

FILED
November 17, 2025
State of Nevada
EMRB
3:14 p.m.

1 JEFFREY F. ALLEN, ESQ.
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4 Henderson, NV 89052
5 Phone: (702) 595-1127
6 Email: jeffreyfallen@aol.com

7 Attorney for Petitioner,
8 Water Reclamation District Employees Association

9 STATE OF NEVADA
10 GOVERNMENT EMPLOYEE-MANAGEMENT
11 RELATIONS BOARD

12 * * * *

13 WATER RECLAMATION DISTRICT
14 EMPLOYEES ASSOCIATION

15 Petitioner,

16 vs.

17 CLARK COUNTY WATER
18 RECLAMATION DISTRICT and SERVICE
19 EMPLOYEES INTERNATIONAL UNION,
20 LOCAL #1107,

21 Respondents.

22 CASE NO.: 2025-025

23 PETITION FOR WITHDRAWAL OF
24 RECOGNITION OF SEIU 1107 AS
25 THE EXCLUSIVE BARGAINING
26 AGENT FOR SUPERVISORY
27 EMPLOYEES OF THE CLARK
28 COUNTY WATER RECLAMATION
DISTRICT

29 COMES NOW, Water Reclamation District Employees Association ("WRDEA"), by and
30 through its counsel, Jeffrey F. Allen, Esq., and for its Petition for Withdrawal of Recognition of
31 SEIU 1107 as the Exclusive Bargaining Agent for Supervisory Employees of the Clark County
32 Water Reclamation District ("CCWRD"), alleges as follows:

33 1. At all relevant times herein, Petitioner WRDEA was and is a Nevada non-profit
34 corporation, authorized and doing business in the County of Clark, State of Nevada and is an
35 employee organization within the meaning of NRS §288.040.

36 2. At all times relevant herein, the CCRWD was and is a local government employer
37 within the meaning of NRS §288.060.

SEIU (Respondent)

Answer

FILED
December 9, 2025
State of Nevada
E.M.R.B.
4:27 p.m.

1 **CHRISTENSEN JAMES & MARTIN, CHTD.**
2 **EVAN L. JAMES, ESQ. (7760)**
3 **DYLAN J. LAWTER, ESQ. (15947)**
4 **7440 W. Sahara Avenue**
5 **Las Vegas, Nevada 89117**
6 **Telephone: (702) 255-1718**
7 **Facsimile: (702) 255-0871**
8 **Email: elj@cjmlv.com, djl@cjmlv.com**
9 **Attorneys for Local 1107**

6 **STATE OF NEVADA**
7 **GOVERNMENT EMPLOYEE-MANAGEMENT**
8 **RELATIONS BOARD**

9 **WATER RECLAMATION DISTRICT**
10 **EMPLOYEES ASSOCIATION**

CASE NO.: 2025-25

11 **Petitioner,**

12 **vs.**

13 **CLARK COUNTY WATER**
14 **RECLAMATION DISTRICT and SERVICE**
15 **EMPLOYEES INTERNATIONAL UNION,**
16 **LOCAL 1107,**

17 **Respondents.**

18 **ANSWER**

19 The Nevada Service Employees Union, SEIU Local 1107 ("Local 1107" or
20 "Union"), by and through its counsel of record, Christensen James & Martin, Chtd.,
21 hereby answers the Petition filed by the Water Reclamation District Employees
22 Association ("Association").

- 23 1. In answering Paragraph 1, Local 1107 denies the allegations thereof.
- 24 2. In answering Paragraph 2, Local 1107 admits the allegations thereof.
- 25 3. In answering Paragraph 3, Local 1107 admits that its proper name is
26 Nevada Service Employees Union and that it sometimes identifies itself as Service
27 Employees International Union, Local 1107.
4. In answering Paragraph 4, Local 1107 admits the allegations thereof.

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- 7. For an order directing WRD to do the following:
 - a. Post notices of its violations in conspicuous places in its facilities,
 - b. Post notices of the Association’s violations in conspicuous places in its facilities,
 - c. Send notice(s) to employees detailing its violations,
 - d. Send notice(s) to employees detailing the Association’s violations, and
 - e. Have the notices and statements read aloud to employees during meetings.

- 8. For such other relief deemed just and proper.

DATED this 9th day of December 2025.

CHRISTENSEN JAMES & MARTIN, CHTD.

By: /s/ Dylan J. Lawter
Dylan J. Lawter, Esq.
Nevada Bar No. 15947
7440 W. Sahara Avenue
Las Vegas, NV 89117
Attorneys for Local 1107

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on December 9, 2025, I caused a true and correct copy of the
3 foregoing Answer to be filed via email, as follows:

4 Employee-Management Relations Board
5 emrb@business.nv.gov

6 I hereby certify that on December 9, 2025, I served a true and correct copy of the
7 foregoing Complaint on the Petitioner and the Clark County Water Reclamation District
8 via certified mail, return receipt requested, to the following:

9 Water Reclamation District Employees Association
10 Jeffery F. Allen, Esq.
11 2941 Camelo Drive
Henderson, NV 89051

12 Clark County Water Reclamation District
13 5857 East Flamingo Road
Las Vegas, NV 89122

14 **CHRISTENSEN JAMES & MARTIN, CHTD.**

15 By: /s/ Natalie Larson
16 Natalie Larson

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CCWRD (Respondent)

Response to Petition for Withdrawal

FISHER & PHILLIPS LLP
300 S Fourth Street, Suite 1500
Las Vegas, Nevada 89101

FILED
December 11, 2025
State of Nevada
E.M.R.B.
3:05 p.m.

1 **FISHER & PHILLIPS LLP**
2 **MARK J. RICCIARDI, ESQ.**
3 **Nevada Bar No. 3141**
4 **300 South Fourth Street, Suite 1500**
5 **Las Vegas, NV 89101**
6 **Telephone: (702) 252-3131**
7 **Facsimile: (702) 252-7411**
8 **E-Mail Address: mr Ricciardi@fisherphillips.com**
9 **Attorneys for Respondent Clark County Water Reclamation District**

10 **STATE OF NEVADA**

11 **EMPLOYEE-MANAGEMENT RELATIONS BOARD**

12 **WATER RECLAMATION DISTRICT**) **Case No.: 2025-025**
13 **EMPLOYEES ASSOCIATION**)
14)
15 **Petitioner,**)
16)
17 **vs.**) **CLARK COUNTY WATER**
18) **RECLAMATION DISTRICT'S**
19) **RESPONSE TO PETITION FOR**
20) **WITHDRAWAL**
21 **CLARK COUNTY WATER**)
22 **RECLAMATION DISTRICT and SERVICE**)
23 **EMPLOYEES INTERNATIONAL UNION,**)
24 **LOCAL #1107,**)
25)
26 **Respondents.**)

27 **CLARK COUNTY WATER RECLAMATION DISTRICT'S RESPONSE TO**
28 **PETITION FOR WITHDRAWAL**

Respondent, the Clark County Water Reclamation District ("CCWRD" or the "Respondent"), by and through its counsel of record, Mark J. Ricciardi, Esq. of the law offices of Fisher & Phillips LLP, hereby responds to the Water Reclamation District Employees Association's ("WRDEA") November 17, 2025, Petition for Withdrawal of Recognition of SEIU 1107 as the Exclusive Bargaining Agent for Supervisory Employees of the Clark County Water Reclamation District ("Petition") on file herein as follows:

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1 **STATEMENT OF PARTIES AND JURISDICTION**

2 1. Answering Paragraph 1 of the Petition, CCWRD is with without
3 sufficient information and knowledge to form a belief as to the truth or falsity of the
4 allegations, which has the effect of a denial.

5 2. Answering Paragraph 2 of the Petition, CCWRD admits the allegations.

6 3. Answering Paragraph 3 of the Petition, CCWRD admits the allegations.

7 4. Answering Paragraph 4 of the Petition, CCWRD admits the allegations.

8 5. Answering Paragraph 5 of the Petition, CCWRD admits the allegations.

9 6. Answering Paragraph 6 of the Petition, CCWRD is with without
10 sufficient information and knowledge to form a belief as to the truth or falsity of the
11 allegations, which has the effect of a denial.

12 7. Answering Paragraph 7 of the Petition, CCWRD is with without
13 sufficient information and knowledge to form a belief as to the truth or falsity of the
14 allegations, which has the effect of a denial.

15 8. Answering Paragraph 8 of the Petition, CCWRD admits the allegations.

16 **FIRST CAUSE OF ACTION**

17 **(Petition for Withdrawal of SEIU 1107 as Bargaining Agent for Supervisory**
18 **Employees of CCWRD)**

19 9. Answering Paragraph 9 of the Petition, CCWRD reallege its prior
20 answers as if fully set forth at this point.

21 10. Answering Paragraph 10 of the Petition, CCWRD admits the
22 allegations.

23 11. Answering Paragraph 11 of the Petition, CCWRD is with without
24 sufficient information and knowledge to form a belief as to the truth or falsity of the
25 allegations, which has the effect of a denial.

26 12. Answering Paragraph 12 of the Petition, CCWRD is without sufficient
27 information and knowledge to form a belief as to the truth or falsity of the allegations,
28 which has the effect of a denial.

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FISHER & PHILLIPS LLP
300 S Fourth Street, Suite 1500
Las Vegas, Nevada 89101

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WHEREFORE, having answered all the allegations contained in the Petition
CCWRD prays for relief as follows:

1. Based on the proofs presented by Petitioner and SEIU Local 1107, the EMRB should decide, whether by an election or without an election (as determined by the EMRB), whether SEIU Local 1107 has ceased to be supported by a majority of the supervisory employees in the bargaining unit.
2. That CCWRD be awarded its costs and reasonable attorneys' fees in defending this action.
3. For any other relief that the Board deems just and appropriate.

DATED this 11th day of December 2025.

FISHER & PHILLIPS, LLP

/s Mark J. Ricciardi, Esq.
MARK J. RICCIARDI, ESQ.
300 South Fourth Street
Suite 1500
Las Vegas, Nevada 89101
*Attorneys for Respondent Clark County
Water Reclamation District*

FISHER & PHILLIPS LLP
300 S Fourth Street, Suite 1500
Las Vegas, Nevada 89101

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CERTIFICATE OF ELECTRONIC SERVICE

This is to certify that on the 11th day of December 2025, the undersigned, an employee of Fisher & Phillips LLP, electronically served the foregoing **CLARK COUNTY WATER RECLAMATION DISTRICT'S RESPONSE TO PETITION TO WITHDRAW** to EMRB (emrb@business.nv.gov) and the following:

JEFFREY F. ALLEN, ESQ.
2941 Carmelo Drive
Henderson, NV 89052
jeffreyfallen@aol.com

By: /s/ Sarah Griffin
An employee of Fisher & Phillips LLP