No.

5 Q. Okay.

6 A. Are you talking like business cards and
7 stuff?

8 Q. Anything, in any way, business card. What
9 about posting on social media?

10 A. Definitely not.

11 Q. What about text messages?

12 A. No.

13 Q. Phone calls?

14 A. No.

15 Q. Emails?

16 A. No.

17 Q. Okay. Did you ever date anyone that you met
18 at Crazy Horse?

19 A. Not there, no.

20 Q. Did you meet anyone that you -- that worked
21 at Crazy Horse?

22 A. No.

23 Q. And when I say worked, in that context, I
24 mean manager or --

25 A. Did I date --

1 Q. -- bartender --

2 A. -- anybody? No, I did not.

3 Q. Okay. At Crazy Horse --

4 A. No.

5 Q. -- no one -- okay. Would you try to sell
6 bottles to people that came into -- like bottles of
7 alcohol to people that came into Crazy Horse?

8 A. Yeah. That was part of the job. You make
9 sure you up-sell to make more money for the club. And
10 that, in turn, can make money for you.

11 Because you're in -- if you're in the VIP
12 room and you're selling a bottle, you're up-selling
13 yourself. You up-sell the club too.

14 Q. Okay.

15 A. Did you ever get rep -- anything for it, no.
16 I'm going to ask that -- answer that question. We
17 never got anything for that.

18 Q. If you sold --

19 A. (Witness shaking head.)

20 Q. -- a bottle, let's say.

21 A. Nope. We never got anything for that.

22 Q. And what about just in general, for going to
23 the VIP area?

24 A. Well, we get paid for what the customer
25 gives us.

1 Q. How would you -- could you negotiate with
2 the customer as to what they would pay you?

3 A. The guy at the front told him how much it
4 was.

5 Q. Which guy up front?

6 A. The host that was standing --

7 Q. Of the --

8 A. -- in the --

9 Q. -- VIP --

10 A. -- front.

11 Q. -- area?

12 A. Uh-huh.

13 Q. Okay. You didn't negotiate with any --

14 A. We weren't --

15 Q. -- individuals?

16 A. -- allowed to.

17 Q. Who didn't allow you to?

18 A. Managers.

19 Q. Did you ask if you can negotiate?

20 A. You can't. You can't go over-pricing, or
21 they reprimand you for it.

22 Q. Reprimand --

23 A. Meaning --

24 Q. -- you in what way?

25 A. Well, you either get fired for

1 over-charging, or -- I mean, that's just a general
2 rule that they give during meeting -- when they gave a
3 meeting.

4 Q. Okay. When you say meeting, what --

5 A. There was --

6 Q. -- do you mean?

7 A. -- some meetings that happened throughout
8 Crazy Horse III that you would have to attend.

9 And they would go over rules and the way you
10 have to dance, the way you have to look, the way you
11 have to wear your clothes, all that stuff.

12 Q. Okay. Did anyone require you to -- after
13 that, you said six hours, did anyone require you to
14 stay longer than that?

15 A. No.

16 Q. Okay. Was there any requirement by Crazy
17 Horse on you to work more than 40 hours in a week?

18 A. No.

19 Q. Okay. And nobody instructed you when to
20 commence a shift?

21 A. (No response.)

22 Q. Aside from your assigned time slot?

23 A. At the time of working?

24 Q. Yes.

25 A. No.

1 Q. Okay. Did you report any earnings to the
2 IRS from Crazy Horse?

3 A. Yes.

4 Q. Do you know what years?

5 A. Every year I do my taxes.

6 Q. Okay. So let's just say from 2005
7 continuously through 2011, did you file income taxes
8 with the IRS?

9 A. Yes.

10 Q. How did you file those?

11 A. Um --

12 MS. CALVERT: Objection. Vague.

13 Q. (BY MS. SMITH) Did -- okay. What -- sorry.
14 Let me clarify that.

15 A. Uh-huh.

16 Q. Did you file those as an individual?

17 A. Head of household.

18 Q. Okay. And what about any taxes related
19 specifically to your business license or running of
20 your business license?

21 A. I don't understand the question.

22 Q. Did you have to pay any taxes related to
23 your business license?

24 A. Uh, no.

25 Q. Okay.

1 A. Just pay for your business license.

2 Q. Okay. So when you filed your head of
3 household taxes, did you claim any deductions?

4 A. Yes.

5 Q. Would you take a standard deduction, or
6 would you itemize?

7 A. Um, I don't understand the question.

8 Q. Well, you said you took deductions. Can you
9 elaborate on that?

10 A. My children, daycare.

11 Q. Okay.

12 A. Um, some -- some outfits and makeup and
13 things that I have to buy for the job.

14 Q. Okay. Do you have those records?

15 A. Yes, I do.

16 Q. Can those be provided to your attorney?

17 A. They can be.

18 Q. Okay.

19 THE WITNESS: May I answer my daughter's
20 text, please, and go to the restroom?

21 MS. SMITH: Sure Let's take a --

22 THE WITNESS: She just got home --

23 MS. SMITH: Let's take a break.

24 THE WITNESS: -- from school, so --

25 (Discussion off the record.)

1 MS. SMITH: We can go off the record for a
2 few.

3 (Short recess taken.)

4 MS. SMITH: Okay. We can go back on.

5 All right, Ms. Allen. We just took a brief
6 break. Just so you know, your oath is still in
7 effect --

8 THE WITNESS: Yes.

9 MS. SMITH: -- going forward. And if we
10 break again, that will be in place until, you know,
11 the end of the day.

12 THE WITNESS: Of course.

13 MS. SMITH: Or the end of this deposition.

14 Q. (BY MS. SMITH) Okay. So let me go back.
15 Were you asked to provide income tax information to
16 your attorney?

17 A. Yes.

18 Q. Did you do that?

19 MS. CALVERT: Object on attorney/client
20 privilege.

21 MS. SMITH: Are you instructing her not to
22 answer?

23 MS. CALVERT: No, you can answer if you
24 know.

25 THE WITNESS: I don't know.

1 MS. CALVERT: I don't know if she knows.

2 Q. (BY MS. SMITH) You don't know if you --

3 A. No, no. I don't know if that's -- if I
4 can --

5 MS. CALVERT: Oh, you can answer if you
6 know.

7 THE WITNESS: Oh. Well, yes, I -- I gave
8 them.

9 Q. (BY MS. SMITH) Okay. All right. Do you
10 have any idea how much income you reported from Crazy
11 Horse?

12 A. No.

13 Q. Okay. Did you have insurance during the
14 periods that you performed at Crazy Horse?

15 A. What kind of insurance?

16 Q. Insurance related to your business license?

17 A. No.

18 Q. What about other personal insurance?

19 A. Um, I believe I had car insurance. And I'm
20 not sure if I had medical at that time.

21 Q. Did you ask for Crazy Horse to give you any
22 benefits?

23 A. No.

24 Q. Why not?

25 A. Because I know it's not part of -- that's

1 one of the things I know, that if you're an employee,
2 you get benefits. And if you're not, then you don't.

3 Q. Okay.

4 A. I already answered that --

5 Q. And did --

6 A. -- question.

7 Q. -- you -- and you didn't ask to be an
8 employee?

9 A. No. I already asked -- answered that
10 question --

11 Q. Okay.

12 A. -- no.

13 Q. On either stretch.

14 A. Either stretch.

15 Q. On Exhibit A -- so I'm sorry, you did
16 confirm that you -- that that was the last time you
17 believed you performed --

18 A. I believe --

19 Q. -- at Crazy --

20 A. -- so --

21 Q. -- Horse.

22 A. Uh-huh.

23 Q. Okay. All right. Just making sure that
24 was --

25 A. Yes.

1 Q. -- correct.

2 A. Uh-huh.

3 Q. Did you ever get any head shots or promo
4 shots --

5 A. No.

6 Q. -- taken?

7 A. (Witness shaking head.)

8 Q. Okay. Did you ever get any plastic surgery?

9 A. No.

10 Q. Any other cosmetic surgery?

11 A. During my stretch? I had my nose done when I
12 was 7 -- 18. I don't know.

13 Q. Okay. So that wasn't related to --

14 A. No.

15 Q. -- you being a dancer?

16 A. No.

17 Q. Okay.

18 A. I couldn't breathe, so that's why I did it.

19 Q. That would be an important thing.

20 (Noise interruption.)

21 MS. SMITH: Let's just wait for a sec. It
22 gets very loud sometimes.

23 THE WITNESS: It's okay.

24 Q. (BY MS. SMITH) When you came on for a shift
25 at Crazy Horse, what would you bring with you?

1 A. A bag of shoes and sheriff's card, business
2 license. Always had to have it on me. Um, outfit.
3 Um, usually like lipstick or gloss or something.
4 Makeup.

5 Q. Okay. Were those all items that you
6 purchased?

7 A. Yes.

8 Q. Okay. How would you decide what you would
9 wear?

10 A. Um, well, that's kind of a trick question.
11 You want to rephrase that a little bit?

12 Q. Okay. When you came on for a shift, how --
13 at Crazy Horse, how would you decide what you were
14 going to wear?

15 A. Still, that's the same question. I don't
16 know how to answer that question.

17 Q. Which part is confusing?

18 A. Um, okay, so I'll answer it in a different
19 way. Is that okay? They told you you have to wear a
20 specific kind of outfit.

21 Um, they gave you guidelines, and you had to
22 stay within that guidelines.

23 Q. What -- do you recall any of those
24 guidelines?

25 A. Oh, you have to have your butt covered. You

1 have to have two G-strings. Did everybody do it, no,
2 but I wore a dress, so --

3 Q. Okay. Were any of those guidelines legal
4 requirements, for instance, from Las Vegas Metro
5 Police Department?

6 A. No, just --

7 MS. CALVERT: Objection.

8 THE WITNESS: No.

9 MS. CALVERT: Calls for a legal conclusion,
10 legal opinion.

11 MS. SMITH: If you know.

12 THE WITNESS: I don't know.

13 Q. (BY MS. SMITH) Do you know if there were
14 any legal requirements on you, as a dancer?

15 A. Um, just what's in the forms that they make
16 you sign.

17 Q. So you weren't independently aware of any
18 laws that you had to abide by, as a dancer?

19 A. I don't know if it's by law through Metro,
20 but I know with what they say on the paperwork and
21 during the meetings what you can and cannot do.

22 Q. What's an example of things you cannot do?

23 A. Um, I'll review the paperwork that says you
24 have to have one leg on the floor. Um, you can't
25 touch the customer. They can't touch you.

1 Q. Did you abide by all these guidelines?

2 A. Well, pretty much, because I have a standard
3 for myself and how I wanted to be treated.

4 So part of the industry is going a little
5 bit above, but I didn't like to be molested.

6 So I didn't have a lot of customers touching
7 on me unless -- you know, that's just my rule for me.

8 Q. Okay. So you're saying you did abide by all
9 the guidelines you were given by Crazy Horse?

10 A. I don't know if I want to answer that. I
11 don't think that's relevant.

12 Q. That's --

13 MS. CALVERT: You have to answer to the best
14 you can.

15 THE WITNESS: Without going on and on, it's
16 hard to answer. Um -- um, okay. I'm just going to
17 say no.

18 Because you can't make money by not having
19 anybody not touch you or you not touching anybody
20 else.

21 MS. SMITH: Okay.

22 THE WITNESS: So -- and nobody else did
23 either, so it's kind of hard -- I mean, there's
24 certain things that I would never do that other people
25 would do.

1 But that's just because I have morals, so --

2 MS. SMITH: Okay.

3 THE WITNESS: That's how I guess I can answer
4 that question. I don't --

5 MS. SMITH: Okay.

6 THE WITNESS: It's hard to answer did I
7 follow the rules, I -- I mean --

8 Q. (BY MS. SMITH) Was there --

9 A. -- no.

10 Q. -- somebody monitoring whether or not --

11 A. Absolutely --

12 Q. -- you followed --

13 A. -- yeah. There's cameras. There's hosts.
14 If you -- if you were -- if you were on your knees,
15 they told you to get up.

16 I mean, that's not just necessarily me, just
17 in general.

18 Q. Okay.

19 A. That's just what they do. If -- especially
20 if -- if there was undercover there, they would tell
21 you.

22 Q. Were you ever fined?

23 A. (No response.)

24 Q. By Crazy Horse?

25 A. No.

1 Q. You don't think you were?

2 A. No. For sure was not from Crazy Horse III,
3 no.

4 Q. Okay. So these questions are important.
5 They're basically going to address your second
6 stretch, because that happened in 2011.

7 A. Correct.

8 Q. There is -- I think your counsel will
9 agree -- an ongoing dispute in terms of the statute of
10 limitations, so --

11 A. Of course.

12 Q. -- I'm trying to, you know, gain your best
13 information more recently.

14 A. Right.

15 Q. Stuff that happened in 2005 would not --

16 A. No --

17 Q. -- be --

18 A. -- I'm talking about this --

19 Q. Okay.

20 A. I'm talking about this, because this is
21 what's relevant --

22 Q. Okay.

23 A. -- right now. Oh, yeah --

24 Q. Okay.

25 A. -- absolutely --

1 Q. Okay.

2 A. Yeah. It's just when I got hired back then,
3 that's when that paperwork was given to me. I didn't
4 get new paperwork when I got -- when I was -- when I
5 came back.

6 Q. I'm sorry, when you --

7 A. Well, they --

8 Q. -- first --

9 A. -- have --

10 Q. -- auditioned --

11 A. -- my --

12 Q. -- in --

13 A. They have --

14 Q. -- 2005 --

15 A. -- my paperwork, so it's -- they still have
16 my information. So it's -- they didn't ask me for
17 more information.

18 Q. Okay. So when you -- for when you went back
19 in for your second stretch, you said they already
20 had --

21 A. Yeah. They --

22 Q. -- information --

23 A. -- already had my information --

24 Q. -- at Crazy --

25 A. -- in the --

1 Q. -- Horse?

2 A. -- in their computer.

3 Q. Okay. Did you have to present a --

4 A. Just --

5 Q. -- an updated sheriff's card?

6 A. Yeah, of course.

7 Q. Okay.

8 A. Sheriff's card and business license, yeah.

9 Q. Okay.

10 A. Make sure it was current.

11 Q. Okay. Did you get to choose your own stage
12 name?

13 A. Uh, yes.

14 Q. Okay.

15 A. As long as it was available.

16 Q. Okay. Did you have to run it by anyone at
17 the club?

18 A. Of course.

19 Q. Who did you have to run it by?

20 A. The person that checks you in and the
21 manager, to make sure that it -- it's not being used.

22 Q. Okay. Aside from the general guidelines
23 that you referred to, how else would you decide what
24 to wear on a shift?

25 A. I personally just wore what I was

1 comfortable with.

2 Q. Okay.

3 A. Um, there were times where I was asked to
4 wear a higher shoes. If I were to continue working
5 there, you have to change what you're wearing, kind of
6 thing.

7 Q. When was that?

8 A. It was during the period of while I was
9 dancing, whether it was in February or March or
10 whatever.

11 They -- you know, if I -- if they didn't
12 like my shoes, they'd say you have to wear higher
13 shoes --

14 Q. Do you think --

15 A. -- because it's --

16 Q. -- that was --

17 A. -- strip club.

18 Q. -- in 2011?

19 A. Yeah.

20 Q. Okay.

21 A. I don't wear high shoes, and I've been told
22 I have to wear high shoes if I wanted to work at that
23 club.

24 Q. Okay. When did you -- do you recall when
25 you first met Keith?

1 A. Um, wow. Well, it probably was at the
2 beginning. I don't know -- I think he was the manager
3 back then.

4 Q. When you say --

5 A. If I --

6 Q. -- beginning, can you --

7 A. When I --

8 Q. -- be a little --

9 A. -- first --

10 Q. -- more specific?

11 A. 2005.

12 Q. So you think you met Keith in 2005?

13 A. I believe so. He worked at other clubs too.
14 So I believe I met him prior, but I don't remember
15 which --

16 Q. So --

17 A. -- place.

18 Q. -- not at Crazy Horse?

19 A. Um, I believe so. I just -- I can't recall
20 exactly, because the managers do move around
21 sometimes, so --

22 Q. Okay.

23 A. I mean -- okay. So I will say that that
24 location was other locations. So that's probably how
25 I met him prior. They were called other things.

1 Q. Okay.

2 A. So that's probably how I met him prior.

3 Q. Okay. So aside from the general guidelines
4 that you referenced earlier, was there someone that
5 you had to check in with to approve your outfit when
6 you started a shift?

7 A. No.

8 Q. Okay.

9 A. (Witness shaking head.)

10 Q. And you said you decided -- you typically
11 wear a dress; is that correct?

12 A. Yes.

13 Q. Okay. Could you have worn other things?

14 MS. CALVERT: Objection.

15 THE WITNESS: Sure.

16 MS. CALVERT: Calls for speculation.

17 THE WITNESS: But yes, I could have, but
18 I --

19 MS. SMITH: Okay.

20 THE WITNESS: -- just -- my personal
21 preference.

22 Q. (BY MS. SMITH) Okay. Did anyone at Crazy
23 Horse tell you anything specific about the way your
24 makeup needed to look?

25 A. Yes.

1 Q. What?

2 A. You had to have makeup on.

3 Q. Okay. Is there someone that you would check
4 in with at the beginning of a shift to assess your
5 makeup?

6 A. House mom. She usually looks at you, make
7 sure you're -- you look like you're kind of supposed
8 to look and not go out there and look like a hobo, you
9 know.

10 Q. Okay. What about -- same question for hair.

11 A. Yeah. It's all -- I guess it would be all
12 the same, hair, makeup, what you're wearing.

13 Pretty much just -- not tell you they can't
14 wear that, just making sure that you're abiding the
15 guidelines.

16 Q. Okay. So as long as you were in the
17 guidelines, you could wear --

18 A. And --

19 Q. -- in a variety of outfits?

20 A. Yes.

21 Q. Okay.

22 A. But -- yes, you can.

23 Q. Okay.

24 A. But if the manager didn't like what you're
25 wearing, he definitely would tell you.

1 Q. Okay. During a shift, could you decide to
2 change your outfit?

3 A. Yes.

4 Q. Okay. Did you use any special
5 accessories --

6 A. No.

7 Q. -- at Crazy Horse?

8 A. No.

9 Q. You know, like a boa or a hat?

10 A. No.

11 Q. Okay. Did you tip the house mom?

12 A. Only if I used her services.

13 Q. Okay. So that wasn't like required of you
14 then?

15 A. It's not required.

16 Q. Okay.

17 A. But it's frowned upon if you don't.

18 Q. Okay. If you're using her --

19 A. Exactly.

20 Q. -- products or --

21 A. Of course.

22 Q. Okay.

23 A. And they'll treat you differently if you
24 don't.

25 If you use the -- if you're -- if you're

1 using their stuff and you're -- and you're not tipping
2 them, they give you a major attitude or they give
3 you -- or they cause problems for you.

4 Q. Did you have to report to the house mom?

5 A. When you check in. Bring your slip to the
6 house mom.

7 Q. When you check in?

8 A. Uh-huh.

9 Q. Okay. When you said bring your slip, can
10 you elaborate on that?

11 A. Um, when you check in at the front and you
12 pay your house fee, they give you a slip, and you give
13 that to the house mom.

14 Q. Okay. And then what -- what does the house
15 mom do with that?

16 A. I don't know.

17 Q. Okay. You don't see that slip again?

18 A. No.

19 Q. Okay. Do you know how -- I have that.
20 Would you request a specific song from a DJ?

21 A. I personally did not dance on stage, so no.

22 Q. You never danced on stage?

23 A. Not during this period of time, no.

24 Q. 2011?

25 A. Yeah.

1 Q. Okay.

2 A. I paid a house -- I paid a fee to dance --
3 to not dance on stage.

4 Q. Okay. And why is that?

5 A. Um, because I don't like it.

6 Q. Okay. Would you ever ask to go on stage?

7 A. Yeah, I have before. If I had some
8 customers that wanted to give me lots of money --

9 Q. Okay.

10 A. -- yeah.

11 Q. What about during the 2011 --

12 A. Sure.

13 Q. -- time period?

14 A. (Witness nodding head.)

15 Q. Okay.

16 A. Probably like once maybe. Not very often.

17 Q. Okay.

18 A. It's -- I wanted to be on the floor making
19 money, not doing that.

20 Q. How would you decide which individuals to
21 approach during a shift?

22 A. Um, I don't know.

23 Q. Just -- okay.

24 A. I --

25 Q. Would you go and talk to every single

1 person --

2 A. Um, no.

3 Q. -- in the club?

4 A. No.

5 Q. Okay.

6 A. I mean, I'd say hi. I mean, I have my own
7 approach that I do. But if I find they're not
8 interested, I move on or sit down for a minute or two.

9 And if they don't seem interested, I go to
10 somebody else.

11 Q. What would -- can you describe what your
12 approach is?

13 A. Um, like what I say to them?

14 Q. Yes. If you were to --

15 A. Oh, I just --

16 Q. -- to work --

17 A. -- I ask them hi and ask their name and
18 where they're from and what they're doing here, you
19 know.

20 Q. Okay.

21 A. And then if they -- if they seem like they
22 want to talk to me, I ask them can I sit down, would
23 you like my company.

24 And they'd say yes. I'd spend less than
25 five minutes to find out if they wanted to go in the

1 VIP room or get dances.

2 Q. Okay.

3 A. And if that wasn't going anywhere, I'd say
4 really nice to meet you, thank you, bye.

5 Q. Okay. So if someone wanted let's say a lap
6 dance --

7 A. Uh-huh.

8 Q. -- okay, how much would you tell them a lap
9 dance costs?

10 A. It's \$20. That's what the club tells you to
11 tell the client.

12 Q. Could you accept more than --

13 A. You --

14 Q. -- \$20?

15 A. You can accept a tip, but you can't tell
16 them it's more money.

17 Because the customer will, you know, argue
18 with you, of course, because they know how much the
19 prices are when they come in.

20 Q. So did you ever negotiate with any persons
21 about the -- how much they paid you for a lap dance?

22 A. Um, no. Usually just ask for a tip or
23 something at the end.

24 Q. Okay. What about VIP areas, would you
25 negotiate with someone about how much they would pay

1 you for the VIP areas?

2 A. Uh, we covered that. The person at the host
3 tells the client how much the VIP room was. If
4 it's -- if the client wants to pay more, that's up to
5 the client.

6 Q. Okay. Before you ever take an individual
7 back to the VIP host area, give me an example of the
8 conversation you would have leading up to that.

9 A. Um, I would say the VIP room's a little bit
10 more intimate, just you and me, not everybody
11 watching.

12 Um, I tell them the three for a hundred, you
13 buy two drinks, you can go a half hour for -- at that
14 club, it's \$300 for a half hour, 500 for an hour to be
15 in a private room with a bottle.

16 I just tell them what the club tells me to
17 tell them.

18 Q. Okay. I mean, any special approach to try
19 and encourage someone to enter the VIP area?

20 A. I have a sparkling personality that usually
21 works wonders.

22 Q. Okay.

23 A. It's all a numbers game really.

24 Q. Okay.

25 A. It's a numbers game.

1 Q. If you had only wanted to dance on stage
2 during a shift, could you have done that?

3 A. Uh, if you didn't want to make any money,
4 yeah.

5 Q. Okay. What about if you only wanted to give
6 dances in the VIP area, could you have done that?

7 A. Sure. Same answer.

8 Q. Was anyone with Crazy Horse requiring you to
9 perform a certain number of lap dances per shift?

10 A. No.

11 Q. Okay. Was there a requirement for how many
12 times you're supposed to go into the VIP area with an
13 individual?

14 A. No.

15 Q. Okay. What if you had gone in for a shift
16 and wanted to hang out in the dressing room, could you
17 have done that?

18 A. Sure, if you don't want to make any money.
19 Same answer.

20 Q. Would someone have come to get you?

21 A. Uh, only if you were a stage dancer, you
22 would be required to go on stage.

23 Q. Okay. But you already said that you paid
24 the --

25 A. Me --

1 Q. -- fee to --

2 A. -- personally --

3 Q. -- stay off.

4 A. -- yeah.

5 Q. Okay.

6 A. Are you asking about me personally; right?

7 Q. Yes.

8 A. Yes.

9 Q. Of course, yeah.

10 A. I mean, I never did any of those other
11 things you said, because I went to work to make money,
12 not to sit around in a dressing room.

13 Q. Okay.

14 A. Yeah.

15 Q. Fair enough.

16 A. Uh-huh.

17 Q. What about where you could sit or stand in
18 the club?

19 A. Um --

20 Q. Did Crazy Horse tell you where to sit or
21 stand?

22 A. Not directly, no. Huh-uh.

23 Q. Okay.

24 A. But it's kind of -- that question's a little
25 bit like the other one about if you can go in the

1 VIP room or not and all that, where you could stand,
2 where you can go.

3 Q. So generally, you'd sort of, what, gravitate
4 to wherever individuals were stationed, maybe around the
5 bar or --

6 A. Yeah. I personally did not go around the
7 bar.

8 Q. Okay.

9 A. Because people got -- people at the bar
10 usually are drinking, and they don't want to -- and I
11 don't drink, so I didn't go to the bar.

12 Q. Okay.

13 A. But I -- you know --

14 Q. Okay.

15 A. -- I would usually go where --

16 Q. So you could --

17 A. -- I --

18 Q. You were free to avoid the --

19 A. Yeah.

20 Q. -- bar area.

21 A. Of course.

22 Q. Okay. All right. What about taking a break
23 during the shift?

24 A. Yeah, that's fine.

25 Q. Okay. Did you have to check in with any

1 managers to take a break?

2 A. No.

3 Q. Was there a certain place you were supposed
4 to take a break at?

5 A. Um, like what kind of break are you talking
6 about, like --

7 Q. Just a --

8 A. -- like --

9 Q. -- rest.

10 A. -- if I need a breather?

11 Q. Yeah. Maybe you gave a lap dance, and you
12 decided you needed a break.

13 A. Oh. Yeah, I would just probably go in the
14 back.

15 Q. Okay.

16 A. Fix my lipstick or go to the bathroom or
17 relax for a minute, whatever.

18 Q. Okay.

19 A. Text somebody. I don't know. Yeah.

20 Q. All right. What about your cell phone,
21 could you have that with you when you were performing
22 during a shift?

23 A. I want to say I -- I don't know. I don't
24 remember at this club.

25 Q. Okay.

1 A. It was too long ago. I can't remember.

2 Q. Okay.

3 A. Sorry.

4 Q. It's fine. Did you have access to it on
5 your breaks?

6 A. Sure.

7 Q. Okay.

8 A. Yeah. Actually, I'm going to -- yes, I do
9 remember. No, you couldn't. It was in my locker.

10 Q. Okay.

11 A. I just remembered, because I just -- I
12 remember something very specific. And yeah, it was
13 always in my locker.

14 Q. Okay.

15 A. Yeah.

16 Q. But you could visit your locker as many times
17 as you --

18 A. Oh --

19 Q. -- needed to --

20 A. Uh-huh.

21 Q. -- throughout the evening?

22 A. Yes.

23 Q. Okay. Was that a locker assigned just to
24 you?

25 A. No.

1 Q. Okay. Would you bring a lock to keep on it?

2 A. Yes. And you'd pick one that was available
3 to you. In this room, yes, I did --

4 Q. Okay.

5 A. -- have a locker.

6 Q. In 2011 --

7 A. Yes.

8 Q. -- right. Okay. So were you -- could you
9 go and get food or something to drink whenever you
10 wanted to on a shift?

11 A. On this one, no food. Um, they had snacks
12 in the snack machine. I guess I could have done that
13 or ordered food in.

14 Q. Okay.

15 A. But me personally, I did not.

16 Q. Okay.

17 A. But I could get my -- I can go into the
18 locker and drink my water. Or usually a client would
19 buy me a water, so I would always have water with me.

20 Q. Okay. So when you decided you were done
21 taking a break, would you have to check in with
22 anyone, any host or --

23 A. No.

24 Q. -- manager?

25 A. No.

1 Q. Okay. On average, how much do you think you
2 would make on a shift in that 2011 time period?

3 A. Um, it varied from shift to shift.

4 Q. What would a range be for a weekend night?

5 A. Um, it could be from being negative or a
6 thousand bucks.

7 Who knows. Matters on if I was in the VIP
8 room or not or if there was anybody to make money off
9 of.

10 Q. What about a weekday?

11 A. Same -- same answer.

12 Q. Same?

13 A. Uh-huh.

14 Q. Okay.

15 A. Remember, I said it's a numbers game.

16 That's the answer that -- that best describes --

17 Q. Okay.

18 A. -- that question.

19 Q. So when you say numbers game, what all do
20 you intend that to mean --

21 A. Well, I could --

22 Q. -- aside from --

23 A. -- go --

24 Q. -- just wanting to make --

25 A. Well --

1 Q. -- the most amount of money?

2 A. Meaning -- numbers game meaning clients. So
3 if I go up to five clients and one does something
4 great or I go up to ten clients and nobody does
5 anything. You never know.

6 Q. Okay.

7 A. I could work all night and talk to 20
8 people, and nobody does anything.

9 Or I'll go and work the same -- a different
10 night and talk to one and make all my money off that
11 one person.

12 Q. Okay.

13 A. Whatever that number is.

14 Q. And no one was monitoring how many
15 individuals in the club that you approached?

16 A. No.

17 Q. Okay. So could you spend all of your time
18 with one individual if you wanted to?

19 A. Sure.

20 Q. Okay. What was the reason that you --
21 sorry.

22 You said you went -- you tried to go back to
23 Crazy Horse for a third stretch?

24 A. Yeah. Yes.

25 Q. And why was that?

1 A. Um, because I was let go at Olympic Gardens
2 for the hundredth time -- no, I'm kidding -- for I
3 don't even know.

4 But because I -- yeah. That's a whole
5 'nother thing. So -- so I went over here and to see
6 if I can get rehired.

7 And I think they saw my age, and they said
8 no --

9 Q. Okay.

10 A. -- at the front -- at the back door.

11 Q. Did someone tell you that?

12 A. In a roundabout way.

13 Q. Okay.

14 A. It was -- it was hinted that my -- my age
15 was an issue by the person at the back door. And I
16 don't know who that was.

17 Q. Okay.

18 A. Because the first thing he asked was can I
19 see your ID and your sheriff's card.

20 Q. Okay. When you say the person at the back
21 door, was that --

22 A. The person who checks you in.

23 Q. Okay.

24 A. I don't know who that is.

25 Q. Okay.

1 A. It's brand new people.

2 Q. Did you ever speak to a manager when you had
3 tried to go back in --

4 A. That --

5 Q. -- for that --

6 A. -- specific --

7 Q. -- third --

8 A. -- person --

9 Q. -- stretch?

10 A. -- said no.

11 Q. The check-in person --

12 A. Yes.

13 Q. -- told you no?

14 A. Yes.

15 Q. Did you request to speak to a manager?

16 A. Yes.

17 Q. Okay. Okay. So you had mentioned
18 previously that there were some required tips; is that
19 right?

20 A. Of course, uh-huh.

21 Q. Okay. Can you just list those again?

22 A. Um, house mom does -- it's not required, but
23 it's -- it's frowned upon if you don't. And the --
24 the DJ.

25 Q. Okay. And how much to the DJ?

1 A. Um, I would say at least \$20 so that he
2 doesn't get mad at you, doesn't cause problems for you
3 later.

4 Q. Okay. So I'm going to make the
5 differentiation between required and expected, using the
6 example --

7 A. It's --

8 Q. -- of a house --

9 A. Those --

10 Q. -- mom --

11 A. -- are expected.

12 Q. -- as expected.

13 A. Those are expected.

14 Q. Okay. So technically not a rule, saying you
15 have to give the DJ \$20, but everyone sort of did it?
16 Is that what you're saying?

17 A. Yeah. And if you were not on stage, then
18 you are required to tip, if you danced on stage and
19 made money.

20 But as -- I'm talking in general now,
21 because I never danced on stage. But that is the
22 rule.

23 Q. Okay. So -- okay. Did you still tip the
24 DJ, even though you were not dancing on stage?

25 A. Um, I did sometimes, yeah.

1 Q. Okay. Anybody else that was required?

2 A. No.

3 Q. Anybody else that was expected?

4 A. Front door. Like, um, when you check in and
5 check out.

6 Q. Okay. That's it?

7 A. Yeah. Oh, sorry. The host in the VIP room,
8 when you leave the VIP room.

9 Q. Now, would you say that was required or
10 expected?

11 A. Expected.

12 Q. Okay. And once again, I'm using the
13 definition of expected as not a rule --

14 A. Right.

15 Q. -- by the club but --

16 A. But it all falls on the -- the thing of
17 feeling like if you don't do something, you'll be
18 fired.

19 I always felt that way.

20 Q. Okay.

21 A. To me, I call that bullied, because I felt
22 like that all the time. I was always afraid to do the
23 wrong thing because I might be let go.

24 Or would I be able to go into my next shift,
25 because did I do anything wrong, I don't know, kind of

1 thing.

2 Q. Were you ever disciplined while working at
3 Crazy Horse?

4 A. Yes.

5 Q. Can you describe any of those incidents?

6 A. Um, about asking for tips or how I'm dancing
7 or not going into the VIP room unless I'm escorted in
8 with somebody else.

9 Q. Okay. So --

10 A. Don't sit in the VIP bar and wait for
11 customers, but they'll let other people do that. But
12 they wouldn't let me do that.

13 We're talking personal level here --

14 Q. Uh-huh.

15 A. -- because that's what I'm doing personally,
16 going after.

17 Q. Okay.

18 A. Because I felt that way all the time.

19 Q. Okay. All right.

20 A. Especially coming back again.

21 Q. In 2011?

22 A. Yes.

23 Q. Okay. So then why would you come back in
24 2011, if you felt --

25 A. Well --

1 Q. -- kind of bullied previously?

2 A. It's all about the money. If they let me
3 work there again, I'm going to work there again.
4 Because there's men that go into that club.

5 So I'm going to go try to work in a club.

6 Q. Okay. Why Crazy Horse as opposed to any of
7 the --

8 A. Because --

9 Q. -- other --

10 A. -- there's --

11 Q. -- clubs?

12 A. -- there's customers there. Because I've
13 worked at other clubs already. Because I have my own
14 personal reasons for that scenario.

15 So I would try again over the years.

16 Q. Okay. What would be those reasons for
17 selecting Crazy Horse over other clubs?

18 A. Um, customers. There's customers there.
19 The limos are bringing customers there.

20 Q. Okay. Was it -- can you elaborate -- just
21 the fact that customers were present?

22 A. There's -- yeah. Wherever there's money,
23 I'm going to go try to work.

24 Q. Okay. Did you not think there was money at
25 other clubs?

1 A. Okay. So I have worked at other clubs. And
2 the same thing I'm doing right now is with other clubs
3 as well.

4 So if I've let -- been let go there for
5 reasons that I don't know about, same scenario. Would
6 I go back to those clubs again, yes.

7 Would I try to get rehired, same thing with
8 Crazy Horse III, try to get rehired again so I can
9 have a job.

10 Q. Okay. And then did you say that you retired
11 from dancing in 2015?

12 A. Yes.

13 Q. Why is that?

14 A. At the end of --

15 THE WITNESS: Um, can I answer that?

16 MS. CALVERT: Oh, yeah.

17 THE WITNESS: Oh. Um, because another club
18 did the same thing that Crazy Horse did to me.

19 Q. (BY MS. SMITH) Which was -- can you be
20 more --

21 A. Put me --

22 Q. -- specific?

23 A. -- on a shift or let me go or I check in and
24 it's -- I can't check in.

25 Why can't I check in, oh, because we did

1 this. You can work this specific time or you don't
2 work here.

3 Q. So you said another -- another club
4 previously did that?

5 A. Yeah, in the last club I worked at.

6 Q. Was that Olympic Gardens?

7 A. No, that was Treasures.

8 Q. Okay.

9 A. And they put me on a day shift, and they
10 said I could work between the hours of 4:00 and 11:00.

11 And I couldn't go in at 4:00, because, as
12 you know, I have a daughter, and she's in dance, and I
13 teach dance.

14 And so I couldn't go in until she was home
15 and going to bed for school the next day. Then I can
16 go to work.

17 So they all knew that. So did Crazy Horse
18 III. So did Treasures.

19 So putting me on the day shift is the same
20 as firing me, pretty much. But they tried to save
21 themselves by not getting rid of you for this purpose.

22 So they say something different so that
23 they -- they can't be liable for actually firing you
24 or letting you go, because you're an independent
25 contractor.

1 So they have to do other things to make
2 themselves be safe in their actions.

3 Q. Okay. So I'm just trying to be clear here,
4 so --

5 A. Because you just asked me about other
6 places. That's why --

7 Q. Right.

8 A. -- I'm trying to --

9 Q. But when --

10 A. -- say it --

11 Q. -- you -- but when --

12 A. -- to just --

13 Q. -- but when you --

14 A. -- this --

15 Q. -- said -- right.

16 A. -- but you're --

17 Q. Okay. So when --

18 A. -- not saying --

19 Q. -- you said Crazy Horse did the same thing
20 to you as another club did. So you mean they --
21 during that second stretch in 2011 --

22 A. No. This one was where I went -- yeah, I
23 went to the shift, and they said you have to talk to a
24 manager --

25 Q. Okay.

1 A. -- and -- and then the same scenario.
2 Except the other place was you can work a day shift.
3 But this one was you can't work at all. But
4 they wouldn't tell me why.
5 Q. Okay. Crazy Horse just said you can't work.
6 A. Right.
7 Q. Okay. During that time, when they said you
8 can't work at all, were you going in as an independent
9 contractor?
10 A. I'm sorry?
11 Q. Or were you trying -- were you trying to be
12 hired as an employee of the club?
13 A. No, just -- you mean when I went the third
14 time or this time?
15 Q. The second time.
16 A. No. It's the same. It's --
17 Q. What about the third time?
18 A. It's the same. It's -- there's only one way
19 you can work as a dancer in this town.
20 Q. Okay.
21 A. Which is the problem.
22 Q. Why do you think that's a problem?
23 A. Well, it's -- that's why we're here.
24 Because it's an unfair thing.
25 Because we should -- if we're going to be

1 told what to do and what to wear and when to be there,
2 then we should be getting paid a minimum wage, just
3 like the waitresses, and not having to pay a house
4 fee.

5 Q. Okay. Did you have any specialty moves that
6 you used during your shift?

7 A. No. Sorry. I don't mean to laugh at that
8 one.

9 Q. No, it's fine. I do not know everything a
10 lap dance might entail. So I don't know if there
11 would be special moves that you would use or that you
12 were good at.

13 Would you practice your dancing outside of a
14 shift?

15 A. No.

16 Q. Do you think that you are a good dancer?

17 A. Sure.

18 Q. Okay. What do you base that on?

19 A. Well, I'm going to answer this: Being an
20 entertainer when you don't dance on stage is not about
21 dancing.

22 Q. Okay. So then do you think you were a good
23 non-dancing entertainer?

24 A. I made money, so I was good at what I do.
25 Most of the time, it's because of my personality, and

1 I talk a lot. That's usually how I made most of my
2 money.

3 Q. Okay. Do you think that makes you better
4 than other girls that come on for a shift?

5 A. No.

6 Q. Nothing that makes you stand out?

7 A. No.

8 Q. Do you think anyone can be an entertainer
9 and make money?

10 A. No.

11 Q. How come?

12 A. It takes a certain kind of personality.
13 And, um, you have to kind of be good at sales, and
14 I --

15 Q. Okay.

16 A. -- am good at that.

17 Q. And we've been using entertainer and
18 dancer --

19 A. You can use --

20 Q. -- and --

21 A. -- any --

22 Q. -- performer kind of interchangeably. But
23 just so we're all on the same page, it meant, you
24 know, performing at Crazy Horse, doing dances, talking
25 to people that were in there in that scenario.

1 A. Yes.

2 Q. Okay.

3 A. You can call it whatever you'd like to call
4 it.

5 Q. Just making sure. Okay. So in 2011, did
6 you ask for any wages from Crazy Horse?

7 A. It wasn't an option to ask or was not
8 knowledgeable that we could ask.

9 Q. Okay. So you didn't?

10 A. No.

11 Q. Okay. Did you ever go on promotions --

12 A. No.

13 Q. -- for the club?

14 A. No.

15 Q. Okay. Were you required to do that?

16 A. No.

17 Q. Okay. Were you ever asked to do that?

18 A. Once.

19 Q. And did you turn that down?

20 A. Yes.

21 Q. How come?

22 A. Because I don't want to promote myself like
23 that.

24 Q. Okay. So did the club require you to do any
25 promotion of Crazy Horse specifically?

1 A. No.

2 Q. So did you receive any citations from Las
3 Vegas Metro Police when you were at Crazy Horse?

4 A. No.

5 Q. How about any time in the last -- since
6 2012?

7 A. No.

8 Q. Prior to that?

9 A. What years are we talking? Ever?

10 Q. Yeah. Have you ever received a citation for
11 solicitation?

12 A. Yes.

13 Q. When did you receive that?

14 A. When Crazy Horse II was open, which I don't
15 know when that closed. And I will say that that was,
16 um, unlawful dancing, they called it.

17 But I actually wasn't dancing. I was --
18 they told me that I was obstructing justice at the
19 club, but -- because I knew that there was undercover
20 there.

21 And it was early on, like 7:00 o'clock. I
22 received a citation for unlawful dancing. But went
23 into a group of girls that were -- I'm sorry.

24 For obstructing justice, but went into a
25 group of girls that were doing unlawful dancing.

1 And I fought that for years and got -- and
2 it was moved -- I was in some group that didn't go to
3 the Supreme Court, and it never went.

4 So I tried to expunge it, so --

5 Q. Okay. So when you say Crazy Horse II, you
6 do not mean this Crazy Horse --

7 A. Crazy --

8 Q. -- correct?

9 A. -- Horse II.

10 Q. Okay.

11 A. It's a different club.

12 Q. Was that a different -- that was a different
13 location --

14 A. Totally.

15 Q. -- right?

16 A. That --

17 Q. Okay.

18 A. -- was --

19 Q. I just want to make things clear.

20 A. Yeah.

21 Q. So you understand them to be different
22 entities.

23 A. Of course.

24 Q. Okay.

25 A. Yes.

1 Q. And --

2 A. It's --

3 Q. -- that --

4 A. -- absolutely --

5 Q. -- that wasn't --

6 A. -- two different --

7 Q. -- Russell Road --

8 A. No, no.

9 Q. -- when --

10 A. But you asked me when I received a ticket,
11 so --

12 Q. Of course --

13 A. -- I was giving --

14 Q. -- yeah.

15 A. -- answer --

16 Q. No.

17 A. -- for --

18 Q. The right answer, just trying to clarify
19 things?

20 A. I -- yes. By law, I have to answer that
21 question, so yes.

22 Q. Okay. And you -- I'm sorry. You already
23 testified that you were not subjected to any fines
24 while you were --

25 A. No.

1 Q. -- dancing at Crazy Horse?

2 A. No.

3 Q. Okay. Move back to Crazy Horse III.

4 A. Crazy Horse III.

5 Q. Okay. Who would you -- did you report to
6 anyone while you were on a shift?

7 A. You asked me that already. What -- be more
8 specific, please.

9 Q. Would you have to report to any specific
10 manager or a certain number of managers?

11 A. No.

12 Q. Okay. So you would check in; is that
13 correct?

14 A. Yes.

15 Q. Work your shift for however long?

16 A. Yes.

17 Q. Okay. And then what was your procedure to
18 leave the premises?

19 A. Um --

20 Q. Can you walk me through that?

21 A. Well, if it was my -- it was my six hours, I
22 would ask the DJ if I can leave. And he would look at
23 the timeframe on the computer and say yes, you can,
24 give me a slip.

25 I go to the house mom, give it to her to

1 look and sign. And then when you leave, you give it
2 to the people at the -- the back door, where you
3 checked in.

4 And that's it -- and then they give you a
5 slip when you check out.

6 Q. Okay. Did you retain any of those slips?

7 A. At the time. I don't have any now.

8 Q. That's fine. Okay. So if -- it was
9 after --

10 A. That's what this is all about.

11 Q. Okay.

12 A. That's why I didn't retain anything.

13 Q. Okay. So when you say that's what this is all
14 about, do you --

15 A. They --

16 Q. -- know what --

17 A. They have --

18 Q. -- Club Tracks is?

19 A. They have -- they have records when I've
20 checked in and checked out.

21 Q. Okay. Are you -- when you say they have
22 records, can --

23 A. The club --

24 Q. -- you be --

25 A. -- does.

1 Q. -- more specific? Okay.

2 A. Crazy Horse III.

3 Q. Okay.

4 A. In their computer system.

5 Q. Okay. So do you know what Club Tracks is?

6 A. I'm sorry?

7 Q. Do you know what Club Tracks is?

8 A. No.

9 (The court reporter asked for one
10 person to speak at a time.)

11 Q. (BY MS. SMITH) What do you expect to get
12 out of this lawsuit?

13 MS. CALVERT: Object. Calls for a legal
14 conclusion or legal opinion. But answer to the extent
15 if you know.

16 THE WITNESS: What do I expect to get
17 personally?

18 MS. SMITH: Yes.

19 THE WITNESS: I guess justice for all the
20 wrong that I had to pay out and be told what to do and
21 fired and hired and fired and let go and -- just the
22 bullying and the attitudes and the -- everything that
23 went along with while I was working there.

24 Q. (BY MS. SMITH) And when you say there, you
25 mean Crazy Horse?

1 A. Crazy Horse III, yeah.

2 Q. Okay. You said justice?

3 A. Well, I think that as a entertainer, having
4 to pay out to work at an establishment is -- is tough
5 when you're told how to do things.

6 If I'm an independent contractor, then an
7 independent contractor, I'm -- should be able to work
8 anywhere I want and not be fired or not be let go.

9 If they let me work there in the first
10 place, as long as I'm not drinking, doing drugs,
11 soliciting myself, doing anything wrong lawfully,
12 there's no reason for them to let me go.

13 Unless I was an employee and they had to
14 fire me for something that I did wrong.

15 Q. Okay. Okay. Are you hoping to recover
16 money?

17 A. Yeah. My lost wages here, that I had to
18 give out for all the shifts. I think that it's unfair
19 to have to pay to work at a place.

20 Q. What do you mean, your lost wages that you
21 had to --

22 A. Well --

23 Q. -- pay out?

24 A. -- just the money that I put out. All the
25 money that I put out and the tips that I had to give.

1 You don't have to do that at a regular job
2 unless you're an employee, like a food server, where
3 you're required to tip out the bartender.

4 We shouldn't had to been required to do or
5 expected to do anything.

6 Q. Who told you about this lawsuit?

7 A. Um, I overheard it at -- at a club I was
8 working at. And then asked the person -- I don't know
9 who the person -- I don't know the name of the person.

10 I just asked her about it, and she gave me
11 the number of the person she was dealing with.

12 Q. And --

13 A. And I don't -- I don't remember who it was
14 at the time.

15 Q. Okay. You don't remember who you first
16 contacted?

17 A. You -- you mean the lawyer?

18 Q. Yes.

19 A. I mean, it's the same law firm, just another
20 person that was working there. I don't think they work
21 there now.

22 Q. When you say same law firm, are you referring
23 to Morris Anderson?

24 A. Yes, yes.

25 Q. Okay.

1 A. Yeah.

2 Q. Okay.

3 A. I'm sorry. I didn't make that clear. Yes,
4 Morris Anderson.

5 Q. There are a few law firms working in
6 conjunction --

7 A. Oh.

8 Q. -- it's fair to --

9 A. This is --

10 Q. -- say, so --

11 A. This is -- yeah. This is -- this is, yeah.

12 Q. Okay.

13 A. This is the law -- this is the law firm that
14 I contacted right away.

15 Q. Okay.

16 A. It was a per -- it was a specific person's
17 number that this person had.

18 Then I called, and then they said okay,
19 well -- and then I was talking to so many different
20 people in the law.

21 Finally, I have just her.

22 Q. Okay.

23 A. So --

24 Q. Is there a reason that you agreed to be a
25 named plaintiff?

1 A. Yeah. Because I feel all the -- as I
2 said -- I'm going to repeat myself.

3 The -- everything that I felt like that
4 happened during my time as a dancer, I feel is unfair.

5 And although yeah, great money here and
6 there, I just think that we could have -- when I found
7 out more facts about all of this, I -- it just made
8 sense to me. So --

9 Q. Have you received any other settlements or
10 pay-outs from other lawsuits against gentleman's
11 clubs?

12 A. Um, I received \$18 from a Sapphire one that
13 was like from 12 years -- or whatever it was. I have
14 no idea.

15 All of a sudden, I just got a check for \$18,
16 so that was it.

17 Q. Okay.

18 A. I think I was put in there at some point --

19 Q. Okay.

20 A. -- because of the -- I guess their computer
21 system and whoever was in that group of time frame.

22 I'm not sure, because I had no idea what it
23 was --

24 Q. Okay.

25 A. -- what it was until I was told hey, you

1 have -- you're on the Sapphires list. You should call
2 them and find out.

3 Q. Okay.

4 A. And I got an 18 dollar check. I'm like what
5 is this.

6 Q. So you weren't deposed in that one.

7 A. No.

8 Q. And you haven't been deposed in the other --

9 A. No.

10 Q. -- lawsuits you have ongoing.

11 A. No. That was a different lawyer also.

12 Q. Okay.

13 A. I never talked to anybody there. Just some
14 business office.

15 Q. Okay. Are you aware of recent law that the
16 Nevada legislature has passed regarding classification
17 of independent contractors?

18 A. No.

19 Q. Okay. Did you know that the Nevada
20 legislature passed a statute that sets forth criteria
21 to define independent contractor?

22 MS. CALVERT: Objection. Misstates.

23 THE WITNESS: No, never.

24 MS. SMITH: Okay. I'm going to mark this as
25 Exhibit B. It's Bates stamped RR0085 through RR0087.

1 It's entertainer charge summary.

2 (Defendant's Exhibit B was marked for
3 identification.)

4 MS. SMITH: Did you need this one?

5 MS. CALVERT: Which -- what's the Bates
6 number?

7 MS. SMITH: What does this say.

8 MS. CALVERT: Did you say the 88 --

9 MS. SMITH: 85 through 87.

10 MS. CALVERT: Okay.

11 Q. (BY MS. SMITH) I'll just give you a minute
12 to review that.

13 A. Yeah. This is the '07 thing that I kept
14 stuck in my head.

15 Q. Okay.

16 A. Yes, yeah. And there's '09 too. There's --
17 there's '07, there's '08, '09. No 2010. I must have
18 not worked there during that time.

19 Q. So do you think that this document better
20 reflects maybe your second stretch, and 2011 would
21 have been in fact your third stretch?

22 A. No. No, because, um -- well, no. Because
23 2007 went into 2008 right away.

24 Q. Uh-huh.

25 A. And then 2008, and that -- then -- oh, let's

1 see. 2008, then 2009, there was a lot of months in
2 between.

3 2008, 2009. I could have just stopped
4 dancing for a while maybe, went somewhere. I don't
5 think I was let go though.

6 Came back in 2009 for a short time.
7 (Witness reading.) I don't know if I was let go in
8 between '8 and '9. I think I just stopped working for
9 a while.

10 Q. Okay.

11 A. Um, could have been. I could have been. I
12 don't know. As I said before, I've been --

13 Q. What about between 2009 and 2011?

14 A. That was -- um, that was one of those put on
15 the day shift thing.

16 Q. Okay. And did you ask not to be put on the
17 day shift?

18 A. Yeah. Well, I -- well, yeah. As I said,
19 the day shift is -- is like firing me. And I told
20 them that.

21 Putting me on day shift is -- I can't even
22 work the day shift. He says then I guess you can't
23 work here. So I left.

24 Q. Okay. But then you chose to come back to
25 Crazy Horse in --

1 A. Well --

2 Q. -- 2011?

3 A. Yeah. I came back to see if they'd rehire
4 me. And they did. A different manager hired me. I
5 don't know who it was at the time.

6 Q. And you don't know the reason for that 2010
7 to 2011 gap?

8 A. 2009, 2011, I was probably at a different
9 club. Because they put me on a shift that I couldn't
10 work.

11 So I probably went to -- I went to Olympic
12 Gardens again.

13 Q. Okay. Does this seem to be an accurate
14 assessment --

15 A. Yes.

16 Q. -- of your --

17 A. Uh-huh.

18 Q. Okay. What would be on the page marked
19 RR0085, a locals party?

20 A. A what?

21 Q. A locals party?

22 A. What --

23 Q. You see it on the first page, 0085.

24 A. 0085.

25 Q. Part of the way down.

1 A. A locals party -- oh, that's one of those
2 parties that you were asking me about earlier, the --
3 or mingle.

4 It's the same thing. They'll have a -- a
5 party where they'll bring the limo and the taxi
6 drivers in and some of the locals that have money and
7 have a party with drinks and food for them.

8 And us to come in and work and -- and
9 usually, we didn't really make money during that time,
10 because they're so busy, but -- you know, mingling.

11 But that's what that is.

12 Q. Okay. And it looks like you might have
13 gotten a credit?

14 A. No. Those are credits.

15 Q. It --

16 A. The way --

17 Q. -- says --

18 A. -- they --

19 Q. -- adjustment. What does that mean to you?

20 A. Okay. When they do that, it just means that
21 they -- the adjustments are that -- that -- all the
22 minuses are just saying that your house fee was done
23 and there was a payment.

24 And the adjustment of price change would be
25 it was \$50 instead of whatever the price was at that

1 shift.

2 So if it was more or less. There was no
3 ever money given back or anything like that. There
4 was no, um -- um, if you left early, you can have
5 your money back. It was nothing -- nothing like
6 that.

7 Q. So if you participated in this locals party,
8 you didn't receive any --

9 A. No.

10 Q. -- credits or anything --

11 A. No.

12 Q. -- of that effect?

13 A. Huh-uh. I don't know what that means
14 when -- and -- when it's an adjustment. Because I
15 paid fees every time I went there.

16 MS. SMITH: Okay. Let's take a quick
17 five-minute break.

18 THE WITNESS: Okay.

19 MS. SMITH: Give the court reporter a
20 minute.

21 (Short recess taken.)

22 MS. SMITH: Okay. Again, just as a
23 reminder, Ms. Allen, we're back on the record, and
24 your oath is still in effect.

25 Q. (BY MS. SMITH) So let me try and just

1 clarify a little bit. In 2011 --

2 A. Uh-huh.

3 Q. -- what shift were you given by Crazy Horse?

4 A. Um, any time.

5 Q. Okay.

6 A. Or night shift. I -- just say night shift.

7 Night shift. I think that's what they called it.

8 Q. What did you understand those hours that you
9 could be in the club to be?

10 A. It was just at night.

11 Q. Okay.

12 A. Like nighttime.

13 Q. Okay.

14 A. When it got dark, I guess.

15 Q. Okay. So in 2011, would anyone at Crazy
16 Horse ask you to leave at a certain time?

17 A. No. Huh-uh.

18 Q. Okay. And I'm just going to refer to
19 Exhibit B -- I'm sorry.

20 A. Okay.

21 Q. Exhibit A one more time.

22 A. Okay.

23 (Cellular phone interruption.)

24 THE WITNESS: It's just my daughter. Sorry.

25 She's just telling me she's going to get --

1 MS. SMITH: If you need a minute, we can --

2 THE WITNESS: It's okay.

3 MS. SMITH: -- take a break.

4 Q. (BY MS. SMITH) Okay. So Exhibit A, it
5 looks like the majority of the time, you would work --
6 or you would perform for less than six hours.

7 Does that look accurate to you?

8 A. Yeah. Uh-huh.

9 Q. Okay. So do you think this is an accurate
10 reflection then of --

11 A. Yeah.

12 Q. -- 2011?

13 A. Yeah. I mean, I asked -- I asked to leave
14 early a lot because of my daughter.

15 Q. Okay. And you were free to do that?

16 A. Yeah. As long as I asked, yeah.

17 Q. Okay. All right. Did you have to pay any
18 extra fee to leave prior to six hours?

19 A. No.

20 Q. Okay. All right. I'm going to hand you a
21 document that was served, called Plaintiff Stacie
22 Allen's Answers to Defendant's Interrogatories.

23 I'm going to hand that to you to look over.
24 If you get a copy that's got my handwriting on it, let
25 me know. I think that is a clean version.

1 THE WITNESS: Did I see this already?

2 MS. CALVERT: Just take a look through and
3 see. I can't -- I can't tell you anything.

4 THE WITNESS: Oh, yeah, I've seen this.

5 Q. (BY MS. SMITH) Okay. So have you reviewed
6 that before, that document before?

7 A. Yeah, I believe so, online.

8 Q. When you say online, you mean like an email?

9 A. Yeah --

10 Q. Okay.

11 A. -- email.

12 Q. Okay.

13 A. Sorry.

14 Q. No, just trying to understand.

15 A. Online. No, email. Email.

16 MS. SMITH: Okay. I'm going to have the
17 court reporter just make that as the next --

18 THE WITNESS: Okay.

19 MS. SMITH: -- exhibit.

20 THE WITNESS: Oh. (Witness reading.)
21 Plaintiff is not me; right? Is that me? I'm the
22 plaintiff; right?

23 MS. CALVERT: You're the plaintiff.

24 THE WITNESS: Okay. Wait. Okay. They --

25 MS. CALVERT: There's no question pending

1 right now, so --

2 THE WITNESS: Okay.

3 MS. CALVERT: Sorry. It's okay. But she's
4 going to want to let -- yeah.

5 THE WITNESS: Yeah. Okay.

6 (Defendant's Exhibit C was marked for
7 identification.)

8 Q. (BY MS. SMITH) Okay. Ms. Allen, have you
9 had a chance to look through that document titled your
10 answers to defendant's interrogatories?

11 A. Uh-huh.

12 Q. And you understand Defendant to be Russell
13 Road --

14 A. Yes.

15 Q. -- Food and Beverage?

16 A. Uh-huh.

17 Q. Okay. And you may have said, but have you
18 seen these questions and responses previously?

19 A. Yes.

20 Q. Okay. Are all these answers accurate, to
21 the best of your knowledge?

22 A. Best of my knowledge, yeah.

23 Q. Okay. So on the -- on page 14 of 15 --

24 A. Uh-huh.

25 Q. -- have you seen that document, titled

1 verification?

2 A. Yes.

3 Q. And is that your signature?

4 A. It doesn't look like it, actually.

5 Q. Okay. Are you disputing that that's your
6 signature?

7 A. I'm just wondering if it was done online or
8 not. Because it's harder to do, but all these little
9 scribble things, I don't do that.

10 Yeah, that's not my signature.

11 MS. CALVERT: Did you do -- is that how --

12 THE WITNESS: Yeah, that maybe, but that
13 doesn't look like that.

14 MS. CALVERT: She used a vine sign, which is
15 online. So I think when they put it in, it probably
16 scrunches it down.

17 THE WITNESS: Maybe. Yeah.

18 MS. CALVERT: That's all I'm --

19 THE WITNESS: It could be. And I'm using my
20 finger, so sometimes it's harder to sign --

21 MS. SMITH: Okay.

22 THE WITNESS: -- a -- it looks a little
23 different. It looks more like scribble here. It
24 doesn't look like --

25 MS. SMITH: Okay.

1 THE WITNESS: -- the S's -- I don't know.

2 MS. SMITH: So let's let the record reflect
3 that --

4 THE WITNESS: That --

5 MS. SMITH: -- counsel --

6 THE WITNESS: See -- see that does not look
7 like that right --

8 MS. SMITH: Hang on a second. I want the
9 record to show that Counsel Laurent Calvert showed a
10 screen on her laptop reflecting --

11 MS. CALVERT: It's vine. Vine sign is
12 the --

13 MS. SMITH: Okay. A document that says vine
14 sign on the left-hand side. It says this document was
15 signed by Stacey Allen.

16 THE WITNESS: Uh-huh.

17 MS. CALVERT: And then --

18 MS. SMITH: And it does not directly
19 reference the document.

20 MS. CALVERT: Oh, hang on.

21 THE WITNESS: It -- it looks very similar,
22 if it was scrunched maybe, but it looks like it's
23 more -- I don't know.

24 MS. SMITH: Can we go off the record for a
25 minute?

1 MS. CALVERT: Yeah.

2 (Discussion off the record.)

3 MS. SMITH: Well, hang on. Let's go --
4 wait. Let's go back on the record for this then.

5 MS. CALVERT: Oh, yeah. Sorry.

6 MS. SMITH: I was just giving you a minute
7 to scroll through, so. Okay. Now we're back. So --

8 MS. CALVERT: We can send you the documents
9 to go with this. It --

10 MS. SMITH: Okay. I would appreciate that.
11 Just because it's a verification of your --

12 MS. CALVERT: Or we can --

13 MS. SMITH: -- responses.

14 MS. CALVERT: -- have her re-verify or
15 whatever. But I can send you the confirmation or
16 whatever.

17 I have a feeling it's -- the text box is
18 probably not shaped --

19 THE WITNESS: Probably. Uh-huh.

20 MS. CALVERT: -- the same way, but --

21 THE WITNESS: It's -- it's just looking a
22 little different, not saying that it's not me. But
23 it -- as -- as she's saying, it's -- looks like it's
24 scrunched.

25 So it's probably the same signature. But

1 just looking at it like here, it doesn't look --

2 MS. CALVERT: I'll --

3 THE WITNESS: But looking there, it does --

4 MS. SMITH: Okay.

5 THE WITNESS: -- on the computer.

6 MS. CALVERT: I'll send you the

7 confirmation --

8 MS. SMITH: Okay.

9 MS. CALVERT: -- paperwork.

10 MS. SMITH: But currently, I'm just going to
11 put an objection on the record --

12 MS. CALVERT: Yeah.

13 MS. SMITH: -- noting the discrepancy on the
14 signed verification paper document that we received a
15 copy of on 12/28, 2016, which was electronically
16 served.

17 And to note that Ms. Allen did state that she
18 did not believe the signature reflected in Exhibit C
19 was hers.

20 THE WITNESS: (Witness gesturing.) Looking
21 at the computer, one of them, and one of the other
22 ones, that's why I'm questioning it.

23 MS. SMITH: Understandable. I just need to
24 put my objections --

25 THE WITNESS: Okay.

1 MS. SMITH: -- on the record. You did say
2 that that didn't look like your signature in
3 Exhibit C.

4 THE WITNESS: Yeah.

5 Q. (BY MS. SMITH) Did you obtain any financing
6 in 2011?

7 A. (No response.)

8 Q. Based on your performances -- based on income
9 earned from your performances at Crazy Horse?

10 MS. CALVERT: Objection to form. Confusing.
11 Vague.

12 THE WITNESS: I agree.

13 Q. (BY MS. SMITH) Did you, in 2011, apply for
14 any financing, such as for a vehicle or a home?

15 A. Um, no.

16 Q. Okay. Any kind of a credit card or a charge
17 card --

18 A. No.

19 Q. -- in 2011?

20 A. I don't think so.

21 Q. Okay. And so even though that specific
22 log-in document, labeled Exhibit A, you said that does
23 not reflect some of the earlier times.

24 But you did confirm that that was the last
25 date that you believe you performed at the club.

1 A. Yes.

2 Q. Okay.

3 A. I'm just double-checking Exhibit B.

4 (Witness reading.) Um, yeah. This -- this should --
5 the Exhibit A shows 7/27/11.

6 And this Exhibit B shows 7/9, 2011. So
7 obviously, I worked there much longer, but it's not on
8 this.

9 Because maybe the -- I didn't get the next
10 read-out.

11 Q. Okay. So you think July 2011 though is
12 accurate?

13 A. July 27th, '11 is more accurate --

14 Q. Okay.

15 A. -- than July 9th.

16 Q. Okay. So on page 6 of Exhibit C, if you'll
17 just go ahead and look at that.

18 A. (Witness reading.)

19 Q. You answered interrogatory number 6 --

20 A. To July.

21 Q. -- to July 2011. So --

22 A. Yeah.

23 Q. -- you believe that to be accurate?

24 A. Yes.

25 Q. Okay. Do you believe that the tax return

1 you filed in 2011 would reflect specific amounts that
2 you earned from Crazy Horse?

3 A. Um, as extra income, yes.

4 Q. What would your other income be?

5 A. Cal -- uh, like my job.

6 Q. In 2011?

7 A. Oh, maybe not. Sorry. I think I started in
8 2012, so no. Just -- just for --

9 Q. Okay. So you started your current job in
10 2012?

11 A. Yeah, I think so. Yes.

12 Q. And you said that was commission-based?

13 A. Yes.

14 Q. Do you get any stipend for that?

15 A. (No response.)

16 Q. Any stipend or expenses?

17 A. (No response.)

18 Q. From that --

19 A. No.

20 Q. -- position? Okay.

21 A. No. Just commissions and --

22 Q. Okay.

23 A. -- bonuses.

24 Q. So in 2011, do you believe your only source
25 of income would have been from performing at Crazy

1 Horse?

2 A. Yeah.

3 Q. Okay. So any deductions you would have
4 taken for -- I think you mentioned --

5 A. Kids.

6 Q. -- clothes --

7 A. And clothes.

8 Q. -- or write-off for clothes and --

9 A. Kids and daycare.

10 Q. Okay.

11 A. Uh-huh.

12 Q. So that would be reflected on the 2011?

13 A. Yes.

14 Q. Okay. Did you have assistance in preparing
15 your tax return?

16 A. Like a tax person?

17 Q. For 2011? Yes.

18 A. Yes. Uh-huh.

19 Q. Who was that?

20 A. Um, Sue B. Her name is, S-u-e and B. That's
21 her name. No, just B.

22 Q. Oh.

23 A. It's the letter B.

24 Q. Okay.

25 A. I'm sure she --

1 Q. Does the --

2 A. -- has a --

3 Q. -- B --

4 A. -- normal last name, but I just know her as
5 Sue B.

6 Q. Do you have contact information for her?

7 A. Yes.

8 Q. Okay. Would you be able to provide that to
9 your attorney?

10 A. Yes.

11 Q. Okay. So I'm going to take you to
12 interrogatory response number 13. I believe it starts
13 on page 9 and goes into page 10.

14 A. Okay.

15 Q. And can you just read what your response
16 was?

17 A. My answer here?

18 Q. Yes, to number 13. I think you're looking
19 at --

20 A. (Witness reading.)

21 Q. I think you're looking at 12.

22 A. I'm looking here, 14. 13, 14.

23 Q. No.

24 A. Oh, line -- okay.

25 Q. Answer to interrogatory number 13 --

1 A. Oh.

2 Q. -- that starts on page 9 and goes --

3 A. Okay.

4 Q. -- onto page 10.

5 MS. CALVERT: Her pagination is off.

6 THE WITNESS: Yeah. Which question would
7 you --

8 MS. CALVERT: Or --

9 THE WITNESS: -- like me to read?

10 MS. CALVERT: I'm sorry. 13. So the answer
11 starting here. Sorry. And then it rolls over --

12 THE WITNESS: Right.

13 MS. CALVERT: Okay. Sorry.

14 MS. SMITH: Okay. No, it's fine. I just
15 wanted to make sure that --

16 MS. CALVERT: She just -- do you want her to
17 read it out loud?

18 THE WITNESS: I don't like reading out loud.

19 MS. CALVERT: Oh.

20 MS. SMITH: You can read it to yourself.

21 THE WITNESS: Okay. (Witness reading.) That
22 seems about right.

23 Q. (BY MS. SMITH) Okay. So --

24 A. Except for that day shift thing. I'm -- I
25 mean, I could have gotten that confused from your --

1 the first time --

2 Q. From --

3 A. -- that --

4 Q. -- previously.

5 A. Yeah. But absolutely, a hundred percent for
6 sure, they did -- they did tell me why -- they didn't
7 tell me why I couldn't go back to work when I checked
8 in that day.

9 And that's when I talked to the manager.
10 And he said let me -- give me a couple days, and I'll
11 get back to you.

12 Q. In 2011.

13 A. In 2011.

14 Q. So you were not assigned to day shift in
15 2011.

16 A. I don't think so.

17 Q. Okay.

18 A. No. I might have gotten myself confused
19 with the time frame on that. But all the other stuff
20 is right. Managers --

21 Q. Who told you that you were too old?

22 A. Um, when I went back in -- not during this
23 time frame, but when I went back to try to get
24 rehired, the guy at the back door -- I don't know who
25 it was.

1 Um, he's the person who looks at the ID and
2 everything and gives the permission for a manager to
3 come meet you and talk to you about whatever.

4 And at that time, he didn't let -- allow me
5 to talk to -- to anybody.

6 Q. So that --

7 A. So he --

8 Q. -- was not management.

9 A. That was not management, no.

10 Q. Okay.

11 Well, it could have been -- he called him on
12 the radio and talked to him. But I didn't hear that
13 conversation.

14 And he just said my name, and then he said
15 no. But they didn't give me a specific reason.

16 Except the guy at the door did tell me that
17 it could have been my age, why he didn't want me to
18 work there.

19 Q. So did management tell you you were too old?

20 A. The guy at -- at the door said that -- he
21 was giving speculations on why probably management
22 won't come talk to me.

23 Could have been my age, could be because you
24 were fired before. Could have been those kind of
25 things.

1 Q. Okay. So you don't really know.

2 A. No. That's what he -- that's what the guy
3 at the door told me.

4 But, yeah, no, I don't know for sure. But
5 that's, you know, speculation of -- of telling me I'm
6 too old to work there.

7 Q. Okay.

8 A. So those words were heard from -- in my
9 ears, that I was too old to work there.

10 Q. So -- okay. The next line that says
11 managers and hosts at the club black balled her?

12 A. Oh, yep.

13 Q. When did that occur?

14 A. Well, every time I went to go try to work
15 there again, they kept saying no to me. So it was
16 telling me that I couldn't work, that that was it.

17 All the other managers like no, she can't
18 work. When I mean -- when I -- when I say that, it
19 means that the main manager had told me that he was
20 going to ask all the other managers.

21 So those managers said no. So that's -- the
22 word I used was they black balled me from working
23 there.

24 Q. Okay. Do you know what a dance or diamond
25 dollar is?

1 A. Yes.

2 Q. How do you know it to be termed?

3 A. Uh -- um, VIP dollars, dance dollars. Um --
4 um, clubs call them their own thing. So DI dollars
5 or --

6 Q. At Crazy Horse, do you remember what they
7 were specifically called there?

8 A. No.

9 Q. Okay.

10 A. Not by memory --

11 Q. What do you understand that to mean for
12 Crazy Horse --

13 A. Uh, client --

14 Q. -- dance dollar?

15 A. Client pays with their credit card, and
16 dancer gets bills that way.

17 And turns it in and has to pay a ten percent
18 charge to get the balance of whatever the ten
19 percent --

20 Q. Okay.

21 A. -- charge is.

22 Q. And could you refuse to accept dance
23 dollars?

24 A. Um, yeah.

25 Q. Okay. Would you get reprimanded for

1 refusing dance dollars?

2 A. Um, sometimes. Because the club makes money
3 off of it both ways. They make money off the client.
4 They charge them a percentage.

5 And then they charge the dancer a
6 percentage. Again, not fair. Because I earned that
7 money.

8 So why should there be a charge, whether
9 it's on the credit card charge, and you're charging
10 the client already ten to 20 percent on the card, on
11 the dance dollars.

12 Why would the entertainer now have to do
13 that plus tip out on the dance dollars. Not fair.

14 Q. I'm sorry. When you say plus tip-out --

15 A. You have --

16 Q. -- on the --

17 A. -- to --

18 Q. -- dance dollars --

19 A. You have --

20 Q. -- is that --

21 A. -- tip out on the dance dollars as well. So
22 you get the dance dollars, that's the ten percent.
23 That's called the tip-out of the dance dollars.

24 Q. Okay. So you're referring to a single ten
25 percent of the dance dollars --

1 A. Yeah.

2 Q. -- that you --

3 A. Yes. And if you go into a --

4 Q. -- pay that.

5 A. -- VI -- yes. And if you go into a VIP
6 room, and you make this money.

7 And the host brings you the money, and they
8 hand you the money, all the girls, whatever it is.

9 Q. Uh-huh.

10 A. And he expects you to hand him one of the
11 20s or the hundreds or whatever that you made.

12 Q. Okay.

13 A. And if not, there was talk on the radio to
14 the other people, blah, blah, she didn't tip me, you
15 know.

16 Q. Okay. So was that ten percent, going back
17 to how we had discussed required versus expected, was
18 that --

19 A. The ten percent is required.

20 Q. Okay. And the VIP host was the expected.

21 A. Expected, yes.

22 MS. SMITH: Okay. Okay. I believe that is
23 all the questions that I have for you.

24 THE WITNESS: Okay.

25 MS. SMITH: Do you have anything, Counsel?

1 MS. CALVERT: No, I don't think so. I think
2 it all got covered. Okay.

3 THE COURT REPORTER: Lauren, did you want
4 copies?

5 MS. CALVERT: Yes. Of course. Just a --
6 e-copies.

7 (The deposition concluded at
8 4:06 p.m.)

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EXHIBIT “7”

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DISTRICT COURT

CLARK COUNTY, NEVADA

JACQUELINE FRANKLIN,)	
ASHLEIGH PARK, LILY SHEPHERD,)	
STACIE ALLEN, MICHAELA)	
DIVINE, VERONICA VAN WOODSEN,)	
SAMANTHA JONES, KARINA)	
STRELKOVA, LASHONDA, STEWART,)	Case No.
DANIELLE LAMAR, and DIRUBIN)	A-14-709372
TAMAYO, individually, and on)	
behalf of a class of)	
similarly situated)	
individuals,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
RUSSELL ROAD FOOD AND)	
BEVERAGE, LLC, a Nevada)	
limited Liability company)	. . .

DEPOSITION OF ASHLEIGH PARK

Taken on Friday, January 6, 2017

At 1:45 o'clock p.m.

At 630 South Fourth Street

Las Vegas, Nevada

Reported by: Helen M. Zamba, CCR #439

1 (d/b/a CRAZY HORSE III) . . .
2 GENTLEMAN'S CLUB), DOE CLUB)
3 OWNER, I-X, ROE CLUB OWNER,)
4 I-X, and ROE EMPLOYER, I-X,)
5 Defendants.)
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AND RELATED COUNTERCLAIMS)

1 APPEARANCES:

2 For the Plaintiffs:

LAUREN CALVERT, ESQ.
Morris Anderson
716 South Jones Boulevard
Las Vegas, Nevada 89107
(702) 333-1111

5 For the Defendants:

STEPHANIE J. SMITH, ESQ.
Moran Brandon Bendavid Moran
630 South Fourth Street
Las Vegas, Nevada 89101
(702) 384-8424

I N D E X

Witness	Direct	Cross	Red.	Rec.
Ashleigh Park				
(By Ms. Smith)	5			

EXHIBITS

Number	Description	Page
Deft's A	Entertainer Login By Date	
Deft's B	Entertainer Charge Summary	
Deft's C	Entertainer Login By Date	
Deft's D	Plaintiff Ashleigh Park's Answers to Defendant's Interrogatories	
Deft's E	Verification and Certificate of Service	

1 (Counsel stipulated to waive the
2 reporter requirements under
3 Rule 30(b)(4).)

4 Thereupon--

5 ASHLEIGH PARK
6 was called as a witness by the Defendants, and having
7 been first duly sworn, testified as follows:

8 DIRECT EXAMINATION

9 BY MS. SMITH:

10 Q. Good afternoon, Ms. Park. How are you?

11 A. I'm well. How are you?

12 Q. I'm doing well. Thanks.

13 So we just met off the record. As you know,
14 I'm representing Defendant Russell Road Food and
15 Beverage, doing business as Crazy Horse III
16 Gentleman's Club.

17 My name is Stephanie Smith. Feel free to
18 call me Stephanie if you have any questions.

19 A. Okay.

20 Q. You were just sworn in by the court
21 reporter.

22 That oath has the same weight as an oath
23 that you would take in a court of law and would
24 subject you to possibly penalty of perjury.

25 Do you understand that?

1 A. Yes.

2 Q. Okay. So here today during your deposition,
3 I'm going to be entitled to your best testimony.

4 So that means I would like you to estimate
5 if you can, if you need to answer a question, but I do
6 not want you to guess.

7 Do you know the difference between an
8 estimate and a guess?

9 A. Yes.

10 Q. All right. Let me just be a little clearer.
11 So if I asked you how tall your attorney, Ms. Calvert
12 was --

13 A. Uh-huh.

14 Q. -- you could probably take a look at her and
15 determine what height you thought she was.

16 A. Sure.

17 Q. If I asked you how tall my mom was, you've
18 never met my mom, never seen her --

19 A. I'd have to --

20 Q. -- so you'd --

21 A. -- guess.

22 Q. -- just be taking a guess.

23 A. Sure.

24 Q. Does that make sense?

25 A. Yes, absolutely.

1 Q. Okay. So after the deposition ends, at some
2 point you will receive a copy of the transcript, which
3 will be, you know, everything written down that we say
4 here today, when it's on the record.

5 And you will have the right to look at that
6 and, if necessary, make changes.

7 There might be some spaces left blank for
8 information, maybe filling in a year that you couldn't
9 remember.

10 Just so you know, if you change something
11 substantive, such as a yes to a no, then I'll most
12 likely be able to bring you back in here and question
13 you about the changes that you made that were
14 substantive.

15 All right?

16 A. Yes.

17 Q. Okay. You're doing a good job so far --

18 A. Thank --

19 Q. -- but --

20 A. You.

21 Q. -- since the court reporter is writing down
22 everything we say, it's important to try to make
23 verbal responses, such as okay, yes, no, maybe.

24 Nodding your head and saying huh-uh or nah
25 is common, and --

1 A. I understand.

2 Q. -- sometimes I'll do it too. So we'll just
3 try and avoid that.

4 A. Okay.

5 Q. I'm going to try and ask you clear
6 questions. They may not always make sense.

7 So if they don't, then feel free to ask me
8 what I mean or to -- if I could rephrase it for you.

9 From time to time, your attorney might have
10 objections to my questions.

11 So if you can, once I finish a question, try
12 to pause for a moment so that Ms. Calvert can make her
13 objection for the record.

14 However, then you would just go on and
15 answer the question, unless she specifically
16 instructed you not to. Okay?

17 A. Okay.

18 Q. That brings me to the next thing, which it's
19 really common to anticipate what I might ask you. You
20 might think you know where I'm going or want to shout
21 out the answer.

22 Try to refrain, because it's really
23 difficult for the court reporter to record two people
24 talking at the same time.

25 That being said, if it happens, it's okay.

1 We can just slow down and stop for a second and sort
2 things out. Okay?

3 A. Okay.

4 Q. Have you consumed any drugs or alcohol in
5 the last 12 hours?

6 A. No.

7 Q. Okay. Is there any reason that we can't go
8 forward today and get your best testimony?

9 A. No.

10 Q. All right. You also have the right to take
11 a break whenever you need one. I usually try to take
12 at least five minutes every hour.

13 Sometimes it might be a little longer or
14 shorter, depending. If you need to ask for one, go
15 ahead.

16 I would just ask that you refrain from
17 taking a break if there's a question pending.

18 All right?

19 A. Okay.

20 Q. Do you have any questions before we proceed?

21 A. No.

22 Q. Okay. Have you been deposed before?

23 A. Never.

24 Q. Okay.

25 A. Right.

1 Q. And then just for the record, can you state
2 and spell your full name?

3 A. Um, Ashleigh Marie Park, A-s-h-l-e-i-g-h,
4 M-a-r-i-e, P-a-r-k.

5 Q. All right. You're like me, a simple last
6 name.

7 A. Right.

8 Q. What's the highest level of education you've
9 received?

10 A. High school. Um, actually, it's a -- well,
11 high school diploma, yes.

12 Q. Okay.

13 A. It was taken through an online school, but
14 it's still a high school diploma.

15 Q. Okay. What online program?

16 A. Um, Penn Foster.

17 Q. Okay. What year did you obtain that?

18 A. 2007.

19 Q. Okay. Are you a U.S. citizen?

20 A. Yes.

21 Q. Okay. Do you file income taxes?

22 A. No.

23 Q. Have you ever filed income taxes?

24 A. I believe one year, I have.

25 Q. Do you know what year that was?

1 A. 2005.

2 Q. Okay. Is there a reason you do not file
3 income taxes?

4 A. Um, I -- no. Sorry.

5 Q. I'm going to ask you a little bit about your
6 previous history. This is prior to the first time you
7 ever went into Crazy Horse to perform. Okay?

8 A. Okay.

9 Q. Did you work at any clubs prior to Crazy
10 Horse?

11 A. Yes.

12 Q. And where did you perform at?

13 A. Uh, Sapphire and Hustler.

14 Q. Do you know approximately the time frame you
15 performed at Sapphire?

16 A. 2012, spring to -- spring of 2012 to I think
17 2014.

18 Q. And what about -- I'm sorry, you said
19 Hustler?

20 A. Uh-huh.

21 Q. What about the years you performed at
22 Hustler?

23 A. 2013.

24 Q. Okay. When did you first go into the club
25 Crazy Horse?

1 A. 2012.

2 Q. And was that to audition?

3 A. No.

4 Q. Okay. What was that for?

5 A. Uh, just going as a patron.

6 Q. Okay. When did you first audition for Crazy
7 Horse?

8 A. June of 2014.

9 Q. What made you choose to audition at Crazy
10 Horse?

11 A. I just heard it was a good club to work at.

12 Q. Okay. From other dancers?

13 A. Um, from a -- a friend.

14 Q. Okay. Did that friend perform there?

15 A. Uh, worked there. Didn't perform, but
16 worked there.

17 Q. What position did she have?

18 A. Um, a host.

19 Q. So when you went in to audition in June
20 2014, tell me what occurred.

21 A. Basically, I had a little bag I brought in
22 with me with my dance clothes in it.

23 I went into the -- the locker room, changed
24 into my clothes, and went out into the main room, um,
25 and danced for my audition with -- I was with a few

1 other girls.

2 Q. Okay. And what was the result of your
3 audition?

4 A. I got the job.

5 Q. Okay. Were you assigned to any specific
6 shift or a time you could be in the club?

7 A. No. I was told I could work any time.

8 Q. Okay.

9 A. Any day, any time.

10 Q. Sorry. Any day and time?

11 A. Uh-huh.

12 Q. Okay. Did anyone with Crazy Horse tell you
13 a minimum number of days that you would have to
14 perform?

15 A. I don't know. I don't remember.

16 Q. Okay. A minimum number of days you would
17 need to perform in a month?

18 A. I don't believe so, no.

19 Q. Okay. So if you could go into the club
20 whenever you chose to perform, how would you decide
21 when to go?

22 A. I basically just would -- whenever I felt
23 like going in, um, whatever worked with my schedule at
24 home at the time.

25 Q. Okay. Were there any specific days that you

1 would choose to perform?

2 A. I -- I don't remember, honestly.

3 Q. Okay.

4 A. I know weekends were better, but there's
5 more girls on weekends, so --

6 Q. Okay.

7 A. -- it just -- it depended on the week,
8 honestly.

9 Q. Okay. That makes sense. So if you were
10 going to go in for a shift at Crazy Horse, tell me
11 what you would do when you arrived.

12 A. I would go pull into the parking lot, valet
13 my car, walk inside, give my sheriff's card to the
14 person sitting at the window.

15 They'd look up my name. And depending on
16 what time it was, I'd have to pay a certain amount of
17 money to work --

18 Q. Okay.

19 A. -- between I think 50 and \$100. And then
20 I'd pay my money and go into the locker room.

21 Q. Okay. So do you recall what you were --
22 what you wore to audition?

23 A. No.

24 Q. Do you recall -- okay. Scratch that.

25 A. Okay.

1 Q. All right. Now, going forward, I'm going to
2 ask you what is going to seem like a million questions
3 about Crazy Horse specifically.

4 A. Uh-huh.

5 Q. And I'm going to try and do a good job of
6 differentiating. But sometimes I might refer to a
7 question as to whether something was mandatory.

8 And by that, I mean an actual -- what you
9 understood to be an actual rule versus expected.

10 A. Uh-huh.

11 Q. By that, I mean what you understood was just
12 kind of the way things were done.

13 Does that make sense?

14 A. Yes.

15 MS. CALVERT: And I'll object just as
16 argumentative.

17 Q. (BY MS. SMITH) Okay. Was there a minimum
18 amount of time that you were supposed to perform
19 during a shift?

20 A. Specify perform. Do you mean like from
21 clock-in to clock-out --

22 Q. Yes.

23 A. -- to be there or --

24 Q. Yes.

25 A. Yes.

1 Q. And what was that?

2 A. Six hours.

3 Q. And who told you that?

4 A. When I was hired, the -- one of the guys who
5 oversaw my audition and hired me --

6 Q. Uh-huh.

7 A. -- went over all that information with me.

8 Q. Okay. So was that mandatory, six hours?

9 A. Yes.

10 Q. Okay. Do you recall the names of any of the
11 individuals you auditioned for?

12 A. Shawn.

13 Q. What would happen if you wanted to perform
14 for longer than six hours?

15 A. I don't know of any issue with that.

16 Q. Okay. Would you perform for longer than six
17 hours?

18 A. Yes.

19 Q. Okay. Did anyone require you to stay eight
20 hours?

21 A. Not that I remember, no.

22 Q. Okay. Now, if you wanted to perform for
23 less than six hours, maybe you were just tired. All
24 right?

25 A. (Witness nodding head.)

1 Q. What would happen if you had not been on
2 premises for six hours?

3 A. You were supposed to be fined. And
4 depending -- possibly not allowed to come back to the
5 club, is the way that I understood that.

6 Q. Okay. Did you ever perform for less than
7 six hours?

8 A. Yes.

9 Q. Do you know about how many times?

10 A. Um, maybe three.

11 Q. Okay. What would -- do you recall what
12 happened during those three times?

13 A. Specifically, no.

14 Q. Okay. Do you recall the procedure you would
15 have gone through to be able to depart less than six
16 hours after you arrived?

17 A. I had to ask permission.

18 Q. And who would you ask permission from?

19 A. Whoever was available at the time, whether
20 it be the manager. Sometimes you could ask the -- the
21 VIP host.

22 Q. Okay. And then -- then what? You would
23 ask, and what would occur?

24 A. Either be told yes or no. Um, and I --
25 yeah. You'd either be told yes or no.

1 Q. Did you ever ask to leave the premises after
2 being there for less than six hours and be told no?

3 A. No.

4 Q. Okay. So for those approximately three
5 times that you can recall being on premises for less
6 than six hours -- and by being on premises, I mean
7 being at the club, if that makes sense, did you get
8 fined?

9 A. No.

10 Q. Okay. Do you know why?

11 A. No.

12 Q. Okay. Did --

13 A. No.

14 Q. Do you recall anyone threatening to fine
15 you?

16 A. I was told that if I left, I could be
17 subject to fine and to not be able to come back to the
18 club.

19 Q. Okay. But you don't recall actually being
20 fined?

21 A. Correct.

22 Q. Okay. And were you able to return to the
23 club?

24 A. Yes.

25 Q. Okay. So whenever you would go in to start

1 a shift, what were your goals during that time?

2 MS. CALVERT: Objection as to vague. You
3 can go ahead and answer.

4 THE WITNESS: To make money.

5 Q. (BY MS. SMITH) Okay. Did you have like a
6 certain dollar amount that you would aim to achieve
7 prior to checking out?

8 A. No.

9 Q. How about a number of individuals that you
10 wanted to talk to?

11 A. No.

12 Q. Okay. Did Crazy Horse require you to speak
13 to a certain number of individuals per shift?

14 A. Not that I remember, no.

15 Q. How about perform a certain number of lap
16 dances?

17 A. No.

18 Q. Okay. Did Crazy Horse have any quota for
19 how many people or parties you could bring to VIP --
20 or that you should be bringing to VIP?

21 A. No.

22 Q. Did Crazy Horse ever require you to work
23 more than 40 hours in a week?

24 A. No.

25 Q. Okay. If you had wanted to perform every

1 day, could you have?

2 A. Yes.

3 Q. Okay. Were there weeks that you didn't go
4 in at all to Crazy Horse?

5 A. Yes.

6 Q. Aside from what you testified to as a
7 six-hour minimum time, who would decide when you would
8 leave?

9 A. Ultimately, I would make that decision.
10 If --

11 Q. Okay.

12 A. If I was there for six hours, then I could
13 decide when I -- when I would leave.

14 Q. Okay. So after the six hours, what would
15 your process be for departing the premises?

16 A. Um, I believe I would go get a slip, and
17 the -- it had to be signed, basically.

18 And you had to be okayed to leave at that
19 point still by the VIP host and the manager.
20 Sometimes the house mom, but like she wasn't always
21 there.

22 Q. Okay.

23 A. And the DJ. Sorry. I forgot.

24 Q. Okay. And then what would happen?

25 A. Um, I would get my signatures, go -- and I

1 needed to be like off the floor and out the door in
2 a -- I think it was 30 minutes. Um, yeah.

3 Q. When you say off the floor and out the door
4 in 30 minutes, what do you mean by that?

5 A. Like off the dance floor, changed over into
6 my clothes, and basically gone home for the day or the
7 night.

8 Q. Thirty minutes from when?

9 A. From the time I got the signature.

10 Q. The first signature or the last signature?

11 A. Basic -- what I was told was when you're
12 signed out, so you need to be off the floor in 30
13 minutes.

14 Um, I would say the last signature.

15 Q. Okay. Who told you that?

16 A. Who told me that? When I was first hired,
17 the guy who went over all the paperwork with me --

18 Q. Okay.

19 A. -- and that.

20 Q. Did you ever take longer than 30 minutes to
21 exit the premises?

22 A. I don't believe so.

23 Q. Okay. So would you know what would happen
24 if you did take longer?

25 A. No.

1 Q. Would anyone contact you to require you to
2 come work a shift -- or to come perform during a
3 shift?

4 A. No.

5 Q. Okay. Did you have a business license in
6 2014?

7 A. Yes.

8 Q. What type of license would that be?

9 A. A State of Nevada business license. It's --
10 that's the only way I knew it, honestly.

11 Q. Do you know what classification of business
12 license?

13 A. I don't remember.

14 Q. Okay. And then you also had a sheriff's
15 card?

16 A. Yes.

17 Q. Okay. Do you still have a Nevada State
18 business license?

19 A. No. It's expired.

20 Q. Do you know when it expired?

21 A. Uh, 2015.

22 Q. Okay. How about a sheriff's card?

23 A. I do, yes.

24 Q. Okay. And is that currently valid?

25 A. I think until this year.

1 Q. Okay. Are you still performing as a dancer?

2 A. No.

3 Q. Okay. What do you do now?

4 A. I'm a stay-at-home mom currently. I just
5 had a baby.

6 Q. Congratulations.

7 A. Thank you.

8 Q. Do you have any other sources of income?

9 A. My husband supports the family.

10 Q. Okay. What about in 2016?

11 A. Uh-huh.

12 Q. Was that the same?

13 A. What?

14 Q. I'm sorry.

15 A. No, it's okay.

16 Q. In 2016, what were your sources of income?

17 A. 2016, um, my husband supported the family,
18 and I had some income as well.

19 Q. And what was your income from?

20 A. Um, I did a TV show.

21 Q. Oh. What TV show?

22 A. It's called 60 Days In.

23 Q. What is that?

24 A. I went undercover in a jail as an inmate to
25 basically help the sheriff clean the jail up.

1 Q. Sounds interesting.

2 A. Yeah. It was, to say the least, yes.

3 Q. Was that here in Las Vegas?

4 A. No.

5 Q. Where --

6 A. It was --

7 Q. -- was that at?

8 A. -- Jeffersonville, Indiana, just north of
9 Louisville, Kentucky.

10 Q. Okay.

11 A. Yeah.

12 Q. Where do you currently reside?

13 A. Here in Las Vegas.

14 Q. Okay. Aside from your 60 Days In --

15 A. Right.

16 Q. -- did you reside in Las Vegas in 2016?

17 A. It's -- um, yes.

18 Q. What about 2015?

19 A. No.

20 Q. Where did you reside in 2015?

21 A. Tennessee.

22 Q. Do you have the dates that you lived in
23 Tennessee?

24 A. March 2015 to July of 2016.

25 Q. What were your sources of income in

1 Tennessee?

2 A. I worked as a veterinary assistant.

3 Q. Did you do any dancing in Tennessee?

4 A. No.

5 Q. So prior to March of 2015, where did you
6 live?

7 A. Uh, Las Vegas.

8 Q. Okay. And do you know how long that stretch
9 was for?

10 A. We moved here August 2012 to March of 2015.

11 Q. Okay. What about before August 2012?

12 A. Tennessee.

13 Q. So what were your sources of income, aside
14 from dancing gentleman's clubs, between August 2012
15 and March of 2015?

16 A. My -- my personal --

17 Q. Yeah.

18 A. -- sources of income? That was -- that was
19 my main source of income during that time.

20 Q. Anything else?

21 A. I don't believe so.

22 Q. So when you started being a performer at
23 Crazy Horse specifically, did you agree to be an
24 independent contractor?

25 A. No.

1 Q. What did you agree to?

2 A. There was never talk of are you an
3 independent contractor or something else. It was just
4 you're hired on basically and here's your employment
5 paperwork.

6 Q. Did you ever ask about your status?

7 A. No, not -- I don't know. I don't remember.

8 Q. Do you know what the difference is between an
9 independent contractor and an employee?

10 MS. CALVERT: Objection. Calls for a legal
11 conclusion. Expert opinion. You can answer if you
12 know.

13 THE WITNESS: I was never explained the
14 difference.

15 MS. SMITH: Okay.

16 THE WITNESS: I would say that employees get
17 benefits and are a bit more protected, whereas an
18 independent contractor, you're supposed to work solely
19 for yourself.

20 Q. (BY MS. SMITH) Is that your current
21 understanding of what an employee and an independent
22 contractor is?

23 A. Yes.

24 Q. Anything else?

25 A. No.

1 Q. Any other differences?

2 MS. CALVERT: Objection. Asked and
3 answered.

4 THE WITNESS: I'm sure there are, but --

5 Q. (BY MS. SMITH) I'm just --

6 A. -- it's --

7 Q. -- asking for your -- from your
8 understanding.

9 A. No.

10 Q. Okay. What about at other clubs, had you
11 been an employee?

12 A. No.

13 Q. Do you know what you were?

14 A. (No response.)

15 Q. Or what you were classified as?

16 A. As an independent contractor.

17 Q. Okay. So in 2014, which I think you said --
18 okay. Sorry.

19 Did you only perform at Crazy Horse during
20 the year of 2014?

21 A. No.

22 Q. What other years do you think you performed
23 there?

24 A. Oh, I'm sorry. I misunderstood the
25 question. Did I only perform there during that year?

1 Q. Yes.

2 A. Okay. I thought you meant that a different
3 way.

4 Um, correct, yes, correct. That was -- 2014
5 was the only year.

6 Q. Okay. And then during 2014, did you perform
7 at other clubs --

8 A. That's --

9 Q. Okay.

10 A. -- what I was confusing.

11 Q. Right.

12 A. I'm sorry.

13 Q. No, that's fine.

14 A. I believe -- yes.

15 Q. Okay. So you were not required to only
16 perform at Crazy Horse; is that correct?

17 A. I don't know. I didn't work anywhere at the
18 same time. It was different months. So I never
19 worked at two clubs at one time.

20 Q. Okay. Why is that?

21 A. I didn't feel the need to.

22 Q. Okay. So in 2014, did you earn any income?

23 A. Yes.

24 Q. Do you have an approximation of how much?

25 A. No.

1 Q. Would the income you earned in 2014 only be
2 from your performing at Crazy Horse?

3 A. No.

4 Q. What other sources of income would you have
5 had in 2014?

6 A. The other clubs I danced at --

7 Q. Oh, okay.

8 A. -- or --

9 Q. Okay.

10 A. -- club I --

11 Q. Sorry. Okay. And did you report any of
12 that income to the IRS?

13 A. No.

14 Q. What about any other state, aside from
15 Nevada?

16 A. Did I file --

17 Q. Any tax returns in a different state, aside
18 from -- in a state that's not Nevada?

19 A. Not in 2014, no.

20 Q. Okay. Did you file any income tax with
21 respect to your business license?

22 A. No.

23 Q. Okay. Were you claimed as a dependent on
24 someone's income tax in 2014?

25 MS. CALVERT: Objection. Calls for

1 speculation. You can answer if you know.

2 THE WITNESS: I don't know.

3 Q. (BY MS. SMITH) Were you married in 2014?

4 A. I was, yes.

5 Q. Did you and your husband file a joint tax
6 return?

7 A. No.

8 Q. Do you know if he filed a tax return?

9 A. Yes.

10 Q. So do you know -- you don't know if you were
11 on it?

12 A. I -- no, I don't know.

13 Q. Okay. Did you inform your husband the
14 amount of earnings you had in 2014?

15 MS. CALVERT: Objection. I'm going to -- I
16 don't know if they can do the spousal privilege or
17 not.

18 MS. SMITH: I don't think so.

19 MS. CALVERT: My brain went sideways for a
20 second there.

21 I think to the extent it's -- it could be
22 used as incriminating as to, you know, filing -- her
23 husband filing her as a dependent when she was making
24 income or not, be privileged conversations that she
25 had solely with her husband.

1 MS. SMITH: But we're not in a proceeding
2 where that's even being pursued.

3 MS. CALVERT: You have to -- no, that's
4 true. You can answer if you know.

5 THE WITNESS: No, I did not inform him of
6 how much I earned.

7 Q. (BY MS. SMITH) Okay. Did you have any
8 expenses related to being a performer?

9 MS. CALVERT: Objection. Calls for an
10 expert opinion. You can answer if you know.

11 THE WITNESS: Yes.

12 Q. (BY MS. SMITH) What types of expenses?

13 A. Clothing, shoes. Um, travel, you know, to
14 and from work. Yeah.

15 Q. Do you know approximately how much you would
16 have spent on clothing and shoes?

17 A. No.

18 Q. For any year?

19 A. No.

20 Q. Okay. Are you aware of whether any of those
21 expenses were used as a write-off on taxes in -- for
22 2014?

23 MS. CALVERT: Objection. Vague and
24 confusing. She didn't file an income tax return.

25 THE WITNESS: Correct. So I -- can you

1 reask the question? They were not used as --

2 MS. SMITH: Okay.

3 THE WITNESS: -- expenses on my income tax
4 return because I didn't have one.

5 Q. (BY MS. SMITH) Okay. And not on, as far as
6 you know, one that your spouse would have filed at the
7 time?

8 A. Correct.

9 Q. Okay. Did you have any earnings from a
10 state other than Nevada in 2014?

11 A. No.

12 Q. Did you ever get any like head shots or
13 modeling promotional shots done?

14 A. For the club?

15 Q. Just for yourself as an entertainer.

16 A. No.

17 Q. Okay. How about for the club?

18 A. No.

19 Q. Okay. Did you ever promote yourself as a
20 dancer or entertainer?

21 A. No.

22 Q. Okay. How about for Crazy Horse, did you do
23 any promotional work for Crazy Horse?

24 A. I did not, no.

25 Q. Okay. Do you know if you were required to

1 advertise Crazy Horse?

2 A. No.

3 Q. When you would go in to perform on a
4 shift -- and again, this is for Crazy Horse --

5 A. Right.

6 Q. -- what types of supplies would you need?

7 A. My clothes, my shoes. Uh, makeup, hair
8 straightener, curling iron.

9 Q. Do you recall any requirements on outfits
10 that you could wear to perform?

11 A. Yes.

12 Q. And what were those?

13 A. You had to wear three undergarments, like a
14 bottom piece and then a middle and then something on
15 top.

16 Um, that's what -- that's what I distinctly
17 remember.

18 Q. Okay. So when you say three undergarments,
19 can you be a little bit more specific?

20 A. What I was told was I had to wear like a
21 thong --

22 Q. Okay.

23 A. -- three -- three -- two pair of underwear
24 and then whatever I was wearing on top, whether that
25 be a skirt or one piece. It just depended on what I

1 was wearing.

2 Q. Okay. So what two pairs of underwear would
3 you wear?

4 A. Just two pair of underwear, like two thongs.

5 Q. Okay. Two -- okay. I just -- I wasn't sure
6 if that meant, you know, one thong --

7 A. Yeah.

8 Q. -- and one pair of like boy short underwear
9 or something.

10 A. Uh-huh. No. Um, you weren't supposed to
11 show your butt. That didn't -- I mean, it was not
12 enforced.

13 Q. Okay.

14 A. Um, there were certain guidelines that were
15 just not enforced, so --

16 Q. Okay. So what other guidelines for the
17 outfits?

18 A. Um, no lace.

19 Q. Okay.

20 A. Um --

21 Q. Was that enforced?

22 A. No.

23 Q. Okay. What else?

24 A. Um, I can't remember anything else
25 specifically. Just those.

1 Q. Okay. Other than the three pieces that you
2 just referenced --

3 A. Uh-huh.

4 Q. -- and the lace requirement -- or I should
5 say ban --

6 MS. CALVERT: Yes.

7 Q. (BY MS. SMITH) -- how would you decide what
8 to wear? Would you choose your own outfits?

9 A. Yes.

10 Q. Okay. When you would commence a shift at
11 Crazy Horse, would you need to get your outfit
12 approved by anyone there?

13 A. Yes.

14 Q. Who?

15 A. The house mom.

16 Q. Okay.

17 A. When she was there. She wasn't always
18 there.

19 So when there was someone in there, at least
20 for me specifically, she would make sure that I was
21 wearing what I was supposed to be wearing.

22 Q. Okay. And how about when she wasn't there?

23 A. No one that I can remember.

24 Q. Okay. Is it your understanding that the
25 house mom is employed by Crazy Horse?

1 A. I don't know.

2 Q. Okay. Are you aware of any laws in place by
3 the State of Nevada or of Clark County placed on
4 dancers?

5 A. No.

6 Q. Do you know of any laws that gentleman's
7 clubs are supposed to abide by?

8 A. I don't. I'm not --

9 Q. Okay.

10 A. I'm not a lawyer though either, so I
11 don't -- I don't know.

12 Q. Okay. Did you have a stage name?

13 A. Yes.

14 Q. And what was that?

15 A. Amber Rose.

16 Q. How did you choose that?

17 A. I don't remember.

18 Q. Okay. Did you use that stage name at other
19 clubs?

20 A. No.

21 Q. What were some of the other stage names you
22 would use?

23 A. Um, Courtney, Lacy, and -- I don't recall
24 any others. I'm sorry.

25 Q. Okay. You don't have to apologize.

1 Did you have to get your name approved by
2 anyone at Crazy Horse?

3 A. I don't remember.

4 Q. So during your shift, once you were on the
5 main floor, how would you approach an individual that
6 came into the club?

7 A. How would I approach? I would just walk up
8 to someone and start talking.

9 Q. Okay. And any specific topics of
10 conversation that you would use?

11 A. No.

12 Q. Okay. What about asking them if they would
13 like a dance?

14 A. I -- what do you mean by the question?

15 Q. Do you know what a lap dance is?

16 A. I -- yes.

17 Q. What's your understanding of what a lap
18 dance is?

19 A. Um, dancing on someone's lap.

20 Q. Did you ever perform lap dances while you
21 were performing at Crazy Horse?

22 A. Yes.

23 Q. How would you go about doing that?

24 A. Uh, in conversation with someone, it
25 obviously comes to a point where someone's there for a

1 reason.

2 They're there to get a dance or have
3 conversation, and you're there to make money. So you
4 would -- either they would ask you for a dance or you
5 would ask them for a dance.

6 Q. Okay.

7 A. Ask them if they wanted it.

8 Q. So if you asked someone if they wanted a
9 dance and they said yes, what would happen next?

10 A. Um, for me, I would get my money up front
11 and do the dance.

12 Q. Okay. How much money would you get up
13 front?

14 A. For a lap dance?

15 Q. Yes.

16 A. It's \$20. Um, depending on how they paid.

17 Q. What do you mean, depending on how they
18 paid?

19 A. It -- \$20 cash. Or if they paid in dance
20 dollars, then you'd get less than that.

21 Q. Okay. Did you ever refuse dance dollars?

22 A. No.

23 Q. How come?

24 A. Why would I refuse money? It's -- something
25 is better than nothing.

1 Q. Could you have refused dance dollars?

2 MS. CALVERT: Calls for speculation. Answer
3 if you know.

4 THE WITNESS: I could have.

5 Q. (BY MS. SMITH) Did you ever negotiate for
6 more than \$20 for a lap dance?

7 A. No.

8 Q. How come?

9 A. There were set prices at the club. You had
10 to follow that.

11 Q. Did you ever ask anyone if you could
12 negotiate for the price of a lap dance?

13 A. I didn't have a conversation with someone
14 about it, but it was in my rules that I signed, so --

15 Q. Okay. But you never asked if you could --
16 you never asked any like manager that you could -- if
17 you could ask a customer for more than \$20 for a lap
18 dance?

19 A. Correct.

20 Q. Okay. During conversation with a -- an
21 individual, would you ever try to get them to go into
22 a VIP area?

23 A. Of course, yes.

24 Q. Okay. Can you describe to me how that
25 conversation would occur?

1 A. It could be, you know, different ways. But
2 basically, you just explain to them that there's a
3 more private area, if they were interested.

4 And go about explaining the prices and, you
5 know, the difference between a dance on the floor and
6 a -- and a private room.

7 Q. Okay. And what else?

8 A. That's basically it.

9 Q. And how much would you charge for going into
10 the VIP area?

11 A. From what I remember, it was \$100 for three
12 dances, 200 for half an hour.

13 Q. Did you ever ask for more than those
14 amounts?

15 A. No.

16 Q. How come?

17 A. Again, those were the set prices. So I
18 wasn't trying to set my own price. I wasn't --

19 Q. How come?

20 A. I -- I didn't have that option.

21 Q. What are you basing the statement that you
22 didn't have that option on?

23 A. When I was working for the club, my
24 understanding was that those were the prices. And, I
25 mean, if they were to pay, that's how much they would

1 pay.

2 If they were to pay by credit card, they
3 wouldn't pay more than that.

4 Q. Okay. Did you ever ask anyone if you could
5 negotiate for more than that?

6 A. No.

7 Q. Okay. Going back to where you were -- would
8 come on for a shift, were there any requirements about
9 hair and makeup?

10 A. Yes.

11 Q. What were those?

12 A. There were several. Um, no glitter, no oil.

13 Q. Okay.

14 A. Uh, those were the two biggest that I saw
15 enforced.

16 Q. Okay. Do you know why that those were
17 enforced?

18 A. Um, no.

19 Q. What were other rules that you thought were
20 required with your hair and makeup?

21 A. Nothing that I can recall.

22 Q. Okay. Did you ever get fined for your
23 appearance at Crazy Horse?

24 A. No.

25 Q. Did you ever perform on a stage at Crazy

1 Horse?

2 A. Yes.

3 Q. Okay. How would you decide what song to
4 dance to?

5 A. I -- I didn't decide that.

6 Q. Okay. How is it decided then?

7 A. Um, the DJ just -- I -- just played the
8 music. I -- I never asked for anything specific.

9 Q. Okay. So you just didn't request a specific
10 genre?

11 A. Uh, I did not.

12 Q. Any specific song?

13 A. No.

14 Q. Okay. Is there any specific -- sorry. Is
15 there any specific style that you would perform on
16 stage, style of dance?

17 A. Uh, no.

18 Q. Okay. Did anyone at Crazy Horse instruct
19 you in the style of dance you were supposed to be
20 performing?

21 A. I didn't -- I guess I didn't need
22 instruction. But not -- not specifically, no.

23 Q. Okay. Would you utilize a pole on stage?

24 A. Yes.

25 Q. Okay. How did you learn how to dance with a

1 pole?

2 A. Um, I took pole fitness classes before I got
3 into dancing.

4 Q. Did you have any other dance training?

5 A. No. Just that.

6 Q. Okay. I've heard that's a good workout.

7 A. Excellent, yes.

8 Q. If you just wanted to dance on stage during
9 a shift or dance periodically on stage, would you have
10 been allowed to?

11 A. Just dance on stage?

12 Q. Yes.

13 A. Like not do anything else?

14 Q. Yes.

15 A. Um --

16 MS. CALVERT: Objection. Calls for
17 speculation. You can answer.

18 THE WITNESS: Yeah, I don't know.

19 Q. (BY MS. SMITH) Okay. What about if you
20 only wanted to give private dances in the VIP area,
21 could you do that?

22 A. Uh, yes.

23 Q. What if you went into a shift and just
24 wanted to hang out in the dressing room, could you do
25 that?

1 A. No.

2 Q. How come?

3 A. You're there to work.

4 Q. Would someone come and get you out of the
5 dressing room?

6 A. That never happened to me specifically, no.

7 Q. Okay. Because you would go in and obviously
8 want to try to make money --

9 A. Uh-huh.

10 Q. -- correct?

11 A. Yes.

12 Q. Okay. Were there any specific areas of the
13 club that you preferred to hang out in?

14 A. No.

15 Q. Would you ever go sit at the bar?

16 A. Yes.

17 Q. Would you ever consume alcohol on shift?

18 A. No.

19 Q. Did Crazy Horse have any requirements of
20 where you could approach a customer?

21 A. No.

22 Q. Okay. What about how long -- did Crazy
23 Horse have any requirements about how long you were
24 supposed to talk to a single individual?

25 A. Yes.

1 Q. What were those?

2 A. If -- if there wasn't going to be a sale
3 made, they wanted you to keep moving on to the next
4 person.

5 Um, I was told specifically by hosts, when
6 they saw nothing was happening, to move to someone
7 else.

8 Q. After how long would that occur?

9 A. Maybe ten minutes.

10 Q. Okay. What would happen if you didn't move
11 on after that ten minutes?

12 A. You'd -- I was -- I was never approached
13 again by that -- by the host, when this happened.

14 But they obviously knew you weren't, you
15 know, listening to them. So then you'd have someone
16 that was upset with you.

17 Q. Okay. But other than that, anything else?

18 A. No.

19 Q. Okay. Any other requirements on you during
20 a shift on where you could hang out in the club?

21 A. Yes.

22 Q. What were those?

23 A. You couldn't just hang out in the VIP room.
24 If you weren't back there with a customer, you
25 couldn't hang out.

1 Um, I mean, you just couldn't hang out
2 anywhere if you -- I don't know. That's it. You --
3 you just couldn't hang out in the VIP areas --

4 Q. Okay.

5 A. -- if you didn't have someone there with
6 you.

7 Q. Okay. What about if you wanted to take a
8 break, what would happen?

9 A. You could take a break.

10 Q. Would you need to check in with anybody
11 prior to commencing your break?

12 A. No.

13 Q. What about checking in after you finished
14 taking a break?

15 A. No.

16 Q. What about any requirements by Crazy Horse
17 on how long of a break you could take?

18 A. I believe there was a time limit, but I
19 don't remember the exact time.

20 Q. Okay. What about a limit on how many breaks
21 you could take throughout the evening?

22 A. I don't know.

23 Q. Okay. When you would take a break, did you
24 ever experience someone coming and telling you to stop
25 taking a break?

1 A. I had -- yes.

2 Q. When did that occur?

3 A. Um, once I was going to take a break, was
4 walking to the back, and was stopped by a host who
5 asked me what I was doing.

6 I told him that I was going to take a break,
7 and he said that I didn't need to go take a break
8 right then.

9 Q. Did you still go and take a break, or did
10 you not take a break then?

11 A. I did not take a break.

12 Q. How come?

13 A. He directed me toward a group of people that
14 he thought were -- was going to spend money. And
15 that's where I went.

16 Q. Did they spend any money?

17 A. Yes.

18 Q. Okay. Other than that one time, any other
19 times?

20 A. Not that I can recall.

21 Q. Okay. If you were already taking a break,
22 would anyone come and get you to cut it short?

23 MS. CALVERT: Objection. Asked and
24 answered. You can answer.

25 THE WITNESS: No.

1 Q. (BY MS. SMITH) Would you ever ask to go on
2 stage?

3 A. Not that I can remember.

4 MS. SMITH: All right. I'm going to just
5 take a brief break right now and just take five.

6 MS. CALVERT: Sounds good.

7 THE WITNESS: Okay.

8 (Short recess taken.)

9 MS. SMITH: All right. Ms. Park, we're back
10 on the record. And the oath that you took earlier
11 today is still in effect. Okay?

12 THE WITNESS: Yes.

13 MS. SMITH: And that's going to carry on
14 throughout the rest of the deposition. If we take
15 another break, I'm sure I'll mention it again.

16 THE WITNESS: Okay.

17 Q. (BY MS. SMITH) Okay. So we were just
18 speaking about your breaks.

19 You identified one instance where a host
20 directed you not to take a break. Other than that,
21 you were free to take breaks?

22 A. Correct.

23 Q. Did anyone at Crazy Horse require you to tip
24 anyone?

25 A. No.

1 Q. Okay. Do you know if anyone at Crazy Horse
2 was monitoring the way you danced in the main floor
3 area?

4 A. Yes.

5 Q. And who would be doing that?

6 A. The VIP hosts, the men that would walk
7 around --

8 Q. Okay.

9 A. -- the room.

10 Q. Do you know what they were monitoring you
11 for?

12 A. Yes.

13 Q. What?

14 A. To make sure that you were dancing the way
15 that you were supposed to be dancing.

16 Q. What do you mean by that?

17 A. There were certain things you couldn't do
18 when dancing on the floor.

19 Q. Do you have an example of those things?

20 A. Um, during a lap dance, you were not -- you
21 had to keep one foot on the floor, couldn't lift both
22 of your feet off the floor and, you know, straddle
23 someone's neck or something.

24 Q. Okay.

25 A. One -- always one foot on the floor. And

1 that was absolutely enforced.

2 Q. Okay.

3 A. Um, that's the only thing I ever got, um,
4 talked to about.

5 Q. Okay. Were you fined for that?

6 A. I was warned.

7 Q. Okay. Were you fined for anything else at
8 Crazy Horse?

9 A. No.

10 Q. Would you ever pay a fee to dance --
11 sorry -- to avoid dancing on stage?

12 A. I did not personally, no.

13 Q. Okay. Could you have requested to not go on
14 stage?

15 A. Yes.

16 Q. Do you have an estimate as to how much money
17 you would earn per shift at Crazy Horse?

18 A. No.

19 Q. Do you have a range at all?

20 A. Between zero or negative and \$2,000.

21 Q. Okay. Did you have your own customer base?

22 A. No.

23 Q. Okay. Did you have any regular individuals
24 that would come and see you?

25 A. One, yes.

1 Q. And how would you contact that person?

2 A. Just when he came into the club.

3 Q. Okay. So just he -- did you let him know
4 what days you normally worked or what days you would
5 normally perform?

6 A. No.

7 Q. Would that individual come and see you at
8 other clubs?

9 A. No.

10 Q. Only at Crazy Horse.

11 A. Yes.

12 Q. Did you meet that individual at Crazy Horse?

13 A. Yes.

14 Q. Did you ever date anyone at Crazy Horse?

15 A. No.

16 Q. Did you ever leave Crazy Horse premises with
17 any customers?

18 A. No.

19 Q. Did you ever make arrangements, during a
20 shift, to meet up with a Crazy Horse customer after
21 your shift was done?

22 A. No.

23 Q. Okay. Have you ever been cited for
24 solicitation?

25 A. No.

1 Q. Do you know what I mean by solicitation?

2 A. Prostitution.

3 Q. Okay.

4 A. Yes, I do.

5 Q. All right.

6 A. And no, I have not.

7 Q. Okay. Do you think you were a good
8 entertainer?

9 A. Yes.

10 Q. Why is that?

11 A. I -- anything I do, I try to do as well as I
12 can. And I -- I'd like to say that I was successful
13 at it.

14 Q. Do you think you were better than the
15 average entertainer you knew?

16 A. No.

17 Q. Do you think you were worse?

18 A. No.

19 Q. Okay. Did you have any specialty dance
20 moves?

21 A. No.

22 Q. Okay. Aside from the pole fitness classes
23 that you testified to previously, would you practice
24 your dancing or your pole dancing?

25 A. No.

1 Q. During the time you were performing at Crazy
2 Horse, did you ever ask for anyone there to pay you
3 wages?

4 A. No.

5 Q. How come?

6 A. I didn't know I had the option.

7 Q. Are you aware of whether Crazy Horse did any
8 promotional activities or events outside of the club
9 premises?

10 A. I don't know.

11 Q. Okay. So if they did, you wouldn't have
12 gone on them?

13 MS. CALVERT: Objection. Calls for
14 speculation. You can answer.

15 THE WITNESS: I don't -- I don't recall
16 being offered to do that.

17 MS. SMITH: Okay.

18 THE WITNESS: I tried to keep my business
19 inside the club if I could.

20 Q. (BY MS. SMITH) Okay. Did you ever ask
21 anyone at Crazy Horse to become an employee?

22 MS. CALVERT: Objection. Asked and
23 answered. You can respond.

24 THE WITNESS: No.

25 Q. (BY MS. SMITH) What about being hired on as

1 like a host, such as your friend?

2 A. No.

3 Q. Any reason why you didn't?

4 A. The -- the employee part, I didn't know I
5 had the option. Um, I had no interest in hosting.

6 Q. Why is that?

7 A. Because I was a dancer.

8 Q. What about cocktailing?

9 A. I didn't drink, so I didn't want to handle
10 alcohol.

11 Q. Okay. Aside from adult gentleman's clubs,
12 where else would you be qualified to be a dancer?

13 MS. CALVERT: Objection. Calls for
14 speculation. You can answer if you know.

15 THE WITNESS: I don't know.

16 Q. (BY MS. SMITH) Did you ever hire any
17 assistants to help you with hair or makeup?

18 A. No.

19 Q. What about costumes?

20 A. No.

21 Q. Did you need to report to any individual at
22 Crazy Horse during your shift?

23 MS. CALVERT: Objection. Vague.

24 THE WITNESS: Yeah, I don't -- it's -- yes.

25 Q. (BY MS. SMITH) Who?

1 A. If I went into VIP, I would have to report
2 to the VIP host --

3 Q. Okay.

4 A. -- during the shift. Um, I -- I would have
5 to report to the DJ, the VIP host, and the manager
6 during my shift before I could -- before my shift was
7 ended technically, so --

8 Q. Okay. So aside from checking in and
9 checking out, I'm just referring to that period of
10 time.

11 A. No.

12 Q. Okay. Did you have to inform anyone at
13 Crazy Horse the total amount of money you earned
14 during a shift?

15 A. No.

16 Q. Okay. Why did you choose to stop performing
17 at Crazy Horse?

18 A. A couple of reasons. I got married in late
19 2014. And we decided that it wasn't something I
20 needed to be doing anymore in a marriage.

21 And the last time I performed, that kind of
22 sent me over the edge. I was in a private, private
23 room, like an hour-long room.

24 And the other performer I was in there with
25 ended up having sex right in front of me.

1 And it was going on when they came in to
2 give the five-minute warning to say, you know, you
3 only have five minutes left or whatever the host came
4 in to come in for.

5 And I -- I just -- it ended up being just
6 too much for me.

7 Q. Okay. And that occurred at Crazy Horse?

8 A. Yes.

9 Q. Was Crazy Horse the last club that you
10 performed at?

11 A. Yes.

12 Q. Okay. So that was your last time ever?

13 A. Yes.

14 Q. Okay. What made you decide to join this
15 lawsuit?

16 A. I -- I have a lot of respect for dancers,
17 and I feel like it's a very hard career to be in.

18 And so I feel like if I could be a voice to
19 help other women get the justice they deserve, then --
20 then I -- that's why I wanted to be a part of it.

21 Q. Okay. Do you know when you originally
22 joined this lawsuit?

23 A. 2014. Um, specifically, I'm not -- I'm not
24 sure of the exact date.

25 Q. Okay. Do you recall if you joined the

1 lawsuit after the last time you performed at Crazy
2 Horse?

3 A. Yes, it was after.

4 Q. Okay. Are you involved in any other
5 lawsuits in Nevada?

6 A. Um, yes.

7 Q. What lawsuits?

8 A. Uh, the Hustler Club.

9 Q. Okay. Is that -- are you making similar
10 claims against the Hustler Club as you are in this
11 lawsuit?

12 A. Yes.

13 Q. Are you a named plaintiff in that lawsuit?

14 A. Yes.

15 Q. Okay. What about any other lawsuits?

16 A. I -- I don't believe so.

17 Q. Okay. Have you previously been a part of
18 any lawsuits in Las Vegas or in Nevada?

19 A. Yes.

20 Q. What lawsuits were those?

21 A. The Sapphire case.

22 Q. Okay.

23 A. I'm not sure where that stands right now,
24 so --

25 Q. Okay. Did you receive any money from the

1 Sapphire case?

2 A. No.

3 Q. Have you received any money from the Hustler
4 case?

5 A. No.

6 Q. Were you deposed in the Sapphire case?

7 A. No.

8 Q. Do you know when the Hustler case commenced?

9 A. I do not.

10 Q. Do you know when you joined it?

11 A. The same time frame, I believe.

12 Q. Okay. What about the Sapphire case?

13 A. I think it was all around the same.

14 Q. Okay. Who do you understand your legal
15 counsel to be?

16 A. In this case?

17 Q. Yes.

18 A. Um, Lauren.

19 Q. Do you know the name of a law firm?

20 A. Um, it was Morris Anderson Law Firm when --
21 back in 2014, so --

22 Q. Okay.

23 A. -- I assume it's the same.

24 Q. Any other law firm?

25 A. No.

1 Q. Okay. How did you first get in touch with
2 Morris Anderson?

3 A. Um, I believe I made a phone call.

4 Q. Okay. So you reached out to them?

5 A. Yes.

6 Q. And what made you call an attorney?

7 A. I had a friend that had kind of let me know,
8 um, that there was a case that was starting up. And
9 so I called to basically get involved in it.

10 Q. Okay. Were you promised any monetary
11 settlement?

12 A. Absolutely not.

13 Q. And what do you hope to achieve with this
14 lawsuit?

15 A. Um --

16 MS. CALVERT: Objection. Calls for a legal
17 conclusion. You can go ahead and answer.

18 THE WITNESS: From the personal experiences
19 I had in the club that were negative, I hope that
20 it -- if nothing else, the clubs have to change some
21 of their standards.

22 Q. (BY MS. SMITH) Okay. Specific to Crazy
23 Horse, what are you hoping to achieve?

24 A. Just that if, um -- just justice.

25 Q. How about money?

1 A. Am I hoping to achieve money?

2 Q. Are you hoping to get some money?

3 A. No.

4 Q. Okay. Do you have an estimate as to how
5 much you personally paid to Crazy Horse in house fees?

6 A. Yes.

7 Q. How much?

8 A. Fourteen hundred dollars or so.

9 Q. Do you have any receipts from your shifts at
10 Crazy Horse?

11 A. No.

12 Q. Any other documents from your time there?

13 A. No.

14 Q. Do you know what club tracks is?

15 A. Club tracks?

16 Q. Yes.

17 A. I've never heard of it.

18 Q. Are you aware that the Nevada legislature
19 has recently passed legislation regarding persons
20 presumed to be independent contractors?

21 A. No.

22 MS. SMITH: Let's go off the record for a
23 second. I just want to --

24 (Short recess taken.)

25 MS. SMITH: All right. Ms. Park, we're back

1 on the record.

2 THE WITNESS: Okay.

3 MS. SMITH: Just to remind you, the oath is
4 still in effect.

5 THE WITNESS: Yes.

6 Q. (BY MS. SMITH) I'm going to show you some
7 documents.

8 Okay. I'm not actuality going to attach
9 this to your deposition transcript, because it does
10 reflect your full Social Security number.

11 A. Okay.

12 Q. But I'm just going to have you look at it
13 and --

14 A. Okay, sure.

15 Q. -- and verify that information.

16 A. That it's accurate?

17 Q. Yeah.

18 A. Um -- (Witness reading.) Yes. It looks
19 right -- oh, and that's a lovely picture of me.

20 Q. It's just in black and white.

21 A. Yeah.

22 MS. SMITH: Just so that the record
23 accurately reflects, deponent looked at documents
24 Bates labeled RR0069 and RR0070, which have previously
25 been produced in this lawsuit.

1 And I'm going to have the reporter mark two
2 exhibits. RR0071 and RR0072. 71 will be Exhibit A.
3 And 72 will be Exhibit B.

4 (Defendant's Exhibits A and B were
5 marked for identification.)

6 Q. (BY MS. SMITH) Okay, Ms. Park. I'm going to
7 give you a second to look those over.

8 A. Yes.

9 Q. Have you seen either of those documents
10 before?

11 A. Yes, I have.

12 Q. Did you receive them from your counsel?

13 A. I did, yes.

14 MS. SMITH: Okay. Hang on. Can we go off
15 record for a minute?

16 (Discussion off the record.)

17 (Defendant's Exhibit C was marked for
18 identification.)

19 Q. (BY MS. SMITH) Ms. Park, I just had the
20 court reporter mark a document as Exhibit C. That
21 document was also previously disclosed in this
22 litigation.

23 I believe it was in an Excel spreadsheet
24 form. And that was Bates stamped RR0608. This format
25 I believe reflects the exact same information as is

1 reflected in Exhibit A.

2 A. Okay.

3 Q. The numbers are a little bit larger and
4 clearer on Exhibit C. So --

5 A. Right.

6 Q. When you compare the two, does that look to
7 be the same information on both Exhibit A and
8 Exhibit C?

9 A. (Witness reading.) Except for the time --
10 the charges at the bottom, it's totaled.

11 Q. Okay. But the log-in information --

12 A. Correct.

13 Q. -- and the total time?

14 A. Yes. That's -- that is the same, yes.

15 Q. Okay. Do you think that Exhibit A and
16 Exhibit C accurately reflect the dates and times that
17 you performed at Crazy Horse?

18 A. (Witness reading.) Yes.

19 Q. Okay. Any reason to doubt this being an
20 accurate record of the dates and times you worked?

21 A. No.

22 Q. Okay. And I'm going to refer you over to
23 Exhibit B.

24 A. Okay.

25 Q. Does that appear to be an accurate

1 reflection of the charges assessed to you and paid by
2 you to Crazy Horse?

3 A. (Witness reading.) Yes.

4 Q. Okay. Any reason to doubt that this is an
5 accurate reflection of those charges and payments?

6 A. No.

7 Q. Okay. On the first night, reflecting
8 June 12th, 2014, do you believe that was the first
9 date that you performed at Crazy Horse?

10 A. Yes.

11 Q. And do you recall being comped that initial
12 house fee?

13 A. I do not recall that.

14 Q. Do you have any reason to doubt that you
15 were?

16 A. No.

17 Q. Okay.

18 A. There is -- there are several dates missing
19 on it though, on the Exhibit B. Am I -- is that
20 correct?

21 I don't know if it matters, but it just --
22 there's -- I worked more than five days. That's all
23 it shows.

24 Q. Okay.

25 A. So I -- I just don't know if it matters or

1 not. But all my fees are not on there, so --

2 Q. Okay.

3 A. Right?

4 Q. So you think that the information in
5 Exhibit A and Exhibit C more accurately reflects
6 the --

7 A. Correct.

8 Q. -- times?

9 A. Yes.

10 Q. Okay. So you think that the last time that
11 you performed at Crazy Horse was October 4th, 2014?

12 A. (Witness reading.) Yes.

13 Q. Is there any reason that you did not perform
14 at Crazy Horse between June 30th, 2014 and
15 September 29th, 2014?

16 A. Yes.

17 Q. What was that?

18 A. That was when I got married.

19 Q. Oh.

20 A. Uh-huh.

21 Q. Well, belated congratulations.

22 A. Thanks, if you could say that.

23 Q. What about --

24 A. Sure.

25 Q. -- from -- what about the month in

1 between -- well, sorry. I guess it was not after that
2 many days --

3 A. Right.

4 Q. -- between 9/29 and 10/4.

5 A. Correct.

6 Q. Okay. The log-in time and log-out time of
7 the first shift, dated 6/12, 2014, reflects, in the
8 far right column, 3.55 hours.

9 Do you see that?

10 A. Yes.

11 Q. Do you recall working for 3.5 -- or
12 performing for 3.55 hours?

13 A. A -- around, yes.

14 Q. Okay. So would that have been one of the
15 times that you requested to check out early?

16 A. No.

17 Q. Why do you think you were only there for
18 3.55 hours?

19 A. It was my first night. And they basically
20 gave me a pass for the first night and said you can,
21 you know, see how you like it and stay basically on
22 your own time for that night.

23 So that's just -- that's -- that was the
24 reason for that.

25 Q. Okay. What about the entry dated 6/25/14?

1 Do you see how many hours it reflects?

2 A. 2.75, yes.

3 Q. Do you recall that shift?

4 A. I -- no.

5 Q. Okay. Do you recall checking back in what
6 appears to be later on on 6/25, 2014?

7 A. (Witness reading.) I -- I don't recall the
8 exact day, but yes, I -- I do see that.

9 Q. Okay. Do you think that that's what
10 occurred?

11 A. Yes.

12 Q. Okay. I'm just going to have you refer to
13 Exhibit B.

14 A. Okay.

15 Q. The entries dated 6/25. Can you tell me
16 what that reflects?

17 A. A 50 dollar house fee. And also a payment
18 of \$50.

19 Q. Okay. So would it be your understanding of
20 these exhibits that you were only charged one house
21 fee for all of 6/25, 2014?

22 A. (Witness reading.) No.

23 Q. Okay. What is your understanding then?

24 A. What I see is that there's several days
25 missing from that.

1 So I -- I just -- I wouldn't -- I wouldn't
2 have been let in for free. I know that. I always
3 paid a house fee.

4 So I just -- I don't see it on there. But I
5 don't see other days on there as well.

6 Q. Okay. If you checked out and checked back
7 in within the same 24-hour period, would you have to
8 pay two house fees?

9 A. I -- I don't know.

10 Q. Do you ever recall that happening?

11 A. I don't recall that, huh-uh.

12 Q. Okay.

13 A. That may have very -- very well been the
14 case. But I -- I do not remember.

15 MS. SMITH: Okay. That's fine. Okay. All
16 right. I'm going to have the court reporter mark one
17 more exhibit.

18 (Defendant's Exhibit D was marked for
19 identification.)

20 Q. (BY MS. SMITH) Ms. Park, please take a
21 minute to look over this document.

22 A. (Witness reading.) Okay.

23 Q. Have you seen that document before?

24 A. Yes.

25 Q. And when did you first see it?

1 A. Um, I think December 28th, I believe.

2 MS. SMITH: Okay. I'm going to have the
3 court reporter mark another exhibit, Exhibit E.

4 (Defendant's Exhibit E was marked for
5 identification.)

6 MS. SMITH: Actually, can we go off the
7 record for a minute?

8 (Discussion off the record.)

9 Q. (BY MS. SMITH) Okay. Ms. Park, I'm going
10 to show you what was just marked as Exhibit E.

11 We had a brief conversation, your counsel
12 and I, off the record, just regarding the second page
13 of Exhibit E.

14 It appears to reflect Plaintiff Danielle
15 Lamar's name. You are not Danielle Lamar; correct?

16 A. I am not --

17 Q. And --

18 A. -- correct.

19 Q. -- we believe that was just mistakenly
20 attached --

21 A. Okay.

22 Q. -- to your verification. Have you seen that
23 verification page before?

24 A. Yes.

25 Q. And do you recall signing it?

1 A. Yes, I do.

2 Q. Okay. Is that your signature?

3 A. It is, yes.

4 Q. Okay. Did you ever obtain a TAM card in
5 Nevada?

6 A. Yes.

7 Q. Do you still have a TAM card?

8 A. I do.

9 Q. Do you know when you first obtained a TAM
10 card?

11 A. This year, um -- or 2016, excuse me, um --
12 goodness. I -- in the summer.

13 Q. Okay.

14 A. I don't --

15 Q. Okay. So not -- not prior to 2016?

16 A. I -- not that I recall, no.

17 Q. Okay. Do you have any other documentation
18 of fees or fines that you may have been assessed or
19 paid at Crazy Horse?

20 A. No.

21 Q. Did you ever give any Crazy Horse receipts
22 to your spouse?

23 A. No.

24 Q. Okay.

25 A. Not that I recall.

1 Q. Okay. So I'm going to refer you to
2 interrogatory answer number 13.

3 It's on page -- the title of the answer is
4 on page 9, but the actual answer itself is on page 10.

5 A. Okay.

6 Q. But the question -- the interrogatory will
7 be on page 9.

8 A. (Witness reading.) Okay. Number 13 --

9 Q. Yes.

10 A. -- yes. Okay.

11 Q. Okay. So is this not in fact your entire
12 response, that you no longer wanted to perform as a
13 dancer at the club?

14 MS. CALVERT: Objection. Confusing.

15 THE WITNESS: (Witness reading.) Correct.
16 It's a general -- generalization of why.

17 Q. (BY MS. SMITH) Okay. Okay. Okay. And
18 then in response to interrogatory number 14, it
19 appears that there are two cases identified.

20 Park versus Dean Martin Drive. Is that
21 Hustler?

22 A. Yes.

23 Q. That's -- okay.

24 A. I believe, yes. Yeah.

25 Q. Okay.

1 A. Uh-huh.

2 Q. And then Sheperd versus SHAC, LLC. Do you
3 know what case that is?

4 A. I don't.

5 Q. Okay. Do you know if Sheperd versus SHAC,
6 LLC is ongoing?

7 A. I -- I don't know.

8 Q. Okay.

9 MS. CALVERT: SHAC is Sapphire. That's
10 their -- that's their DBA. She prob -- she wouldn't
11 know that though.

12 THE WITNESS: Oh, yeah. I have never seen
13 it like that before.

14 Q. (BY MS. SMITH) Okay. So --

15 A. I have --

16 Q. -- you didn't --

17 A. -- no idea.

18 Q. -- have any personal knowledge of that.

19 A. Correct.

20 MS. CALVERT: She would have just known it
21 as the Sapphire case.

22 THE WITNESS: Correct.

23 MS. SMITH: I'm sorry, Counsel, can you just
24 refrain from clarifying your client's answer?

25 MS. CALVERT: Of course.

1 Q. (BY MS. SMITH) So do you know the status of
2 the SHAC case?

3 A. I do not.

4 Q. And I know it says -- you might have
5 answered this, and I'm sorry, but I think it says
6 Shepard.

7 But are you a named plaintiff in that one?

8 A. I'm not sure.

9 Q. Okay. And then I'm just going to refer you
10 to pages 12 and 13, interrogatory number 20.

11 A. Okay.

12 Q. Okay. So this states you recalled that
13 six -- a six-hour minimum; is that correct?

14 A. (Witness reading.) I'm sorry.

15 Q. It's okay.

16 A. Yes, correct.

17 Q. Okay. And that's in line with what you had
18 previously testified?

19 A. Correct, yes.

20 Q. Okay. Now, this states that you have
21 five-minute -- you would have five minutes to exit the
22 floor after a shift ended or you would face a fine of
23 \$75?

24 A. Correct.

25 Q. Okay. Okay. Is that accurate?

1 A. To be off the dance -- yes, that's accurate.

2 Q. Okay. Were you ever fined \$75?

3 A. No.

4 Q. Okay. Did you ever stay on the floor for
5 longer than five minutes?

6 A. Not after checking out.

7 Q. And when you say checking out --

8 A. Or signed out.

9 Q. -- would that be after obtaining the first
10 signature?

11 A. The last signature.

12 Q. Okay. So then you only had five minutes to
13 leave?

14 A. Correct, to leave the dance floor.

15 Q. Okay. And who would enforce that?

16 MS. CALVERT: Objection. Asked and
17 answered. You can respond.

18 THE WITNESS: Any VIP host or manager on the
19 floor would enforce that.

20 MS. SMITH: Okay. All right. I don't have
21 any other questions.

22 MS. CALVERT: What was that? I didn't hear
23 you.

24 MS. SMITH: I don't have any other
25 questions.

1 MS. CALVERT: Oh, okay.

2 MS. SMITH: I don't think. Actually, let me
3 just take a couple minutes and do one last look,
4 but --

5 MS. CALVERT: I think that's --

6 MS. SMITH: -- we'll go off for now.

7 (Discussion off the record.)

8 MS. SMITH: Okay, Ms. Park. We're finished
9 for today. I appreciate you taking the time to come
10 in.

11 THE WITNESS: Thank you very much.

12 MS. SMITH: Okay.

13 MS. CALVERT: Nothing for me.

14 THE COURT REPORTER: Lauren, did you want
15 copies?

16 MS. CALVERT: Yeah, everything just in an
17 e-trans.

18 (The deposition concluded at
19 3:44 p.m.)

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