

**BEFORE THE NEVADA ~~XCOA~~ GOVERNMENT EMPLOYEE-MANAGEMENT RELATIONS BOARD**

**STATE OF NEVADA**

**Daniel Wallace, an individual,**  
Complainant,

**Case No.: 2026-005**

v.

**RENO POLICE PROTECTIVE ASSOCIATION (RPPA),**  
an employee organization,  
Respondent.

**COMPLAINT FOR BREACH OF DUTY OF FAIR REPRESENTATION**

**I. INTRODUCTION**

1. Complainant, Daniel Wallace, by and through himself, files this Complaint against Respondent Reno Police Protective Association (“RPPA” or “Union”) for breach of its Duty of Fair Representation under NRS Chapter 288.
2. As the exclusive bargaining representative, RPPA owed Complainant a duty to represent him fairly, in good faith, and without discrimination in matters relating to his grievance and arbitration.
3. RPPA breached this duty by acting in a manner that was arbitrary, discriminatory, and in bad faith, including misrepresenting Complainant’s actions, failing to investigate and present material evidence, and treating Complainant differently than similarly situated members.

**II. JURISDICTION**

4. This Complaint is brought pursuant to NRS 288.270 and related provisions governing prohibited practices by employee organizations.
5. The Nevada Employee-Management Relations Board has jurisdiction over this matter.
6. This Complaint is timely filed within six (6) months of the conduct giving rise to this action.

**III. GENERAL ALLEGATIONS**

7. At all relevant times, Complainant was an employee within a bargaining unit represented by RPPA.

8. RPPA was the exclusive bargaining representative responsible for representing Complainant in grievance and arbitration matters.
9. RPPA owed Complainant a duty to act fairly, in good faith, and without discrimination.
10. RPPA had a duty to investigate, process, and advocate meritorious grievances on behalf of Complainant.

## **IV. FACTUAL ALLEGATIONS**

11. Complainant was subject to disciplinary action and sought representation and assistance from RPPA.
12. Complainant made multiple efforts to communicate and meet with RPPA representatives regarding his case.
13. RPPA falsely represented that Complainant was “unwilling to meet,” despite Complainant’s repeated attempts to engage and available text message evidence demonstrating otherwise.
14. RPPA failed to adequately investigate Complainant’s grievance.
15. RPPA failed to meaningfully process or pursue Complainant’s grievance.
16. RPPA imposed improper and unreasonable conditions on representation, including requiring “new information” before reconsidering support for arbitration.
17. RPPA failed to provide clear explanations for its decisions and failed to advocate on Complainant’s behalf.
18. RPPA was aware of potential credibility issues involving key decision-makers connected to Complainant’s discipline, including concerns regarding truthfulness in internal investigations.
19. Upon information and belief, RPPA communicated to members that it was waiting for a court determination before utilizing such credibility-related issues in future cases.
20. Despite the relevance of such credibility concerns, RPPA failed to investigate, raise, or utilize this information in Complainant’s case.
21. Upon information and belief, RPPA preserved or intended to use similar credibility-related information for the benefit of other members, but not for Complainant.
22. RPPA treated Complainant differently than similarly situated members without a rational basis.
23. A member of RPPA’s governing body engaged in conduct involving the use of a racial slur, raising concerns regarding discriminatory bias.

## **V. FIRST CAUSE OF ACTION**

### **(Arbitrary Conduct – Breach of Duty of Fair Representation)**

24. Complainant realleges and incorporates paragraphs 1 through 23.
25. RPPA acted arbitrarily by:
  - a. Failing to properly investigate Complainant’s grievance;
  - b. Failing to perform basic procedural duties;
  - c. Failing to utilize or investigate relevant credibility-related evidence;
  - d. Imposing irrational conditions for representation;
  - e. Failing to meaningfully pursue a meritorious grievance.
26. RPPA’s conduct falls outside the range of reasonable union conduct and constitutes arbitrary action.

## **VI. SECOND CAUSE OF ACTION**

### **(Discriminatory Conduct – Breach of Duty of Fair Representation)**

27. Complainant realleges and incorporates paragraphs 1 through 26.
28. RPPA engaged in discriminatory conduct by:

- a. Treating Complainant differently than similarly situated members;
- b. Applying its representation inconsistently;
- c. Preserving favorable evidence for other members but not Complainant;
- d. Operating in an environment where discriminatory conduct occurred.

29. RPPA's actions constitute unlawful discrimination under NRS 288.270.

## **VII. THIRD CAUSE OF ACTION**

### **(Bad Faith Conduct – Breach of Duty of Fair Representation)**

30. Complainant realleges and incorporates paragraphs 1 through 29.
31. RPPA acted in bad faith by:

- a. Falsely representing that Complainant was unwilling to meet;
- b. Mischaracterizing Complainant's conduct;
- c. Knowingly failing to utilize relevant credibility evidence;
- d. Indicating such evidence would be reserved for other cases;
- e. Engaging in dishonest and misleading conduct.

32. RPPA's actions constitute bad faith and deceitful conduct.

## **VIII. DAMAGES**

33. As a direct result of RPPA's conduct, Complainant suffered:

- a. Loss of employment;
- b. Loss of wages and benefits;
- c. Loss of a fair opportunity to challenge discipline;
- d. Emotional and professional harm.

## **IX. PRAYER FOR RELIEF**

WHEREFORE, Complainant requests:

1. A finding that RPPA breached its Duty of Fair Representation;
2. An order requiring RPPA to cease and desist;
3. An order requiring RPPA to properly process and support Complainant's grievance;
4. Back pay and lost earnings;
5. Costs and attorney's fees;
6. Any other relief deemed just and proper.

## **X. VERIFICATION**

I, Daniel Wallace, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

DATED this 9<sup>th</sup> day of April 2026.

Daniel Wallace

**RPPA (Respondent)**

**Answer**

FILED  
May 18, 2026  
State of Nevada  
E.M.R.B.  
12:00 p.m.

1 Ronald J. Dreher  
2 NV Bar No. 15726  
3 DREHER LAW  
4 P.O. Box 6494  
5 Reno, NV 89513  
6 Telephone: (775) 846-9804  
7 ron@dreherlaw.net  
8 *Attorney for Respondent*

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

12 DANIEL WALLACE,

Case No.: 2026-005

13 Complainant,

Panel:

14 vs.

15 RENO POLICE PROTECTIVE  
16 ASSOCIATION,

Respondent.

17 **ANSWER**

18 **COMES NOW**, Respondent RENO POLICE PROTECTIVE ASSOCIATION and hereby  
19 answers Complainant DANIEL WALLACE'S Complaint as follows:

20 **I. INTRODUCTION**

21 1. Answering Paragraph 1 of the Complaint, Respondent objects to the allegations  
22 therein on the basis they state legal conclusions to which no response is required. To the extent a  
23 response is required, Respondent denies each and every allegation set forth in said Paragraph.  
24

25 2. Answering Paragraph 2 of the Complaint, Respondent objects to the allegations  
26 therein on the basis they state legal conclusions to which no response is required. To the extent a  
27 response is required, Respondent denies each and every allegation set forth in said Paragraph.  
28

1           3.       Answering Paragraph 3 of the Complaint, Respondent objects to the allegations  
2           therein on the basis they state legal conclusions to which no response is required. To the extent a  
3           response is required, Respondent denies each and every allegation set forth in said Paragraph.

4           **II. JURISDICTION**

5           4.       Answering Paragraph 4 of the Complaint, Respondent objects to the allegations  
6           therein on the basis they state legal conclusions to which no response is required. To the extent a  
7           response is required, Respondent denies each and every allegation set forth in said Paragraph.  
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9           5.       Answering Paragraph 5 of the Complaint, Respondent objects to the allegations  
10          therein on the basis they state legal conclusions to which no response is required. To the extent a  
11          response is required, Respondent denies each and every allegation set forth in said Paragraph.

12          6.       Answering Paragraph 6 of the Complaint, Respondent is without sufficient  
13          information or knowledge to form a belief as to the truth or falsity of each of the allegations set forth  
14          in said Paragraph, and on that basis deny the same.  
15

16          **III. GENERAL ALLEGATIONS**

17          7.       Answering Paragraph 7 of the Complaint, Respondent objects to the allegations  
18          therein on the basis they state legal conclusions to which no response is required. To the extent a  
19          response is required, Respondent denies each and every allegation set forth in said Paragraph.

20          8.       Answering Paragraph 8 of the Complaint, Respondent objects to the allegations  
21          therein on the basis they state legal conclusions to which no response is required. To the extent a  
22          response is required, Respondent denies each and every allegation set forth in said Paragraph.  
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24          9.       Answering Paragraph 9 of the Complaint, Respondent objects to the allegations  
25          therein on the basis they state legal conclusions to which no response is required. To the extent a  
26          response is required, Respondent denies each and every allegation set forth in said Paragraph.  
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1           20.     Answering Paragraph 20 of the Complaint, Respondent denies each and every  
2 allegation set forth in said Paragraph.

3           21.     Answering Paragraph 21 of the Complaint, Respondent denies each and every  
4 allegation set forth in said Paragraph.

5           22.     Answering Paragraph 22 of the Complaint, Respondent denies each and every  
6 allegation set forth in said Paragraph.

7           23.     Answering Paragraph 23 of the Complaint, Respondent objects to the allegations  
8 therein on the basis they state legal conclusions to which no response is required. To the extent a  
9 response is required, Respondent denies each and every allegation set forth in said Paragraph.  
10

11           **V. FIRST CAUSE OF ACTION**

12           24.     Answering Paragraph 24 of the Complaint, Respondent objects to the allegations  
13 therein on the basis they state legal conclusions to which no response is required. To the extent a  
14 response is required, Respondent denies each and every allegation set forth in said Paragraph.  
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16           25.     Answering Paragraph 25(a-e) of the Complaint, Respondent denies each and every  
17 allegation set forth in said Paragraph.

18           26.     Answering Paragraph 26 of the Complaint, Respondent objects to the allegations  
19 therein on the basis they state legal conclusions to which no response is required. To the extent a  
20 response is required, Respondent denies each and every allegation set forth in said Paragraph.  
21

22           **VI. SECOND CAUSE OF ACTION**

23           27.     Answering Paragraph 27 of the Complaint, Respondent objects to the allegations  
24 therein on the basis they state legal conclusions to which no response is required. To the extent a  
25 response is required, Respondent denies each and every allegation set forth in said Paragraph.

26           28.     Answering Paragraph 28(a-d) of the Complaint, Respondent denies each and every  
27 allegation set forth in said Paragraph.  
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1           29.     Answering Paragraph 29 of the Complaint, Respondent objects to the allegations  
2     therein on the basis they state legal conclusions to which no response is required. To the extent a  
3     response is required, Respondent denies each and every allegation set forth in said Paragraph.

4                   **VII. THIRD CAUSE OF ACTION**

5           30.     Answering Paragraph 30 of the Complaint, Respondent objects to the allegations  
6     therein on the basis they state legal conclusions to which no response is required. To the extent a  
7     response is required, Respondent denies each and every allegation set forth in said Paragraph.

8           31.     Answering Paragraph 31(a-e) of the Complaint, Respondent denies each and every  
9     allegation set forth in said Paragraph.

10          32.     Answering Paragraph 32 of the Complaint, Respondent objects to the allegations  
11     therein on the basis they state legal conclusions to which no response is required. To the extent a  
12     response is required, Respondent denies each and every allegation set forth in said Paragraph.

13                   **VIII. DAMAGES**

14          33.     Answering Paragraph 33(a-d) of the Complaint, Respondent is without sufficient  
15     information or knowledge to form a belief as to the truth or falsity of each of the allegations set forth  
16     in said Paragraph. Respondent objects to the allegations therein on the basis they state legal  
17     conclusions to which no response is required. To the extent a response is required, Respondent  
18     denies each and every allegation set forth in said Paragraph.

19                   **IX. PRAYER FOR RELIEF**

20          Respondent denies the allegations therein contained in the Prayer for Relief in  
21     Complainant's Complaint to the extent they are asserted against Respondent, and further denies  
22     complainant is entitled to any damages, interest, punitive damages, attorney's fees and costs or any  
23     other relief.  
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1 Answer to Complainant's Complaint to allege additional affirmative defenses, if subsequent  
2 investigation so warrants.

3 WHEREFORE, Respondent prays that Complainant takes nothing by reason of his  
4 Complaint, that it be dismissed with prejudice, and that Respondent be awarded its costs of suit,  
5 reasonable attorney's fees, and any other and further relief that the Board deems appropriate.  
6

7 Dated this 18<sup>th</sup> day of May, 2026.

8 /s/ Ronald J. Dreher  
9 Ronald J. Dreher  
10 NV Bar No. 15726  
11 DREHER LAW  
12 P.O. Box 6494  
13 Reno, NV 89513  
14 Telephone: (775) 846-9804  
15 ron@dreherlaw.net  
16 *Attorney for Respondent*  
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**CERTIFICATE OF SERVICE**

Pursuant to NAC 288.070, the undersigned hereby certifies that I am the counsel for the Reno Police Protective Association and that on this date I served a true and correct copy of the preceding document addressed to the following:

Daniel Wallace  
7127 Beacon Dr.  
Reno, NV 89506  
djwallace1@att.net

by electronic service by transmitting the copy electronically as an attachment to electronic mail in portable document format.

DATED this 18th day of May, 2026.

/s/ Ronald J. Dreher  
Ronald J. Dreher  
NV Bar No. 15726  
DREHER LAW  
P.O. Box 6494  
Reno, NV 89513  
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*Attorney for Respondent*

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**CERTIFICATE OF SERVICE**

Pursuant to NAC 288.070, the undersigned hereby certifies that I am the counsel for the Reno Police Protective Association and that on this date I served a true and correct copy of the preceding document addressed to the following:

Marisu Abellar  
Commissioner, EMRB  
3300 W. Sahara Avenue  
Suite 260  
Las Vegas, NV 89102  
MAbellar@business.nv.gov

by electronic service by transmitting the copy electronically as an attachment to electronic mail in portable document format.

DATED this 18<sup>th</sup> day of May, 2026.

/s/ Ronald J. Dreher  
Ronald J. Dreher  
NV Bar No. 15726  
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P.O. Box 6494  
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*Attorney for Respondent*