

**STATION GVR ACQUISITION, LLC D/B/A GREEN
VALLEY RANCH RESORT SPA CASINO**

and

**LOCAL JOINT EXECUTIVE BOARD OF LAS VEGAS
AFFILIATED WITH UNITE HERE
INTERNATIONAL UNION**

Case No. 28-RC-208266

EMPLOYER'S OBJECTIONS TO ELECTION

Pursuant to Rule 102.69 of the Rules and Regulations of the National Labor Relations Board, Station GVR Acquisition, LLC d/b/a Green Valley Ranch Resort Spa Casinos (“Employer”) hereby presents the following Objections to the conduct of the representation election held on November 8-9, 2017 in the above-captioned matter.

1. The Local Joint Executive Board of Las Vegas affiliated with UNITE HERE International Union (“Union”) prepared “Election Day Sign Up Sheets” containing names and contact information taken from the list of eligible voters; distributed the Sheets to its agents; and instructed the agents to direct bargaining unit employees that they must “sign up” to vote on a specified date and time, and that they must vote “Yes” for the Union. This interfered with employees’ rights to refrain from voting, was intimidating and coercive, destroyed the requirement that their vote be in-secret, voluntary, or anonymous, and demonstrated that the Union was monitoring whether they voted.

2. The Union’s agents escorted groups of eligible voters to the voting room, interfering with their right to choose to refrain from voting, was intimidating and coercive, destroyed the requirement that their vote be in-secret, voluntary, and anonymous, and demonstrated that the Union was monitoring whether they voted.

3. The Union's agents escorted voters to the voting room one-at-a-time, and departed only after the voter entered the voting room, interfering with their right to choose to refrain from voting, was intimidating and coercive, destroyed the requirement that their vote be in-secret, voluntary, and anonymous, and demonstrated that the Union was monitoring whether they voted.

4. The Union's agents directed and instructed bargaining unit employees to show their marked ballots to the Union's Observers, to "prove" how they voted. On multiple occasions, voters entered the ballot booth, exited the booth with their ballots in hand, and walked towards the Union's Observer, and not the ballot box. A Board agent directed the voters to deposit the ballots in the ballot box, and commented he had not seen such unusual conduct prior to the election in the above-captioned matter.

5. The Union's agents directed voters to wear Union buttons when voting.

6. The Union's agents patrolled the hall immediately adjacent to the voting room in the "no electioneering" area and frequently looked inside, maintaining an intimidating physical presence around the voting room and demonstrating that the Union was monitoring who had voted in the election, was intimidating and coercive, destroyed the requirement that their vote be in-secret, voluntary, or anonymous, and demonstrated that the Union was monitoring whether they voted. This happened on multiple occasions; on at least one occasion a Board agent exited the voting room as the individual quickly departed the "no electioneering" area ahead of the Board agent; and on at least one other occasion a Board agent confronted an individual and directed the individual to depart from the "no electioneering" area.

7. The Union's agent instructed voters waiting outside of the voting room where to stand and when to enter the voting room, creating the impression that the Union agent controlled the voting process.

8. The Union's agents maintained a list of who had voted, thereby interfering with employees' rights to refrain from voting, was intimidating and coercive, destroyed the requirement that their vote be in-secret, voluntary, or anonymous, demonstrated the Union was monitoring whether they voted, and created an intimidating and coercive atmosphere.

9. On several occasions, voters openly carried cell phones into the voting room and voting booths, but were not instructed by a Board agent that the use of such devices was restricted, creating the impression amongst voters that their voting activities were being monitored and recorded, and enabling voter fraud, coercion and intimidation.

10. On at least two occasions, voters lingered and conversed near the ballot box and/or beverage station, creating the impression amongst voters that their voting activities were being monitored, and enabling voter coercion and intimidation.

11. An appropriate flow of voters was not maintained, resulting in rushed and unreliable verifications of voter eligibility.

12. An Observer was permitted to serve after the Observer asked that a Board agent read the ballot to her, indicating that the purported Observer was illiterate or suffered vision problems, and was designated as an Observer for purposes of intimidating voters.

WHEREFORE, Employer Station GVR Acquisition, LLC d/b/a Green Valley Ranch Resort Spa Casino requests that the results of the election in the above-captioned matter be set aside and declared null and void, because of the objectionable conduct, as set forth above, which rendered

it impossible to conduct a free and fair election as required by law. The mutual obligation of the Union and the Employer to refrain from objectionable conduct associated with the conduct of the election was repeatedly and outrageously violated by the Union, to the detriment of bargaining unit employees.

Respectfully Submitted,

Date: November 14, 2017

/s/ Harriet Lipkin

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CERTIFICATE OF SERVICE

I hereby certify this 14th day of November, 2017, that a copy of the Employer's

Objections were electronically served on:

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