

INDEPENDENT DISCIPLINARY OFFICERS

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Independent Review Officer
Hon. Barbara S. Jones (Ret.)

Independent Investigations Officer
Robert D. Luskin, Esq.

July 28, 2021

Via Certified Mail, First Class Mail & Electronic Mail

Todd Mendez
9950 Conejo Road
Santee, California 92071-1524
tcmendez72@gmail.com

Re: Independent Review Officer's Hearing on
Charges against Local 683 Member Todd Mendez dated August 28, 2020

Dear Mr. Mendez:

Enclosed please find a Notice of Hearing for the above-referenced charges against you. The *de novo* hearing, under Paragraph 34 of the Final Order, in this matter before the Independent Review Officer is scheduled for September 20, 2021 and September 21, 2021 at 10:00 a.m. The hearing will be held at the Balboa Meeting Room in the Grand Hyatt Hotel located at One Market Place, San Diego, California 92101. A copy of the Hearing Rules are also enclosed herein. Participants at the hearing are expected to comply with local safety protocols related to the Covid-19 pandemic.

At the hearing, you may present any evidence relevant to the charges against you. You have been previously provided the Charges contained in the Investigative Report. However, a copy of the August 28, 2020 Investigative Report and associated Exhibits are enclosed herein. In addition, enclosed are copies of the transcript of the proceedings from the IBT Panel Hearing dated January 20, 2021 and the Exhibits related to that proceeding, including the post hearing submissions submitted by you and the IBT.

Also enclosed are copies of the IBT Panel's Report and Recommendations dated March 18, 2021 and the IRO's subsequent determinations regarding the Panel's Report and Recommendations. As noted in the IRO's letter dated May 18, 2021, the only charges to be considered at the *de novo* hearing are as follows:

Charge 1

1. Allegations pertaining to the disbursement of the anniversary bonus to Mr. Mendez as described in Charge 1 of the Charge Report.
2. Allegations pertaining to the disbursement of the vacation payments to Mr. Mendez and others as described in Charge 1 of the Charge Report. This includes anniversary bonuses paid to Patricia Henry that were booked as vacation payments.
3. Allegations described in Charge 1 of the Charge Report that Mr. Mendez breached his fiduciary duties by failing to ensure that members' dues payments were posted to TITAN.

Charge 2

The IRO determined that the Panel's findings with respect to Charge 2 were inadequate. As such, the IRO will hear evidence pertaining to Charge 2 in its entirety.

Charge 3

The only remaining allegations with respect to Charge 3 are the threats made against Robert Browning. Accordingly, I will only hear evidence with respect to the allegations described in Charge 3 that Mr. Mendez brought reproach upon the union and violated his oath by threatening, and threatening to retaliate against, Mr. Browning.

Very truly yours,

/s/ Barbara S. Jones

Hon. Barbara S. Jones (Ret.)
Independent Review Officer

Enclosures

cc: Bradley Raymond, Esq. (via email w/o Enclosures)
Robert D. Luskin, Esq. (via email w/o Enclosures)
David Kluck, Esq. (via email w/o Enclosures)
Daniel Healy, Esq. (via email w/o Enclosures)