

IN THE SUPREME COURT OF THE STATE OF NEVADA

ROBERT CLARKE, an individual,
Appellant,

v.

SERVICE EMPLOYEES
INTERNATIONAL UNION, a nonprofit
cooperative corporation; and CLARK
COUNTY PUBLIC EMPLOYEES
ASSOCIATION, A/K/A SEIU 1107, a
non-profit cooperative corporation,

Respondents.

SERVICE EMPLOYEES
INTERNATIONAL UNION, an
unincorporated association; and NEVADA
SERVICE EMPLOYEES UNION A/K/A
CLARK COUNTY PUBLIC
EMPLOYEES ASSOCIATION, SEIU
1107, a non-profit cooperative corporation,

Appellants,

v.

DANA GENTRY, AN INDIVIDUAL; and
ROBERT CLARKE, an individual,

Respondents.

Supreme Court No. 80520
District Case No. A764942
Electronically Filed
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Clerk of Supreme Court

Supreme Court No. 81166
District Case No. A764942

**APPENDIX OF SERVICE EMPLOYEES INTERNATIONAL UNION AND
CLARK COUNTY PUBLIC EMPLOYEES ASSOCIATION A/K/A SEIU
LOCAL 1107, VOLUME 3**

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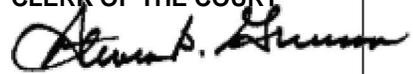
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1 **DECL**
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19 **EIGHTH JUDICIAL DISTRICT COURT**

20 **CLARK COUNTY, NEVADA**

21 DANA GENTRY, an individual; and
22 ROBERT CLARKE, an individual,

23 Plaintiffs,

24 vs.

25 SERVICE EMPLOYEES INTERNATIONAL
26 UNION, a nonprofit cooperative corporation;
27 LUISA BLUE, in her official capacity as
28 Trustee of Local 1107; MARTIN MANTECA,
in his official capacity as Deputy Trustee of
Local 1107; MARY K. HENRY, in her official
capacity as Union President; SHARON
KISLING, individually; CLARK COUNTY
PUBLIC EMPLOYEES ASSOCIATION
UNION aka SEIU 1107, a non-profit
cooperative corporation; DOES 1-20; and ROE
CORPORATIONS 1-20, inclusive,

Defendants.

Case No.: A-17-764942-C

DEPT. XXVI

**DECLARATION OF JONATHAN
COHEN IN SUPPORT OF SERVICE
EMPLOYEES INTERNATIONAL
UNION'S AND MARY KAY HENRY'S
MOTION FOR SUMMARY
JUDGMENT**

1 I, Jonathan Cohen, declare as follows:

2
3 1. I am a member of the law firm Rothner, Segall & Greenstone and am counsel to
4 defendants Service Employees International Union (“SEIU”) and Mary Kay Henry. I make this
5 declaration in support of SEIU’s and Henry’s motion for summary judgment.

6
7 2. Attached hereto as Exhibit A are true and correct copies of excerpts of the
8 certified transcript of the deposition of plaintiff Dana Gentry, taken on May 29, 2019.

9
10 3. Attached hereto as Exhibit B are true and correct copies of exhibits from the
11 certified transcript of the deposition of plaintiff Dana Gentry, taken on May 29, 2019.

12
13 4. Attached hereto as Exhibit C are true and correct copies of excerpts of the
14 certified transcript of the deposition of plaintiff Robert Clarke, taken on May 30, 2019.

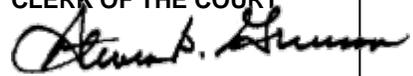
15
16 5. Attached hereto as Exhibit D are true and correct copies of exhibits from the
17 certified transcript of the deposition of plaintiff Robert Clarke, taken on May 30, 2019.

18
19 I declare under penalty of perjury under the laws of the State of Nevada that the
20 foregoing is true and correct.

21 Executed on October 25, 2019, in Pasadena, California.

22
23 By 
24 JONATHAN COHEN

25
26
27
28



1 **APEN**
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12 EIGHTH JUDICIAL DISTRICT COURT

13 CLARK COUNTY, NEVADA

15 DANA GENTRY, an individual; and
16 ROBERT CLARKE, an individual,

17 Plaintiffs,

18 vs.

19 SERVICE EMPLOYEES INTERNATIONAL
UNION, a nonprofit cooperative corporation;
LUISA BLUE, in her official capacity as
20 Trustee of Local 1107; MARTIN MANTECA,
in his official capacity as Deputy Trustee of
21 Local 1107; MARY K. HENRY, in her official
capacity as Union President; SHARON
22 KISLING, individually; CLARK COUNTY
PUBLIC EMPLOYEES ASSOCIATION
23 UNION aka SEIU 1107, a non-profit
cooperative corporation; DOES 1-20; and ROE
24 CORPORATIONS 1-20, inclusive,

25 Defendants.

Case No.: A-17-764942-C

Dept. 26

**APPENDIX IN SUPPORT OF
DECLARATION OF JONATHAN
COHEN IN SUPPORT OF SERVICE
EMPLOYEES INTERNATIONAL
UNION'S AND MARY KAY HENRY'S
MOTION FOR SUMMARY
JUDGMENT**

1 The following documents are submitted in support of Declaration of Jonathan Cohen in
2 Support of Service Employees International Union's and Mary Kay Henry's Motion for
3 Summary Judgment:

		<u>Page(s)</u>
4		
5		
6	Exhibit A	True and correct copies of excerpts of the certified transcript of the 3 – 56
7		deposition of plaintiff Dana Gentry, taken on May 29, 2019.
8	Exhibit B	True and correct copies of exhibits from the certified transcript of 57 – 88
9		the deposition of plaintiff Dana Gentry, taken on May 29, 2019.
10	Exhibit C	True and correct copies of excerpts of the certified transcript of the 89 – 136
11		deposition of plaintiff Robert Clarke, taken on May 30, 2019.
12	Exhibit D	True and correct copies of exhibits from the certified transcript of 137 – 172
13		the deposition of plaintiff Robert Clarke, taken on May 30, 2019.
14		

15
16 DATED: October 25, 2019

ROTHNER, SEGALL & GREENSTONE

CHRISTENSEN JAMES & MARTIN

17
18
19 By /s/ Jonathan Cohen
20 JONATHAN COHEN
21 Attorneys for Service Employees International
22 Union and Mary Kay Henry
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EXHIBIT A

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EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

DANA GENTRY, an individual;)	
and ROBERT CLARKE, an)	
individual,)	
)	
Plaintiffs,)	Case No.
)	A-17-764942-C
vs.)	
)	
SERVICE EMPLOYEES)	
INTERNATIONAL UNION, a)	
nonprofit cooperative)	
corporation; et al.,)	
)	
Defendants.)	
)	

DEPOSITION OF DANA GENTRY

Taken on Wednesday, May 29, 2019

By a Certified Court Reporter

At 10:36 a.m.

At 7440 West Sahara Avenue

Las Vegas, Nevada

Reported by: Wendy Sara Honable, CCR No. 875
Nevada CSR No. 875
California CSR No. 13186
Washington CCR No. 2267
Utah CCR No. 7357039-7801
Job No. 34101

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<<<<<< >>>>>>

1 position is important to me.

2 Q. Okay. Good enough. Let's turn to a
3 couple of documents.

4 (Exhibit No. 1 marked
5 for identification.)

6
7 BY MR. JAMES:

8 Q. This will be attached to the deposition
9 transcript as well as all the exhibits that we use
10 today, and it will be numbered.

11 Do you understand?

12 A. Uh-huh.

13 COURT REPORTER: Is that a "yes"?

14 THE WITNESS: Yes. I'm sorry. Yes.

15 MR. JAMES: Thank you.

16 BY MR. JAMES:

17 Q. Do you recognize this document?

18 A. Yes.

19 Q. Is this the contract you claim to have
20 had with SEIU Local 1107?

21 A. Yes.

22 Q. Is that your signature?

23 A. Yes.

24 Q. Who presented this document to you?

25 A. I believe it was Cheri Mancini or it

1 Q. Did that make you feel good?

2 A. I -- not really. I mean, it was nice
3 that they got -- that the people up in Elko got
4 their contract resolved, but that was what part of
5 my job was.

6 Q. With regard to the hospital, was it a
7 dispute up in Elko?

8 A. Yes.

9 Q. Did you appear on local TV with regard to
10 that dispute up there?

11 A. I don't know if I appeared. I appeared
12 -- I remember I was on a radio interview. I don't
13 know if I appeared on local TV.

14 I believe a station came out to a picket
15 that I was at, and I directed them to members of the
16 union to interview. I don't think I appeared on TV,
17 though, no.

18 Q. What were you doing at the picket?

19 A. I had gone up there for -- I think they
20 were in a bargaining, and I had gone up there with
21 LaNita Troyano and -- no.

22 I went up there by myself and I drove
23 back with LaNita Troyano. But I went up there, and
24 the day we were leaving, there was a picket
25 scheduled. So I went out to the picket, and I think

1 bargaining person who -- she did not work in Las
2 Vegas, but she previously had worked in Las Vegas,
3 and I believe she was from Washington State.

4 And she was down there maybe doing like a
5 contractual thing for SEIU. I'm not sure. I wasn't
6 involved at that level. But she was involved in
7 doing the bargaining, and I just came in and sat in
8 one day. I had never been to a bargaining before,
9 so --

10 Q. So you were the sole director from Local
11 1107 at that event, then, to the best of your
12 recollection?

13 A. You know, I don't know what her position
14 was, so I really can't say that. I'm sorry. I
15 don't -- I'm sure she was in a more senior position
16 than I was because she was doing the bargaining, not
17 me.

18 Q. But you didn't answer to her, correct?

19 A. If she had asked me to do something, yes,
20 I would have answered to her, yes.

21 Q. But she -- I guess my point -- it should
22 be a better question.

23 She wasn't your direct supervisor?

24 A. No. Cherie Mancini was my direct
25 supervisor.

1 held when we got terminated, and they came to my
2 house one day and -- to have me distribute a news
3 release, and I think I sent that out to some
4 media -- they wanted it to go to some national media
5 contacts.

6 But I was not that involved. I didn't --
7 I had no interest in the effort to, you know, retain
8 control of the union or anything like that, so I
9 really can't tell you what the scuttlebutt was.

10 I don't -- I just remember being
11 disappointed that, you know, they were both being
12 punished, essentially. So I didn't -- because I
13 hadn't seen anything that Cherie had done wrong, but
14 I was not involved at the levels perhaps that that
15 -- that those infractions occurred.

16 Q. So you thought Cherie was doing a fine
17 job at the local?

18 A. Seemed to be. Given the environment that
19 she was trying to work in, I think she did the best
20 job that she could. It was a tough environment,
21 because once this all happened, it -- they split
22 into factions.

23 Up until that point, you know, if I would
24 tweet something, social media or put it on Facebook,
25 they would all like it, and it didn't matter whom

1 they were, if they worked for the County or for the
2 private sector. You know, everybody was all
3 enthusiastic and supportive.

4 And then once this happened, they just
5 split off and like -- there were people who shunned
6 me and wouldn't, you know, retweet or like my tweets
7 anymore, people who consistently did up until that
8 point, so --

9 Q. Who was shunning you?

10 A. Oh, gosh. There were a lot of people.
11 There was Clara Thomas. She was a trustee. She was
12 one of them. She was -- she had a -- I remember she
13 had a Twitter account, myclary-something.

14 She was like a -- you know, one of those
15 fanatic followers who just -- as soon as you tweet
16 something, retweets it and likes it and all that
17 stuff, and then as soon as this happened, she
18 wouldn't look at me, talk to me, retweet anything.

19 So, yeah, they just broke into factions,
20 but --

21 Q. What faction would you say Clara belonged
22 to?

23 A. Well, she was on the Sharon side,
24 definitely, yeah. It -- there really was -- there
25 was, you know, pretty much a County split with the

1 BY MR. JAMES:

2 Q. Dana, I'm showing you Exhibit No. 4. Up
3 at the top, it has Dana Gentry,
4 danagentry@gmail.com.

5 Do you recognize that e-mail?

6 A. Yes.

7 Q. Is that your e-mail?

8 A. Yes.

9 Q. And then a little bit farther down, it
10 just says, Forwarded message. I think you forwarded
11 this to your attorney for production to us.

12 Does that sound right?

13 A. Yes.

14 Q. So on April 6th, 2016, you wrote this
15 e-mail to --

16 A. Craig Mueller.

17 Q. Who's that?

18 A. That was the gentleman -- I can remember
19 his name. He was the human resources person. I
20 believe it was Craig.

21 Q. And this was in response to your
22 application for the communications director
23 position --

24 A. Yes.

25 Q. -- correct?

1 purchase your cell phone.

2 This would have been after your
3 termination from Local 1107, correct?

4 A. It looks like this is the day I was
5 terminated.

6 Q. So you were wanting to buy the cell phone
7 from Local 1107?

8 A. Yes.

9 Q. Did you happen to also have a personal
10 number on that cell phone?

11 A. I'm sorry. I don't understand what your
12 question is.

13 Q. Did the cell phone have the capability of
14 having two numbers attached to it?

15 A. It only had my personal number.

16 Q. So then you didn't have a second cell
17 phone?

18 A. No.

19 (Exhibit No. 7 marked
20 for identification.)

21

22 BY MR. JAMES:

23 Q. Showing you what's been marked as Exhibit
24 Number 7, please review it and let me know when
25 you're done, just the first page at this point.

1 A. Okay. (Examining documents.)

2 Q. Did you write this to Mr. Manteca?

3 A. Yes.

4 Q. And you wanted to be removed as the media
5 contact for Local 1107?

6 A. Yes.

7 Q. And if you would look at the second page,
8 this is an article -- there's two articles, so the
9 next three pages, and then the last three pages are
10 two separate articles.

11 I pulled these off the Internet, just
12 interested in your media contact. We have
13 previously mentioned Scott -- Michael Scott
14 Davidson.

15 Do you remember talking about him?

16 A. Yes.

17 Q. Is that the same person that wrote this
18 article?

19 A. Yes.

20 Q. And then the second article of the two,
21 again, Michael Scott Davidson?

22 A. It looks like the same article.

23 Q. If you would look at the first one, it's
24 dated March 1, 2017, and the second one is April
25 26th of 2017.

1 A. Okay. I have two that say March 1st

2 Q. Oh, you're looking at the -- let me see.

3 We're going to fix that. I apologize. There was a
4 duplicate article in there.

5 A. Not a problem.

6 Q. So now if you would take a look at both
7 of those articles.

8 A. Did you want me to read the whole thing?

9 Q. Yes. You don't have to read it out loud,
10 but please read it.

11 A. (Examining documents.)

12 Okay.

13 Q. Do these articles accurately reflect your
14 interaction with Mr. Davidson and the statements you
15 made?

16 A. As best as I can recall, yes.

17 (Exhibit No. 8 marked
18 for identification.)

19

20 BY MR. JAMES:

21 Q. Okay. Showing you what's been marked as
22 Exhibit Number 8, please take a moment to review the
23 document as a whole. You don't have to read each
24 part. Let me know when you're done.

25 A. (Examining documents.)

1 A. No. And I did not know the person -- I
2 didn't remember the person they were referring to.

3 Q. When you entered into this contract, did
4 Local 1107 tell you it was between you, Local 1107,
5 and any other party?

6 A. No.

7 Q. Okay. Are you aware of any other
8 signatures on this contract between -- besides
9 yourself and Ms. Mancini's?

10 A. No.

11 Q. Okay. Did Ms. Mancini tell you that she
12 was signing on behalf of anyone other than Local
13 1107 --

14 A. No.

15 Q. -- when she signed this contract?

16 A. I'm sorry. No.

17 Q. Okay. The employment contract sets out a
18 number of terms; your salary, your benefits, et
19 cetera.

20 Did you negotiate those terms with
21 anybody?

22 A. No, I didn't. They asked me what salary
23 I was hoping to receive, and I said 70,000 or 68,000
24 because that's what I had received in my previous
25 job. And they were like, Okay. Great.

1 Q. And when you say --

2 A. I think I could have asked for more.

3 Q. Lesson learned.

4 When you say "they," who do you mean?

5 A. Cherie and the treasurer, because that's
6 when we were talking about money.

7 Q. Okay. And did you negotiate those terms
8 with anyone other than Ms. Mancini and the treasurer
9 of 1107?

10 A. No, sir.

11 Q. Okay. The contract, at Paragraph 6,
12 refers to "for cause."

13 Did you discuss what that term meant with
14 Ms. Mancini?

15 A. No.

16 Q. Okay. And did you discuss what that term
17 meant with the treasurer?

18 A. No.

19 Q. What about any of the individuals with
20 whom you applied?

21 Did you discuss what that term meant?

22 A. No, I did not.

23 Q. Okay. What about any officers of the
24 union during the time that you were applying for the
25 job?

1 Q. Okay. If I understood your testimony
2 correct, you reported directly to Cherie Mancini; is
3 that right?

4 A. I did.

5 Q. Okay. And she was then the president of
6 1107, right?

7 A. When I first was hired, she was the vice
8 president, and she was elected in the end of June as
9 president. So, technically, no. She was the vice
10 president at the beginning.

11 Q. And when you first started and she was
12 vice president, you reported directly to her?

13 A. I did.

14 Q. And then when she was elected president,
15 you continued to report directly to her?

16 A. Yes. I believe when she was the vice
17 president, she was kind of like the acting president
18 because there was no president.

19 Q. I see. Okay.

20 Other than Cherie Mancini, did you report
21 directly to anybody else at 1107?

22 A. Report directly? Just like if Mary
23 Grillo was in town, I reported to her --

24 Q. Okay.

25 A. -- but that was basically it, just those

1 (Exhibit No. 13 marked
2 for identification.)
3

4 BY MR. COHEN:

5 Q. Ms. Gentry, I'm showing you a document
6 that's been marked as Exhibit 13. It was attached
7 in an earlier pleading in this case as your job
8 description.

9 Does it look familiar to you?

10 A. Yes.

11 Q. Okay. And does it look like the job
12 description that was in effect while you were the
13 communications director?

14 A. As far as I know, yes.

15 Q. Okay. So I would like to just spend some
16 time going over the duties and responsibilities
17 listed here and try to understand better what
18 exactly they are.

19 The -- under Key duties and
20 responsibilities, it says, The communication
21 director serves as a key adviser to Local 1107
22 leadership in a variety of internal and external
23 communications, develops short-term and long-term
24 campaigns strategies, and plans for increasing the
25 size, strength, activism, and savvy of our union

1 membership.

2 Is that an accurate description of your
3 key duties and responsibilities when you were the
4 communications director?

5 A. Yes, I suppose it is.

6 Q. Okay. And when it says "key adviser to
7 Local 1107 leadership," who were the leaders that
8 you were a key adviser to during the time you were
9 the communications director?

10 A. I suppose that was meant to be the
11 officers and the Eboard.

12 Q. Okay. And at the time you were the
13 communications director, Cherie Mancini was
14 president, except for a short time at the beginning,
15 it sounds like?

16 A. Right.

17 Q. Well, there were elections in June of
18 2016, right?

19 A. Yes.

20 Q. And so leadership changed at that time?

21 A. Yes.

22 Q. As of June 2016, am I correct that Sharon
23 Kisling was the vice president?

24 A. Yes --

25 Q. Okay.

1 A. I don't know that there was much strategy
2 involved in that. Another example would be they
3 were having issues with UMC regarding its
4 contract -- I believe an election was put off or
5 something -- and Cherie and Peter and some of the
6 organizers were in a room, and they wrote up a
7 statement to put out.

8 And then they came into my office to get
9 my input on the statement, and I read it and advised
10 them to take out a reference to fiduciary duty, but
11 they didn't listen to me.

12 And that ended up being an issue, so I
13 guess -- I mean, I advise, but nobody -- not a lot
14 of people would listen to what I had to say, so --

15 Q. Okay.

16 A. So my advisory function was, I would say,
17 somewhat limited, but, yeah. I mean, so my strategy
18 in that was that you don't accuse somebody of a
19 legal term, of violating a legal standard kind of.

20 Q. And I guess more generally, the
21 development of short-term and long-term campaign
22 strategies was, for your part, determining the best
23 message to achieve the union's goal; is that fair?

24 A. Right. And, for instance, when the ACA
25 was under attack, you know, I would advise to go out

1 and lobby -- not lobby, but protest outside Heller's
2 office and get our partners to come out and that
3 sort of thing, but nothing revolutionary, I'm sure.

4 Q. Was there anybody at the local at that
5 time also engaged in strategic communications?

6 A. At the local? No, but they had people
7 come in from the International.

8 Q. Okay. Let's just stick with the local
9 for now.

10 A. Okay.

11 Q. Other than you, no one else really worked
12 on strategic communications?

13 A. No, not really.

14 Q. Okay.

15 A. Peter would, you know, sometimes tell me
16 what he thought we should do and -- on
17 communications, on messaging, and things because he
18 was the organizing political director, but,
19 directly, no.

20 Q. So you got input from other directors on
21 messaging?

22 A. Sure.

23 Q. That happened regularly, I'm assuming?

24 A. Sure.

25 Q. But it was your job to kind of marshal

1 all that advice and develop a strategic
2 communications plan?

3 A. Yes.

4 Q. And then advise the union leadership
5 about what your suggested communications plan was?

6 A. Yes.

7 Q. Okay. If we go --

8 A. I was really coordinating a lot of my
9 communications work, though, with Battle Born
10 because they had been doing it before I got there,
11 so Annette Magnus was really more of a resource to
12 me probably than internal people.

13 Q. And that's because no one else was doing
14 communications when you arrived other than Annette?

15 A. Right, right.

16 Q. And why was Annette doing it at that
17 time?

18 A. I believe the union -- the International,
19 maybe -- had contracted with her, with Battle
20 Born --

21 Q. Okay.

22 A. -- to come in and take care of it and --
23 I shouldn't say the International. I'm not sure if
24 it was, but I believe it was.

25 Q. Okay. But for some reason, there was not

1 a communications director, so they had gone outside
2 1107 to --

3 A. Right. They told me the last person they
4 had was good at fliers, but that was about it, and
5 so they were looking to get away from somebody who
6 was just good at fliers and had more of a, you know,
7 political savvy, I suppose. And the fliers was my
8 shortfall. I was not very good at that, so --

9 Q. Under the heading, The communications
10 director is responsible for, and it lists three
11 bullet points, the first bullet point is -- talks
12 about development and implementation of 1107
13 internal and external strategic communication plans,
14 including areas of press, graphic design, mail, and
15 digital communications.

16 So were you -- when a campaign -- when
17 the union initiated a campaign, was it your
18 responsibility kind of to develop the strategic
19 communication component of a campaign?

20 A. Yes.

21 Q. Okay. And you did that by getting input
22 from the various --

23 A. Yes.

24 Q. -- directors at the union?

25 A. Yes.

1 Q. Okay. The second bullet point talks
2 about production of newsletters, website, social
3 media content, press releases, public remarks, and
4 speeches, fliers, brochures, op-eds, talking points,
5 letters to the editor, and other materials.

6 Did you actually prepare those types of
7 communications during the time you were the
8 communications director?

9 A. Yes.

10 Q. Okay. Let's take, for example, public
11 remarks and speeches.

12 Were you actually drafting speeches and
13 public remarks for 1107 representatives?

14 A. Yes --

15 Q. Okay.

16 A. -- but she would often discard them and
17 go off and ad lib.

18 Q. And when you say "she," you mean Cherie?

19 A. The bane of my existence, but, you know,
20 it happens.

21 Q. Yeah.

22 A. Yeah, Cherie.

23 Q. Okay. So I'm assuming you drafted public
24 remarks and speeches for Cherie?

25 A. Yes.

1 Q. And what about other officers?

2 Did you prepare public remarks and
3 speeches for other officers at the union?

4 A. Oh, gosh. Yes, I did.

5 Q. Do you remember which officers?

6 A. For Sharon, for all of them.

7 Q. Okay.

8 A. All of them.

9 Q. And what was the circumstance in which
10 you would prepare public remarks and speeches?

11 Every time they spoke in public, or at a
12 special event?

13 A. When I was asked. I wasn't aware of all
14 of their schedules, so it was on an as-needed basis.

15 Q. Okay. Got it.

16 Did officers stick to the script
17 sometimes?

18 A. I don't know. I was generally not around
19 when a lot of them delivered their remarks, so I
20 don't know.

21 Q. Okay. Okay. What about op-eds?

22 Did you ever prepare any op-eds?

23 A. Yes.

24 Q. Okay. And were they under your name or
25 someone else's name?

1 Q. Okay. The next sentence says, Also
2 responsible for training and preparing members and
3 leadership for press events and/or other public
4 statements.

5 Is that something different than what we
6 have already discussed?

7 A. Not really, no.

8 Q. Okay. The next bullet point is
9 development of proactive earned media and digital
10 campaigns that reenforce, protect, and expand
11 awareness of the union's branding and mission.

12 What does that entail? I guess we could
13 take it piece by piece.

14 What's development of proactive earned
15 media?

16 A. Proactive earned media is just a story
17 placed in the newspaper or a magazine about
18 something that the union has achieved.

19 Q. And how would you go about developing
20 that?

21 A. Well, sometimes it could be campaign
22 based, in which case, you know, you're initiating --
23 you're trying to sell a story, but sometimes there
24 were actual events to base it off of.

25 2015 was a horrible legislative session

1 for unions in Nevada, and so when I came on in 2016,
2 they had -- the union had been challenging several
3 of the laws -- several of the results of the laws
4 and how it affected bargaining unit members.

5 So much of the beginning of my work was
6 interpreting court rulings and sending the court
7 rulings out to members and things like that.

8 Q. Okay. Was part of the development of
9 proactive earned media just reaching out to contacts
10 you had in the news media --

11 A. Yeah.

12 Q. -- and, you know, trying to get them
13 interested in the story that you thought was
14 important?

15 A. Yes. And that's what I was saying. For
16 -- on those issues, you know, when there's a court
17 ruling, it's much easier to sell a story than if
18 it's something nebulous but trying to say, This is a
19 great union, come do a story on it, you know.

20 Q. Right.

21 And as far as you know, you were the only
22 person at 1107 that played that role -- right? --
23 reaching out to the press, trying to get the press
24 engaged in --

25 A. No, I was not.

1 Q. Okay.

2 A. There was sabotage going on in a major
3 way.

4 Q. Okay. Well, let me -- before we get to
5 the sabotage --

6 A. Okay.

7 Q. -- were you the person who was supposed
8 to be --

9 A. Yes, sir.

10 Q. -- solely responsible for cultivating
11 those relationships with the press?

12 A. Yes, sir.

13 Q. Okay. And it was -- you were supposed to
14 be the only person who got the press to cover
15 certain campaigns by 1107?

16 A. Yes, sir.

17 Q. Okay. At some point, that was sabotaged?

18 A. Yes.

19 Q. By whom?

20 A. I don't know, but I can only assume it
21 was Sharon Kisling as well as the people at UMC.

22 Q. And what led you to believe there was
23 sabotage?

24 A. Because people brought me pictures of --
25 or they brought me fliers that had a -- like a

1 yeah. Once the hearing in October was over, things
2 got -- pretty much went back to normal, and we were
3 just trying to do our jobs --

4 Q. Okay.

5 A. -- with as little interference as
6 possible, so --

7 Q. Did you have regular meetings with
8 director-level staff at the local?

9 A. Yes.

10 Q. Okay. And who was at those meetings?

11 A. We had a meeting every Monday morning
12 with the directors and Cherie, and then we would go
13 into the staff meeting.

14 Q. Okay. And tell me, who was present at
15 the director meeting besides you and Cherie?

16 A. Peter.

17 Q. And that's Peter Nguyen?

18 A. Yes.

19 Q. And he was the director of organizing?

20 A. Yes.

21 Q. Okay.

22 A. And once Robert came on, Robert was
23 there.

24 Q. And that's Robert Clarke --

25 A. Yes.

1 Q. -- who was the former director of finance
2 and human resources?

3 A. Yes.

4 Q. Okay.

5 A. And I believe that's it.

6 Q. Okay.

7 A. I want to say sometimes LaNita was in
8 those meetings for some reason.

9 Q. Okay.

10 A. Oh, LaNita and Deb.

11 Q. That's Deb Springer?

12 A. No.

13 Q. Debbie Miller?

14 A. Miller.

15 Q. Okay.

16 A. Sometimes they were in those meetings.

17 Q. Okay. Did they hold director-level
18 positions at the union?

19 A. No. They were like the lead
20 organizers --

21 Q. Okay. So --

22 A. -- but they were not always in there.

23 Q. But you, Mr. Nguyen, Mr. Clarke, and
24 Ms. Mancini were always there?

25 A. Yes.

1 idea what their paperwork said.

2 Q. Okay.

3 A. I'm just saying, in reality, they
4 reported to her.

5 Q. And were you in meetings with them as
6 they reported to Cherie?

7 A. Yes.

8 Q. Okay. This conflict between Cherie and
9 Sharon, did staff take sides in that dispute?

10 A. They did.

11 Q. Okay. And I'm not going to make you go
12 through everybody, but was it pretty clear that
13 staff was on one side or the other of that conflict?

14 A. I don't know how clear it was to the --
15 to anyone outside, but it was clear to people there,
16 yes. It was very unfortunate.

17 Q. Did you feel like everyone had to kind of
18 draw a side in that dispute?

19 A. No, no. I didn't feel that way.

20 Q. Okay.

21 A. I mean, there was no -- you know, no
22 pressure from Cherie, by any means; maybe from
23 Sharon, but not from Cherie.

24 Q. Okay. But it's your impression
25 nonetheless that most staff did take one side or the

1 other?

2 A. Yes.

3 Q. Okay.

4 A. There were really no staff people. I
5 mean, the staff was pretty much on Cherie's side, as
6 far as I could tell.

7 Q. The staff was on Cherie's side?

8 A. Yeah.

9 Q. Okay. At some point, the International
10 determines that, because of the various disciplinary
11 charges, Cherie Mancini and Sharon Kisling have to
12 be removed from office, correct?

13 A. Yes.

14 Q. And that was in April of 2017; is that
15 right?

16 A. Yes, the end of April.

17 Q. Okay. And that was followed by a
18 trusteeship of 1107 by the International, correct?

19 A. I guess so, yeah.

20 Q. Okay. And you were still working at the
21 local at the time trusteeship was imposed, correct?

22 A. Well, what happened was I came to work, I
23 believe, on -- okay. So they had a meeting at
24 night, an executive board meeting, and they had a
25 vote, and I came to work the next morning, and then

1 we were told to go home.

2 So I didn't -- I mean, I was in my office
3 for all of maybe 30 minutes, an hour, and I was told
4 to go home, and then I never went back there --

5 Q. Okay.

6 A. -- except to be terminated --

7 Q. And --

8 A. -- oh, no. I went to that meeting with
9 them, and then I was terminated.

10 Q. At some point, were you asked to complete
11 a questionnaire about your work duties?

12 A. Yes, I was.

13 (Exhibit No. 14 marked
14 for identification.)

15

16 BY MR. COHEN:

17 Q. And, Ms. Gentry, do you recognize Exhibit
18 Number 14?

19 A. Yes.

20 Q. And what is it?

21 A. This is the questionnaire they asked us
22 to fill out.

23 Q. Okay. And does this look like the
24 answers you gave to the questions that were posed to
25 you?

1 A. Yes.

2 Q. Okay. Now, under 1, it says, List your
3 job title and describe your job duties and
4 responsibilities.

5 Am I correct that you then filled -- the
6 rest of that language before Number 2 is what you
7 completed?

8 A. Yes.

9 Q. Okay. And the same for the rest of this
10 questionnaire, correct?

11 A. Yes.

12 Q. Okay. And this was your attempt to
13 accurately set forth what your duties and
14 responsibilities were, correct?

15 A. Yes.

16 Q. Okay. And am I correct that what you're
17 describing here is very similar to the job
18 description that we looked at earlier in terms of
19 your job duties?

20 A. Yes.

21 Q. Okay. So a few lines down, it says,
22 Research and produce investigative reports to
23 augment campaigns and influence members of the
24 public and decision-makers. That's something we
25 haven't talked about before.

1 Q. Is that similar to what you just
2 described, or is that something different?

3 A. No. It's the same thing. For instance,
4 when the -- as I mentioned, the trauma system issue,
5 we did opposition research on HCA and UHS and their
6 efforts to do trauma for profit, basically, so --

7 Q. Got it.

8 A. And I wrote about it or I gave, you know,
9 Cherie information to speak at the health district
10 when she talked about it, so that sort of thing.

11 Q. Right.

12 And she depended on you for that, right?

13 There was no other person on her staff
14 who fulfilled a similar role; is that right?

15 A. No, but she was pretty good at doing it
16 herself, too.

17 Q. Okay.

18 A. She was very astute.

19 Q. Yeah.

20 The next bullet point says, Maintain
21 editorial calendars for social and print media.

22 What's that?

23 A. Just what it says, maintain a calendar
24 with, you know, scheduling, basically, social media
25 campaigns and other communications campaigns.

1 Q. Okay.

2 A. Kind of like a communications plan, but
3 just on a calendar.

4 Q. Got it.

5 A. You know, when to send out the mailer so
6 that it hits before early voting starts and just
7 things like that.

8 Q. Got it.

9 So it's syncing up your messaging with
10 the timing of a particular campaign?

11 A. Yes.

12 Q. Okay. The next point down, it says,
13 Assign/assist staff to produce newsletter material
14 as needed.

15 A. Right.

16 Q. Give me an example of assigning staff to
17 produce newsletter material.

18 A. So we would have a staff meeting and tell
19 them we were coming out with another of our
20 quarterly newsletters or a monthly newsletter or we
21 were hoping to get some input from them on story
22 ideas.

23 Anything going on in the bargaining units
24 that they covered that we could report on; any, you
25 know, employee recognitions, acknowledgements that

1 would make for a good story.

2 And then I sometimes tried to get them to
3 write it, but they were often very resistant, so I
4 ended up writing most of them, but they did procure
5 information for me, so --

6 Q. Got it. Got it.

7 It says, Execute special projects as
8 directed.

9 What's an example of a special project?

10 A. Oh, gosh. There were all kinds of little
11 things that happened. Like, for instance, I
12 mentioned the thing about the insurance, the home
13 care workers not having an insurance policy to fall
14 back on when theirs expired.

15 I think it was just a matter -- whoever
16 was -- there was nobody doing it, and so I was asked
17 and I just filled in because I knew somebody to call
18 to get information, that sort of thing.

19 So it really fell outside of my purview
20 as the communications director, but I didn't want
21 them to not have insurance.

22 Q. It says, a few bullet points down,
23 Cultivate and maintain media relationships.

24 What does that entail?

25 A. Just keeping a good relationship with

1 reporters --

2 Q. Okay.

3 A. -- so that they will, you know --

4 Q. Run stories?

5 A. -- take an interest in your stuff, yeah.

6 Q. Got it. Okay.

7 A. For instance, next week, I'm speaking --
8 I was invited by the AFL-CIO to speak -- there's a
9 machinists' union convention here, and they're
10 having a media panel.

11 And that's what I'm talking about, is how
12 union communications people can facilitate
13 relationships with the media and get their stuff.

14 Q. Got it.

15 The second page describes a number of
16 major campaigns you were involved with, and it lists
17 a number of them. For example, 2017 legislature, it
18 says, Assisting with legislative strategy.

19 Can you just describe, in your own words,
20 what was your role in assisting with that
21 legislative strategy?

22 A. Well, I just know a lot of the lawmakers
23 because I had them on my show so many times --

24 Q. Got it.

25 A. -- so I was able to tell them who to

1 approach for different things. That's all.

2 Q. Got it.

3 A. Nothing important.

4 Q. Okay. And when you say you were able to
5 tell them who to approach, meaning you would tell
6 1107's leadership who were sympathetic legislators
7 or --

8 A. Yes.

9 Q. Okay. And it says the union was part of
10 a coalition working to reign in the cost of
11 pharmaceuticals.

12 Did you participate in coalition meetings
13 on behalf of 1107?

14 A. Yes.

15 Q. Okay. And what was your role at those
16 meetings?

17 A. Well, a lot of the communications people
18 like Bethany Kahn of Culinary 226. We would meet
19 and talk about strategy for the campaign.

20 Q. Got it. Okay.

21 The next one down is mass transit/RTC.
22 I'm helping to assess the mass transit needs of
23 members and the community as part of a local
24 coalition --

25 COURT REPORTER: I need you to slow down

1 We didn't oppose or support it. We just
2 said that if it came, they needed to do good union
3 jobs, was basically what it really said.

4 Q. Got it.

5 And you worked on that release with
6 somebody from each of the --

7 A. With Cherie. It was just a politically
8 sensitive issue because there were lawmakers who
9 were, you know, against the public subsidy, so --

10 Q. Got it.

11 The next group of answers is in response
12 to a question about your work with allied groups,
13 and you list a number of them. I don't want to go
14 through each one.

15 But can you just describe the nature of
16 your responsibility in connection with these allied
17 groups?

18 A. Basically, just to coordinate media
19 campaigns with them so we could support their -- you
20 know, retweet social, get turnout for their events,
21 anything like that that we could do; provide, you
22 know -- if they had an event, we may have a table
23 there with information on SEIU, things like that.

24 Q. And so one of your responsibilities was
25 coordinating with those outside groups --

1 A. Yes.

2 Q. -- on media strategies?

3 A. Yes.

4 Q. Okay. Got it.

5 And then on Number 4, it says, List
6 standing meetings you have or are involved with, and
7 you list a number of different meetings. The first
8 one is the Board of Clark County Commission, UMC,
9 and Water Rec?

10 A. Right.

11 Q. Did you attend those meetings?

12 A. I either attended them or watched them on
13 the Internet, just monitored them to see if there
14 was anything that affected our members.

15 Q. Would you ever speak at them?

16 A. No.

17 Q. And then the next four meetings, it says,
18 TBD.

19 A. Stadium Authority -- oh, to be
20 determined? Because the meetings always changed.
21 There were not any set times. That's all I was
22 saying.

23 Q. Okay. So you would attend those
24 meetings, but they weren't regular?

25 A. Right. The question said like, When are

1 officers of 1107, if you know?

2 Were you communicating with them? So,
3 for example --

4 A. I don't believe so.

5 Q. Okay. All right. So Cherie Mancini was
6 the only former officer you were communicating with
7 during this period between Ms. Mancini's removal and
8 your termination?

9 A. Other officers? I mean, if somebody came
10 in the office and I was there that day, I would have
11 communicated with them --

12 Q. Sure.

13 A. -- but I -- nobody calling me or text
14 messaging me, I don't think, no.

15 Q. Okay. And same for e-mail?

16 A. Yeah. I don't think there was anything.

17 Q. Okay. At some point, you had an
18 interview with the trustees about your job duties,
19 correct?

20 A. Yes.

21 Q. And who was present at that meeting, if
22 you recall?

23 A. That's the meeting I described before
24 where they brought us all in and had us go around
25 the table and introduce ourselves and say what we

1 A. Yes.

2 Q. And that meeting was out of 1107's
3 offices?

4 A. Yes.

5 Q. Okay. And during that meeting, you
6 discussed your job duties?

7 A. Yes.

8 Q. Okay. Between that meeting and the time
9 you were terminated, were there any other meetings
10 with the trustees that you had?

11 A. No.

12 Q. Okay. So describe for me the next
13 meeting you had with Martin.

14 A. They told me to be there, and I went in,
15 and they told me I was terminated.

16 Q. Okay. Who was present at that meeting?

17 A. Steve Ury and Martin.

18 Q. Okay. And who told you that you were
19 terminated?

20 Martin?

21 A. Martin.

22 Q. Okay. And do you recall what he said
23 about why you were terminated?

24 A. No. He just said they were bringing in
25 new people.

1 Q. Okay. So it was just you, Steve, and
2 Martin at the meeting?

3 A. Yes.

4 Q. Okay.

5 A. I believe they had a lady there from -- I
6 didn't know her -- from the International, maybe --

7 Q. Okay.

8 A. -- who came in at one point.

9 Q. Okay. But she wasn't there the whole
10 time?

11 A. I don't think so.

12 Q. Did she say anything?

13 A. I don't think so.

14 Q. Okay.

15 (Exhibit No. 17 marked
16 for identification.)

17

18 BY MR. COHEN:

19 Q! So, Ms. Gentry, do you recognize Exhibit
20 Number 17?

21 A. Yes.

22 Q. And when did you receive this letter?

23 A. That day when they terminated me, I
24 think.

25 Q. Okay. Was it at that meeting?

1 A. I believe so, yes.

2 Q. Okay. And who presented you with this
3 letter?

4 A. Martin.

5 Q. Martin?

6 And this conversation -- I'm sorry if you
7 already told me -- it was at 1107's offices?

8 A. Yes.

9 Q. Okay. And do you recall Martin saying
10 anything that was different from what is described
11 in this letter as the reason for your termination?

12 A. No.

13 Q. Okay. So what he told you verbally was
14 consistent with what the letter says about why the
15 local was terminating you?

16 A. I don't remember what he said. Sorry.

17 Q. Okay. Other than what you just described
18 a moment ago?

19 A. I don't remember what he said except
20 that, you know, We're terminating you.

21 Q. Okay. Was it a long conversation?

22 How long do you think it lasted?

23 A. No. And I think I already knew because
24 they were calling in other people, and I had already
25 heard from other people that they had been

1 Q. Okay.

2 A. I had forgotten about that, but
3 apparently I did, yeah. I believe I was getting
4 media inquiries.

5 Q. So you were getting media inquiries after
6 you were terminated?

7 A. About the trusteeship, because people
8 didn't know I was terminated, I suppose.

9 Q. Got it. Sure, sure.

10 Is that what prompted you to notify
11 Martin to take you off as press contact?

12 A. Yes.

13 Q. Okay. Now, you -- you issued some sort
14 of press release on May 14th, correct?

15 A. I don't remember the day. I'm sorry.

16 Q. Okay. Okay.

17 (Exhibit No. 18 marked
18 for identification.)

19

20 BY MR. COHEN:

21 Q. So, Ms. Gentry, do you recognize the
22 document that was marked as Exhibit 18?

23 A. I do.

24 Q. Okay. And describe for me what that is.

25 A. This is the news release that they had me

1 send out that Peter and Andrea and Robert came to my
2 house to talk about.

3 Q. Okay. So when did that meeting occur, if
4 you can recall?

5 A. I'm sorry. I don't remember.

6 Q. Okay.

7 A. It was probably within a week or two of
8 the terminations.

9 Q. Okay. Well, this is dated May 14th.

10 Am I correct that it was sometime prior
11 to May 14th?

12 A. Yes. It would have been -- this is dated
13 May 15th, so it probably was that day, Sunday, that
14 we had the meeting.

15 Q. So Sunday, May 14th, is the date of the
16 e-mail?

17 A. As in -- yeah, we probably had the
18 meeting at my house that day.

19 Q. Okay. Let's go through just the
20 individuals on this e-mail.

21 It's sent from you at
22 danagentrylv@gmail.com.

23 Is that your personal e-mail address?

24 A. It is.

25 Q. Okay. And then it's sent to --

1 How did it come about?

2 A. I believe somebody called me. I'm not
3 sure if it was -- I feel like it was Andrea who
4 called me and told me they were speaking with an
5 attorney, and they were trying to get the
6 trusteeship overturned or Cherie reinstated or
7 something like that, and they needed help with a
8 news release.

9 So I said, I'm happy to help in any way I
10 can. They wanted me to send it out to national
11 media contacts, not local.

12 So I didn't have any national media
13 contacts. I believe they supplied me with a list of
14 people to send it to.

15 Q. Okay.

16 A. I was just kind of the stenographer.

17 Q. Okay. So she calls you and says she
18 wants your help in this effort, and the next thing
19 that happens is a meeting at your house; is that
20 right?

21 A. Yes.

22 Q. Or are there additional communications
23 prior to a meeting?

24 A. No. I think they just came over.

25 Q. Okay. And when you say "they," it's

1 A. I don't think Andrea had been fired.

2 Q. Okay.

3 A. I think she was still there.

4 Q. What about --

5 A. They only fired the directors.

6 Q. And the directors were you, Robert, and
7 Peter?

8 A. Right.

9 Q. Okay. Was Peter into returning to work?

10 A. Yeah, he wanted to.

11 Q. Okay.

12 A. Yeah. He was pretty much spearheading
13 the effort.

14 Q. He was spearheading the effort?

15 A. Yeah.

16 Q. Okay. And why do you say that?

17 A. Well, I'm just looking at it from what it
18 says. It mentions him a lot. I'm assuming -- I
19 really don't -- I don't think I wrote this.

20 Q. Okay.

21 A. I pretty much sent it out --

22 Q. Okay.

23 A. -- so I don't have much knowledge of, you
24 know, what went into it. I just remember they came
25 to my house, I was nice to them, and I agreed to

1 send it out, but --

2 Q. Okay. You were listed as the contact in
3 the press release, right?

4 A. Yes.

5 Q. And did any members of the press contact
6 you in response to this press release?

7 A. Not that I remember, no.

8 Q. Okay. Did you send it to Michael Scott
9 Davidson?

10 A. I don't think so.

11 Q. Okay. Do you recall to whom you sent it
12 in the local news media?

13 A. I don't, but I could find out, probably.

14 Q. Okay. I would be interested to know, if
15 you could tell us.

16 A. Do you want me to look now?

17 Q. If you don't mind.

18 A. If I sent it to anybody in the local news
19 media? Is that what you said?

20 Q. Yeah.

21 A. I really don't think I did. I think it
22 was all national media.

23 Q. Okay.

24 A. I don't think there was anybody, but I
25 can check. Sometimes older messages won't come up

1 Peter and Andrea, from what I remember.

2 Q. Did you have an understanding about
3 whether Cherie was supporting this effort?

4 A. I think I knew she was, yeah.

5 Q. And why did you know that?

6 A. I think they mentioned, you know, that
7 Adam -- this Adam was doing research for them, and
8 Cherie was part of the group.

9 Q. Okay.

10 A. She was in the e-mail, so probably that's
11 why.

12 Q. Okay. The press release makes a number
13 of representations about the status of 1107 at that
14 time.

15 A. Okay.

16 Q. Did you have personal knowledge about the
17 representations in this press release, or were you
18 just relying on what they were telling you?

19 A. I would have to read it more carefully.
20 I'm sorry.

21 Q. Well, let's go through --

22 A. Do you want to go through each --

23 Q. I'm just curious --

24 A. Tell me what you're interested in and
25 I'll let you know if I have personal knowledge.

1 A. I'm not sure if they came to me with
2 something in hand or if I sat there -- I believe I
3 sat there and wrote down what they told me to say.

4 Q. Okay. Were there any electronic
5 communications about this press release other than
6 this final draft?

7 A. Just what I sent them that said "draft."

8 Q. Okay. So it looks like, at the bottom of
9 this e-mail, it says, Adam Smith wrote, and then
10 there's a -- the message is missing, if you look at
11 Page 2.

12 Was that an e-mail to you?

13 A. No clue. I don't know Adam Smith, so
14 probably not.

15 Q. Okay.

16 A. I mean, I met him when he came to work
17 there, but I -- he never e-mailed me.

18 Q. Right.

19 Is it possible that there are other
20 e-mails on your personal e-mail account connected to
21 this same press release and this meeting?

22 A. Unlikely, but I will check.

23 Q. Okay.

24 MR. MCAVOYAMAYA: And, again, we will be
25 objecting to producing any communications after the

1 termination as well, so --

2 MR. COHEN: Okay. Let's keep going
3 through this, and then we will get to that point.

4 BY MR. COHEN:

5 Q. So the next paragraph down says, with
6 regard to the Southern Nevada Health District, the
7 trustees placed in control by the International
8 union have refused to move forward with charges of
9 bad faith and regressive bargaining and intimidation
10 of union bargaining team members.

11 Do you have any personal knowledge of
12 that?

13 A. No.

14 Q. That's just something else they told you
15 to put in the press release?

16 A. Yep.

17 Q. Okay. It was obviously critical of the
18 trustees, correct?

19 A. Yes.

20 Q. And you would agree that this entire
21 press release is very critical of the trusteeship
22 and the trustees, correct?

23 A. I think that was the point.

24 Q. Okay. Was there anything described here
25 in this press release that you had personal

1 A. Yes.

2 Q. And that meeting was out of 1107's
3 offices?

4 A. Yes.

5 Q. Okay. And during that meeting, you
6 discussed your job duties?

7 A. Yes.

8 Q. Okay. Between that meeting and the time
9 you were terminated, were there any other meetings
10 with the trustees that you had?

11 A. No.

12 Q. Okay. So describe for me the next
13 meeting you had with Martin.

14 A. They told me to be there, and I went in,
15 and they told me I was terminated.

16 Q. Okay. Who was present at that meeting?

17 A. Steve Ury and Martin.

18 Q. Okay. And who told you that you were
19 terminated?

20 Martin?

21 A. Martin.

22 Q. Okay. And do you recall what he said
23 about why you were terminated?

24 A. No. He just said they were bringing in
25 new people.

1 A. I believe so, yes.

2 Q. Okay. And who presented you with this
3 letter?

4 A. Martin.

5 Q. Martin?

6 And this conversation -- I'm sorry if you
7 already told me -- it was at 1107's offices?

8 A. Yes.

9 Q. Okay. And do you recall Martin saying
10 anything that was different from what is described
11 in this letter as the reason for your termination?

12 A. No.

13 Q. Okay. So what he told you verbally was
14 consistent with what the letter says about why the
15 local was terminating you?

16 A. I don't remember what he said. Sorry.

17 Q. Okay. Other than what you just described
18 a moment ago?

19 A. I don't remember what he said except
20 that, you know, We're terminating you.

21 Q. Okay. Was it a long conversation?
22 How long do you think it lasted?

23 A. No. And I think I already knew because
24 they were calling in other people, and I had already
25 heard from other people that they had been

REPORTER'S CERTIFICATE

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STATE OF NEVADA)
) ss
COUNTY OF CLARK)

I, Wendy Sara Honable, CCR No. 875, a duly certified court reporter licensed in and for the State of Nevada, do hereby certify:

That I reported the taking of the deposition of the witness, DANA GENTRY, at the time and place aforesaid;

That prior to being examined, the witness was by me duly sworn to testify to the truth, the whole truth, and nothing but the truth;

That I thereafter transcribed my shorthand notes into typewriting and that the typewritten transcript of said deposition is a complete, true and accurate record of testimony provided by the witness at said time to the best of my ability.

I further certify (1) that I am not a relative, employee or independent contractor of counsel of any of the parties; nor a relative, employee or independent contractor of the parties involved in said action; nor a person financially interested in the action; nor do I have any other relationship with any of the parties or with counsel of any of the parties involved in the action that may reasonably cause my impartiality to be questioned; and (2) that transcript review pursuant to NRCP 30(e) was requested.

IN WITNESS WHEREOF, I have hereunto set my hand in the County of Clark, State of Nevada, this 12th day of June 2019.

Wendy Sara Honable
Wendy Sara Honable, CCR No. 875

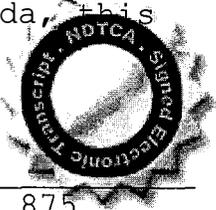


EXHIBIT B



April 18, 2016

Dana Gentry

I am pleased, on behalf of the membership of the Service Employees International Union, Local 1107, to extend to you this offer of employment with our organization, in the capacity of Communications Director. This offer of employment shall commence on April 18, 2016.

After a Six (6) month probation period, you will meet with the President of the Local to evaluate your performance and position.

The wage and benefit package for this position includes the following:

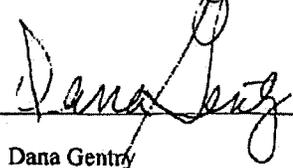
1. Effective April 18, 2016, you will commence employment with Local 1107, the annual salary for your position will be \$70,000.
2. Effective June 1, 2016, you will be entitled to a fully employer funded health care including medical, dental, vision and prescription benefits.
3. Pension benefit where 20% of your gross salary is contributed to the Affiliates Officers and Employees Pension Fund administered by the Service Employee International Union Benefits Office. Such contributions shall be in addition to the other wage and economic benefits provided herein.
4. Commencing on your first full pay period, you will accrue eight (8) hours of leave for each bi-weekly pay period, which may be used for sick leave, vacation, or personal leave.
5. An auto allowance of \$500.00 will be paid once a month, usually the first pay period of that month.
6. Termination of this employment agreement may be initiated by the SEIU Nevada President for cause and is appealable to the local's Executive Board, which shall conduct a full and fair hearing before reaching a final determination regarding your employment status.

On behalf of the Officers and staff of Local 1107, I would like to express how very excited we are that you have decided to join us.

Sincerely, 

Cherie Mancini
President
SEIU Nevada Local 1107

I accept this offer and will begin work on April 18, 2016.

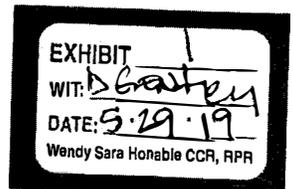
Signed:  Date: 4/18/16
Dana Gentry

SERVICE EMPLOYEES
INTERNATIONAL UNION
LOCAL 1107, CTW, CLC

3785 E. Sunset Drive
Las Vegas, NV 89120

PHONE 702-386-8849
FAX 702-386-4883

www.seiunv.org



Local - 003



Michael Mcavoyamaya <mmcavoyamayalaw@gmail.com>

Fwd: Communications Director Application

1 message

Dana Gentry <danagentrylv@gmail.com>

Sat, Sep 1, 2018 at 12:46 PM

To: Michael Mcavoyamaya <mmcavoyamayalaw@gmail.com>



----- Forwarded message -----

From: **Dana Gentry** <danagentrylv@gmail.com>

Date: Wed, Apr 6, 2016 at 9:44 PM

Subject: Communications Director Application

To: <cmueller@seiunv.org>

As a native Las Vegan with extensive ties to a variety of sectors, excellent communication skills and a deep commitment to the community, I am uniquely qualified for the position of SEIU Communications Director.

For 14 years I served as executive producer of Nevada's premier political news interview program and as anchor and executive producer of a weekly business program.

I enjoy a wealth of media connections, excellent judgment, in-depth knowledge of government process and a reputation for high ethical standards.

Thank you for your consideration and I look forward to an interview.

Cordially,

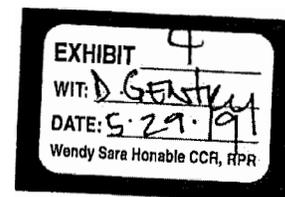
Dana Gentry

<http://lasvegassun.com/blogs/final-take/2012/jul/09/federal-judge-takes-senior-status-amid-controversy/>

2 attachments

Dana Gentry Resume.docx
14K

IMG_20160312_0001.pdf
1542K



Gentry-Clarke000057

Blog

Federal judge takes senior status amid controversy

By **Dana Gentry**

Monday, July 9, 2012 | 12:30 p.m.

On the day U.S. District Judge Kent Dawson attained senior status, meaning he can reduce his caseload to one-quarter of what it was, get paid his regular salary and retain his staff, government prosecutors told Dawson they are not yet ready to opine on whether he is conflicted in the case of Steve Davidovici, the nightclub owner who pled guilty to a tax evasion scheme and was sentenced by Dawson to house arrest and probation, over objections from the government.



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Dawson blamed the media for the controversy surrounding the sentence, and claimed two reporters invited him to commit an ethical violation by asking him questions about the case. I can't speak for the other reporter, but I can say I asked the following of the judge: Did he disclose that his son worked at clubs connected to Davidovici and was he aware his brother, attorney John E. Dawson, is the resident agent for Spendthrift Holdings, a company related to the Chateau Nightclub where Davidovici was a partner and Gallery Nightclub, where he was a consultant?

The judge also accused the media of misquoting him, claiming he did not say at an earlier hearing that he didn't know where his son worked. He said the record showed he said that he did not know the circumstances and specifics of his son's employment. I've ordered a transcript of the hearing.

Dawson said he wondered why the government attorneys needed extra time to investigate any potential conflict. The attorneys said they were unable to elaborate. The judge then invited them to make their case under seal. They declined.

Prosecutors restated their objections to Davidovici's sentence and to the judge's refusal to give them more time to investigate his potential conflict and suggested the judge officially enter the sentence so that the government may file its appeal. Davidovici's attorney David Chesnoff declined to comment on the record.

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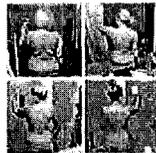
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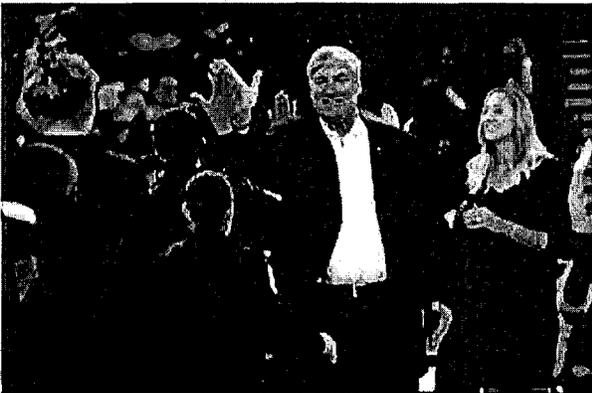
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5/28/2019

Federal judge takes senior status amid controversy - Las Vegas Sun Newspaper

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Michael Mcavoyamaya <mmcavoyamaya@gmail.com>

Fwd: Website

1 message

Dana Gentry <danagentrylv@gmail.com>

Sat, Sep 1, 2018 at 1:57 PM

To: Michael Mcavoyamaya <mmcavoyamaya@gmail.com>

----- Forwarded message -----

From: **Dana Gentry** <danagentrylv@gmail.com>

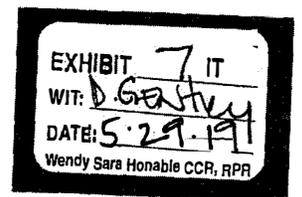
Date: Sun, May 7, 2017 at 4:22 PM

Subject: Website

To: Martin Manteca <martin.manteca@seiu.org>, <janet.veum@seiu.org>, <luisa.blue@seiu.org>, Steven Ury <steven.ury@seiu.org>

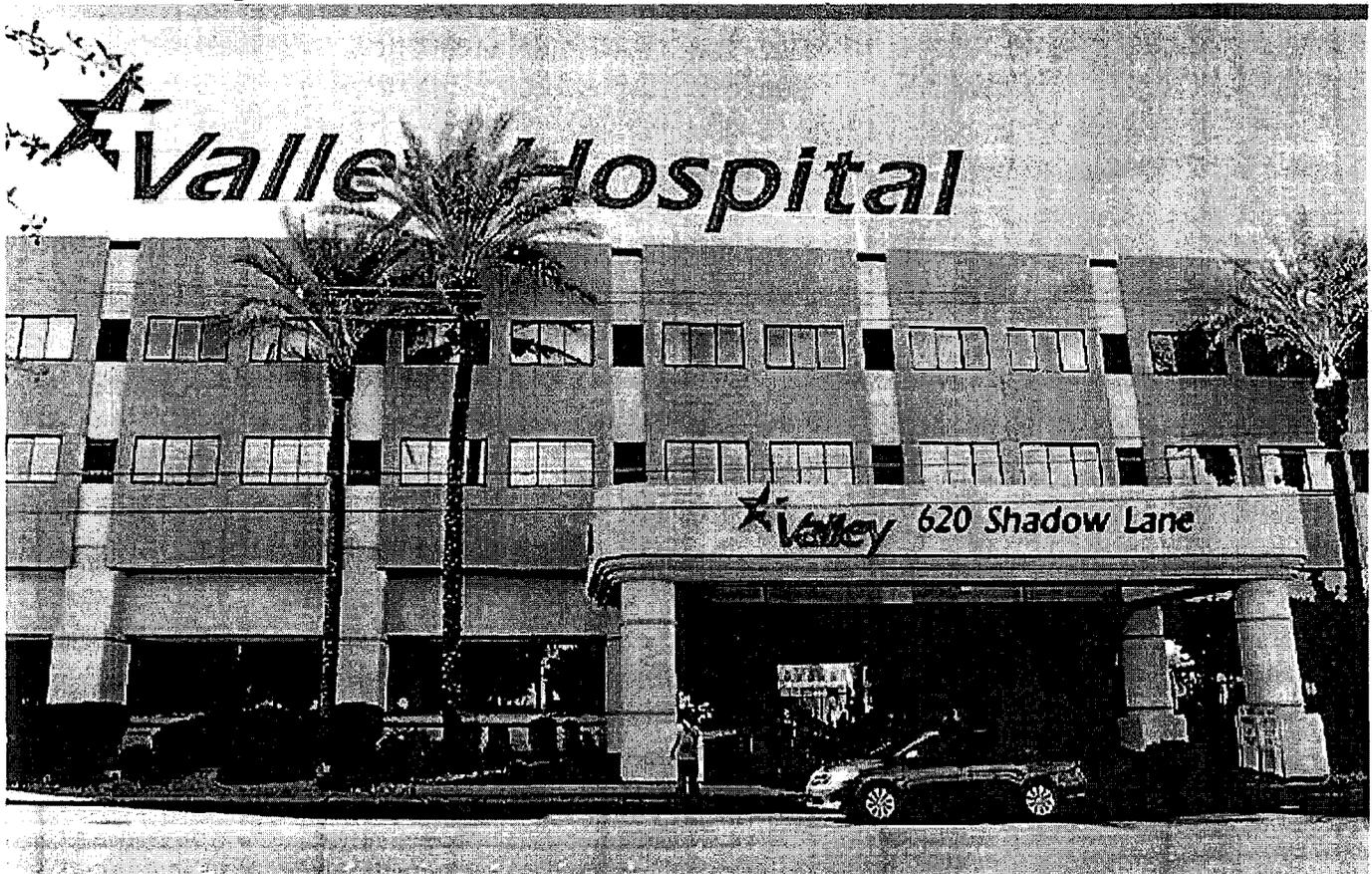
Please remove me as the media contact. Thank you.

Sent from my iPhone



Gentry-Clarke000071

Valley Hospital Medical Center cut ties with union, union official says



Valley Hospital is seen on Friday, Oct. 17, 2014. (David Becker/Las Vegas Review-Journal)

By MICHAEL SCOTT DAVIDSON LAS VEGAS REVIEW-JOURNAL



March 1, 2017 - 5:12 pm

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Valley Hospital Medical Center has severed ties with Service Employees International Union Local 1107, the union reports.

The move, which came Feb. 17, cut off contract negotiations, SEIU spokeswoman Dana Gentry said. The hospital no longer recognizes the SEIU as representing a bargaining unit of more than 500 registered nurses.

Union President Cherie Mancini believes Desert Springs Hospital Medical Center is trying to follow suit, according to an internal union memo

obtained by the Las Vegas Review-Journal.

“We have received numerous reports that Desert (Springs Hospital) employees have been forced or otherwise coerced to sign (decertification) cards or had their information used electronically without consent for the purpose of removing your union,” Mancini said in the memo.

A spokeswoman for both hospitals declined to comment.

But the SEIU provided the Review-Journal with a letter from Valley Hospital Medical Center, dated Feb. 17 and apparently signed by hospital CEO Elaine Glaser, that states the recognition was withdrawn because the union lost support from a majority of bargaining unit members.

“Specifically, we have verified that over 50 percent of the current bargaining unit RNs (registered nurses) signed cards indicating they did ‘not wish to be represented’ by the union ‘for the purpose of collective bargaining with my Employer,’” the letter states.

Union spokeswoman Dana Gentry said the SEIU represents 535 registered nurses at Valley Hospital Medical Center. At Desert Springs Hospital, the union represents 439 registered nurses and 91 health care technicians.

Contracts for nurses in bargaining units at both hospitals expired last May, Gentry said.

Both for-profit hospitals are owned by King of Prussia, Pennsylvania-based Universal Health Services Inc. and are part of The Valley Health System, a network of six local acute-care hospitals. The SEIU organized at both hospitals in 2000, Gentry said.

Last week, the union filed a complaint against Valley Hospital Medical Center with the U.S. National Labor Relations Board. The complaint alleges

the hospital withdrew its recognition without producing proper evidence to back its claims about lost support.

UNLV law professor Ruben Garcia, a labor law expert, said the union's complaint could reverse the hospital's decision.

"If they've been found to improperly withdraw recognition, they'll be forced to go back to the table and bargain in good faith," he said.

MORE LABOR COMPLAINTS

Since September, the SEIU has submitted at least five complaints against Valley Hospital Medical Center to the NLRB.

The union claims the hospital stopped collecting union dues from employee paychecks seven months ago, restricted union representatives' access to the hospital and removed postings from union bulletin boards at the hospital.

Another complaint accuses hospital management of implying that supporting the union would impede employees' career advancement.

The NLRB has not held a hearing for most of the complaints yet, Gentry said. All cases remain open, according to the board's website.

Contact Michael Scott Davidson at sdavidson@reviewjournal.com or 702-477-3861. Follow [@davidsonlvrj](https://twitter.com/davidsonlvrj) on Twitter.

Top 2 elected officials removed from Nevada service union



Service Employees International Union Local 1107 members and supporters, wearing purple shirts, wait for public comment to take place during the County Commission meeting at Clark County Government Center, Tuesday, June 16, 2015, in Las Vegas. Las Vegas Review-Journal

By Michael Scott Davidson Las Vegas Review-Journal



April 26, 2017 - 2:30 pm

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Service Employees International Union removed its Nevada chapter's two highest-ranking elected officials Wednesday, according to an internal memo obtained by the Review-Journal.

President Cherie Mancini and executive vice president Sharon Kisling are barred from holding office for one year and are suspended from union membership for six months, the memo states.

SEIU Local 1107 spokeswoman Dana Gentry confirmed via email that Mancini and Kisling have been ousted. Both were elected in June, but

Mancini had served as the local's president since Martin Bassick resigned in October 2015.

Although Mancini and Kisling campaigned together, the two clashed repeatedly during their time at the helm of SEIU 1107.

The infighting prompted in a private two-day hearing in October, during which members of SEIU International's executive board and hearing officer Carol Nieters heard complaints about how the local union was being run.

"The overall pattern that emerges from the evidence is one of a President willing, and even inclined, to sideline her fellow officers so that she can function autocratically or, at best, with a small cadre of staff whose hiring was never even approved by the (SEIU 1107 Executive) Board," Nieters wrote in a report of her findings. "Her conduct is not to be condoned."

Mancini declined an interview through Gentry. Kisling could not immediately be reached for comment.

SEIU Local 1107 represents about 18,000 workers in Nevada. About half are government employees and half are private sector health care workers.

SEIU International executive vice president Neal Bisno and deputy chief of staff Deedee Fitzpatrick attended a SEIU 1107 executive board meeting Wednesday night "in order to discuss how the Local can move forward in the way that best serves its members," the memo states.

SEIU International president Mary Kay Henry appointed SEIU International staff members Kathy Eddy and Steve Ury to assist Local 1107 leaders "with carrying out the Local's priorities and commitments," the memo states.

Months of infighting

Nieters recommended Mancini's removal because of actions the president took in July against members of SEIU 1107's contract bargaining team at

University Medical Center.

Mancini unilaterally canceled an imminent contract ratification vote with the hospital and announced she was opening an internal investigation into the bargaining team members for violating their fiduciary duty “without any explanation or evident justification,” Nieters wrote.

“Her accusation impugned the integrity of the bargaining committee members and their loyalty to their members, and put the Local and its entire membership in a terrible light with the employer and the community,” Nieters wrote.

Mancini was also faulted for hiring union staff and approving service contracts without the permission of the other members of SEIU 1107’s executive board, and for meeting with administrators from different companies without inviting vice presidents on the union’s corresponding bargaining units.

Nieters recommended removing Kisling from office because of her attempt in August to usurp Mancini’s authority.

While Mancini was on vacation, Kisling tried to fire SEIU 1107 Director of Organizing and Representation Peter Nguyen. During a confrontation at the union hall, Nieters wrote, Kisling “accosted, hounded, berated and threatened” Nguyen, resulting in another executive board member putting her body between Kisling and Nguyen in fear that the altercation would become physical.

“In sum, Sister Kisling’s actions in attempting to terminate Peter Nguyen amounted to an abuse of her position and a blatant attempt to aggrandize to herself the authority of Sister Mancini long enough to rid herself of an individual staff member who had long been a thorn in her side,” the hearing officer wrote. “Such conduct cannot be countenanced.”

Contact Michael Scott Davidson at sdavidson@reviewjournal.com or 702-477-3861. Follow @davidsonlvrij on Twitter.

[View this document on Scribd](#)

SEIU Nevada Local 1107 Job Description

Position: Communications Director

Key Duties and Responsibilities:

The Communications Director serves as a key advisor to Local 1107 leadership in a variety of internal and external communications, develops short-term and long-term campaign strategies and plans for increasing the size, strength, activism and savvy of our union membership.

The Communications Director is responsible for:

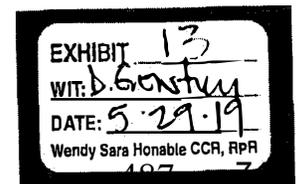
- Development and implementation of Local 1107 internal and external strategic communications plans, including the areas of press, graphic design, mail and digital communications.
- Production of newsletters, website, social media content, press releases, public remarks and speeches, fliers, brochures, op-eds, talking points, letters to the editor and other materials. Also responsible for training and preparing members and leadership for press events and/or other public statements.
- Development of proactive earned media and digital campaigns that reinforce, protect and expand awareness of the union's branding and mission.

An ideal applicant will possess these qualifications:

- **Strategic Vision:** A successful record of implementing innovative internal and external communications strategies and initiatives that have contributed to significant advancement of an organization's purpose and goals.
- **Creativity:** A record of effectiveness utilizing novel and creative approaches that engage members, allies, and adversaries. Solid grasp of how to use emerging technology to connect across a wide demographic spectrum.
- **Organizing/Results Orientated:** Has shown results in building power and accomplishing goals through messaging, branding and related communications efforts aligned with the needs and aspirations of constituents and strategic allies.
- **Effective Communicator:** Strong interpersonal skills, evidenced in group and individual settings. A significant team contributor with political savvy. Exceptional writing and editing skills.
- **Self-awareness:** A mature sense of one's strengths; a willingness to accept feedback non-defensively and operate flexibly in a complex and sometimes ambiguous work environment.
- **Values Match:** Demonstrated commitment to principles of organizational equity and inclusion. A core belief in the importance of empowering people through active engagement and collective action at work and in the community. Comfortable with taking direction from elected member leaders.

Additional Knowledge/Experience:

- 3-7 years of experience in political campaigns and/or progressive advocacy communications, branding and media relations.
- Proven record of success directing rapid response and crisis communications efforts.
- Extensive on the record media experience.
- Familiarity with social media strategy and digital best practices.
- Project management experience, the ability to handle multiple projects simultaneously, and meet established deadlines.
- Experience in designing and implementing strategic communications plans for organizing and political campaigns, as well as collective bargaining.
- Excellent writing, editing and interpersonal communication skills.
- Familiarity with local and national media.
- Proficiency with both PC and Mac-based word-processing tools, web site software such as WordPress



and graphic design experience is a plus.

Education:

Minimum of a Bachelor's Degree from an accredited four-year college or university and a record of lifelong learning including recent professional development work. Relevant experience will be considered in lieu of education.

Degree in media, communications, marketing, writing, or related area a plus.

All interested applicants should send a resume, cover letter, and 2 writing samples to Chris Mueller at cmueller@seiunv.org. Subject line the e-mail "Communications Director Application." No phone calls please.

Salary commensurate with experience.

WORK ASSIGNMENT QUESTIONNAIRE

Please answer the following questions about your work. Feel free to attach additional sheets if there is not enough room for your answer.

1. List your job title and describe your job duties and responsibilities.

Communications Director

Develop and execute communications plan in keeping with budget and designed to support members and advance goals of SEIU Nevada

Maintain internal and external communications including email, texts, flyers, news releases, social media, event notification, newsletters (electronic and print) and website

Produce literature and other content as needed .

Create messaging, plans, strategy and media for priority campaigns of both Local and IU

Research and produce investigative reports to augment campaigns and influence members, public and decision makers

Produce opposition research as needed

Maintain editorial calendars for social and print media

Assign/assist staff to produce newsletter material as needed

Monitor employer activity via public meetings, public filings, news reports, etc.

Execute special projects as directed

Assist in planning and execution of member/volunteer events

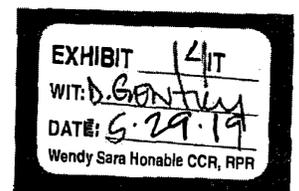
Cultivate and maintain media relationships

Collaborate with advocacy organizations within a variety of coalitions

2. Who do you report to?

I previously reported to the president.

- 3.



Gentry-Clarke000028

Describe the major campaigns you are involved in, including the campaign, the issue, the goal(s), departments involved, key member activists in the campaign and actions already taken.

2017 Legislature

Assisting with legislative strategy, including fix for 2015 anti-union measure, which abolished Evergreen clauses from public employee union contracts. State Senate Minority Leader Michael Roberson is spearheading the effort to preserve the 2015 legislation. He is also hoping to eliminate banked time from public employee contracts.

We are also working to put teeth in the state's hospital staffing law and raise the minimum wage.

The union is also part of a coalition working to rein in the cost of pharmaceuticals. Bethany Khan of Culinary 226 is the contact. bkhan@culinaryunion226.org She has asked that we provide a member who is affected by the high cost of diabetes drugs for a hearing this Wednesday, May 3 at Noon.

A full list of our priority bills can be found [on the website](#). Lobbyist - Marlene@thelockardgroup.net

Mass Transit/RTC

I am helping to assess the mass transit needs of members and the community as part of a local coalition supporting the \$23 billion vision of the Regional Transportation Commission, which is one of our public employers. The project offers many job opportunities for members. Bill Marion is a private consultant who represents the RTC. 702-283-0813. **Have meeting scheduled with Bill and mass transit expert on May 23 at 11:30.**

Las Vegas Raiders Stadium

We joined five unions in a news release expressing the need for good, union jobs should the project proceed.

I have been attending stadium board meetings and monitoring progress. **Next meeting is May 11 at 1 p.m., County Govt Center.**

We have submitted a vendor interest form for custodial and/or food service positions.

President Mancini had discussions with the Laborers' Union. This is a politically sensitive

topic because of the Culinary Union's opposition to the project and reluctance to take part. We stand to gain however it is at the risk of damaging our relationship with Culinary and State Senator Yvanna Cancela, formerly the Comms/Political Director of Local 226.

Contacts: Tommy White <tommylocal872@aol.com>, Tom Morley <tom@local872.com>

Bargaining

I am assisting the Addus organizers find affordable insurance to propose in negotiations. Consulted with SEIU IU Health and Welfare and advised to find policy locally. Have identified one at half the premium currently paid by Addus employees. Current employee contribution is about three time the amount that would make the premium affordable under ACA guidelines, or no more than 9.6 percent of gross income. Don't know how Addus is getting away without massive fines. May be able to use as a bargaining chip.

Presenting to bargaining team at May 12 negotiations.

Insurance broker is George Maalouf of Brown & Brown Insurance (702)457-2268

UHS Opposition Research/FBI Investigation

I have been compiling instances of questionable activity by UHS hospitals in Las Vegas. Some has already been reported on our website and elsewhere. Please let me know if you want links.

Additionally, the FBI has asked to interview our sources and is expected to visit Las Vegas this month.

Wage Theft

I have lined up an attorney who is willing to file a lawsuit on behalf of home care workers who have been victims of wage theft, which is rampant among local employers. We have published stories and our workers have testified before lawmakers.

One worker, Detra Page, is expected to leave her agency this month so that she may identify other workers and file a lawsuit.

Bradley Schragger of Wolf Rifkin Shapiro is the attorney. BSchragger@wrslawyers.com

4. Do you work with allied groups (non-profits, advocacy organizations, other unions or the AFL, etc.)? If so, please list any such groups, your individual contacts there and in what context you work with them.

I collaborate with the following people to generate interest and participation in actions,

events, trainings, etc.

Battle Born Progress, Annette Magnus annette@battlebornprogress.org

For Our Future, Alicia Briancon alicia@forourfuturefund.org

Progressive Leadership Alliance of Nevada, Laura Martin lmartin@planaction.org

Planned Parenthood, Raquel Cruz-Juarez raquel.cruz-juarez@ppfa.org

Children's Advocacy Alliance, Denise Tanata denise.tanata@caanv.org

Organizing For America, Jose Rivera jrivera@ofa.us

Alliance for Health Care Security, Andres Ramirez, andres@ramirezgroup.com

America Votes, Kenia Morales kmorales@amencavotes.org

Nevadans Together for Medicaid, Jessica Lamb, jessica.lamb@caanv.org

For Our Future, Artie Blanco, artie@forourfuturefund.org

4. List all standing meetings you have/are involved with, including labor-management meetings, committee meetings and worksite or facility meetings. Include the regular date/time/location, regular agenda items and regular participants from the unions and, if applicable, the employer.

Board of Clark County Commission, UMC, Water Rec (First and third Tuesdays at 9 a.m.)

Stadium Authority (TBD)

SNHD Board of Health (TBD)

LVCVA (TBD)

RTC (TBD) Second Thursday at 8:45 a.m.

SEIU Executive Board (Final Wednesday)

Communications Committee (Second Saturday 11 a.m. ?)

5. List all current contract negotiations (including mediation/fact-finding) underway at your worksites. Include name of worksite, names of bargaining committee members, schedule of bargaining dates that have been set and the name and contact information for the employer's representative at the table.

6. Identify any pending grievances, arbitrations, ULPs, litigation or any other claims filed on behalf of members. Include worksite, grievant(s)/plaintiff, steward involved, status of the case, timeline for next stage. Also, identify the location of any files related to these cases/claims, electronic or hard copy.

7. Identify the lists and the location of the lists or databases that you use or keep in the course of representing members within your assigned area, including lists of members, stewards, leaders, etc.

Blue State Digital email database

Revolution Messaging Text database

SEIUNV.ORG

8. Identify all the forms that you use in the course of your representation work including forms for updates/tracking membership, COPE, member activity, etc.

9. Describe the training done or orientation done for new and current stewards in your area. Who conducts the training? How often are the trainings available to stewards in your area?

10. List any Local 1107 property that you use/have access to and can take outside of the office such as a cell phone, laptop, office key or key card, etc.

Cell Phone 702-401-2032

Key to SEIU office door

Key to my office door

11. Do you do any work in Reno or Elko? If so, please describe the work and how often you visit that office.

12. Do you work with any consultants or vendors, including law firms, lobbyists, auditors, political consultants, etc.? List the name of the company/firm, any individuals you work with and in what context you work with them.

Lobbyist Marlene Lockard - Legislative and local government strategy

Anthony Patti, PDQ Printing - Design/Print of paper goods, T-shirts, union bling, etc.



SEIU Nevada Local 1107
2250 S. Rancho Drive, Suite 165
Las Vegas, NV 89102
Phone (702) 386-8849

May 4, 2017

HAND DELIVERED

To: Dana Gentry

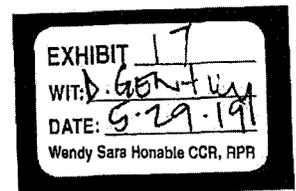
Dear Ms. Gentry:

As you know, Local 1107 has been placed under trusteeship by the Service Employees International Union. The Trustees of Local 1107 have been charged with the restoration of democratic procedures of Local 1107. In connection with formulating a program and implementing policies that will achieve this goal, going forward the Trustees will fill management and other positions at the Local with individuals they are confident can and will carry out the Local's new program and policies. In the interim, the Trustees will largely be managing the Local themselves with input from member leaders.

For these reasons, the Trustees have decided to terminate your employment with Local 1107, effective immediately. You are hereby directed to immediately return any property of the Local that you have in your possession, including but not limited to credit cards, phones, keys or key cards, vehicles, computers, files (both electronic and hard copy) and any other property in your possession.

Sincerely,

Martin Manteca
Deputy Trustee, SEIU Local 1107

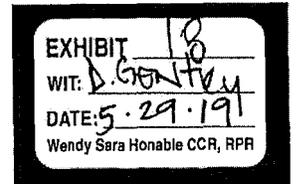


Gentry-Clarke000008

Subject: Re: Press Release
From: Dana Gentry (danagentrylv@gmail.com)
To: inignem@outlook.com;
Cc: peterjkd@gmail.com; benita24@gmail.com; hellcat66@att.net;
Date: Sunday, May 14, 2017 5:44 PM

For Immediate Release May 15, 2017

Contact: Dana Gentry 702-870-8119



Local Union Members Attempt to Regain Control from International

Members of SEIU Nevada Local 1107 are going to court Tuesday to regain control of their Union, which has been seized and placed in trusteeship by SEIU International, at great peril to members.

The removal of Director of Organizing and Representation, Peter Nguyen, from his role as chief negotiator at numerous bargaining tables causes irreparable and permanent harm to union

members and the bargaining process.

Specifically, in the case of Clark County negotiations, Mr. Nguyen's removal and the cancellation of bargaining sessions has made it nearly impossible for an on-time contract to be finalized.

With regard to the Southern Nevada Health District, the trustees placed in control by the International Union have refused to move forward with charges of bad faith and regressive bargaining and intimidation of Union bargaining team members.

Negotiations with Las Vegas Convention Visitors Authority, which had yielded key tentative agreements, have been derailed, as have Mr. Nguyen's preparations for talks with Addus Home Care.

Communication between International Trustees and SEIU Local members has been nearly non-existent. Furthermore, the communication that has trickled to members has been incomplete and misleading.

For example, the International falsely informed news media that all staff would be retained. Three staff members have been terminated and the International Trustees rescinded an offer to a candidate who relocated to Las Vegas.

Additionally, with just weeks left in the 2017 legislative session, the International Trustees are ignoring priorities, including a seminal measure to hold hospitals accountable for patient safety. The International has also abandoned efforts to undue the effects of anti-worker legislation passed in 2015 (SB241), which potentially delays raises and benefits for hard working public employees.

RG016645

The International Trustees have cancelled training sessions, bargaining sessions and halted member representation, including grievance processes, also at great peril to members.

The trusteeship also highlights how international unions have fallen out of touch with the bread and butter needs of members on a local level at a time when the working class desperately needs legitimate representation.

The International Trustee's actions in removing a duly elected officer are repugnant and holy unjustified. In fact, President Mancini acted in response to members' requests and demands to protect their interests. The

International's own investigative findings confirm that President Mancini's actions were in the best interest of members. President Mancini currently has an appeal pending with SEIU International's executive board.

Absent any financial impropriety, the International president assumed original jurisdiction without exhausting the local union process first and manufactured an emergency to falsely justify the need for an illegitimate take-over of

the local.

The trusteeship comes on the heels of SEIU international's announcement of drastic budget cuts amid reduced membership and political challenges.

On Sun, May 14, 2017 at 5:20 PM, Adam Smith <inignem@outlook.com> wrote:

|

EXHIBIT C

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EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

DANA GENTRY, an individual;)	
and ROBERT CLARKE, an)	
individual,)	
)	
Plaintiffs,)	Case No.
)	A-17-764942-C
vs.)	
)	
SERVICE EMPLOYEES)	
INTERNATIONAL UNION, a)	
nonprofit cooperative)	
corporation; et al.,)	
)	
Defendants.)	
)	

DEPOSITION OF ROBERT L. F. CLARKE

Taken on Thursday, May 30, 2019

By a Certified Court Reporter

At 9:33 a.m.

At 7440 West Sahara Avenue

Las Vegas, Nevada

Reported by: Wendy Sara Honable, CCR No. 875
 Nevada CSR No. 875
 California CSR No. 13186
 Washington CCR No. 2267
 Utah CCR No. 7357039-7801
 Job No. 34103

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Rothner, Segall & Greenstone
510 South Marengo Avenue
Pasadena, California 91101-3115
626.796.7555
626.577.0124 Fax
jcohen@rsglabor.com

<<<<<< >>>>>>

1 BY MR. COHEN:

2 Q. Before we go any further, Mr. Clarke,
3 what is it that you're looking at right now?

4 A. This is my cover letter and my
5 application.

6 Q. Oh, I'm sorry. I meant on your iPad.
7 Is there something that you're referring
8 to?

9 A. Oh, my iPad? I was just taking notes.

10 Q. Okay. All right. So you've been shown
11 what's been marked as Exhibit 23.

12 And if I understood, this is your
13 application; is that right?

14 A. Yeah. It's my cover letter.

15 Q. Okay. And am I correct that when you
16 submitted this cover letter to 1107, you sent it to
17 the attention of Cherie Mancini?

18 A. That's correct.

19 Q. Okay. And did you send it to anyone else
20 other than Ms. Mancini?

21 A. No. I believe I sent it just to Cherie
22 Mancini.

23 Q. Okay. How did you first find out about
24 the position?

25 A. I believe it was on union jobs.

1 (Exhibit No. 25 marked
2 for identification.)

3

4 BY MR. COHEN:

5 Q. Mr. Clarke, I'm showing you what's been
6 marked as Exhibit 25.

7 Do you recognize that document?

8 A. Yes, I do.

9 Q. And what is it?

10 A. It's my offer of employment.

11 Q. Okay. And is that your signature at the
12 bottom?

13 A. Yes.

14 Q. And is -- am I correct that you signed
15 that on August 23rd, 2016?

16 A. Yes.

17 Q. Okay. Did you negotiate this contract
18 with anyone at 1107?

19 A. Did I negotiate it? No. This was a --
20 I'm just trying to think. I think the only thing I
21 might have requested was a relocation reimbursement
22 on this.

23 Q. And with whom did you make that request?

24 A. With Cherie.

25 Q. With Cherie?

1 Did you negotiate with anyone else other
2 than Cherie --

3 A. No.

4 Q. -- with respect to this contract?

5 A. No.

6 MR. JAMES: And I'm sorry. He shook his
7 head "no"?

8 THE WITNESS: No, I didn't negotiate with
9 anyone, but I do -- I just recall you asked about
10 where I was in July, and I was just trying to think
11 because I was going back to that date, you know, and
12 I think I said I was in California, but I could have
13 been in Virginia at that time. I would have to
14 double-check. We're going back quite a bit, so --

15 BY MR. COHEN:

16 Q. Okay. So who sent this contract to you?

17 A. I believe it was e-mailed by Ken.

18 Q. And who's Ken?

19 A. He was the accountant there.

20 Q. Is that Ken Ubani?

21 A. Yes, Ubani.

22 Q. Okay. And you said you negotiated at
23 least one term with Ms. Mancini, and you didn't
24 negotiate with anyone else other than her; is that
25 right?

1 A. Correct.

2 Q. Okay. If you look at Paragraph 7 of the
3 contract, the second line refers to "for cause," and
4 I'm wondering if Ms. Mancini ever discussed with you
5 what the meaning of "for cause" was in your
6 contract.

7 A. I really don't recall that. I'll say
8 this: I know I wanted to have some protection if I
9 were to take this position coming back, you know,
10 moving to a different state.

11 So I know, you know, at some point, I
12 wanted to make sure that I couldn't just get
13 terminated for no reason, so --

14 Q. Okay. Did you have a conversation with
15 Cherie Mancini about the meaning of "for cause" at
16 any time?

17 A. I don't think I had a conversation
18 regarding the definition of "for cause." My -- I
19 had an understanding of "for cause," so I wouldn't
20 have had a conversation with her --

21 Q. Okay.

22 A. -- necessarily.

23 Q. What about anyone else other than Cherie
24 Mancini at Local 1107 around that time?

25 Did you have a conversation with

1 A. No, I did not.

2 Q. Okay. Did you apply for any promotions
3 at the time you worked there?

4 A. There were no promotions to apply for.
5 There was no other position.

6 Q. Okay. You were at the top of the --

7 A. I was at the top of --

8 COURT REPORTER: Try to wait until he
9 finishes.

10 THE WITNESS: Oh, I'm sorry. Go ahead.

11 COURT REPORTER: Sorry.

12 BY MR. COHEN:

13 Q. Go ahead.

14 You were -- I was going to ask, were you
15 at the top of the hierarchy in your department?

16 A. Yes.

17 Q. Okay. And your salary was paid by Local
18 1107, correct?

19 A. Yes.

20 Q. And that was true for the whole time that
21 you worked there?

22 A. Yes.

23 Q. Okay. Other than your employment
24 contract, was there any other agreement between you
25 and Local 1107 regarding your salary?

1 chapter.

2 Q. Okay. Other than somebody from the local
3 chapter, did you negotiate this contract with anyone
4 else?

5 A. No.

6 Q. Okay. So you only negotiated with Cherie
7 Mancini, right?

8 A. That's correct.

9 Q. She was the president of Local 1107,
10 right?

11 A. Correct.

12 Q. Did she tell you that she was negotiating
13 on behalf of any other entity other than Local 1107?

14 A. No, she did not.

15 Q. Okay. And did you tell her that you
16 understood you were entering into this contract with
17 an entity other than Local 1107?

18 A. No, I did not.

19 Q. Okay. All right. Now, the contract
20 provides employer-funded healthcare, and you
21 received that employer-paid healthcare, correct?

22 A. Correct.

23 Q. And if I understand the contract
24 correctly, it was employer funded. The employee
25 didn't have to make contributions; is that right?

1 Q. Okay. And the amount of your auto
2 reimbursement was \$500 monthly; is that right?

3 A. Well, I think it was an allowance of
4 \$500.

5 Q. Okay. And that was regardless of how
6 many miles you drove in any given month?

7 A. That's correct.

8 Q. Okay.

9 A. I believe that was -- yes.

10 Q. Okay. And then you received a one-time
11 relocation reimbursement of \$2500; is that right?

12 A. That's correct.

13 Q. Okay. Other than your salary, the auto
14 allowance, and your relocation reimbursement, did
15 you receive any other monetary compensation from
16 Local 1107?

17 A. No.

18 Q. Okay. And are you aware of any other
19 benefits other than the ones that we have discussed?

20 A. No.

21 Q. All right. So, Mr. Clarke, I want to
22 spend some time talking about your job
23 responsibilities.

24 Your title at Local 1107 was director of
25 finance and human resources; is that right?

1 A. Correct.

2 Q. Okay. And who was your direct
3 supervisor?

4 A. Cherie Mancini.

5 Q. Okay. And was she the president during
6 the time you were employed there?

7 A. Yes, I guess, up until the point the
8 trustees took over.

9 Q. Okay. Was Ms. Mancini the person who
10 directed or assigned you work on a regular basis?

11 A. Yes.

12 Q. Okay. Did you ever have performance
13 reviews?

14 A. No, not in that sense. I mean, we met
15 weekly to discuss what was going on, but -- yeah.

16 Q. Okay. And "we" -- who was it who met
17 regularly?

18 A. Cherie Mancini and myself.

19 Q. Okay. And anyone else at those meetings?

20 A. No. I mean, we had other meetings where
21 there were other people there --

22 Q. Okay.

23 A. -- but if you were -- you know, depending
24 on what was being discussed.

25 Q. Okay.

1 A. Yeah.

2 Q. So you and Cherie would meet weekly just
3 to discuss the matters of importance to you as the
4 director of finance and human resources?

5 A. Right.

6 Q. Okay. And prior to the time that you
7 were terminated, were you ever disciplined or
8 counselled by anybody?

9 A. No.

10 Q. When you wanted to take time off, who
11 would you inform?

12 A. Cherie.

13 Q. Cherie?

14 Anybody else?

15 A. No.

16 Q. Okay. Same for when you called in sick?
17 You would inform Cherie?

18 A. Correct.

19 Q. Okay. Did you supervise anybody?

20 A. Yes.

21 Q. And who did you supervise?

22 A. Ken -- I forgot some of the names. I
23 know Ricky; Jennifer, I believe.

24 Q. Okay.

25 A. Basically, people in the administrative

1 group as it was.

2 Q. Okay. So let's take them one at a time.

3 Ken is Ken Ubani, correct?

4 A. Correct.

5 Q. And do you recall what his job title was
6 when you were his supervisor?

7 A. I believe it was accountant.

8 Q. Accountant? Okay.

9 And you said Ricky. That's Ricky Jones,
10 right?

11 A. I forgot the last name.

12 Q. And that's a woman, right?

13 A. No. That's a guy.

14 Q. Oh, that's a guy? I'm sorry.

15 What was Ricky's job title, if you
16 recall?

17 A. I don't recall the title.

18 Q. Do you recall what his responsibilities
19 were?

20 A. No, not in -- no.

21 Q. Do you recall generally what he did?

22 A. Yeah. He -- I mean, he worked on member
23 services. He worked on, you know, revenue
24 statements; several things.

25 Q. Okay. And you mentioned a Jennifer.

1 Do you recall Jennifer's last name?

2 A. No, I do not. If you show me the list of
3 names, I'll tell you, but I don't recall off the top
4 of my head.

5 Q. Okay. Do you recall generally what her
6 duties were?

7 A. Administrative.

8 Q. Okay. So each of those three people
9 reported directly to you?

10 A. There were, I think, two others as well.
11 I just don't recall the names.

12 Q. Okay. Do you recall what the
13 responsibilities were of those two other
14 individuals?

15 A. Yeah. One of them dealt with revenue,
16 generating reports for the revenues coming in.

17 Q. And the other?

18 A. Administrative. And also one person was
19 the receptionist --

20 Q. Okay.

21 A. -- and there were administrative, you
22 know, duties --

23 Q. Okay.

24 A. -- except for Ken.

25 Q. Okay. Did that supervision include

1 recommendation?

2 A. Yes.

3 Q. Okay.

4 (Exhibit No. 26 marked
5 for identification.)

6

7 BY MR. COHEN:

8 Q. Before we turn to Exhibit 26, Mr. Clarke,
9 I have just a few follow-up questions.

10 When the staff under your supervision
11 wanted to take time off, would they ask you?

12 A. Yes, they would.

13 Q. Okay. And if they were reporting late to
14 work, would they report to you?

15 Would they ask you for permission?

16 A. Yes.

17 Q. And same thing if they had to leave work
18 early?

19 Would they notify you?

20 A. Yes.

21 Q. Okay.

22 A. For the ones that were reporting to me,
23 correct.

24 Q. Right. Sure.

25 So I'm showing you what's been marked as

1 Exhibit 26, and I'll represent to you that this was
2 attached to a pleading earlier in the case. It has
3 a copy of your job description.

4 Does this look familiar to you?

5 A. It looks familiar.

6 Q. Okay. Does it look like the job
7 description that was in effect during the time you
8 were the director of finance and human resources?

9 A. That's possible. I don't recall the
10 exact -- everything that's on here, but --

11 Q. Okay.

12 A. -- it looks like it would be correct.

13 Q. Okay. I want to spend some time going
14 through this.

15 First of all, Mr. Clarke, I've reviewed
16 your job description, and it's my assumption that
17 you had access to all of the union's financial
18 records; is that correct?

19 A. That would be correct.

20 Q. Okay. And the job description says, The
21 director of finance and human resources is a senior-
22 level position and reports directly to the president
23 of the local.

24 Do you agree with that?

25 A. Where does it say "senior"?

1 don't -- you know, I think it depends on what you
2 mean by "reporting," but --

3 Q. So you had a -- you had some
4 responsibility to the treasurer as well, is what
5 you're saying?

6 A. Yeah, but I also had a responsibility to
7 -- I think, from what I was told on day one, if any
8 member requested financial documents, to provide
9 that.

10 Q. Okay. Under Paragraph 5, it says to,
11 List all standing meetings, and one of the meetings
12 that you appear to have listed is a weekly managers'
13 meeting.

14 What was that?

15 A. It was a managers' meeting that took
16 place weekly --

17 Q. Okay.

18 A. -- with the managers and Cherie.

19 Q. Okay. And who were the other managers
20 that attended that meeting besides yourself?

21 A. Myself, Peter Nguyen, Dana, I think
22 LaNita sometimes, and Debbie.

23 Q. And that's Dana Gentry?

24 A. Yeah.

25 Q. And LaNita Troyano?

1 marked as Exhibit 28.

2 Do you recognize this document?

3 A. Yeah, I think I recognize this.

4 Q. And do you recall receiving this sometime
5 on or about April 28th, 2017?

6 A. I mean, I don't recall the exact date,
7 but I think I do recognize this, so, yeah, that
8 sounds correct.

9 Q. Okay. At some point after you learned
10 that the trusteeship had been imposed over Local
11 1107, you had an interview with the trustees about
12 your job duties, right?

13 A. Correct.

14 Q. Do you recall how soon after you received
15 this e-mail you had that meeting?

16 A. It would have been relatively soon.

17 Q. Okay.

18 A. I mean, I think they have the exact day.

19 Q. All right. Now, according to this e-mail
20 that we're looking at, Exhibit 28, staff was
21 directed to stay home that day with pay unless
22 otherwise instructed. That's the third paragraph
23 from the bottom.

24 Do you see that?

25 A. Yes. Yes, I do.

1 Q. And were you instructed to stay home as
2 well?

3 A. I probably -- yes. I mean, I'm sure I
4 was instructed at the same time. I followed
5 whatever the instructions were.

6 Q. Did anyone tell you that, despite this
7 e-mail, you should still report to work?

8 A. I don't recall if somebody did.

9 Q. Okay. Tell me what you recall about that
10 interview you had regarding your job duties after
11 the trusteeship was imposed.

12 A. Well, it seemed more like an interview
13 where they were asking me to swear loyalty to the
14 trustees.

15 Q. And why is that -- well --

16 A. Because they asked me to swear loyalty to
17 the trustees. That's why I saw that.

18 Q. Okay. Let's come back to that. Let's
19 start first with where the meeting was held.

20 A. The meeting was held at the local's
21 offices.

22 Q. And who was present at that meeting?

23 A. Several people. So Martin was present.

24 Q. That's Martin Manteca?

25 A. Yeah. And I forget the -- I forget the

1 attorney, the other attorney that they had with them
2 from International. I forgot his name, but he was
3 there.

4 There was also another young lady. She
5 was an attorney as well. She was there. I'm trying
6 to recall if Luisa was there. There were several
7 people in the room.

8 Q. Okay. Other than yourself, was there any
9 staff of Local 1107 present in the meeting that
10 you're describing?

11 A. No.

12 Q. So it was just you, Martin, two attorneys
13 from the International union, and someone else?

14 A. Correct.

15 Q. Okay.

16 A. I don't remember the number of people, so
17 when you say "someone else," I don't know -- I can't
18 remember the number of people in the meeting. The
19 ones I've mentioned to you are the ones I definitely
20 recall were there, but I don't remember the exact
21 number of people that were there.

22 Q. Understood.

23 And what was discussed during that
24 meeting?

25 A. I believe that there were some questions

1 that came up regarding, you know, functions/duties,
2 but there was also the question of, you know,
3 whether or not I would swear loyalty to the
4 trustees.

5 Q. And who asked you that in particular?

6 A. I believe it was Martin.

7 Q. Okay. And what did you say when Martin
8 asked you that?

9 A. I don't recall exactly what I said on
10 that.

11 Q. It seems like something you would
12 remember given how unusual that circumstance is.

13 A. Yeah, but you're asking me to say exactly
14 so you can recall what I said, right? I can give
15 you a rough idea because I would probably say the
16 same thing today. I'm not --

17 Q. I would love a rough idea. I'm not
18 asking you to recall verbatim what you said because
19 I understand there's no way you could recall
20 verbatim.

21 A. Yeah, yeah. So I -- I mean, I would have
22 said something along the lines of, you know, I was
23 hired to, you know, work on behalf of the union, so,
24 you know, I have no issues or no problems, you know,
25 serving, you know, the union and whoever's in charge

1 of running the union. It would have been something
2 along those lines.

3 Q. So you expressed to them that you had no
4 issues working under the trustee; is that what you
5 expressed?

6 A. Yeah. It would have been something
7 along -- you know, along those -- along those lines.

8 Q. At that time when you were interviewed,
9 did you have any issues working under the trustees?

10 A. Well, at that time, everything was just
11 taking place, right? So I think, you know, part of
12 my job as a manager is also to make sure that this
13 is all correct, right?

14 You know, you don't just blindly accept
15 certain things. You want to make sure that is
16 everything right, you know.

17 Obviously, the staff, I think, at the
18 time didn't know -- were thinking -- we were all
19 wondering, What's going on? This all happened like
20 that, right?

21 So, you know, at the time, you know, I
22 don't have a problem with any legitimate structure
23 that's in place to run the union.

24 So I think my answer from that time would
25 have been along those lines, and it would be

1 accurate. If something is legitimate, I would have
2 no issue with it. Again, I didn't have -- I didn't
3 draw any conclusions at that time as to specifically
4 what was going on.

5 Q. How many days after receiving Exhibit 28
6 did that meeting happen, if you can recall?

7 A. I don't recall. You would have to tell
8 me the day of the meeting. They have it
9 documented --

10 Q. Okay.

11 A. -- but I don't have it documented.

12 Q. Is it your recollection that it was
13 within a matter of days after the trusteeship was
14 imposed?

15 A. I believe it was within days.

16 Q. Okay. And you said you would have had no
17 problem working for a legitimate structure.

18 Did you, at the time they interviewed
19 you, have questions about whether the trusteeship
20 was, in fact, legitimate?

21 A. I had questions.

22 Q. Okay. And what were those questions
23 based on?

24 A. The questions were just based on whether
25 or not I -- it was, you know, did I think this was

1 legitimate? What was going on? I didn't know what
2 -- I didn't know what was going on. So, you know, I
3 had no time to do any real independent investigation
4 as to why this occurred and what was taking place.

5 When the trusteeship went into place, I
6 was actually traveling for business for the union,
7 so --

8 Q. If you believed that the trusteeship was
9 illegitimately imposed, would you have felt
10 comfortable working under the trustees?

11 A. No, I would not.

12 Q. Okay. And at the time that the
13 trusteeship was imposed, you did not know whether
14 the trusteeship was legitimate, right?

15 A. Correct.

16 Q. You still had questions about it?

17 A. Yes, I did.

18 Q. You were still exploring whether that
19 trusteeship was legitimate?

20 A. Correct.

21 Q. And at the time you were interviewed by
22 the trustees about your responsibilities, you were
23 still wondering whether the trusteeship was
24 legitimate, right?

25 A. Correct.

1 scheduling.

2 Q. Okay. And was she one of the people you
3 were communicating with over text message about the
4 trusteeship?

5 A. She was one of those people.

6 Q. Okay. And were you communicating with
7 Peter Nguyen as well?

8 A. He was one of those people.

9 Q. What about Robert -- sorry.

10 A. Yeah, I was there.

11 Q. Forgive me.

12 What about Dana Gentry?

13 A. She was, I think, on those messages at
14 some point, but -- yeah.

15 Q. You were talking over text, or you were
16 communicating over text --

17 A. Right.

18 Q. -- with the people you just identified
19 about the trusteeship, correct?

20 A. Correct.

21 Q. And is it fair to say that those people
22 were each, including yourself, critical of the
23 trusteeship?

24 A. Yeah, that would be fair to say.

25 Q. And would it be fair to say that you were

1 each critical of the representatives of the
2 International union who were administering the
3 trusteeship?

4 A. I don't think that necessarily would be
5 fair initially. I think what happened is that we
6 looked up the names of the people, and Manteca had a
7 reputation of being a bully --

8 Q. Okay.

9 A. -- and being a tyrant, and so when you --
10 you know, you had -- and I think there's one
11 document we discovered that had 55 signatures of his
12 -- of the people who worked for him who signed a
13 document basically stating that this guy was a bully
14 and a tyrant.

15 So when you read those types of things,
16 it makes you question. And then just meeting him on
17 the first day, yeah, he wasn't -- he wasn't a
18 pleasant person, so that was obvious.

19 Q. Okay. So let's start with the document
20 that you found that described him as a bully, I
21 think was your word.

22 When did you find that document?

23 A. I don't know the exact day or date, but
24 once we knew who the trustees were, I mean,
25 different people Googled the names of who these

1 people were, so --

2 Q. Right.

3 And did someone share that document with
4 you, or did you find it yourself?

5 A. I might have found it myself and other
6 people, I think, found things themselves.
7 Everybody, I think, Googled.

8 Q. And do you recall seeing that document
9 before first meeting Mr. Manteca?

10 A. No, I did not see that document before I
11 first met with him.

12 Q. Okay. But you just described meeting
13 Mr. Manteca and agreeing that your first impression
14 with him was a negative one; is that fair?

15 A. That would be fair.

16 Q. Okay. What happened that led you to draw
17 that conclusion about him?

18 A. His demeanor, his talk, you know, the way
19 he carried himself, the way he interacted with the
20 people, his refusal to let anybody go back to their
21 office to get any personal things that they had back
22 there that didn't belong to the union, that -- that
23 type of action.

24 Q. So that first meeting with him, did it
25 add to the concerns you had about the legitimacy of

1 the trusteeship?

2 A. Yes.

3 Q. Did it add to your concerns about being
4 able to work for the trustees given that he was
5 going to be the deputy trustee?

6 A. I mean, you know, after meeting him, you
7 know, I realized that could be an issue.

8 Q. Well, you don't want to work for a
9 tyrant, do you?

10 A. No, of course not.

11 MR. MCAVOYAMAYA: Objection.
12 Argumentative.

13 THE WITNESS: Of course not.

14 BY MR. COHEN:

15 Q. It's pretty obvious you wouldn't want to
16 work for someone who you felt was a tyrant, right?

17 A. Yeah. I mean, I'm not -- nobody would
18 want to work for somebody like that, right?

19 Q. I agree. I agree.

20 Between the time that you formed that
21 impression of Mr. Manteca and the time you were
22 terminated, did your opinion of him change?

23 A. No.

24 Q. Okay.

25 ////

1 conversation and all because they disagreed with the
2 trusteeship.

3 Q. Okay.

4 A. I figured, even though it was on her
5 personal phone, I could see Martin demanding to see
6 your phone, even though it wasn't the union phone,
7 and if you didn't show him, I could see him probably
8 terminating you.

9 Q. Given your impression of Martin Manteca
10 at that time, did you really want to work under him?

11 A. I wouldn't want to work with -- like what
12 we discussed, that, I mean, I wouldn't want to work
13 under somebody who seems to be like a tyrant or a
14 bully, so --

15 Q. Right.

16 And you never changed your opinion about
17 him between the time you met him and the time you
18 were terminated, right?

19 A. No.

20 Q. Okay. At 10:10 a.m., Andrea texts you,
21 Steve has to attend an investigatory meeting today.

22 I understand you're not Ms. Bond and you
23 don't know who she had in mind, but was this -- was
24 your impression that this is the same Steve you
25 referred to earlier, that staff person?

1 (Exhibit No. 30 marked
2 for identification.)

3
4 BY MR. COHEN:

5 Q. Mr. Clarke, do you recognize this text
6 thread?

7 A. Yeah. It looks like text messages

8 Q. Okay. And would these be text messages
9 that you retrieved from your personal phone?

10 A. Yes.

11 Q. Okay. And am I correct that this
12 reflects a text thread between April 26th, 2017, and
13 April 30th, 2017?

14 A. Correct.

15 Q. Okay. Am I correct that the participants
16 on the text thread were yourself, Ms. Bond, and
17 Peter Nguyen?

18 A. Correct.

19 Q. Okay. And, again, the messages to the
20 right in dark text are the ones that you sent,
21 correct?

22 A. Correct.

23 Q. And the ones on the left are the ones
24 that you received from either Mr. Nguyen or
25 Ms. Bond?

1 THE WITNESS: Okay. I'm just trying to
2 make sure that that -- my response was related
3 directly to that last comment.

4 BY MR. COHEN:

5 Q. Yeah. Fair enough. Take your time.

6 A. Because I also have a comment that says,
7 Yes, right?

8 Q. Yeah.

9 A. So that somehow went hand in hand with
10 the suspensions of both Cherie and Sharon? I think
11 the "yes" is in response to that.

12 Q. Okay.

13 A. And the, if true, self-inflicted, I think
14 is kind of referring to perhaps that -- the local
15 Eboard.

16 Q. The local Eboard having voted?

17 A. Having voted the trusteeship themselves,
18 yes.

19 Q. Okay. So if it's self-inflicted, it
20 would be because the Eboard themselves voted to have
21 a trusteeship?

22 A. I think -- yes. In my understanding,
23 some of the board members didn't realize that they
24 wouldn't be board members, so --

25 Q. Okay. If you would turn to Page 5, at

1 8:37 p.m., you say, You would have to be a fucking
2 idiot to vote to trustee.

3 A. Yeah.

4 Q. Why did you say that?

5 A. Because, like I said, some of them didn't
6 realize that they would not be -- they wouldn't hold
7 their positions. I think -- I think -- oh, what's
8 her name? The treasurer didn't realize that she
9 would no longer be treasurer, so --

10 Q. What about those people who did realize
11 what the impact of a trusteeship meant?

12 Did you believe that they were also
13 fucking idiots?

14 MR. MCAVOYAMAYA: Objection. Calls for
15 speculation.

16 Go ahead and answer.

17 THE WITNESS: You know, I think I said
18 what I said, which is, essentially, I think if you
19 voted to trustee, it was stupid.

20 BY MR. COHEN:

21 Q. And why did you think that?

22 A. Because, one, I didn't think that they
23 were really -- you know, from what I could tell at
24 that time, I didn't believe there were any grounds
25 for the trusteeship.

1 Q. And these would -- when you're -- the
2 people you're referring to are --

3 A. Those five board members and Cherie just
4 did not get along.

5 Q. Okay. And there was, would you agree,
6 quite a bit of conflict between them?

7 A. Uh-huh.

8 Q. Is that a "yes"?

9 A. Yes. Sorry. Yes.

10 Q. Okay. So on the bottom of Page 10 --
11 sorry. On the bottom of Page 9, Mr. Nguyen says,
12 Robert, I am reading the International report, and
13 it basically seems to adopt my version of the events
14 of August 17. And you respond, Oh, I did not forget
15 that. Yes. Fing stupid I want 10 percent. You'll
16 Dave on taxes.

17 A. That was "save." It probably meant
18 "save."

19 Q. Okay.

20 A. I was probably joking with him.

21 Q. You're teasing him about his eventual --

22 A. Yeah.

23 Q. -- I guess, judgment in a lawsuit; is
24 that --

25 A. Exactly.

1 Q. Okay.

2 A. I'm just teasing with him on that.

3 Q. Okay. And am I correct that Ms. Bond and
4 Mr. Nguyen are all joking about this anticipated
5 lawsuit against the local and the International?

6 A. Yeah. I think this whole page seems to
7 just be joking about the fact that they actually
8 wrote what they wrote about Sharon on August 17th --

9 Q. And also --

10 A. -- and just joking about it, yeah.

11 Q. Oh, I'm sorry.

12 A. Yeah. That was just it. We're just
13 joking about that here.

14 Q. And you're also talking specifically,
15 though, about a payout from a lawsuit against the
16 local and the International union, right?

17 A. Well, like I just said, we were just
18 joking about that based on -- based on what was
19 mentioned on the bottom of Page 9 --

20 Q. Right.

21 A. -- the fact that they actually said what
22 they said in terms of basically confirming
23 everything that we just said occurred, the
24 International simply reaffirmed that.

25 Q. At the bottom of Page 10, you say, Peter

1 Inc. - doing what Wall Street does, but with a
2 personal touch. Taking money from stupid assholes.

3 A. Yeah.

4 Q. There you're referring -- you're
5 teasing --

6 A. Yeah, I'm just joking, but it's referring
7 to, obviously, them.

8 Q. And the anticipated lawsuit, right?

9 A. Well, yeah.

10 Q. And the taking money from stupid assholes
11 in this instance would be the local and the
12 International, perhaps, in a lawsuit; is that right?

13 A. Correct.

14 Q. Okay. Did you know at the time that
15 Mr. Nguyen had sued his former employer, your former
16 employer?

17 A. Yes.

18 Q. That's the United Public Union Number 1;
19 is that right?

20 A. Public Employees Union --

21 MR. MCAVOYAMAYA: I'm also going to make
22 a standing objection to the relevance of any
23 discussion about Peter Nguyen's prior litigation
24 with a different union employer. That has no
25 bearing on the issues in this case, so that will be

1 master's degree, and she didn't even understand a
2 budget or revenue expenses, just basic stuff. So
3 that was just my dig on that. That's all it was --

4 Q. Got it. Okay.

5 A. -- and Sharon being the VP.

6 Q. Got it.

7 (Exhibit No. 31 marked
8 for identification.)

9
10 BY MR. COHEN:

11 Q. Mr. Clarke, I'm showing you what's been
12 marked as Exhibit 31.

13 Do you recognize this document?

14 A. Yeah. It looks like text messages

15 Q. Okay. And these were text messages from
16 your personal phone that you retrieved?

17 A. Correct.

18 Q. Okay. Am I correct that the text
19 messages are between April 27th and April 28th,
20 2017?

21 A. Correct.

22 Q. And it's between you and Mr. Nguyen
23 correct?

24 A. Correct.

25 Q. Okay. And on the first page, you're --

1 it appears that you're talking about the trusteeship
2 still, correct?

3 A. Yes.

4 Q. And, again, the dark messages are your
5 messages to Mr. Nguyen on the right, and on the left
6 are his messages to you, correct?

7 A. Right.

8 Q. Okay. So let's turn to Page 3. At the
9 top of the page, you say, Be careful. Dana is using
10 union phone to text. I spoke with her, so don't
11 text her about it.

12 Why are you warning Peter not to text
13 with Dana?

14 A. That's the same answer to those questions
15 you asked before.

16 Q. Okay.

17 A. All these messages where I'm saying,
18 Don't use the union stuff, don't e-mail, don't text,
19 it's because I see that they -- they were spier
20 people who were using -- you know, who are
21 communicating about this issue. So it's the same
22 answer for all of these questions.

23 Q. Okay. And, again, when you say
24 "communicating about this issue," you don't just
25 mean communicating about the trusteeship; you mean

1 A. I -- yeah. So far, I don't think --
2 yeah, because you've just given me Peter and Andrea,
3 and, I think, Cherie.

4 Q. Okay. So, I mean, I'll represent to you,
5 I've gone through the texts that we have looked at
6 so far and haven't seen any from Dana Gentry, but it
7 appears that you're specifically concerned about
8 Dana's texts.

9 So is there some other group of text
10 messages other than the ones that we've looked at
11 that involved her?

12 A. Well, if Dana was texting and it's not
13 here, then I guess I don't have those texts. I
14 think -- I think there were other people throughout
15 these texts like, I think, Luisa and Debbie, I
16 think, had mentioned that they had texted with Dana,
17 I believe.

18 So I'm probably referring to those types
19 of texts, like she's -- you know, she was texting
20 them, I believe.

21 Q. And then at the bottom of that page, do
22 you see where Mr. Nguyen says, Tell her to delete
23 them, and then he says, She probably needs to do a
24 clean reset.

25 Do you see that?

1 A. Yeah, I see that.

2 Q. And then at the -- Page 4 at the top, you
3 respond, I told her - she doesn't seem to quite
4 understand ... thinks that she hasn't said anything
5 bad.

6 A. Right.

7 Q. So you told her to delete her text
8 messages, correct?

9 A. I probably would have told her to -- if
10 she was using the union phone about -- talking about
11 the -- talking about the trusteeship. I mean, I
12 think regarding that, when I say I told her, it
13 probably means I told her to do that.

14 I don't -- I don't specifically remember
15 that conversation, but I think it's reasonable to
16 conclude that I probably said that to her --

17 Q. Okay.

18 A. -- but, again, it would have been talking
19 about -- just talking about the whole trusteeship
20 issue.

21 Q. Got it.

22 A. See where Peter says, Impress upon her
23 that things can be misconstrued against her?

24 Q. Yes.

25 A. So we're not talking about anything bad.

1 It's just that it could be misconstrued. That was
2 -- that was the issue, so --

3 Q. Okay.

4 A. -- just to fully answer your question.

5 Q. Sure.

6 (Exhibit No. 32 marked
7 for identification.)

8

9 BY MR. COHEN:

10 Q. Mr. Clarke, I'm showing you a document
11 that's been marked as Exhibit 32.

12 Do you recognize this text thread?

13 A. Yeah. It's some other text messages,
14 yes.

15 Q. Okay. And these are additional text
16 messages that you retrieved from your personal
17 phone?

18 A. Correct.

19 Q. And the thread is dated from April 30th
20 to April 30th, 2017, correct?

21 A. Correct, correct.

22 Q. Okay. And it's between yourself,
23 Mr. Nguyen, Ms. Bond, Ms. Troyano, Ms. Mancini, and
24 another phone number that's unidentified, right?

25 A. Correct.

1 Q. Okay. First, do you know who that fifth
2 phone number belongs to?

3 A. I do not.

4 Q. Okay. And I see on the first page that
5 Mr. Nguyen is confirming that this thread is all
6 personal numbers.

7 Do you see that?

8 A. I see that.

9 Q. And is it your understanding that the
10 reason for creating a text thread with personal
11 numbers was to shield them from review by the
12 trustees?

13 A. Right.

14 Q. Okay. Now, I see Cherie Mancini's on
15 this text thread.

16 Do you see that?

17 A. Yes, I do.

18 Q. Do you know why she was included on this
19 text thread?

20 A. No, I don't know why.

21 Q. Okay. At this time, she had been removed
22 from office, correct?

23 A. Depending on the date. When was she
24 removed?

25 Q. Well --

1 spoke with -- I might have had a communication with
2 Debbie and Fredo, maybe.

3 Q. Okay.

4 A. I just can't recall.

5 Q. And they were both people who you
6 perceived to be supporters of Cherie, correct?

7 A. Correct.

8 Q. Okay. And what would have been the
9 purpose, do you recall, of that communication with
10 them?

11 A. No. I -- you know, I don't -- I don't
12 recall. I don't recall that, but --

13 Q. Okay. At some point, you were informed
14 that you were terminated from Local 1107, correct?

15 A. Correct.

16 Q. And tell me how that came about.

17 Who informed you?

18 A. Steve Ury and Martin Manteca.

19 Q. Okay. And was that at a face-to-face
20 meeting?

21 A. Yes.

22 Q. And where was that meeting?

23 A. It was held at the office, Local 1107
24 office.

25 Q. Okay. And at that meeting, besides

1 Mr. Ury, Mr. Manteca, and yourself, was anyone else
2 present?

3 A. At that meeting, no.

4 Q. Okay. And tell me what happened at the
5 meeting.

6 A. They presented me -- sat down with me and
7 -- we sat down. They presented me a letter
8 informing me that, due to the trusteeship, that they
9 were going to be, you know, terminating, you know,
10 my services.

11 Q. Okay. And did they say anything else
12 that you recall?

13 A. I mean, there was some other things said.
14 I just don't recall. They probably -- I think they
15 gave me information about COBRA for health
16 insurance. I believe they did that.

17 I know I asked about some personal things
18 that were in the office that they neglected to, you
19 know, obtain because they didn't know.

20 They -- at first, they didn't want me to
21 walk back to the office, but I wanted to go get the
22 things that -- and there were things back there that
23 were mine that they didn't realize, so --

24 Q. Okay. Did they present to you in writing
25 a termination letter?

1 A. Yes.

2 Q. Okay.

3 (Exhibit No. 33 marked
4 for identification.)

5

6 BY MR. COHEN:

7 Q. Mr. Clarke, I'm showing you what's been
8 marked as Exhibit 33.

9 Do you recognize that document?

10 A. Yes, I do.

11 Q. And was this the termination letter that
12 you received at that meeting?

13 A. Yes.

14 Q. Okay. Did what Mr. Manteca conveyed to
15 you depart from what's described in this letter?

16 A. No.

17 Q. Okay. Did he say anything about the
18 reason that you were terminated that was different
19 from what is described in this letter?

20 A. No.

21 Q. Okay. So this letter accurately reflects
22 what Mr. Manteca conveyed to you about the reason
23 for your termination at that meeting?

24 A. Correct.

25 Q. Now, did Mr. Ury do any talking during

1 Q. Okay. Did you continue to have an
2 interest in that lawsuit after you were terminated?

3 A. Yes, I did.

4 Q. And --

5 MR. MCAVOYAMAYA: Also, objection. That
6 calls for a legal conclusion as regards to having an
7 interest, so that's the only thing that I have an
8 issue with. Okay.

9 BY MR. COHEN:

10 Q. Were you interested in the status of that
11 lawsuit?

12 A. I did want to know what was happening
13 with it.

14 Q. Okay. At some point, did you lose
15 interest?

16 A. No, I didn't lose interest. I was
17 curious as to what was going on with it.

18 Q. Okay. Okay. At some point after you
19 were terminated, Mr. Clarke, were you involved in an
20 effort to draft a press release that was critical of
21 the trusteeship?

22 A. That's possible. That's definitely
23 possible.

24 Q. Do you remember going to Dana Gentry's
25 house with a group of other people to discuss a

1 So -- but, like I mentioned to you, I
2 know I was there, and more than likely, it could
3 have been about the press release, but I think Dana
4 would know for sure, and probably Peter would know
5 for sure, but it does sound more than likely
6 correct.

7 Q. Do you recall who invited you to the
8 meeting?

9 A. No, I don't recall who invited me.

10 Q. Okay. Do you recall other meetings with
11 that same or similar group of people about the
12 trusteeship at that time?

13 A. No. I think that was maybe -- I believe
14 that might have been the only meeting where it
15 was -- where Dana, Cherie, myself, and Peter were
16 together. I believe that was the only one.

17 Q. Okay. I want to show you what's been
18 previously marked, Mr. Clarke, as Exhibit 18.

19 A. Okay.

20 Q. Does that document look familiar to you?

21 A. Yeah, the document kind of looks familiar
22 to me.

23 Q. And do you recall that one of the things
24 that was discussed at that meeting you described was
25 the preparation of this press release?

1 A. Like I said, I mean, it probably, you
2 know, was. I'm not necessarily disagreeing with
3 that. I just wasn't really involved in crafting it
4 like that. So this was probably what was discussed
5 at that meeting.

6 Q. So Exhibit 18 includes many assertions
7 about the trusteeship and the trustees and what was
8 happening at Local 1107 at the time.

9 Did you have independent knowledge about
10 the assertions in this press release?

11 A. Independent knowledge? What do you mean
12 by that?

13 Q. So I guess -- I mean, we could take, for
14 example -- look at five paragraphs down. It says,
15 With regard to the Southern Nevada Health District,
16 the trustees placed in control by the International
17 union have refused to move forward with charges of
18 bad faith and regressive bargaining and intimidation
19 of union bargaining team members.

20 A. Okay.

21 Q. Is that something that you personally
22 knew about?

23 A. No.

24 Q. The --

25 MR. MCAVOYAMAYA: I'm also going to do

REPORTER'S CERTIFICATE

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STATE OF NEVADA)
) ss
COUNTY OF CLARK)

I, Wendy Sara Honable, CCR No. 875, a duly certified court reporter licensed in and for the State of Nevada, do hereby certify:

That I reported the taking of the deposition of the witness, ROBERT L. F. CLARKE, at the time and place aforesaid;

That prior to being examined, the witness was by me duly sworn to testify to the truth, the whole truth, and nothing but the truth;

That I thereafter transcribed my shorthand notes into typewriting and that the typewritten transcript of said deposition is a complete, true and accurate record of testimony provided by the witness at said time to the best of my ability.

I further certify (1) that I am not a relative, employee or independent contractor of counsel of any of the parties; nor a relative, employee or independent contractor of the parties involved in said action; nor a person financially interested in the action; nor do I have any other relationship with any of the parties or with counsel of any of the parties involved in the action that may reasonably cause my impartiality to be questioned; and (2) that transcript review pursuant to NRCP 30(e) was requested.

IN WITNESS WHEREOF, I have hereunto set my hand in the County of Clark, State of Nevada, this 19th day of June 2019.

Wendy Sara Honable
Wendy Sara Honable, CCR No. 875

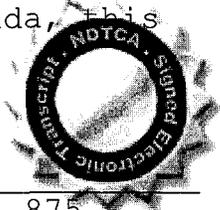


EXHIBIT D

July 5, 2016

Ms. Cherie Mancini
Office of the President
SEIU Nevada, Local 1107
3785 E. Sunset Road
Las Vegas, NV 89120

RE: Director of Finance & Human Resources

Dear Ms. Mancini:

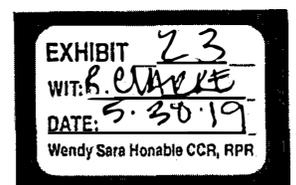
I have always believed in the mission of unions and their commitment to obtain fair working conditions for all employees. Unfortunately, too many people today have forgotten how many of their workplace benefits are provided because of the work unions did in the past and continue to do today. I live in a "right-to-work" state which means, as you know, one does not have to join the union. However, like you, I believe in unions and the work they do, and for five years, when I was not a manager, I voluntarily chose to be a member of the Washington-Baltimore Newspaper Guild and to gladly pay my union dues.

I understand the position of Director of Finance & Human Resources entails a tremendous amount of responsibilities. I believe my education at U.C. Berkeley, recent position as Chief Financial Officer, experience in accounting, tax, investments, risk management, human resources, operations, regulatory filings, and my demonstrated ability to build trust and a shared common vision, will enable me to perform the duties of Director of Finance & Human Resources and contribute to the overall goals of SEIU Nevada, Local 1107.

If you have any questions or need any references, please feel free to email me at rlfclarke@outlook.com or to call me at 202-549-1570. Thank you in advance for your consideration and I look forward to hearing from you.

Sincerely,

Robert L. F. Clarke



Gentry-Clarke000095



August 23, 2016

Robert Clarke

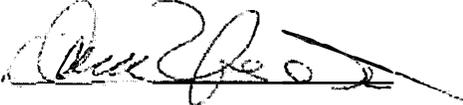
I am pleased, on behalf of the membership of the Service Employees International Union, Local 1107, to extend to you this offer of employment with our organization, in the capacity of Director of Finance & Human Resources. This offer of employment shall commence on September 6, 2016.

The wage and benefit package for this position includes the following:

1. Effective **September 6, 2016**, you will commence employment with Local 1107. The annual salary for your position will be \$80,000.
2. Effective **October 1, 2016**, you will be entitled to a fully employer-funded health care plan including medical, dental, vision and prescription benefits.
3. Pension benefit where 20% of your gross salary is contributed to the Affiliates Officers and Employees Pension Fund administered by the Service Employee International Union Benefits Office. Such contributions shall be in addition to the other wage and economic benefits provided herein.
4. Commencing on your first full pay period, the accrual of eight (8) hours of leave for each bi-weekly pay period, which may be used for sick leave, vacation, or personal leave.
5. An auto allowance of \$500.00 will be paid once a month, usually the first pay period of that month.
6. A one-time relocation reimbursement of \$2,500.00 will be paid within two weeks of the commencement of your employment.
7. Termination of this employment agreement may be initiated by the SEIU Nevada President for cause and is appealable to the local's Executive Board, which shall conduct a full and fair hearing before reaching a final determination regarding your employment status.

SERVICE EMPLOYEES
INTERNATIONAL UNION
LOCAL 1107, CTW, CLC

On behalf of the officers and staff of Local 1107, I would like to express how very excited we are that you have decided to join us.

Sincerely, 

Cherie Mancini
President
SEIU Nevada Local 1107

3785 E. Sunset Drive
Las Vegas, NV 89120

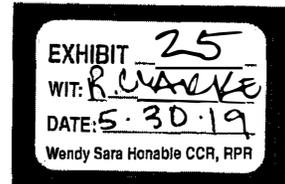
PHONE 702-386-8819
FAX 702-386-4883

WWW.SEIUNV.ORG

I accept this offer and will begin work on September 6, 2016.

Signed: 
Robert Clarke

Date: 8/23/2016



SEIU Local 1107 seeks a Director of Finance and Human Resources

POSITION DESCRIPTION

The Director of Finance and Human Resources is responsible for the financial health of the Local and is directly responsible for financial management, general office administration, personnel systems, technology, legal compliance, and reporting.

This is a full-time position that offers a competitive salary and benefits package. The Director of Finance and Human Resources is a senior level position and reports directly to the president of the Local.

ESSENTIAL FUNCTIONS

Financial Management

- Maintain accurate records in Quickbooks, prepare monthly financial statements, monitor and improve systems for accounts payable and receivable, review invoices, prepare checks for payments;
- Process payroll through ADP, assure benefits are properly distributed and recorded;
- Maintain all vendor and financial files for the Local;
- Analyze and advise on revenue and expense trends and cash flow projections;
- Lead in annual budget planning and prepare month and year-to-date reports for the Finance Committee and Executive Board
- Establish, improve, and monitor internal controls;
- Review and analyze bank accounts and credit card statements, ensure proper documentation for all activity, reconcile monthly;
- Prepare deposits for the bank, establish and maintain bank relationships, assess the value of account structure to limit liability;
- Maintain PAC and COPE accounts for political funds of the Local, transfer political dues funds to International, ensure COPE funds are returned to the Local once quota has been met;
- Calculate and prepare Per Capita reports and payments to International and other relevant entities;
- Oversee period-end accounting procedures;
- Troubleshoot complex bookkeeping issues and technical problems in accounting software and data;
- Develop custom financial reports and other analysis tools;
- Prepare for and schedule the annual audit, coordinate with the auditor, assist in filing LM-2, DOL and other local and federal government reporting requirements.
- Perform periodic audits for Pension and Health and Welfare funds as directed by International;
- Manage cash and maintain all P&L and Balance Sheet accounts;
- Reconcile affiliate member dues to ensure proper income from employers;
- Oversee all tax and reporting obligations
- All other financial and accounting procedures and related matters.

EXHIBIT 26
WIT: R. CLAYTON
DATE: 5.30.19
Wendy Sara Honable CCR, RPR

Human Resources

- Serve as the primary Human Resource Manager for the Local;
- Maintain staff personnel records, including the tracking of employee time and attendance, maintain current and accurate records for employee benefits relating to the International Pension and Health and Welfare Funds;
- Assure adequate systems for certain personnel administration, such as legal reporting, time-tracking, specifically PTO, Lost Time, pensions and health benefits;
- All other matters pertaining to personnel administration.

Political Reporting

- Otherwise build, implement, and improve systems for complying with state and federal laws regarding campaign finance and lobbyists' activities.

Office Administration

- Maintain leases, contracts, equipment and office space for the organization.

REQUIRED KNOWLEDGE AND EXPERIENCE

- 5+ years progressive experience in bookkeeping or accounting (preferably in the labor movement);
- Competence with accounting software, specifically Quickbooks and familiarity with ADP
- Bachelors in Accounting and/or Certified Public Accountant (CPA)
- Excellent computer skills in Windows operating systems and in a broad range of office and communications applications. This should include a basic understanding of databases and an advanced facility with spreadsheets,
- Familiarity or experience with state and federal campaign-finance disclosure;
- A demonstrated ability to prioritize work and achieve success with minimal supervision;
- Excellent communication skills,
- Work with labor movement and all financials aspects of labor related accounting practices

Salary and Benefits

Salary depending on experience. Excellent full benefits package provided.

TO APPLY

Send cover letter and resume to Jenny Valdecantos at jvaldecantos@seiuunv.org. No phone calls please.

Subject line: "Director of Finance and Human Resources"

Chat with Peter & Andrea

4/26/2017 1:21:13 PM - 4/30/2017 3:42:58 PM

Export Details:

Device Phone Number (202) 549-1570

Device Name WxYz

Device ID 3a0d3197f35bd47d1abda03a35d755f5e6fa7f7b

Backup Date Sunday, April 30, 2017 11:16 PM

Backup Directory C:\Users\User\AppData\Roaming\Apple Computer\MobileSync\Backup\3a0d3197f35bd47d1abda03a35d755f5e6fa

iOS 10.3.1

Current Time Zone (UTC-08:00) Pacific Time (US & Canada)

Created with iExplorer v4.2.6.0

Participants:

+1 310-774-7777, Peter 'Phong' Nguyen JD

+1 678-777-4570, Andrea Bond

Wednesday, April 26, 2017

Andrea Bond

Apparently the international issued an email today to the eboard saying that Sharon and Cherie are both suspended. I'm trying to get details- but thought you both should know.

2:15 PM

The staff is panicked because Michelle and Keishe showed up together saying "did you see the email" "oh you will"

...and now Sharon just showed up.

Robert

FUCK

4:15 PM

Robert

So who is in charge?

2:17 PM

Peter 'Phong' Nguyen JD

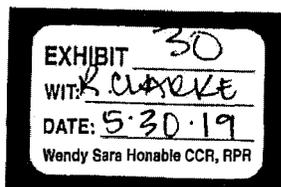
What?

8:15 PM

Robert

This is not a dream

8:15 PM



Robert
It happened 8:19 PM

Andrea Bond
We are trusteeed 8:20 PM

Robert
Oh btw - intl hand delivered ur case against them - can't believe they wrote what they wrote about Sharon 8:20 PM

Robert
it'll be a whole new world when u get back...rest up 8:21 PM

Peter 'Phong' Nguyen JD
So who's in charge? 8:22 PM

Peter 'Phong' Nguyen JD
Can you send a copy of what they wrote? 8:23 PM

Peter 'Phong' Nguyen JD
I just landed in Moscow and now this...I can never go on vacation! 8:24 PM

Robert
Peterjkd? 8:24 PM

Peter 'Phong' Nguyen JD
Yes 8:24 PM

Robert
I'm ahead of u 8:25 PM

Robert
Check ur email 8:25 PM

Peter 'Phong' Nguyen JD
Ok 8:25 PM

Peter 'Phong' Nguyen JD
Who's giving Day-to-day instructions? 8:25 PM

Robert
Don't know - intl sent two monitors 8:25 PM

Peter 'Phong' Nguyen JD
Who are they? 8:26 PM

Robert
 It's in the letter from Mary Kay 8 26 PM

Peter 'Phong' Nguyen JD
 Not Bryan and Grace? 8 26 PM

Peter 'Phong' Nguyen JD
 Ok 8 26 PM

Robert
 No 8:26 PM

Andrea Bond
 It's Kathleen Ebby and Steve Yry (so?) I met them tonight- slimy nimrods 8 28 PM

Peter 'Phong' Nguyen JD
 8 28 PM

Andrea Bond
 Kathleen was talking to me and Ysidro said- oh I'm sorry my husband is calling. I followed her out of the hall room and she walked right into the conference room with Michelle, Clara, Sheila and I think Sharon 8:29 PM

Andrea Bond
 They wouldn't let Cherie stay- she is a hot fucking mess 8 29 PM

Andrea Bond
 No more eboard- no more at large officers- effective immediately twiddle dee and twiddle dumb are in charge... 8:30 PM

Peter 'Phong' Nguyen JD
 Yikes... well, look out for one another while I'm away. Also, document every conversation. Also, don't let them mess with me in my absence, please. 8.31 PM

Andrea Bond
 I hope Chad can still start Monday!! 8 31 PM

Peter 'Phong' Nguyen JD

Well, The local made a commitment to him, so I think we are legally obligated to follow through, even under new leadership. How is the staff holding up?

8:32 PM

Andrea Bond

Not well honestly

8:33 PM

Peter 'Phong' Nguyen JD



8:34 PM

Robert

Apparently the local eboard voted to trustee

8:34 PM

Robert

That's what LaNita said

8:34 PM

Peter 'Phong' Nguyen JD

But that somehow went hand-in-hand with the suspensions of both Cherie and Sharon?

8:34 PM

Robert

If true, self inflicted

8:35 PM

Robert

Yes

8:35 PM

Peter 'Phong' Nguyen JD

But what are those two separate and independent ask, ordered one result from the other?

8:35 PM

Robert

But they voted to trustee so that part dosnt make sense to me

8:36 PM

Peter 'Phong' Nguyen JD

Sorry, what are those two separate and independent acts, or did one lead to the other?

8:36 PM

Peter 'Phong' Nguyen JD

*were

8:36 PM

Robert

Separate

8:36 PM

Robert

If true, intl must have told them to do it

8:36 PM

Robert

Again doesn't make sense to me

8:37 PM

Peter 'Phong' Nguyen JD

So the international was going to suspend both of them anyway, even at the local did not ask to be trustees?

8:37 PM

Robert

U'd have to be a fucking idiot to vote to trustee

8:37 PM

Robert

I guess

8:37 PM

Peter 'Phong' Nguyen JD

And yet look who we're dealing with...

8:37 PM

Andrea Bond

I had to step in between Cherie and Michelle today because Michelle was trying to get Cherie in the room with Sharon, Keishe and Michelle. I stepped in between them and said, oh no - now is not the time for that- she needs a minute. She just found out- Michelle started yelling at me telling me not to talk to her that way- telling me to come back (because I was escorting Cherie away) - saying don't walk away- I just got here so I had no right-

8:38 PM

but guys - Cherie would have lost her shit in the same room as Sharon today. She was crying and screaming- it was horrible

Andrea Bond

Tanisa said they absolutely voted to be trusteeed and then realized what hat meant. Clara had the audacity at the end to say- so Cherie is still suspended right- she can't be voted back in...

8:39 PM

Andrea Bond



8:39 PM

Andrea Bond
What da fun 8:39 PM

Robert
lol lol u can't write this shit - they voted themselves 8:40 PM

Robert
So much for having the board on ur side 8:40 PM

Andrea Bond
So fucking stupid 8:41 PM

Robert
So how's the vacation coming along? 8:43 PM

Peter 'Phong' Nguyen JD
We did repeatedly warn Cherie to mind her board. 8:43 PM

Robert
Yes WE FING DID!!! 8:43 PM

Andrea Bond
Right - back to important things...how are you 8:43 PM

Peter 'Phong' Nguyen JD
First day in NYC with friends was great! We ate at one of my favorite steak houses, and I had a great time. I am now in Moscow transferring to a flight that will take me to Hanover Germany. 8:43 PM

Andrea Bond
I thought trustee was a possibility- but I knew it was going to happen when Brandi was here. She evaluated each of us and submitted it to international 8:44 PM

Andrea Bond
Enjoy!! 8:44 PM

Andrea Bond
Robert how is Chicago 8:44 PM

Robert
well she told cherie to get rid of Julie b/c that was intl plan - cherie shoulda done it on day one 8:46 PM

Robert

Chicago is beautiful- but honestly can't enjoy it that much for obvious reasons

8:46 PM

Peter 'Phong' Nguyen JD

I'm sorry I can't be there to support the rest of you, especially you, Andrea. I feel a measure of responsibility getting you involved in this deficient organization.

8:48 PM

Andrea Bond

It's not your fault SEIU is a clusterfuck. I'm happy you brought me on- this is the most hilarious story of how our consulting biz started

8:54 PM

Peter 'Phong' Nguyen JD

True!

8:55 PM

Andrea Bond

So people are already saying I'm not working for the local anymore....talk about warm and fuzzy

9:05 PM

Someone told Theresa Diaz that

Robert

Theresa just told u?

9:06 PM

Andrea Bond

Theresa told Romina. Romina called me to say what happened to you today, you ok- I was like why what did you hear? She said Theresa told her this evening that she was told that by someone at SEIU office

9:07 PM

Peter 'Phong' Nguyen JD

What input did Barry and Brandie have?

9:07 PM

Andrea Bond

Unless Brandie lied - which who knows- she recommended that I say with some other few names. Lanita told my my eval was really good

9:08 PM

Andrea Bond

Stay*

9:09 PM

Peter 'Phong' Nguyen JD

Interesting...

9:09 PM

Robert

Recommended what?

9:10 PM

Peter 'Phong' Nguyen JD

Robert warned Cherie they were evaluating how to trustee. I even said to Cherie that she needed to give up Carson City, because without her power base in the local, there would be no Carson City in the future.

9:10 PM

Andrea Bond

She recommended that I stay at SEIU- that I not be cut.

9 11 PM

Peter 'Phong' Nguyen JD



9 12 PM

Andrea Bond

Who knows...when it happens I'll figure it out. Obviously life goes on beyond SEIU...

9 12 PM

Peter 'Phong' Nguyen JD

Yup

9 12 PM

Peter 'Phong' Nguyen JD

Although these trustees have any smarts to them after they see what your current workload is, they would be foolish to get rid of you.

9:13 PM

Robert

I also said that no comment from Intl since hearing could mean bad news for cherie and other officers

9:13 PM

Robert

Nobody listened

9:13 PM

Peter 'Phong' Nguyen JD

Right.

9:13 PM

Robert

I also said we needed to find a way to work with everyone

9:13 PM

Robert

Since it was obvious no vote

9:14 PM

Robert

Whipping was gonna happen

9:14 PM

Peter 'Phong' Nguyen JD

Andria, Ray from Saint Rose texted my SEIU Cell phone which does not have international service. Could you please give him my personal cell phone and ask him to text me on this line?

9:22 PM

Andrea Bond

No one listens. Because we are hired help and not paid consultants. Hence our future endeavors...

9 22 PM

You guys enjoy your trips- I'm going to drink something entirely too strong, crawl in my bed and plot my future

Peter 'Phong' Nguyen JD

Okay, please don't make any final decisions without us.

9 22 PM

Andrea Bond

Yeah of course I will for Ray. It was hard to see Cherie like that today. I could feel everyone's heart breaking for her....I know she misstepped but damn. She really didn't deserve this

9:24 PM

Peter 'Phong' Nguyen JD

True, but sometimes, the margin for error in life is small.

9 25 PM

Robert

Or nonexistent

9:25 PM

Peter 'Phong' Nguyen JD

I know she means well, but he missteps were too many.

9:25 PM

Peter 'Phong' Nguyen JD

Keep in mind, the night that she walked up to Clara and almost punched her, Steve Yuri was in attendance.

9 25 PM

Robert

No team ever wins a championship that way

9:26 PM

Robert

No matter how good they are

9:26 PM

Peter 'Phong' Nguyen JD

Robert, I am reading the international report, and it basically seems to adopt my version of the events of August 17!

9:26 PM

Robert

Oh I did not forget that

9:26 PM

Robert

Yes

9:27 PM

Robert

FING stupid

9:27 PM

Robert

I want 10%

9:27 PM

Robert

U'll Dave on taxes

9:27 PM

Peter 'Phong' Nguyen JD

Well, that either means that I'm very secure my position, or they were willing to incriminate themselves and face the music later.

9:27 PM



Peter 'Phong' Nguyen JD



Haha

9:27 PM

Robert

U can pay my company reduce your tax bracket- Andrea may want a cut too

9:29 PM

Andrea Bond



Of course I want a cut! I was at every tpo hearing!

9:29 PM

Peter 'Phong' Nguyen JD



Like you often say... "sure".

9:29 PM

Andrea Bond



Lol

9:29 PM

Peter 'Phong' Nguyen JD



Andrea was very supportive!

9:29 PM

Robert

Peter Inc. - doing what Wall Street does...but with a personal touch

9:30 PM

Robert

...taking money from stupid assholes

9:30 PM

Peter 'Phong' Nguyen JD



9:30 PM

Peter 'Phong' Nguyen JD

You forgot to add "with unimpeachable competence"! That's the key to it all...

9:31 PM

Peter 'Phong' Nguyen JD

We also warned Cherie about using Roberts Rules of Order, and the report specifically calls were out for not doing so.

9:32 PM

Robert

Right...it's everything we said verbatim...

9:33 PM

Robert

Gonna toss my Samsung they must have been listening

9:34 PM

Peter 'Phong' Nguyen JD

She simply did not listen!

9:34 PM

Peter 'Phong' Nguyen JD



9:34 PM

Robert

Plus some of the things - unilateral decisions wasn't necessary just get the votes

9:34 PM

Andrea Bond

...be consistent and stick to your directives and decisions...take it to vote and run with it...

9:35 PM

Peter 'Phong' Nguyen JD

Ultimately, by not using parliamentary procedure and mustering her votes, she played into the argument that the local was in chaos and not governed properly.

9:36 PM

Robert

I feel for Cherie but right now the three of us need to survive

9:37 PM

Peter 'Phong' Nguyen JD

True that.

9:37 PM

Robert

We tried to help her - genuinely

9:38 PM

Peter 'Phong' Nguyen JD

Exhaustively...

9:38 PM

Peter 'Phong' Nguyen JD

While I do sympathize with her, my conscience is clear. I did my duty to her and more.

9:38 PM

Robert

You and Andrea are working like slaves whilst being insulted

9:38 PM

Robert

Exactly dude

9:39 PM

Peter 'Phong' Nguyen JD

Clearly.

9:39 PM

Andrea Bondi

This has been a learning experience for me. I have no regrets and my conscience is clear also. By you are right- it's survival time #savage #next #toogood

9:42 PM

Peter 'Phong' Nguyen JD

I see the Krome contract which you earned her about bit her.

9:42 PM

Peter 'Phong' Nguyen JD

*warned

9:42 PM

Peter 'Phong' Nguyen JD

(For Robert)

9:42 PM

Peter 'Phong' Nguyen JD

Also, is it true that she did not submit the staff collective-bargaining agreement for ratification by the board? That would be a major oversight!

9:43 PM

Robert

Yep!!!!

9:43 PM

Robert

\$40k

9:43 PM

Robert

Stupid

9:43 PM

Peter 'Phong' Nguyen JD



10:00 PM

Andrea Bond

Tanisa told me wrong I think- it sounds like there is going to be eboard still- just no more at large officers

10:23 PM

Robert

and they voted for that

10:23 PM

Peter 'Phong' Nguyen JD

But is the E board in charge or are the two trustees in charge?

10:23 PM

Andrea Bond

Yes they did vote themselves out. Apparently the international encouraged the trusteeship amongst the resistance. They voted the way the international told them to- and when the vote was complete the same international said- okay great no more at large officers

10:30 PM

They really didn't know

Peter 'Phong' Nguyen JD

Lol

10:30 PM

Robert

I can't believe Cherie's supporters voted that way

10:31 PM

Andrea Bond

It sounds like the "monitors" will be making day to day decisions... I'm not sure it's really not clear

10:31 PM

Robert

Yes, that's my understanding

10:31 PM

Robert

They are the new president

10:32 PM

Andrea Bond

Correct- well pres and ego

10:32 PM

Andrea Bond
 **Evp*** 10 32 PM

Peter 'Phong' Nguyen JD
Again, it's a symptom of her not being solid with her voting bloc on the board, and her rolling in the mud with the crazy ones. 10 32 PM

 **So Peter r u gonna be negotiating at all those tables?** Robert 10:32 PM

Peter 'Phong' Nguyen JD
 **Not sure...** 10 33 PM

Andrea Bond
 **So many unknowns** 10 33 PM

Peter 'Phong' Nguyen JD
 **Yup...Steve holding up okay?** 10 35 PM

Andrea Bond
 **He and I were already working on Cherie's appeal. Yeah- he's doing great all things considered. He so great at research lol** 10 39 PM

Peter 'Phong' Nguyen JD
 **Cool.** 10:39 PM

Andrea Bond
 **I like his attitude about most things. Today was no different. He likes to determine the best course of action and then take it. Tom Sharpe seems to like him also...** 10:40 PM

Peter 'Phong' Nguyen JD
  10:41 PM

Thursday, April 27, 2017

Peter 'Phong' Nguyen JD
 **Any additional news?** 11 22 PM

Friday, April 28, 2017

 **Okay...** Robert 4 27 PM

 **They just removed me from Paychex!** Robert 4 27 PM

Peter 'Phong' Nguyen JD
 **Okay...** 4 27 PM

Peter 'Phong' Nguyen JD



Who's doing payroll?

4:28 PM

Robert

Don't know

4:28 PM

Robert

Oh wait

4:28 PM

Robert

Luisa and Martin

4:28 PM

Peter 'Phong' Nguyen JD



Should be interesting when they meet with you, then.

4:29 PM

Robert

Well I'm assuming it's over

4:29 PM

Peter 'Phong' Nguyen JD



Think so?

4:29 PM

Robert

Well they r changing password taking complete control - they have no reason to think I'm corrupt right?

4:30 PM

Peter 'Phong' Nguyen JD



True...wonder if it's protocol before they give back some control?

4:31 PM

Robert

Could be - I'll have to remind them I'm the one who started paying proper per caps

4:31 PM

Andrea Bond



Fuck-

4:35 PM

Andrea Bond



I don't know that it's over over though

4:36 PM

Robert

Yeah I know

4:36 PM

Peter 'Phong' Nguyen JD



We shall see...👉

4:37 PM

Andrea Bond
Maybe until they speak to everyone they are limiting all access 4:37 PM

Andrea Bond
We just have to show up Monday and hope for the best 4:37 PM

Peter 'Phong' Nguyen JD
That's my thought. 4:37 PM

Peter 'Phong' Nguyen JD
True. 4:37 PM

Robert
Yeah that makes sense- but again there's been no accusation of theft 4:38 PM

Robert
I agree 4:38 PM

Andrea Bond
Did you see Dana text from earlier 4:38 PM

Robert
..and at least it's 10:00AM! 4:38 PM

Robert
From Mike P? 4:38 PM

Andrea Bond
Yep- they suspend everyone and bring back who they want 4:38 PM

Andrea Bond
So that probably explains the payroll...right?! 4:39 PM

Peter 'Phong' Nguyen JD
Perhaps, but unless they were going to make a move against Robert, why not just direct him to do what they want? 4:39 PM

Robert
That's what I thought 4:39 PM

Andrea Bond
For the same reason they told all staff not to come in today- they want to assess everyone individually I think 4:40 PM

Andrea Bond

Who knows...we just have to wait and see. Remember we are not dealing with the brightest crayons in the box either 4:40 PM

Robert

Lol 4:41 PM

Peter 'Phong' Nguyen JD

What about Chad? 4:49 PM

Robert

I can email trustees 4:50 PM

Robert

And let them know he's coming 4:50 PM

Peter 'Phong' Nguyen JD



5:02 PM

Robert

Hey what time was he supposed to report on Monday? 5:12 PM

Robert

Andrea will he be crashing at your spot? 5:13 PM

Andrea Bond

He's taking things surprisingly well- I mean all things considered. He just keeps saying we just have to wait and see. 5:14 PM

Robert

Were you originally planning to bring him at 9:30? 5:14 PM

Robert

I can't remember what we said in letter 5:15 PM

Andrea Bond

Yes - he is staying with me for a few days. He wanted to get here and see where the office was before he signed a lease... 5:15 PM

Andrea Bond

He's looking for the letter to see 5:15 PM

Andrea Bond

I mean we told Steve 9:30- I figured it would be the same for him. He just looked at the letter- he was never told a start time

5:16 PM

Robert

I'm using that time

5:17 PM

Robert

No problem

5:17 PM

Andrea Bond

So yes, 9:30- but we will drive separate because we don't know each other

5:17 PM

Robert

Ok cool

5:17 PM

Robert

Ahhhh just so you know, they may have access to all of our emails

5:19 PM

Andrea Bond

I'm sure that they do

5:19 PM

Peter 'Phong' Nguyen JD

I figured.

5:19 PM

Andrea Bond

I have nothing to worry about whatsoever though

5:20 PM

Robert

and Andrea I believe I those emails it indicates knowledge

5:20 PM

Robert

Ok

5:20 PM

Peter 'Phong' Nguyen JD

Same here.

5:20 PM

Andrea Bond

It indicates knowledge of what?

5:20 PM

Andrea Bond

He emails between Chad and I were subsequent to me scheduling his interview and requesting the certifications that Cherie and Javier needed to place him correctly with a salary

5:21 PM

Robert

Oh ok

5:21 PM

Andrea Bond

No chit chat so to speak between us

5:21 PM

Andrea Bond

I have emails to/from the other candidates also- it's nothing to worry over

5:22 PM

Robert

Good

5:22 PM

Andrea Bond

I was born at night- not last night 🤪

5:23 PM

Robert

lol

5:23 PM

Andrea Bond

This too shall pass guys- #next

5:24 PM

Peter 'Phong' Nguyen JD



5:27 PM

Robert

Ahhh ok Andrea they are Asking for his name and contact info...

5:45 PM

Peter 'Phong' Nguyen JD

What to make of that?

5:45 PM

Andrea Bond

I'm afraid they are going to rescind the offer...

5:46 PM

Andrea Bond

He has no ties here and therefore they see it as no real loss and not really damaging to cut it now

5:46 PM

Andrea Bond

Very corporate mentality

5:46 PM

Peter 'Phong' Nguyen JD

I think he would be entitled to damages, based on the principle of detrimental reliance.

5:47 PM

Robert

Yep

5:47 PM

Andrea Bond

So do you want me to forward his resume to you for formalities sake

5:47 PM

Robert

I'll probably wait until tomorrow I'm in middle of boarding and I don't have it readily available

5:48 PM

Andrea Bond

Okay cool. Just let me know what to do. I'll wait to hear from you before forwarding it...

5:49 PM

Robert

I have to give her tomorrow

5:56 PM

Andrea Bond

Ok

5:57 PM

Saturday, April 29, 2017

Andrea Bond

They pushed Chads start date to Wed. at 10a

10 13 AM

Andrea Bond

They ax if he was already in Vegas

10 15 AM

Robert

Good

10 15 AM

Robert

I think if he wasn't here they would say don't come

10:16 AM

Andrea Bond

Yeah probably

10 17 AM

Sunday, April 30, 2017

Peter 'Phong' Nguyen JD

Robert, any news?

12 39 PM

Robert
 They sent another email - 11:00AM mtg not 10:00, they also changed Andrea email password 12:40 PM

Peter 'Phong' Nguyen JD
 I wonder why? 12:41 PM

Andrea Bond
 Debbie and Lanita still have access and so does Robert. It's just me... 12:41 PM

Andrea Bond
 LuRell just called asking a bunch of questions about points of contacts respective to each shop. I gave her names and played nice. She kept asking me how to spell names- I was like yeah I can check my email if you like- she was like no no- that's fine... 1 52 PM

Robert
 lol check my email...don't cut my email if u still need my help!!! 2:14 PM

Andrea Bond
 She's the dumb one I told you about yesterday 2:15 PM

Robert
 I've spoken with her - I think she's their assistant 2:16 PM

Andrea Bond
 I expect more from support staff 2:16 PM

Peter 'Phong' Nguyen JD
 Yikes. 2:17 PM

Andrea Bond
 Kthxbai - see ya tomorrow... 2:18 PM

Andrea Bond
 Thats how it ended 2:18 PM

Andrea Bond
 She's their attorney 2:20 PM

Andrea Bond
 Bahhaa- you thought she was an assist 2:21 PM

Andrea Bond
 Sorry speaks to quality 2:21 PM

Robert

What???? Are u sure?

2:21 PM

Robert

These people are FUCKING KILLING ME - using work phones!

2:38 PM

Andrea Bond

She sounds like an assistant. Debbie is certain she's an attorney...idk....

2:38 PM

my convo reminded her apparently- she just text messaged me the new email password and see the new time for tomorrow meeting...

Andrea Bond

I know- they all have my personal

2:38 PM

Andrea Bond

I've told them

2:39 PM

Peter 'Phong' Nguyen JD

Are they crazy?

2:48 PM

Robert

I would t be surprised if they ask for phones & PIN on Monday

2:50 PM

Andrea Bond

I'm sure they will. They are reading all emails now so...

2:51 PM

Robert

And they are working 24/7

2:51 PM

Andrea Bond

Yeah they are

2:51 PM

Andrea Bond

The office isFULL of people right now

2:52 PM

Andrea Bond

I downloaded and deleted he slides. It showed in my email from my computer as unread (along with all other emails since I last checked it Friday night) So I am sure the slides are safe.

3:04 PM

Robert
Did u delete trash folder??? 3:05 PM

Andrea Bond
My email is set up complicated for people who aren't familiar with google 3:05 PM

Andrea Bond
Yes I emptied trash as well after I put it in there 3:05 PM

Andrea Bond
LuRell is Managing Counsel - that's her title - 3:17 PM

Robert
lol lol the shit never stops! 3:17 PM

Robert
Peter one day I'm gonna thank u for this comedy...u really can't write this shit - did she go to UNLV law? 3:18 PM

Andrea Bond
That's exactly what I was thinking!! Omg Robert you are rubbing off on me- scary!! 😬 3:19 PM

Peter 'Phong' Nguyen JD
Haha 3:24 PM

Robert
these moments are what life is about 3:27 PM

Peter 'Phong' Nguyen JD
Nice attitude! 3:28 PM

Andrea Bond
She's still texting me asking for people's contact info. #annoying 3 39 PM

Robert
On Sunday! 3 39 PM

Peter 'Phong' Nguyen JD
 3:40 PM

Andrea Bond



I have already talked and texted with her a bit. I finally told her I'm out with family....

3:41 PM

Robert

FUCK CSI

3:42 PM

Chat with Peter 'Phong' Nguyen JD

4/27/2017 11:45:06 PM - 4/28/2017 10:28:51 AM

Export Details:

Device Phone Number (202) 549-1570

Device Name WxYz

Device ID 3a0d3197f35bd47d1abda03a35d755f5e6fa7f7b

Backup Date Sunday, April 30, 2017 11:16 PM

Backup Directory C:\Users\User\AppData\Roaming\Apple Computer\MobileSync\Backup\3a0d3197f35bd47d1abda03a35d755f5e6fa

iOS 10.3.1

Current Time Zone (UTC-08:00) Pacific Time (US & Canada)

Created with iExplorer v4.2.6.0

Participants:

+1 310-774-7777, Peter 'Phong' Nguyen JD

Thursday, April 27, 2017
Peter 'Phong' Nguyen JD 1:43 PM
Anything new?

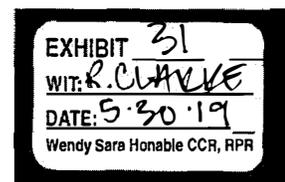
Friday, April 28, 2017
Peter 'Phong' Nguyen JD 2:28 AM
???

Robert
Pastina wake up 4:17 AM

Robert
(No news today - Steve Ury said that Sheila is still Treasurer, basically the board voted to go into Trusteeship and now Mary Kay had to decide if she will "accept" their request, so the at-large officers still exist for now.) 2:50 AM

Peter 'Phong' Nguyen JD 2:56 AM
Interesting...

Peter 'Phong' Nguyen JD 3:07 AM
It would be nice to have a clean slate with no Shiela or Clara.



Robert

Yeah I think it's a formality - once trusteeed I'm guessing they're gone???

1:01 AM

Peter 'Phong' Nguyen JD



6:18 AM

Robert

Just received a call from Intl - everyone should be getting a call - stating that today Mary Kay decided to place 1107 into trusteeship and that we are all on paid leave for today.

8:05 AM

Peter 'Phong' Nguyen JD

Interesting...why 1 day?

8:12 AM

Peter 'Phong' Nguyen JD

Is it just some sort of a cleansing or clean break period?

8:13 AM

Robert

No clue

8:18 AM

Robert

Doesn't make sense

8:18 AM

Peter 'Phong' Nguyen JD

Have they asked you for IT control?

8:19 AM

Robert

No not yet

8:22 AM

Robert

Is that normal next step?

8:22 AM

Peter 'Phong' Nguyen JD

We will have a front seat to this process which might help with the consulting business.

8:22 AM

Robert

lol I guess so

8:22 AM

Robert

They are speaking with me now - they want some IT password...

8:55 AM

Robert
Be careful - Dana is using union phone to text - I spoke with her so don't text her about it 9:58 AM

Robert
She transferred her personal number to the union phone 8:56 AM

Robert
Read your work email: "...If you have written documentation of a pre-approved leave or vacation and will be unable to report for the meeting, we need to hear from you immediately. You may phone SEIU Nevada's office at (702) 386-8849 to get instructions on how to submit the documentation..." 9:10 AM

Peter 'Phong' Nguyen JD
Told ya... 9:10 AM

Robert
They wanna know what we do 9:10 AM

Robert
to determine if we're needed 9:11 AM

Peter 'Phong' Nguyen JD
How can I submit a document that I do not possess? 9:36 AM

Peter 'Phong' Nguyen JD
I thought staff were not supposed to be affected by the trusteeship? 9:36 AM

Robert
They plan to discuss our duties one by one to see what we do - if u can't be there Monday then they want u to do what the email states 9:38 AM

Robert
If they get ahold of Dana's texts then probably all of us on the texts are OUT 9:39 AM

Peter 'Phong' Nguyen JD
Tell her to delete them! 9:41 AM

Peter 'Phong' Nguyen JD
She probably needs to do a clean reset. 9:43 AM

Robert

I told her - she doesn't seem to quite understand...thinks that she hasn't said anything bad

10:01 AM

Peter 'Phong' Nguyen JD

Impress upon her that things can be misconstrued against her/us...just look at what happened to Cherie!

10:25 AM

Robert

If u can FaceTime FaceTime me

10:28 AM

Chat with Peter, Andrea, LaNita, Cherie & +1 702-937-9297

4/30/2017 2:49:03 PM - 4/30/2017 5:58:21 PM

Export Details:

Device Phone Number (202) 549-1570

Device Name WxYz

Device ID 3a0d3197f35bd47d1abda03a35d755f5e6fa7f7b

Backup Date Sunday, April 30, 2017 11:16 PM

Backup Directory C:\Users\User\AppData\Roaming\Apple Computer\MobileSync\Backup\3a0d3197f35bd47d1abda03a35d755f5e6fa

iOS 10.3.1

Current Time Zone (UTC-08:00) Pacific Time (US & Canada)

Created with iExplorer v4.2.6.0

Participants:

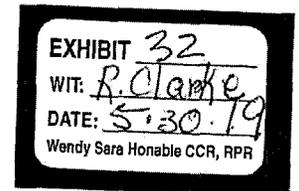
+1 310-774-7777, Peter 'Phong' Nguyen JD

+1 678-777-4570, Andrea Bond

+1 702-738-3968, LaNita Troyano

+1 702-321-9388, Cherie Mancini

+1 702-937-9297



Su 1a April 30, 20 7

Andrea Bond

Making sure everyone has my personal number...make sure this is the contact that's saved for group texts. Thanks.

3 PM

Peter 'Phong' Nguyen JD

This thread is all personal numbers, right?

2:50 PM

Andrea Bond

Yes it is- I left Dana off because I don't have a separate number for her

5:00 PM

Andrea Bond

Separate, personal that is..

2:01 PM

Peter 'Phong' Nguyen JD
 **Confirmed. We shall use this thread from now on.** 2:54 PM

Andrea Bond
 **Lanita- you are calling Dana to stop texting from work phone- yes?** 3:03 PM

+1 702-937-9297
 **I am really worried about our jobs but we have to wait and see** 3:06 PM

Peter 'Phong' Nguyen JD
 **I thought they told leadership staff would not be affected.** 3:08 PM

Robert
 3:08 PM

Peter 'Phong' Nguyen JD
  3:09 PM

LaNita Troyano
 **I was told this is standard protocol.. Dana only has a work phone..** 3:09 PM

Peter 'Phong' Nguyen JD
 **I just got an email saying that they want to meet with me at 9 AM on May 10 when I return from vacation. I flagged for them that I was scheduled to lead Clark County bargaining from 8 AM to 5 PM that day. We shall see how they respond.** 4:28 PM

LaNita Troyano
 **So we were all told to be there tomorrow at 11. Except Peter right?** 5:46 PM

+1 702-937-9297
 **Yes** 5:58 PM



SEIU Nevada Local 1107
2250 S. Rancho Drive, Suite 165
Las Vegas, NV 89102
Phone (702) 386-8849

May 4, 2017

HAND DELIVERED

To: Robert Clarke

Dear Mr. Clarke:

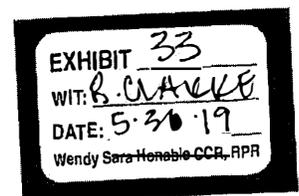
As you know, Local 1107 has been placed under trusteeship by the Service Employees International Union. The Trustees of Local 1107 have been charged with the restoration of democratic procedures of Local 1107. In connection with formulating a program and implementing policies that will achieve this goal, going forward the Trustees will fill management and other positions at the Local with individuals they are confident can and will carry out the Local's new program and policies. In the interim, the Trustees will largely be managing the Local themselves with input from member leaders.

For these reasons, the Trustees have decided to terminate your employment with Local 1107, effective immediately. You are hereby directed to immediately return any property of the Local that you have in your possession, including but not limited to credit cards, phones, keys or key cards, vehicles, computers, files (both electronic and hard copy) and any other property in your possession.

Sincerely,

A handwritten signature in black ink, appearing to read "Manteca".

Martin Manteca
Deputy Trustee, SEIU Local 1107



Gentry-Clarke000009

CERTIFICATE OF SERVICE

Clarke v. Service Employees International Union, et al.

Supreme Court No. 80520 and 81166

Case No. A-17-764942-C

I hereby certify that on this date 7th day of October, 2020, I submitted the foregoing **APPENDIX OF SERVICE EMPLOYEES INTERNATIONAL UNION AND CLARK COUNTY PUBLIC EMPLOYEES ASSOCIATION A/K/A SEIU LOCAL 1107, VOLUME 3** for filing and service through the Court's eFlex electronic filing service. According to the system, electronic notification will automatically be sent to the following:

Michael J. Mcavoyamaya 4539 Paseo Del Ray Las Vegas, NV 89121 Tel: (702) 685-0879 Email: Mmcavoyamayalaw@gmail.com	Evan L. James Christensen James & Martin 7440 W. Sahara Avenue Las Vegas, NV 89117 Tel: (702) 255-1718 Fax: (702) 255-0871 Email: elj@cjmlv.com
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/s/ Jonathan Cohen

Jonathan Cohen