



March 28, 2023

Nevada Humane Society
2825 Longley Lane
Suite B
Reno, NV 89502

Attention: Members of the Board of Directors

Kris Wells (kris.wells@att.com); Rita Eissmann; Stephanie Berggren; Paula Thompson; Stephen Festa; Raymond Gonzalez (ray.gonzalez@wfadvisors.com), Nancy Wenzel; Brittany Cooper (brittany@brittanycooperlaw.com); Jay Schuerman; Max Margulies (max@renoaces.com); Robert Kirchman

Dear Members of the Board of Directors,

RE: Slander of Real World Canine and its owners by NHS senior staff

It has recently come to our attention that senior members of NHS staff, David Smith and Amber Grey, have been spreading unconscionable, unfounded and malicious lies attacking me, my wife, and the company we own, Real World Canine.

There are three slanderous statements from your staff members, Mr Smith and Ms Grey, that I would like to address in this letter:

1. We, (my wife and I) have “swastika stickers” on our cars.
2. We were “rejected” from adopting a dog by NHS, and used someone else to adopt the dog for us, and are abusing that dog.
3. RWC does not treat its customers’ dogs well.

Slanderous Statement #1: Needless to say, there are no “swastika stickers” to be found on any of our three vehicles. I cannot begin to tell you how outraged we are that Mr. Smith and Ms. Grey would state that we have any association with the Nazi party or its symbols on our vehicles; insinuating that we are Nazi sympathizers at best, and Nazis at worst. This is a personal attack by NHS senior staff members, that borders on a hate crime. As well-educated people, we are very aware of the tens of thousands of homosexuals who were murdered by the Nazis during World War II. To associate us with an organization that has murdered people (like us!) based on who they love is beyond slanderous and shows a level of malice that is unworthy of any representative of a charitable organization, especially senior staff members. My wife and I own several companies. One of them is an engineering firm that works for the Department of Defense (DoD). The work that we do for the DoD is Top Secret, my wife and I each have Top Secret security clearances, and have had those



clearances for at least 30 years in my wife's case, and almost 10 years in mine. To receive this level of clearance, our entire financial, social, and personal lives are routinely scrutinized by the Defense Security Service. If we were Nazis, we would not have our current security clearances. NHS senior staff's accusation that we are associated with the Nazi party is not only unfounded, it borders on criminal.

Slandorous Statement #2: The accusation that my wife and I have ever been denied adoption is completely fabricated. This story could only have been generated from within NHS, and could easily have been debunked by NHS records. We have NEVER been rejected for pet adoption by NHS or any other organization. I ask that you pull our records from NHS and verify that this spiteful slander is completely fabricated. It is concerning that NHS senior staff members would not even bother to look through their own records before making this slanderous statement to others. Quite frankly, this action indicates an extreme level of hostility and animus harbored by your staff, Mr. Smith and Ms. Grey, against us and/or our company. Neither I nor my wife have ever met Mr. Smith or Ms. Grey. We cannot tell them from Adam or Eve. We cannot imagine why they would feel the need to attack and besmirch us personally, and wonder who stands to benefit from them spreading slanderous lies against us.

Slandorous Statement #3: The accusation that RWC's treatment of our customers' dogs is anything short of exceptional is completely false. RWC has the lowest dog to handler ratio of all licensed dog daycare facilities in Reno. We have treadmills and a 30 ft pool that dogs swim in with a life guard present. Our boarding dogs are monitored 24/7 and are never left alone, in case an accident happens. We have a permitted 7,000 sq ft outside turf area that dogs can use for exercise and play. Our staff love and cherish the dogs under their care. Most importantly, we have the most loyal customer base of any dog daycare facility in Reno. At least 90% of our new customers come to us through word-of-mouth from a current customer, and we have 5 new customers every week. As I mentioned in the previous paragraph, neither I nor my wife have ever met Mr Smith or Ms Grey. Neither of them has ever been to our facility, or had discussions with our managers about the facility and how we operate. For NHS senior staff to make slanderous statements about RWC without a shred of evidence, shows a complete lack of ethics and a total disregard for professional behavior. In my humble opinion, this extremely corrupt behavior is unworthy of a staff member put into a position of power to represent NHS.

It is unclear how many people Mr. Smith and Ms. Grey have slandered us to, or if any other NHS staff member has also engaged in slander against us. We are aware of their actions because a loyal customer of ours, who is also a volunteer at NHS, Cindy Hansen, heard those slanderous statements, and approached us to verify the veracity of the claims. As a customer, she was concerned that those statements might be true. She was told that the aforementioned accusations were purportedly



based on something a former employee of RWC said. If this is true, then NHS is guilty of hiring people into positions of responsibility, who are willing to repeat salacious statements from disgruntled former employees, without any attempt to verify the facts. The unethical behavior displayed by Mr. Smith and Ms. Grey is so breathtakingly brazen, that I must question if ethical standards of behavior are completely absent at the NHS, such that these two employees believe that they can engage, without consequence, in salacious rumor-mongering and naked animus perpetrated under the protective cloak of NHS' name, against people whom they do not know, who actively support the dog community in Reno, and who have supported the NHS in the past and very recently.

We have been long time supporters of your organization, including:

- We adopted a dog with congenital heart issues (named Kona by NHS) in 2016. Because she had heart issues, we were informed that she would get free veterinary care for the remainder of her life. We informed Kimberly Wade (with whom we arranged the adoption) at the time that NHS had better things to do with their time and money and we paid for her care for the remainder of her life.
- We adopted another dog from NHS in 2017 at the annual gala who is living her best life with us. Obviously, we attend fundraising galas and donate money at such events.
- Over the last 7 years, we have made personal donations of \$4355 to NHS, including purchasing a table for our RWC staff to this year's Bubbles and Buddies Champagne Brunch. We also make monthly contributions to the HSUS, Humane Society of the United States, to work on legislative changes to improve the lives of all animals.
- This past Christmas, RWC collected dog supplies and held a raffle for free day camp packages to raise money for the NHS and SPCA. We raised \$607.50 in donation for each organization. We also collected beds, food, and toys to benefit NHS.
- Lastly, we made a provision in our will for the NHS to receive 10% of our estate (>\$500,000 value currently), upon our demise. A copy of the relevant page is attached.

It is with great sorrow and disappointment that we find ourselves at this juncture, where the actions of NHS representatives Mr. Smith and Ms. Grey have demonstrated the unworthiness of NHS to receive any future support from us. I am writing to you to bring this matter to your attention, as it is the responsibility of the NHS governance to ensure the ethical behavior of all of its staff members, to whom they have given authority to speak and act on behalf of the NHS. Additionally, as there have been egregious personal attacks levied against us by senior staff members of NHS, I must insist that I receive a written response to this letter from the Board. In your response, I would like to know:



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1. What actions will be taken against Mr. Smith and Ms. Grey, for their unethical and slanderous actions?
 2. If they were repeating unfounded information from a former RWC employee, we want the name of the person, as we may take legal action against them.
 3. What actions will NHS take to address the fact that there are likely other persons that have heard NHS representatives spreading unfounded rumors about us personally, and RWC, that is detrimental to our reputations personally, and to our business?
 4. What will NHS do to ensure that such unprofessional, unethical, and maliciously hostile behavior never happens again?

It is not my intent to harm NHS as an organization. As can be seen, we have been staunch supporters of the NHS. This is why I am giving you, the Board, an opportunity to rectify the actions of two rogue senior staff members. However, if nothing is done to assure me that this is not a systemic NHS problem, I reserve the right to publicly disseminate the aforementioned events that occurred. We have many customers, business colleagues, and friends who are also donors to NHS, who would be outraged by your representatives' repugnant actions against us. I also reserve the right to file suit against the NHS, and against Mr Smith and Ms Grey, personally, for slander.

Yours Sincerely,

Jodie Wang

Jodie Wang
Owner/CEO
Real World Canine



Jodie Wang, Owner/CEO
Real World Canine
1355 N. McCarran Blvd.
Reno, NV 89512

Dear Jodie,

Thank you for giving us the opportunity to investigate and respond to your letter regarding Nevada Humane Society. Late in February, a volunteer (Cindy) participated in a discussion between two employees (Amber and Kait) related to a potential partner, Real World Canine. Staff and the volunteer were looking at having Real World Canine possibly assist an NHS dog named Punchy and perhaps establishing an ongoing relationship between NHS and Real World Canine.

The discussion involved staff recall of a guy in shorts who had a swastika tattoo on his calf, possible stickers on his car, and who they believed had been denied adoption by NHS at some point. The context of the conversation was whether or not the person being discussed worked for or had any affiliation with your business. During their discussion and upon researching NHS records, they determined that the person they were thinking of had nothing to do with Real World Canine or any individuals involved in the business. Upon determining that this was a case of mistaken identity, both employees felt comfortable recommending that we pursue the vetting process with Real World Canine as a potential NHS partner.

Amber exchanged e-mails with you on March 15 indicating that we would like to make another site visit and explained that we would have to create an SOP (standard operating procedure) and speak to upper management to determine if anything else was needed to move this forward. I believe that you responded on March 19 and I don't believe that NHS has responded to that message. Unfortunately, staff has been shorthanded due to the season and an untimely death of a team member. In addition, the dog in question, Punchy, was adopted out on March 22. NHS does have a number of partners we are currently evaluating in addition to your business and the process does not always move quickly.

There was no defamation, slander or unethical behavior from our employees or any intent to harm you or your business. This was simply a business discussion in a private office between two employees and a volunteer. The mistaken identity was cleared in the moment and that was the end of the discussion.

Had there been any concerns about your character or business, there would not have been a recommendation to move forward with the vetting process. Even if the two employees felt that there was a character issue or if they had concerns with your business, they don't have the authority to deny or approve a potential partner and further research and approval of upper-level management would still have been required.



As requested, the answers to the four questions you asked are below:

1. The employees involved were interviewed and asked to provide written statements regarding their recall of the conversation that took place five weeks prior to receiving your complaint. After interviewing both the employees and the volunteer, it is clear that no unethical or slanderous actions were taken or intended. Unfortunately, this was a sensitive conversation about a past incident but it was quickly determined that the person in question was not associated with your company. The conversation took place outside of a public area and the only person we are aware of who discussed this outside of the meeting was the volunteer. All employees and volunteers are bound by confidentiality agreements signed when they undertake employment or volunteer service.
2. The conversation that day determined that you or your business were not associated with the person in question. There would have been no further discussion about you or your business with respect to him.
3. The conversation in question took place and was resolved with NHS staff that same day. If there was any further conversation regarding this individual, it would not have involved you or your business name.
4. As noted above, the NHS CEO interviewed the employees and volunteer involved. As a result of the complaint, employee guidelines have been updated to direct the employee to speak only to the CEO if they have any question or concern about moral character or fitness of another employee, potential adopter, partner or supplier. The employee guidebook and volunteer handbook already addressed the restriction regarding sharing private conversations at NHS regarding partners or individuals.

I apologize that the details shared with you may have been incomplete or misunderstood and I sincerely apologize for the distress this has caused you and your wife. We value your past support and hope that we can find common ground and move forward. We recently filled a key vacancy for an Animal Care Director, Staci, and she and our CEO, Greg, would like to attend the next site visit if you are still willing to pursue the partnership. I think you may have met Staci at the Heels & Hounds event last weekend.

Again, we appreciate the opportunity to address your concerns. We always try to do right by the animals in our care and those who support our lifesaving mission.

Sincerely,

Kris Wells
President of Board of Directors

Subject: Re: Letter of Complaint against the Nevada Humane Society
Date: Wednesday, April 19, 2023 at 9:00:21 PM Pacific Daylight Time
From: Jodie Wang
To: kris.wells@att.com

Hi Kris,

I received your response today. I am concerned that you would send me a response with multiple factual inaccuracies in it. It saddens me to know that the Board of Directors at NHS is unable, or unwilling, to perform its responsibility as an oversight organization for NHS management. It is obvious that you have simply taken the word of NHS CEO Greg Hall, who has a vested interest in maintaining the status quo, and does not want to admit to not having an ethics policy enforced within NHS. It seems to me that the Board did not even put in the minimal effort of talking to the people involved in the slander against us.

You may be willing to take Mr Hall's word for it that Ms Grey and Mr Smith did not slander us, but we are not so willing. We do not think that people who commit slander will willingly admit to their boss, that they committed slander.

I am offering to pay for all parties involved (Mr Hall, Ms Grey, Mr Smith and Ms Hansen) to take a lie detector test administered by a professional organization that is certified by the federal government. My wife Angela has had to take them several times for her security clearance, and they are highly accurate. Ms Hansen has already agreed to take the test. If, as you say, Ms Grey and Mr Smith did not make those accusations against us, a lie detector test will verify this fact and this matter will be resolved.

If the lie detector test verifies that NHS employees are lying, or if they are unwilling to take a lie detector test, I will be releasing the following to the public:

- Your letter and evidence of its false statements;
- The results of all individuals' lie detector test results, or just Ms Hansen's test results and NHS employees' refusal to take the test;
- Evidence that the Board did not investigate this issue or talk to people involved;
- Information that I have received about NHS employees that undercut their credibility.

I will give you till Monday (April 24) to verify if the NHS staff involved are willing to take the lie detector test.

Thank you.

Jodie Wang
Owner/CEO
Real World Canine
~ For happy, well-balanced dogs

Subject: Re: Allegations against the Nevada Humane Society
Date: Monday, April 24, 2023 at 11:17:34 AM Pacific Daylight Time
From: Jodie Wang
To: Bailey, Linda
CC: Tennert, John, Fairbank, Micheline
Attachments: 0.png, 1.png, 2.png, 3.png

From: Bailey, Linda <lbailey@fennemorelaw.com>
Date: Monday, April 24, 2023 at 10:52 AM
To: Jodie Wang <Jodie.Wang@rwc-nv.com>
Cc: Tennert, John <jtennert@fennemorelaw.com>, Fairbank, Micheline <MFairbank@fennemorelaw.com>
Subject: Re: Allegations against the Nevada Humane Society

Ms. Wang,
Please see the attached letter regarding your allegations against the Nevada Humane Society. A physical copy was also mailed to you today via the United States Postal Service.

Thank You,
Linda Bailey

Linda S. Bailey
Legal Administrative Assistant

FENNEMORE.

7800 Rancharrah Parkway, Reno, NV 89511

T: 775.788.2221

lbailey@fennemorelaw.com

Legal Administrative Assistant to:

Micheline N. Fairbank, Shannon S. Pierce, MaryJo E. Smart

FENNEMORE

Micheline Nadeau Fairbank
Of Counsel
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7800 Rancharrah Parkway,
Reno, Nevada 89511
PH (775) 788-2210 | FX (775) 786-1177
fennemorelaw.com

April 24, 2023

VIA EMAIL: jodie.wang@rwc-nv.com

VIA USPS:
Jodie Wang
Real World Canine L.L.C.
1355 N. McCarran Blvd.
Reno, NV 89512

Re: Allegations against the Nevada Humane Society

Dear Ms. Wang:

The purpose of this letter is to demand that Real World Canine L.L.C. (“RWC”), you and your agents cease and desist from engaging in any defamatory conduct against the Nevada Humane Society (“NHS”) and its employees and volunteers. If you proceed to engage in any conduct, as threatened in your April 19, 2023, email to Kris Wells that harms the reputation and good will of the community as it relates to NHS, NHS reserves its right to pursue all available legal remedies against RWC, its members and agents.

I. Background

On March 28, 2023, you sent a letter to the NHS Board of Directors where you made allegations of slanderous conduct by NHS employees against RWC and its owners. Specifically, you alleged three slanderous statements were made by NHS employees. Your letter outlined the specific facts and circumstances that you heard, second hand, regarding an alleged discussion between those staff members. These alleged statements were relayed to you by a volunteer of the NHS. Your March 28th letter further requested responses to four questions – the actions that would be taken against the NHS employees for their conduct; if the discussion did pertain to a former RWC employee, the identity of the individual; the actions NHS would take since it was likely others heard the conversation; and, the actions NHS would take to preclude such actions taking place again in the future.

In response to your March 28th letter, the NHS took your concerns with the utmost sensitivity and immediately commenced an internal investigation to determine what had occurred, the circumstances surrounding the occurrence, the specific information relating to the alleged statements, and to determine what, if any, further action the NHS should take with respect to the circumstances, including discipline of any involved employee.

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Jodie Wang
April 24, 2023
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Following NHS's internal investigation, on April 14, 2023, Kris Wells, President of the NHS Board of Directors responded to your March 28th letter. In that letter, Ms. Wells provided you with a summary of the investigation, including findings that the individual of concern had no affiliation with RWC or any individual involved in the business. As a result, Ms. Wells conveyed to you that RWC was recommended to be pursued as a potential NHS partner. In fact, following the discussion of concern, NHS staff contacted you to advance pursuing the potential NHS partnership, and you responded to that email.

It was further conveyed to you that as a part of the internal investigation conducted by NHS, it was determined that the discussion in question occurred in a private office, that there was a mistaken identity that was immediately resolved and recognized not to have any affiliation with RWC or its owners. The April 14th letter reiterated that if NHS staff, who were involved in the subject discussion, had any concern regarding the appropriateness of partnering with RWC, they would not have recommended proceeding with pursuing a partnership with RWC.

Pursuant to your request, Ms. Wells provided substantive responses to your four questions, including the finding that no additional discussions regarding RWC occurred and that provisions contained within NHS's employee guidebook and volunteer handbook prohibited sharing of private information. Those prohibitions were addressed with the subject employees.

Despite the prompt action by NHS, it's leadership and the timely response addressing your concerns, and clearly outlining the fact that the discussion did not have any adverse inference against you or RWC, you found this response to be unsatisfactory. On April 19, 2023, by email, you assert that NHS's response was untruthful and that NHS leadership and employees have deliberately failed to appropriately investigate or respond to your concerns. The April 19th email also demands that NHS employees take a lie detector test and if NHS and/or its employees fail to cede to your demands, you threaten conduct for the purpose of harming the reputation, business relationships, and community standing of NHS and its employees.

II. Cease and Desist Demand

The April 19th email is a threat to disseminate false information without merit or substantiation for the purpose of deliberately harming the reputation of the NHS.

A. Polygraph Demand

Polygraphs, otherwise known as lie detector tests, are an unreliable measure of ascertaining whether a person is being truthful in responding to questions. *American Elevator Co. v. Briscoe*, 93 Nev. 655, 671, 572 P.2d 534, 538 (1977). There is no legal basis to demand that any person submit to a polygraph. Furthermore, the results of a polygraph or the fact that a person agreed or declined to submit to a polygraph is inadmissible evidence in Nevada courts. *Tiffany B. v. Slay*, No. 50419, 2009 WL 3426639, at *1 (Nev. Oct. 21, 2009)(The Nevada Supreme Court has not

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Jodie Wang
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acknowledged polygraph examinations admissible under Nevada law); *see also American Elevator*, 93 Nev. At 671, 572 P.2d at 538, *Corbett v. State*, 94 Nev. 643, 644-45, 584 P.2nd 704-05 (1978).

There is neither a rational basis to support your demand to compel any NHS employee to take a polygraph nor any legal basis to demand such action by the NHS or its employees. As such, no employee or other member of the NHS will submit to your baseless demand.

B. Defamation

Under Nevada law, a defamatory act is where a false and defamatory statement is published to a third party where there is at a minimum negligent conduct and where the defamed party sustains actual or presumed damages. *PETA v. Bobby Berosini, Ltd.*, 111 Nev. 615, 619, 895 P.2d 1269, 1272 (1995)(quoting the Restatement (Second) of Torts: Elements Stated § 558 (1977)). “A statement is defamatory when it would tend to lower the subject in the estimation of the community, excite derogatory opinions about the subject, and hold the subject up to contempt.” *K-Mart Corporation v. Washington*, 109 Nev. 1180, 1191, 866 P.2d 274, 281–82 (1993).

The allegations of wrongful conduct set forth in your March 28th letter and April 19th email have not been substantiated. In fact, after a diligent investigation on the part of NHS, the claims of slanderous activity by NHS staff was found not to be substantiated. Rather, the discussion was whether a certain person, who NHS had previously determined to be ineligible for adoption, was associated with your business. In that closed door meeting between NHS staff and a volunteer, which was not published to a third-party, it was promptly determined that the individual of concern **was not** associated with your business. Further evidencing that there was no harm or injury to you or your business is the fact that those involved specifically recommended continuing to pursue the partnership between NHS and RWC.

Your assertion that NHS employees, including the Chief Executive Officer and the NHS Board of Directors, have failed to act is false and without substantiation. You have been provided an overview of the actions taken to determine whether the accusations of your March 28th letter were true and then to determine the appropriate response. There has been no improper conduct on the part of NHS.

However, the threats contained in your April 19th email, if you proceed to disseminate such statements, constitute defamation on your part. If RWC and anyone associated with RWC releases the false information contained in your April 19th email, including:

1. Making any verbal or written statement claiming that the April 14th letter from Ms. Wells contains false statements;
2. Imputing wrongful conduct on the part of NHS or its employees for refusing to submit to a lie detector test;

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Jodie Wang
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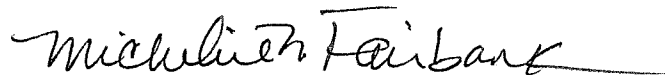
3. Claim that the NHS Board of Directors or any employee failed to investigate or communicate with the parties involved; or,
4. Make any verbal or written statement regarding the NHS or its employees that negatively impacts the reputation and good will of the NHS in the community,

the NHS will pursue all legal remedies allowed under the law to assure to protect the reputation of the organization, its employees and the Board of Directors.

If you have any questions or concerns regarding this matter, the communications in questions and the actions taken by NHS, please direct those inquiries to me.

Sincerely,

FENNEMORE CRAIG, P.C.



Micheline Nadeau Fairbank

MFAI

cc: Gregory J. Hall, Chief Executive Officer
Kris A. Wells, President, Board of Directors

Jodie Wang

From: Jodie Wang
Sent: Monday, April 24, 2023 11:18 AM
To: Bailey, Linda
Cc: Tennert, John; Fairbank, Micheline
Subject: Re: Allegations against the Nevada Humane Society

Dear Ms Bailey,

Thank you for your letter. We understand that many people use “Cease and Desist” letters as a bullying tactic. For your information, it will neither alter nor deter our actions. We have proof that the information sent to us by Kris Wells in her response contained multiple falsehoods and narratives. In addition, truth is a solid defense against charges of defamation. We look forward to your legal action to encourage more visibility and discovery into the inner workings of NHS.

Jodie
Jodie Wang
Owner/CEO
Real World Canine
~ For happy, well-balanced dogs

From: Bailey, Linda <lbailey@fennemorelaw.com>
Date: Monday, April 24, 2023 at 10:52 AM
To: Jodie Wang <Jodie.Wang@rwc-nv.com>
Cc: Tennert, John <jtennert@fennemorelaw.com>, Fairbank, Micheline <MFairbank@fennemorelaw.com>
Subject: Re: Allegations against the Nevada Humane Society

Ms. Wang,
Please see the attached letter regarding your allegations against the Nevada Humane Society. A physical copy was also mailed to you today via the United States Postal Service.

Thank You,
Linda Bailey

Linda S. Bailey
Legal Administrative Assistant

FENNEMORE.

7800 Rancharrah Parkway, Reno, NV 89511
T: 775.788.2221

lbailey@fennemorelaw.com

Legal Administrative Assistant to:
Micheline N. Fairbank, Shannon S. Pierce, MaryJo E. Smart



CONFIDENTIALITY NOTICE: The information contained in this message may be protected by the attorney-client privilege. If you believe that it has been sent to you in error, do not read it. Please immediately reply to the sender that you have received the message in error. Then delete it. Thank you.

April 22nd, 2023

Dear Kris,

I have been forwarded the letter you sent to Jodie in response to the letter she sent to you on March 28th, 2023. I feel the need to reply to your letter, because quite frankly, the information in it is inaccurate and outright false. I was the person in the room with Kaitlin and Amber during the entire discussion about RWC. I was the person in Greg's office during a 2 hour 11 minutes and 8 seconds long conversation, where I told Greg what was said about RWC's owners. I know how long it was because I have the recording. I do not know why Greg chose to ignore my account of the events, but the account that you provided in your response is not what I told Greg, far from it.

I asked Greg if I could record our meeting because I wanted to have a record of what was said. He gave his full permission. I asked to record the meeting because I did not want to have a he-said-she-said situation, about what was said and discussions. I do not intend to summarize my meeting with Greg in this letter. Suffice to say, everything that I am telling you in this letter was told to Greg in that meeting.

I have chosen to address the inaccuracies in your letter point by point, as they occur in the letter.

Your first paragraph: "Late in February, a volunteer (Cindy) participated in a discussion between two employees (Amber and Kait) related to a potential partner, Real World Canine. Staff and the volunteer were looking at having Real World Canine possibly assist an NHS dog named Punchy and perhaps establishing an ongoing relationship between NHS and Real World Canine."

The date of said conversation was February 24th, 2023. Kaitlin and myself were having the conversation that consisted of these key points:

1. At this time Punchy would not be able to go up to RWC because in reporting her findings to NHS higher ups there were two issues:
 - a. The use of e-collars - NHS as an organization did not condone the use of them – Kait's words: That's a hard no.
 - b. No barking - Amber disagreed with this. Kait's words: Amber says this is the way dogs communicate.

Amber came in during our conversation and just stood there on the other side of the partition. She only engaged when I explained to her use of E-collars was up to the owner, and RWC would abide by their wishes.

I also explained dogs up at RWC or anywhere for that matter communicate just fine without barking and asked her if she preferred and thought the frenzied, anxiety filled aggressive barking out in the pods was dogs communicating in a friendly or healthy manner? And wasn't she the one who always says to her dog staff: Click for quiet?

At this point, I'd like to point out that Amber has a history of being combative when someone disagrees with her. Greg stated as such during our recorded meeting, and informed me that he

is working with her on this issue. I would also like to point out that Amber has two “tells” when she is trying to recover from someone that has a reasonable response that counters her point:

1. Her eyes start darting back and forth
2. She comes up with completely out of left field statements that are always negative

After I countered these 2 points, Amber made the following statements about RWC.

Amber: A former employee of RWC who came to work at NHS, but no longer works here, said the owners have swastikas on the back of their vehicle

My Response: I just followed them home last night when I left RWC from picking up Lumi, I can assure you there were no swastikas on the back of their vehicle, but I will make it my priority to find out Tuesday when I take Lumi to RWC to go to school.

NOTE: There was NO mention of a man in shorts with a swastika on his calf. This was a complete fabrication. The first time I heard of such a thing was when I was talking to Greg and he told me that is what Amber and David told him. I immediately informed Greg that a man in shorts was never mentioned.

Amber: The owners tried to adopt a dog from NHS last summer and couldn't so they had someone else adopt it for them, and we were told they are abusing it.

My Response: I know their dog, Kaitlin you saw it, it is clearly not being abused. Why would they need someone else to adopt it for them? What dog are you referring to?

Amber: Nico.

My response: Nico? My Nico? I know exactly which dog you are talking about, I walked him every single day while he was here, and I can tell you Nico is not their dog. I started describing Nico and yes, Amber's eyes started darting back and forth. I asked Kaitlin to look him up, she did and as I knew, it was the Nico that I walked, and Kaitlin said the person who adopted him was a lady from Carson.

Amber: We've heard RWC doesn't treat the dogs well.

My response: Kaitlin, you were up there, you saw all the dogs, did any of them act like they aren't treated well? Amber, we could hardly walk because of the pack of dogs surrounding us and especially Angela, they followed her like a pack of lap dogs.

At this point, Amber again displayed her tell, eyes darting back and forth. Then she said:

Amber: Well, actually it was David who put two and two together.

I could almost audibly hear the big bump, and see the hair flying up, as Amber desperately threw David under the bus to win an argument.

This is the conversation that happened. This is the conversation that I discussed with Jodie. This is the conversation that I told Greg about. My points in reciting the above conversation to you are:

1. This is not the conversation that you relayed in your response to Jodie. I do not know if Amber or Kaitlin told Greg the tale that ended up in your response, but I know for sure

(and have recorded proof) that the above account of the conversation is what I told Greg and he/you chose to ignore it.

2. Of all parties involved in the conversation, I am the only one with nothing to gain or lose by telling the truth about what was said. I do not draw a salary from NHS, so I have no financial ties that would make me want to lie about events. I was not trying to avoid any additional work. I am not the one who said things that weren't true, and now need to change the narrative. The same cannot be said for the others involved in the conversation. I have agreed to take a lie detector test to demonstrate that I am telling the truth.

I would also like to add, that Kaitlin and Amber both knew I intended to speak to RWC owners about what was said because **I told them I would for the following reasons.**

1 – My Lumi goes to school at RWC and if there were any truth to any of it (and I knew there wasn't), then it would behoove me to find out.

2 - Punchy, I was very fond of (still am), and was doing everything in my power to get him up to RWC. And again, if there were any truth to any of it (and I knew there wasn't), then it would behoove me to find out.

3 - Angela and Jodie had **that very day** told Kaitlin and I that they would start with Punchy, but were already wanting to expand their offer to 3-4 more dogs. So yet again, if there were any truth to any of it (and I knew there wasn't), then it would behoove me to find out.

Your second paragraph: "The discussion involved staff recall of a guy in shorts who had a swastika tattoo on his calf, possible stickers on his car, and who they believed had been denied adoption by NHS at some point. The context of the conversation was whether or not the person being discussed worked for or had any affiliation with your business. During their discussion and upon researching NHS records, they determined that the person they were thinking of had nothing to do with Real World Canine or any individuals involved in the business. Upon determining that this was a case of mistaken identity, both employees felt comfortable recommending that we pursue the vetting process with Real World Canine as a potential NHS partner."

Let me say emphatically that "a guy in shorts" was NEVER mentioned, discussed, or hinted at, much less "A guy in shorts who had a swastika tattoo on his calf, possible stickers on his car and who they believed had been denied adoption by NHS at some point. The context of the conversation was whether or not the person being discussed worked for or had any affiliation with your business." On this point I want to be perfectly clear:

1. Amber said swastikas on the vehicles of owners of RWC.
2. Amber said RWC owners were denied adoption.

I find it hard to believe that any reasonable person would hear such a thing and not ask follow-up questions. What was the reason that Amber and David would believe that the "guy in shorts" worked at RWC? By their own admission, neither have ever been there, so they couldn't have had first hand knowledge of who worked there. Did the person fill out a form stating that they worked at RWC? In which case most reasonable people would want to see the form, as it

bolsters this rather shaky and unbelievable statement. There must be some reason why this “guy in shorts with swastika tattoo on his calf” was connected to RWC in David/Amber’s mind. Or did they think this “guy in shorts” was either Jodie or Angela in disguise? Given the extreme nature of this individual, there must have been a good reason for the initial connection. Why wouldn’t you or Greg provide the basis for Amber/David’s assumption that this individual was connected to RWC in your letter? Surely, reasonable people would want to understand how that connection was made? Your lack of transparency, and casual mentioning of this “guy in shorts” seems more suspicious because you provide no reasonable basis for the assertion that there might have been a connection.

You state “during their discussion and upon researching NHS records, they determined that the person they were thinking of had nothing to do with Real World Canine or any individuals involved in the business” – Again, this was never discussed.

You state that NHS records were used to determine this person did not work at RWC. What records were reviewed? Did Amber or Kaitlin call the individual during the discussion and confirm employment (the answer is no, I was there)? What information did they have at their fingertips that would prove so rapidly that someone denied adoption did not work for RWC? More importantly, why would Amber repeat such a wild story before she looked at these records that were so readily available? Most reasonable people, upon hearing this, would realize that the “guy in shorts” story is not plausible. I find it interesting that neither you, nor anyone else on the board questioned the sequence of events, nor asked for the data that was used to verify the accusation or its fabricated status.

To be 100% clear, the only thing that was looked up during the meeting was who adopted Nico, the dog that Amber falsely said was adopted by Jodie and Angela.

You state “Upon determining that this was a case of mistaken identity, both employees felt comfortable recommending that we pursue the vetting process with Real World Canine as a potential NHS partner.” Neither Amber nor Kaitlin stated they were comfortable recommending the pursuit of the vetting process.

As a matter of fact, my last words to Kaitlin and Amber were that if they failed Punchy, that will be enough to make me walk away from NHS and never come back. I told them we are supposed to be here for the dogs and clearly you are not, you are more interested in coming up with lame-assed hurdles such as the ones Amber has produced just now. Does that sound like something that would be said by someone that has just heard that NHS was going to move forward with an initiative to help Punchy?

Your third paragraph: “Amber exchanged e-mails with you on March 15 indicating that we would like to make another site visit and explained that we would have to create an SOP (standard operating procedure) and speak to upper management to determine if anything else was needed to move this forward. I believe that you responded on March 19 and I don’t believe that NHS has responded to that message. Unfortunately, staff has been shorthanded due to the season and an untimely death of a team member. In addition, the dog in question, Punchy, was adopted out on March 22, NHS does have a number of partners we are currently evaluating in addition to your business and the process does not always move quickly.”

You state “Amber exchanged e-mails with you on March 15 indicating that we would like to make another site visit and explained that we would have to create an SOP (standard operating

procedure) and speak to upper management to determine if anything else was needed to move this forward.”

I find it interesting that you seem to cherry pick one email sent from Amber, vs all the other emails that were exchanged. Following is a sequence of events and correspondence between RWC and NHS, for your information:

- 1- On February 24th, Kaitlin and I toured RWC. Kaitlin sent an email to Jodie, February 24th, including questions from Amber and David.
- 2- Jodie responded February 25th with very detailed answers – 20 hours and 41 minutes later.
- 3- Amber requested she and David be provided a site visit on March 15th- 18 days later.
- 4- On March 15th Jodie replied asking Amber to provide possible dates and times, and stated she (Jodie) would make it happen - 10 minutes after Amber’s email.
- 5- On March 16th I saw Jodie at RWC, while picking up Lumi. Jodie mentioned she had replied to Amber’s email and the ball was in her court.

On March 17th I approached Amber in her office (regarding Yoshi), and mentioned that Jodie had not yet heard back from her on times for her and David’s visit. Amber looked at her computer and responded that Jodie still had not replied to her email, sent March 15th. Amber acted a bit annoyed. I remember thinking Amber was being disparaging of Jodie for (supposedly) not responding in two days, yet Amber took 18 days to respond to Jodie.

On March 19th, I told Jodie that Amber is claiming that she did not receive her email. Jodie resent the email that same day, and requested that Amber confirm receipt.

I also find it interesting that in my recorded conversation with Greg, Greg made a disparaging comment about the owners of RWC because they were responding so quickly to NHS emails.

Greg “See, I feel bad because I feel like the folks at Real World Canine, who are probably great people, from what I can tell, they are great people maybe. **And please don’t tell them that I said this, because I’m not trying to defame them but maybe they’re a little pushy,** because I don’t think they understand what it takes for us to get programs together. I mean, I will tell you, just yesterday, we spent an hour on the phone with the pups program.” Time stamp: 1:22:01

I find it interesting that Greg takes issue with people who respond to email quickly, but has no issue with Amber taking 18 days to initiate contact for help with a dog in immediate need. Nor does he have an issue with Amber falsely asserting that she did not get a quick response from Jodie.

You state “ Unfortunately, staff has been shorthanded due to the season and an untimely death of a team member.”

What is the “season” you refer to as the reason you don’t believe NHS has gotten back to Jodie’s email of March 19th? I go in every single day, and from the 19th of March to present there has been no special season or event that would justify Amber’s inability to respond to email.

With regard to the “untimely death of a team member,” I had to read that a few times before I could muster a response. The person that you are referring to is Jay, and he does not deserve to be used as your excuse for Amber not doing her job, especially after his death. Just because Punchy was adopted on March 22nd does not release Amber from doing her job and following basic rules for social interaction and best business practices, such as responding to emails. Just

because Punchy was adopted that did not mean the offer was withdrawn by RWC to help other dogs. I would reiterate my previous question, was there ever really any intent on Amber's part to follow through so Punchy could get the help/enrichment from RWC? RWC offered to provide these services to him or any other dog. I believe the answer to that question is glaringly obvious. I truly believe that the ONLY reason and time everyone REALLY became engaged in building a partnership with RWC was AFTER, and BECAUSE of Jodie's letter to the board.

You state "NHS does have a number of partners we are currently evaluating in addition to your business."

If NHS has a number of partners, then why did Staci tell me (when we originally spoke about Punchy going to RWC) that in the past there had been partnerships but there were none at present?

You state "and the process does not always move quickly."

Interestingly enough, I was told by Staci and Kaitlin this was an easy thing to put in place. Kaitlin herself told me everyone who needed to say yes had said yes, she just wanted to see the facilities at RWC before sending Punchy up there for his evaluation on March 2nd.

Your fourth paragraph: "There was no defamation, slander or unethical behavior from our employees or any intent to harm you or your business. This was simply a business discussion in a private office between two employees and a volunteer. The mistaken identity was cleared in the moment and that was the end of the discussion."

Everything that I have previously identified in this email, shows that this statement is incorrect. The rationale that you use to justify this conclusion is erroneous. The lack of thought or questioning of the obvious gaps in your response undermine your credibility and the credibility of NHS.

This was not just a case of **mistaken identity that was cleared in the moment and that was the end of the discussion**. The facts that I present in this letter, along with the obvious gaps in logic, show that your response is not the truth. The truth is that Amber made the statements that she is accused of against RWC and the owners, and she attributed them to David. Period!!

I pose one more question to you. In my recorded conversation with Greg, he states that Amber came to him and offered to apologize. If she did nothing wrong, as you state, why did she offer to apologize? Are the points in your letter correct or has she done something wrong and needs to apologize to RWC? Both cannot be correct, and one must be false.

I would also like to make it clear that Amber's behavior during the meeting was in no way anomalous to the general behavior of personnel at NHS. Gossip, name calling, bullying, screaming, holding grudges, personal vendettas, are all commonplace at NHS, against people and dogs. A person on dog staff said, "You're going to die, you're going to die, you're going to die", to a dog that was on its way to be euthanized. People being told, "you can quietly resign or be terminated." Greg was hiding in his office listening to the Advisory Board's committee meeting, when he was supposed to be there to present. NHS suffers from a lack of ethical behavior across all levels of personnel. No one would be surprised to hear that Amber said untrue things about RWC and its owners, and David was the source of this information.

I stand by what I told Greg during our recorded meeting.

1. Amber stated very clearly: the owners have swastikas on the back of their vehicle, the owners tried to adopt a dog from NHS last summer and couldn't so they had someone else adopt it for them, and RWC doesn't treat the dogs well. I did not misunderstand or misinterpret what Amber said. Amber in no way indicated that she was investigating these as allegations. She stated them as facts, and even after I countered each point, she provided no indication that the matter was resolved (as you erroneously state in your letter). I left the meeting with an ultimatum that I was going to stop supporting NHS, which would not have been necessary if everything was resolved during the meeting (as you falsely state in your letter).
2. I am not beholden to NHS or Greg for a paycheck or evaluation. So, I have nothing to lose by telling the truth. I told Greg the truth during our recorded meeting, and he/you chose to ignore my account in your letter to Jodie.
3. I was not wrong to tell Jodie what Amber said about RWC. NHS personnel frequently do not behave in a manner that "business discussions in a private office" stays private, and what she and David said would have been spread by word of mouth throughout the organization and beyond. A favorite quote of mine: "A lie can get half way around the world before the truth can even get out of bed and get its boots on." – Admiral Chegwiggon – JAG. Had I not told Jodie, and had she not written the letter, who else would have heard those false accusations, which were not resolved during the meeting.
4. It is not my responsibility to assist NHS to "repair the relationship we had with RWC" as Greg requested in our recorded meeting. First of all, there was no relationship with RWC prior to this incident. Their offer to provide free services for dogs that might need extra help was brokered by me, and was RWC's first attempt to partner with NHS. Amber's unprofessional statements about them personally, and your false response to their letters have done irreparable damage to any relationship that could have been established.
5. I am a very good volunteer at NHS. Both Kaitlin and Staci have been heard to say: Cindy's all the dogs' favorite, even if she doesn't walk them, they know her and love her. I am VERY good with the dogs, especially the challenging ones. I love them all, and they all know it. I realize that NHS management may decide to take punitive action against me for telling the truth, which contradicts the information in your letter. I would ask that you consider the fact that I am going to take a lie detector test to verify what I have said in this letter. I am 100% certain that it will validate what I have said in this letter. Please ask yourself, is NHS an organization that will punish people for telling the truth? If so, then it doesn't deserve good people like myself. I will add that should NHS take retaliatory actions against people who tell the truth, I am certain that the public and donors will not react well.

Should you have any questions or need any clarifications please feel free to contact me.

Cindy Hansen