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ELECTION COMMITTEE HEARING

In the Matter of:

**The 2024 Election of Officers
of SEIU Local 32BJ**

ELECTION COMMITTEE HEARING

DATE: Tuesday, September 24, 2024

TIME: 10:08 a.m.

BEFORE: Honorable Hearing Officer Jordan Weiss,
Chair of the Election Committee

LOCATION: 32BJ SEIU - Manhattan Office and Union
Headquarters
25 West 18th Street
New York, NY 10011

REPORTED BY: James Bekman

JOB NO.: 6889860

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A P P E A R A N C E S

ON BEHALF OF THE 2024 ELECTION OF OFFICERS OF SEIU
LOCAL 32BJ:

WALTER (TERRY) MEGINNISS, ESQUIRE
Gladstein Reif & Meginniss
39 Broadway, Suite 2430
New York, NY 10006
tmeginniss@grmny.com
(212) 228-7727

ON BEHALF OF SEIU LOCAL 32BJ:

KATCHEN A. LOCKE, ESQUIRE
SEIU Local 32BJ - General Counsel
25 West 18th Street
New York, NY 10011
klocke@seiu32bj.org
(212) 539-2941

ON BEHALF OF THE STAND TOGETHER SLATE:

ELIZABETH A. BAKER, ESQUIRE
SEIU Local 32BJ
25 West 18th Street
New York, NY 10011
ebaker@seiu32bj.org
(212) 388-2060

A P P E A R A N C E S (Cont'd)

ALSO PRESENT:

Lori Orme, Chief of Operations for SEIU Local
32BJ

Antonio Delgado, 2024 Election Committee Member

Esther Alamas, 2024 Election Committee Member
(by videoconference)

Ena Softley, 2024 Election Committee Member

Metztli Hamelius, Legal Assistant, SEIU Local
(Election Coordinator)

Lucille Ortega, Spanish Interpreter (by
videoconference)

Vilma Sanchez, SEIU Local 32BJ Members for Better
Union Slate

Alexandra Brion, SEIU Local 32BJ Members for
Better Union Slate

Carlos Guzman, SEIU Local 32BJ Members for Better
Union Slate

John Santos, SEIU Local 32BJ -
Secretary/Treasurer

Hiroyuki Kawahara, Assistant Vice President of
Elections American Arbitration Association (by
videoconference)

E X H I B I T S

NO.	DESCRIPTION	ID/EVD
Exhibit 1	Carlos Guzman Letter to Committee on Elections and Manny Pastreich Dated 9/20/24	10/
Exhibit 2	Carlos Guzman Letter to John Santos Dated 7/8/24	11/
Exhibit 3	Walter Meginniss Letter to Carlos Guzman Dated 7/9/24	11/
Exhibit 4	Carlos Guzman Letter to Manny Pastreich Dated 7/21/24	12/
Exhibit 5	Walter Meginniss Letter to Carlos Guzman and Carina Cruz Dated 7/23/24	12/
Exhibit 6	Carlos Guzman Letter to John Santos Dated 7/28/24	12/
Exhibit 7	Katchen Locke Letter to Carlos Guzman Dated 8/8/24	13/
Exhibit 8	E-mail Chain Re: September 20 Letter, Election Committee Hearing on 9/24/24	14/
Exhibit 9	AAA Department of Elections Certification of Results SEUI 32BJ Dated 9/20/24	14/

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E X H I B I T S (Cont'd)

NO.	DESCRIPTION	ID/EVD
Exhibit 10	Carlos Guzman Letter to John Santos Dated 7/18/24	16/
Exhibit 11	Blank Stand Together Petition	48/
Exhibit 12	Two Pages from 2023 LM-2 Filed on Behalf of 32BJ	60/
Exhibit 13	One Page from AAA Certification of Election in 2024 and One Page from AAA Certification of Election in 2021	103/

1 P R O C E E D I N G S

2 THE HEARING OFFICER: Good morning,
3 everyone. My name is Jordan Weiss. I am the Election
4 Committee Chair.

5 And do you need my spelling?

6 J-O-R-D-A-N, W-E-I-S-S last name.

7 And we are here for the hearing today.
8 And let me just introduce the other Committee members.

9 MR. DELGADO: Antonio Delgado.

10 MS. SOFTLEY: Ena Softley.

11 THE HEARING OFFICER: Anybody on Zoom
12 want to give their names?

13 MS. HAMELIUS: Ms. Esther Alamas is by
14 Zoom. She's on phone with the interpreter so she can
15 hear the hearing in Spanish.

16 MS. BRION: I'm sorry. We can't see
17 her --

18 THE HEARING OFFICER: They can't see
19 here. Yeah, they can't see her.

20 MS. HAMELIUS: Yeah. The individuals
21 on the call are the court reporter who's transcribing
22 the hearing and the interpreter. And then it looks
23 like a couple more lines just because that's a phone
24 that's on, and the interpreter has an extra phone.

25 MS. BRION: Thank you.

1 THE HEARING OFFICER: Okay.

2 So now I'd like to turn things over to
3 Terry Meginniss.

4 MR. MEGINNISS: I'm just going to
5 describe the hearing itself so people understand. I
6 know you've been through these before. It's very much
7 the same.

8 This is a fact-finding hearing by the
9 Election Committee. The Election Committee has
10 received a protest from Mr. Guzman about the conduct
11 of the election. The purpose of this is to give
12 information to the Committee. This is not Perry
13 Mason. This is not an adversarial hearing. People
14 will not be cross-examining each other. The questions
15 will come from the Committee. If at any time you
16 believe that a question should be asked by the
17 Committee to someone else, tell that to the Committee
18 and the Committee will decide whether to ask that
19 question. Very likely it will, but it's for the
20 Committee to decide what questions to be asked.

21 And I believe it would be very helpful
22 if everybody said their name before they start
23 speaking and then speak loudly and slowly and clearly
24 so that the court reporter, who is in a distant
25 location, can hear you and transcribe what you're

1 saying accurately. And now before we go further, it
2 might be useful just for those of you who are not
3 Committee members just to identify yourselves on the
4 record.

5 Why don't we start with you?

6 MS. BAKER: Sure.

7 Good morning. My name is Elizabeth
8 Baker, B-A-K-E-R. I'm here as a volunteer and
9 representative of the Stand Together slate.

10 MR. MEGINNISS: Okay.

11 MS. BRION: Good morning. My name is
12 Alexandra Brion, B-R-I-O-N. And I'm here voluntary to
13 support --

14 MR. MEGINNISS: The complaint that
15 Mr. Guzman filed?

16 MS. BRION: Yes.

17 MR. GUZMAN: My name's Carlos Guzman.
18 I come here for protest the election and to give you
19 some information why I'm protesting the election.

20 MR. MEGINNISS: Yes. Thank you.

21 MS. SANCHEZ: My name is Vilma Sanchez.

22 MR. MEGINNISS: I'm sorry?

23 MS. SANCHEZ: Vilma Sanchez.

24 MR. MEGINNISS: Okay.

25 Did you get that Mr. Court Reporter?

1 THE REPORTER: I could not hear at all
2 whoever just spoke last. My apologies.

3 MR. MEGINNISS: Your name is?

4 MS. SANCHEZ: Vilma Sanchez.

5 MR. MEGINNISS: Vilma Sanchez.

6 W-I-L-M-A [sic] Sanchez.

7 And you are here supporting Mr. Guzman
8 as well?

9 MS. SANCHEZ: Yes.

10 MR. MEGINNISS: Okay. Thank you.

11 THE HEARING OFFICER: And now I just
12 want to turn it over to Metztli, who's going to
13 discuss --

14 MR. MEGINNISS: Speak up, Jordan.

15 THE HEARING OFFICER: Sorry.

16 Now, I'd like to turn it over to
17 Metztli to discuss documents and extra stuff that is
18 related to this hearing.

19 MS. HAMELIUS: Okay.

20 My name is Metztli Hamelius and I'm the
21 Election Coordinator. I just -- we want to talk about
22 the -- the relevant protests for today's hearing,
23 starting with the September 20th protest filed by
24 Mr. Guzman.

25 MR. MEGINNISS: Let's mark that

1 Exhibit 1 and hand a copy to the other side.

2 (Exhibit 1 was marked for
3 identification.)

4 (Discussion held off the record.)

5 MR. MEGINNISS: And Mr. Court Reporter,
6 another person just entered the room. That's Katchen
7 Locke, L-O-C-K-E. She is the general counsel of the
8 Union and --

9 THE REPORTER: Can you please repeat?

10 MR. MEGINNISS: Katchen, K-A-T-C-H-E-N,
11 L-O-C-K-E. And if you don't mind, Mr. Guzman has
12 asked you to state your name so he is aware who you
13 are.

14 THE REPORTER: For me, the court
15 reporter?

16 MR. MEGINNISS: Yes.

17 THE REPORTER: My name is James Bekman.

18 MR. MEGINNISS: And Mr. Guzman, he's
19 associated with a court reporting company called
20 Veritext, V-E-R-I-T-E-X-T. James Bekman.

21 I'm sorry, Metzli.

22 MS. HAMELIUS: Oh. So starting with
23 the July 20th letter from Mr. Guzman protesting the
24 results of the election --

25 MR. MEGINNISS: September 20th?

1 MS. HAMELIUS: Yes, September 20th.

2 In addition to that, I'm going to go
3 ahead and go through the other relevant protests that
4 he references in his September 20th protest. So on
5 July 8, 2024, we have a protest sent from Mr. Guzman
6 to John Santos, our -- the secretary/treasurer of the
7 Union.

8 MR. MEGINNISS: Let's mark this
9 Exhibit 2.

10 (Exhibit 2 was marked for
11 identification.)

12 And give me a second.

13 MS. HAMELIUS: Following this document,
14 we have --

15 MR. MEGINNISS: Too fast for me.

16 MS. HAMELIUS: Sorry.

17 Following that document, we have the
18 July 9th response from the Election Committee.

19 MR. MEGINNISS: Let's mark this
20 Exhibit 3.

21 (Exhibit 3 was marked for
22 identification.)

23 And this is a letter to Mr. Guzman from
24 me.

25 UNIDENTIFIED SPEAKER: Mr. Meginniss,

1 this is Exhibit 3?

2 MR. MEGINNISS: Yes.

3 MS. HAMELIUS: Following Exhibit 3, we
4 have the July 21st letter from Carlos Guzman to Manny
5 Pastreich.

6 MR. MEGINNISS: Let's call that
7 Exhibit 4.

8 (Exhibit 4 was marked for
9 identification.)

10 MS. HAMELIUS: Following that, we have
11 the July 23rd response to Mr. Carlos Guzman on behalf
12 of the Election Committee from Attorney Meginniss.

13 MR. MEGINNISS: Let's call that
14 Exhibit 5.

15 (Exhibit 5 was marked for
16 identification.)

17 Okay.

18 MS. HAMELIUS: We have the July 28th
19 appeal letter from Carlos Guzman to
20 secretary/treasurer John Santos.

21 MR. MEGINNISS: Let's call that
22 Exhibit 6.

23 (Exhibit 6 was marked for
24 identification.)

25 Okay.

1 MS. HAMELIUS: Following that, we have
2 the August 8, 2024, letter to Mr. Guzman from Katchen
3 Locke regarding the E. Board's rejection of the
4 appeal.

5 MR. MEGINNISS: Let's call that
6 Exhibit 7.

7 (Exhibit 7 was marked for
8 identification.)

9 Okay.

10 MS. HAMELIUS: And then we have the --
11 in response to that September 20 letter marked as
12 Exhibit 1, we have our correspondence with Mr. Guzman
13 informing him of the date and time for this hearing.

14 MR. MEGINNISS: Call that Exhibit 8.
15 Is that where we're at?

16 THE REPORTER: Counsel, are we marking
17 another exhibit?

18 MR. MEGINNISS: I'm sorry?

19 THE REPORTER: Are we marking another
20 exhibit, Counsel?

21 MR. MEGINNISS: I believe this one that
22 I'm handing out is Exhibit 8.

23 THE REPORTER: Yes. Thank you,
24 Counsel.

25 //

1 (Exhibit 8 was marked for
2 identification.)

3 MR. MEGINNISS: Thank you.

4 MS. HAMELIUS: Further relevant
5 documentation is the AAA's final certification of
6 results.

7 MR. MEGINNISS: Let's mark that
8 Exhibit 9.

9 (Exhibit 9 was marked for
10 identification.)

11 MS. HAMELIUS: Exhibit 9, September 20,
12 2024.

13 MR. MEGINNISS: Okay.

14 As Mr. Guzman received Exhibit 1, he
15 notified me --

16 Oh, was there one more? Okay.

17 He notified me that he thought that
18 Exhibit 1 was not complete.

19 And Mr. Guzman, could you explain?

20 MR. GUZMAN: Exhibit 1, three -- three
21 documents. That's what I want to point out.

22 MR. MEGINNISS: Can you show us those
23 three documents because I'm not sure we have the other
24 two. Those are included in Exhibit 1.

25 MR. GUZMAN: Yes --

1 MR. MEGINNISS: So it's three -- in
2 other words, Exhibit 1 is complete but it's comprised
3 of three separate documents: A letter and two pages
4 that are attached to it which are separate documents?

5 MR. GUZMAN: Yes.

6 MR. MEGINNISS: Okay. But it's a
7 complete set?

8 MR. GUZMAN: Yes.

9 MR. MEGINNISS: Okay. All right.
10 Thank you.

11 MR. GUZMAN: Another point.

12 MR. MEGINNISS: Yes?

13 MR. GUZMAN: It's missing one letter
14 from me to the -- to the secretary of the Union on
15 July 18th.

16 MR. MEGINNISS: Okay.

17 Do we have that?

18 Could we mark that? Do you mind if we
19 copy that and mark that and put that into the record?
20 Because I don't know that we have that July 18th.
21 July 18th; right?

22 MR. GUZMAN: Yes.

23 MR. MEGINNISS: I believe you.

24 Do we have that, Leslie? July 28th.

25 MR. GUZMAN: Eighteenth.

1 MR. MEGINNISS: No, I understand.

2 Well, let's do this. Mr. Guzman, can we just make
3 copies of that now and we'll distribute it?

4 MR. GUZMAN: Wait. I looking for it.

5 MR. MEGINNISS: Oh, okay.

6 MS. HAMELIUS: If you send it, I'll run
7 and get it.

8 MR. MEGINNISS: Okay. We'll just break
9 for one minute while we get that copied and then we'll
10 come back, mark that, and that'll be called the
11 background documents.

12 So we're just going to break for a
13 minute, Mr. Court Reporter.

14 THE REPORTER: Thank you.

15 (Off the record.)

16 MR. MEGINNISS: Okay. Let's mark this
17 July 18 letter from Mr. Guzman to --

18 Is that to Mr. Santos?

19 MR. GUZMAN: Yes.

20 MR. MEGINNISS: To John Santos, let's
21 mark that Exhibit 10.

22 (Exhibit 10 was marked for
23 identification.)

24 (Discussion held off the record.)

25 MR. MEGINNISS: Okay. These are all

1 the documents that the Election Committee believes
2 bear on your charge -- on your protest.

3 MR. GUZMAN: Okay.

4 MR. MEGINNISS: In your September 20th
5 protest, you listed some things and then you said you
6 incorporate by reference all the previous charges. So
7 the purpose of this is to let you know this is what we
8 understand to be the scope of what you are complaining
9 about today.

10 MR. GUZMAN: Yes.

11 MR. MEGINNISS: If there is more than
12 this, it -- we need you to say it and tell us what it
13 is. But there's a lot here, and I'm not suggesting
14 there has to be more, but if you have more we need to
15 know what it is.

16 MS. HAMELIUS: I also did want to just
17 clarify the other individual on the call. Her name is
18 Lucille Ortega and she's the interpreter.

19 MR. MEGINNISS: Say that louder so the
20 court reporter can hear. Lucille?

21 MS. HAMELIUS: Lucille Ortega and she's
22 the interpreter for today for Ms. Esther Alamas.

23 MR. GUZMAN: There is another letter
24 that she sent an e-mail to the president, but we don't
25 have that in physical.

1 MR. MEGINNISS: Okay

2 MS. BRION: I have it here.

3 MR. MEGINNISS: Does it raise a
4 different issue?

5 MR. GUZMAN: It's the same issue
6 regarding the election, yes.

7 MR. MEGINNISS: I would like to -- yes.
8 To the extent that it raises an issue, the Election
9 Committee wants to know all the issues.

10 (Discussion held off the record.)

11 MR. MEGINNISS: Okay. I want to read
12 this into the record --

13 MS. BRION: I want to make sure --

14 MR. MEGINNISS: Okay. But don't go
15 away. I want you to listen to this also while I'm
16 reading it.

17 This is an e-mail from Alexandra Brion.
18 You already have that --

19 THE REPORTER: Counsel, if you could
20 speak closer to the microphone. For some reason that
21 corner is a little muffled. I'm sorry.

22 MR. MEGINNISS: This is an e-mail from
23 Alexandra Brion to Manny Pastreich dated Monday,
24 September 16, 2024, at 7:41 p.m. "Hello brother
25 Manny. Some of my coworkers at 66 Hudson Yard haven't

1 received their voting envelopes. It's important to
2 address this issue promptly and fast. The place where
3 the envelopes are sent requires Union approval to
4 resend them and they need to be sent by FedEx. They
5 should be able to investigate why the envelopes
6 haven't been delivered and ensure that everyone
7 entitled to vote received their ballot. This wore --
8 this wore" -- W-O-R-E, I think you mean were, W-E-R-E.
9 "These were people that have signed my petition. I'm
10 concerned that Rogelio Walker's" -- Rogelio is
11 R-O-G-E-L-I-O -- "recent move from my building might
12 have affected the voting process or created a conflict
13 of interest. I request a review to ensure that the
14 voting process remains fair and unbiased. Also, I
15 keep" --

16 MS. BRION: I added to the letter but
17 to the voting --

18 MR. MEGINNISS: So that's the gist
19 of -- what I've read is all that needs to be read
20 also?

21 MS. BRION: Yes.

22 MR. MEGINNISS: Fair and unbiased.
23 That's it. Okay.

24 MS. BRION: Okay.

25 MR. MEGINNISS: I understand. No

1 problem. All right. And that is an e-mail that I
2 understand you sent to Mr. Pastreich at 7:42 p.m. on
3 September 16th.

4 MS. BRION: Okay.

5 MR. MEGINNISS: Okay. All right.

6 Thank you.

7 All right. Just so you know,
8 Mr. Guzman, from all of these I'm going to summarize
9 as best I can what I believe are the issues that
10 you've raised. I'm not intending to characterize
11 them. I'm just telling you what the Election
12 Committee perceives them to be after some discussions
13 internally.

14 First, that members of Stand Together
15 slate, some of whom were business agents, some of whom
16 were shop stewards or other staff members of the
17 Union, interfered with the efforts of your slate to
18 get signatures on their petitions, and in at least one
19 instance removed petitions that were for your slate
20 from a building without authorization. That's one
21 kettle of charge that I understand.

22 Second, that the number of ballots
23 mailed out by the AAA -- there's a record of them
24 having mailed out 186,056 -- exceeded by a large
25 number the number of members reported by the Union on

1 the 2023 LM-2 that they filed with the Department of
2 Labor.

3 LM-2 is capital L, capital M, dash 2.

4 Third, that the Stand Together
5 petitions were -- did not match what the Constitution
6 required in that they included information that wasn't
7 required by the Constitution and that they named
8 offices that people were nominated for that didn't
9 correspond to the way those were described in the
10 Constitution.

11 Fifth, that there were several
12 candidates who were found ineligible in the
13 eligibility decision by the Election Committee in July
14 who, in your judgment, should not have been found
15 ineligible.

16 Six, that there were candidates who
17 were held to be not in good standing or there were
18 members who were deemed not valid signers because of a
19 failure to pay dues. And your allegation is that this
20 was the responsibility of the Union to be enforcing
21 contract clauses that would've required them to pay
22 dues so that invalidations would be inappropriate.

23 And lastly --

24 MR. GUZMAN: Excuse me. I believe I
25 said the -- the secretary/treasurer is the obligation

1 to collect that, the Union dues.

2 MR. MEGINNISS: Okay. And I don't mean
3 to -- okay. So right, your point is it was the
4 secretary/treasurer's obligation to collect the dues.
5 Yes.

6 And lastly, that the Union is so large
7 geographically and so large in terms of the number of
8 members in the Union that the 30-day period to collect
9 signatures is too short under the law.

10 That's what we have. That's what we
11 understand to be the body of the claims that you're
12 making.

13 MR. GUZMAN: Yes.

14 MR. MEGINNISS: We -- I -- today there
15 are several areas that the Union wants to -- that the
16 Election Committee has questions about. Some of the
17 questions are for you, some of the questions are for
18 the Union. And so at a certain point in time we'll be
19 calling in from the Union the person who was
20 responsible for sending the list to the AAA and filing
21 LM-2 to ask questions of them.

22 But first we have questions for you.
23 The most important question we have for you has to do
24 with the interference with the signing of the
25 petitions, and this is referred to in your letter of

1 July 18. And your letter of July 18 includes specific
2 incidents and I wanted to ask you about those
3 incidents; is that okay?

4 MR. GUZMAN: Yeah.

5 MR. MEGINNISS: You with me so far?

6 MR. GUZMAN: Yes.

7 MR. MEGINNISS: All right. It starts
8 on page 2 of the -- I'm sorry, let me back up. There
9 is one more issue that you have raised in this July --
10 and honestly, this has come to our attention today.
11 You raised the issue that checks were paid to shop
12 stewards and they were given the list of buildings to
13 collect signatures from and to intimidate, harass, and
14 obstruct members in signing your petitions sometime in
15 May. That's an eighth area.

16 Let me talk about -- let me ask you
17 questions first about the instances in which you
18 contend there was harassment or intimidation. The
19 first one that I see is "Our sister at 57th Street and
20 11th Avenue was intimidated by the shop steward who
21 took possession of her petition." We need to know the
22 name of the sister and the name of the shop steward
23 and the date that this occurred. Do you know that?

24 MR. GUZMAN: I don't know the name of
25 the -- of the member. I remember calling the vice

1 president Manny -- not Manny, Dennis. Dennis just --
2 I spoke to him. I complained to him regarding the
3 issue -- to us, took it from this member and the
4 petition, or they ask her that they had to -- she had
5 to bring it back -- signed by all the members from
6 that building. She had to bring it back on Monday.
7 And she brought the petition and give it to -- to the
8 shop steward, I believe, or to the foreman.

9 And then I called Dennis and I
10 explained to him what's happen in that building and
11 he -- I told him that it have to -- shop steward or
12 the -- or the foreman to give back the petition to
13 this lady because he did nothing wrong. And same time
14 to explain her that what she's doing is allowed by the
15 law, that she had not to be afraid that the company or
16 the Union going to go up against her. So I told
17 Dennis to tell the shop steward or to tell the foreman
18 to give back the -- the petition. And -- and he --
19 she got the petition back.

20 MR. MEGINNISS: So the member got the
21 petition back?

22 MR. GUZMAN: Yes. But at the same
23 time, the member suffered some trauma because of the
24 way they -- they acting against her.

25 MR. MEGINNISS: I see.

1 MR. GUZMAN: You know -- her right
2 to -- to participate in a -- in a Union election.

3 MR. MEGINNISS: Okay.

4 MR. GUZMAN: That was something that
5 I've been complaining by the -- by the members, the
6 way they're acting against her.

7 MR. MEGINNISS: Okay. And --

8 MR. GUZMAN: -- afraid she going to
9 lose her -- something like that.

10 MR. MEGINNISS: The petition that she
11 got back, was that one that you ended up filing in
12 support of your campaign?

13 MR. GUZMAN: Yes. Yes.

14 MR. MEGINNISS: Okay.

15 I'd like to go to the next one. "At
16 2 5th Avenue, another shop steward obstructed the
17 collection of signatures." When did -- go ahead.

18 MR. GUZMAN: That was information
19 received from -- from Jarvis McCarthy.

20 MR. MEGINNISS: From Jarvis McCarthy?

21 MR. GUZMAN: He's the one who --

22 MR. MEGINNISS: Was he the one who was
23 trying to get the signatures at 2 5th Avenue?

24 MR. GUZMAN: Yes. Yes.

25 MR. MEGINNISS: And he told you that

1 this occurred?

2 MR. GUZMAN: Yes. Yes. Yes.

3 MR. MEGINNISS: Did he tell you whether
4 he got the signatures?

5 MR. GUZMAN: No. He didn't got it.

6 MR. MEGINNISS: He didn't. Why not?

7 MR. GUZMAN: Because the shop steward
8 was telling everybody not to sign the -- our petition.

9 MR. MEGINNISS: So the shop steward was
10 telling people not to sign?

11 MR. GUZMAN: Yes.

12 MR. MEGINNISS: And as a result of the
13 shop steward telling them that, they didn't sign?

14 MR. GUZMAN: Yes. Yes.

15 MR. MEGINNISS: Okay. And do you
16 know -- I know you don't, but do you have a date when
17 that occurred?

18 MR. GUZMAN: No. It have to be in
19 the -- in the period, you know.

20 MR. MEGINNISS: Yeah. Is Mr. McCarthy
21 coming today?

22 MR. GUZMAN: No. No. Not --

23 MR. MEGINNISS: Okay.

24 "At 200 East 66th Street, a shop
25 steward removed signed petitions." Do you know what

1 happened there?

2 MR. GUZMAN: The same thing, another
3 member told me.

4 MR. MEGINNISS: Who was that?

5 MR. GUZMAN: Joel Alexander.

6 MR. MEGINNISS: Joel Alexander?

7 MR. GUZMAN: Yes.

8 MR. MEGINNISS: Okay. And what did he
9 tell you?

10 MR. GUZMAN: The -- that the -- a
11 member of the Union told him that he got, like, a
12 three pages filled out with the signature from members
13 and he left the petition in the drawer on the day that
14 he was taking the day off. And the following day when
15 he came back, all the petition disappear and he
16 believed that somebody from -- from the shop steward
17 or the Union, somebody took it. Yes.

18 MR. MEGINNISS: Okay. So it says that
19 it was a shop steward, but what I'm hearing you say is
20 he doesn't know who took them?

21 MR. GUZMAN: Yeah. Well, he -- he say
22 in the drawer where he put it, it's -- it's available
23 for the shop steward to get into the drawer and -- and
24 get it. But he doesn't know sure it was the shop
25 steward or was the -- somebody else.

1 MR. MEGINNISS: And did he ever recover
2 those petitions?

3 MR. GUZMAN: No. No.

4 MR. MEGINNISS: Okay. Okay.

5 "At 303" -- just -- you're not bringing
6 Mr. Alexander here today, I assume?

7 MR. GUZMAN: No. He's on vacation.

8 MR. MEGINNISS: Okay.

9 "303 East 60th Street, shop steward
10 removed signed petitions." Who was that and how did
11 you come to get that information?

12 MR. GUZMAN: Same -- I -- I believe was
13 same, Joel Alexander, that he was -- the area.

14 MR. MEGINNISS: And it was a similar
15 instance, where he left the petitions?

16 MR. GUZMAN: Yes.

17 MR. MEGINNISS: And when he came back,
18 they weren't there?

19 MR. GUZMAN: Yes. Yes.

20 MR. MEGINNISS: And if I'm -- is it --
21 I don't mean to put words in your mouth, I'm just
22 trying -- but he doesn't know who took them?

23 MR. GUZMAN: No. No.

24 MR. MEGINNISS: Okay.

25 MR. GUZMAN: Because he left the

1 petition in the building with somebody and people
2 trust the other coworkers but somebody -- disappear.

3 MR. MEGINNISS: Yeah. I understand.

4 "LeFrak City building, our signed
5 petitions removed." What do you know about that?

6 MR. GUZMAN: Same thing. People would
7 help me to collect signatures. They claiming they
8 have the petition the same way, they -- they leave the
9 petition in some drawer around their building and --
10 and somebody took it.

11 MR. MEGINNISS: I understand. This
12 wasn't Mr. Alexander though?

13 MR. GUZMAN: No. No. It just the
14 same -- no. No.

15 MR. MEGINNISS: And who is the person;
16 do you know?

17 MR. GUZMAN: No. I -- I don't remember
18 his name right now.

19 MR. MEGINNISS: 225 Liberty, this was
20 one where you're saying that someone obstructed your
21 getting the petition signed, a business agent. So is
22 this one you already know the name of the person who
23 obstructed?

24 MR. GUZMAN: No. I don't remember the
25 name, but it was a shop steward -- they covered the

1 area of that building. They was telling the shop
2 steward -- or members of Union not to collect
3 signature in the building, he had to go outside the
4 building to collect.

5 (Discussion held off the record.)

6 MR. MEGINNISS: So just to understand
7 what you're saying, one of your supporters tried to
8 get into the building to collect signatures?

9 MR. GUZMAN: No. He work in that
10 building.

11 MR. MEGINNISS: Oh, he works in the
12 building?

13 MR. GUZMAN: Yes.

14 MR. MEGINNISS: Okay. And he was told
15 by the shop steward --

16 MR. GUZMAN: No. By the delegate and
17 the shop steward. The elect delegate.

18 MR. MEGINNISS: So an elected official?

19 MR. GUZMAN: The delegate. I don't
20 know if elected official.

21 MR. MEGINNISS: Okay. A building
22 delegate.

23 MS. HAMELIUS: Is it a rep?

24 MR. GUZMAN: So we call delegate. We
25 want to call the business agent? Okay. That's --

1 MR. MEGINNISS: No. No, I'm not
2 calling him anything. Is this a paid employee of the
3 Union?

4 MR. GUZMAN: Yes. It's -- no, an
5 elected officer --

6 MR. MEGINNISS: But it's a paid
7 employee?

8 MR. GUZMAN: Yes. It's business agent.

9 MR. MEGINNISS: Okay.

10 MR. GUZMAN: Or the delegate. We call
11 it delegate.

12 MR. MEGINNISS: I understand. And
13 what --

14 MR. GUZMAN: We call it delegate.

15 MR. MEGINNISS: Understood.

16 MR. GUZMAN: Business agent.

17 MR. MEGINNISS: What's the person's
18 name?

19 MR. GUZMAN: I don't know.

20 MR. MEGINNISS: What is the name of the
21 person who told you about this?

22 THE REPORTER: While we're looking for
23 the name, is there any way if we can instruct
24 Mr. Guzman to speak loud or maybe move the microphone
25 a little bit closer to him? I could hear Counsel

1 fine. I'm having a little trouble when the papers are
2 rustling with Mr. Guzman.

3 Yeah. Okay. That explains it. I was
4 hearing all your papers rustling.

5 If we could actually move it even
6 closer to him in the center. Thank you so much.

7 MR. GUZMAN: Giovanni Collado.

8 MR. MEGINNISS: Giovanni?

9 MR. GUZMAN: Collado.

10 MR. MEGINNISS: How do we spell that?

11 MR. GUZMAN: C-O-L-L-A-D-O.

12 MR. MEGINNISS: C-O-L-L-A-D-O?

13 MR. GUZMAN: Yes.

14 MR. MEGINNISS: Collado. And he was a
15 person who told you that he was told that he could
16 only collect signatures outside the building?

17 MR. GUZMAN: Yes.

18 MR. MEGINNISS: And do you know whether
19 that was a rule that applied to everybody?

20 MR. GUZMAN: No.

21 MR. MEGINNISS: Don't know?

22 MR. GUZMAN: No. No. But I think he
23 just complained the way they -- they act against him.
24 The other person was able to collect it inside.
25 That's what --

1 MR. MEGINNISS: Who was the other
2 person?

3 MR. GUZMAN: The other person who --
4 who was the delegate who was collecting signature in
5 there --

6 MS. BRION: The Union.

7 MR. MEGINNISS: How do you know that?

8 MR. GUZMAN: He told me that they --

9 MR. MEGINNISS: So he told you that
10 the --

11 MR. GUZMAN: Yeah. Yeah.

12 MR. MEGINNISS: Somebody else was --

13 MR. GUZMAN: Yeah. But --

14 MR. MEGINNISS: -- inside and he had to
15 collect outside?

16 MR. GUZMAN: Yes. Only him cannot --
17 cannot do it that way.

18 MR. MEGINNISS: Yeah. And did he
19 collect outside?

20 MR. GUZMAN: I believed he collect
21 signature, yes.

22 MR. MEGINNISS: Okay. So -- okay. And
23 the signatures that he collected were from people in
24 that building?

25 MR. GUZMAN: Yes.

1 MR. MEGINNISS: And did they form a
2 part of the petitions that you ended up filing?

3 MR. GUZMAN: Yes.

4 MR. MEGINNISS: Okay. And then "At
5 World Trade Center, a business agent obstructed
6 collection from the members." Who was that and --

7 MR. GUZMAN: I believed the same
8 business agent that I think is -- it's 225, next to
9 the World Trade Center.

10 MR. MEGINNISS: And was this someone
11 who also told you -- was it Mr. Alexander who told you
12 this?

13 MR. GUZMAN: No, no, no, no.

14 MR. MEGINNISS: Someone else told you?

15 MR. GUZMAN: Somebody else. Somebody
16 else who work in the World Trade Center.

17 MR. MEGINNISS: And who said that?

18 MR. GUZMAN: I don't have his name.

19 MR. MEGINNISS: And the name of the
20 business agent who --

21 MR. GUZMAN: I don't know. I don't --

22 MR. MEGINNISS: Sorry. I'm continuing.

23 "On Queens, a vice president obstructed collecting
24 signatures." Who was that?

25 MR. GUZMAN: They just told me was the

1 vice president because this person know him because
2 they work in the area and they told him that they are
3 not to start helping me collecting signatures.

4 MR. MEGINNISS: But they didn't tell
5 you the name?

6 MR. GUZMAN: No, no, no.

7 MR. MEGINNISS: And again, who told you
8 this?

9 MR. GUZMAN: Let me see. Maybe Frank
10 Brisso [sic].

11 MR. MEGINNISS: All right. Fran [sic]?

12 MR. GUZMAN: Brisso [sic], B-R-I-S-S-O.

13 MR. MEGINNISS: B-R-I-S-S-O.

14 B-R-I-S-S-O. It might have been Fran Brisso [sic] who
15 told you this?

16 MR. GUZMAN: Yes.

17 MR. MEGINNISS: But she didn't tell you
18 the name of the vice president?

19 MR. GUZMAN: No.

20 MR. MEGINNISS: Okay. And she didn't
21 say where except that it was from Flushing to --

22 MR. GUZMAN: Let me correct. I think
23 it -- it Frank Risso. Risso.

24 MR. MEGINNISS: R-I --

25 MR. GUZMAN: S-S-O.

1 MR. MEGINNISS: S-S-O? Fran or Frank?

2 MR. GUZMAN: Frank.

3 MR. MEGINNISS: Frank Risso?

4 MR. GUZMAN: Yes.

5 MR. MEGINNISS: Okay. And do you --
6 did they tell you -- I know they said that it was
7 obstruction, but they didn't tell you what the nature
8 of the obstruction was?

9 MR. GUZMAN: Look like -- what they
10 told me is, like, they -- they know the area and they
11 know the buildings around the area where they work and
12 they weren't able to collect lot of signature around
13 the area where they work from Flushing to -- to -- I
14 think to Woodside.

15 MR. MEGINNISS: Yeah.

16 MR. GUZMAN: They know a lot of
17 business. I -- I think they used to be shop steward
18 also.

19 MR. MEGINNISS: And what I'm trying to
20 get at, Mr. Guzman, is the obstruction that they
21 perceived, is it because members just said, "No, no,
22 no, I don't want to sign"? Or is it because someone
23 was there saying, "You can't come in and get
24 signatures"?

25 MR. GUZMAN: The vice president was

1 putting pressure to -- to those -- to this person not
2 to get involved.

3 MR. MEGINNISS: Not to get involved?

4 MR. GUZMAN: Yes. So they were an
5 obstruction of the --

6 MR. MEGINNISS: Okay. And the nature
7 of that pressure was just don't get -- saying, "Don't
8 get involved"?

9 MR. GUZMAN: Yeah. Yeah. Yes, yes.

10 MR. MEGINNISS: I got it. Okay.

11 MR. GUZMAN: Because they promise,
12 like, that they would able to collect signatures
13 from -- from Flushing to Woodside. That's a lot of
14 buildings in there. And they weren't able to collect
15 the -- because they were putting pressure on them.

16 MR. MEGINNISS: I got you. And then
17 the Grace Building on West 42nd Street. Any more
18 details about this? "A business agent obstructed the
19 collection of signatures"?

20 MR. GUZMAN: Yeah, similar. You know,
21 they're --

22 MS. BRION: Is that the Port Authority?

23 MR. GUZMAN: No.

24 MS. BRION: Remember the Port
25 Authority, too, that was collecting signatures?

1 MR. GUZMAN: Yeah. No, not that one.
2 We -- no, it's only what is in here.

3 MS. BRION: Oh, okay.

4 MR. MEGINNISS: And the name of the
5 business agent, again, do you know?

6 MR. GUZMAN: No. No.

7 MR. MEGINNISS: Okay. And the --
8 someone in the Grace Building told you this?

9 MR. GUZMAN: Yes, yes.

10 MR. MEGINNISS: Or someone trying to
11 get into the Grace Building told --

12 MR. GUZMAN: No, they working in the
13 building.

14 MR. MEGINNISS: Who is the person?

15 MR. GUZMAN: I don't know the names.
16 They were new members, they want to try to help us.

17 MR. MEGINNISS: And then "500 Fifth
18 Avenue, a female person were telling" -- I'm sorry.
19 "The business agent and a female person were telling
20 members that they only have to sign the petition of
21 Stand Together." Who reported this to you; do you
22 know?

23 MR. GUZMAN: I think one of the -- the
24 workers in the building told me those things.

25 MR. MEGINNISS: Do you know the name?

1 MR. GUZMAN: No.

2 MR. MEGINNISS: Okay. And the business
3 agent, do you know that name?

4 MR. GUZMAN: No. No.

5 MR. MEGINNISS: And again, the female
6 person, do you know?

7 MR. GUZMAN: No.

8 MR. MEGINNISS: And aside from telling
9 people that they didn't have to sign your petitions
10 and they told them not to sign the petitions, did they
11 do anything else to prevent them from signing?

12 MR. GUZMAN: No.

13 MR. MEGINNISS: But they did say that
14 you were a thief?

15 MR. GUZMAN: Yes. Yes.

16 MR. MEGINNISS: Okay. Okay. I think I
17 understand the list and I understand what you know and
18 I understand what you don't know. I have one question
19 for you. You called Mr. Johnson on one occasion. Did
20 you ever call him again to complain about any of this?

21 MR. GUZMAN: I don't think -- no, I
22 don't think so because this was a -- no, I call -- I
23 think I call him regarding some other -- other issue
24 in other building, but he told me that was an
25 apartment building, he had no -- no control over that

1 section.

2 MR. MEGINNISS: Did you call anyone
3 else about --

4 MR. GUZMAN: No. No. So I explain to
5 him that this happen.

6 MR. MEGINNISS: Okay.

7 MR. GUZMAN: He told me that he just
8 work in commercial building, somebody else working.

9 (Discussion held off the record.)

10 Okay. She want to add another issue
11 there.

12 MR. MEGINNISS: Okay.

13 Let me finish with Mr. Guzman one
14 second then I'll come back to you, Ms. Brion; okay? I
15 promise you'll get a chance to speak. I promise.

16 I understand that you're saying that
17 you were -- these efforts were to prevent you from
18 getting signatures on your petition; correct?

19 MR. GUZMAN: Yes.

20 MR. MEGINNISS: But you got enough
21 signatures on your petitions to be nominated?

22 MR. GUZMAN: Yes. But that's not the
23 point. The point is democracy. That's what I told
24 Mr. Vice President Dennis. The important is
25 democracy, you know? The -- the important is that the

1 member are free to do whatever they wanted, vote for
2 whoever they wanted. That's what the most important.

3 MR. MEGINNISS: Understood. Speak up,
4 please.

5 MR. GUZMAN: Okay. I don't know if
6 they can hear me, but he's not complaining.

7 MR. MEGINNISS: Sorry?

8 MR. GUZMAN: He's not complaining.

9 MR. MEGINNISS: Not yet.

10 MR. GUZMAN: Well, that's most
11 important to me is democracy because I've been
12 fighting for many years to make this Union a
13 democratic Union. And in order to have a democratic
14 Union is that the member are free to do whatever they
15 want to and that is allowed by the law of the -- of
16 the United States.

17 MR. MEGINNISS: What would you ask the
18 Election Committee to do?

19 MR. GUZMAN: Well, I think that we are
20 missing the other point they are putting in this
21 letter.

22 MR. MEGINNISS: Go ahead. What is the
23 other point?

24 MR. GUZMAN: That the -- the
25 petition -- the member stand together provided to --

1 to collect signatures, I think is not according to the
2 Constitution.

3 MR. MEGINNISS: Let's go to that issue.
4 Before we do though, Ms. Brion, you
5 wanted to say something so I wanted to give --

6 MS. BRION: Yeah. I -- I wanted to add
7 to the list of incidents. I was at the Port
8 Authority, 42nd and 8th Avenue, collecting signature,
9 which I didn't know Port Authority people, the
10 cleaners, are 32BJ. I asked, "Are you 32BJ?" They
11 say, "Yeah." I hand the petitions and one of the
12 person that works there says, "Oh, we have a
13 delegate."

14 MR. GUZMAN: Shop steward. Shop
15 steward.

16 MS. BRION: A shop steward. So he call
17 right there in front of me the delegate in the speaker
18 to let him know -- her, the delegate from the Union,
19 which it was a female -- I forgot the name he told
20 me -- that I was there with the petition for Members
21 for Better Union. And she was telling them, "Don't
22 sign, don't sign." He came -- and I didn't want to
23 talk to the delegate, I pass the phone to him, so for
24 him to let her know that we have the right to sign;
25 so --

1 MR. MEGINNISS: And then what happened?

2 MS. BRION: I continue collecting
3 signature. Whatever she say for me I found
4 inappropriate to tell the -- the cleaners in the Port
5 Authority not to sign. And this is a female delegate,
6 whoever's in charge of the Port Authority --

7 MR. GUZMAN: No, shop steward.

8 MS. BRION: Shop steward and -- and
9 Port Authority. Yeah, I don't know her name.

10 MR. MEGINNISS: And so if I'm
11 understanding what you're saying, Ms. Brion, she was
12 telling people not to sign?

13 MS. BRION: Correct. He had her in a
14 speaker --

15 MR. MEGINNISS: And Mr. Guzman got on
16 the phone --

17 MS. BRION: He happened --

18 MR. MEGINNISS: -- and said, "They have
19 a" -- or you were there, "They have a right to sign,"
20 and you were able to continue collecting signatures
21 after that?

22 MS. BRION: Yeah.

23 MR. MEGINNISS: Okay. Okay.

24 MR. GUZMAN: The point is --

25 MR. MEGINNISS: I understand.

1 MR. GUZMAN: Why the -- the leaders for
2 the Union tell the delegate -- I'm mean the shop
3 steward, "We are given this money, go collect the
4 signature and stop the member to sign the petition for
5 somebody else." And that's just not --

6 MR. MEGINNISS: My purpose is not to
7 explain why. I will tell you that every member has
8 the right to say to another member, "Don't support
9 that person." That is a democratic right also. But
10 that's not the point.

11 MR. GUZMAN: But the shop steward, no.

12 MR. MEGINNISS: I hear your point.

13 MR. GUZMAN: The shop steward, no.

14 MR. MEGINNISS: Even the shop steward
15 has that right. But let's move on because --

16 MR. GUZMAN: Okay.

17 MR. MEGINNISS: Let's talk about the
18 Stand Together petitions.

19 MR. GUZMAN: Yes.

20 MR. MEGINNISS: Your point there is --
21 what you're asking for there, I believe, is that the
22 Stand Together petitions should all be invalidated?

23 MR. GUZMAN: Right.

24 MR. MEGINNISS: And therefore there
25 shouldn't have been an election?

1 MR. GUZMAN: Yes.

2 MR. MEGINNISS: And the Members for a
3 Better Union should have won?

4 MR. GUZMAN: Yes.

5 MR. MEGINNISS: Okay. And the reason
6 that you asked for that is in the name of democracy?

7 MR. GUZMAN: Yes. Because --

8 MR. MEGINNISS: So --

9 MR. GUZMAN: Okay.

10 MR. MEGINNISS: Go ahead. Tell me
11 what's wrong with --

12 MR. GUZMAN: Okay. We, the Union, we
13 have to follow the Constitution to do an election and
14 any business between the members and the leaders. At
15 the same time we had to follow in the election the
16 notice of the election, the nomination, and we had to
17 follow the labor law. In order to follow all those
18 things, we had to follow the -- the Constitution. The
19 Constitution say in some article this is -- are the --
20 the officers of the Union.

21 MR. MEGINNISS: Offices?

22 MR. GUZMAN: Of the Union. At the same
23 time in the same -- say that the petition had to be in
24 this way. You have to put the name and the officer
25 they are running and that's it. They don't say -- ask

1 you for a phone or any other thing. So to me
2 they, the officer or the -- or the candidate from
3 Stand Together, do not respect the Constitution. And
4 because don't follow the Constitution, it's against
5 the -- the Constitution and don't follow the rules of
6 the Constitution and -- and those petition are to be
7 invalid because they are not according to the
8 Constitution.

9 MR. MEGINNISS: Just so I understand,
10 what I'm hearing you say is -- I think we got this the
11 first time when we dealt with this issue. You're
12 saying that the way they list the offices that people
13 are running for is different from the way the
14 offices -- Constitution?

15 MR. GUZMAN: That's another point. No,
16 this is the point only that the -- the petition they
17 are going to request extra information for -- to
18 the -- from the members and say, "You have to mark an
19 X in this" -- let me see, I got the petition so I can
20 show it to you. There's two issue in the petition.

21 MR. MEGINNISS: Okay.

22 MR. GUZMAN: One -- one issue is the --
23 they don't follow, when they do the petition, the
24 Constitution. The Constitution say just put the name
25 of the candidate and put the -- the office that they

1 are running and that's it. And then in the bottom the
2 member who going to sign is requesting the -- the
3 signatures or -- but this officer of the Union on
4 Stand Together, they request something else. There is
5 no -- in the Constitution.

6 They request the -- to mark a check in
7 the -- in a square if they want to receive phone call,
8 if they want to receive e-mail, if they want to
9 receive a, you know, other call from somebody else.
10 So that is what I say, they are not respecting the
11 Constitution. If I do those things, maybe my petition
12 will be sent to be voided because I say, "You are not
13 following the Constitution."

14 MR. MEGINNISS: Okay. So what I'm
15 hearing you say is that by adding that box that said,
16 "Check this if you" --

17 MR. GUZMAN: The box and -- and the
18 explanation.

19 MR. MEGINNISS: "If you want us to
20 contact you," they're putting information in the
21 petition that is more than what the Constitution -- or
22 different than what the Constitution requires?

23 MR. GUZMAN: Yes.

24 MR. MEGINNISS: And the information --
25 but you agree that they put in enough information if

1 that box was left off?

2 MR. GUZMAN: Well, I -- I were
3 according to what the -- the Constitution require.

4 MR. MEGINNISS: Okay.

5 MR. GUZMAN: I don't say it's enough.
6 It's what the Constitution say.

7 MR. MEGINNISS: Okay.

8 MR. GUZMAN: The Constitution say "Put
9 your name and the office you are running."

10 MR. MEGINNISS: And they did more than
11 that, they --

12 MR. GUZMAN: They -- they put -- yes.
13 They put in here -- this is what it is. This is the
14 copy of the -- of the --

15 MR. MEGINNISS: Thank you. Thank you.
16 You're going to show this to me; right? Do you mind
17 if we mark this as an exhibit?

18 MR. GUZMAN: Yes. Yes.

19 MR. MEGINNISS: Let's mark this as
20 Exhibit 11.

21 (Exhibit 11 was marked for
22 identification.)

23 And this is a copy of one page of blank
24 Stand Together petition.

25 MR. GUZMAN: Yeah --

1 MR. MEGINNISS: So can we -- is it all
2 right if we --

3 THE REPORTER: Can we move that
4 microphone back for Mr. Guzman? It got rustled a
5 little bit. It's just causing a noise cancellation
6 issue. Thank you.

7 MR. MEGINNISS: Okay.

8 MR. GUZMAN: You mark this one what
9 number?

10 MR. MEGINNISS: Eleven.

11 MR. GUZMAN: Eleven.

12 MR. MEGINNISS: Yes, 11.

13 MR. GUZMAN: Okay.

14 MR. MEGINNISS: Let's wait for her to
15 come back with the copies.

16 MR. GUZMAN: Okay.

17 MR. MEGINNISS: I have two more areas
18 that I want to ask you questions about.

19 MR. GUZMAN: But --

20 MR. MEGINNISS: Yeah?

21 MR. GUZMAN: I haven't finished it with
22 the -- with the explanation of the petition.

23 MR. MEGINNISS: Okay. Let her come
24 back then.

25 (Discussion held off the record.)

1 MR. MEGINNISS: So Mr. Bekman, I just
2 want to make sure we're marking this last document
3 that was handed to us Exhibit 11. It is a --

4 THE REPORTER: Yes, Counsel. Thank
5 you.

6 MR. MEGINNISS: Okay.

7 Mr. Guzman, you have more to say about
8 the petition. Go ahead.

9 MR. GUZMAN: Yes. Yes. Okay. Yeah.
10 Okay. And the same thing in Article 7 of the
11 Constitution, what is called nomination and election.
12 In Section 1B, they also say how to write the -- make
13 the petition.

14 MR. MEGINNISS: I'm sorry, we're on --
15 what page is it of the Constitution?

16 MR. GUZMAN: This is the -- this is the
17 petition -- I mean the Constitution 2023. I don't
18 know you had that one because every --

19 MR. MEGINNISS: I do. I do. One B --
20 seven B. I got it. Page 13. Okay.

21 MR. GUZMAN: In B, they say how to do
22 the petition.

23 MR. MEGINNISS: Okay. "Each page of
24 the petition must be signed -- dated and signed"?

25 MR. GUZMAN: No, B. Which year

1 Constitution you have? That's the first point.

2 MR. MEGINNISS: B at the top?

3 MR. GUZMAN: No, no, the -- the
4 Constitution, what year is that one?

5 MR. MEGINNISS: I think it's 2023.

6 MR. GUZMAN: Okay. So I got --

7 MR. MEGINNISS: -- to me the section
8 that you want me to read?

9 MR. GUZMAN: Okay. I don't know if
10 something different.

11 MR. MEGINNISS: Okay. I see. I'm just
12 going to read this aloud, if that's okay.

13 MR. GUZMAN: Okay.

14 MR. MEGINNISS: "The election of
15 officers and other elected officials shall be made
16 from among those persons nominated. Nominations shall
17 be made in written petition, which shall designate the
18 name of the person and/or persons nominated and the
19 office and/or offices sought by the nominee and/or
20 nominees."

21 MR. GUZMAN: Yes.

22 MR. MEGINNISS: Is that the part you
23 wanted --

24 MR. GUZMAN: Yes. Yes.

25 MR. MEGINNISS: Okay.

1 MR. GUZMAN: Yes. So like I said, the
2 petition that the Stand Together provides to the -- to
3 the members and to the Election Committee doesn't
4 follow those rules for the petition.

5 MR. MEGINNISS: Because it has more
6 than that?

7 MR. GUZMAN: It has something that
8 doesn't follow.

9 MR. MEGINNISS: Okay.

10 MR. GUZMAN: Don't go according to
11 the -- to the Constitution. And the law say we have
12 to do an election according to the Constitution.

13 MR. MEGINNISS: Okay.

14 MR. GUZMAN: They have -- more or less
15 they have to be according with the Constitution and
16 that's my claim.

17 MR. MEGINNISS: I understand. You
18 understand your claim was rejected by the Department
19 of Labor last time?

20 MR. GUZMAN: We are not over there. We
21 are here today.

22 MR. MEGINNISS: Okay. All right.

23 MR. GUZMAN: We are here.

24 MR. MEGINNISS: Okay.

25 MR. GUZMAN: I don't know -- last time,

1 you -- you know, the vice -- the president of the
2 Union resigning after a year and a half.

3 MR. MEGINNISS: Yeah.

4 MR. GUZMAN: Okay. Why? Maybe he was
5 sick, but I saw him doing something else, you know;
6 so --

7 MR. MEGINNISS: I don't --

8 MR. GUZMAN: But we are not talking
9 about those things.

10 MR. MEGINNISS: I agree.

11 MR. GUZMAN: So don't -- don't mix.

12 MR. MEGINNISS: Okay.

13 MR. GUZMAN: Change the point.

14 MR. MEGINNISS: It's a fair point. But
15 let's -- is there something else about the petition
16 that you wanted to --

17 MR. GUZMAN: Yes. Yes. Yes. So and
18 we also say in the -- that the -- there are some
19 members running for a position that doesn't exist in
20 the Constitution.

21 MR. MEGINNISS: The name of the office
22 that's listed in the petition you're saying is
23 different from the way it is worded in the
24 Constitution?

25 MR. GUZMAN: Right. And -- and the

1 position was district board member and -- and the
2 petition that the Stand Together provided to the
3 member to sign was executive -- executive board
4 member, and we have no executive in the district. We
5 don't have executive position in the district. The
6 executive is in the -- in the officer that runs Union
7 wide and not in the district.

8 MR. MEGINNISS: You're saying it should
9 have said board member?

10 MR. GUZMAN: It had to be, according to
11 what is said the Constitution, district board member.

12 MR. MEGINNISS: I see.

13 MR. GUZMAN: And let me provide the
14 copy of the Article 6, officer, board, and delegate,
15 page 9.

16 MR. MEGINNISS: Page?

17 MR. GUZMAN: Nine.

18 MR. MEGINNISS: Of what? I'm sorry.

19 MR. GUZMAN: Of the Constitution.

20 MR. MEGINNISS: Okay. Yes. Okay.

21 MR. GUZMAN: I think the same
22 information is in -- in election nomination
23 brochure --

24 MR. MEGINNISS: The list of offices?

25 MR. GUZMAN: Yes.

1 MR. MEGINNISS: Is in the notice of
2 election as well?

3 MR. GUZMAN: Yes.

4 MR. MEGINNISS: Okay.

5 MR. GUZMAN: So -- so a -- claim in
6 there that those member -- I think there are 59 Union
7 wide in different districts. They are no -- are
8 running for a position that doesn't exist in the
9 Constitution and those members should not be allowed
10 to -- to run.

11 MR. MEGINNISS: Okay. I understand
12 your point. I understand the point you're making.

13 MR. GUZMAN: I just tried to follow the
14 law and the Constitution.

15 MR. MEGINNISS: Okay. Anything else?

16 MR. GUZMAN: The other issue was the --
17 the number of -- I mean, the number of members.

18 MR. MEGINNISS: Yes. We're going to
19 get to that in a moment.

20 MR. GUZMAN: Okay. Okay. Okay.

21 MR. MEGINNISS: Did you have something
22 else on this Ms. Brion?

23 MS. BRION: When it comes to the
24 signature for those who are in outstanding good
25 balance with the Union, it is not up to us to pay the

1 Union's due. Is the company that we work, they're the
2 one who's supposed to take from our check the Union's
3 due. So because I having an issue -- a matter of fact
4 with this, my company owes Union due and they forcing
5 me to pay and I keep fighting for four years already
6 because it's the company, the one who's supposed to
7 take out our check every month the Union due. So
8 those member who -- who are not in good standard,
9 that's the company, they are the ones who is behind to
10 pay the Union's dues.

11 MR. MEGINNISS: Okay.

12 MR. GUZMAN: No. But at the same time,
13 like I said, I told when -- when Hector Figueroa was
14 the secretary of the Union, I sent him a letter and I
15 complained to him that, that his job to collect
16 signature from member who are working in the building
17 over 30 days and he was not doing it. Even I say, "If
18 you don't do those things, the Union will lose money
19 and the International will lose money because they are
20 not receiving the 10 percent from the Union Local."
21 So I explain to him long ago, but we continue with the
22 same issue because it's, like, a -- we -- it's
23 important not to have everybody in the Union because
24 in that way, you know, we going to collect signature
25 and somebody say "You're in the Union? Yes." And

1 they sign it for us and they say, "Oh, that
2 signature's not valid." So that's another problem in
3 there.

4 MR. MEGINNISS: Okay. I understand
5 what you're saying. If I'm understanding correctly,
6 what you're saying is that, to the extent that
7 signatures were invalidated because of a failure to
8 pay dues or candidates were invalidated because they
9 didn't maintain continuous dues payments, that the
10 Union should have been -- the Union was responsible
11 for collecting those dues so it shouldn't be visited
12 on the heads of those people?

13 MR. GUZMAN: Yeah, because they were in
14 check off.

15 MR. MEGINNISS: Okay.

16 MR. GUZMAN: If they are in check off
17 or they are employee -- a new employee, the contract
18 say after 30 day you have to be paying dues.

19 MR. MEGINNISS: Yes. I understand.

20 MR. GUZMAN: So who's going to enforce
21 those things?

22 MR. MEGINNISS: Yeah.

23 MR. GUZMAN: Secretary or the treasurer
24 of the Union.

25 MR. MEGINNISS: You're aware that for

1 purposes of the signatures on the petition and
2 determining whether they were valid and for purposes
3 of a candidate running for office, if there was a gap
4 in dues payment but the member was on check off that,
5 that was excused and the person was found valid and
6 the candidate was found valid?

7 MR. GUZMAN: No. In my place there
8 were a few members there.

9 MR. MEGINNISS: I don't think you're
10 right about that. Okay. Let's move on.

11 MR. GUZMAN: Caballero -- Carlos
12 Caballero was one with them. They is in check off
13 for -- for many years and something happened, a few
14 months he didn't pay or -- and I was not able to run.

15 MR. MEGINNISS: I understand that
16 point. And actually, that's something the Committee
17 already knows about. So let's keep going on though.

18 MR. GUZMAN: Okay.

19 MR. MEGINNISS: Let's go now, if we
20 can, to the number of signatures -- I'm sorry, excuse
21 me, to the number of ballots.

22 MR. GUZMAN: Yes.

23 MR. MEGINNISS: And hold on one second.
24 (Discussion held off the record.)

25 MR. MEGINNISS: Let's take a break one

1 second.

2 MR. GUZMAN: Okay.

3 (Off the record.)

4 THE REPORTER: On the record.

5 MR. MEGINNISS: Mr. Guzman, I'll --

6 THE REPORTER: Yeah, I just wanted to
7 address that microphone. When the papers are
8 rustling, it's causing noise cancellation on Counsel
9 Meginniss when he speaks so I was just wondering if we
10 can keep an eye on that. I might have to interject,
11 and I apologize if I have to. Thank you.

12 MR. MEGINNISS: That's fine.

13 Mr. Guzman, the next charge that we
14 wanted to talk about was your questioning how there
15 could have been 186,150 -- whatever the number is --
16 ballots mailed out when in the 2023 LM-2, which was
17 filed in March of this year, of '24, there were only
18 151,000. So do you have anything more you want to say
19 about that or should we just -- I have a bunch of
20 questions.

21 MR. GUZMAN: No. I have one I want to
22 say.

23 MR. MEGINNISS: Go ahead.

24 MR. GUZMAN: Okay. This is the LM-2.

25 LM-2 is, like, income tax of the Union to the

1 Department of Labor and they have to do every year
2 around April to March. And they site say how much do
3 they spend the money on salary, to Feds, airplane,
4 everything, hotel, everything, how -- the salary
5 everybody. And I went to the Department of Labor to
6 get this -- a copy and they were sign it on -- I think
7 it was March 29, 2024. And they -- they say in this
8 paper the numbers of members.

9 MR. MEGINNISS: Let's mark that as an
10 exhibit. May we?

11 (Discussion held off the record.)

12 MR. MEGINNISS: The document that
13 Mr. Guzman has given us is marked Exhibit 12.

14 (Exhibit 12 was marked for
15 identification.)

16 And it is two pages from the 2023 LM-2
17 filed on behalf of 32BJ.

18 Mr. Guzman, go ahead.

19 MR. GUZMAN: So the LM-2 said that we
20 have full-time workers or members, one thousand
21 twenty-three, seven, seven hundred.

22 MR. MEGINNISS: 123,770?

23 MR. GUZMAN: Yes. I'm sorry. Yes.

24 And part-time, we have 28,528 and they're eligible to
25 vote. So that is -- was filed in -- in this year on

1 March 29th.

2 MR. MEGINNISS: Right.

3 MR. GUZMAN: Now, when we came to -- to
4 review the voting list, find now that the number went
5 to 186,056 members.

6 MR. MEGINNISS: Right. And that number
7 comes from the AAA certification.

8 MR. GUZMAN: Well, that's what was
9 provided by the -- by the Union.

10 MR. MEGINNISS: This document,
11 Exhibit 9; right?

12 MR. GUZMAN: What?

13 MR. MEGINNISS: In other words, the AAA
14 reports here that they mailed out a total of a hundred
15 and eighty-six thousand -- I'm doing this in my
16 head -- and fifty-six ballots?

17 MR. GUZMAN: Yes.

18 MR. MEGINNISS: Okay.

19 MR. GUZMAN: But my -- my issue was
20 that I came to the Union to -- to review the list of
21 members.

22 MR. MEGINNISS: Yeah.

23 MR. GUZMAN: And that's when I find out
24 there was 186,000 members, not exactly with the number
25 that you are providing right now. But I -- I saw

1 there was 186,000 when I review every district in the
2 whole Union, so I say that's a -- a lot of member
3 extra. So now with the -- with the document that
4 the -- the AAA provide, the -- the voting list was,
5 like, the number you tell, 186,056. Now, I deducted
6 151,000 from the LM-2, is 34,000 member extra that
7 they are voting.

8 Now, if I -- I go to the -- to the
9 document provided by AAA for the year 2021, the voting
10 in that time -- the mail out for this district, Metro
11 district, was 72,396 and the -- for this election was
12 93,211. That's around 19,000 extra members in the
13 district -- Metro district.

14 MR. MEGINNISS: Okay. We're going
15 to -- we don't have to stop now, but the document
16 you're reading from is the AAA certification from the
17 2021 election?

18 MR. GUZMAN: And the '23 and '24.

19 MR. MEGINNISS: We'll mark the 2021 as
20 an exhibit. We don't have to do it right now.
21 Let's -- we'll do it at a break. That'll become
22 Exhibit 13.

23 MS. BRION: Exhibit 13.

24 MR. MEGINNISS: In other words,
25 Mr. Guzman, you're saying that in the 2021

1 certification, AAA said they mailed out 93,000-plus
2 ballots to the New York Metro district -- I'm sorry,
3 70 -- say it again. Sorry.

4 MR. GUZMAN: No. In the year 2021 they
5 said in the Metro district they have 73,000 member,
6 639.

7 MR. MEGINNISS: Okay. And in 2024 --

8 MR. GUZMAN: 93,211.

9 MR. MEGINNISS: Okay.

10 MR. GUZMAN: That's a extra nineteen
11 five hundred -- I mean 19,572 members extra in the
12 district -- in the Metro district.

13 MR. MEGINNISS: Okay.

14 MR. GUZMAN: From the records of the
15 district.

16 MR. MEGINNISS: Understood. And your
17 point is?

18 MR. GUZMAN: The point is that the --
19 the LM-2 doesn't -- with the report of the mailed out
20 and there are 34,000 member extra that were mailed out
21 that we don't know where they came from. At the same
22 time, the LM-2 from the year 2022 and 2023, the
23 difference -- that the Union lost almost 800 members.

24 MR. MEGINNISS: Right.

25 MR. GUZMAN: From the -- I mean, '21

1 and '22. By the year '23, went up to -- I mean, in
2 the -- in the report.

3 MR. MEGINNISS: In 2024 in the election
4 we have 186,000, which is a lot more. Interesting.
5 And so --

6 MR. GUZMAN: So 34,000, so --

7 MR. MEGINNISS: Not to put words in
8 your mouth, but you're saying something doesn't sound
9 right there, more ballots were mailed out than they
10 should have been; that's the point you're making?

11 MR. GUZMAN: Well, I go according to
12 what the Union report to the --

13 MR. MEGINNISS: I see what you're
14 saying.

15 MR. GUZMAN: That's what I want.

16 MR. MEGINNISS: Okay.

17 MR. GUZMAN: Because now is the next
18 year in 2025, the Union have to say, "Yes, we have
19 186,000 members." And 86,000 members mean, like, a --
20 I don't know how many million more dollars in -- in
21 Union dues, they had to report it; so --

22 MR. MEGINNISS: Okay. More that you
23 want to say about this?

24 MR. GUZMAN: I don't think so.

25 MR. MEGINNISS: I want to now turn to

1 Lori Orme, who is the director of operations for 32BJ.

2 (Discussion held off the record.)

3 All right. Hold on one sec. Ms. Brion
4 is speaking again.

5 Go ahead. Question?

6 MS. BRION: Because I didn't want to
7 interrupt and I'm sorry, maybe I'm too late, but would
8 you like some names of coworkers that I have that they
9 never receive the ballot?

10 MR. MEGINNISS: Yes.

11 MS. BRION: Perfect.

12 MR. MEGINNISS: But I don't want you to
13 do it now unless you have to leave.

14 MS. BRION: No, no.

15 MR. MEGINNISS: I want to finish
16 this --

17 MS. BRION: I'll give it to you later.
18 Yeah. And you could call the -- they never got the
19 ballot. Okay.

20 MR. MEGINNISS: I promise. I'll ask
21 you that question.

22 MS. BRION: Okay.

23 MR. MEGINNISS: All right. So
24 Ms. Orme, I asked you to come today having seen this
25 protest from Mr. Guzman and he correctly points out

1 that ballots were mailed to 186,000 members who were
2 seen as eligible to vote because they got a ballot,
3 and yet at the -- in the December -- I'm sorry. In
4 the 2023 LM-2, there were only 152,000 members listed
5 as -- on the report to the LM-2. And so we want to
6 ask you questions about how that could be because that
7 seems like an enormous increase. So first of all,
8 what is the difference? How is the LM-2 number
9 derived, how is that figured out?

10 MS. ORME: The LM-2 basis per the DOL
11 is the number of member payers in the month of
12 December -- as of December 2023. So how many member
13 payers we received payments -- how many members we
14 received payments from in the month of December of
15 2023.

16 MR. MEGINNISS: 2023?

17 MS. ORME: Correct.

18 MR. MEGINNISS: All right. So I have a
19 bunch of questions about that. Does that include
20 members who are on a leave of absence from their jobs
21 and didn't pay dues in the month of December?

22 MS. ORME: No.

23 MR. MEGINNISS: Does it include people
24 who were terminated but there was a grievance pending
25 for their termination?

1 MS. ORME: If they didn't make a dues
2 payment, no.

3 MR. MEGINNISS: And just -- again, does
4 it include people -- most people in the Union pay
5 their dues by check off; right?

6 MS. ORME: Yes.

7 MR. MEGINNISS: And the employer then
8 sends in the check off remittance to the Union after
9 the dues are checked off?

10 MS. ORME: Yes.

11 MR. MEGINNISS: Does it happen that
12 employers don't pay in a given month?

13 MS. ORME: Yes.

14 MR. MEGINNISS: And then pay later?

15 MS. ORME: Yes.

16 MR. MEGINNISS: So if an employer
17 didn't pay in December of 2023, would all those
18 members for that employer not have been included in
19 the number for the LM-2?

20 MS. ORME: Correct. They would not
21 have been included in the December number.

22 MR. MEGINNISS: Now, I'm familiar with
23 this because I've been doing this for so damn long,
24 but there are a lot of people, particularly in New
25 York, who pay by hand; correct?

1 MS. ORME: Yes.

2 MR. MEGINNISS: And many of those
3 people paid by hand for months in advance?

4 MS. ORME: Yes.

5 MR. MEGINNISS: So if someone paid for
6 dues in July and paid through the next seven months,
7 there wouldn't be a dues receipt in December even
8 though the person had paid dues for that; right?

9 MS. ORME: Correct.

10 MR. MEGINNISS: And would that person's
11 be included in the LM-2 number?

12 MS. ORME: No.

13 MR. MEGINNISS: Okay. Now, members who
14 don't pay dues in a given month, they may -- they're
15 allowed to come back and pay back dues for that month;
16 right?

17 MS. ORME: Yes.

18 MR. MEGINNISS: And when they pay back
19 dues for that month, it doesn't -- if someone missed
20 December and then came in, in January or February to
21 pay back dues, that wouldn't have been -- that person
22 wouldn't have been in the December dues receipt count;
23 right?

24 MS. ORME: Correct.

25 MR. MEGINNISS: All right. When you

1 prepared the list of people for the AAA to -- were you
2 involved in preparation of the list of the people
3 who -- that we sent to AAA to get ballots?

4 MS. ORME: Yes.

5 MR. MEGINNISS: Did you include in
6 there people who may have missed a payment but made it
7 up?

8 MS. ORME: Yes.

9 MR. MEGINNISS: And did you include
10 people who were on leaves of absence but hadn't paid
11 dues during the leave but were still on a leave?

12 MS. ORME: Yes.

13 MR. MEGINNISS: And how about people
14 who were terminated and whose grievances were pending?

15 MS. ORME: They were included.

16 MR. MEGINNISS: And just so I'm aware,
17 if a person doesn't pay dues in a given month, do they
18 lose the right to vote because they didn't pay that
19 month?

20 MS. ORME: No. They're still eligible
21 to vote.

22 MR. MEGINNISS: Okay. But ultimately
23 they have to make up those due payments?

24 MS. ORME: Correct.

25 MR. MEGINNISS: How many months of dues

1 payments do you have to miss before you lose your
2 right to vote?

3 MS. ORME: Three -- more than three.

4 MR. MEGINNISS: And that's in the
5 Constitution?

6 MS. ORME: I believe so, yes.

7 MR. MEGINNISS: In the Union, between
8 January 1 of 2024 and the time you sent over the
9 mailing list to the AAA, was there any growth in the
10 Union membership during that time?

11 MS. ORME: Yes.

12 MR. MEGINNISS: And where was that
13 growth?

14 MS. ORME: In airports and in New
15 York -- in New York airports and New York security.

16 MR. MEGINNISS: Do you have some sense
17 of whether it was a lot or a little or --

18 MS. ORME: Well, from 2023 to 2024
19 there was a large growth. We brought in the private
20 shelters in security -- in New York security. That
21 was where the majority of the growth came in. And
22 also New York airports, we had growth there.

23 MR. MEGINNISS: And when you prepared
24 the mailing list to send to AAA, did you include
25 people who were not eligible to vote?

1 MS. ORME: No.

2 MR. MEGINNISS: Okay. Is there
3 anything else that we need to know to figure out the
4 difference between the 152 and the 186?

5 MS. ORME: No. Just that the DOL
6 requires number of payers and the requirement --

7 MR. MEGINNISS: In a given month?

8 MS. ORME: In a -- in the month of
9 December. Not a given month, in the month of
10 December.

11 MR. MEGINNISS: I see.

12 MS. ORME: And that's the number of
13 member payers we had for the month of December.

14 MR. MEGINNISS: But that didn't
15 necessarily include all the people who were eligible
16 to vote in December?

17 MS. ORME: No.

18 MR. MEGINNISS: Okay.

19 Yes?

20 MR. GUZMAN: Can I ask a question?

21 MR. MEGINNISS: You can ask me to ask
22 the question.

23 MR. GUZMAN: Okay. What I've been
24 speaking is the numbers.

25 MR. MEGINNISS: I'm sorry?

1 MR. GUZMAN: I've been speaking
2 about --

3 THE REPORTER: Counsel, I need the
4 microphone. I'm so sorry.

5 MR. GUZMAN: What I've been speaking
6 here is numbers, exactly numbers, not in general. I
7 got airport, the airport that is some number. I got
8 somebody in sick leave, some number, but no number.
9 So I want a specific number, like we had to cover
10 34,000 members. Where are the 30,000 member? You
11 have to give me a list. Airport, we added one member
12 or we added 10,000 members?

13 MR. MEGINNISS: Okay. Well, we're not
14 prepared to do that.

15 MR. GUZMAN: Okay. But I want to --

16 MR. MEGINNISS: Do you have numbers
17 like that on growth and --

18 MS. ORME: I'm sure I can find it. I
19 could get it.

20 MR. MEGINNISS: All right. Then why
21 don't you go find it?

22 MS. ORME: -- numbers on growth.

23 MR. MEGINNISS: Yeah.

24 MS. ORME: I don't know specifically
25 it's relation to this, but yeah.

1 MR. MEGINNISS: Yeah.

2 MR. GUZMAN: Because of the -- what we
3 talking about, the LM-2 we talking about, like I just
4 said, from January 1st until December 12th.

5 MR. MEGINNISS: No. You just said no,
6 that you're not talking about December.

7 MR. GUZMAN: No, I mean the -- I
8 talking about the LM-2 report.

9 MR. MEGINNISS: Right.

10 MR. GUZMAN: The LM-2 report is from
11 January 1st until December 31st. During those months,
12 where are those member not paying dues and later on
13 pay?

14 MR. MEGINNISS: Well, I think you
15 misunderstand what you said. I think if -- and maybe
16 I misunderstood. But I understood that when you
17 filled in that box for the number of members on the
18 LM-2, it was only the people who had paid dues in
19 December of 2023.

20 MS. ORME: That's correct.

21 MR. MEGINNISS: Not January through
22 December --

23 MS. ORME: Correct.

24 MR. GUZMAN: So there is no accurate
25 report to the Department of Labor how many member are

1 paying the dues because only I pay on December?

2 MR. MEGINNISS: That's right.

3 MR. GUZMAN: But is not exactly, the --
4 the report.

5 MR. MEGINNISS: Well, that's --

6 MR. GUZMAN: Because of the -- the
7 money that they are reporting to the government, it's
8 according to how many -- how many member are in there.

9 MR. MEGINNISS: Well, that's not for
10 her. She doesn't -- she's just telling you what she
11 did; right? And you have an argument about what the
12 LM-2 means, you should make the argument.

13 MR. GUZMAN: No. My argument is
14 what -- what you said to -- I'm asking her how many
15 members there took a leave of absence and you put it
16 back to them. How many member are in the airport, do
17 you put it back to them? But you understand how many
18 members. So in here I'm missing 34,000 members so
19 they have to be --

20 MR. MEGINNISS: I understand.

21 MR. GUZMAN: -- the numbers. Yes, we
22 have some members in the -- in the airport or we have
23 some security guard.

24 MR. MEGINNISS: I hear what --

25 MR. GUZMAN: We have -- we have

1 everywhere.

2 MR. MEGINNISS: I hear what you're
3 saying.

4 MR. GUZMAN: I wanted numbers.

5 MR. MEGINNISS: Well, you're entitled
6 to make demands, but that's not really for the
7 Election Committee. They ask you to answer your
8 questions. You're here to answer our questions.

9 MR. GUZMAN: Yeah, but you're bringing
10 her as a witness.

11 MR. MEGINNISS: I think your point --
12 well, she's going to actually try and find some
13 numbers. But I think your point is you're not
14 satisfied that the explanation that she's offering
15 about the difference between the two numbers covers
16 the \$34,000 -- the 34,000 member difference and you
17 would prefer to have it broken down point by point.

18 MR. GUZMAN: Right.

19 MR. MEGINNISS: And I don't --

20 MR. GUZMAN: -- the numbers.

21 MR. MEGINNISS: I appreciate that and
22 we'll determine whether we can do that.

23 MR. GUZMAN: Well, that is the -- the
24 point. The point isn't --

25 MR. MEGINNISS: No, Mr. Guzman. The

1 point is that ballots should be mailed to members who
2 are eligible to vote no matter what number was put on
3 the LM-2. They should not be sent to people who are
4 not eligible to vote. And you're suggesting that
5 because the LM-2 number was lower than that, there
6 were some who were not eligible to vote who got
7 ballots. And what she is saying is that's not true.
8 And she has the --

9 MR. GUZMAN: -- report the American
10 Arbitration Association, they are given two big
11 numbers differing.

12 MR. MEGINNISS: I understand.

13 MR. GUZMAN: There are -- nobody are
14 covering.

15 MR. MEGINNISS: I understand.

16 MR. GUZMAN: They just covering that we
17 have in the security, we have in -- we have -- doesn't
18 cover them.

19 MR. MEGINNISS: I think the problem is
20 though that whatever number the Union put on the LM-2,
21 it can't not send ballots to people who are eligible,
22 even if that number is higher than what's on the LM-2.
23 They have to. The law and the Constitution require
24 it.

25 So let's do this. This is just --

1 we're just going back and forth and we're not going to
2 settle that here.

3 I think, Ms. Brion, you now had
4 something you wanted to add on?

5 THE REPORTER: I'm sorry, I need the
6 mic on her. I'm sorry.

7 MR. MEGINNISS: Go ahead.

8 MS. BRION: Okay. And I apologize if
9 I'm not quite understanding, but I understand the fact
10 there is over 34,000 members that we can count where
11 they are from. But then at the same time, I have a
12 list of members that they didn't receive the ballot.
13 So who has receive it, other members, those people?
14 And why the members, they didn't receive it, some of
15 them? It's strange. I don't know, I'm trying to
16 understand.

17 MR. MEGINNISS: And that's helpful
18 because that's what I wanted to ask you about. You
19 said that there were members in your workplace who did
20 not receive members [sic]?

21 MS. BRION: Yes.

22 MR. MEGINNISS: And what are those
23 members' names?

24 MS. BRION: I can write it down. Maria
25 Javier.

1 MR. MEGINNISS: J-A-V-I-E-R?

2 MS. BRION: Yes.

3 MR. MEGINNISS: Okay.

4 MS. BRION: Marcia Garcia.

5 MR. MEGINNISS: Marcia Garcia. And can
6 you also just tell us who your employer is?

7 MS. BRION: The company?

8 MR. MEGINNISS: Yeah. Or the work
9 location.

10 MS. BRION: It's called N-N.

11 MR. MEGINNISS: N-N?

12 MR. GUZMAN: N-I-N.

13 MS. BRION: N-I-N.

14 MR. MEGINNISS: N-I-N? Okay. And
15 what's the location?

16 MS. BRION: They're in 200 Park Avenue.

17 MR. MEGINNISS: Park Avenue. Okay.

18 MS. BRION: Let me just make sure.

19 MR. GUZMAN: That's the office.

20 MS. BRION: Yeah.

21 I mean, are you asking the main office?

22 MR. MEGINNISS: The work location.

23 MS. BRION: Oh. The work location is
24 66 Hudson Yards.

25 MR. MEGINNISS: 66 Hudson Yards. Okay.

1 MS. BRION: Correct.

2 MR. MEGINNISS: And who else?

3 MS. BRION: Okay. Maria Javier, Marcia
4 Garcia, and I have Mike -- let me see if I have the
5 last name. Mike, I think his last name is Ewell.

6 MR. MEGINNISS: How do you spell?

7 MR. GUZMAN: E-W-E-L-L.

8 MS. BRION: I'm not sure, but I think
9 that's his last name.

10 MR. MEGINNISS: Okay.

11 MS. BRION: And is another one. I
12 don't have it here in the list because he started
13 month later, his name is Manny.

14 MR. MEGINNISS: Manny?

15 MS. BRION: Yes.

16 MR. MEGINNISS: Okay.

17 MS. BRION: And I -- I don't have the
18 last name, but those are so far some of the people I
19 spoke. I didn't spoke with everybody, which is over,
20 like, 40, 50 people working there.

21 MR. MEGINNISS: And they told you that
22 they didn't receive a ballot?

23 MS. BRION: Correct. I -- I call. And
24 matter of fact, to confirm, I -- I send an e-mail the
25 16th.

1 MR. MEGINNISS: To who?

2 MS. BRION: The 16th, that e-mail --

3 MR. MEGINNISS: Yeah, 16th of
4 September.

5 MS. BRION: Yeah. I send that and then
6 I called them back the next day, the 17th to make
7 sure, and the 18th to make sure. "Did you guys got
8 it. Did you guys send?" You know, and they still
9 didn't get it. Even with the letter that I sent to
10 brother Manny Pastreich, the -- the --

11 MR. MEGINNISS: Let me ask you a
12 question. Ms. Hamelius mentioned to me that you came
13 with Mr. Guzman to the review of the list -- the
14 mailing list?

15 MS. BRION: The -- the counting for
16 the -- the paper?

17 MR. MEGINNISS: No. No, the time when
18 you looked at the --

19 MS. BRION: Yeah, yeah, yeah.

20 MR. MEGINNISS: And she said to me that
21 at that time you mentioned to her that -- someone
22 mentioned to her that some people hadn't received
23 ballots and she gave you the number of the AAA for
24 people to call and request.

25 MS. BRION: Yes. I did and I send it

1 and they still --

2 MR. MEGINNISS: Did you --

3 MS. BRION: I -- I have the number and
4 everything that I sended.

5 MR. MEGINNISS: Did you tell these
6 members that number?

7 MS. BRION: Yes.

8 MR. MEGINNISS: And do you know whether
9 they called?

10 MS. BRION: Yes. And they never got
11 anything.

12 MR. MEGINNISS: Okay.

13 MR. GUZMAN: And I call --

14 MR. MEGINNISS: We can check with the
15 AAA to determine whether they in fact called. The
16 reason you think they called is because they told you
17 they called?

18 MS. BRION: Yes.

19 MR. MEGINNISS: Okay.

20 MR. GUZMAN: I also called that number
21 and I asked the person who respond from the AAA that
22 they're supposed to send the -- the ballot by Federal
23 Express because of the short timing in -- in the mail
24 going to the members and come back to the -- to the
25 AAA, and I requested that they do expedited mail by

1 triple -- I mean by the FedEx.

2 MR. MEGINNISS: Okay.

3 And do you know whether these members
4 ever received a ballot? Did they receive one after
5 the 19th?

6 MS. BRION: I just spoke with one
7 yesterday and no.

8 MR. MEGINNISS: Okay.

9 MS. BRION: Marcia.

10 MR. MEGINNISS: Okay.

11 MS. BRION: She still haven't receive
12 it. I haven't spoke with the rest. Maria and Marcia,
13 those are the two people that I spoke yesterday.

14 MR. MEGINNISS: Okay. We can be in
15 touch with the AAA to find out whether in fact they
16 got these calls because they keep up a record of them,
17 as we understand it, and we will do that.

18 MS. BRION: Okay.

19 MR. MEGINNISS: Anybody else that you
20 know of?

21 MS. BRION: I -- I didn't spoke with
22 everybody, so this is the -- some of them. But if it
23 happens with some, I'm -- I'm sure the number is
24 bigger, but I don't have access to -- to speak to any
25 of them.

1 MR. MEGINNISS: Okay. And in your -- I
2 think it was the e-mail, you mentioned that there was
3 a Rogelio --

4 MS. BRION: Rogelio Walker. He --

5 MR. MEGINNISS: Rogelio Walker.
6 R-O-G-E-L-I-O, Walker?

7 MS. BRION: Yes.

8 MR. MEGINNISS: Who is that? A staff
9 member of the Union?

10 MS. BRION: Yes. And he is -- he runs
11 the section, the Hudson Yards.

12 MR. MEGINNISS: I see.

13 MS. BRION: So he's the supervise
14 agent.

15 MR. MEGINNISS: And what --

16 MS. BRION: Delegate, whatever you want
17 to call, he is the one who run all those business. He
18 saw me outside because we came across and he question
19 me, what I was doing there, because right now I'm not
20 in the building. And I told I'm -- I'm getting
21 signatures. And he was doing the same thing. So some
22 of my coworkers, which I had a very good relation,
23 many of them, they didn't want to sign. And they're
24 like, "No, somebody brought" -- and this was by Manny.
25 He's the one who inform me that the only list they

1 brought to the building, it says Manny Pastreich. So
2 I'm, like, I got them outside to sign my petition.
3 I'm, like, "I see you guys didn't sign that one. Can
4 you guys please sign this one?" And Rogelio was the
5 one who brought those vote -- the list for signatures
6 to the building and then a week later he resigned.
7 And those are the people that they -- you know,
8 receive the votes for election.

9 MR. MEGINNISS: Sorry. I just am
10 missing the connection between his resignation and the
11 people not getting ballots.

12 MS. BRION: Because I was very close in
13 the building with all my coworkers.

14 MR. MEGINNISS: Yes.

15 MS. BRION: They're new members. They
16 don't know much about how Union works and everything.
17 And the fact that I was informing them, you know, the
18 rights and how everything goes, you know, Rogelio was
19 very against me doing this stuff. So I feel like when
20 it came to the petitions that I was signed, since he
21 knew what I was doing he went ahead in the building
22 because I cannot go inside the building, I had to wait
23 outside. And they informed me the only paper they
24 saw, which is Manny, it was only the paper that they
25 see, it was Manny Pastreich. And I inform them, "No,

1 you guys have two candidates to -- to pick -- to -- to
2 vote." I was trying to be fair for them and for us,
3 you know, for the Union and -- and for our member.
4 And they're like, "Okay." And they were hesitating
5 to -- to sign. But we have a history with Rogelio
6 Walker, of him stopping me for doing the things from
7 the Union and things like that, so he was always
8 putting obstacles, you know.

9 MR. MEGINNISS: Okay. Well, when did
10 he resign?

11 MS. BRION: Very recently.

12 MR. MEGINNISS: Okay. I'm just trying
13 to follow --

14 MS. BRION: Yeah. It was around
15 August. A month, a month and a half maybe. And it
16 was all around the election thing.

17 MR. MEGINNISS: When you -- sorry.

18 MS. BRION: So -- no, no, it's okay.
19 So the fact that I have a good relation in the
20 building with the workers and everything, that's why I
21 felt that it was a conflict of interest of him.
22 Whatever he has said or done inside the building, I'm
23 not inside the building. But for the members to give
24 me the information that the only list they saw, it was
25 this, and then him resigning only that building where

1 I have worked and interact but not the other building,
2 I feel like something took place.

3 MR. MEGINNISS: Let me ask you a
4 question, if I may.

5 MS. BRION: Sure.

6 MR. MEGINNISS: You said that you're
7 not in the building now. Are you laid off or --

8 MS. BRION: Yeah. They're in
9 litigation.

10 MR. MEGINNISS: What is it?

11 MS. BRION: Litigation. They're
12 arbitrating for my --

13 MR. MEGINNISS: Arbitrating for your
14 discharge?

15 MS. BRION: Yeah.

16 MR. MEGINNISS: When were you
17 discharged?

18 MS. BRION: May or June. I -- I will
19 have --

20 MR. MEGINNISS: May or June of this
21 year?

22 MS. BRION: Yeah.

23 MR. GUZMAN: Yeah.

24 MS. BRION: Yes.

25 MR. MEGINNISS: Have you paid due since

1 then?

2 MS. BRION: Oh, yeah.

3 MR. MEGINNISS: You have?

4 MS. BRION: Yes. I'm up to that.

5 I'm -- now I -- after finishing, I got to go and pay
6 the one for my last month.

7 MR. MEGINNISS: Okay.

8 MS. BRION: I know when I'm outside,
9 that we are not working, we pay our Union due. But
10 when we are working, is the company in charge to
11 remove that from our check.

12 MR. MEGINNISS: I understand your
13 point. Yeah. Thank you. I have one more area I want
14 to talk to you about.

15 (Discussion held off the record.)

16 MR. MEGINNISS: When you -- these four
17 people who didn't get ballots, you said they were --
18 maybe I misunderstood, but were they -- are they new
19 members?

20 MS. BRION: Well, new two years.

21 MR. MEGINNISS: Two years. Okay.

22 MS. BRION: A year and a half, two
23 years.

24 MR. MEGINNISS: And when you inspected
25 the list with Mr. Guzman, did you find their names on

1 the list?

2 MS. BRION: It was one that I didn't
3 find, and I'm trying to remember now, which I was
4 pretty surprised because we going through the names
5 and I was -- I know I wanted to look to see if some of
6 my coworkers were there and I was surprised to be
7 missing one. And I cannot remember right now what --
8 I -- I pointed to them. I'm like, "Is one coworker
9 mine missing?"

10 MR. MEGINNISS: And the other three
11 were on the list but one wasn't?

12 MS. BRION: Well, I didn't check the
13 other -- the other one because I don't know the last
14 name.

15 MR. MEGINNISS: Yeah.

16 MS. BRION: I know about the name.

17 MR. MEGINNISS: The other two?

18 MS. BRION: But the other two, yes,
19 they were.

20 MR. MEGINNISS: But they told you they
21 didn't receive a ballot?

22 MS. BRION: No, they didn't. And I
23 called them yesterday. I called two of them.

24 MR. MEGINNISS: Okay.

25 MS. BRION: So and they were still, no,

1 they never got anything.

2 MR. GUZMAN: Maybe next election.

3 (Discussion held off the record.)

4 MR. MEGINNISS: There's another
5 question that -- I want to ask you this. You
6 mentioned that if the employer failed to send in dues
7 for all the employees in that shop or whatever in
8 December, that those people whose dues have been
9 checked off would still not have been counted because
10 there was no dues receipt.

11 UNIDENTIFIED SPEAKER: I'm so sorry.
12 Could we move the mic over?

13 MR. MEGINNISS: You understood?

14 MS. ORME: If the employer did not make
15 a payment for that member in the month of December,
16 they would not be included in the count of member
17 payers for the month of December.

18 MR. MEGINNISS: But going back to it,
19 the way that you prepared the list for AAA, if the
20 employer didn't pay for the month of December but the
21 individual was on check off, that member would still
22 be on the list as eligible to vote?

23 MS. ORME: Correct.

24 MR. MEGINNISS: Okay.

25 MS. ORME: For AAA, yes. For the LM,

1 no.

2 MR. MEGINNISS: Okay.

3 MR. GUZMAN: -- December?

4 MR. MEGINNISS: Yeah.

5 MR. GUZMAN: Okay.

6 MR. MEGINNISS: But the same thing is
7 true for June. If the member was on check off and
8 didn't pay for June, you wouldn't have said that, that
9 person is ineligible, you would've said that person's
10 eligible and put them on the list?

11 MS. ORME: That is correct.

12 MR. MEGINNISS: Okay.

13 Okay. I want to ask you about one more
14 area, Mr. Guzman.

15 And then I'm going to ask Ms. Baker,
16 who's here for the Stand Together team, if they
17 have -- if they want to say -- about what you've
18 raised or if --

19 The last thing I want to ask you about
20 is in the June 18th letter that you wrote to -- I
21 believe it's John Santos and we have marked it
22 Exhibit 10. On the second page, you say "Circa May
23 2024, the president and the secretary/treasurer signed
24 checks to pay hundreds of dollars to shop stewards and
25 gave the list of buildings to collect signatures for

1 the Stand Together slate petition and intimidate,
2 harass, and obstruct members of Local 32BJ in signing
3 the petitions for our slate." I'd like you to tell us
4 what that is based on. What's the knowledge that you
5 have of that, what happened, what do you know?

6 MR. GUZMAN: What I know is that the --
7 that the shop steward receive the money around --
8 around several -- I mean, May or -- or June they
9 receive the money.

10 MR. MEGINNISS: You're not sure which
11 month it was or --

12 MR. GUZMAN: No. No. No, I'm not
13 sure. I know in the past, in the other election,
14 there was a -- a shop steward that was running with me
15 that the Union didn't know or the officer didn't know
16 he was running with me. They told him -- they gave
17 him the check and they gave him the list -- of the --
18 of the building he had to collect signature in six
19 building and they give the number of members in each
20 building.

21 MR. MEGINNISS: What was the name --

22 MR. GUZMAN: I remember -- and I
23 remember asking the -- the Union to provide me the
24 same list that they provided to -- to the shop steward
25 that's supposed to be collecting in those building for

1 the officers of the Union. And I asked the same
2 treatment but they deny it to me. So I know in this
3 year --

4 MR. MEGINNISS: Wait. Just on that,
5 that happened in this election or in the --

6 MR. GUZMAN: No. The information was
7 in the other election, yes.

8 MR. MEGINNISS: Okay. And what
9 happened this year?

10 MR. GUZMAN: And this year, I know that
11 they -- they receive the same check on around the same
12 time, provide them with the list because I -- when I
13 was collecting signatures, one shop steward told me
14 that the Union give the list of the building that he
15 had to collect it.

16 MR. MEGINNISS: Who is that?

17 MR. GUZMAN: I don't know his name, but
18 it was in -- in 3rd Avenue in the residential building
19 around -- I think it's 36th, 37th Street. He told me
20 he had to collect the signature that was on the
21 building that he was assigned.

22 MR. MEGINNISS: And he told you that he
23 got the list at the time that he got his check?

24 MR. GUZMAN: Yes. Yes. Yes. And then
25 I got another shop steward --

1 MR. MEGINNISS: But you don't know his
2 name?

3 MR. GUZMAN: No. Then I got another
4 shop steward in Park Avenue, almost around the same
5 area because I -- I was doing that area. One was in
6 3rd Avenue, the other was in Park Avenue. He told me
7 the same thing because I went to --

8 MR. MEGINNISS: And what's his name?

9 MR. GUZMAN: I don't know this name.
10 So I explained to him the situation, that we have an
11 election and that we had the right to collect
12 signature, but the Union doesn't provide us with the
13 list of the buildings or the list of how many member
14 are in each building. But since they are shop steward
15 they are being provided with that information from the
16 officer of the Union.

17 MR. MEGINNISS: And in this instance --
18 second instance, you're also saying that he got the
19 list at the time that he got the --

20 MR. GUZMAN: Yes. Yes.

21 MR. MEGINNISS: And that's because he
22 told you that?

23 MR. GUZMAN: Yes.

24 MR. MEGINNISS: But you weren't -- but
25 you don't know his name?

1 MR. GUZMAN: No. No, I don't. I don't
2 ask something that -- you know, I -- I understand
3 the -- the way the -- the office operated, you know,
4 to -- to control the -- the election and to -- you
5 know, to provide the information there is going to be
6 an election. No -- no -- they don't send the notice
7 of the election to everybody, they don't make
8 advertising like they make advertising for the -- for
9 the election of the country. "Oh, we have an election
10 you have to vote for." No. In the Union election,
11 it's quiet. Everybody's quiet, you know?

12 And we are requesting something, they
13 deny. We protested something, they deny. And at the
14 same time, the lawyers or the -- or the officer -- the
15 lawyer of the Union -- lawyers of the Union -- not
16 lawyers, or the officer for the Union, so they are
17 also in that way not acting they're supposed to be
18 acting because the client is the Union and the Union
19 are the members, not the officers.

20 MR. MEGINNISS: Okay. Do you have any
21 more information on this point about what you just
22 told?

23 MR. GUZMAN: No, no, no, no.

24 MR. MEGINNISS: Okay.

25 MR. GUZMAN: I want to ask you

1 something, too.

2 MR. MEGINNISS: Hang on one sec, if you
3 don't mind.

4 MR. GUZMAN: Okay.

5 (Discussion held off the record.)

6 MR. MEGINNISS: Mr. Guzman, you had
7 something else?

8 MR. GUZMAN: Yes. Oh, I want to know
9 if I can get a copy of the -- of the transcript.

10 MR. MEGINNISS: Yes. It will be posted
11 on the website; okay? And it's -- we're going to ask
12 for expedited copy and it will be put up there as soon
13 as we get it. The election tab on the website.

14 MR. GUZMAN: I -- I want to add
15 something, too. Because I requested from the Union to
16 provide me with copy of the Constitution -- 40 copy of
17 the Constitution and the copy of every -- every
18 contract that the Union negotiate with employers from
19 the whole Union.

20 MR. MEGINNISS: Yes.

21 MR. GUZMAN: And they told me I don't
22 have the right.

23 MR. MEGINNISS: Yes.

24 MR. GUZMAN: I told I had the right
25 because we are a member of the Union, we're supposed

1 to get a Constitution. Every member subscribe the
2 Constitution. At the same time I was running for be a
3 president of the whole Union. Not of the -- of the
4 contract -- or the commercial building contract there,
5 I work in the commercial building. So I request in
6 writing to provide me those things and they said, "No,
7 you have no right to."

8 MR. MEGINNISS: I think actually -- we
9 can get into this, but my understanding is that on
10 August 27th you were sent a letter and -- with as an
11 attachment the copy of the Constitution and you were
12 sent copies of the collective bargaining agreements
13 that covered your work.

14 MR. GUZMAN: No. I asked for the
15 whole -- every contract --

16 MR. MEGINNISS: I think the question of
17 whether you're entitled to copies of the collective
18 bargaining agreements of all the other places is a
19 question of law, and I regret to inform you that the
20 courts have held you're not.

21 MR. GUZMAN: But -- but the thing --
22 the same thing we -- we talking about the -- that
23 the -- that the office of the Union provide every
24 member with the list of the -- of the -- or -- or the
25 buildings with this just so I had to collect signature

1 with the names of the every -- and they are getting
2 whatever they needed for themselves but they are not
3 providing to the other group.

4 MR. MEGINNISS: Well, that is wrong.

5 MR. GUZMAN: Okay.

6 MR. MEGINNISS: It shouldn't be --

7 MR. GUZMAN: At the same time, in many
8 election, but I requested the Constitution and they
9 provide it to me in -- in the mail, Constitutions.
10 They -- they give me the Constitution that I
11 requested.

12 MR. MEGINNISS: Well, wait. Didn't you
13 get a copy of the Constitution in the mail?

14 MR. GUZMAN: No.

15 MR. MEGINNISS: Didn't you get an
16 e-mail with a copy of the Constitution attached to it?

17 MR. GUZMAN: I want it in -- I want it
18 in paper, not in e-mail. I have the right to get a
19 Constitution.

20 MR. MEGINNISS: I see. So you object
21 to the fact that you didn't get it in a paper --

22 MR. GUZMAN: No, I have to get it -- I
23 request it in paper. I don't request an e-mail. I
24 had the right -- I think by the law I had the right
25 to -- to get a copy of the Constitution.

1 MR. MEGINNISS: Okay. You do. And
2 under the law, the Union is entitled to give it to you
3 in the form that they gave it to you. But that's
4 okay. That's a different question and I --

5 MR. GUZMAN: Yeah. But let's say
6 you -- you provide a member, they don't have a
7 printer. What -- what does it mean? It cannot have
8 something to read, we have to be watching the --
9 the -- in the -- in the screen --

10 MR. MEGINNISS: You do have access to a
11 printer.

12 MR. GUZMAN: Well, sometimes you have
13 to buy ink. You know how much it cost, the ink?

14 MR. MEGINNISS: Okay.

15 MR. GUZMAN: A hundred dollars.

16 MR. MEGINNISS: I understand. Anything
17 else? I don't want to -- okay.

18 MR. GUZMAN: No. Only the -- the
19 transcript.

20 MR. MEGINNISS: Yes.

21 MR. GUZMAN: Or it's going to put me in
22 the -- in the --

23 MR. MEGINNISS: It will be on the
24 website.

25 MR. GUZMAN: But can I get a copy?

1 MR. MEGINNISS: You're going to have to
2 use your printer again.

3 MR. GUZMAN: I cannot get a copy?

4 MR. MEGINNISS: No. But if you are
5 done, I want to ask --

6 MR. GUZMAN: Yes. Yes.

7 MR. MEGINNISS: -- Ms. Baker to say
8 what she has to say.

9 MR. GUZMAN: Okay.

10 MR. MEGINNISS: It's now 12:30. I
11 don't know how much time you have. If you all want a
12 break for a short time, we can do that. We can --
13 people can have lunch or what have you. I'll leave it
14 up to you all whether you want to keep going.

15 UNIDENTIFIED SPEAKER: I'll defer to
16 this group.

17 MR. MEGINNISS: Well, I'd be happy to
18 have lunch myself, but I don't want to impose on other
19 people. I know you all have to work and I --

20 MR. GUZMAN: No, I want to continue.

21 MR. MEGINNISS: You want to continue?

22 MR. GUZMAN: Yes.

23 MS. BRION: One thing to -- you know
24 how you have many people from buildings and you have
25 asked the name? Some people, they're scared to give

1 the name because they get later on retaliate by the
2 supervise, which it has very tight Union ties with the
3 delegates. You know, people who goes from the Union
4 to their building. They grow, you know, a friendship
5 or whatever they want to call. So whatever favor one
6 ask, if is not according to the Union, we get
7 punished. So I hope none of those people get
8 retaliate you going to call and I hope they're okay
9 because they're more than willing to -- to speak. But
10 some people not give their name because there will be
11 threats, you know, or putted -- putted more work to
12 do, make it very hard for them. And this is not
13 something new, this been going on for years.

14 MR. MEGINNISS: So Ms. Brion, you
15 should know, we don't have any intention of calling
16 them.

17 MS. BRION: Okay.

18 MR. MEGINNISS: And we --

19 MS. BRION: It's just the fact I give
20 you the names, you know, and they have it. I want to
21 make sure that nothing happens to them.

22 MR. MEGINNISS: And we as an Election
23 Committee have a very limited job. It's only about
24 whether the election should be overturned. That's the
25 only thing we do. And I am sorry we have to ask these

1 questions.

2 MS. BRION: No, it's okay.

3 MR. MEGINNISS: We do because
4 overturning an election is a very big deal. It's very
5 costly and it has -- if we're going to do that, it has
6 to be based on something very solid. That's why we
7 ask these questions. And you've made a number of
8 points today that we have to talk about and we have to
9 think about.

10 MS. BRION: Okay.

11 MR. MEGINNISS: Yes?

12 MR. GUZMAN: Can I asked, now that you
13 say it costs, how much you pay to -- to the AAA, how
14 much you pay to the printer, how much you pay for the
15 mail?

16 MR. MEGINNISS: I don't know the answer
17 precisely, but I believe it's all more than \$500,000.

18 MR. GUZMAN: Can we get a copy of those
19 costs?

20 MR. MEGINNISS: I don't know the answer
21 to that either.

22 MR. GUZMAN: But we are -- you are
23 talking about overturning election costs lot of money.

24 MR. MEGINNISS: It costs a lot of
25 money.

1 MR. GUZMAN: I don't know how much it
2 cost, democracy.

3 MR. MEGINNISS: I don't really know
4 exactly how much it costs. I know it costs a lot of
5 money.

6 MR. GUZMAN: But you know how much it
7 cost, democracy?

8 MR. MEGINNISS: I do.

9 MR. GUZMAN: Okay.

10 MR. MEGINNISS: I do.

11 MR. GUZMAN: Okay.

12 MR. MEGINNISS: Democracy is worth it.

13 MR. GUZMAN: Okay.

14 MR. MEGINNISS: Yeah.

15 So Ms. Baker, if you're okay to start,
16 let's start. And if it's going to go -- if we're
17 tracking time, maybe we'll get -- exhibit -- copy --

18 Did we get all the exhibits were were
19 going to copy?

20 UNIDENTIFIED SPEAKER: Not yet. There
21 is --

22 MR. MEGINNISS: Yes, that's the 2021
23 and 2023 AAA certifications, 12 copies.

24 MR. MEGINNISS: Yes, you can go. Thank
25 you, Lori.

1 MS. ORME: Thank you.

2 (Discussion held off the record.)

3 MS. BAKER: What number is this?

4 MR. MEGINNISS: That is --

5 MS. BAKER: Eleven?

6 MR. MEGINNISS: Thirteen.

7 MS. BAKER: Thirteen.

8 THE REPORTER: Counsel, when they're
9 moving microphones, part of what you said cut out.
10 Are you introducing Exhibit 13 now?

11 MR. MEGINNISS: I am.

12 (Exhibit 13 was marked for
13 identification.)

14 And it is two pages.

15 THE REPORTER: Thank you.

16 MR. MEGINNISS: One page is from the
17 AAA certification of the election in 2024 and the
18 other is one page from the AAA certification of the
19 election in 2021.

20 (Discussion held off the record.)

21 MR. MEGINNISS: Elizabeth, I think
22 we're waiting for you. You just --

23 MS. BAKER: Oh, sorry. I didn't
24 realize we were back on the record. I'm ready
25 whenever. There are folks caucusing out there. I

1 don't --

2 MR. MEGINNISS: Okay. So let's wait
3 for them to get back from the restroom.

4 MS. BAKER: Oh, they're just -- they're
5 just in the alcove. They're there.

6 MR. MEGINNISS: Okay.

7 (Discussion held off the record.)

8 MR. MEGINNISS: Okay. Ms. Baker?

9 MS. BAKER: Thank you, Election
10 Committee. Elizabeth Baker, I'm here as a volunteer
11 representing the Stand Together slate. With respect
12 to the protest that we've received copies of from
13 members of a Better Union, and as further articulated
14 by Mr. Guzman and the two other representatives for
15 MBU who are here today, we don't believe that MBU has
16 articulated a single valid protest to the election.

17 With respect to specifically the
18 alleged instances of interference with their
19 collection of nominating petitions, I would point out
20 that, as the Election Committee has already found,
21 they submitted a sufficient number of signatures --
22 valid signatures on their nominating petitions and
23 they appeared on the ballot. To the extent that
24 there's been a vague allegation or inference -- or
25 they ask that the Committee draw an inference that

1 this alleged unsubstantiated interference with the
2 dominating petitions cast some other pall on their
3 campaign or had a negative impact, I don't believe
4 they've introduced evidence of a single credible
5 instance of violation.

6 I point out that members of a Better
7 Union and Mr. Guzman are experienced litigants. These
8 are the types of allegations they've raised repeatedly
9 in prior elections and they understand the obligation
10 and they've clearly had many months to get specific
11 information regarding the names of the -- of the
12 individuals involved, whether the witnesses or the
13 alleged actors who violated the law. In some cases,
14 they haven't even alleged a specific address that was
15 impacted. And members of their own slate who are
16 alleged witnesses, including Mr. McCarthy, regarding
17 2 5th Avenue, have not even appeared today in support
18 of the allegation so I think a negative inference has
19 to be drawn.

20 The only -- the only possible instance,
21 again unsubstantiated, where they've alleged a
22 specific witness and a conduct that would constitute a
23 violation, the conduct that they allege regarding 225
24 Liberty, where they're essentially alleging that there
25 was disparate access between what their supporters

1 were allowed to do at the worksite and what Stand
2 Together supporters were allowed to do. First of all,
3 they have not brought Mr. Collado -- Giovanni Collado
4 who was identified, to testify. They have not named
5 any of the parties who they allege, you know, caused
6 the disparate impact or proven that it happened.

7 But even if it were to happen, even if
8 every single unsubstantiated piece of hearsay was
9 credited, this single instance and this worksite could
10 not have impacted the outcome of the election. First
11 of all, they were nominated and appeared on the
12 ballot. And second of all, the -- the margin between
13 the votes that MBU received and the margin that Stand
14 Together received is the thousands. One single
15 worksite, even if everything that they allege could be
16 credited, could not have impacted this election.

17 Further, while we -- I understand that
18 Ms. Brion has described a specific instance that
19 occurred outside the Port Authority bus terminal.
20 Nothing that she alleges would constitute misconduct
21 or a violation, let alone a violation that would
22 affect the outcome of the election. She has not
23 indicated that anyone interfered with her collecting
24 petitions other than what's permissible conduct --
25 speech conduct by Union members where they advise one

1 another, "I don't support this -- this slate, don't
2 sign their petitions." Members are allowed to speak
3 to each other about their views. There's no
4 allegation, again, of misconduct that could be acted
5 upon, let alone misconduct that could impact the
6 outcome of the election.

7 With respect to the alleged discrepancy
8 between the LM-2 member number for 2023 and the number
9 of ballots mailed, not only is the testimony of the --
10 of the Union's chief of operations credible, but the
11 standards of -- the standards that she articulated are
12 completely consistent with applicable law and
13 regulation. As she explained, the LM-2 number
14 reflects -- the member number reflects the numbers of
15 actual payments received in the month of December. It
16 doesn't reflect -- it is not the number of members who
17 were eligible to vote in -- would've been eligible to
18 vote in December, let alone the number of members who
19 were eligible to vote during the eligibility period
20 for this election, so we believe that those
21 allegations must be dismissed.

22 With respect to the other protests
23 regarding non-compliance with the Constitution in
24 various ways, I believe Mr. Guzman's reading regarding
25 the district executive board issue is a tortured

1 reading of the Constitution and is also not consistent
2 with the petition. Petitions where executive board
3 members are referenced distinguish between Union wide
4 at-large executive board members and then on each
5 petition there's a breakout of the district. It says
6 "District" at the -- as a subheading and then
7 "Executive Board Member" underneath so it's very clear
8 that it's the district executive board member as
9 opposed to the at-large executive board member.

10 I do not believe that MBU has
11 articulated any other grounds for relief or further
12 investigation by the Committee. If there's anything
13 that you -- specific that I haven't addressed that you
14 would like Stand Together to address, please let me
15 know.

16 MR. MEGINNISS: -- something and you
17 may need time to do this.

18 MS. BAKER: Sure.

19 MR. GUZMAN: I'd like to respond.

20 MR. MEGINNISS: Hang on one second.
21 You'll get a chance.

22 I think that to the extent that you
23 have this information, we would like to know about the
24 distribution of checks to shop stewards, what occurred
25 during that. There's an allegation that -- not simply

1 that checks were given to shop stewards, but that when
2 that was done there was a direction to take a list and
3 go get members from buildings. And we would like to
4 know -- we'd like to get to the bottom of whether that
5 occurred.

6 You have from Mr. Guzman that he heard
7 from two unnamed shop stewards that, that occurred.
8 Obviously, that's not a smoking gun or whatever it
9 was, but we want to know about it because it's a
10 concern.

11 MS. BAKER: Okay. So the checks were
12 distributed and lists of -- which list?

13 MR. MEGINNISS: The allegation was that
14 when the shop steward checks were distributed in May
15 or June of this year, at that time the shop stewards
16 were simultaneously given -- the allegation, given
17 copies of lists of members in buildings to go get
18 signatures from, and we have some concern about that.

19 MS. BAKER: So I will need a break.

20 MR. MEGINNISS: Of course. Before you
21 go, Mr. Guzman has something.

22 MR. GUZMAN: Yes. I think I here to
23 present proof or evidence of what happened. I don't
24 here to give an opinion. I think she's giving
25 opinion. She's not presenting any evidence.

1 MR. MEGINNISS: I think she's giving
2 arguments.

3 MR. GUZMAN: It's -- it's an opinion.

4 MR. MEGINNISS: Well, it's --

5 MR. GUZMAN: If you have your opinion,
6 I have -- I think you have to present it with some
7 evidence.

8 MR. MEGINNISS: I appreciate that. I
9 think --

10 MR. GUZMAN: No. The thing is --
11 one -- one thing is the Committee Election is hearing
12 opinion. I trying to present it here. But what she
13 do is give an opinion. And whether it's going to
14 affect that, you are not asking questions.

15 MR. MEGINNISS: There's nothing --

16 MR. GUZMAN: Why you are not presenting
17 evidence in the opinion that you are giving?

18 MR. MEGINNISS: There's nothing that
19 precludes them or you giving your opinions, giving
20 your arguments about what the evidence means or
21 doesn't mean. And so if you have something you want
22 to argue, you have the right to argue.

23 MR. GUZMAN: Yes. I think that the
24 letter that you sended for this meeting that say about
25 present the evidence --

1 MR. MEGINNISS: It also said something
2 about arguments, too; didn't it?

3 MR. GUZMAN: I just hear opinions in
4 there.

5 MR. MEGINNISS: I think it -- didn't it
6 say something about arguments?

7 MR. GUZMAN: Opinions. That's -- she's
8 giving an opinion of what I said.

9 MR. MEGINNISS: I think what she's
10 doing is giving an argument. And what --

11 MR. GUZMAN: I don't think she's giving
12 an argument, that's giving an opinion.

13 MS. BAKER: Just to be clear, since
14 there's a lot of debate about what I said --

15 MR. GUZMAN: -- an opinion and
16 decision.

17 MS. BAKER: So excuse me. Since
18 there's a lot of back and forth about what I said,
19 I'll just be very clear.

20 Mr. Guzman, I don't believe you've
21 alleged a single credible fact that Stand Together can
22 or has an obligation to respond to. So I've -- that
23 is my statement on the record. It may be an opinion,
24 but that's an explanation.

25 MR. GUZMAN: That's an opinion --

1 MS. BAKER: So Mr. Meginniss, if you're
2 asking me --

3 MR. GUZMAN: -- this number, just show
4 me something else.

5 MS. BAKER: Mr. Meginniss --

6 MR. GUZMAN: -- an opinion. This is a
7 number from the --

8 MR. MEGINNISS: This is what we don't
9 want. This is what we don't want.

10 MR. GUZMAN: -- presenting an opinion,
11 say something different. I mean, no --

12 MR. MEGINNISS: Your point is made.
13 The Election Committee has heard it.

14 And your point is made, Ms. Baker. But
15 we would very much like to hear about the distribution
16 of checks to shop stewards, if that's possible.

17 MS. BAKER: Sure. So --

18 MR. MEGINNISS: We should take a break
19 because --

20 MS. BAKER: Yes. And I don't know how
21 much time I would need. I would need, I would
22 imagine, at least 30 minutes to 60 minutes. I'll have
23 to --

24 MR. MEGINNISS: So why don't we grab
25 some lunch and take a break, and please let us know if

1 it's going to be more than an hour.

2 MS. BAKER: Sure.

3 MR. MEGINNISS: Which you'll text
4 somebody to tell us; okay?

5 MS. BAKER: Sure.

6 MR. GUZMAN: What about the -- the
7 numbers of the member who took -- they asking the
8 members from the airport. What's the number? You
9 going to get those numbers today?

10 MR. MEGINNISS: I don't know. I don't
11 think so.

12 MR. GUZMAN: Okay.

13 MS. BRION: I mean, I -- I understand
14 what she's saying and -- and she mention that this is
15 something that -- over and over, but it's being done
16 over and over --

17 THE REPORTER: I'm sorry. I'm sorry.
18 Can you -- I'm going to lose what you're saying right
19 now. If you'd could speak up. I'm sorry.

20 MS. BRION: Sorry. I -- I understand
21 what she's saying. But if you find the Constitution
22 from his part to be a torturous because has nothing
23 being corrected. So now I'm giving you a list of some
24 members. It's not much, but if that happened in one
25 building, how many other buildings we had members that

1 they didn't receive the vote? I think it's the right
2 as American citizen to vote and that's their
3 Constitution.

4 MR. MEGINNISS: No, Ms. Brion --

5 MS. BRION: I don't know if I'm wrong,
6 but I feel in that way.

7 MR. MEGINNISS: And I'm glad you said
8 that because that is what we call argument and you're
9 allowed to make the argument and we hear you; okay?

10 MS. BRION: Okay.

11 MR. MEGINNISS: So why don't we take a
12 break. We're going to have some lunch. And please
13 don't go too far. I hope you'll come back soon.

14 MR. GUZMAN: What -- what else we going
15 to talk about?

16 MR. MEGINNISS: I want to hear from her
17 and I assume you're going to want to hear from her,
18 too.

19 MR. GUZMAN: Yeah. I'm little tired.

20 MR. MEGINNISS: I am, too.

21 MR. GUZMAN: But I -- I work at
22 nighttime, you work at daytime. I went to sleep at
23 almost three o'clock and had to wake at 7:40 to come
24 in here at ten o'clock, you know. So you -- you
25 working daytime and you go to sleep at --

1 MR. MEGINNISS: But not like you.

2 MR. GUZMAN: You going to sleep at
3 eleven o'clock maybe, you know. So it's two different
4 things.

5 MS. BRION: We take 20 minutes?

6 MR. MEGINNISS: Well, she's going to do
7 the best she can to come back and she's going to let
8 us know as soon as she can come.

9 MR. GUZMAN: Yes.

10 MR. MEGINNISS: You know, the
11 Committee --

12 MR. GUZMAN: I might fall asleep soon.

13 MR. MEGINNISS: Yeah.

14 MS. BRION: So do -- can I go outside?

15 MR. MEGINNISS: Let's go off the
16 record, please. Thank you.

17 THE REPORTER: Yeah.

18 It's 12:49 p.m. Off the record.

19 (Off the record.)

20 THE REPORTER: Do we have the witness
21 name?

22 MR. MEGINNISS: John Santos. J-O-H-N,
23 S-A-N-T-O-S.

24 THE REPORTER: Thank you, Counsel.

25 MR. MEGINNISS: And John, can you just

1 tell us what office you hold with the Union?

2 MR. SANTOS: I hold the office of
3 secretary/treasurer, Local 32BJ.

4 MR. MEGINNISS: And so something has
5 come up in our hearings this morning, an issue that we
6 hadn't anticipated that we had -- the Committee has
7 questions about and they wanted to ask you those
8 questions.

9 MR. SANTOS: Sure.

10 MR. MEGINNISS: There was an allegation
11 that the Union distributed checks to shop stewards in
12 May or June of this year and when they did so they
13 gave -- some unnamed person from the Union gave shop
14 stewards Union lists of members and told the shop
15 stewards to go get those people to sign petitions. So
16 the questions we have for you -- I'm going to just
17 break this down -- did the Union distribute checks to
18 shop stewards in May or June of this year?

19 MR. SANTOS: Yes. Probably though in
20 April or May.

21 MR. MEGINNISS: In April or May?

22 MR. SANTOS: Yes.

23 MR. MEGINNISS: And was that an unusual
24 occurrence?

25 MR. SANTOS: No.

1 MR. MEGINNISS: Does that happen all
2 the time?

3 MR. SANTOS: It's every year. Yearly.

4 MR. MEGINNISS: There's a --

5 MR. SANTOS: Annually.

6 MR. MEGINNISS: And what is the nature
7 of the check?

8 MR. SANTOS: It's a -- it's a steward
9 rebate -- a dues rebate for the stewards and that's
10 for the work that they do throughout the year.

11 MR. MEGINNISS: Okay.

12 MR. SANTOS: They get it for the
13 previous year.

14 MR. MEGINNISS: I see. And the rebate
15 is calculated pursuant to a formula of some kind?

16 MR. SANTOS: Yeah. It's -- it's the
17 reimbursement of their dues minus the per capita.

18 MR. MEGINNISS: For a year?

19 MR. SANTOS: Per year.

20 MR. MEGINNISS: I see.

21 MR. SANTOS: Monthly. Monthly for the
22 year, yeah.

23 MR. MEGINNISS: Now, in connection with
24 the distribution of checks this year, the rebates,
25 were instructions given related to signing petitions?

1 MR. SANTOS: No.

2 MR. MEGINNISS: And were lists given to
3 stewards with respect to individuals to contact with
4 respect to signing petitions?

5 MR. SANTOS: No.

6 MR. MEGINNISS: And how do you know
7 that?

8 MR. SANTOS: Because actually we -- we
9 distributed the checks prior to the petition period.
10 You know, the petition period was in June, we stopped
11 the distribution of the checks probably sometime in
12 May.

13 MR. MEGINNISS: Okay. Is there
14 anything more to this allegation that we should know?

15 MR. SANTOS: It's just an allegation.

16 MR. MEGINNISS: Is there -- am I
17 missing any questions? Is there another question I
18 should be asking you to unearth information that would
19 be relevant?

20 MR. SANTOS: No. I mean, this is
21 something that the Union does every year to -- you
22 know, we distribute checks every year, more or less
23 the same time every year, to the stewards.

24 MR. MEGINNISS: Irrespective of whether
25 there's a Union campaign going?

1 MR. GUZMAN: Every year, yeah.

2 MR. MEGINNISS: Ms. Baker, you have --

3 MS. BAKER: I just had one follow-up
4 question.

5 MR. MEGINNISS: Yeah.

6 MS. BAKER: So Mr. Santos, are -- are
7 staff given any instructions with respect to whether
8 they should be engaging in any campaign activity or
9 not in the course of their duties on work time,
10 including the distribution of the checks?

11 MR. SANTOS: We give instructions all
12 the time, especially right -- right before the
13 election. You know, the dos and don'ts of what not to
14 do.

15 MS. BAKER: And what are they told not
16 to do, you know, regarding a process like this with
17 distributing checks?

18 MR. SANTOS: Yeah. I mean, we would
19 never give -- you know, the distribution of checks is
20 separate. It's a Union function. It's something that
21 happens yearly, annually, and -- and to keep
22 everything to do for the Union separate from the
23 election. It's a clear point, precise.

24 MS. BAKER: So there's no campaigning
25 in connection with the distribution of checks or

1 distribution of lists?

2 MR. SANTOS: No campaigning. No. And
3 again, it's -- it wasn't even done during the period
4 of the petition period, you know.

5 MR. MEGINNISS: The distribution of the
6 checks?

7 MR. SANTOS: The distribution of
8 checks. And you know, just information, there was
9 still a number of checks that weren't distributed that
10 will be distributed starting back in October just to
11 stay clear away from -- from the election.

12 MR. MEGINNISS: Okay. I need to
13 understand that. So some checks were distributed in
14 April or May and then some weren't distributed?

15 MR. SANTOS: Right. If we couldn't get
16 ahold of the steward or didn't get to see them in
17 time, then all the checks were returned back to the
18 Union, to the accounting department, until the month
19 of October, and they'll be released again to be
20 distributed.

21 MR. MEGINNISS: And the reason they
22 were held for that time?

23 MR. SANTOS: Just to make sure nothing
24 is in conjunction with the election.

25 MR. MEGINNISS: I see. Okay.

1 Anything else, members of the
2 Committee?

3 Thank you, Mr. Santos. Anything else
4 you want to tell us?

5 MR. SANTOS: Thank you for the work
6 that you guys are doing. Appreciate it. Very
7 important.

8 MS. BAKER: Thank you.

9 MR. SANTOS: Thank you.

10 MR. MEGINNISS: Nothing else, John.
11 Thank you.

12 MR. SANTOS: Thank you. Thank you.

13 MR. MEGINNISS: Elizabeth, we're not --

14 MS. BAKER: Okay.

15 MR. MEGINNISS: We are reaching out to
16 the AAA to try to get information about whether they
17 ever got a request for a duplicate ballot from the
18 handful of people that were named by Ms. Brion.

19 And Leslie, do we anticipate a call
20 back?

21 UNIDENTIFIED SPEAKER: We do. He said
22 he was going to go check on it right away.

23 MR. MEGINNISS: All right.

24 So Mr. Bekman, we just need to break
25 again. We hope to be resuming in just a few minutes.

1 THE REPORTER: All right.

2 It's 1:35 p.m. Off the record.

3 (Off the record.)

4 THE REPORTER: The time's 2:13 p.m. On
5 the record.

6 (Discussion held off the record.)

7 MR. MEGINNISS: Sorry. We may need
8 three minutes more.

9 THE REPORTER: Understood, Counsel.
10 It's 2:15 p.m. Off the record.

11 (Off the record.)

12 THE REPORTER: Time is 2:30 p.m. On
13 the record.

14 MR. MEGINNISS: Mr. Kawahara, could you
15 spell your name for the court reporter?

16 MR. KAWAHARA: Absolutely.
17 H-I-R-O-Y-U-K-I, last name K-A-W-A-H-A-R-A.

18 MR. MEGINNISS: Okay. And for the
19 record, Mr. Kawahara, what is your employment
20 position?

21 MR. KAWAHARA: I am the --

22 MR. MEGINNISS: Where do you work?

23 MR. KAWAHARA: Sure. I'm the assistant
24 vice president of elections for the American
25 Arbitration Association.

1 MR. MEGINNISS: And were you
2 involved --

3 THE REPORTER: I'm sorry, Counsel, it
4 broke up on my end. If he
5 could just repeat.

6 MR. MEGINNISS: Repeat, please.

7 MR. KAWAHARA: Yeah. I am the
8 assistant vice president of elections for the American
9 Arbitration Association.

10 MR. MEGINNISS: And did you have
11 responsibility for handling the Local 32BJ election of
12 officers in 2024?

13 MR. KAWAHARA: I did.

14 MR. MEGINNISS: In the course of that,
15 was the AAA responsible for mailing out ballots to
16 voters in that election?

17 MR. KAWAHARA: Yes, we were.

18 MR. MEGINNISS: And did the AAA have a
19 system for handling requests from individuals who at
20 least asserted that they had not received their ballot
21 in the mail?

22 MR. KAWAHARA: We did. We would keep a
23 log of -- of each of those requests received that
24 would detail the voter's name, their district, so that
25 would reflect the -- the ballot type that they would

1 receive, their contact information, including their
2 mailing address and telephone number, and then also
3 the date that the request was received and the date
4 that the request was fulfilled, meaning the -- the
5 date that the duplicate ballot was mailed out.

6 MR. MEGINNISS: And in connection with
7 that log, how did the AAA receive those requests?

8 MR. KAWAHARA: We received those
9 requests two ways, via our 800 number for our
10 elections help desk and also via e-mail.

11 MR. MEGINNISS: And when a request was
12 received, what action would the AAA take with respect
13 to that request?

14 MR. KAWAHARA: So we would record the
15 information that I described. If the voter appeared
16 on the list, the voter list that was initially
17 provided to us, we would also record the control
18 number for that voter in -- in mailing out a
19 duplicate. Otherwise, if the voter did not appear on
20 the voter list, we would still mail out a duplicate
21 and just indicate on the log that they were not on the
22 list.

23 MR. MEGINNISS: Were there ever
24 instances where individuals requested a ballot from
25 you in the manner that you've described where the AAA

1 did not send out a ballot?

2 MR. KAWAHARA: No.

3 MR. MEGINNISS: So in each and every
4 instance, you honored the request and sent out a
5 replacement ballot?

6 MR. KAWAHARA: Correct. So it's --
7 it's our general practice, just to avoid potentially
8 disenfranchising any voter, if someone is maybe
9 inadvertently left off the voter list or did not
10 appear on the list that -- that was provided to us for
11 any reason, we do mail out to anyone who requests a --
12 a duplicate ballot.

13 MR. MEGINNISS: We are conducting a
14 hearing today on allegations that the election of
15 officers was not conducted as it should have been, and
16 one of the allegations that we heard today was that
17 three individuals requested replacement ballots and
18 did not receive replacement ballots from the AAA in
19 the mail, and I'd like to review with you those
20 allegations. I am aware that Ms. Hamelius had called
21 you before to ask you to look at the log with respect
22 to the names of these individuals; is that right?

23 MR. KAWAHARA: Correct.

24 MR. MEGINNISS: And I just want to
25 state on the record the names that we, having heard

1 them for the first time today, understand to be the
2 people who purportedly requested these replacement
3 ballots from the AAA. One of them is Maria Javier,
4 J-A-V-I-E-R. Did you look at the log of requests to
5 see if someone named Maria Javier had called to
6 request a replacement ballot?

7 MR. KAWAHARA: We did. We did review
8 all the phone logs and did not receive a -- a
9 duplicate request from Maria, either via e-mail or
10 through the telephone.

11 MR. MEGINNISS: And with respect to
12 another person named Marcia, M-A-R-C-I-A, Garcia,
13 G-A-R-C-I-A, did you review the logs to see if you had
14 gotten a request from that person?

15 MR. KAWAHARA: We did and we did not
16 receive a request from Marcia.

17 MR. MEGINNISS: And a third person who
18 was identified to us as Mike, or Michael, Ewell,
19 E-W-E-L-L, did you review the logs to see if you
20 received something from that person?

21 MR. KAWAHARA: We did and we did not
22 receive a request from Mr. Ewell.

23 MS. BRION: -- didn't have last name.

24 MR. MEGINNISS: Yes. Doing it right
25 now.

1 MS. BRION: Okay.

2 MR. MEGINNISS: Okay. Finally, there
3 was one person who was identified only as Manny,
4 M-A-N-N-Y, and I believe Ms. Hamelius asked you to
5 review the logs to see if there was anyone in your
6 logs whose name might have corresponded to somebody
7 named Manny; did you do that search?

8 MR. KAWAHARA: We did. We did retrieve
9 one record from a Manuel Pallazitco,
10 P-A-L-L-A-Z-I-T-C-O.

11 MR. MEGINNISS: And did you send that
12 person a replacement ballot?

13 MR. KAWAHARA: We did. That ballot was
14 mailed on September 9th, the same day that it was
15 received.

16 MR. MEGINNISS: So it was -- the
17 request was made the 9th and the mailing was made the
18 9th?

19 MR. KAWAHARA: Correct.

20 MR. MEGINNISS: And when you send out
21 those replacement ballots, do you send them by regular
22 mail?

23 MR. KAWAHARA: Yes. They're sent
24 First-Class Mail.

25 MR. MEGINNISS: Okay. In the course of

1 the conduct of the election, the election coordinator,
2 Ms. Hamelius, at one point received a complaint that
3 the telephone number for the ballot replacement
4 hotline that AAA uses was not working, and I believe
5 she called you to determine whether indeed it was
6 working; do you recall that?

7 MR. KAWAHARA: I do.

8 MR. MEGINNISS: And did you check to
9 see whether the line was working?

10 MR. KAWAHARA: We did. We did verify
11 that the line was operational and also conferred with
12 our I.S. department just to ensure that there were no
13 interruptions to service, which they confirmed there
14 were none.

15 MR. MEGINNISS: And there had not been
16 any during the course of the election?

17 MR. KAWAHARA: Correct.

18 MR. MEGINNISS: Okay.

19 (Discussion held off the record.)

20 MR. MEGINNISS: To your knowledge, did
21 you ever receive a request from anyone in the 32BJ
22 election that ballots be sent by FedEx or by overnight
23 mail?

24 MR. KAWAHARA: No, not to my knowledge.

25 MR. MEGINNISS: Okay. I don't have

1 anything else.

2 Anybody else? Anybody else?

3 Thank you, Mr. Kawahara. It's not My
4 Cousin Vinny, but your testimony was very good.
5 Appreciate it.

6 MR. KAWAHARA: Thank you, everyone.

7 MR. MEGINNISS: Very helpful.

8 MR. KAWAHARA: Bye-bye.

9 MR. MEGINNISS: Take care.

10 (Discussion held off the record.)

11 MR. MEGINNISS: I'm actually going to
12 ask Ms. Hamelius to do some very quick testimony.

13 And Mr. Bekman, this is Metzli
14 Hamelius. You have that spelling?

15 THE REPORTER: I do. Thank you.

16 MR. MEGINNISS: Ms. Hamelius, you were
17 the election coordinator for the election this year?

18 MS. HAMELIUS: Yes.

19 MR. MEGINNISS: And did you become
20 familiar with the availability of the AAA replacement
21 ballot request line when you were doing that work?

22 MS. HAMELIUS: Yes.

23 MR. MEGINNISS: When did you first
24 become aware of it?

25 MS. HAMELIUS: I think it first came up

1 sometime in May when we were talking about a postcard
2 that goes out to members providing them with that
3 information.

4 MR. MEGINNISS: Did it -- was there a
5 time when there was a candidates' meeting here in New
6 York in August; do you recall that? Were you present
7 there?

8 MS. HAMELIUS: I was present.

9 MR. MEGINNISS: And was Mr. Guzman
10 present?

11 MS. HAMELIUS: He was.

12 MR. MEGINNISS: And in the course of
13 that meeting, was reference made to the replacement
14 ballot line at the AAA?

15 MS. HAMELIUS: Reference was made, the
16 number was provided, and people attending that meeting
17 were informed that the number would be available on
18 the website as well.

19 MR. MEGINNISS: On the website of the
20 Union?

21 MS. HAMELIUS: Yes.

22 MR. MEGINNISS: And was the number put
23 on the website of the Union?

24 MS. HAMELIUS: Yes.

25 MR. MEGINNISS: Now, you had occasion

1 to meet with Mr. Guzman and Alexandra Brion at a time
2 when they inspected the mailing list of the Union; is
3 that right?

4 MS. HAMELIUS: Yes.

5 MR. MEGINNISS: At that time, did
6 either of them question you about the availability of
7 the number at AAA in terms to request replacement
8 ballots?

9 MS. HAMELIUS: They did not ask me for
10 the number. But when there was -- when -- when
11 Ms. Alexandra had vocalized concern about coworkers
12 who had not received ballots, I made sure to provide
13 them with the number, show them where the website was
14 that showed the number also.

15 MR. MEGINNISS: And do you recall the
16 date of that meeting?

17 MS. HAMELIUS: Yes. That meeting was
18 on September 9th.

19 MR. MEGINNISS: That's fine. Thank
20 you. Appreciate it. Oh, I'm sorry, one more. I'm
21 sorry. In the course of this election, are you aware
22 that the Union sent out a postcard to people regarding
23 how they could request a replacement ballot?

24 MS. HAMELIUS: Yes.

25 MR. MEGINNISS: And do you know who

1 that was sent to?

2 MS. HAMELIUS: My understanding is
3 that, that postcard was sent to the same individuals
4 who were on the list that went to AAA for people who
5 were in good standing and could vote.

6 MR. MEGINNISS: Okay. And did that
7 postcard include the telephone number at AAA that
8 people could contact if they wanted a replacement
9 ballot?

10 MS. HAMELIUS: Yes.

11 MR. MEGINNISS: Okay. That's fine.
12 Thank you.

13 I think we're done for the day.
14 Unless Ms. Baker, you have something
15 else?

16 MS. BAKER: No. Thank you.

17 MR. MEGINNISS: Thank you, Mr. Bekman.
18 Thank you, Ms. Ortega.

19 And Mr. Bekman, we do want this as fast
20 as we can get it.

21 THE REPORTER: Understood. Yes.
22 Veritext is going to get back to me with the exact
23 delivery time of how fast they can get it to you.

24 MR. MEGINNISS: Thank you very much.

25 THE REPORTER: Yes. Thank you.

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Time is 2:43 p.m. Off the record.
(Whereupon, at 2:43 p.m., the
proceeding was concluded.)

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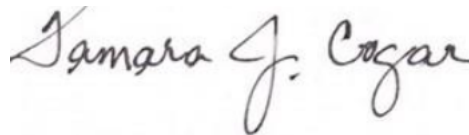


JAMES BEKMAN
Notary Public in and for the
State of New York

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