

BEFORE THE NEVADA EMPLOYEE-MANAGEMENT RELATIONS BOARD
STATE OF NEVADA

In re: **Case No. 2026-001**
CO Talal Akkad, Charging Party

v.

Las Vegas Police Protective Association (LVPPA), Respondent

UNFAIR LABOR PRACTICE COMPLAINT
(NRS 288.270 – Duty of Fair Representation)

I. PARTIES

1. Charging Party, CO Talal Akkad, is a corrections officer employed by a local government employer in the State of Nevada and is part of a bargaining unit represented by Respondent.

2. Respondent, Las Vegas Police Protective Association (LVPPA), is an employee organization within the meaning of NRS 288.040.

II. JURISDICTION

3. This Complaint is brought pursuant to NRS 288.270 and NRS 288.280.

III. STATEMENT OF FACTS

4. On or about December 1, 2025, Charging Party submitted an application for membership in LVPPA.

5. On or about December 20, 2025, Charging Party received written notice that his membership was denied with no explanation.

6. The denial provided no reason, rule, or appeal process.

IV. UNFAIR LABOR PRACTICES

7. Respondent acted arbitrarily and in bad faith, violating its duty of fair representation under NRS 288.270.

V. RELIEF REQUESTED

8. Charging Party requests findings, cease-and-desist orders, disclosure of criteria, reconsideration, and any just relief.

VI. RESERVATION OF RIGHTS

9. Charging Party reserves all legal rights and remedies.



CO Talal Akkad
Charging Party

Date: ~~01/05/2026~~

LVPPA (Respondent)

Answer to Complaint

FILED
January 28, 2026
State of Nevada
E.M.R.B.
3:13 p.m.

1 David Roger, Esq.
Nevada State Bar No. 2781
2 Las Vegas Police Protective Association
9330 W. Lake Mead Blvd., Ste. 200
3 Las Vegas, NV 89134
(702) 384-8692
4 *Attorney for Complainants*

5
6 **GOVERNMENT EMPLOYEE-MANAGEMENT RELATIONS BOARD**
7 **STATE OF NEVADA**

8
9 CO Talal Akkad

Case No.: 2026-001

10 Complainant,

ANSWER TO COMPLAINT

11 vs.

12 LAS VEGAS POLICE PROTECTIVE
13 ASSOCIATION, 9330 W. Lake Mead Blvd.,
Ste. 200, Las Vegas, NV 89134

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15 Respondent.

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19 COMES NOW Respondent the LAS VEGAS POLICE PROTECTIVE ASSOCIATION,
20 by and through its attorney of record, David Roger, Esq. hereby files this ANSWER TO
21 COMPLAINT. This answer is made and based upon the attached Memorandum of Points and
22 Authorities, all papers and pleadings on file herein, and any oral argument allowed at the time of
23 the hearing
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DATED this 28th day of January 2026.

LAS VEGAS POLICE PROTECTIVE ASSOC.

By: David Roger

David Roger, Esq.
Nevada State Bar No. 2781
Las Vegas Police Protective Association
9330 W. Lake Mead Blvd., Ste. 200
Las Vegas, NV 89134
(702) 384-8692
Attorney for Respondent

ANSWER TO COMPLAINT

1. In answering paragraphs 1 through 2 and 4-6 of the complaint, the respondent admits the allegations.
2. In their answer to paragraph 3, respondents deny that the Board has jurisdiction to hear this matter. The remainder of the paragraph does not require admission or a denial.
3. In answering paragraph 7, the respondent denies the allegations.
4. In answering paragraphs 8-9, the allegations do not require admission or a denial.
5. Any allegations that are not responded to are expressly denied.

AFFIRMATIVE DEFENSES

1. The Complainant fails to state a claim upon which relief can be granted.
2. The Board lacks jurisdiction to address this complaint.
3. Respondent did not engage in any prohibited practice.
4. Pursuant to NRCP 11, as amended, not all possible affirmative defenses may have been included because sufficient facts were not available after a reasonable inquiry when filing

1 this Answer to the Complainant's Complaint. Therefore, Respondent reserves the right to
2 amend its answer to add additional affirmative defenses if subsequent investigations
3 justify it.
4

5 **REQUESTED RELIEF**

6 Respondent requests that the Board order the following:

- 7 1. That the instant complaint be dismissed with prejudice and that the Complainant be denied
8 any relief.
9 2. That the respondent be awarded attorney fees and litigation costs.
10 3. Any other relief the Board considers appropriate.
11

12 LAS VEGAS POLICE PROTECTIVE
13 ASSOCIATION

14
15 David Roger

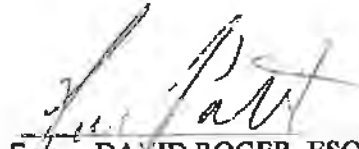
16
17 DAVID ROGER, ESQ.
18 Nevada Bar No. 2781
19 LAS VEGAS POLICE
20 PROTECTIVE ASSOCIATION
21 9330 West Lake Mead Boulevard, Suite 200
22 Las Vegas, Nevada 89134
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CERTIFICATE OF MAILING

The undersigned hereby certifies that on the 26 day of January, 2026 a copy of the above **ANSWER TO COMPLAINT** was placed in an envelope with postage affixed thereto then sealed and deposited with the U. S. Postal Service for first-class Postage fully prepaid, and addressed to:

Talal Akkad
7067 Alabaster Peak Street
Las Vegas, NV 89166


For: **DAVID ROGER, ESQ.**
Nevada Bar No. 2781
**LAS VEGAS POLICE
PROTECTIVE ASSOCIATION**
9330 West Lake Mead Boulevard, Suite 200
Las Vegas, Nevada 89134
*Attorneys for Defendant Las Vegas Police
Protective Association*

LVPPA (Respondent)

Motion to Dismiss

FILED
January 27, 2026
State of Nevada
E.M.R.B.
4:01 p.m.

1 **MOT**
David Roger, Esq.
2 Nevada State Bar No. 2781
Las Vegas Police Protective Association
3 9330 W. Lake Mead Blvd., Ste. 200
Las Vegas, NV 89134
4 (702) 384-8692
(702) 824-2261 - fax
5 *Attorney for Complainants*

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

9
10 Talal Akkad

Case No.: 2026-001

11 Complainant,

12 vs.

**RESPONDENT LAS VEGAS POLICE
PROTECTIVE ASSOCIATION'S
MOTION TO DISMISS.**

13 **LAS VEGAS POLICE PROTECTIVE**
14 **ASSOCIATION, 9330 W. Lake Mead Blvd.,**
15 **Ste. 200, Las Vegas, NV 89134**

16 Respondent.
17
18

19 **COMES NOW** Respondent the LAS VEGAS POLICE PROTECTIVE ASSOCIATION,
20 by and through its attorney of record, David Roger, Esq. hereby files this Motion to Dismiss. This
21 Motion is made and based upon the attached Memorandum of Points and Authorities, all papers
22 and pleadings on file herein, and any oral argument allowed at the time of the hearing
23

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27
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1 DATED this 27 day of January 2026.

2 LAS VEGAS POLICE PROTECTIVE ASSOC.

3 By: David Roger

4 David Roger, Esq.
5 Nevada State Bar No. 2781
6 Las Vegas Police Protective Association
7 9330 W. Lake Mead Blvd., Ste. 200
8 Las Vegas, NV 89134
9 (702) 384-8692
10 Attorney for Respondent

11 **POINTS AND AUTHORITIES**

12 NAC 288.375(1) states that the Board may dismiss a complaint if there is a lack of
13 probable cause to support the complainant's allegations. The complainant claims the Las Vegas
14 Police Protective Association violated the duty of fair representation by refusing to accept his
15 application for membership.


16 The duty of fair representation requires an association to make decisions for its members
17 that are not arbitrary, discriminatory, or in bad faith. *John Strahan v. Washoe County Sheriffs'*
18 *Supervisory Deputies Association*, Item No. 544D, EMRB Case No. A1-045767 (February 1,
19 2006); *Kristie Billings and Molly Brown v. SEIU Local 1107*, Item No. 751, Case No. A1-046002
20 (May 2, 2012); *Thomas Richards v. Police Managers and Supervisors Association*, Item No. 788,
21 EMRB Case No. A1-046094 (August 19, 2013);

22 Likewise, the Board has refused to interfere in the internal affairs of a union matter. *IAFF,*
23 *Local 1883 v. City of Henderson*, Item No. 239, EMRB Case No. A1-045455 (February 23, 1990).
24 In *Triner, Dukestan, et al. v. AFT #2170, et al.*, Item No. 41, EMRB Case No. A1-045289 (July
25 18, 1975), the Board stated, "There is no provision in Chapter 288 which indicates that we possess
26 the jurisdiction to rule upon the internal functioning of a local government employee organization
27 ..."

1 The immediate complaint should be dismissed because it does not establish probable
2 cause that the Association violated its duty of fair representation by denying the complainant
3 membership. The obligation of fair representation applies to association members. The statutory
4 obligation does not extend to non-members, nor does the Act require an association to accept
5 individuals as members in an association.

6 The Board has generally avoided involving itself in the internal affairs of an employee
7 organization. This case concerns an association exercising its right to deny membership to an
8 individual. Since the complainant has not alleged a recognizable violation under the statute, the
9 complaint should be dismissed.

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12 LAS VEGAS POLICE PROTECTIVE
ASSOCIATION

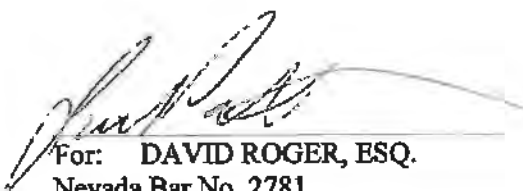
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14 
15 DAVID ROGER, ESQ.
16 Nevada Bar No. 2781
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CERTIFICATE OF MAILING

The undersigned hereby certifies that on the 27 day of January, 2026 a copy of the above MOTION TO DISMISS was placed in an envelope with postage affixed thereto then sealed and deposited with the U. S. Postal Service for first-class Postage fully prepaid, and addressed to:

Talal Akkad
7067 Alabaster Peak Street
Las Vegas, NV 89166


For: DAVID ROGER, ESQ.
Nevada Bar No. 2781
LAS VEGAS POLICE
PROTECTIVE ASSOCIATION
9330 West Lake Mead Boulevard, Suite 200
Las Vegas, Nevada 89134
*Attorneys for Defendant Las Vegas Police
Protective Association*