

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3  
4 DENNIS HOF, an individual; )  
5 CHERRY PATCH LLC, a Nevada )  
6 limited liability company, )  
7 Plaintiffs, )

CERTIFIED COPY

8 vs. )

) Case No.  
) 2:18-cv-01492-GMN-NJK

9 NYE COUNTY; NYE COUNTY BOARD OF )  
10 COUNTY COMMISSIONERS; DAN )  
11 SCHINHOFEN (in his personal and )  
12 official capacity as an employee) )  
13 of Nye County); ANDREW BORASKY )  
14 (in his personal and official )  
15 capacity as Commissioner of )  
16 District 4 of Nye County); )  
17 JANE DOE; and JOHN ROE, )  
18 Defendants. )

19 DEPOSITION OF PERSON MOST KNOWLEDGEABLE, CALLIE STARK

20 Taken at the Offices of the Board of County Commissioners

21 2100 Walt Williams Drive, Suite 100

22 Pahrump, Nevada

23 On Tuesday, August 21, 2018

24 At 2:52 p.m.

25 Reported by: Deborah Ann Hines, CCR #473, RPR

<p>1 Appearances:                  2 For the Plaintiffs:                  3 MARC J. RANDAZZA, ESQ.                  - and -                  4 LATEIGRA C. CAHILL, Esq.                  Randazza Legal Group                  5 2764 Lake Sahara Drive                  Suite 109                  6 Las Vegas, NV 89117                  (702)420-2001                  7 ecf@randazza.com                  8                  For the Defendants:                  9                  REBECCA BRUCH, ESQ.                  10 Erickson, Thorpe &amp; Swainston                  99 W. Arroyo Street                  11 Reno, NV 89509                  (775)786-3930                  12 rbruch@etsreno.com                  13                  14                  15                  16                  17                  18                  19                  20                  21                  22                  23                  24                  25</p>	<p>Page 2</p>	<p>1 (Prior to the commencement of the deposition                  2 proceedings, a discussion was held off the                  3 record among the reporter and counsel                  4 wherein counsel stipulated to waive the                  5 reporter requirements under Rule 30(b)(5).)                  6 Thereupon--                  7 CALLIE STARK                  8 was called as a witness by the Plaintiffs, and having                  9 been first duly sworn, testified as follows:                  10 EXAMINATION                  11 BY MS. CAHILL:                  12 Q. My name is LaTeigra Cahill. I'm an attorney                  13 with Randazza Legal Group. I represent the plaintiff                  14 Dennis Hof and Cherry Patch in this case. Sitting                  15 next to me is Marc Randazza. He's also an attorney                  16 representing Dennis Hof.                  17 Would you go ahead and state your name for                  18 the record.                  19 A. It's Callie Stark.                  20 Q. Callie Stark.                  21 MS. BRUCH: So, LaTeigra, before we move                  22 forward, what I would like to do is make a record of                  23 what it is that I provided to you, so if you're okay                  24 with that.                  25 MS. CAHILL: Thank you. Go ahead.</p>	<p>Page 4</p>
<p>1 WITNESS                  2 CALLIE STARK                  3 Examination By Ms. Cahill                  4 Examination By Mr. Randazza                  5 Further Examination By Ms. Cahill                  6 Examination By Ms. Bruch                  7 Further Examination By Mr. Randazza                  8                  9                  10                  11                  12 EXHIBITS                  13                  14 NUMBER DESCRIPTION PAGE                  15 Plaintiff's                  16 A Letter Dated 8-17-18 18                  17 B Renewal Notice 47                  18 C Nye County Agenda Information Form 56                  19 D Love Ranch Documents 62                  20 E Copy of Checks 67                  21 F Chicken Ranch Documents 89                  22 G Sheri's Documents 91                  23 H Alien Cathouse Documents 91                  24 I Copy of Checks 92                  25</p>	<p>Page 3 PAGE</p>	<p>1 MS. BRUCH: Okay. So this morning as I was                  2 on the plane backing away, I got -- I saw the court                  3 order for this. And Callie lives in Tonopah, which                  4 is, what, two hours, two and a half hours away. She                  5 had already left this morning when I forwarded this                  6 to her so she had a heads up about it.                  7 What we provided to you is, I'd like to just                  8 go through it real quick to make a record of what                  9 they are so that we just, you know, if we need to                  10 talk to the judge about it.                  11 MS. CAHILL: It is my intention to go                  12 through everything --                  13 MS. BRUCH: Okay.                  14 MS. CAHILL: -- during the deposition, so                  15 maybe you can, if there's something that you think I                  16 missed, you can bring that up on cross.                  17 MS. BRUCH: Okay. Yeah, just if you'll make                  18 it real clear because I want to distinguish between                  19 what you were given that we --                  20 MS. CAHILL: Yes.                  21 MS. BRUCH: -- sent you as a result of the                  22 public records request and now pursuant to the court                  23 order what we've provided.                  24 MS. CAHILL: Absolutely. I know that you                  25 probably don't want to run too late, but it is my</p>	<p>Page 5</p>

Page 6

1 intention to go through what you guys provided, at  
 2 least on --  
 3 MS. BRUCH: Sure.  
 4 MS. CAHILL: -- a short-term basis.  
 5 MS. BRUCH: Okay.  
 6 BY MR. RANDAZZA:  
 7 Q. Okay. Great.  
 8 I just want to give you -- is this the first  
 9 time that you've ever done a deposition?  
 10 A. In a long time. I've done one before, but  
 11 it was 20 years ago.  
 12 Q. Okay. Well, I'll just walk you through some  
 13 basics. So if there's any reason why you can't give  
 14 full and complete -- is there any reason why you  
 15 can't give full and complete and accurate testimony  
 16 today?  
 17 A. No.  
 18 Q. No? We ask that question just in case,  
 19 like, you didn't take sleeping pills last night or,  
 20 you know...  
 21 A. No.  
 22 Q. Just want to make sure that you're here and  
 23 cognizant.  
 24 Okay. And so I'm going to go through and  
 25 ask you some questions mostly about some of the

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1 documents that you guys have provided to us but also  
 2 some documents that we have already. If I ask you  
 3 any questions that you don't know the answer to,  
 4 don't try to guess. Just say that you don't know.  
 5 That's completely fine.  
 6 Please answer in yes or no format, because  
 7 it's easier for the court reporter, so don't nod your  
 8 head or say "uh-huh." Yes or no or you don't know is  
 9 probably the best way to go.  
 10 Is there -- do you have any questions so  
 11 far?  
 12 A. No.  
 13 Q. Okay. And if there's a question that I ask  
 14 you that you don't understand, just tell me that you  
 15 don't understand my question and I'll think of a  
 16 different way to say it.  
 17 A. Okay.  
 18 Q. Okay. So let's start from the beginning.  
 19 How long have you worked for Nye County?  
 20 A. A month short of 17 years.  
 21 Q. A month short of 17 years. And what was  
 22 your position when you started?  
 23 A. Dispatcher.  
 24 Q. What does a dispatcher do?  
 25 A. Take 911 calls, help the public.

Page 8

1 Q. So a 911 dispatcher?  
 2 A. Yeah.  
 3 Q. And how long did you do that?  
 4 A. It would have to be four years.  
 5 Q. Okay. What did you do after you were a 911  
 6 dispatcher with the county?  
 7 A. Admin tech for the sheriff's office.  
 8 Q. And what is an admin tech?  
 9 A. So do you want my, like my whole job  
 10 description or what? I mean, it's clerical. It's a  
 11 little bit of everything, short of cleaning toilets.  
 12 Q. Okay. So you did clerical work for the  
 13 sheriff? Is that kind of a fair synopsis?  
 14 A. Yeah.  
 15 Q. So what would your typical day-to-day job be  
 16 like in that role?  
 17 A. Well, we had to do everything with the  
 18 public. We had to do fingerprints, concealed weapon  
 19 permits, work cards. I did the banking. I did the  
 20 licensing. I did, gosh, a majority of stuff. Tons  
 21 of it.  
 22 Q. Okay. And how long did you work in that  
 23 role?  
 24 A. Going to be -- I kind of switched roles  
 25 through the middle, so we're going to go -- I don't

Page 9

1 even know the dates actually.  
 2 Q. That's okay.  
 3 A. I was an Admin Tech I and an Admin Tech II  
 4 where I took on a little more responsibility, but I  
 5 don't know what the dates were of that. We did  
 6 basically the same thing, I was just able to oversee  
 7 other people if I needed to be their boss type of  
 8 thing.  
 9 Q. Okay.  
 10 A. But it would be the rest of my career  
 11 there --  
 12 Q. Okay.  
 13 A. -- for the 17 years I was an Admin Tech I  
 14 and an Admin Tech II.  
 15 Q. Which admin tech are you now?  
 16 A. II.  
 17 Q. II. And so the Admin Tech II is more of a  
 18 supervisory role?  
 19 A. Yes.  
 20 Q. But the job hasn't changed too much?  
 21 A. Right.  
 22 Q. Okay. So what is your job like on a  
 23 day-to-day basis now?  
 24 A. I'm not sure I understand that question.  
 25 Q. On a typical workday, would you say that you

Page 10

1 spend -- you get there at 9:00 and you spend some  
 2 time opening emails or going through Excel sheets?  
 3 Like, if you just had to give me a picture of what  
 4 your typical day was like, or is it just so different  
 5 every day?  
 6 A. It's different. I mean, you go through the  
 7 same thing, but it just depends on what comes in,  
 8 comes on. A lot of it depends on the public as  
 9 well --  
 10 Q. Okay.  
 11 A. -- you know, what we're doing through the  
 12 day. But every day you do emails, you do phone  
 13 calls, you do all your general stuff every day, and  
 14 then depending on what the public brings in to you.  
 15 Q. Okay. So you say it depends on what comes  
 16 in. So would you describe your job as more reactive  
 17 or would you describe your job as it's a very planned  
 18 out and I know pretty much what I'm going to be doing  
 19 every day or are you --  
 20 A. Definitely not planned.  
 21 Q. Not planned?  
 22 A. Huh-uh.  
 23 Q. Okay. So you're responding to what's  
 24 happening that day, what the public brings in to you?  
 25 A. Yeah.

Page 11

1 Q. So it sounds like you're reacting to a lot  
 2 of emergencies; is it fair to characterize it that  
 3 way?  
 4 A. Not emergencies, just depending on what the  
 5 public needs for the day.  
 6 Q. So you'll have to forgive me, I've never  
 7 worked for government. What type of thing would the  
 8 public need for the day?  
 9 A. Fingerprints.  
 10 Q. Fingerprints, okay.  
 11 A. Work cards.  
 12 Q. Uh-huh.  
 13 A. Concealed weapon permits, sex offender  
 14 registries, brothel workers.  
 15 Q. Okay.  
 16 A. Records requests.  
 17 Q. Okay.  
 18 A. General information.  
 19 Q. And are you in charge of all the records  
 20 requests here for the county?  
 21 A. I don't do them all, but I oversee them all.  
 22 Q. Okay.  
 23 A. I have a coworker that has been there for a  
 24 year and she's the one that's doing most of the  
 25 record requests.

Page 12

1 Q. Okay.  
 2 A. I do more of the subpoena side as custodian  
 3 of records.  
 4 Q. Okay. You said that you often deal with  
 5 some of the brothel workers, their needs of the day.  
 6 Could you tell what that would typically look like?  
 7 A. Brothel workers themselves go through our  
 8 Pahrump office.  
 9 Q. Okay.  
 10 A. So unless there's questions on them, I don't  
 11 deal with them in particular, just questions from the  
 12 south.  
 13 Q. What office do you typically work in?  
 14 A. Tonopah.  
 15 Q. Tonopah?  
 16 A. Yeah. Our brothel closed down quite some  
 17 time ago in Tonopah, so...  
 18 Q. How long ago?  
 19 A. Way before my career.  
 20 Q. Okay. So as long as you've lived there --  
 21 A. Yes.  
 22 Q. -- there hasn't been a brothel there?  
 23 So you said that sometimes you do deal with  
 24 sex workers who come in. Do you sometimes work in  
 25 the Pahrump office?

Page 13

1 A. Once in a while.  
 2 Q. Once in a while?  
 3 A. Usually when I'm working in the Pahrump  
 4 office, I'm working in an office, not with the actual  
 5 public down in Pahrump, just in one of the offices  
 6 with either my supervisor or one of the workers.  
 7 Q. So if you were working with the brothel  
 8 workers and you were working on the office side, what  
 9 does that mean?  
 10 A. They come in for work cards.  
 11 Q. Uh-huh.  
 12 A. So we'd have to do their work cards for  
 13 them, but I don't usually do the public in Pahrump,  
 14 so I don't produce the workers' cards.  
 15 Q. Okay. So somebody at the front desk would  
 16 do that. And since you have sort of a supervisory  
 17 role, would you review that work before the card was  
 18 produced?  
 19 A. About the only thing I do right now is the  
 20 money side of it. I take care of the banking.  
 21 Q. Okay. And you're referring to the actual  
 22 brothels, not working with the brothel workers?  
 23 A. As far as banking, I take care of that too,  
 24 the banking for the workers' cards.  
 25 Q. Could you tell me what that means?

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1 A. I have to provide monthly reports to the  
 2 treasurer at the end of the month with all of our  
 3 money and what accounts they need to go into. So  
 4 that's my part of it is getting all the information,  
 5 how much money was deposited for which -- for what it  
 6 was for.

7 Q. Okay.

8 A. And putting it where it needs to be.

9 Q. And is the treasurer your direct supervisor  
 10 or is this a report that you have to prepare for the  
 11 treasurer as part of your job?

12 A. Report that I have to prepare for the  
 13 treasurer.

14 Q. And do all of your financial reports go to  
 15 the treasurer or to other people?

16 A. To the treasurer.

17 Q. Okay. And who's the treasurer?

18 A. Right now it's Pam Webster.

19 Q. So dealing only with the brothel workers and  
 20 not the brothels, just only because you brought it  
 21 up, so you said on a typical day a brothel worker  
 22 might come in, you wouldn't necessarily deal with the  
 23 brothel worker at the window, but you would deal with  
 24 the financial side, you would look at what money was  
 25 deposited and then prepare a report for the

Page 15

1 treasurer. Did I summarize that pretty accurately or  
 2 did I miss something?

3 A. Did you say daily or monthly? We do a  
 4 report monthly.

5 Q. Well, I meant on a typical day if you were  
 6 dealing with a brothel worker, but, yes, so you said  
 7 your reports were monthly?

8 A. Yeah.

9 Q. What else goes into your monthly reports?

10 A. All money collected would be for anything.

11 Q. Okay.

12 A. It would be any money collected at all  
 13 through the front offices.

14 Q. And how many people at the front office deal  
 15 with collecting money?

16 A. There's probably three or four in the  
 17 Pahrump office, and then just myself and my coworker  
 18 in the northern office.

19 Q. Okay. But you said that you don't ever  
 20 collect money, it's the people at the front desk, you  
 21 just handle the accounting; is that correct?

22 A. No. If I'm there by myself, I collect the  
 23 money.

24 Q. Okay.

25 A. If I do fingerprints and work cards, they've

Page 16

1 got to pay me. I'm the only one there if my coworker  
 2 is gone.

3 Q. It's a small town. I understand.

4 Okay. So you said your monthly reports,  
 5 it's any money that comes in from the public. So it  
 6 could be for fingerprints, brothel workers, people  
 7 who come in and need to register as a sex offender,  
 8 those are the examples that popped into your mind.

9 It sounds like those are the most common. And then  
 10 you also deal with the accounting for the brothels;  
 11 is that correct?

12 A. That's some of them. I mean, I do liquor, I  
 13 do gaming --

14 Q. Okay.

15 A. -- money. I'm trying to think what else  
 16 there is. I'm sure there's a lot more. Concealed  
 17 weapon permits.

18 Q. Okay. When did you start doing the  
 19 accounting for the brothels?

20 A. I took over the licensing side in 2010.

21 Q. And when you say you took over the licensing  
 22 side in 2010, does that mean that you did accounting  
 23 for a different aspect of the brothels before that?

24 A. No. I had nothing to do with it before  
 25 that.

Page 17

1 Q. Okay. And who would you say is your direct  
 2 supervisor, or do you answer to several different  
 3 people depending on what type of work you're doing?

4 A. I have a direct supervisor.

5 Q. Okay.

6 A. Her name is Janice Maurizio --

7 Q. Okay.

8 A. -- in the Pahrump office.

9 Q. So when you prepare these monthly reports,  
 10 you turn them in to both the treasurer and to Janice?

11 A. Just the treasurer.

12 Q. Just the treasurer?

13 A. Yeah. And they get receipts. They get  
 14 copies of receipts from the treasurer's office of  
 15 what was turned in.

16 Q. So you give it to the treasurer, and then  
 17 the treasurer's office gives it to Janice, your  
 18 supervisor?

19 A. She emails us a copy of the receipt, all of  
 20 us.

21 Q. Who's "she"?

22 A. The treasurer.

23 Q. And then Janice would be CC'd on that email,  
 24 or does she email it to Janice and you're included?

25 A. I know I get it, and I know the sheriff

Page 18

1 does. I'm not for positive whether Janice is on  
 2 there or not. I think she is but I'd have to go back  
 3 and look.

4 Q. Okay. But you know the sheriff is --  
 5 A. Yeah.

6 Q. -- on those emails, and the sheriff looks at  
 7 those receipts every month?  
 8 A. I can't answer that for you.

9 Q. But you know that she gets the emails every  
 10 month?  
 11 A. Yeah. Yes, I know.

12 Q. Sure, you can't answer if she actually reads  
 13 her emails?  
 14 A. No.

15 Q. Okay. So when you are preparing your  
 16 reports, are you only preparing how much money has  
 17 been collected or are you at all familiar with -- how  
 18 do I phrase this? Do you make any sort of an  
 19 analysis when you review the reports for the money  
 20 that comes in?  
 21 So you're doing your report on the brothel  
 22 licensing that month, and you see that X amount of  
 23 dollars has come in, do you have to also submit some  
 24 sort of an analysis to your supervisor, to the  
 25 treasurer that says "this isn't the correct amount of

Page 19

1 money," or do you make any sort of analysis or do you  
 2 just input the numbers and send it off?  
 3 A. No, no analysis. Just what we've actually  
 4 received.

5 Q. Okay. So let's go ahead and go through some  
 6 of the paperwork that we have. And I will, at  
 7 Ms. Bruch's request, start off with the paperwork  
 8 that we already had, and then I'll make it clear when  
 9 we're switching over to what's been produced, if that  
 10 works for everybody.

11 MS. BRUCH: Sure.  
 12 THE WITNESS: Okay.

13 MS. BRUCH: And you're talking about the  
 14 records that we provided, I think that Callie sent in  
 15 response to the public records request initially,  
 16 correct?  
 17 MS. CAHILL: Well...  
 18 MS. BRUCH: That first batch that she sent  
 19 you was I think in response to the public records  
 20 request.  
 21 MS. CAHILL: We can look at that letter now.  
 22 Let's start off with that letter. So this is already  
 23 an exhibit, however we will go ahead and mark it as  
 24 an exhibit for the deposition. So we're going to  
 25 mark this as Plaintiffs' Exhibit A.

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1 (Thereupon Plaintiffs' Exhibit A  
 2 was marked for identification.)  
 3 BY MS. CAHILL:  
 4 Q. And I'm handing to your attorney a copy of a  
 5 letter that we received from you dated August 17th.  
 6 Do you recognize this letter?  
 7 A. Yes.  
 8 Q. So I take it that you received a copy of the  
 9 public records request that we sent in; is that  
 10 correct?  
 11 A. Yes.  
 12 Q. And is this letter a response to that public  
 13 records request that we sent in?  
 14 A. Yes.  
 15 Q. Okay. Did you talk to -- well, we'll leave  
 16 it at that.  
 17 You say in your letter that you enclosed  
 18 copies of your department records pertaining to the  
 19 brothel licenses. And I have a copy of the records  
 20 that were attached, and I will include that as part  
 21 of Exhibit A.  
 22 So is it fair to say that these charts that  
 23 were attached to your letter, these charts were in  
 24 response to the public records request?  
 25 A. Yes.

Page 21

1 Q. Okay. In your letter you say that your  
 2 licensing system generates everything. Could you  
 3 explain to me what you mean by "your licensing system  
 4 generates"?  
 5 A. We use a licensing module out of Eden, is  
 6 the name of the company.  
 7 Q. Okay.  
 8 A. So it does automatic generation of the  
 9 renewals and such. So, like, the stuff that's put in  
 10 the system, we can't change. It automatically prints  
 11 out what like the first day of the quarter is, like  
 12 that letter states.

13 Q. So would you say that you -- so you enter  
 14 your software system and you pulled up a report  
 15 essentially, or did the -- did the system, because it  
 16 says "our licensing system generates everything," did  
 17 the licensing system generate this automatically or  
 18 did you plug in and pull a report from the system?  
 19 A. Are you asking about these?  
 20 Q. I'm asking about the licensing system. So  
 21 you said it's a software called Eden.  
 22 A. So the letter that was provided was an  
 23 answer to questions on the records request.  
 24 Q. Uh-huh.  
 25 A. These are the reports. This is the answers



Page 22

1 to what we couldn't provide.

2 Q. Okay. So these are the reports from Eden then?

3 A. Yes.

4 Q. Okay. And this letter, are these reports

5 also in response to the public records request?

6 A. Yes.

7 Q. Okay. So if a member of the public has

8 requested this exact same thing, this is what you

9 would have provided to the member of the public?

10 A. Yes.

11 Q. Were you aware of the litigation at the time

12 that you generated this report?

13 A. Hearsay. I would have been just listening

14 to the sheriff.

15 Q. So people in your offices were talking about

16 it?

17 A. Uh-huh.

18 Q. But nobody had talked to you about it

19 basically?

20 A. Huh-uh.

21 MS. BRUCH: You need to say yes or no.

22 THE WITNESS: No. Sorry.

23 MS. BRUCH: That's okay.

24 BY MS. CAHILL:

25 Q. So it says that your licensing system

Page 23

1 generates everything using the first day of the

2 quarter that you were working in. So and just please

3 correct me if I'm wrong, if I'm misinterpreting your

4 letter here, when you say the first date of the

5 quarter that you were working in, are you referring

6 to the activity date --

7 A. Yes.

8 Q. -- on this chart?

9 A. Yes.

10 Q. Okay. So these are the dates that came from

11 the Eden software system?

12 A. Correct.

13 Q. Okay. And you said that you have no way of

14 editing these dates? This is just what comes out of

15 the system when you pull a report?

16 A. Yes.

17 Q. Okay.

18 MS. BRUCH: Just for the record, so we make

19 sure we're clear, what you're pointing to when you're

20 saying "this," you're talking about the page that's

21 got the Love Ranch, the Love Ranch information,

22 correct?

23 MS. CAHILL: Correct. However, I will

24 clarify that all of the reports have the activity

25 date in the same place.

Page 24

1 BY MS. CAHILL:

2 Q. In your letter you say that you do not have

3 a record of actual dates that you received the

4 brothel renewal payments. So is it your statement

5 that you don't have any sort of a record of when you

6 received brothel renewal payments?

7 A. Yes.

8 Q. Okay. So when you -- when the brothel

9 renewal payments come in to your office, you're the

10 one that does all the -- inputs all the records?

11 There's nowhere else where you keep notes? There's

12 no Excel sheet that you keep where you keep any sort

13 of data on when you collect the money that comes in?

14 A. No, nothing else.

15 Q. Okay.

16 A. Goes right into our licensing module.

17 Q. And it's called Eden software, right?

18 A. Uh-huh.

19 Q. Okay. So you say that the renewal -- we're

20 just moving through your letter. So whenever you

21 input it into the Eden software, the activity date,

22 am I correct that saying that this activity date is

23 the quarter that you are in or is it referring to the

24 next quarter? So if on 4-1-2017, which is the second

25 date from the top, did you enter this payment in

Page 25

1 before April 1st or after April 1st?

2 A. I couldn't answer that for you --

3 Q. Okay.

4 A. -- because I have no idea when we received

5 the payments.

6 Q. Well, how does the --

7 A. That's just the first day of the quarter.

8 Q. How does the Eden software translate those

9 dates? Like, where does this -- what does this date

10 mean?

11 A. It's just the first date of every quarter

12 where the licenses are due.

13 Q. So the way that the -- so the way that the

14 system is programmed is if you entered it in before

15 April 1st, 2017, it would come up April 1st, 2017.

16 But if you entered it after April 1st, 2017, it would

17 have that same date, or would it go to the next

18 quarter?

19 A. It would have the same date.

20 Q. Okay. So it's irrelevant when you enter it

21 in?

22 A. Yes.

23 Q. Okay. So somebody could have paid this six

24 months after April 1st and it would have still showed

25 April 1st as the activity date?

Page 26

1 A. Probably not six months after because your  
 2 quarter is only three months long, so then it's going  
 3 to go to the next quarter.

4 Q. Okay. So how does Eden, the software, which  
 5 probably has a pretty simple program, how does it  
 6 know which quarter that you're entering the payment  
 7 information for? Do you have to physically tell the  
 8 software system that this payment is being applied  
 9 toward the first quarter or do you have to physically  
 10 tell the software system to apply it to the next  
 11 quarter?

12 A. When you do renewals out of the system, you  
 13 put in your dates of what the next quarter is. It  
 14 automatically sets up the date of the activity date  
 15 of the next quarter.

16 Q. So you have to manually enter that  
 17 information?

18 A. During the renewal process, yes.

19 Q. During the renewal process?

20 A. Yes.

21 Q. Okay. So your next sentence you say that  
 22 "the renewal paperwork comes to us with the payment."  
 23 When you attached these reports to this letter, you  
 24 were not referring to these reports; is that correct?

25 A. Correct.

Page 27

1 Q. Okay. So what did you mean by "renewal  
 2 paperwork"?

3 A. I believe question number two on the records  
 4 request --

5 Q. Okay.

6 A. -- asked about renewal sheets, when we  
 7 received renewal paperwork. And then, like, the  
 8 third question was when we received renewal payment.

9 Q. Yes.

10 A. We receive them together, if they send them.  
 11 Sometimes they only send the checks.

12 Q. Okay. So sometimes they send checks and  
 13 sometimes they send renewal paperwork?

14 A. They don't always include the paperwork in  
 15 there.

16 Q. Okay. And do you alert your supervisor or  
 17 the treasurer or anybody when you receive a check or  
 18 when you receive a check and the renewal paperwork?

19 A. No.

20 Q. You only input the data on the checks?

21 A. I'm not sure what you mean.

22 Q. So if somebody sends you a check by itself,  
 23 you wouldn't put that data into the Eden software  
 24 system?

25 A. With just the check is what you're asking?

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1 Q. Uh-huh.

2 A. Yes.

3 Q. And if somebody sent you a check, and  
 4 whatever the renewal paperwork is, and hopefully  
 5 we'll get to that, what would you input into the  
 6 system? Would you input only the check number or  
 7 would you input they also submitted renewal  
 8 paperwork?

9 A. Just the check.

10 Q. Just the check.

11 A. It's the same.

12 Q. What do you mean by "it's the same"?

13 A. I mean, it doesn't matter whether they had  
 14 the renewal paper or not. I don't need it. I can  
 15 input it by the check.

16 Q. Who doesn't need it?

17 A. I don't.

18 Q. You don't. Does anybody need it?

19 A. No. Not in my department anyway.

20 Q. Where does that renewal paperwork go?

21 A. Right now as backup. If they -- if we have  
 22 it, it goes as backup with our banking.

23 Q. So you would submit a scanned copy of the  
 24 renewal paperwork to your bank?

25 A. No. We have it with our reports. Like my

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1 supervisor actually has all of the licensing files,  
 2 and she keeps all that stuff.

3 Q. Janice?

4 A. Uh-huh.

5 Q. And what do you mean by "she keeps all of  
 6 that stuff"?

7 A. They took the licensing away from me a year  
 8 ago.

9 Q. Okay. So in 2016 you were handling the  
 10 licensing?

11 A. Correct. And still currently today, even  
 12 though they took the stuff. They have me help now  
 13 instead of being the sole person.

14 Q. Okay. When you say that they took it away  
 15 from you, or did they -- would you -- did they take  
 16 it away from you because you had too much work?

17 A. I'm actually not sure what the reasoning is  
 18 on that.

19 Q. Okay. Did any supervisor ever give you any  
 20 kind of an explanation as to why they decided you  
 21 weren't going to be doing that type of work anymore?

22 A. No. It was thrown out a bunch of different  
 23 things, but no actual reasoning.

24 Q. What were just a couple of the different  
 25 reasons?



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1 A. One of them would probably be too much work.  
 2 Q. Okay.  
 3 A. One of them being the sheriff didn't like  
 4 the way I did them.  
 5 Q. Okay. What would you say your relationship  
 6 is like with the sheriff? Do you have a lot of  
 7 direct contact with her or is it mostly Janice?  
 8 A. Mostly Janice.  
 9 Q. Okay. And when Janice took over the  
 10 licensing, did she make any significant changes to  
 11 the way that was done?  
 12 A. You'd probably have to ask her on that. I'm  
 13 not for positive. I think she made some changes to  
 14 the application.  
 15 Q. Okay.  
 16 A. And I think the commissioners asked her to  
 17 make some changes, but I'm not for positive on that.  
 18 I wasn't part of that.  
 19 Q. So you were doing the licensing up until  
 20 2016, and when did you begin -- when did you start  
 21 doing the licensing? How many years did you do that?  
 22 A. Seven years.  
 23 Q. Seven years?  
 24 A. 2010 to 2017.  
 25 Q. So let's travel back in time a little bit,

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1 and could you tell me what you did when you were  
 2 running the licensing when it was your job? What was  
 3 that process like?  
 4 A. Well, we had two different licensing  
 5 systems.  
 6 Q. Okay.  
 7 A. So the first system obviously is different  
 8 than this one, but...  
 9 Q. So you had an old system --  
 10 A. Yeah.  
 11 Q. -- you mean?  
 12 A. Yeah.  
 13 Q. Okay. And then you improved and got a newer  
 14 software system?  
 15 A. Right.  
 16 Q. So what was the software system that you  
 17 used before?  
 18 A. It was called AS400.  
 19 Q. And is this a software system that a lot of  
 20 governments use or is it just an off-the-shelf like  
 21 you haven't -- you're not sure?  
 22 A. No, I have no idea.  
 23 Q. So this software system is where you used to  
 24 enter all the information for the licensing?  
 25 A. Correct.

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1 Q. And at the time you entered more information  
 2 than just the numbers off of the checks; is that  
 3 correct?  
 4 A. No.  
 5 Q. Okay. What did you enter when you used the  
 6 AS400? What type of information did you have to  
 7 enter into the system for the licensing renewals?  
 8 A. For the renewals we're just going to enter  
 9 like just the payments.  
 10 Q. Okay.  
 11 A. I mean, just put the payments in there.  
 12 Q. Only the payments?  
 13 A. Yeah.  
 14 Q. And would people still send renewal  
 15 paperwork at that time?  
 16 A. I can't remember.  
 17 Q. Okay. But if they did send renewal  
 18 paperwork, it was irrelevant to you? You would only  
 19 enter the payments?  
 20 A. Yes.  
 21 Q. Okay. Then you switched to the Eden  
 22 software, and what year was that?  
 23 A. Approximately sometime in 2011.  
 24 Q. So a while ago. And when you were entering  
 25 information for the license renewals into the Eden

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1 software, what did you enter into the system?  
 2 A. I'm not sure what you're asking. I mean,  
 3 there's different things that we enter into the  
 4 system, so what...  
 5 Q. Can you tell me what those things are,  
 6 because I've never worked in this type of a system so  
 7 I don't know.  
 8 A. Depends on what we're doing in the system.  
 9 Q. For the brothel renewals.  
 10 A. For renewals we're going to enter payments,  
 11 that's it.  
 12 Q. Okay. So the only thing you've ever entered  
 13 is payments, whether or not they made a payment and  
 14 what the amount was?  
 15 A. That's not the only thing I've entered. I  
 16 have to enter them in the system when they're brand  
 17 new brothels. We have to enter all their information  
 18 in there.  
 19 Q. Okay.  
 20 A. But for renewals we enter nothing but  
 21 payments.  
 22 Q. Okay. So when they're a new applicant, you  
 23 enter in all of the --  
 24 A. Addresses, people.  
 25 Q. Setting up their account essentially?

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1 A. Yeah.

2 Q. Okay. And then after that, all you enter

3 into the system is the payments?

4 A. Payment, uh-huh.

5 Q. Okay. And I'm assuming that if somebody

6 changes an address or something, you would also enter

7 that into the system?

8 A. Yeah.

9 Q. Okay.

10 MS. BRUCH: Can we take a break for just a

11 minute?

12 MS. CAHILL: Absolutely.

13 MS. BRUCH: Thanks.

14 (A recess was taken.)

15 BY MS. CAHILL:

16 Q. We can go back on the record.

17 So we will pick -- so just to clarify for

18 the record, the deponent and her counsel did take a

19 short break and we are back.

20 Just to pick back up where we left off, when

21 people would send you renewal forms and you entered

22 the amount of the check into the software system,

23 whether it was the AS400 or the Eden software system,

24 the renewal form, what happened with that form? You

25 said that you would keep it in a file or that Janice

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1 is the only one that kept it in a file?

2 A. So there's been variances.

3 Q. Okay.

4 A. And up until just recently we didn't keep

5 any of it.

6 Q. Okay. And when you say you didn't keep any

7 of it, do you mean that you shredded it?

8 A. Yes.

9 Q. Okay. And then in approximately what date

10 did Janice take over handling the licensing? In 2017

11 you said, but, like, around what time?

12 A. They took it away I'm going to say

13 approximately July.

14 Q. Okay.

15 A. But then it was all pretty much reverted

16 back to me, because they didn't know how to do any of

17 it, any of the entering and all of that. So I'm

18 helping now.

19 Q. Okay. But you're still doing it?

20 A. Yes. I believe they tried for one quarter

21 to figure it out and then I ended up --

22 Q. Okay.

23 A. -- doing it anyway.

24 Q. So you're still doing all the licensing,

25 just not formally, officially?

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1 A. Yes.

2 Q. Okay. And we'll just go back through your

3 letter just to keep it organized the way that we said

4 that we would keep it organized, but there are some

5 topics that I want to touch back on here.

6 So you said that the renewal paperwork comes

7 to you with a payment. And then you say you only

8 have an approximate date of when the renewal forms

9 were mailed to each brothel. So I'm going to turn

10 our attention back to the dates that you sent us.

11 And you previously said that the dates under

12 "activity date," which I am currently pointing to the

13 brothel license renewal form for Love Ranch, but this

14 also applies to the rest of them, to Chicken Ranch,

15 to Sheri's, the format is exactly the same. There's

16 an activity date with dates that are generated by the

17 Eden software, all of -- it looks like the name is

18 generated by the Eden software; is that correct?

19 A. Yes.

20 Q. And the description, is that also generated

21 by the Eden software?

22 A. Yes.

23 Q. The fee amount, you input that information

24 into the Eden software --

25 A. Yes.

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1 Q. -- is that correct?

2 And then when you generated this report,

3 that fee amount came up automatically?

4 A. Yes.

5 Q. Do you have any way of going in and changing

6 those fees amounts once you input it?

7 A. Yes.

8 Q. You do?

9 A. Yes.

10 Q. What types of situation would you do that?

11 A. When they have more brothel workers on the

12 floor, they have to pay different amounts.

13 Q. Okay. And are you able to change that

14 amount once the quarter is over? So this fee amount,

15 is this what they actually paid or is this what they

16 owed?

17 A. That's what they paid.

18 Q. That's what they paid?

19 A. Yes. I don't change it until they pay me,

20 because they're the ones that know how many workers

21 they have on the floor.

22 Q. So if you had a brothel that only paid half,

23 and then made another payment, the other half, but

24 made that payment say in the next quarter, would that

25 payment revert to the correct quarter or would you

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1 **have to correct that in the system?**  
 2 A. It doesn't allow half payments. It has to  
 3 be paid in full --  
 4 **Q. Okay.**  
 5 A. -- for however many workers they have. It  
 6 can change, I mean, depending on their workers, but  
 7 it has to be paid in full.  
 8 **Q. And how does the county know how much each**  
 9 **brothel has to pay?**  
 10 A. It's going to be based on what the brothel  
 11 actually pays us. We're relying on the brothel to  
 12 pay us what they owe. They change them themselves.  
 13 MS. BRUCH: The honor system.  
 14 BY MS. CAHILL:  
 15 **Q. What do you mean by that?**  
 16 A. There's a set fee --  
 17 **Q. Okay.**  
 18 A. -- for so many workers. So however many  
 19 workers they have, they provide us that amount.  
 20 **Q. But you know how many workers they have**  
 21 **because you said earlier that the people who worked**  
 22 **there come in to get licensed here --**  
 23 A. No.  
 24 **Q. -- is that correct?**  
 25 A. No.

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1 **Q. No?**  
 2 A. I have no idea.  
 3 **Q. You have no idea how many workers they have?**  
 4 A. I only work on the banking side, so I got a  
 5 total amount of money. That's all I have.  
 6 **Q. How do you know the total amount of money**  
 7 **then? The brothel owners tell you?**  
 8 A. I'm banking on the total amount of money  
 9 that we have.  
 10 **Q. Sorry, could you explain that? I don't**  
 11 **understand it.**  
 12 A. So right now the brothel workers all come  
 13 into Pahrump.  
 14 **Q. Uh-huh.**  
 15 A. So my supervisor handles the money down  
 16 there and provides me with a total amount for how  
 17 much money the brothel workers have paid.  
 18 **Q. Okay. So because you're in Tonopah, you're**  
 19 **relying on a coworker here to tell you how many**  
 20 **brothel workers came in and paid their licensing**  
 21 **fees. Is that -- do I have that correct?**  
 22 A. I'm not relying on anything because I'm just  
 23 doing the banking for how much money the sheriff's  
 24 office has received.  
 25 **Q. Okay.**

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1 A. I'm not spot checking how many brothel  
 2 workers are in the brothels. I have no control of  
 3 that.  
 4 **Q. So literally all you do is somebody hands**  
 5 **you a check for a thousand dollars and then you enter**  
 6 **that information; is that correct? The thousand**  
 7 **dollars I made up as an example, but they hand you a**  
 8 **check for an amount of money, you look at the check,**  
 9 **you enter what the amount is. Are those all the**  
 10 **steps?**  
 11 A. Are you still talking the brothel workers  
 12 though?  
 13 **Q. Let me clarify. I apologize. When you're**  
 14 **doing your job, when you're taking -- when you're**  
 15 **calculating the brothel renewal fees, all you do is**  
 16 **look at the check?**  
 17 A. So the brothel renewal fees are  
 18 automatically generated out of the Eden system.  
 19 **Q. Okay.**  
 20 A. They're going to be generated with the  
 21 amount that was for the previous quarter that they  
 22 paid. It's automatically going to revert to what  
 23 they paid from the quarter before.  
 24 **Q. Okay.**  
 25 A. Once the brothel -- once I got the check

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1 back, depending on what that check is, the amount of  
 2 that check is, that tells me how many they're paying  
 3 for.  
 4 **Q. Okay. So there's absolutely no connection**  
 5 **in your software system between how many brothel**  
 6 **workers come in to get licensed and how much the**  
 7 **brothel has to pay each quarter?**  
 8 A. Correct. There's nothing in there at all.  
 9 It's just strictly a licensing system for brothel,  
 10 liquor and gaming; brothel being the building, the  
 11 actual business.  
 12 **Q. Okay.**  
 13 A. Not the workers.  
 14 **Q. And I understand that you might not know the**  
 15 **answer to this, because it sounds like it's a little**  
 16 **bit outside of your responsibility now, but since you**  
 17 **did work on this side in the past, you previously**  
 18 **said that you would sometimes work at the front desk,**  
 19 **and brothel work -- people like brothel workers,**  
 20 **members of the public would come in to get their**  
 21 **licenses. Do you have any idea where that**  
 22 **information goes when brothel workers come in to get**  
 23 **a license just based on your past experience working**  
 24 **with the public and at the front desk?**  
 25 A. What information are you asking about?

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1 Q. A brothel worker comes in, they want a  
 2 license.  
 3 A. A work card?  
 4 Q. A work card to be licensed to work at the  
 5 brothel.  
 6 A. Okay.  
 7 Q. The Eden software doesn't track that at all?  
 8 A. No.  
 9 Q. Nobody enters that information in?  
 10 A. It would go in a different system than our  
 11 Eden system.  
 12 Q. What system?  
 13 A. Spillman is what we're working with right  
 14 now.  
 15 Q. What kind of system is that?  
 16 A. It's a system we use for everything. The  
 17 dispatchers use it, records uses it, deputies do  
 18 their reports in it.  
 19 Q. Okay. So it's something that a lot of law  
 20 enforcement agencies use?  
 21 A. Yes.  
 22 Q. Okay. And the Eden system is accounting?  
 23 A. Correct. And basically the county just uses  
 24 it, that I'm aware of.  
 25 Q. The county uses it. So when brothel workers

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1 come in to get their permit, they also have to pay  
 2 money for that as well; is that correct?  
 3 A. Yes.  
 4 Q. Does the accounting for the workers go into  
 5 Spillman?  
 6 A. I'm not sure.  
 7 Q. But you know it doesn't go into --  
 8 A. They put information in there. I just don't  
 9 know what they put in there.  
 10 Q. Okay. But you know that the information  
 11 doesn't go into Eden?  
 12 A. Correct.  
 13 Q. Okay. So this fee amount is automatically  
 14 generated by what the brothel owner paid previously?  
 15 A. Yes.  
 16 Q. And you rely on the brothel owner to update  
 17 you to let you know --  
 18 A. Yes.  
 19 Q. -- we have new workers and we're paying more  
 20 this time?  
 21 A. Yes.  
 22 Q. Okay. So this last one where it says  
 23 approximate date renewal was mailed, did Eden  
 24 generate this?  
 25 A. No.

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1 Q. Okay. Did you create this?  
 2 A. Yes.  
 3 Q. When did you create this part of the  
 4 spreadsheet?  
 5 A. When I got the records request.  
 6 Q. Okay. And is that common practice for you  
 7 if somebody sent you a records request and wanted to  
 8 know information that you didn't have, you would  
 9 create a spreadsheet for that member of the public?  
 10 A. No.  
 11 Q. No, okay.  
 12 A. We don't normally do any type of creating of  
 13 anything.  
 14 Q. Okay.  
 15 A. However, we have the option to --  
 16 Q. Okay.  
 17 A. -- create by policy, if we feel it will help  
 18 or answer some questions. We are not -- we don't  
 19 have it.  
 20 Q. Okay.  
 21 A. But we can. So our Eden system did not  
 22 provide that date anywhere in there. I couldn't  
 23 print it out from there at all.  
 24 Q. So when you pulled the report from the Eden  
 25 system, did you copy and paste the first four

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1 portions of the report into like a Word document?  
 2 A. Into Excel.  
 3 Q. Into Excel. And then you created a new  
 4 table with the approximate dates?  
 5 A. Yes.  
 6 Q. Okay. And since you said that you do not  
 7 keep -- that you didn't have any records to provide,  
 8 how did you come up with those approximate dates?  
 9 Was it from memory?  
 10 A. Standard practice from when I was trained  
 11 was that we sent out renewals by the end of the  
 12 second week, no later than the end of the second week  
 13 of the month that they're due.  
 14 Q. By the end of the second month?  
 15 A. Or that they're going to expire I guess I  
 16 should say. So the end of the second week of the  
 17 month they're going to expire.  
 18 Q. So standard practice you never sent them out  
 19 earlier? It was always by the end of the second week  
 20 of the month that they were going to expire?  
 21 A. Those dates are just approximately.  
 22 Sometimes it would be before, sometimes it would be  
 23 after.  
 24 Q. Okay.  
 25 A. We tried to stick with no later than the

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1 last of the second -- the end of the second week.  
 2 Daily events didn't always let that happen.  
 3 Q. Okay. I understand. And you say that it  
 4 was standard practice the way that you were trained.  
 5 Is there a policy within the office or was it the  
 6 person who was training you to take over their job?  
 7 Like, what do you mean by that?  
 8 A. It was the person training me that I took  
 9 over her job.  
 10 Q. Okay. So that was the way that that  
 11 particular person did it?  
 12 A. Yes.  
 13 Q. And she trained you how to do it?  
 14 A. Yes.  
 15 Q. What did that person end up doing? Were  
 16 they leaving the sheriff's office or did that person --  
 17 A. She retired after 30 years.  
 18 Q. After 30 years?  
 19 A. And she did them for 30 years.  
 20 Q. She was an Admin Tech II as well?  
 21 A. She was the assistant sheriff.  
 22 MS. BRUCH: Off the record.  
 23 (Discussion off the record.)  
 24 BY MS. CAHILL:  
 25 Q. So I'm now pulling out the forms so that we

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1 can look at Sheri's Ranch, Chicken Ranch, Love Ranch,  
 2 and Alien Cathouse. When you were preparing these  
 3 dates, it looks like all of the dates match for  
 4 Sheri's Ranch, Chicken Ranch, and Love Ranch, but not  
 5 for Alien Cathouse, is that correct, or is there all  
 6 of the dates for the approximate date the renewal was  
 7 mailed?  
 8 A. The Alien Cathouse matches for the two  
 9 quarters that they were in business.  
 10 Q. They're at the end there. Okay, I see that.  
 11 And you always sent it out on the exact same day, the  
 12 renewal?  
 13 A. Can you clarify what exact day? The day  
 14 that's on the paperwork?  
 15 Q. So I see here this is the approximate date  
 16 and I see that all the dates match. Was it your  
 17 standard practice that you would always send them out  
 18 on the same date or are you giving me more of an  
 19 average?  
 20 MS. BRUCH: So object as to form. Are you  
 21 asking on the same date meaning that the renewals  
 22 went out to each of the brothels on the same day? Is  
 23 that what your question is, or are you asking --  
 24 MS. CAHILL: I'll rephrase it.  
 25 MS. BRUCH: Okay. Thanks.

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1 BY MS. CAHILL:  
 2 Q. So you have an approximate date here. Is  
 3 this date, does this mean that this is about the date  
 4 where maybe -- so say, for example, around  
 5 December 15th, 2016, which is the first date there, I  
 6 sent out a bunch of renewals, but I sent them out the  
 7 week of the 15th, or whatever date that you actually  
 8 mailed it out, did you always send -- did you send  
 9 out the renewals for all the brothels on that same  
 10 day or were they scattered throughout the week?  
 11 A. Everything was sent the same day.  
 12 Q. Okay.  
 13 A. I just can't answer which day that was.  
 14 Q. That's fine. So this is not an average?  
 15 This is not, "the week of the 15th I sent out one  
 16 renewal to Love Ranch, another, and then later that  
 17 week I sent it to Chicken Ranch?" Everything was  
 18 sent out the same day?  
 19 A. Same day.  
 20 Q. Okay. So those are the forms that you  
 21 turned over as part of the public records request.  
 22 And I will go ahead and put those aside, and we'll  
 23 continue moving through the paperwork. And like we  
 24 said, we would stick with what we already had and  
 25 then we'll move to the paperwork that you guys

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1 provided today.  
 2 A. Okay.  
 3 MS. CAHILL: So what I have here I'm going  
 4 to go ahead and mark as Plaintiffs' Exhibit B.  
 5 (Thereupon Plaintiffs' Exhibit B  
 6 was marked for identification.)  
 7 BY MS. CAHILL:  
 8 Q. We'll go ahead and hand this to your  
 9 attorney.  
 10 Miss Stark, do you recognize that form?  
 11 A. Yes.  
 12 Q. Could you tell me what that form is?  
 13 A. That is our automatic renewal notice that  
 14 prints out of our Eden system.  
 15 Q. Who created that form before it was input  
 16 into the Eden system?  
 17 A. The company? The Tyler Eden company,  
 18 like --  
 19 Q. Did the Eden system create that form or did  
 20 somebody in this office create the form?  
 21 A. The Eden system.  
 22 Q. Okay. So the Eden system created that  
 23 invoice, or that renewal form?  
 24 A. Yes.  
 25 MS. BRUCH: So objection to form. I just

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1 need to make sure that she understands the question.  
 2 So are you talking about the template for the form,  
 3 who created that template, or are you talking about  
 4 who input the data that's on the form? If you could  
 5 clarify please.  
 6 BY MS. CAHILL:  
 7 Q. I will clarify. Absolutely.  
 8 So I understand that this form is automatic,  
 9 you enter a report and that form then prints out from  
 10 the Eden system. And I believe that you just said it  
 11 was owned by Tyler, which is not really relevant, but  
 12 just I want to be able to -- so did, to your  
 13 knowledge when you bought the Eden system off the  
 14 shelf, did Tyler create this form for your company to  
 15 use or did somebody in this office input the  
 16 information that they needed into the system?  
 17 A. So Tyler is the one that put the information  
 18 in.  
 19 Q. Okay.  
 20 A. Based on information that I gave them.  
 21 Q. Okay.  
 22 A. As far as what would be -- I mean, I had no  
 23 idea when we were going through the licensing system  
 24 what the renewal would look like, but they would ask  
 25 me questions.

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1 Q. So you went through a wizard where a box  
 2 would come up and you would say, yes, I need the name  
 3 of the Nye County sheriff and I need this, you went  
 4 through and created the system by going through a  
 5 series of questions?  
 6 A. Verbally though.  
 7 Q. Verbally?  
 8 A. Yes.  
 9 Q. Okay. So a representative met with you --  
 10 A. Yes. Yes.  
 11 Q. -- and asked you what you wanted the form to  
 12 look like?  
 13 A. Yes.  
 14 Q. And you're the person that met with that  
 15 representative?  
 16 A. Yes.  
 17 Q. When was that?  
 18 A. Don't remember.  
 19 Q. Okay. It was --  
 20 A. 2011.  
 21 Q. Is it fair to guess that it was around the  
 22 time --  
 23 A. Yes.  
 24 Q. -- you adopted the Eden system?  
 25 A. Yeah.

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1 Q. So this is the same renewal notice that you  
 2 guys have always used since 2011?  
 3 A. Yes.  
 4 Q. So you met with the Tyler representative and  
 5 you told him or her what you needed the renewal  
 6 notice to look like, or did somebody else in the room  
 7 also?  
 8 A. Nobody told him what it needed to look like.  
 9 Q. Okay.  
 10 A. That is what they had in the system. So all  
 11 we provided was, like, our address.  
 12 Q. Okay.  
 13 A. And basically they asked us what we needed  
 14 for payment information, you know, like what to put  
 15 in the system for payment information. Like, if our  
 16 payments change, we can't -- we can't change -- we  
 17 can physically overwrite them to change them, but,  
 18 like, what prints out on the renewal --  
 19 Q. Okay.  
 20 A. -- that we have to go through them. They  
 21 have to go in and actually make the changes for us.  
 22 So the form wasn't necessarily picked by me, and they  
 23 just said here's our renewal, you know, this will be  
 24 our renewal form, and we'll put your address on it  
 25 and do you want the seal on it. And that's basically

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1 it as far as the renewal form and here's what you're  
 2 going to get. You have no other options.  
 3 Q. So you didn't tell them this is what the  
 4 county needs?  
 5 A. No.  
 6 Q. They told you this is what we're giving you?  
 7 A. This is what you get.  
 8 Q. And at no point did you say, well -- at any  
 9 point during that interview, to your memory, did you  
 10 say the county needs X and the salesperson said  
 11 that's not possible? Was there anything you  
 12 requested that they couldn't provide for you on this  
 13 form?  
 14 A. No.  
 15 Q. Okay. All right. So at the top of the form  
 16 there's the license number. Is that the brothel  
 17 license number?  
 18 A. Yes.  
 19 Q. And the license description describes that  
 20 this is for a brothel license. And the expiration  
 21 date, would you tell me what that is?  
 22 A. The last day of the quarter.  
 23 Q. Okay. That's the last day of the quarter?  
 24 A. Yes.  
 25 Q. Okay. And what does "activity number" mean?



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1 A. That's the number that generates when we  
 2 print out the renewals. It gives it a number. We do  
 3 a batch generation. The computer generates a number,  
 4 that activity number.  
 5 Q. Okay. And is the activity number calculated  
 6 per brothel or is it random? So 5701, would the  
 7 Chicken Ranch be activity number 5702 or would the  
 8 next renewal be 5702?  
 9 A. I don't actually know.  
 10 Q. Okay. Something that you had never thought  
 11 about before?  
 12 A. No.  
 13 Q. Okay. So the payment due date, that's when  
 14 the brothel payment is due right after that,  
 15 underneath expiration date where it says payment due  
 16 date?  
 17 A. That's the date on the renewal.  
 18 Q. Okay. And that's automatically generated by  
 19 the quarter?  
 20 A. Yes.  
 21 Q. Okay. And the total due, you said that's  
 22 generated based on what they paid the last time?  
 23 A. Correct.  
 24 Q. And the customer number I'm assuming is  
 25 unique to the Love Ranch brothel?

Page 55

1 A. Correct.  
 2 Q. Okay.  
 3 A. Computer generated when they first are  
 4 processed.  
 5 Q. Now, the supplemental information where it  
 6 says 6 to 10 prostitutes, 11 to 25 prostitutes, now  
 7 you said that you have, on your end you have no way  
 8 of knowing how many sex workers are working at the  
 9 brothel at one time, that you are reliant on the  
 10 brothel owners to tell you how many workers are  
 11 working there?  
 12 A. Yes.  
 13 Q. Is that correct?  
 14 A. Yes.  
 15 Q. Okay. But there's somebody at the county  
 16 that does know how many people have permits to work  
 17 there, but it's not entered into your system, it's  
 18 entered into this Spillman database, or you think  
 19 that it might be?  
 20 MS. BRUCH: Objection, compound. If you can  
 21 break that question down please.  
 22 BY MS. CAHILL:  
 23 Q. Sure. So the number of prostitutes here on  
 24 this supplemental information, that's generated based  
 25 off of the past report; is that correct?

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1 A. The past payment.  
 2 Q. The past payment. How does this information  
 3 get updated?  
 4 A. By the brothel payment the following  
 5 quarter.  
 6 Q. Okay. So if they sent you a payment for  
 7 more money than the last time, you would then assume  
 8 that that meant they had more prostitutes working  
 9 there?  
 10 A. Yes.  
 11 Q. Would you go into the system and change this  
 12 information?  
 13 A. Yes. There's a checkbox that I can click to  
 14 change it.  
 15 Q. Okay. And you think that it could -- that  
 16 it's possible that somebody in Pahrump, when they're  
 17 licensing the sex workers here or they're giving them  
 18 the permits, that they're entering that information  
 19 into Spillman, so they're entering it into different  
 20 software?  
 21 A. For the workers or?  
 22 Q. For the workers.  
 23 A. Yes. Yes.  
 24 Q. Okay. And you have no access to Spillman or  
 25 do you have access to Spillman?

Page 57

1 A. I do.  
 2 Q. Do you ever cross reference what's in  
 3 Spillman with what's in Eden?  
 4 A. No, because all that's in Eden is the  
 5 brothels, not the workers.  
 6 Q. Okay. But do you use Eden for other types  
 7 of accounting or only the brothels?  
 8 A. Only licensing.  
 9 Q. Only licensing. So liquor licensing?  
 10 A. Yes.  
 11 Q. Okay. And the space underneath where it  
 12 says contacts, name, role, title, address, is that  
 13 for you to fill in or is that for the -- could you  
 14 just tell me what that is?  
 15 A. It's for the individual that we mail it to  
 16 to fill in, but it's not required to be filled in.  
 17 It's just --  
 18 Q. It's not required?  
 19 A. No.  
 20 Q. Okay. So at the bottom of the form where it  
 21 says, "I am no longer conducting business in the city  
 22 as of" blank, could you tell me what this portion of  
 23 the form is for?  
 24 A. If their business closed, they're supposed  
 25 to fill that out and sign it.

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1 Q. But only if the business closed?

2 A. Correct.

3 Q. Okay. Have you ever -- okay. That's fine.

4 So we are going to move forward with the next piece

5 of information that we already had. So what I'm

6 giving you now will be marked as exhibit, Plaintiffs'

7 Exhibit C.

8 (Thereupon Plaintiffs' Exhibit C

9 was marked for identification.)

10 BY MS. CAHILL:

11 Q. Okay. Could you tell me what this form is?

12 A. I can tell you what it is, but I didn't

13 generate it.

14 Q. Okay. And we'll get to that. Could you

15 just tell me what it is?

16 A. So it is an agenda form --

17 Q. Okay.

18 A. -- that is given to the county admin

19 department to put -- I can't even think of the word,

20 but a listing on for the meeting to put -- I can't

21 think of the word I want to use for it. To put it on

22 the agenda, but there's a word, to put -- like place

23 a hold on a spot for us for an agenda item.

24 Q. Okay. So here it's checked off "action."

25 Would it be something like an action item?

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1 A. Yeah.

2 Q. Okay.

3 A. Basically we send in usually the form, and

4 then we have a week to send any backup that goes with

5 that, so it just kind of gives the admin heads up,

6 hey, we need to place it on the next meeting for this

7 action or this discussion.

8 Q. Okay. And so you were quick to say that you

9 didn't create this agenda information form. Do you

10 know who did?

11 A. I can tell you it's one of two people.

12 Q. Okay.

13 A. It's either going to be my supervisor, which

14 is Janice Maurizio, or Samantha Tackett, because she

15 was going to redo the agenda form that I gave her.

16 Q. Samantha Packet?

17 A. Tackett.

18 Q. Could you spell that name for the --

19 A. T-a-c-k-e-t-t.

20 Q. Okay. Thank you. Have you seen --

21 A. Actually, I could -- if I can go back, I

22 could tell you by the contact person who did it. I

23 didn't realize that was on there.

24 Q. Go ahead.

25 A. So the contact person is Janice Maurizio, so

Page 60

1 she did it.

2 Q. Okay. So whenever somebody fills in this

3 agenda form, the person that filled it out is listed

4 as the contact person?

5 A. Yes.

6 Q. Okay. So let's go backwards a little bit

7 before we go through this form. You did mention that

8 you used to have responsibilities that you do not

9 have at the moment. Was it ever your responsibility

10 to create this agenda information form?

11 A. Yes.

12 Q. Okay. And how long did you do that?

13 A. Same amount of time. Seven years.

14 Q. Okay. And this was one of the things that

15 Janice took over last year?

16 A. Correct.

17 Q. You did -- you did say earlier that even

18 though officially this responsibility has been taken

19 from you, that you are still, in fact, doing most of

20 the work. Is this something -- is this one of the

21 things that you are no longer doing?

22 A. So are you referring just to the licensing

23 side, because we do agenda forms for other things

24 besides licensing.

25 Q. Okay. So you do agenda forms for other

Page 61

1 licensing but not for the brothels?

2 A. No. Right now Janice is doing most of the

3 forms, the agenda forms.

4 Q. Okay.

5 A. However, this particular one that she did,

6 they were provided an agenda form from me prior to

7 her redoing it.

8 Q. So typically you create the agenda form?

9 A. (Nods head.)

10 Q. And but --

11 MS. BRUCH: Is that "yes"?

12 THE WITNESS: Yes.

13 BY MS. CAHILL:

14 Q. This particular time you did the agenda form

15 but somebody else recreated it?

16 A. Yes.

17 Q. And that person was Janice?

18 A. Yes.

19 Q. Okay. Had Janice ever done that before?

20 A. No. Recreated it?

21 Q. Yes.

22 A. No.

23 Q. Looking at this form today, are there any

24 differences from what you created and from what

25 Janice changed it to?

Page 62

1 A. Yeah, she added stuff to it.

2 Q. Okay. So she added to the form, but she

3 didn't -- did she take anything away from the form?

4 A. I couldn't answer that unless I had it in

5 front of me.

6 Q. Okay. Do you know what happened to the

7 original agenda form that you created?

8 A. It would have been given to the admin

9 department --

10 Q. Okay.

11 A. -- when the stuff was turned in.

12 Q. And is that something that you would

13 physically give to the admin department or that you

14 would email a scanned copy of?

15 A. Email.

16 Q. Okay. So you sent it to the agenda

17 department and Janice added some stuff to the agenda

18 form?

19 A. Yes.

20 Q. What did she add?

21 A. Looks like she added the last three lines.

22 Q. So where -- so underneath where it says,

23 "complete description of requested action," is it

24 your testimony today that you drafted this first

25 part, "Attached, please find the list of existing

Page 63

1 brothel renewals," is that what you wrote on the

2 form?

3 A. Unless I was looking at it, I couldn't tell

4 you if she took something out or --

5 Q. Okay. That's fine. But you know -- you

6 think that she definitely added the last three lines,

7 "per ordinance 5.4.190"?

8 A. Yes.

9 Q. Okay. And then "these facilities have been

10 inspected"?

11 A. Yes.

12 Q. "It is the recommendation of NCSO staff"?

13 A. Yes.

14 Q. She added that?

15 A. Yes.

16 MS. BRUCH: Can we have a bathroom break?

17 MS. CAHILL: Absolutely.

18 MS. BRUCH: Thank you.

19 (A recess was taken.)

20 EXAMINATION

21 BY MR. RANDAZZA:

22 Q. So you've previously testified that you sent

23 out the renewal form about two weeks before the

24 expiration period?

25 A. Yes.

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1 Q. And just I'm looking at this. I want to

2 flip to the most recent one.

3 So this -- do you want to mark that? I'm

4 going to tear this out of this whole packet.

5 MS. CAHILL: We'll leave it in.

6 MR. RANDAZZA: Leave it in, okay. So this

7 whole packet here, which you previously produced, and

8 we'll mark that as Exhibit D.

9 (Thereupon Plaintiffs' Exhibit D

10 was marked for identification.)

11 BY MR. RANDAZZA:

12 Q. And I will put a bookmark in here for you to

13 flip to the most recent one. So this is all of the

14 renewal notices that have been sent out. Do you

15 recognize this?

16 A. Yes.

17 Q. And if we flip to this one, this is the most

18 recent one that you sent out; is that right?

19 A. Does it say 7-1?

20 Q. It does.

21 A. Yes.

22 Q. Do the brothels typically turn these forms

23 back in to you?

24 A. No.

25 Q. So it says at the bottom there's a signature

Page 65

1 line on it, right?

2 A. Yes.

3 Q. And then there's a checkbox that says, "I'm

4 no longer conducting business in the city as of"

5 date, and then they would sign it?

6 A. Correct. Yes.

7 Q. Now, this is just how I'm reading this, and

8 I want to know if you read it the same way, would I

9 turn this in only if I were ceasing to do business?

10 A. The bottom part definitely would just be

11 filled out if you were going to be out of business.

12 Q. Okay.

13 A. As far as how I look at it. But there

14 really is nothing on that sheet to tell you what to

15 do with it.

16 Q. Okay. So the brothels just send a check?

17 A. Most of them.

18 MS. CAHILL: You say "most."

19 THE WITNESS: It's sporadic. Sometimes

20 they'll include a copy, sometimes not.

21 MS. CAHILL: Of that form?

22 THE WITNESS: Yeah. Just like -- just like

23 a photocopy of it.

24 MS. CAHILL: But they only sign it if

25 they're going out of business?

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1 THE WITNESS: That's what it should be used  
 2 for. I know I have some, not just maybe on the  
 3 brothel side, but I've seen signatures down there for  
 4 on the liquor and gaming side as well here and there.  
 5 MS. CAHILL: Okay.  
 6 THE WITNESS: Not consistently.  
 7 BY MR. RANDAZZA:  
 8 Q. There's a number of other printouts here  
 9 that came with this and I...  
 10 A. You can't...  
 11 MS. BRUCH: Oh, come on, man. You can't  
 12 read that?  
 13 BY MR. RANDAZZA:  
 14 Q. I thought it was my age and my eyes, given  
 15 that we have some young ladies here that probably  
 16 have better vision. Can you tell me what that is?  
 17 A. So what that is is I provided a screen  
 18 shot --  
 19 Q. Okay.  
 20 A. -- of the Eden screen where I receipt the  
 21 payment.  
 22 Q. Okay.  
 23 A. Basically the two -- the one side just has  
 24 the brothel name, the address, the owner's name, the  
 25 contact name, the licensee, the actual licensee. And

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1 the first side over there has just the activity, I  
 2 guess, the screen shot of the activity where it is  
 3 only really going to show on this how much they paid.  
 4 And then it provides on the top, or halfway through  
 5 it provides the activity date and the payment due  
 6 date, the 7-1, 7-1. But because it was a screen  
 7 shot, it would not allow me to enlarge it.  
 8 Q. Okay.  
 9 A. And I was just trying to provide whatever I  
 10 could.  
 11 Q. Okay.  
 12 A. It's really hard to read.  
 13 Q. Yeah. I'm just trying to figure out what  
 14 information is in it. Is the date the check is  
 15 received in this?  
 16 A. No.  
 17 Q. Okay. So this you've said is the form.  
 18 You've authenticated this is the form that you sent  
 19 out?  
 20 A. Yes.  
 21 Q. Nobody sends those in; once in a while  
 22 somebody does?  
 23 A. Right.  
 24 Q. So does the office consider them to be  
 25 relevant to the renewal or irrelevant?

Page 68

1 A. Irrelevant.  
 2 Q. Okay. And if I skip forward in this packet,  
 3 I have a number of deposit slips. Do you fill these  
 4 out?  
 5 A. Yes. I should say some of them. Some of  
 6 them are probably Janice down in my southern office.  
 7 Q. So the last one here -- these come in  
 8 quarterly?  
 9 A. Yes.  
 10 Q. So every quarter you send out one of those  
 11 notices?  
 12 A. Yes.  
 13 Q. This one here says for -- can you read what  
 14 it says on there?  
 15 A. Yes. "For activity date 7-1 of '18."  
 16 Q. Is that your writing?  
 17 A. Yes.  
 18 Q. So this is for July 1st?  
 19 A. Yes.  
 20 MS. BRUCH: I don't know if -- I don't think  
 21 you were sitting here when LaTeigra and I went  
 22 through this, but this right here, those are the four  
 23 checks for this quarter, because you said there's no  
 24 check --  
 25 MR. RANDAZZA: Right.

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1 MS. BRUCH: -- attached and there was no  
 2 check to the packet, but those are the four checks  
 3 for this quarter.  
 4 MR. RANDAZZA: Okay. So I have here the  
 5 check for this quarter. Let us --  
 6 MS. CAHILL: We can mark that as Exhibit E.  
 7 MR. RANDAZZA: Yeah, we'll mark that. Are  
 8 there two from the Cherry Patch? Or these are --  
 9 MS. BRUCH: No, it's two copies.  
 10 MR. RANDAZZA: Two copies, okay. So the  
 11 relevant one I've got here is for the Cherry Patch.  
 12 Mark that.  
 13 (Thereupon Plaintiffs' Exhibit E  
 14 was marked for identification.)  
 15 BY MR. RANDAZZA:  
 16 Q. So what's the date on that check?  
 17 A. June 28th, 2018.  
 18 Q. Okay. So we have a June 28th check. We  
 19 have a July 1st activity date?  
 20 A. Correct.  
 21 Q. So do we have --  
 22 MS. CAHILL: No, I apologize, Ms. Bruch, but  
 23 did you give us two copies of these?  
 24 MS. BRUCH: Yes. They're right here. So  
 25 here's one copy, and that's the same thing right

Page 70

1 there.

2 MS. CAHILL: Okay. So I want you to be able

3 to keep track of what we're giving, since we didn't

4 have them before.

5 MS. BRUCH: I've got it right here in front

6 of me. I have a copy.

7 BY MR. RANDAZZA:

8 **Q. All right. So put that with that.**

9 **So do we have anything here that indicates**

10 **that the check came in after July 1st?**

11 A. No.

12 MS. BRUCH: Are you -- I'm sorry, object to

13 form. Are you saying is there anything on these

14 papers that indicate that?

15 BY MR. RANDAZZA:

16 **Q. Have you turned over anything that indicates**

17 **that, that it came in after July 1st?**

18 A. No.

19 **Q. To the best of your knowledge is there**

20 **anything left that hasn't been turned over that would**

21 **indicate that?**

22 A. For all of them or --

23 **Q. I'm only really concerned about the Cherry**

24 **Patch.**

25 A. Yes.

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1 **Q. Okay. Is there a reason that hasn't been**

2 **turned over?**

3 A. It was just a conversation that I had with

4 the accountant.

5 **Q. Okay. Can you provide me a copy of that?**

6 A. Not right this second, but I can.

7 MS. BRUCH: Well, you say it was a

8 conversation as if there was a document.

9 THE WITNESS: There's an email.

10 MS. BRUCH: Oh, okay. News to me.

11 BY MR. RANDAZZA:

12 **Q. And, okay, so is that not responsive to our**

13 **document request?**

14 A. Not really. I wouldn't have -- it was -- I

15 just had sent him an email asking if he was still

16 over the payments and questioned why we hadn't

17 received it yet.

18 **Q. Okay. So it was --**

19 A. It was just a general, "hey, I've receipted

20 all these and I don't see yours," and the courtesy of

21 "where is yours."

22 **Q. Okay.**

23 A. So...

24 **Q. So the check dated 28th might have arrived**

25 **after the 1st?**

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1 A. Yes.

2 **Q. And did any of the other checks arrive after**

3 **the 1st?**

4 A. I can't honestly answer that. I can

5 estimate it, but just -- but I can't do by mail. I

6 mean, I can't say for sure. I mean, all I would be

7 doing is giving you like a week timeframe from the

8 date of the check, but that's very vague.

9 **Q. Okay. So you could vaguely tell me that**

10 **every one of these checks took about a week to get**

11 **in?**

12 A. Other than one. I can tell you the Sky

13 Services, the exact date of the check is the date

14 that it was in the sheriff's office front office in

15 our hands.

16 **Q. Which one is Sky Services?**

17 A. That's the only one I know for positive.

18 **Q. The one above it?**

19 A. Yeah.

20 **Q. Okay. And why do you know that?**

21 A. Because they called me while he was in the

22 office writing the check.

23 **Q. Okay.**

24 A. To make sure what amount he owed.

25 **Q. Okay. And that's dated 6-25. I'm sorry,**

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1 **June 28 or June 25th?**

2 A. June 25th.

3 **Q. Okay. So that's dated June 25th.**

4 MS. BRUCH: Can I, just for a second? The

5 email that you're talking about, can you access that

6 here? Is it on a computer that you can access here

7 today or is it printed out somewhere? I'm just

8 wondering if you have access to it, if you can get it

9 for them.

10 THE WITNESS: I can see if I can use one of

11 their computers and see.

12 MS. BRUCH: Okay. Do you want to take a

13 break and see if she can do that?

14 MR. RANDAZZA: Sure.

15 MS. CAHILL: Yeah.

16 MS. BRUCH: Okay. Thanks.

17 (A recess was taken.)

18 MS. CAHILL: Let's go back on the record.

19 BY MR. RANDAZZA:

20 **Q. So we went off the record because there's**

21 **apparently an email relevant to this discussion but**

22 **we don't have it, but we're going to try to get a**

23 **hold of that?**

24 A. Yes.

25 **Q. Okay. And but so in the records we have**

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1 here, everything says that it came in on time, but  
 2 this email says it didn't?  
 3 A. The email was a courtesy email, because I  
 4 work well with the accountant. And when I spot  
 5 checked on that particular day, I noticed I had all  
 6 the rest of the payments --  
 7 **Q. Okay.**  
 8 A. -- and didn't have that one. So I -- it's  
 9 not a standard that we do that, I just called and  
 10 said -- or didn't call, I emailed and said, "hey, you  
 11 still over these, because I haven't got it yet."  
 12 **Q. Okay. And so given that it was sent on the**  
 13 **28th, it would -- and what day was the email?**  
 14 A. That would have been the 3rd. And in that  
 15 email I think there's three lines I asked him. "Are  
 16 you still over the payments for Dennis Hof's  
 17 brothels," and he said yes. "Is it still 4375, can  
 18 you provide me a copy of the liquor license and I  
 19 will mail payments today." And it would be dated  
 20 7-3.  
 21 **Q. Okay. But it's dated the 28th?**  
 22 A. The check's dated the 28th. My email is  
 23 dated 7-3.  
 24 **Q. Okay. So and the records here don't reflect**  
 25 **when it came in?**

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1 A. And I didn't even -- I should have probably  
 2 wrote it down but we didn't -- we didn't have to keep  
 3 track of all that stuff at that point. We didn't  
 4 really keep track of when they came in.  
 5 **Q. You didn't really keep track of when**  
 6 **payments came in?**  
 7 A. Correct.  
 8 **Q. Ever?**  
 9 A. Ever.  
 10 **Q. So has this happened with other brothels in**  
 11 **the past?**  
 12 A. What?  
 13 MS. BRUCH: Thank you.  
 14 THE WITNESS: Has what happened?  
 15 BY MR. RANDAZZA:  
 16 **Q. That you've emailed them and said, hey,**  
 17 **where's your check?**  
 18 A. Honestly, no. And probably only because  
 19 I've always been close contact with Mr. Potter.  
 20 **Q. Mr. Potter being?**  
 21 A. Tom Potter, the accountant.  
 22 **Q. Oh, the accountant for my client?**  
 23 A. Yes.  
 24 **Q. Okay. So when other checks have not been**  
 25 **there on time, you haven't emailed anybody?**

Page 76

1 A. No.  
 2 **Q. Okay. So you did him a solid by saying,**  
 3 **hey, your check's late?**  
 4 A. Yes.  
 5 **Q. Okay.**  
 6 MS. CAHILL: But other brothels have not  
 7 sent in their checks on time?  
 8 THE WITNESS: Can I ask what you consider  
 9 "on time"?  
 10 BY MR. RANDAZZA:  
 11 **Q. Why don't you tell us what you consider on**  
 12 **time, because we don't know what's on time. The**  
 13 **county knows what's on time.**  
 14 A. Okay. So the proper way for me to answer  
 15 that is we don't have cutoff dates. Never have had  
 16 cutoff dates on any of the licenses. As far as,  
 17 like, going from how I was trained to the way we ran  
 18 business, if that's how you want to say it, we took  
 19 payments whenever the payments came in.  
 20 The system doesn't generate late fees. We  
 21 don't have a system -- I'm not saying -- it's capable  
 22 of it, but we don't do that. Haven't done it. Still  
 23 don't do that. So they're accepted whenever we get  
 24 them. So I don't know how to answer it was on time  
 25 because I can go by the expiration date, but I can't

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1 really give you an honest answer.  
 2 MS. BRUCH: So I guess it's objection, calls  
 3 for a legal conclusion.  
 4 Go ahead.  
 5 BY MR. RANDAZZA:  
 6 **Q. I'm sorry, please finish your answer.**  
 7 A. I just can't give you, like, an absolute  
 8 answer of throughout the seven years I've done it  
 9 whether I've had them all prior to the expiration  
 10 date or whether some of them have been after, that  
 11 type of thing.  
 12 **Q. Okay.**  
 13 A. Because we've accepted them whenever they  
 14 came in.  
 15 **Q. Okay. So what you're saying is your pattern**  
 16 **and practice has been --**  
 17 A. Yes.  
 18 **Q. -- that it doesn't matter when they get**  
 19 **there?**  
 20 A. Correct.  
 21 **Q. Except for this time?**  
 22 A. It didn't matter to me.  
 23 **Q. Okay. Did it ever matter to the**  
 24 **commissioners?**  
 25 A. Not that I'm aware of.



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1 Q. Only this time?

2 A. Correct.

3 Q. Are you aware of the sheriff's office ever

4 recommending that a license not be renewed?

5 A. Not that I can ever think of, unless it's

6 something Janice and the sheriff have done that I was

7 no part of, but not that I would have anything to do

8 with.

9 I personally go in with a list the whole

10 time I had it and ask for renewal of all of them.

11 They may have -- the commissioners may have

12 questions, you know, or say, hey, we want to check on

13 this one, but it was never not renewed.

14 Q. Do you go to all the quarterly renewal

15 meetings?

16 A. I did, prior to Janice taking them over.

17 Q. Janice?

18 A. Maurizio, my supervisor taking over the

19 licensing.

20 Q. Okay.

21 A. So for a short period when she thought she

22 was going to do them, I didn't go to the meetings;

23 however, I usually listen to them in my office.

24 Q. Did you go to the last one?

25 A. Yes, I did.

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1 Q. Was there anything unusual about it?

2 A. I'm not quite sure how to answer that one.

3 I mean, unusual being I didn't -- I didn't know

4 anything that was -- that took place in that meeting,

5 if that's what you're asking. I didn't know prior to

6 that meeting any of it that took place.

7 Q. Well, how many meetings had you gone to or

8 listened to before this one?

9 A. Almost all of them in the seven years that

10 I've been there, so two a month, so...

11 Q. Two a month?

12 A. There's two a month. There's two a month

13 and 12 months in a year, so however many that is.

14 I'm not a mathematician.

15 Q. Gosh, I'm not either. Did you have to make

16 me look bad like that?

17 A. I mean, I've -- I'm sure -- I know.

18 Q. I'm going to take out the calculator.

19 A. It might not be all of them. I mean, I

20 might have been off for...

21 Q. Seven years?

22 A. Yes.

23 Q. Times 12 months is 84 --

24 A. Okay.

25 Q. -- months. Two a month?

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1 A. Two, yeah.

2 Q. Times two. So you've been to -- been to or

3 listened to about 168 meetings?

4 A. Yes.

5 Q. Is that renewal meetings?

6 A. No, the renewals are only once a year.

7 Q. Okay. That's what I was trying to get at.

8 A. Okay. Sorry.

9 Q. I meant these. So they're not quarterly

10 renewal meetings? I thought we said earlier they

11 were quarterly, not annual?

12 A. The renewals are quarterly.

13 Q. Okay.

14 A. But I only approach the board one time a

15 year to do a whole listing of renewals, and it's like

16 an automatic renewal, because our fiscal year runs

17 from July to June.

18 Q. Okay.

19 A. So at the end of June we start a new fiscal

20 year.

21 Q. Okay.

22 A. And at the beginning of that year, I have to

23 provide a list of renewals that, automatic renewals

24 for people that I know have paid and they're still in

25 business and that sort, and then I have to provide

Page 81

1 that list.

2 Q. Okay. So the checks come in every quarter?

3 A. Yes.

4 Q. Tell me if I'm wrong here, or if I'm right.

5 The checks come in every quarter?

6 A. Yes.

7 Q. The county doesn't really care when?

8 A. Correct.

9 Q. And then at the end of the year, you bring

10 all of that to an annual meeting to simply say

11 they've renewed these four quarters this year?

12 A. Correct, because I provide them with a list

13 of fees on that renewal list --

14 Q. Okay.

15 A. -- of what I've collected for the fiscal

16 year.

17 Q. Okay. So there are quarterly renewals but

18 one annual renewal meeting?

19 A. Yes.

20 Q. Sort of a summary of what happened in the

21 year?

22 A. Yes. And I probably should say you could

23 ask if the county cared. I don't know that I could

24 say the county cared or not cared. The sheriff's

25 office, who accepts the payment, is would be the ones

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1 that wouldn't care. I mean, we've accepted the  
 2 payments all along. So the county wouldn't know  
 3 through any of the -- each quarter when we actually  
 4 receive the check.

5 **Q. Okay.**

6 A. The actual county as whole I guess is where  
 7 I'm going with that.

8 **Q. So it's safe to say if the check comes in**  
 9 **before the end of the quarter, they're good?**

10 A. Yeah.

11 **Q. So you've been to seven of these annual**  
 12 **meetings?**

13 A. Yes.

14 **Q. Have you ever been to one where the brothel**  
 15 **owners attend?**

16 A. No.

17 **Q. The brothel owners never attend that annual**  
 18 **meeting?**

19 A. No.

20 **Q. There's no requirement that they do so?**

21 A. Not that I'm aware of.

22 **Q. So in your seven years of seeing these**  
 23 **meetings, did anything about this meeting seem**  
 24 **unusual as compared to the other six?**

25 A. Not knowing what was going to happen was

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1 unusual. I mean, usually when I provide my renewal  
 2 list, they all go through. So they pulled two of  
 3 them at that particular meeting, and apparently the  
 4 sheriff knew about one of them, but I didn't know  
 5 about that one either. So as far as them pulling  
 6 them, that would be unusual for any of the meetings  
 7 I've gone to in the past.

8 **Q. I'm sorry, pulling? Pulling, what is**  
 9 **"them"?**

10 A. The two brothels that they actually pulled  
 11 during this last meeting, they shut down the Love  
 12 Ranch and had some stipulations on Sheri's. I can't  
 13 remember what they all were.

14 **Q. Did you create agenda forms for this**  
 15 **meeting?**

16 A. Yes.

17 **Q. Were they the same as the agenda forms that**  
 18 **were used on the August 7th meeting?**

19 MS. BRUCH: I think that was what -- that  
 20 line of questioning LaTeigra asked.

21 THE WITNESS: If this is the one that was  
 22 used, then no.

23 BY MR. RANDAZZA:

24 **Q. Okay.**

25 A. But I don't know which one they had.

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1 **Q. Okay. So this, Exhibit C, is the one that**  
 2 **you created or the one they used?**

3 A. It's not the one I created; however, I don't  
 4 know if they used this one and provided this one to  
 5 anybody. I'm not sure on their end how they -- I  
 6 don't know who sees it. I mean, when I give my  
 7 agenda form to the admin girls to put it on there, I  
 8 don't know if it goes any farther than that. I don't  
 9 know if all the commissioners or whatever get it. I  
 10 really don't know.

11 **Q. Okay.**

12 MS. CAHILL: Well, it's published on the  
 13 website. Do you know when it's published on the website?

14 THE WITNESS: No, I don't.

15 MS. CAHILL: Okay.

16 THE WITNESS: I don't. I didn't even know  
 17 the forms were published on there either. Just when  
 18 I thought I knew everything, right?

19 BY MR. RANDAZZA:

20 **Q. So you said that the forms were mailed to**  
 21 **the brothels on different dates; is that right?**

22 MS. BRUCH: I don't think that's what she  
 23 testified to.

24 BY MR. RANDAZZA:

25 **Q. Okay. Is that true?**

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1 A. No.

2 **Q. Okay. So you mailed them all out on the**  
 3 **13th of June?**

4 A. Yes. Well, I can't say exact date, that's  
 5 the problem. But I mailed them all on the date, and  
 6 that approximate date, they all go together. I go  
 7 in, I do a great big batch generation of every single  
 8 license for the county and I mail them all out that  
 9 same day.

10 **Q. Okay. So it could have been the 13th? It**  
 11 **could have been later?**

12 A. Yes.

13 **Q. But everybody got them sent out on the same**  
 14 **day?**

15 A. Yes. Our mail goes out at 2:00, 2:30 in the  
 16 afternoon, so I do it first thing in the morning and  
 17 put them out as a whole batch.

18 EXAMINATION

19 BY MS. CAHILL:

20 **Q. I do have some follow-up questions on the**  
 21 **agenda form, since we were just on that topic. If**  
 22 **you turn the page, the Nye County licensing board**  
 23 **with the amounts, who created -- who put in -- who**  
 24 **created this part of the agenda form?**

25 A. I did.

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1 Q. Okay. So all of this you put in?  
 2 A. Yes.  
 3 Q. When did you create this?  
 4 A. I don't have the actual cutoff date for when  
 5 the agendas go in --  
 6 Q. Okay.  
 7 A. -- in my head. It would have been provided  
 8 to them --  
 9 Q. Okay.  
 10 A. -- the deadline before this date. There's,  
 11 like, a two-week deadline. I just don't remember  
 12 what it was. I'm going to -- it's usually a couple  
 13 weeks before the meeting.  
 14 Q. Okay. So mid July?  
 15 A. Yeah.  
 16 Q. And turning to the next page on the exhibit  
 17 where it says "renewal procedure," did you also put  
 18 this into the form?  
 19 A. No.  
 20 Q. Do you know what this is?  
 21 A. Yeah, that's the renewal procedures for the  
 22 liquor licenses.  
 23 Q. Okay. How did this get attached to this  
 24 agenda form?  
 25 MS. BRUCH: Objection, calls for

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1 speculation.  
 2 BY MS. CAHILL:  
 3 Q. Okay. So you did not include this. Have  
 4 you ever seen this before?  
 5 A. Yes.  
 6 Q. When did you see it previously?  
 7 A. It's our county codes, so we commonly look  
 8 at them for our licensing stuff. There's a license  
 9 chapter in there.  
 10 Q. Okay. And this Nye County information, this  
 11 Nye County agenda information form is specifically  
 12 only for the brothels; is that correct?  
 13 A. That's correct.  
 14 Q. And this Nye County Code that refers to a  
 15 renewal procedure, you have -- it's your testimony  
 16 that you have absolutely no idea why this was  
 17 included with the agenda for the brothels?  
 18 A. Correct.  
 19 Q. And you don't know who included it?  
 20 A. I don't.  
 21 Q. Okay.  
 22 MR. RANDAZZA: Let's take a break here for a  
 23 second.  
 24 MS. CAHILL: Okay.  
 25 (A recess was taken.)

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1 BY MS. CAHILL:  
 2 Q. Let's go back on the record. So I actually  
 3 just have a couple more topics that we want to cover  
 4 with you.  
 5 MS. BRUCH: Topics or questions? Come on,  
 6 man.  
 7 BY MS. CAHILL:  
 8 Q. It actually won't take that much longer. So  
 9 going back to that letter that you sent us, you said  
 10 you specifically referred to the renewal paperwork.  
 11 You said, "the renewal paperwork comes to us with the  
 12 payment." Is it your testimony today that form, that  
 13 Exhibit B, that renewal notice, is that the renewal  
 14 paperwork you're referring to?  
 15 A. Yes.  
 16 Q. Is there any other renewal paperwork that  
 17 you didn't produce here today?  
 18 A. No.  
 19 Q. Okay. So that's the only renewal form?  
 20 A. Yes.  
 21 Q. Okay. So let's go ahead and take a look at,  
 22 because I promised your attorney we would go through  
 23 everything that you guys produced.  
 24 MS. BRUCH: Oh, I just wanted to make a  
 25 record so the judge knows what I gave you.

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1 MS. CAHILL: Oh, I'm not going to go through  
 2 every page, but I at least want to touch on what we  
 3 actually have here.  
 4 So the first thing that we handed over to  
 5 you that we marked as exhibit -- I believe it was --  
 6 that whole packet was D.  
 7 MS. BRUCH: D, and I don't know what  
 8 happened to it.  
 9 BY MS. CAHILL:  
 10 Q. So it's Exhibit D, and this is for the Love  
 11 Ranch. So this is a copy of the renewal form. It  
 12 says from January 1st, 2017, and there's no signature  
 13 down there. And to your knowledge you don't have a  
 14 copy of this with a signature on it?  
 15 A. No.  
 16 Q. Okay.  
 17 A. Those were just copies generated from the  
 18 computer of what I actually sent.  
 19 Q. These are copies generated from the  
 20 computer --  
 21 A. Yes.  
 22 Q. -- what you actually sent?  
 23 A. That's a reprint.  
 24 Q. Okay. So if somebody had signed this and  
 25 sent it back to you, would the computer have a record

Page 90

1 of that?

2 A. No.

3 Q. Okay. If somebody signed this and sent it

4 back, what happens to that form now?

5 A. It gets shredded.

6 Q. It gets shredded, okay. All right. Then I

7 don't have additional follow-up questions on that.

8 The rest of what's in this packet, so there's copies

9 of the renewal form. These are screen printouts from

10 the Eden system; is that correct?

11 A. Yes.

12 Q. And we all agree that they are very

13 difficult to read, so I will not scrutinize them

14 here.

15 The next part of the packet, these are all

16 deposit slips; is that correct?

17 A. Yes.

18 Q. And you said sometimes it's you that brings

19 in the deposit slip and sometime it's Janice?

20 A. Janice, correct.

21 Q. Okay. And when it says here "for activity

22 date," whoever write that here always writes the

23 quarter?

24 A. Correct.

25 Q. When was this -- did you write this here?

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1 A. Yes.

2 Q. And did you write it here while you were

3 making copies for us for the --

4 A. Yes.

5 Q. -- production?

6 Okay. So this is not a copy somewhere in

7 the office. What this is is a copy of the actual

8 slip? Let me rephrase that question. So this form

9 that you turned over, this copy that you turned over

10 to us that says "for activity date 4-1-17," that is

11 not a copy of a record where somebody wrote that,

12 this is a copy of this deposit slip and then you

13 wrote "activity date 4-1-17"?

14 A. Yes.

15 Q. Okay. And is that true for all of these

16 deposit slips?

17 A. Yes.

18 Q. Okay. So turning over to the Chicken Ranch

19 packet, which we will mark as Exhibit F.

20 (Thereupon Plaintiffs' Exhibit F

21 was marked for identification.)

22 MS. BRUCH: You've got two copies there.

23 BY MS. CAHILL:

24 Q. Okay. This is the Sheri's and this is the

25 Love Ranch. Oh, I see. Thank you very much.

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1 Okay. So this is for the Chicken Ranch, and

2 again it's your testimony today that this is a copy

3 that you generated from the computer today?

4 A. Correct.

5 Q. This is not a copy of anything that the

6 Chicken Ranch submitted?

7 A. Correct.

8 Q. And the deposit slips and the screen

9 printouts, this is all -- these are all documents

10 that you generated today in response to the motion

11 for discovery, or the order for discovery?

12 A. Okay.

13 MS. CAHILL: Do we have a copy of the,

14 second copy of this check?

15 MS. BRUCH: Yeah. I think this one is -- I

16 think this is both pages right there, because it was

17 a two-page document but you all took it apart.

18 MS. CAHILL: And you said that we had a copy

19 of this one?

20 MS. BRUCH: Yeah. I gave you two copies of

21 each thing.

22 BY MS. CAHILL:

23 Q. Yes. All right. I'm going to turn to the

24 Sheri's Ranch packet. This is going to be marked as

25 Exhibit G.

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1 (Thereupon Plaintiffs' Exhibit G

2 was marked for identification.)

3 BY MS. CAHILL:

4 Q. Okay. So this same -- this is the Sheri's

5 Ranch. Your testimony here is the same, that you

6 printed these renewal notices from the computer today

7 in response to the notice. These are not records

8 that you keep at the office?

9 A. Yes, that's right.

10 MS. CAHILL: Okay. And the last one will be

11 the Alien.

12 (Thereupon Plaintiffs' Exhibit H

13 was marked for identification.)

14 BY MS. CAHILL:

15 Q. We're marking this as Exhibit H, the Alien

16 Cathouse. Your testimony here is the same, there's

17 nothing different about how these copies were

18 generated? These were all produced today?

19 A. Correct.

20 MS. CAHILL: Okay. I don't have any other

21 questions. Do you have any follow-up, Marc?

22 MR. RANDAZZA: Can I go home?

23 MS. BRUCH: Do you mind, because I gave you

24 a two-page document and you've only marked one page

25 of it, but can we make sure that -- I just want the

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1 record to reflect that it was a two-page document.  
 2 So if you want to mark the whole thing with both  
 3 pages, and here's your second page.  
 4 MR. RANDAZZA: Yeah, I only felt like that  
 5 page was relevant, but I don't have any problem.  
 6 MS. BRUCH: I just want -- all I'm trying to  
 7 do is make sure there's a record of what I produced,  
 8 so wherever the top page is.  
 9 MS. CAHILL: So we'll go ahead and mark that  
 10 as Exhibit I, even though it's a little out of order.  
 11 So Exhibit I is a reflection of the other two checks.  
 12 (Thereupon Plaintiffs' Exhibit I  
 13 was marked for identification.)  
 14 MS. CAHILL: Okay. Any follow-up, Marc?  
 15 MR. RANDAZZA: No.  
 16 EXAMINATION  
 17 BY MS. BRUCH:  
 18 Q. I just want to clarify, and I apologize if  
 19 these are -- if these questions have already been  
 20 asked, but I just need to make sure I understand.  
 21 On July the 3rd you had a conversation --  
 22 you had an email exchange with Mr. Potter who's the  
 23 accountant for Love Ranch, correct?  
 24 A. Yes.  
 25 Q. And why is it that you contacted Mr. Potter

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1 by email?  
 2 A. Because while I was spot checking my license  
 3 payments, I noticed that I hadn't received his check  
 4 yet.  
 5 Q. Okay. So on July the 3rd you had not  
 6 received his check?  
 7 A. Yes.  
 8 Q. On July the 3rd, had you received the other  
 9 three checks?  
 10 A. Yes, because I had -- that's -- I was spot  
 11 checking them and I had them all.  
 12 Q. So you don't know if you got them before or  
 13 after 6-31, all you know is that on 7-3 you did not  
 14 have the Love Ranch check, but you had the others?  
 15 A. Yes.  
 16 MS. BRUCH: Okay. That's all I have.  
 17 EXAMINATION  
 18 BY MR. RANDAZZA:  
 19 Q. Did you have the others on the 2nd of July?  
 20 A. I'm not for sure, because I didn't even get  
 21 into the licensing system that day. I was tied up on  
 22 a project that -- and that's why I didn't get to it  
 23 until the 3rd or I probably would have called on, or  
 24 emailed him on the 2nd at that point.  
 25 Q. So for all you know they all came in on the

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1 morning of the 3rd?  
 2 A. No, they wouldn't have come the morning of  
 3 the 3rd because I already had them processed in the  
 4 computer --  
 5 Q. Okay.  
 6 A. -- when I was spot checking them.  
 7 Q. Okay.  
 8 A. So I would have already had them, and I  
 9 didn't get into the system on the 2nd.  
 10 Q. So all you know is ours was last but you  
 11 don't know if ours was the only one that was late?  
 12 A. As far as expiration date with being 6-30?  
 13 Q. If that's -- I guess we established earlier  
 14 that --  
 15 A. Right.  
 16 Q. -- we're not even sure what that date is --  
 17 A. Right.  
 18 Q. -- is that right?  
 19 A. Yeah.  
 20 Q. Okay.  
 21 A. So, yeah.  
 22 MS. CAHILL: So you don't know if you  
 23 received any on the 1st?  
 24 THE WITNESS: I don't, because it's a  
 25 weekend, so...

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1 MR. RANDAZZA: No further questions.  
 2 MS. CAHILL: Thank you.  
 3 MS. BRUCH: Thank you.  
 4 MR. RANDAZZA: Can we get a -- how  
 5 quickly -- we have a hearing tomorrow. It's probably  
 6 unrealistic to expect a transcript by tomorrow, or is  
 7 it?  
 8 MS. BRUCH: The answer to that is "yes."  
 9 (Discussion off the record.)  
 10 MR. RANDAZZA: Is it even physically  
 11 possible to get it overnight?  
 12 THE REPORTER: Yeah.  
 13 MR. RANDAZZA: Can we do that, please?  
 14 THE REPORTER: I can have it to you by  
 15 morning.  
 16 MR. RANDAZZA: Our hearing is at 10:00.  
 17 THE WITNESS: I probably need to change that  
 18 last question.  
 19 MS. BRUCH: Okay. Okay. Go ahead.  
 20 She wants to change her --  
 21 THE WITNESS: Because it's not going to  
 22 match with what I previously said. So the 30th is a  
 23 weekend. I wouldn't normally know if I got them, but  
 24 then the 2nd I didn't get in the system at all, and  
 25 I'm the only one processing the payments. So when I

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1 got it in there on the 3rd, they were all processed  
 2 already.  
 3 MR. RANDAZZA: Okay.  
 4 THE WITNESS: Prior to the 30th. So my  
 5 answer would be I can say I didn't get any on the  
 6 30th.  
 7 MS. BRUCH: So we're talking about -- I just  
 8 want to make sure we're all on the same page with  
 9 what days of the week. So we're talking about June  
 10 of 2018, right?  
 11 THE WITNESS: Uh-huh.  
 12 MS. BRUCH: Okay.  
 13 MR. RANDAZZA: So you mean none came on the  
 14 30th?  
 15 THE WITNESS: Right, because --  
 16 MS. BRUCH: That was a Saturday.  
 17 THE WITNESS: I had already had the three  
 18 brothel payments posted prior to me getting into the  
 19 system on the 3rd, 2nd being a Monday, and I did not  
 20 even get in the system on that Monday.  
 21 MR. RANDAZZA: And you're the only one who  
 22 puts the checks in?  
 23 THE WITNESS: Yes. Yeah. So and also I was  
 24 out on annual leave on the 29th, so I would have had  
 25 to process them even the day before that.

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1 MR. RANDAZZA: But you didn't keep a record  
 2 of that?  
 3 THE WITNESS: No.  
 4 MS. CAHILL: So nobody, when you're out,  
 5 nobody goes into the system and does the data entry?  
 6 THE WITNESS: No.  
 7 MS. CAHILL: So is it your testimony that  
 8 you -- when did you do the data entry for the checks  
 9 then?  
 10 THE WITNESS: I couldn't give you those  
 11 dates, because I just do them as they come in.  
 12 MS. CAHILL: Okay.  
 13 THE WITNESS: And I have -- I don't know  
 14 when they came in.  
 15 MS. CAHILL: Okay.  
 16 MS. BRUCH: Is there a way to know -- can  
 17 you go into your computer, like, I can go into Word  
 18 and it will show me the day that I created the  
 19 document. Will your computer, if you looked at it,  
 20 would it be able to tell you when you entered it?  
 21 THE WITNESS: Unfortunately, no.  
 22 MS. BRUCH: Okay. That would be too easy.  
 23 THE WITNESS: Right.  
 24 MR. RANDAZZA: So really -- so you don't  
 25 have, like, envelopes that come in, you stamp

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1 "received"?  
 2 THE WITNESS: I do not.  
 3 MR. RANDAZZA: So we have -- so it's your  
 4 testimony we have no record of when any of the checks  
 5 came in?  
 6 THE WITNESS: Correct.  
 7 MS. BRUCH: But can you clarify for me what  
 8 you just said about you were on annual leave the 29th  
 9 and that when you went in on the 3rd, all of that  
 10 data was entered?  
 11 MR. RANDAZZA: Objection. Who's testifying  
 12 here?  
 13 MS. BRUCH: Well, I'm asking.  
 14 Is that what you testified to?  
 15 THE WITNESS: Yes.  
 16 MS. BRUCH: So --  
 17 THE WITNESS: I just don't know which date  
 18 that I posted those three checks, but it would have  
 19 had to have been prior to the 29th.  
 20 MS. BRUCH: Okay. So prior -- so the  
 21 three -- okay. So I think what you just said is the  
 22 other three, not the Love Ranch check, you would have  
 23 had to have posted those prior to the 29th?  
 24 THE WITNESS: Correct.  
 25 MS. BRUCH: Because you didn't enter

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1 anything on the 2nd?  
 2 THE WITNESS: Correct.  
 3 MS. BRUCH: Okay.  
 4 THE WITNESS: And I was out of the office  
 5 the 29th, 30th, and the 1st.  
 6 MR. RANDAZZA: How do you know you didn't  
 7 enter anything on the 2nd?  
 8 THE WITNESS: Because I was tied up on a  
 9 project and I was actually waiting to get back in  
 10 there and spot check a bunch of my other licenses.  
 11 MS. BRUCH: Okay.  
 12 MR. RANDAZZA: Do you keep a record of when  
 13 you log in?  
 14 THE WITNESS: I don't. I don't know if  
 15 there is any way to find a log. Maybe the company  
 16 might be able to.  
 17 MR. RANDAZZA: All right. Thank you.  
 18 MS. BRUCH: Thank you. And I'll take the  
 19 original for signature. My email address is on my  
 20 card, so when you send out the transcript in the  
 21 morning, if you would email it to me that would be  
 22 great.  
 23 THE REPORTER: Okay. So you want expedite  
 24 also?  
 25 MS. BRUCH: Well, I need the transcript.



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1 Yes, please.

2 THE REPORTER: That concludes the deposition

3 proceedings. Transcript review by the witness will

4 be facilitated by the assistance of Ms. Bruch who has

5 assumed responsibility for handling the transcript

6 review process.

7 Any exhibit marked during the proceedings

8 will be attached to the original deposition

9 transcript, with copies attached to transcripts

10 timely ordered by counsel.

11 (Thereupon the taking of the

12 deposition was concluded at

13 5:37 p.m.)

14 \* \* \* \* \*

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1 CERTIFICATE OF REPORTER

2 STATE OF NEVADA )

3 SS:

4 COUNTY OF CLARK )

5

6 I, Deborah Ann Hines, RPR, Nevada CCR No. 473,

7 California CSR No. 11691, Certified Court Reporter,

8 certify:

9 That I reported the taking of the deposition

10 of the witness, Callie Stark, commencing on Tuesday,

11 August 21, 2018, at 2:52 p.m.;

12 That prior to being examined, the witness

13 was by me duly sworn to testify to the truth, the

14 whole truth, and nothing but the truth;

15 That I thereafter transcribed my shorthand

16 notes into typewriting and that the typewritten

17 transcript of said deposition is a complete, true and

18 accurate record of testimony provided by the witness

19 at said time to the best of my ability;

20 I further certify (1) that I am not a

21 relative, employee or independent contractor of

22 counsel of any of the parties; nor a relative,

23 employee or independent contractor of the parties

24 involved in said action; nor a person financially

25 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

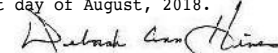
questioned; and (2) that transcript review pursuant

to FRCP 30(e) was requested.

IN WITNESS WHEREOF, I have hereunto set my

hand in my office in the County of Clark, State of

Nevada, this 21st day of August, 2018.



Deborah Ann Hines, CCR #473, RPR

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1 CERTIFICATE OF DEPONENT

2 PAGE LINE CHANGE REASON

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15 \* \* \* \* \*

16 I, Callie Stark, deponent herein, do hereby

17 certify and declare the within and foregoing

18 transcription to be my deposition in said action

19 under penalty of perjury; that I have read, corrected

20 and do hereby affix my signature to said deposition.

21 \_\_\_\_\_

22 Callie Stark, Deponent

23 \_\_\_\_\_

24 Date

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