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<p>1 IN THE FIRST JUDICIAL DISTRICT COURT</p> <p>2 OF THE STATE OF NEVADA,</p> <p>3 IN AND FOR THE COUNTY OF STOREY, NEVADA</p> <p>4 -oOo-</p> <p>5</p> <p>6 MELANIE KEENER, :</p> <p>7 Plaintiff, : :</p> <p>8 vs. : Case No.</p> <p>9 : 17 TRT 00001 1E</p> <p>10 GERALD R. ANTINORO, an individual;:</p> <p>11 STOREY COUNTY, a political : :</p> <p>12 subdivision of the State of : :</p> <p>13 Nevada; et al., : :</p> <p>14 Defendants. : :</p> <p>15 =====</p> <p>16</p> <p>17 DEPOSITION OF ANTHONY DOSEN</p> <p>18 Wednesday, February 14, 2018</p> <p>19 Reno, Nevada</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25 REPORTED BY: SUSAN E. BELINGHERI, CCR #655</p>	<p>1 I N D E X</p> <p>2</p> <p>3 EXAMINATION: PAGE</p> <p>4 By Mr. Flangas 4</p> <p>5</p> <p>6</p> <p>7 EXHIBITS: DESCRIPTION: PAGE</p> <p>8 Exhibit 1 Storey County Administrative Policies and Procedures..... 31</p> <p>9 Exhibit 2 Typewritten statement by Melanie Keener..... 60</p> <p>10 Exhibit 3 Screenshots of 11/12/13 text messages..... 83</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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<p>1 APPEARANCES:</p> <p>2</p> <p>3</p> <p>4 For the Plaintiff:</p> <p>5 FLANGAS DALACAS LAW GROUP</p> <p>6 Attorneys at Law</p> <p>7 By: GUS W. FLANGAS, ESQ.</p> <p>8 3275 South Jones Boulevard, Suite 105</p> <p>9 Las Vegas, Nevada 89146</p> <p>10</p> <p>11 For the Defendant:</p> <p>12 RANDS, SOUTH & GARDNER</p> <p>13 Attorneys at Law</p> <p>14 By: DOUGLAS RANDS, ESQ.</p> <p>15 9498 Double R Boulevard, #A</p> <p>16 Reno, Nevada 89521</p> <p>17</p> <p>18 Also Present:</p> <p>19 MELANIE KEENER</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 PURSUANT TO NOTICE, and on Wednesday, the</p> <p>2 14th day of February, 2018, at the hour of 1:00 p.m. of</p> <p>3 said day, at the offices of Bonanza Reporting &</p> <p>4 Videoconference Center, 1111 Forest Street, Reno,</p> <p>5 Nevada, before me, Susan E. Belingheri, a notary public,</p> <p>6 personally appeared ANTHONY DOSEN.</p> <p>7 -oOo-</p> <p>8</p> <p>9 ANTHONY DOSEN,</p> <p>10 having been duly sworn,</p> <p>11 was examined and testified as follows:</p> <p>12</p> <p>13 EXAMINATION</p> <p>14 BY MR. FLANGAS:</p> <p>15 Q. Good afternoon, Mr. Dosen.</p> <p>16 A. Good afternoon, sir.</p> <p>17 Q. Could you please state your name and spell it for</p> <p>18 the record, please.</p> <p>19 A. Anthony C. Dosen, D-o-s-e-n.</p> <p>20 Q. Mr. Dosen, you just took an oath; right?</p> <p>21 A. Yes, I did.</p> <p>22 Q. Do you understand that that oath has the same</p> <p>23 solemnity and ramifications as though you took it in a</p> <p>24 court of law?</p> <p>25 A. Yes, I do.</p>

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<p>1 Q. When I say "ramifications," what I mean is it has</p> <p>2 the same ramifications for perjury as though you took it</p> <p>3 in a court of law. Do you understand that?</p> <p>4 A. Yes, I do.</p> <p>5 Q. I'm going to direct your attention to the lady to</p> <p>6 your immediate left. She's the court reporter. She's</p> <p>7 taking down everything that's being said here today.</p> <p>8 And if you'll notice, she's doing that with her fingers.</p> <p>9 A. Okay.</p> <p>10 Q. And the reason I point that out is that she</p> <p>11 cannot record both of us speaking at the same time. Do</p> <p>12 you understand that?</p> <p>13 A. Yes, I do.</p> <p>14 MR. RANDS: Although, for the record, she's</p> <p>15 very good, so she probably could, but let's not make her</p> <p>16 test it.</p> <p>17 BY MR. FLANGAS:</p> <p>18 Q. So what that means for us is that you need to</p> <p>19 wait until I'm done with my question before you answer</p> <p>20 the question. Okay?</p> <p>21 A. Okay.</p> <p>22 Q. I'll try to do the same for you, I'll wait until</p> <p>23 you finish your answer before I start my question.</p> <p>24 Understand?</p> <p>25 A. Yes, I do.</p>	<p>1 pending, that you finish answering the question before</p> <p>2 we take a break.</p> <p>3 A. Yes, sir.</p> <p>4 Q. At the conclusion of this deposition, the court</p> <p>5 reporter is going to transcribe everything that's been</p> <p>6 said here today and put it in a booklet called a</p> <p>7 transcript. Do you understand that?</p> <p>8 A. Yes, sir.</p> <p>9 Q. You're going to be given an opportunity to review</p> <p>10 the transcript should you so desire. Do you understand</p> <p>11 that?</p> <p>12 A. Yes, sir.</p> <p>13 Q. It's not mandatory for you to review it, but</p> <p>14 you'll be given the opportunity. All right?</p> <p>15 A. Yes, sir.</p> <p>16 Q. You're also going to be given the opportunity to</p> <p>17 make changes to it if you want. Do you understand that?</p> <p>18 A. Yes, sir.</p> <p>19 Q. I need to caution you, however, that if you do</p> <p>20 make a change to that transcript of a substantive</p> <p>21 nature, I will be able to comment upon it at trial. Do</p> <p>22 you understand?</p> <p>23 A. Yes, sir.</p> <p>24 Q. And "trial," I also mean evidentiary hearings,</p> <p>25 arbitrations, or however -- whatever the case may be.</p>
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<p>1 Q. Today I'm not here to try to trick you with my</p> <p>2 questions; however, if you answer my question it will be</p> <p>3 assumed that you understood the question. All right?</p> <p>4 A. Yes.</p> <p>5 Q. If you don't understand the question, please tell</p> <p>6 me you don't understand it and I'll rephrase it, ask it</p> <p>7 again, break it down, do whatever it takes to facilitate</p> <p>8 your understanding. All right?</p> <p>9 A. Correct.</p> <p>10 Q. If the question calls for a yes or no answer, you</p> <p>11 need to audibilize it by saying "yes" or "no," because a</p> <p>12 nod of the head, a shake of the head, a "uh-huh" or an</p> <p>13 "uh-uh" will not come out on the transcript. Do you</p> <p>14 understand that?</p> <p>15 A. Yes, I do.</p> <p>16 Q. During the course of this deposition the attorney</p> <p>17 who's present here, who represents both Mr. Antinoro and</p> <p>18 the County, may interpose an objection here and there.</p> <p>19 Do you understand that?</p> <p>20 A. Yes, I do.</p> <p>21 Q. And even though he does the objection, you're</p> <p>22 still going to need to answer the question. Okay?</p> <p>23 A. Yes, sir.</p> <p>24 Q. If you need a break during this deposition, let</p> <p>25 me know. The only thing I ask, if there's a question</p>	<p>1 Do you understand that?</p> <p>2 A. Yes, sir.</p> <p>3 Q. What I mean by "comment" on it, it means I will</p> <p>4 be able to bring your credibility into question. Do you</p> <p>5 understand that?</p> <p>6 A. Yes, sir.</p> <p>7 Q. Should you testify differently at any trial,</p> <p>8 evidentiary hearing, or an arbitration than you do</p> <p>9 today, I will be able to comment upon that as well. Do</p> <p>10 you understand that?</p> <p>11 A. Yes, sir.</p> <p>12 Q. And again, what I mean by "comment," I'll be able</p> <p>13 to bring your credibility into question. Do you</p> <p>14 understand that?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Are you on any type of medication, drugs, or</p> <p>17 anything that would, that would interfere with your</p> <p>18 ability to understand my questions or answer them</p> <p>19 accurately?</p> <p>20 A. No, sir.</p> <p>21 Q. Have you ever been convicted of a felony?</p> <p>22 A. No, sir.</p> <p>23 Q. Have you ever been convicted of a misdemeanor</p> <p>24 that involved fraud, dishonesty, or theft?</p> <p>25 A. No, sir.</p>

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<p>1 Q. Have you ever been arrested?</p> <p>2 A. No, sir.</p> <p>3 Q. Where did you go to high school?</p> <p>4 A. Fergus Falls, Minnesota.</p> <p>5 Q. What year did you graduate?</p> <p>6 A. 1982.</p> <p>7 Q. Any post-high school education?</p> <p>8 A. Fifteen credit hours.</p> <p>9 Q. Where at?</p> <p>10 A. Fergus Falls Community College.</p> <p>11 Q. Is your high school called Fergus Falls as well?</p> <p>12 A. No. I believe it was called Roosevelt High</p> <p>13 School.</p> <p>14 Q. So you got 15 credit hours in what?</p> <p>15 A. General studies.</p> <p>16 Q. What year did you go to -- did you take these 15</p> <p>17 credits?</p> <p>18 A. 1982.</p> <p>19 Q. Any degree from those credits?</p> <p>20 A. No, sir.</p> <p>21 Q. Any certificate?</p> <p>22 A. POST certificates.</p> <p>23 Q. From those -- from that --</p> <p>24 A. Not from that.</p> <p>25 Q. -- Fergus Falls?</p>	<p>1 Q. So sheriff, chief deputy --</p> <p>2 A. Correct.</p> <p>3 Q. -- right?</p> <p>4 Then it goes to sergeants and then deputies;</p> <p>5 right?</p> <p>6 A. Yes.</p> <p>7 Q. And prior to Sheriff Antinoro, you had a rank of</p> <p>8 corporal; is that correct.</p> <p>9 A. No, sir.</p> <p>10 Q. There was never a rank of corporal prior to</p> <p>11 Sheriff Antinoro becoming sheriff?</p> <p>12 A. For myself?</p> <p>13 Q. No. In the rank structure. Was there --</p> <p>14 A. Oh, in the rank structure. Yes, there was.</p> <p>15 Q. Okay. So before it was roughly the same thing</p> <p>16 but there was a lieutenant rank; is that a correct</p> <p>17 statement?</p> <p>18 A. Correct.</p> <p>19 Q. And there was also a corporal rank; is that a</p> <p>20 correct statement?</p> <p>21 A. Correct.</p> <p>22 Q. And when Mr. Antinoro became sheriff, he got rid</p> <p>23 of those two ranks; right?</p> <p>24 A. Yes.</p> <p>25 Q. How long have you been the chief deputy?</p>
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<p>1 A. No, sir.</p> <p>2 Q. Okay. And POST certificate is Police Officer --</p> <p>3 A. Standardized Training.</p> <p>4 Q. Okay. So you got --</p> <p>5 A. Standards and Training.</p> <p>6 Q. So you got a POST certificate from where?</p> <p>7 A. State of Nevada.</p> <p>8 Q. What place? Where did you get your training to</p> <p>9 get your POST certificate?</p> <p>10 A. Nevada Highway Patrol.</p> <p>11 Q. What year?</p> <p>12 A. 1990.</p> <p>13 Q. What do you do for a living?</p> <p>14 A. Work for the Storey County Sheriff's Office.</p> <p>15 Q. What is your position with Storey County</p> <p>16 Sheriff's Office?</p> <p>17 A. Currently, chief deputy.</p> <p>18 Q. Does that make you the number two guy behind the</p> <p>19 sheriff?</p> <p>20 A. In the rank structure, yes.</p> <p>21 Q. And the sheriff is Gerald Antinoro?</p> <p>22 A. Yes.</p> <p>23 Q. How does the rank structure go, from sheriff on</p> <p>24 down?</p> <p>25 A. Sheriff, sergeants, deputies.</p>	<p>1 A. A year, two years. Year and a half.</p> <p>2 Q. When did you become the chief deputy?</p> <p>3 A. July of 2016.</p> <p>4 Q. Who was chief deputy before you?</p> <p>5 A. Chief Deputy Melanie Keener.</p> <p>6 Q. How long have you been with the Storey County</p> <p>7 Sheriff's Office?</p> <p>8 A. September 2005.</p> <p>9 Q. When you started in 2005, what did you start out</p> <p>10 as?</p> <p>11 A. Patrol officer, deputy.</p> <p>12 Q. How long were you a deputy?</p> <p>13 A. I believe until 2010.</p> <p>14 Q. And then you got promoted?</p> <p>15 A. Yes, sir.</p> <p>16 Q. What rank did you have then?</p> <p>17 A. Sergeant.</p> <p>18 Q. And then eventually you became the chief deputy;</p> <p>19 is that correct?</p> <p>20 A. That's correct.</p> <p>21 Q. I don't think I asked you what -- yeah, I did.</p> <p>22 You became the deputy in July of 2016? Chief deputy?</p> <p>23 A. Yes, sir.</p> <p>24 Q. Why did Ms. Keener -- why is Ms. Keener no longer</p> <p>25 with the police department? Or the sheriff's office, I</p>

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<p>1 should say, is the more accurate term.</p> <p>2 A. Why is she no longer there?</p> <p>3 Q. Yes.</p> <p>4 A. I believe due to an allegation, she left for a</p> <p>5 different position.</p> <p>6 Q. What allegation is that?</p> <p>7 A. An allegation of sexual mis -- or sexual</p> <p>8 harassment.</p> <p>9 Q. By who?</p> <p>10 A. Sheriff Antinoro.</p> <p>11 Q. How do you know this?</p> <p>12 A. I was advised of it.</p> <p>13 Q. By who?</p> <p>14 A. Everyone.</p> <p>15 Q. Well, give me some names. "Everyone" doesn't</p> <p>16 help much.</p> <p>17 A. HR, Austin Osborne, Pat Whitten, Sheriff Antinoro</p> <p>18 said he was mentioned.</p> <p>19 Q. Now, you mentioned HR told you?</p> <p>20 A. No. I heard it.</p> <p>21 Q. You heard it from HR?</p> <p>22 A. I heard people talking.</p> <p>23 Q. So you heard Austin Osborne talking about it?</p> <p>24 A. I've heard people talk about it.</p> <p>25 Q. Okay. Was Austin Osborne one of them?</p>	<p>1 Q. When were you told that you were going to be the</p> <p>2 chief deputy?</p> <p>3 A. I was in an acting capacity, and then I was</p> <p>4 informed, I believe, in July.</p> <p>5 Q. So when did you take over in the acting capacity</p> <p>6 as chief deputy?</p> <p>7 A. I cannot recall.</p> <p>8 Q. It was prior to July of 2016?</p> <p>9 A. I believe so.</p> <p>10 Q. And July of 2016 is when you became the actual</p> <p>11 chief deputy and were no longer the acting chief deputy?</p> <p>12 A. No.</p> <p>13 Q. That's not correct?</p> <p>14 A. No, that's not correct.</p> <p>15 Q. Okay. You told me you became the chief deputy in</p> <p>16 July of 2016.</p> <p>17 A. Okay. Let me clarify. I was the acting chief</p> <p>18 deputy.</p> <p>19 Q. Okay. So you were the acting chief deputy in</p> <p>20 July of 2016?</p> <p>21 A. Correct.</p> <p>22 Q. All right. And then when were you told that you</p> <p>23 were no longer going to be the acting chief deputy and</p> <p>24 become the actual chief deputy?</p> <p>25 A. July of 2017.</p>
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<p>1 A. I believe I heard, yes.</p> <p>2 Q. Pat Whitten was one of them?</p> <p>3 A. I believe I heard, yes.</p> <p>4 Q. Pat Whitten is the county manager?</p> <p>5 A. Yes.</p> <p>6 Q. Austin Osborne is your, I guess what you call</p> <p>7 your HR director?</p> <p>8 A. Yes.</p> <p>9 Q. When I say he's the HR director, he's the HR</p> <p>10 director for the entire county; right?</p> <p>11 A. Correct.</p> <p>12 Q. And you heard Mr. Antinoro?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. What did you hear them say?</p> <p>15 A. I just heard over-talking from up at the</p> <p>16 courthouse, and then I heard Sheriff Antinoro state that</p> <p>17 he had a complaint against him.</p> <p>18 Q. What else did you hear him say?</p> <p>19 A. Basically that was it.</p> <p>20 Q. Did you ask him more about it?</p> <p>21 A. No, I did not.</p> <p>22 Q. Why not?</p> <p>23 A. At that time it was not my business.</p> <p>24 Q. At that time what was your rank?</p> <p>25 A. Sergeant.</p>	<p>1 Q. A year later?</p> <p>2 A. Yes.</p> <p>3 Q. And here in these discussions, or whatever you</p> <p>4 want to -- however you want to characterize them, did</p> <p>5 you hear where Ms. Keener went to from the sheriff's</p> <p>6 office?</p> <p>7 A. I heard she took a position at the courthouse.</p> <p>8 Q. She took a position or was given the position?</p> <p>9 A. However you want to phrase it.</p> <p>10 Q. I'm asking what you -- how you would phrase it.</p> <p>11 A. She started working in that capacity at the</p> <p>12 courthouse.</p> <p>13 Q. So you don't know whether she was told to take</p> <p>14 that job or whether she applied for the job or anything</p> <p>15 like that?</p> <p>16 A. No, I do not.</p> <p>17 Q. What is Ms. Keener doing at the courthouse?</p> <p>18 A. She's director of courthouse security.</p> <p>19 Q. How do you know this?</p> <p>20 A. I've just been told.</p> <p>21 Q. From Sheriff Antinoro?</p> <p>22 A. From basically everybody in the county.</p> <p>23 Q. Including Sheriff Antinoro?</p> <p>24 A. Correct.</p> <p>25 Q. Where is her office located?</p>

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<p>1 A. In the courthouse somewhere.</p> <p>2 Q. Have you not seen it?</p> <p>3 A. I have not personally seen it. I believe it's in</p> <p>4 the old jail part.</p> <p>5 Q. Sheriff Antinoro tell you that?</p> <p>6 A. No.</p> <p>7 Q. Are you friends with Sheriff Antinoro?</p> <p>8 A. Yes, I am.</p> <p>9 Q. You probably one of his closest friends?</p> <p>10 A. Probably.</p> <p>11 Q. Best man at his wedding?</p> <p>12 A. Yes, I was.</p> <p>13 Q. When was this?</p> <p>14 A. To tell you the truth, I don't know the exact.</p> <p>15 Q. In the last year or two?</p> <p>16 A. In the last year.</p> <p>17 Q. Do you know John-Michael Mendoza?</p> <p>18 A. Yes, I do.</p> <p>19 Q. Who is he?</p> <p>20 A. A, a sergeant with the sheriff's office.</p> <p>21 Q. Is he friends with Mr. Antinoro?</p> <p>22 A. I believe so.</p> <p>23 Q. Close friend?</p> <p>24 A. I don't know.</p> <p>25 Q. He got invited to Mr. Antinoro's wedding;</p>	<p>1 Wendover?</p> <p>2 A. I heard the name. I had never met him.</p> <p>3 Q. And 2006 is when Mr. Antinoro started with the</p> <p>4 Storey County Sheriff's Office?</p> <p>5 A. Correct.</p> <p>6 Q. What did Sheriff Antinoro start off as?</p> <p>7 A. I believe a deputy.</p> <p>8 Q. So you had been there about a year when he</p> <p>9 started?</p> <p>10 A. Correct.</p> <p>11 Q. And throughout -- in the course of time you guys</p> <p>12 became friends; correct?</p> <p>13 A. Correct.</p> <p>14 Q. What have you been told about this case?</p> <p>15 A. Nothing. What I talked with attorney, county</p> <p>16 attorney Mr. Rands.</p> <p>17 Q. I'm going to caution you a little bit. I think</p> <p>18 you might fall within the privilege confines, because</p> <p>19 Mr. Rands represents the County.</p> <p>20 A. Correct.</p> <p>21 Q. I probably would have to agree you're high enough</p> <p>22 up in management that you would probably fall under the</p> <p>23 privilege, so you -- when I ask you these questions,</p> <p>24 please don't tell me what you discussed with Mr. Rands.</p> <p>25 Okay?</p>
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<p>1 correct?</p> <p>2 A. Correct.</p> <p>3 Q. How many deputies were invited to the wedding?</p> <p>4 A. I do not know.</p> <p>5 Q. More than one?</p> <p>6 A. I do not know.</p> <p>7 Q. Did you notice any other deputies there besides</p> <p>8 Mr. Mendoza?</p> <p>9 A. I didn't even notice Mr. Mendoza there.</p> <p>10 Q. It would be safe to say there weren't many</p> <p>11 deputies there; is that correct?</p> <p>12 A. I would say so. I didn't notice.</p> <p>13 Q. So it would be safe to say that -- let's assume</p> <p>14 that Mr. Mendoza was at the wedding. It would be safe</p> <p>15 to assume, then, that he was friends enough with Mr.</p> <p>16 Antinoro to get invited to his wedding; right?</p> <p>17 A. I guess so.</p> <p>18 Q. He wouldn't be crashing his wedding, would you --</p> <p>19 would he?</p> <p>20 A. I wouldn't think so.</p> <p>21 Q. How long have you known Mr. Antinoro?</p> <p>22 A. Since 2006.</p> <p>23 Q. First time you met him was in 2006?</p> <p>24 A. Correct.</p> <p>25 Q. Did you know Mr. Antinoro when he was in</p>	<p>1 A. Yes.</p> <p>2 MR. RANDS: Thank you, counsel.</p> <p>3 BY MR. FLANGAS:</p> <p>4 Q. However, if you did have a discussion with Mr.</p> <p>5 Rands, was there anybody else present other than</p> <p>6 yourself?</p> <p>7 A. No, there was not.</p> <p>8 Q. Is Mr. Rands representing you individually today?</p> <p>9 A. No, he is not.</p> <p>10 Q. I think I started this line of questioning asking</p> <p>11 you what you know about this case, and that's when we</p> <p>12 went on that little side venture about privilege. So</p> <p>13 what do you know about this case?</p> <p>14 A. Not much of anything.</p> <p>15 Q. What do you know?</p> <p>16 A. That a complaint was filed.</p> <p>17 Q. By who?</p> <p>18 A. Melanie Keener.</p> <p>19 Q. Against who?</p> <p>20 A. Sheriff Antinoro.</p> <p>21 Q. And what's the complaint about, that you know?</p> <p>22 A. Allegations of sexual harassment.</p> <p>23 Q. By Mr. Antinoro?</p> <p>24 A. Yes.</p> <p>25 Q. Do you know what the allegations are?</p>

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<p>1 A. No, I do not.</p> <p>2 Q. Do you know anything about the allegations?</p> <p>3 A. I have not read the complaint.</p> <p>4 Q. Okay. Well, do you understand it was filed in</p> <p>5 federal court?</p> <p>6 A. I do now.</p> <p>7 Q. Let's talk about the complaint a little bit.</p> <p>8 That might be a good starting point for us. I'm going</p> <p>9 to ask you some things about the complaint -- and before</p> <p>10 I get into that, you're the, as we've established,</p> <p>11 you're chief deputy for Storey County; right?</p> <p>12 A. Yes.</p> <p>13 Q. And that puts you as number two in the sheriff's</p> <p>14 office, as we've already established; correct?</p> <p>15 A. Correct.</p> <p>16 Q. Now, is the -- you're, what you would call, in</p> <p>17 kind of a supervisory capacity; right?</p> <p>18 A. Correct.</p> <p>19 Q. Leadership capacity as well; correct?</p> <p>20 A. Correct.</p> <p>21 Q. You want to lead from up front; right?</p> <p>22 A. Correct.</p> <p>23 Q. You want to lead by example; correct?</p> <p>24 A. Correct.</p> <p>25 Q. Now, as a law enforcement officer, you have a lot</p>	<p>1 you might be subject to blackmail. Would you agree with</p> <p>2 me?</p> <p>3 A. You try not to.</p> <p>4 Q. You try not to. You don't want to; right?</p> <p>5 A. You don't want to.</p> <p>6 Q. And you make a good effort not to be in a</p> <p>7 situation where you could be blackmailed; right?</p> <p>8 A. Correct.</p> <p>9 Q. And also that would hold true for extortion as</p> <p>10 well; right?</p> <p>11 A. Correct.</p> <p>12 Q. Wouldn't want to be in a situation, either in</p> <p>13 your personal life or your professional life, that would</p> <p>14 subject you to extortion; correct?</p> <p>15 A. Correct.</p> <p>16 Q. Wouldn't want to be, whether in your personal</p> <p>17 life or your professional life, engaging in any type of</p> <p>18 behavior that would put you -- subject you to coercion,</p> <p>19 would you?</p> <p>20 A. Correct.</p> <p>21 Q. Nor threats? Same thing with threats; right?</p> <p>22 A. Any of the above.</p> <p>23 Q. Right? Bribery as well?</p> <p>24 A. Correct.</p> <p>25 Q. You don't want to be in a position where you</p>
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<p>1 of responsibilities that the average citizen doesn't</p> <p>2 have; right?</p> <p>3 A. Correct.</p> <p>4 Q. And you're there to enforce the laws of Storey</p> <p>5 County; correct?</p> <p>6 A. Correct.</p> <p>7 Q. The laws of the state of Nevada; correct?</p> <p>8 A. Correct.</p> <p>9 Q. The laws of the United States; right?</p> <p>10 A. Correct.</p> <p>11 Q. And you're also allowed to carry a firearm; is</p> <p>12 that correct?</p> <p>13 A. Correct.</p> <p>14 Q. And you're also allowed to use lethal force if</p> <p>15 the situation dictates; right?</p> <p>16 A. Correct.</p> <p>17 Q. It's a grave responsibility, would you agree with</p> <p>18 me?</p> <p>19 A. Correct.</p> <p>20 Q. Would you also agree with me as a police officer,</p> <p>21 or a law enforcement officer, that you have to be above</p> <p>22 reproach?</p> <p>23 A. Correct.</p> <p>24 Q. Because you wouldn't want to get yourself,</p> <p>25 whether it was on duty or off duty, in a situation where</p>	<p>1 might have to pay hush money; right?</p> <p>2 A. Correct.</p> <p>3 Q. In other words, you don't want to be in a</p> <p>4 position where you might get squeezed. Would that be a</p> <p>5 good, good way to put it?</p> <p>6 A. I guess if you want to look at it that way.</p> <p>7 Q. That goes for both professional and personal</p> <p>8 life; right?</p> <p>9 A. Professional is different than personal, but yes.</p> <p>10 Q. Okay. Let's look at some of the allegations</p> <p>11 here. Are you familiar with a trip that Ms. Keener took</p> <p>12 with Mr. Antinoro to Ely, Nevada?</p> <p>13 A. I believe it was a sheriffs' and chiefs'.</p> <p>14 Q. Convention; right?</p> <p>15 A. Yes, sir.</p> <p>16 Q. And that was -- they were on duty when they did</p> <p>17 that; right?</p> <p>18 A. I believe so.</p> <p>19 Q. It's the responsibility for the sheriff to go</p> <p>20 there; correct?</p> <p>21 A. Yes.</p> <p>22 Q. Ms. Keener was there because she was the chief</p> <p>23 deputy at the time; right?</p> <p>24 A. Correct.</p> <p>25 Q. All right. Let's look at some of the allegations</p>

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<p>1 from the complaint. One, it says:</p> <p>2 "Mr. Antinoro told Ms. Keener his ex-wife wanted</p> <p>3 money from him and that he would give her money for</p> <p>4 screwing other guys in front of him."</p> <p>5 Okay? First question: Is that appropriate, is</p> <p>6 that an appropriate comment for a supervisor to tell his</p> <p>7 subordinate?</p> <p>8 A. I wasn't there. I don't know if it was told.</p> <p>9 Q. I just told you. You heard the statement. Let</p> <p>10 me just read the statement.</p> <p>11 A. Okay.</p> <p>12 Q. "Mr. Antinoro told Ms. Keener his ex-wife wanted</p> <p>13 money from him and that he would give her money for</p> <p>14 screwing other guys in front of him."</p> <p>15 Would that be an appropriate sentence, or</p> <p>16 statement, comment, however you want to characterize it,</p> <p>17 for a supervisor to tell their subordinate?</p> <p>18 MR. RANDS: I'm going to make an --</p> <p>19 interpose an objection here that it calls for</p> <p>20 speculation, calls for expert testimony, legal</p> <p>21 conclusion.</p> <p>22 And just so I don't have to do it every</p> <p>23 time, can I have a continuing objection to this line of</p> <p>24 questions?</p> <p>25 MR. FLANGAS: Absolutely. I'm glad you</p>	<p>1 him giving his ex-wife money for screwing other guys in</p> <p>2 front of him?</p> <p>3 A. That I do not know.</p> <p>4 Q. "Mr. Antinoro also told her that one black guy</p> <p>5 was pounding his ex-wife and he knew the guy's dick was</p> <p>6 choking her because he could hear her gagging. He then</p> <p>7 said 'choking her because his penis was so long it was</p> <p>8 choking her from below.'"</p> <p>9 Is that an appropriate comment for a supervisor</p> <p>10 to say to a subordinate?</p> <p>11 A. I would say not.</p> <p>12 Q. And it goes on:</p> <p>13 "Mr. Antinoro told Ms. Keener about The Green</p> <p>14 Door, a place in Las Vegas where people go to have sex</p> <p>15 with other people. He then proceeded to tell Ms. Keener</p> <p>16 about the sex rooms at The Green Door and how his</p> <p>17 ex-girlfriend liked going there."</p> <p>18 Is that an appropriate comment for a supervisor</p> <p>19 to tell a subordinate?</p> <p>20 A. Again, in the capacity as a supervisor, I'd say</p> <p>21 not. As a friend in a conversation, that's between the</p> <p>22 people having the conversation.</p> <p>23 Q. All right. If the conversation was neither asked</p> <p>24 for, solicited, would that be appropriate even, even</p> <p>25 though they're friends?</p>
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<p>1 asked that way. I wish more attorneys would do it that</p> <p>2 way.</p> <p>3 MR. RANDS: All right.</p> <p>4 BY MR. FLANGAS:</p> <p>5 Q. Go ahead and answer the question.</p> <p>6 A. As a supervisor, probably not.</p> <p>7 Q. All right.</p> <p>8 A. As a friend, who's to say.</p> <p>9 Q. Okay. Did Mr. Antinoro ever tell you that he</p> <p>10 engaged in that type of conduct where he would -- where</p> <p>11 his ex-wife wanted money, that he would give her money</p> <p>12 for screwing other guys in front of him?</p> <p>13 A. I did not hear that -- those exact words, no.</p> <p>14 Q. You've heard something similar; right?</p> <p>15 A. I guess, yes.</p> <p>16 Q. What have you heard?</p> <p>17 A. I didn't know anything about money or anything</p> <p>18 else. I knew his lifestyle.</p> <p>19 Q. Okay. Tell me about his lifestyle.</p> <p>20 A. No, that type of lifestyle.</p> <p>21 Q. Okay. He liked to have his ex-wife screw other</p> <p>22 guys in front of him?</p> <p>23 A. I -- the lifestyle of -- an open lifestyle.</p> <p>24 That's what I'm referring to.</p> <p>25 Q. All right. And so would that lifestyle include</p>	<p>1 A. No.</p> <p>2 Q. Then it says -- and that would be the same answer</p> <p>3 for the first several comments I told you as well?</p> <p>4 A. As a supervisor to the subordinate?</p> <p>5 Q. Correct.</p> <p>6 A. I answered, correct. As a supervisor and a</p> <p>7 friend type of relationship, depends on the friendship.</p> <p>8 Q. And if the friend didn't welcome those comments,</p> <p>9 or solicit those comments, it would be inappropriate;</p> <p>10 right?</p> <p>11 A. That would depend upon the friend.</p> <p>12 Q. Then it goes on to say:</p> <p>13 "Mr. Antinoro told Ms. Keener about going to</p> <p>14 strip clubs with his ex-girlfriend and how she would sit</p> <p>15 at the bar near the stage without underwear and show her</p> <p>16 tits to guys who tipped the dancers."</p> <p>17 Is that an appropriate comment for a supervisor</p> <p>18 to make to his subordinate?</p> <p>19 A. No.</p> <p>20 Q. "He also told Ms. Keener that his ex-girlfriend</p> <p>21 would let guys fondle her under her skirt while he</p> <p>22 watched from the bar."</p> <p>23 Is that an appropriate comment for a supervisor</p> <p>24 to say to his subordinate?</p> <p>25 A. Again, I'd say no.</p>

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<p>1 Q. "He also told Ms. Keener that his ex-girlfriend 2 would then take these guys to a place towards the 3 bathroom and have sex with them, and how he would then 4 go and watch." 5 Is that an appropriate comment for a supervisor 6 to say to his subordinate? 7 A. In the capacity of a supervisor to a subordinate, 8 no. Talking as a friend... 9 Q. Again, let's explore your friend thing. If the 10 friend who -- let's assume that Ms. Keener and Mr. 11 Antinoro were friends. Okay? 12 A. Uh-huh. 13 Q. We'll do that assumption. If Ms. Keener neither 14 solicited nor welcomed that type of talk, would it have 15 been appropriate for Mr. Antinoro to engage in that kind 16 of talk or make those comments to Ms. Keener, his 17 subordinate? 18 A. If she had objected to those comments as a 19 friend, then it would be no. 20 Q. So she has to object to it before it becomes 21 inappropriate? 22 A. Well, I'd say it would be incumbent upon her to 23 state that she didn't like that and... 24 Q. Okay. As the chief deputy you're responsible 25 enforcing the policies and procedures that affect the</p>	<p>1 (Exhibit 1 marked at this time.) 2 BY MR. FLANGAS: 3 Q. Okay. I've just had an exhibit marked No. 1 and 4 it's in front of you. Do you see that? 5 A. Yes, I do. 6 Q. Is that -- take a look at the document. It's 7 comprised of three pages. And because we don't have 8 Bates stamped numbers on it, for some reason, I'm going 9 to have to use the page numbers that are at the bottom 10 of the document. So if you'll look at the first page of 11 the document, at the very bottom it says "Storey County 12 Administrative Policies and Procedures, page 18 of 166;" 13 is that correct? 14 A. Yes, sir. 15 Q. If you'll turn to the next page, it says "page 19 16 of 166," and the next page, a third and final page, says 17 "page 20 of 166;" is that a correct statement? 18 A. That's correct. 19 Q. Okay. Let's look at the first page, which is 20 page 18 of 166. This is the county's anti-harassment 21 policy. As being the chief deputy, you've obviously 22 seen this document before; is that a correct statement? 23 A. No, I'm more familiar with the Storey County 24 Policy and Procedure. 25 Q. This is Storey County Administrative Policy --</p>
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<p>1 sheriff's department; right? 2 A. To an extent, yes. 3 Q. The ultimate enforcer for the sheriff's office 4 and obviously Sheriff Antinoro; isn't that correct? 5 A. Correct. 6 Q. But you share some of that burden as well as the 7 chief deputy; right? 8 A. I guess, yes. 9 Q. You're a supervisor; correct? 10 A. Yes. 11 Q. And I would assume the same would be true of your 12 sergeants as well, because they're supervising; right? 13 A. Correct. 14 Q. Chain of command; correct? 15 A. Correct. 16 Q. All right. So you've -- you know the policies 17 and procedures of the department, of the -- excuse me. 18 You know of the policies and procedures that 19 affect the sheriff's office; right? 20 A. I do. 21 Q. All right. 22 MR. FLANGAS: Let's have this marked as 23 Exhibit No. 1, please. And again, this will be a 24 non-Bates stamped one because for some reason they're 25 not coming out.</p>	<p>1 A. Sheriff's office. 2 Q. You're saying of the sheriff's office? Does the 3 sheriff's office have a separate anti-harassment policy? 4 A. In policy and procedure. 5 Q. For sexual harassment? 6 A. I don't believe there's -- it's touched upon. I 7 have seen this, yes. 8 Q. Okay. You said it's not touched upon. What do 9 you mean by that? 10 A. I said it's touched upon. 11 Q. What is touched upon? 12 A. Anti-harassment. 13 Q. All right. It's touched upon -- I'm not quite 14 following you, what you mean by "touched upon." 15 A. Not the same wording verbatim as Storey County 16 policy. 17 Q. So I guess the answer to my question is, is the 18 sheriff's office has its own anti-harassment policy? 19 A. No. They have their own policy and procedure, 20 and it's -- I believe a section of this is in that 21 policy and procedure. 22 Q. All right. So the Storey County Administrative 23 Policy and Procedure, as it deals with anti-harassment, 24 has been incorporated into the sheriff's office policy 25 and procedures?</p>

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<p>1 A. In the Lexipol.</p> <p>2 Q. And Lexipol is the system which is, essentially,</p> <p>3 I believe, an electronic version of the policy and</p> <p>4 procedures for Storey County? Or excuse me, for the</p> <p>5 sheriff's office.</p> <p>6 A. Correct.</p> <p>7 Q. And does it update the policies?</p> <p>8 A. Does Lexipol update the policies?</p> <p>9 Q. Yes.</p> <p>10 A. Yes, it does.</p> <p>11 Q. Now, are people that worked in the sheriff's</p> <p>12 office, are they required to go on Lexipol and check to</p> <p>13 see if there's updates?</p> <p>14 A. Everybody has a log-in, yes.</p> <p>15 Q. And for the court reporter, spell the Lexipol?</p> <p>16 A. L-e-x-i-p-o-l.</p> <p>17 Q. You mentioned everybody has a log-in number?</p> <p>18 A. A log-in password.</p> <p>19 Q. A log-in password? How frequently are members of</p> <p>20 the sheriff's office required to log in on Lexipol?</p> <p>21 A. Yearly to review the policy, and daily for daily</p> <p>22 training bulletins.</p> <p>23 Q. As a supervisor, do you oversee whether or not</p> <p>24 people underneath you are logging in like they're</p> <p>25 supposed to on Lexipol?</p>	<p>1 Q. All right. So the deputies -- it's the personal</p> <p>2 responsibility of the deputies --</p> <p>3 A. Correct.</p> <p>4 Q. -- to log in; right?</p> <p>5 A. Correct.</p> <p>6 Q. It's also the responsibility of the sergeants</p> <p>7 that the deputies work for to ensure they're logging in</p> <p>8 as well; is that a correct statement?</p> <p>9 A. Correct.</p> <p>10 Q. And then it's the responsibility of you, as the</p> <p>11 chief deputy, to make sure the sergeants and the</p> <p>12 deputies are logging in; right?</p> <p>13 A. Correct.</p> <p>14 Q. And ultimately it's the responsibility of the</p> <p>15 sheriff to see that as well.</p> <p>16 A. Correct.</p> <p>17 Q. Do you know whether or not the sheriff gets a</p> <p>18 printout every month to make sure everybody's been</p> <p>19 logging in?</p> <p>20 A. That I do not know.</p> <p>21 Q. Now, a little while ago -- let's look at the</p> <p>22 first page of Exhibit No. 1, which is the</p> <p>23 anti-harassment, and it's got -- at the upper right-hand</p> <p>24 corner it's number 202; right?</p> <p>25 A. Correct.</p>
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<p>1 A. Yes, I do.</p> <p>2 Q. Okay. How do you do that?</p> <p>3 A. I log into Lexipol.</p> <p>4 Q. You log into it and then that lets you see who</p> <p>5 else has logged into it?</p> <p>6 A. Correct.</p> <p>7 Q. You get a printout that says on this day these</p> <p>8 folks logged in?</p> <p>9 A. I've never printed anything out.</p> <p>10 Q. Is the ability there to do that?</p> <p>11 A. I believe so.</p> <p>12 Q. Is the ability there to just look at it and see</p> <p>13 who's logged in?</p> <p>14 A. I believe so.</p> <p>15 Q. Do you have something in place that checks to</p> <p>16 make sure people log in daily to see the updates?</p> <p>17 A. No, they're just advised to do that.</p> <p>18 Q. If somebody doesn't log in for two or</p> <p>19 three weeks, is there something in the system that would</p> <p>20 alert you, saying that person hasn't logged in for two</p> <p>21 or three weeks?</p> <p>22 A. I don't believe so.</p> <p>23 Q. Who's responsible to make sure that all the folks</p> <p>24 are logging in to Lexipol on a daily basis?</p> <p>25 A. Supervisors. The individual, the deputies.</p>	<p>1 Q. That identifies the policy; correct?</p> <p>2 A. Correct.</p> <p>3 Q. If you look at number two on here, which is</p> <p>4 "Prohibited Conduct. Behavior," and it's got the "S" in</p> <p>5 parens; right?</p> <p>6 A. It has -- yes.</p> <p>7 Q. Okay. And it's got a paragraph, I won't read it</p> <p>8 all in the record because the document speaks for</p> <p>9 itself, but it's the last sentence in that -- on that</p> <p>10 first paragraph under "Prohibited Conduct.</p> <p>11 Behavior(s)," it says:</p> <p>12 "Examples of prohibited conduct/behavior include,</p> <p>13 but are not limited to," and then it has number 19;</p> <p>14 correct?</p> <p>15 A. Correct.</p> <p>16 Q. And it says:</p> <p>17 "Offensive verbal communication including slurs,</p> <p>18 jokes, epithets, derogatory comments, degrading or</p> <p>19 suggestive words or comments, unwanted sexual advances,</p> <p>20 invitations, or sexually degrading or suggestive words</p> <p>21 or comments."</p> <p>22 It says that; right?</p> <p>23 A. Correct.</p> <p>24 Q. So that's the policy. It says, essentially it</p> <p>25 says don't do it; right?</p>

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<p>1 A. That's what the policy says.</p> <p>2 Q. All right. Now, a little while ago you said</p> <p>3 that, that the person who the comments are directed at</p> <p>4 to should -- has to say stop, or something to that</p> <p>5 effect; right? Or object to it, right?</p> <p>6 A. Or report.</p> <p>7 Q. Or report. But, but I think what you said</p> <p>8 earlier is that they have to, you know, object to it to</p> <p>9 the person doing the, the speaking to them, if I'm not</p> <p>10 mistaken. I mean, we can go back and have the record</p> <p>11 read, but, I mean, will you accept that premise as to</p> <p>12 what you said?</p> <p>13 A. I believe I said that.</p> <p>14 Q. All right. Now, if you'll turn to the second</p> <p>15 page of this document, which is page 19 of 166, and this</p> <p>16 one in the upper right-hand corner has a "number," and</p> <p>17 across from "number" it says "203;" right?</p> <p>18 A. Correct.</p> <p>19 Q. That would identify this as policy number 203;</p> <p>20 right?</p> <p>21 A. Correct.</p> <p>22 Q. And then below it it's got in bold type,</p> <p>23 "Employee Responsibilities;" right?</p> <p>24 A. Yes, it does.</p> <p>25 Q. And the document speaks for itself, but I'll kind</p>	<p>1 A. Correct.</p> <p>2 Q. So there's no affirmative duty on the part of the</p> <p>3 person who's allegedly being harassed to tell the</p> <p>4 harasser to stop. Would you agree with me?</p> <p>5 A. Well, number 25 states: "If the employee feels</p> <p>6 uncomfortable in speaking." But yes.</p> <p>7 Q. Okay. Now let's go back to some of these</p> <p>8 allegations, here.</p> <p>9 MR. RANDS: Before we get into that, could</p> <p>10 we take a quick break? I need to make a phone call.</p> <p>11 MR. FLANGAS: Certainly.</p> <p>12 (A short break was taken at this time.)</p> <p>13 MR. FLANGAS: We're back on the record.</p> <p>14 BY MR. FLANGAS:</p> <p>15 Q. Mr. Dosen, you understand you're still under</p> <p>16 oath?</p> <p>17 A. Yes, I do.</p> <p>18 Q. Okay. Now let's, let's kind of go down some of</p> <p>19 these things here that I just went down with -- you</p> <p>20 know, went over before. And I know I asked this</p> <p>21 question, but it was going to be kind of the lead-in to</p> <p>22 the rest of them because we digressed from it.</p> <p>23 Now, did -- do you know if -- that's not the</p> <p>24 way -- did Mr. Antinoro pay his ex-wife for screwing</p> <p>25 other guys in front of him?</p>
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<p>1 of go down a little bit. We'll go -- underneath number</p> <p>2 two, "Employee Responsibilities," it's got the number 24</p> <p>3 underneath there; correct?</p> <p>4 A. Correct.</p> <p>5 Q. Under 24 there's a note. Do you see the note?</p> <p>6 A. Yes, I do.</p> <p>7 Q. And it says:</p> <p>8 "Note: An employee is NOT required to talk</p> <p>9 directly to the alleged harasser or to the employee's</p> <p>10 supervisor."</p> <p>11 Is that what it says?</p> <p>12 A. Yes, it does.</p> <p>13 Q. So she doesn't have to talk to him; right?</p> <p>14 A. Doesn't have to talk to who?</p> <p>15 Q. To the harasser. So let's assume that the, the</p> <p>16 speech that Mr. Antinoro is engaging in with Ms. Keener</p> <p>17 is harassing speech. That would make him a harasser;</p> <p>18 right?</p> <p>19 A. By --</p> <p>20 MR. RANDS: Objection, calls for a legal</p> <p>21 conclusion. Go ahead.</p> <p>22 THE WITNESS: By this.</p> <p>23 BY MR. FLANGAS:</p> <p>24 Q. So it says an employee's not required to talk</p> <p>25 directly to the alleged harasser; correct?</p>	<p>1 MR. RANDS: I'm going to just interpose the</p> <p>2 same objections as before in a continuing nature.</p> <p>3 MR. FLANGAS: Certainly.</p> <p>4 THE WITNESS: I have no idea.</p> <p>5 BY MR. FLANGAS:</p> <p>6 Q. Did he ever tell you?</p> <p>7 A. No. Of the payment, no.</p> <p>8 Q. He did tell you of a lifestyle where he liked to</p> <p>9 watch other guys screw his girlfriend, or ex-wife, as</p> <p>10 the case may be; right?</p> <p>11 A. Of the lifestyle, yes.</p> <p>12 Q. Okay. Did Mr. Antinoro ever tell you about a</p> <p>13 black guy that was pounding his ex-wife?</p> <p>14 A. I heard many conversations. I don't know.</p> <p>15 Q. But you've heard conversations to that, to that</p> <p>16 effect; is that a correct statement?</p> <p>17 A. Correct.</p> <p>18 Q. And you heard that from Mr. Antinoro; is that</p> <p>19 right?</p> <p>20 A. Correct.</p> <p>21 Q. And you heard statements from Mr. Antinoro</p> <p>22 that -- let me rephrase that.</p> <p>23 Did you hear statements from Mr. Antinoro about</p> <p>24 the guy's dick choking her because he could hear her</p> <p>25 gagging?</p>

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<p>1 A. I did not hear that statement, no.</p> <p>2 Q. Did you hear from Mr. Antinoro that he was</p> <p>3 choking her because his penis was so long it was choking</p> <p>4 her from below?</p> <p>5 A. I did not hear that statement.</p> <p>6 Q. What's Mr. Antinoro's ex-wife's name?</p> <p>7 A. I believe it's Laura. Lori.</p> <p>8 Q. L-o-r-i?</p> <p>9 A. I have no idea. I don't know how to spell it.</p> <p>10 Q. What's her last name, Antinoro?</p> <p>11 A. I, I don't know.</p> <p>12 Q. Okay. All right. Are you aware that Mr.</p> <p>13 Antinoro goes to The Green Door in Las Vegas?</p> <p>14 A. I've heard him say it.</p> <p>15 Q. What is The Green Door?</p> <p>16 A. It's a, I guess, swingers type atmosphere.</p> <p>17 Q. Have you heard about him going to The Green Door</p> <p>18 with his ex-girlfriend?</p> <p>19 A. I believe there was mention of it. I don't know</p> <p>20 if it for sure happened.</p> <p>21 Q. Mention of it by Mr. Antinoro?</p> <p>22 A. Yes.</p> <p>23 Q. Who's his ex-girlfriend? What's her name?</p> <p>24 A. Adrianna -- I don't -- the last name Ko -- I'm</p> <p>25 not sure how to pronounce it.</p>	<p>1 Q. Did there come a point in time where you had to</p> <p>2 go get his weapons?</p> <p>3 A. I did not get his weapons.</p> <p>4 Q. Did he give you his weapons?</p> <p>5 A. No, he did not. He gave my girlfriend -- my wife</p> <p>6 a weapon.</p> <p>7 Q. So he didn't, he didn't give you his weapons</p> <p>8 because he was despondent?</p> <p>9 A. I don't believe he did. I believe my wife got</p> <p>10 it.</p> <p>11 Q. Do you remember testifying in the Gilman versus</p> <p>12 Antinoro matter?</p> <p>13 A. I do.</p> <p>14 Q. Do you remember testifying that you went out</p> <p>15 there and got the weapons from him?</p> <p>16 A. I don't recall, but like I said, I -- it could</p> <p>17 have. I remember my wife got one.</p> <p>18 Q. Got one. As a gift?</p> <p>19 A. No.</p> <p>20 Q. To get it away from him?</p> <p>21 A. Correct.</p> <p>22 Q. And that was because you all were worried he</p> <p>23 might hurt himself?</p> <p>24 A. Just to limit any possibilities.</p> <p>25 Q. Of him hurting himself; right?</p>
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<p>1 Q. Something like Kovacevich, or something?</p> <p>2 A. Something along those lines, yes.</p> <p>3 MR. FLANGAS: I'll get you a spelling after,</p> <p>4 because I do have it written down somewhere with the</p> <p>5 appropriate spelling.</p> <p>6 BY MR. FLANGAS:</p> <p>7 Q. Where is this Adrianna these days?</p> <p>8 A. I have no idea.</p> <p>9 Q. When is the last time you talked to her?</p> <p>10 A. Probably before they broke up.</p> <p>11 Q. When was that?</p> <p>12 A. I, I believe a couple years ago.</p> <p>13 Q. Let's talk about that break-up for a moment.</p> <p>14 That break-up seemed to adversely affect Mr. Antinoro;</p> <p>15 is that a correct statement?</p> <p>16 A. I guess you can look at it that way.</p> <p>17 Q. Or am I understating it?</p> <p>18 A. No, I'm sure it affected him.</p> <p>19 Q. It affected him to the point that he quit showing</p> <p>20 up for work?</p> <p>21 A. Intermittently.</p> <p>22 Q. Did there come a point in time where you had to</p> <p>23 go out, you and Ms. Keener had to go out there and do a</p> <p>24 wellness check on him?</p> <p>25 A. We checked on him a few times, yes.</p>	<p>1 A. The possibility.</p> <p>2 Q. Okay. Or hurting somebody else?</p> <p>3 A. Well, just take them for safekeeping.</p> <p>4 Q. Are you aware of a SWAT team being called out to</p> <p>5 Mr. Antinoro's residence because he was shooting up --</p> <p>6 shooting off his weapon?</p> <p>7 A. No, I do not.</p> <p>8 Q. You never heard of that?</p> <p>9 A. No, I did not.</p> <p>10 Q. You're just hearing it for the first time today?</p> <p>11 A. A SWAT team?</p> <p>12 Q. SWAT team having to go to his residence because</p> <p>13 he discharged his firearm.</p> <p>14 A. Storey County?</p> <p>15 Q. In Storey County.</p> <p>16 A. No, I never heard that.</p> <p>17 Q. In Wendover?</p> <p>18 A. That's not Storey County.</p> <p>19 Q. I know, and I said "and in Wendover."</p> <p>20 A. I heard of an incident. I don't recall where it</p> <p>21 was.</p> <p>22 Q. Did it occur in Storey County or in Wendover?</p> <p>23 A. I -- like I said, I can't answer. I don't know</p> <p>24 where it was.</p> <p>25 Q. Does Storey County have a SWAT team?</p>

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<p>1 A. No, it does not.</p> <p>2 Q. So if a SWAT team came, it would probably have to</p> <p>3 come from Sparks or Reno?</p> <p>4 A. Or Carson or Douglas or Lyon County.</p> <p>5 Q. Lyon County has a SWAT team?</p> <p>6 A. Yes, it does.</p> <p>7 Q. All right. You said you heard of an incident.</p> <p>8 What did you hear of?</p> <p>9 A. That he had discharged a weapon.</p> <p>10 Q. When did this occur?</p> <p>11 A. I have no idea.</p> <p>12 Q. It occurred while he was sheriff?</p> <p>13 A. I don't believe so.</p> <p>14 Q. It occurred while he was a deputy sheriff?</p> <p>15 A. I don't believe so.</p> <p>16 Q. It occurred while he was a sergeant?</p> <p>17 A. I believe he was with a different agency.</p> <p>18 Q. Well, it didn't happen in Storey County?</p> <p>19 A. I don't believe so.</p> <p>20 Q. And did Mr. Antinoro ever tell you that he liked</p> <p>21 going to strip clubs with his ex-girlfriend, where she</p> <p>22 would sit at the, at the bar near the stage and show her</p> <p>23 tits to guys?</p> <p>24 A. He told me they went to the strip club.</p> <p>25 Q. Did he also tell you that he liked to have his</p>	<p>1 A. I may have heard mention of it, but I don't</p> <p>2 believe that.</p> <p>3 Q. Who did you hear mention of that from?</p> <p>4 A. I believe the sheriff.</p> <p>5 Q. Now, the sheriff's been accused of rape; is that</p> <p>6 a correct statement? Let me make sure this is clear on</p> <p>7 the record.</p> <p>8 Mr. Antinoro has been accused of rape; correct?</p> <p>9 A. Accused.</p> <p>10 Q. Okay. And that was in Sparks; right?</p> <p>11 A. I do believe so, yes.</p> <p>12 Q. Occurred, what, about eight or nine, ten -- eight</p> <p>13 or nine years ago?</p> <p>14 A. At least, yes.</p> <p>15 Q. And this occurred with a woman that you were</p> <p>16 dating; right?</p> <p>17 A. Correct.</p> <p>18 Q. All right. And then you guys were having a</p> <p>19 threesome and she accused Mr. Antinoro at some point in</p> <p>20 time of raping her?</p> <p>21 A. That's how it's stated, yes.</p> <p>22 Q. Did she accuse you of raping her?</p> <p>23 A. I don't believe so.</p> <p>24 Q. Just him?</p> <p>25 A. I believe so.</p>
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<p>1 girlfriend showing her tits to guys?</p> <p>2 A. He may have said that.</p> <p>3 Q. Did he also tell you that this ex-girlfriend</p> <p>4 would let guys fondle her under her skirt while he</p> <p>5 watched from the bar?</p> <p>6 A. I believe he said that.</p> <p>7 Q. Did he also tell you, then, that he would -- that</p> <p>8 his ex-girlfriend would then take these guys to a place</p> <p>9 somewhere on the premises and have sex with them so he</p> <p>10 could watch?</p> <p>11 A. I do believe so.</p> <p>12 Q. Now, this Adrianna broke up with Mr. Antinoro;</p> <p>13 right?</p> <p>14 A. They're no longer together, yes.</p> <p>15 Q. Is that because he allowed her to be, for lack of</p> <p>16 a better term, raped?</p> <p>17 A. I don't believe so.</p> <p>18 Q. Did he set up, did he set up situations where she</p> <p>19 would have sex with multiple partners while he watched?</p> <p>20 A. I believe they engaged in that.</p> <p>21 Q. Did she get angry because that occurred and she</p> <p>22 didn't want to be part of it?</p> <p>23 A. I don't believe so.</p> <p>24 Q. You don't believe so? Had you heard that before,</p> <p>25 though?</p>	<p>1 Q. Did that stem from the episode where you guys</p> <p>2 were having a threesome, or did that stem from a</p> <p>3 separate episode where he was with her alone?</p> <p>4 A. I don't believe there was a separate episode.</p> <p>5 Q. Would it surprise you that Mr. Antinoro testified</p> <p>6 that he had a separate episode at this lady's house</p> <p>7 where you weren't involved?</p> <p>8 A. That's unaware to me.</p> <p>9 Q. Did Mr. Antinoro rape this lady?</p> <p>10 A. No, he did not.</p> <p>11 Q. What was the lady's name?</p> <p>12 A. Penny Jensen.</p> <p>13 Q. Where is Ms. Jensen now?</p> <p>14 A. I have no idea.</p> <p>15 Q. When was the last time you saw her or talked to</p> <p>16 her?</p> <p>17 A. 2013.</p> <p>18 Q. Did you ever see the police report accusing Mr.</p> <p>19 Antinoro of raping -- or the police report -- let's not</p> <p>20 say "accusing." Let's use a different term.</p> <p>21 Did you ever see the police report pertaining to</p> <p>22 the allegations of Penny Jensen being raped by Mr.</p> <p>23 Antinoro?</p> <p>24 A. I saw the report.</p> <p>25 Q. And how did it come to pass that you saw the</p>

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<p>1 report?</p> <p>2 A. It was circulated around the Lockwood area.</p> <p>3 Q. What came of the allegations of rape?</p> <p>4 A. I believe that it just ended.</p> <p>5 Q. Do you know why?</p> <p>6 A. No, I do not.</p> <p>7 Q. Did Mr. Antinoro tell you why it ended?</p> <p>8 A. Why the report ended?</p> <p>9 Q. Why the allegations of rape -- let me put it this</p> <p>10 way: Was he prosecuted for rape?</p> <p>11 A. No, he was not.</p> <p>12 Q. Do you know why he wasn't prosecuted for rape?</p> <p>13 A. No, I do not.</p> <p>14 Q. Did you ever hear that maybe the statute of</p> <p>15 limitations had run on it and that's why he wasn't</p> <p>16 prosecuted?</p> <p>17 A. Okay.</p> <p>18 Q. I'm not asking you to agree with me, I'm asking</p> <p>19 if you ever heard that.</p> <p>20 A. No, I did not.</p> <p>21 Q. Have you ever heard of any other allegations of</p> <p>22 rape on Mr. Antinoro?</p> <p>23 A. Yes, I have.</p> <p>24 Q. What other allegations have you heard?</p> <p>25 A. A letter was circulated before an election in</p>	<p>1 A. No. Circulated around town.</p> <p>2 Q. Did Mr. Antinoro ever tell you that he tried to</p> <p>3 entice Ms. Enloe to have sex with somebody else while he</p> <p>4 watched?</p> <p>5 A. I can't honestly recall.</p> <p>6 Q. And when I say that, was it with one or more</p> <p>7 partners? Did you hear anything like that?</p> <p>8 A. I heard it involved several black individuals.</p> <p>9 Q. You didn't hear that from -- did you hear that</p> <p>10 from Mr. Antinoro himself?</p> <p>11 A. No, I did not.</p> <p>12 Q. Have you ever -- now, you said you heard other</p> <p>13 allegations of rape, you said you saw it in a flier, or</p> <p>14 a circular, during the 2014 campaign; right?</p> <p>15 A. Correct.</p> <p>16 Q. All right. Now, we got the one allegation of</p> <p>17 rape that comes out of Sparks; right?</p> <p>18 A. Correct.</p> <p>19 Q. What was the year that the alleged rape took</p> <p>20 place?</p> <p>21 A. I have no idea.</p> <p>22 Q. Now, you're part of the lifestyle with Mr.</p> <p>23 Antinoro yourself; correct?</p> <p>24 A. I've been in that lifestyle, correct.</p> <p>25 Q. Watching your, your girlfriend, or whatever, have</p>
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<p>1 2014.</p> <p>2 Q. And what did the letter state?</p> <p>3 A. I didn't read the letter, I was just advised of</p> <p>4 it.</p> <p>5 Q. Do you know April Enloe?</p> <p>6 A. I do.</p> <p>7 Q. Who was she?</p> <p>8 A. She was the former director at the senior center.</p> <p>9 Q. Did Mr. Antinoro have a relationship with Ms.</p> <p>10 Enloe?</p> <p>11 A. I believe they dated.</p> <p>12 Q. Did they have sex?</p> <p>13 A. I have no idea.</p> <p>14 Q. Is Ms. Enloe a county employee?</p> <p>15 A. She was.</p> <p>16 Q. She was. Did you ever hear from Mr. Antinoro</p> <p>17 that the reason he broke off -- broke up with Ms. Enloe</p> <p>18 is because she got angry because he wanted her to have</p> <p>19 sex with multiple partners while he watched?</p> <p>20 A. I heard that, but I didn't -- I'm not aware if</p> <p>21 that's why they broke up.</p> <p>22 Q. But you heard that that, that occurred with Mr.</p> <p>23 Antinoro; right?</p> <p>24 A. I heard that allegation, yes.</p> <p>25 Q. From Mr. Antinoro?</p>	<p>1 sex with other people, that's part of your lifestyle?</p> <p>2 A. In the past I've participated, yes.</p> <p>3 Q. Threesomes?</p> <p>4 A. Yes.</p> <p>5 Q. And you've engaged in threesomes with Sheriff</p> <p>6 Antinoro?</p> <p>7 A. Once.</p> <p>8 Q. Once? When was that?</p> <p>9 A. I have no idea.</p> <p>10 Q. Last couple of years, three years?</p> <p>11 A. No. Farther back.</p> <p>12 Q. Farther back?</p> <p>13 These allegations of rape, other than, other than</p> <p>14 this Penny Jensen, any other names come to mind of who</p> <p>15 he was alleged to have raped?</p> <p>16 A. Barnes.</p> <p>17 Q. Jennifer Barnes?</p> <p>18 A. Jennifer Barnes, yes.</p> <p>19 Q. Who is Jennifer Barnes?</p> <p>20 A. She works, or was employed at the Mustang Ranch.</p> <p>21 Q. What did you hear about this?</p> <p>22 A. That supposedly I was involved in it, back in</p> <p>23 1988.</p> <p>24 Q. You were involved in 1988 with Jennifer Barnes?</p> <p>25 A. And the rape of, yes.</p>

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<p>1 Q. Where did this alleged rape take place --</p> <p>2 A. I believe --</p> <p>3 Q. -- or occur?</p> <p>4 A. -- Angel Lake.</p> <p>5 Q. Where is Angel Lake located?</p> <p>6 A. South of Wells, Nevada.</p> <p>7 Q. And you were supposed to have been involved in</p> <p>8 this?</p> <p>9 A. Myself and Sheriff Antinoro.</p> <p>10 Q. Were you and Sheriff Antinoro in Angel Lake at</p> <p>11 the time of this alleged rape?</p> <p>12 A. In 1988, no.</p> <p>13 Q. When would you and Mr. Antinoro have been</p> <p>14 together in Angel Lake? Because I'm asking that based</p> <p>15 on your answer to the last question.</p> <p>16 A. Never.</p> <p>17 Q. So you've never been to Angel Lake with Mr.</p> <p>18 Antinoro?</p> <p>19 A. No.</p> <p>20 Q. I've heard testimony that you and Mr. Antinoro go</p> <p>21 way back, beyond sheriff's deputy time at Storey County,</p> <p>22 that you knew each other years prior to that. Is that a</p> <p>23 mistaken testimony?</p> <p>24 A. Yes, it is.</p> <p>25 Q. So the first time you ever met Mr. Antinoro was</p>	<p>1 Q. Did she ever -- do you know whether or not she's</p> <p>2 filed a sexual harassment claim?</p> <p>3 A. I know she filed the claim, I didn't know it was</p> <p>4 sexual harassment, if that's what it was.</p> <p>5 Q. I will represent it's sexual harassment and</p> <p>6 wrongful termination.</p> <p>7 A. I knew of the wrongful termination.</p> <p>8 Q. Do you know who she's filed the sexual harassment</p> <p>9 case against?</p> <p>10 A. I believe the county.</p> <p>11 Q. And who else?</p> <p>12 A. The sexual harassment, I'm not sure. The</p> <p>13 wrongful termination I believe was the county and the</p> <p>14 sheriff.</p> <p>15 Q. What's your understanding of what she's suing</p> <p>16 them about?</p> <p>17 A. For wrongful termination.</p> <p>18 Q. Why is she claiming she was wrongfully</p> <p>19 terminated?</p> <p>20 A. I believe she was terminated due to an escape,</p> <p>21 and she felt it wasn't her fault.</p> <p>22 Q. Did Mr. Antinoro ever date Ms. Adrian?</p> <p>23 A. I don't believe so.</p> <p>24 Q. Do you know Melissa Reed?</p> <p>25 A. Yes, I do.</p>
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<p>1 2006?</p> <p>2 A. In person, correct.</p> <p>3 Q. In person. You'd heard about him prior to that?</p> <p>4 A. I heard the name, yes.</p> <p>5 Q. Why would you have heard the name?</p> <p>6 A. I was with the NHP out in Wells and Elko, and he</p> <p>7 was in West Wendover.</p> <p>8 Q. Had there been instances of sexual harassment,</p> <p>9 that you're aware of, in the sheriff's office?</p> <p>10 A. Past?</p> <p>11 Q. Yes.</p> <p>12 A. Not that I'm aware of.</p> <p>13 Q. Have you heard of any?</p> <p>14 A. Not off the top of my head.</p> <p>15 Q. Ms. Keener the only case you've ever heard?</p> <p>16 MR. RANDS: I'm going to just interpose an</p> <p>17 objection at this point, calls for a legal conclusion.</p> <p>18 But with that objection, go ahead and answer.</p> <p>19 THE WITNESS: Like I stated, off the top of</p> <p>20 my head, of what I recall, there may have been.</p> <p>21 BY MR. FLANGAS:</p> <p>22 Q. Do you know a Vanessa Adrian?</p> <p>23 A. Yes, I do.</p> <p>24 Q. Who is Vanessa Adrian?</p> <p>25 A. She was a former deputy, worked in corrections.</p>	<p>1 Q. Who's Ms. Reed?</p> <p>2 A. A former jailer, corrections officer.</p> <p>3 Q. She brought a claim against the county as well;</p> <p>4 right?</p> <p>5 A. I believe for wrongful termination.</p> <p>6 Q. Did she ever date Mr. Antinoro?</p> <p>7 A. Not that I'm aware of.</p> <p>8 Q. Has Mr. -- has Mr. Antinoro ever dated anybody in</p> <p>9 the sheriff's office?</p> <p>10 A. Not that I'm aware of.</p> <p>11 Q. Do you know of a lady named Rachel, a</p> <p>12 receptionist?</p> <p>13 A. She's a dispatcher.</p> <p>14 Q. Dispatcher? What's Rachel's last name?</p> <p>15 MR. RANDS: She's going to get offended if</p> <p>16 you keep calling her a receptionist --</p> <p>17 MR. FLANGAS: Instead of dispatcher?</p> <p>18 MR. RANDS: -- instead of a dispatcher.</p> <p>19 MR. FLANGAS: My mistake.</p> <p>20 BY MR. FLANGAS:</p> <p>21 Q. So what's Rachel's --</p> <p>22 A. It was Rachel Smiley, and I believe -- she got</p> <p>23 married. I don't know what her...</p> <p>24 Q. Are you aware there's been testimony that Mr.</p> <p>25 Antinoro dated Rachel?</p>

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<p>1 A. I'm aware of that, yes.</p> <p>2 Q. Are you aware that there's testimony to that</p> <p>3 regard?</p> <p>4 A. No, I'm not.</p> <p>5 Q. Are you aware that Mr. Antinoro did date Rachel?</p> <p>6 A. Yes. I just said I'm aware of that.</p> <p>7 Q. I have to make sure the record's clear, so</p> <p>8 sometimes I may repeat these questions --</p> <p>9 A. That's fine.</p> <p>10 Q. -- because the question and answer may not line</p> <p>11 up.</p> <p>12 MR. RANDS: Almost certainly he will repeat</p> <p>13 these questions.</p> <p>14 MR. FLANGAS: Ten or fifteen more times,</p> <p>15 but...</p> <p>16 BY MR. FLANGAS:</p> <p>17 Q. Now, Rachel is a -- an employee with the</p> <p>18 sheriff's office; right?</p> <p>19 A. No, she's not.</p> <p>20 Q. Who is she an employee of?</p> <p>21 A. The county.</p> <p>22 Q. So she's a dispatcher that works in the sheriff's</p> <p>23 office?</p> <p>24 A. No.</p> <p>25 Q. When you say she's a dispatcher, what does she</p>	<p>1 Q. Has Mr. Antinoro ever dated any type of a</p> <p>2 volunteer for, for the County of Story? And that would</p> <p>3 include the sheriff's office.</p> <p>4 A. Not that I can recall.</p> <p>5 Q. Has Mr. Antinoro, on some of his dating things,</p> <p>6 ever used his county vehicle on some of these dates?</p> <p>7 A. Not that I'm aware of.</p> <p>8 Q. Has Mr. Antinoro ever had sex on county</p> <p>9 facilities?</p> <p>10 A. Not that I'm aware of.</p> <p>11 Q. Did he ever tell you that he had sex in county</p> <p>12 facilities?</p> <p>13 A. No, not that I recall.</p> <p>14 Q. Did Mr. Antinoro ever tell you that he took --</p> <p>15 had women in his official county car who were not</p> <p>16 deputies or employees?</p> <p>17 A. That had women?</p> <p>18 Q. Did Mr. Antinoro ever tell you he had women in</p> <p>19 his official county car who were not either a county</p> <p>20 employee or an employee of the sheriff's office?</p> <p>21 A. Not that I recall.</p> <p>22 MR. FLANGAS: Off the record.</p> <p>23 (An off the record discussion was held at this time.)</p> <p>24 MR. FLANGAS: All right. If I could have</p> <p>25 this marked as No. 2, please.</p>
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<p>1 do?</p> <p>2 A. Works in the communications center as a</p> <p>3 dispatcher.</p> <p>4 Q. For the sheriff's department?</p> <p>5 A. No.</p> <p>6 Q. Explain that to me. I'm trying to --</p> <p>7 A. There's, there's --</p> <p>8 Q. Let me finish.</p> <p>9 A. Okay.</p> <p>10 Q. "Dispatcher," to me, reminds me of the 911 or</p> <p>11 somebody that goes, "Go to this place right here," and</p> <p>12 things like that.</p> <p>13 A. They're their own entity. They dispatch for</p> <p>14 sheriff's office, fire department, medical.</p> <p>15 Q. All right. She's a county employee, then, you</p> <p>16 would agree --</p> <p>17 A. Correct.</p> <p>18 Q. -- with me.</p> <p>19 Has -- does, does the sheriff's office supervise</p> <p>20 the dispatchers?</p> <p>21 A. No, they do not.</p> <p>22 Q. Does the -- has Mr. Antinoro ever dated any other</p> <p>23 county employees other than Rachel? That would include</p> <p>24 sheriff's office.</p> <p>25 A. Not that I'm aware of.</p>	<p>1 (Exhibit 2 marked at this time.)</p> <p>2 BY MR. FLANGAS:</p> <p>3 Q. I'm showing you what's been marked as Plaintiff's</p> <p>4 2. Do you have that in front of you?</p> <p>5 A. Yes, I do.</p> <p>6 Q. I'll represent to you that this is a statement by</p> <p>7 Melanie Keener, and if you'll look in the lower</p> <p>8 right-hand corner there's a number. It says MK 001.</p> <p>9 A. Correct.</p> <p>10 Q. Okay. That's called a Bates stamps number. And</p> <p>11 I'm going to leave the zeros off when I refer to this</p> <p>12 from now on, so that will be MK 1.</p> <p>13 A. Correct.</p> <p>14 Q. Would you verify that the document goes from MK 1</p> <p>15 to MK 8.</p> <p>16 A. Yes, it does.</p> <p>17 Q. Okay. Let's start at the bottom of the first</p> <p>18 full paragraph. It says:</p> <p>19 "After the" -- well, before we get into this, let</p> <p>20 me ask you some other questions. We'll come back to</p> <p>21 this document.</p> <p>22 You know Ken Quirk; right?</p> <p>23 A. Yes, I do.</p> <p>24 Q. And who's Mr. Quirk?</p> <p>25 A. A former sergeant.</p>

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<p>1 Q. With the Storey County Sheriff's Department?</p> <p>2 A. Correct.</p> <p>3 Q. Was he your boss at one point?</p> <p>4 A. Yes, he was.</p> <p>5 Q. He's -- he was a friend of Mr. Antinoro's as</p> <p>6 well; right?</p> <p>7 A. Correct.</p> <p>8 Q. In fact, Mr. Quirk, I believe, was responsible</p> <p>9 for getting Mr. Antinoro into the Storey County</p> <p>10 Sheriff's Office; right?</p> <p>11 A. I believe so, yes.</p> <p>12 Q. Mr. Quirk is no longer with Storey County</p> <p>13 Sheriff's Department; correct?</p> <p>14 A. Correct.</p> <p>15 Q. I think he now lives in Wendover on the Utah</p> <p>16 side?</p> <p>17 A. He's the chief of police, I believe, in West</p> <p>18 Wendover, Utah.</p> <p>19 Q. Are you aware that Mr. Quirk has given testimony</p> <p>20 in this action?</p> <p>21 A. No, I'm not.</p> <p>22 Q. I will represent to you that Mr. Quirk said that</p> <p>23 there was a general environment of sexual talk</p> <p>24 permeating the entire sheriff's department. Would you</p> <p>25 agree or disagree with Mr. Quirk's statement in that</p>	<p>1 didn't like the way that Mr. Antinoro would talk in</p> <p>2 front of her?</p> <p>3 A. I don't believe those were my, were my exact</p> <p>4 words.</p> <p>5 Q. Well, don't let me put words in your mouth. What</p> <p>6 did you say in that regard?</p> <p>7 A. I believe at the time Ms. Keener was like a</p> <p>8 little sister to me, and I treated her as such.</p> <p>9 Q. And you didn't like the talk that Mr. Antinoro</p> <p>10 was engaging in in front of her.</p> <p>11 A. I wouldn't just say -- I wouldn't say that</p> <p>12 totally, no.</p> <p>13 Q. What would you say, then?</p> <p>14 A. I believe there was times where there was talks</p> <p>15 amongst the three of us, or others, as a friend type</p> <p>16 stuff. Things, you know.</p> <p>17 Q. Well, give me some examples. "Things", with all</p> <p>18 due respect, "things" mean nothing on the transcript --</p> <p>19 A. Okay.</p> <p>20 Q. -- unless you give me facts.</p> <p>21 A. There was different talks, escapades, prior.</p> <p>22 Q. Of a sexual nature?</p> <p>23 A. That involved a sexual nature.</p> <p>24 Q. What were some of these escapades that you're</p> <p>25 referring to?</p>
Page 62	Page 64
<p>1 regard, assuming that that's what he said?</p> <p>2 A. Well, I believe there was talk, but I wouldn't</p> <p>3 say permeated.</p> <p>4 Q. There was a lot of inappropriate sexual talk</p> <p>5 going on -- there was a culture. Would that be a way of</p> <p>6 putting it?</p> <p>7 A. I wouldn't say a culture, no.</p> <p>8 Q. But it was occurring; right?</p> <p>9 A. I would say there was talk occurring, yes.</p> <p>10 Q. And it was occurring in front of Ms., in front of</p> <p>11 Ms. Keener; is that a correct statement?</p> <p>12 A. There was talk involved, correct.</p> <p>13 Q. Sexual talk.</p> <p>14 A. Involving all parties, yes.</p> <p>15 Q. Okay. And there was -- you're saying "involving</p> <p>16 all parties." Was it -- was sexual talk taking place</p> <p>17 while Ms. Keener was present?</p> <p>18 A. Yes. Like I said, there was.</p> <p>19 Q. All right. Who was engaging, from the male side,</p> <p>20 who was engaging in this type of talk?</p> <p>21 A. I believe there was a whole host of people at any</p> <p>22 given time.</p> <p>23 Q. Mr. Antinoro being one of them; correct?</p> <p>24 A. He was involved, yes.</p> <p>25 Q. Did you ever come up to Ms. Keener and say you</p>	<p>1 A. Off the top of my head, I can't -- I just recall</p> <p>2 there was talk, banter.</p> <p>3 Q. And this is talk that involved Mr. Antinoro;</p> <p>4 right?</p> <p>5 A. Involved everyone.</p> <p>6 Q. Okay. Mr. Antinoro, when he was involved in this</p> <p>7 banter of a sexual nature, was he the sheriff?</p> <p>8 A. He was.</p> <p>9 Q. Let's look at the Exhibit No. 2. I didn't mean</p> <p>10 to digress, but the thought hit me at the time. Down</p> <p>11 there on the bottom it says:</p> <p>12 "After the election, I was promoted permanently</p> <p>13 to the chief deputy position," and then in parens it</p> <p>14 says "January 12th, 2015." It says: "In</p> <p>15 April/March/June time frame, Antinoro's long-term</p> <p>16 girlfriend ended their relationship. Sergeant Tony</p> <p>17 Dosen is close friends with Antinoro and his also the</p> <p>18 fiancé to a childhood friend of mine, Misty."</p> <p>19 Okay. First of all, we've already established</p> <p>20 that you were close friends with Mr. Antinoro; is that a</p> <p>21 correct statement?</p> <p>22 A. Correct.</p> <p>23 Q. Were you also the fiancé of Misty?</p> <p>24 A. At the time, yes.</p> <p>25 Q. Okay.</p>

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<p>1 "Misty had been very good friends with Antinoro's 2 girlfriend, Adrianna." 3 Is that a true statement? 4 A. They were good friends, yes. 5 Q. "Misty had told me about Antinoro making sexual 6 passes at her and that he had tried to get her and 7 Adrianna to have a sexual encounter." 8 Did that occur? 9 A. A sexual encounter? No. 10 Q. Did, did it occur where Mr. Antinoro was trying 11 to get Adrianna and Misty to have a sexual encounter? 12 A. I don't believe so, no. 13 Q. Did Misty Say anything about that? 14 A. About trying to get into a sexual encounter? 15 Q. That Mr. Antinoro was trying to get her and 16 Adrianna to have a sexual encounter. 17 A. No. 18 Q. Would Misty lie about something like that? 19 A. It may have been taken out of context. I don't 20 believe she would lie about it. 21 Q. I'm trying to figure out how it could be taken 22 out of context that somebody was trying to have another 23 person have a sexual encounter with them. 24 A. I don't know if those were the exact words and 25 verbiage used.</p>	<p>1 Q. And that's because you weren't married? 2 A. Correct. 3 Q. Now, second paragraph says: 4 "When Adrianna left Antinoro" -- let me rephrase 5 again. It says, second paragraph says: 6 "When Adrianna left Antinoro, Misty had informed 7 me that Adrianna was angry with Antinoro because he 8 allowed her to be gang raped by a group of guys that he 9 set up." 10 Misty ever tell you this? 11 A. I had heard it, but I don't believe that it 12 actually happened. 13 Q. Where did you hear this from? 14 A. From Misty. 15 Q. Okay. Misty was your fiancée at the time? 16 A. Correct. 17 Q. Did you ever have any type of investigation 18 instigated to determine whether or not Mr. Antinoro had 19 allowed Adrianna to be gang raped by a group of guys 20 that he set up? 21 A. Did I have an investigation? 22 Q. Yes. 23 A. No, I did not. 24 Q. Was Mr. Antinoro the sheriff at this time? 25 A. I believe so.</p>
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<p>1 Q. So you don't know one way or another whether 2 that's a true -- that that actually occurred, where Mr. 3 Antinoro was trying to encourage Misty to engage in a 4 sexual encounter with Adrianna? 5 A. When I was around, I never heard that statement. 6 Q. You never had heard Mr. Antinoro say something to 7 that effect? 8 A. Involving Misty and Adrianna, no. 9 Q. Did you and Misty engage in threesomes? 10 A. We have. 11 Q. Was Misty an employee of the county? 12 A. No, she was not. 13 Q. Was she an employee of the sheriff's office? 14 A. No, she was not. 15 Q. Has she ever been an employee of the county or 16 the sheriff's office? 17 A. No, she has not. 18 Q. Now, Ms. Keener's statement at the bottom, the 19 last full sentence, she says: 20 "I was surprised at this however; knew that Dosen 21 had been involved with swinging and spouse swapping 22 based on his own admissions." 23 Is that true, that you were involved in swinging 24 and spouse swapping? 25 A. In swinging. Not spouse swapping.</p>	<p>1 Q. Then it says: 2 "Evidently, Antinoro would post Craig's List 3 ads and he would follow Adrianna to a hotel room while 4 he watched her have sex with men, sometimes multiple 5 men." 6 Did Mr. Antinoro post Craigslist ads for such 7 activities? 8 A. I believe so. I can't honestly say. 9 Q. You heard him talk about it, though? 10 A. I believe it was mentioned. 11 Q. Then it says: 12 "Antinoro got to the point where he would quit 13 going to the hotel rooms and would have Adrianna call 14 him and then leave the line open so he could hear her 15 having sex with other men." 16 Did Mr. Antinoro engage in that type of activity? 17 A. I can't honestly say. I believe so. 18 Q. You heard it from him that he would do that? 19 A. I don't know if to that extent, but I believe he 20 engaged in that stuff. 21 Q. Based on what he told you? 22 A. Correct. 23 Q. And this was along the line of questioning I 24 think I talked to you a little while ago. It says: 25 "Antinoro was a mess after she left. He ended up</p>

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<p>1 getting counseling however; for a period of about two 2 months he was non-functional." 3 Is that a true statement about Mr. Antinoro? 4 A. I don't know if you can say he was 5 non-functional. 6 Q. What would you say for those two months? 7 A. He was distraught. He was upset about the 8 break-up. 9 Q. Was he coming to work? 10 A. I believe sporadically, here and there. 11 Q. Did he take vacation? 12 A. I don't believe he has to take vacation. 13 Q. Did he take sick leave? 14 A. I don't believe he has to take sick leave. 15 Q. So he can just not show up to work? 16 A. I believe per NRS it states the sheriff has to be 17 in office the day he's sworn in and the day he's out of 18 the office. 19 Q. You may be right. Then it says: 20 "Dosen and I went to his residence to have 21 paperwork signed at one point and he was on the couch, 22 medicated, and in and out of awake state." 23 Is that a true statement? Did that occur? 24 A. We went to his house, yes. 25 Q. Okay. I know you went to his residence, but did</p>	<p>1 Q. "I learned from Dosen that Adrianna thought he 2 was suicidal therefore." 3 Did Adrianna tell you that, that Mr. Antinoro was 4 suicidal? 5 A. I don't believe -- I believe she said that she 6 was concerned of his state. I don't recall the suicidal 7 thoughts. 8 Q. What do you recall about his state? 9 A. I just believe she said she was -- he was upset 10 over their break-up, and since she didn't want to 11 interfere, she just wanted him checked on. 12 Q. Then it goes on to say: 13 "Dosen went to Antinoro's house and retrieved his 14 firearms." 15 Is that a correct statement? 16 A. I don't recall getting a firearm. I may have. 17 Q. Okay. 18 A. And I believe you already stated in the first 19 deposition that I did. 20 Q. Do you want to read your deposition testimony in 21 that regard? 22 A. No. I'll, I'll take your word for it. Like I 23 said, I may have. I can't recall. 24 Q. You can't recall whether you made that statement 25 in your first deposition, or you can't recall whether</p>
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<p>1 you go there to have paperwork signed? 2 A. I -- we were there several times. I don't -- I'm 3 sure there was paperwork that needed to be signed. 4 Q. Was he on the couch medicated and in and out of 5 awake state? 6 A. He had taken sleeping medication. 7 Q. So then what Ms. Keener is saying here is true. 8 A. To an extent, yes. 9 Q. "He was slurring his words and barely coherent." 10 Is that a true statement? 11 A. I don't recall as to what his state was, I just 12 recall that he was not sleeping, or having problems 13 sleeping. 14 Q. Do you recall whether he was slurring his words 15 and barely coherent? 16 A. I don't recall the slurring of the words or -- he 17 wasn't his normal self. 18 Q. Okay. 19 "It was heartbreaking to see what he was in a 20 state of, practically drooling on himself." 21 Is that a true statement? 22 A. I don't recall the drooling, like I stated. 23 Q. It's possible he was drooling on himself and you 24 didn't notice? 25 A. That could have happened.</p>	<p>1 you may have gone and gotten his firearms? 2 A. I don't -- not firearms. I believe it was one, 3 if we got one. 4 Q. And it says: 5 "It was difficult at the agency to keep lying for 6 him as people would ask where he was and I would say he 7 was in meetings or had the flu. I had to lie to 8 employees as well." 9 Did you guys have to do that? 10 A. I believe people asked, but like I said, he was 11 dealing with a break-up. 12 Q. Did you ever hear Mr. Antinoro refer to an 13 African American deputy sheriff as his little black boy? 14 A. I believe I heard mention of that. I don't know 15 if it came from him directly. 16 Q. Where would you have heard it if you didn't hear 17 it from him directly? 18 A. I believe I heard it from the then-chief deputy 19 Keener. 20 Q. Did you ever hear Mr. Antinoro use the word 21 "nigger" to refer to African-Americans? 22 A. I can't honestly say. There may have been 23 mention. 24 Q. I will represent to you that Mr. Mendoza 25 testified earlier today that he had heard Mr. Mendoza --</p>

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<p>1 excuse me -- Mr. Antinoro using the word "nigger" to 2 refer to African-Americans. So have you -- 3 A. In a general conversation, I don't know. 4 Q. You don't know. But you've heard him say it, 5 though; right? 6 A. I believe he may have mentioned. 7 MR. FLANGAS: Let's take a quick break here. 8 MR. RANDS: Sure. 9 (A short break was taken at this time.) 10 MR. FLANGAS: Back on the record. 11 BY MR. FLANGAS: 12 Q. Mr. Dosen, we just took a short break. Do you 13 understand you're still under oath? 14 A. Correct. 15 Q. Now, this lifestyle of Mr. Antinoro and yourself, 16 was Mr. Mendoza part of this lifestyle? 17 A. I can't honestly say. 18 Q. Did Mr. Antinoro ever tell you whether or not Mr. 19 Mendoza engaged in this type of lifestyle? 20 A. No, he did not. 21 Q. Did Mr. Mendoza ever tell you he engaged in that 22 type of lifestyle? 23 A. No, he did not. 24 Q. Did you ever hear of instances where Mr. Mendoza 25 was having sex with some of the folks out there in</p>	<p>1 Q. What did she do for the sheriff's office? 2 A. Administration. 3 Q. Did she ever make any allegations of sexual 4 harassment? 5 A. Not that I'm aware. 6 Q. Do you know a lady by the name of Allison Morgan? 7 A. I do. 8 Q. How do you know her? 9 A. She's a former reserve. 10 Q. Reserve deputy? 11 A. Yes. 12 Q. Now, Mr. Antinoro asked her out for -- to go out 13 with him; is that a correct statement? 14 A. I don't believe so. 15 Q. You don't believe he did? 16 A. I don't believe so. 17 Q. Did Mr. Antinoro ever tell you that he asked her 18 out? 19 A. She was friends with his girlfriend -- 20 ex-girlfriend at the time. 21 Q. Adrianna? 22 A. Correct. 23 Q. Did you have an affair with Allison Morgan? 24 A. Yes, I did. 25 Q. Okay. Now, Ms. Morgan was a reserve, and before</p>
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<p>1 Lockwood? 2 A. No, I did not. 3 Q. Did you ever hear of an accusation of such? 4 A. Not that I'm aware of, no, I did not. 5 Q. Was Mr. Mendoza aware of some of these things 6 that you and Mr. Antinoro were doing? 7 A. I'm not sure if he was or not. 8 Q. Would you guys, would you have told him about 9 that? 10 A. I don't believe I had any conversation with him 11 regarding that. 12 Q. Who is Sergeant Bowers? 13 A. He works for the sheriff's office. 14 Q. What does he do for the sheriff's office? 15 A. He's in patrol, in the patrol division. 16 Q. As a sergeant he's obviously a supervisor? 17 A. Correct. 18 Q. Is he still there? 19 A. Yes, he is. 20 Q. Who is Melissa Fields? 21 A. A former employee. 22 Q. What did Ms. Fields do for the -- first of all, 23 you said she's a former employee. Is that of the county 24 or the sheriff's department? 25 A. Sheriff's office.</p>	<p>1 she was a reserve she went to the academy; right? 2 A. Repeat that. 3 Q. Ms. Morgan was a reserve officer. 4 A. Correct. 5 Q. Prior to becoming a reserve officer, she had 6 attended one of the academies; is that a correct 7 statement? 8 A. I believe she -- yes. 9 Q. Did Mr. Antinoro ask her out while she was 10 attending the academy? 11 A. I don't believe so. 12 Q. Was Ms. Morgan laid off while she was attending 13 the academy? 14 A. I believe she was with a group of people that 15 were laid off at the time. 16 Q. All right. And so she had to become a reserve 17 officer because she was laid off; right? 18 A. To keep her POST standards, I believe she became 19 a reserve officer. 20 Q. And what's an FTO? 21 A. Field training officer. 22 Q. So after she got out of the academy to continue 23 her POST certification, or however you want to word it, 24 she had to ride with an FTO; right? 25 A. I believe they did.</p>

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<p>1 Q. And the FTO at the time was Anthony Francone?</p> <p>2 A. I can't honestly recall.</p> <p>3 Q. Is it true that there was a rumor going around</p> <p>4 that Anthony Francone and Allison Morgan were having an</p> <p>5 affair?</p> <p>6 A. I heard something. I don't know if it's true or</p> <p>7 not.</p> <p>8 Q. After that rumor was floating around, is it true</p> <p>9 that you went to Ms. Morgan and told her that there was</p> <p>10 a rumor of her having an affair with Mr. Francone and</p> <p>11 that he should no longer be her FTO?</p> <p>12 A. I don't recall that, no.</p> <p>13 Q. Did you become Ms. Morgan's FTO?</p> <p>14 A. I don't believe I did.</p> <p>15 Q. You don't believe, or is it possible that you</p> <p>16 were her FTO?</p> <p>17 A. I was an FTO. I don't believe I was -- I don't</p> <p>18 believe I was her dedicated FTO.</p> <p>19 Q. Is it true after she became -- or after --</p> <p>20 shortly -- I don't even know how to ask this question,</p> <p>21 here, if you deny that you were her FTO.</p> <p>22 But while she was doing her FTO training -- or</p> <p>23 training with an FTO, is that when you and her engaged</p> <p>24 in an affair?</p> <p>25 A. I don't know what, at what time it was.</p>	<p>1 A. That's not correct.</p> <p>2 Q. Did you -- are you aware that there was an</p> <p>3 investigation -- a possible investigation opened up to</p> <p>4 investigate the affair that you were having with Ms.</p> <p>5 Morgan?</p> <p>6 A. Yes, I was.</p> <p>7 Q. Okay. Who opened up this investigation?</p> <p>8 A. I believe Sheriff Miller.</p> <p>9 Q. Sheriff Miller did. Was there actually a formal</p> <p>10 investigation?</p> <p>11 A. No, I believe Sergeant Keener looked into it.</p> <p>12 Q. Then-Sergeant Keener?</p> <p>13 A. Correct.</p> <p>14 Q. Is it true that Mr. Antinoro was involved in this</p> <p>15 so-called investigation?</p> <p>16 A. He was the undersheriff.</p> <p>17 Q. Is it true that he was using this so-called</p> <p>18 investigation to find more information out about Ms.</p> <p>19 Morgan?</p> <p>20 A. I have no idea.</p> <p>21 Q. And you're denying that Mr. Antinoro asked Ms.</p> <p>22 Morgan out for dates; right?</p> <p>23 A. I'm not saying I'm denying, I'm saying I don't</p> <p>24 know.</p> <p>25 Q. You're saying you don't know. Did it turn out</p>
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<p>1 Q. Did there come a point in time that you were</p> <p>2 engaging in this affair with Ms. Morgan, that it, it</p> <p>3 came to light that you and she were having an affair?</p> <p>4 A. Yes, we had an affair.</p> <p>5 Q. Okay. Did it come to light that you were having</p> <p>6 an affair in the department?</p> <p>7 A. I can't honestly say.</p> <p>8 Q. Was it true that you and she were engaging in</p> <p>9 your affair while you were on shift duty?</p> <p>10 A. No, it was not.</p> <p>11 Q. So if Ms. Morgan is to testify to that, she would</p> <p>12 be testifying incorrectly?</p> <p>13 A. That's not what happened. Yes, it would.</p> <p>14 Q. Well, why don't you tell me what happened, then.</p> <p>15 A. I'm just saying that's not what happened.</p> <p>16 Q. All right. So you did not engage in sex with Ms.</p> <p>17 Morgan while you all were on duty?</p> <p>18 A. No, I did not.</p> <p>19 Q. Did you engage in sex with Ms. Morgan in your</p> <p>20 squad car?</p> <p>21 A. No, I did not.</p> <p>22 Q. Or in your official car?</p> <p>23 A. No, I did not.</p> <p>24 Q. So if she's testifying to that, you would say</p> <p>25 that that's not a correct thing?</p>	<p>1 that there actually was not a real investigation opened</p> <p>2 up about your affair with Ms. Morgan?</p> <p>3 A. A real investigation?</p> <p>4 Q. Yes.</p> <p>5 A. I -- like I said, the only part I'm aware of is</p> <p>6 then-Sergeant Keener conducting the interview, or</p> <p>7 investigation.</p> <p>8 Q. Did Ms., did Ms. Keener interview you about the</p> <p>9 affair?</p> <p>10 A. I do not believe so.</p> <p>11 Q. Did she interview Ms. Morgan about this affair?</p> <p>12 A. I believe she did.</p> <p>13 Q. Did Ms. Morgan confirm the affair with Ms.</p> <p>14 Keener?</p> <p>15 A. I believe she did.</p> <p>16 Q. Did anything else happen during -- on this</p> <p>17 investigation to either you or Ms. Morgan?</p> <p>18 A. I was told by Sheriff Miller if there was an</p> <p>19 affair to make sure it stayed out of the workplace and</p> <p>20 didn't go any further.</p> <p>21 Q. This affair that you were having with Ms. Morgan,</p> <p>22 would -- and again, if she said you were doing this on</p> <p>23 shift, that would be incorrect?</p> <p>24 A. That's correct.</p> <p>25 Q. If she said you were doing it in the office and</p>

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<p>1 in the -- and/or the car, the official sheriff's car, 2 sheriff's office car, that she would be mistaken? 3 A. That's correct. 4 Q. Did she ever -- did you ever ask her to sign your 5 sex slave contract? 6 A. I don't believe so. 7 Q. Do you have such a contract? 8 A. No, I do not. 9 Q. Did you used to use such a contract? 10 A. No, I did not. 11 Q. Is it true that you tried to get Ms. Morgan to 12 have sex with a dog? 13 A. No, it's not. 14 Q. Is it true that you tried to get her to have sex 15 with a horse? 16 A. No, it's not. 17 Q. Is it true that you wanted her to swap -- get 18 into a situation where you could swap with Mr. Antinoro 19 and Adrianna so that you could have sex with Adrianna? 20 A. No, it's not. 21 Q. Did she tell you that to swap with Mr. Antinoro 22 would be uncomfortable because he was a supervisor over 23 you guys? 24 A. That, I don't believe that conversation ever came 25 up.</p>	<p>1 that a -- she was going to be rehired after she was laid 2 off? 3 A. I believe there was talk of people getting their 4 jobs back when the funding became available. 5 Q. How about Ms. Morgan specifically? 6 A. I do not recall. 7 Q. If Ms. Morgan was to say that she spurned Mr. 8 Antinoro's advances on her and subsequently was never 9 rehired, would she be not telling the truth or would she 10 be truthful? 11 MR. RANDS: Objection, calls for 12 speculation. You can answer. 13 THE WITNESS: Like I stated earlier, I don't 14 believe there was -- I don't recall any situations where 15 the two of them were to get together. 16 BY MR. FLANGAS: 17 Q. Did you ever contact Ms. Morgan in and around, 18 let's say, November of 2013, and tell her that Storey 19 County was hiring again? 20 A. I may have. I don't know. 21 MR. FLANGAS: May we have this marked as No. 22 3, please. 23 (Exhibit 3 marked at this time.) 24 BY MR. FLANGAS: 25 Q. I'm showing you what's marked as MK 54, and it</p>
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<p>1 Q. Did you ever tell her not to worry about it 2 because you and Mr. Antinoro had swapped before? 3 A. No, I did not. 4 Q. Did you ever ask Ms. Morgan to engage in, in 5 using what's called a glory hole? 6 A. No, I did not. 7 Q. Do you know what a glory hole is? 8 A. Yes, I do. 9 Q. What is a glory hole? 10 A. A hole in a wall. 11 Q. And that's where a male will stick his member in 12 the hole and hope for the best on the other side -- 13 A. Correct. 14 Q. -- with a female; right? Yes? 15 A. That's different scenarios, yes. 16 Q. What are the other scenarios? 17 A. Engaging in intercourse. 18 Q. Is it true that you wanted Ms. Morgan to be 19 blindfolded and watch her while a bunch of guys had sex 20 with her? 21 A. No, it is not. 22 Q. Did you tell her that you and Mr. Antinoro did 23 that many times? 24 A. No, I did not. 25 Q. Now, was it represented to Ms. Morgan that a,</p>	<p>1 goes all the way to MK 72. Would you please verify all 2 those pages are there. 3 A. Yes, sir. 4 Q. Okay. Do you recognize the text -- I will 5 represent to you this is screenshots of text messages 6 between yourself and Ms. Morgan. Do you recognize this 7 as such? 8 A. No, I do not. 9 Q. All right. Let's look what it says. It begins 10 on -- let's start on MK 54. It says on November 12th, 11 2013, at 12:48 p.m. Am I reading that correctly? 12 A. Yes. 13 Q. So it says: 14 "So I heard Storey County is hiring again." 15 I will represent to you that that is a statement 16 of Allison Morgan. 17 A. Okay. 18 Q. A response is: 19 "Yup. You interested?" 20 Is that you making that response? 21 A. I guess so. 22 Q. Then she responds: 23 "I thought about it again but I am not sure that 24 I wouldn't be railroaded out of there by certain people 25 again. LOL."</p>

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<p>1 And just for the record, that goes on to MK 55.</p> <p>2 A. Okay.</p> <p>3 Q. Did I read that correctly?</p> <p>4 A. Yes, you did.</p> <p>5 Q. And she -- so she wrote you:</p> <p>6 "I thought about it again but I'm not sure that I</p> <p>7 wouldn't be railroaded out of there by certain people</p> <p>8 again."</p> <p>9 Is that what it says?</p> <p>10 A. That's what it says.</p> <p>11 Q. What did she mean by she wasn't sure that she</p> <p>12 wouldn't be railroaded out of there again?</p> <p>13 MR. RANDS: Objection, calls for</p> <p>14 speculation.</p> <p>15 THE WITNESS: I have no idea.</p> <p>16 BY MR. FLANGAS:</p> <p>17 Q. Now, you're engaging in this conversation; right?</p> <p>18 A. I guess so.</p> <p>19 Q. All right. When I said "conversation," I mean</p> <p>20 this text conversation. Did you understand that?</p> <p>21 A. Yes, I did.</p> <p>22 Q. And you write:</p> <p>23 "Who? How are you?"</p> <p>24 And then she responds:</p> <p>25 "Ken for one. And for two, possibly the sheriff."</p>	<p>1 speculation.</p> <p>2 THE WITNESS: She could have been talking</p> <p>3 about Sergeant Quirk.</p> <p>4 BY MR. FLANGAS:</p> <p>5 Q. I think it says: "Ken for one. And for two,</p> <p>6 possibly the sheriff."</p> <p>7 A. Okay.</p> <p>8 Q. So why would she be mentioning the sheriff?</p> <p>9 A. I have no idea.</p> <p>10 MR. RANDS: Same objection.</p> <p>11 BY MR. FLANGAS:</p> <p>12 Q. I think this -- it goes:</p> <p>13 "I think once they did their formal investigation</p> <p>14 about me and you might have gotten jealous because I</p> <p>15 told him no and went ahead and had an affair with you."</p> <p>16 What formal investigation is she referring to</p> <p>17 there?</p> <p>18 A. I have no idea.</p> <p>19 Q. Is that the investigation of you and her having</p> <p>20 an affair?</p> <p>21 A. I have no idea.</p> <p>22 MR. RANDS: Same objection.</p> <p>23 BY MR. FLANGAS:</p> <p>24 Q. Then she says:</p> <p>25 "I'm doing good. Same ol same ol. I'm looking</p>
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<p>1 I think once they did their formal investigation about</p> <p>2 me and you might have gotten jealous because I told</p> <p>3 him" -- let me rephrase that. I read that improperly.</p> <p>4 So you go: "Who? How are you?"</p> <p>5 And at the bottom of MK 55 we've got a little bit</p> <p>6 better look at the screen, here, so I'll just read it</p> <p>7 from there. It says -- and she responds:</p> <p>8 "Ken for one. And for two, possibly the sheriff.</p> <p>9 I think once they did their formal investigation about</p> <p>10 me and you he might have gotten jealous because I told</p> <p>11 him no and went ahead and had an affair with you."</p> <p>12 Is she talking about telling the sheriff no</p> <p>13 there?</p> <p>14 A. I have --</p> <p>15 MR. RANDS: Objection, calls for</p> <p>16 speculation.</p> <p>17 THE WITNESS: I have no idea.</p> <p>18 BY MR. FLANGAS:</p> <p>19 Q. You've had conversations with her about the</p> <p>20 sheriff asking her out; right?</p> <p>21 A. No, I don't recall.</p> <p>22 Q. So who else would she be referring to that "he</p> <p>23 might have gotten jealous because I told him no and went</p> <p>24 ahead and had an affair with you"?</p> <p>25 MR. RANDS: Objection, calls for</p>	<p>1 to try and do something more with my career. I finish</p> <p>2 my bachelor's degree last year."</p> <p>3 And I know the grammar sounds bad, and I'm</p> <p>4 reading it correctly as it's stated.</p> <p>5 And then you write:</p> <p>6 "I'm better than him. You married yet?"</p> <p>7 Who are you referring to that you're better than</p> <p>8 him?</p> <p>9 A. I have no idea, because it goes from I finished</p> <p>10 my bachelor's degree last year.</p> <p>11 Q. Could it be that some of these text messages were</p> <p>12 in transit, so --</p> <p>13 A. I have no idea.</p> <p>14 MR. RANDS: Objection, calls for</p> <p>15 speculation.</p> <p>16 BY MR. FLANGAS:</p> <p>17 Q. Well, you wrote that, so you obviously had</p> <p>18 something in mind when you said "I'm better than him."</p> <p>19 A. I also wrote it five years ago.</p> <p>20 Q. That's correct. So you don't know who you're</p> <p>21 referring to?</p> <p>22 A. At this point in time, no.</p> <p>23 Q. Were you referring to the sheriff?</p> <p>24 A. Like I just said, I don't know who I was</p> <p>25 referring to.</p>

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<p>1 Q. Let's hear what she responded to on the next 2 page, which is MK 57. 3 "LOL. No, I'm not married and I'm not dating 4 anybody still. I was seeing a guy for about a month and 5 things didn't work out. Too many red flags for me, 6 although he was a sweetheart." 7 And then it continues, and this is where you 8 write: 9 "Let me know when you want the FREAK." 10 What's "the freak"? 11 A. Probably getting together. 12 Q. In a sexual way? 13 A. Well, I would assume so. 14 Q. Well, I don't want you to assume. This is your 15 writing, as you've told us. 16 A. And once again, I wrote it five years go. 17 Q. All right. Well, you're reading this. You've 18 got to have a general idea of what "the freak" is; 19 right? 20 A. I'm assuming that's what it is. 21 Q. And she writes back: 22 "Who's the freak?" 23 And you respond: 24 "Me and you." 25 And she writes back:</p>	<p>1 MR. RANDS: Objection, calls for 2 speculation. 3 THE WITNESS: No, I did not have a 4 relationship with her on shift. 5 BY MR. FLANGAS: 6 Q. Then you write back: 7 "I guess you're just so fucking hot I can't 8 control myself." 9 Is that what it says? 10 A. That's what it says. 11 Q. You're not denying that something occurred on 12 shift, though, are you? 13 A. Nothing occurred on shift. 14 Q. Then she writes: 15 "Aren't you still with that girl in Fallon?" 16 Oh, I think you wrote that. Or maybe she did. 17 Let's see. I can't -- it looks like you wrote that. 18 "Aren't you still with that girl in Fallon?" 19 Did you write that? 20 A. I have no idea if I wrote it or not. 21 Q. And then she writes: 22 "Ha ha ha. Whatever." 23 And then you write: "I'm with everyone, a free 24 cock spirit." 25 A. Okay.</p>
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<p>1 "Oh. LOL. Well if I consider going back to 2 Storey County then that might cause issues again like it 3 did last time. So I don't know if that would be such a 4 good idea." 5 What issues were caused last time she was in 6 Storey County? 7 A. I do not recall. 8 Q. That would be your affair with her? 9 A. I do not recall. 10 Q. Then she writes: 11 "Oh. LOL" -- oops. That's the same one again, 12 because these are obviously running together. 13 Then you write back to her: 14 "Not if we worked together before or after work. 15 LOL." 16 Now, that's on MK 58. 17 A. Okay. 18 Q. What did you mean there when you said, "Not if we 19 worked together before or after work. LOL"? 20 A. Again, I wrote it five years ago, and I do not 21 know. 22 Q. And it says: 23 "Oh, you mean not on shift this time? LOL." 24 Is that implying you guys were having a 25 relationship while on shift?</p>	<p>1 Q. What were you, what were you telling her there? 2 A. I don't honestly know, five years ago. 3 Q. Then it says: 4 "LMFAO. Yeah, I remember that about you. So you 5 guys have pretty much an open relationship? That should 6 be an ideal situation for you." 7 A. Okay. 8 Q. And then you write: 9 "It is. She loves pussy as much as I do." 10 Correct? You wrote that? 11 A. That's what it says. 12 Q. Then it looks like she's writing: 13 "Last time I talked to you, you were asking me to 14 teach her something. You must have done that." 15 And then you write: 16 "You still can. She will eat you until you 17 scream." 18 You wrote that; right? 19 A. I guess so. 20 Q. And then she writes back: 21 "I don't think you will ever get someone to do 22 everything you want and what turns you on." 23 And then you write: 24 "She's my slave, does whatever she is told." 25 And she writes back:</p>

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<p>1 "LOL. So you got her to agree to sign your sex 2 slave contract? LMAO." 3 Is that what it says? 4 A. That's what it says. 5 Q. What is "LMAO"? 6 A. I believe that's laugh my ass off. 7 Q. Do you have -- did you have a sex slave contract? 8 A. No, I did not. 9 Q. So if Ms. Morgan is to testify that you have a 10 sex slave contract, that would be incorrect? 11 A. I don't ever recall a sex slave contract, that's 12 correct. 13 Q. Then you respond to her: 14 "Yes, I did, and you are next." 15 So you're telling her that you got your whatever 16 to sign your sex slave contract; right? 17 A. I believe it's talk. 18 Q. Just talk, huh? Then she says: 19 "LMAO. I wouldn't sign it then, so why would I 20 sign it now? I don't feel comfortable with somebody 21 having that much control over me. 22 "You're just so confident about that, aren't you? 23 LOL. 24 "Wouldn't that mean you are starting a sex slave 25 harem? LMAO. That is so you."</p>	<p>1 Q. What screwed her over at work at Storey County, 2 possibly? 3 A. I have no idea. 4 Q. The affair she had with you? 5 A. I have no idea. 6 Q. Then you write: 7 "Sounds good to me, freaky fun with no hang-ups. 8 I don't need someone in the jail with their shit 9 together...you." 10 You wrote that; right? 11 A. I wrote that? I don't know. 12 Q. You don't know if you wrote it? It looks like 13 it, according to the way it's set up on the screenshot 14 here, that you wrote it. 15 A. Okay. 16 Q. Did you write it or not? 17 A. If it's there I guess I must have. 18 Q. Then you write back: 19 "Oh, I believe it totally screwed me over there. 20 And I thought you had cat 3's in the jail now." 21 What are "cat 3's"? 22 A. POST distinction. Category 1 is a full-fledged 23 officer, Category 3 is jail. 24 Q. Then you write: 25 "I'm giving a compliment."</p>
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<p>1 So -- 2 A. That's what it says. 3 Q. So you're still saying you don't have a sex slave 4 contract? 5 A. I believe it was talk. I've never had a contract 6 with anybody. 7 Q. She says she's not comfortable with you having 8 that much control over her. Is this some type of 9 bondage or S & M thing, or something to that effect? 10 A. I believe so, yes. 11 Q. So you do engage in submissive sex? 12 A. I have in the past. 13 Q. Then you write: 14 "You loved me having control over you. I wrote 15 the book on being in control." 16 You wrote that; correct? 17 A. I believe I did. 18 Q. And she says: 19 "LOL. I think you're right. You just might 20 have." 21 And then she writes: 22 "The only thing I regret about that is I think it 23 screwed me over at work with Storey County." 24 She wrote that; right? 25 A. That's what it looks like.</p>	<p>1 Right? 2 A. That's what it says. 3 Q. And then you write: 4 "I do." 5 Correct? 6 A. That's what it says. 7 Q. Is that "I do" in response to "I believe it 8 totally screwed me over up there. And I thought you had 9 cat 3's in the jail now"? 10 A. I don't know what that meant. 11 Q. Then she writes: 12 "I know. Thank you for the compliment. Are you 13 guys taking laterals or do I have to do the whole stupid 14 testing process again?" 15 She wrote that? 16 A. That's what it looks like. 17 Q. What's a lateral? 18 A. Somebody coming from a different agency. 19 Q. Then she writes: 20 "Then I would work in the" -- what it looks like, 21 the "jail"? 22 A. Okay. 23 Q. And then you write back: 24 "Let me find out." 25 Right?</p>

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<p>1 A. That's what -- yeah. 2 Q. Then she writes: 3 "I honestly don't think I could pass the physical 4 part right now. LOL." 5 Then you write back: 6 "You could pass my physical." 7 "LMAO." 8 Or she responds: 9 "LMAO." 10 Right? 11 A. Okay. 12 Q. Is that correct? 13 A. That's what it says. 14 Q. Then she writes you: 15 "So when will you be able to find out if they are 16 taking laterals or will I have to do the physical test?" 17 You write back: 18 "Next couple of days. What are you willing to do 19 for the info? LMFAO." 20 A. Okay. 21 Q. You wrote that; right? 22 A. I guess so. 23 Q. Are you making something conditional here -- 24 A. No, I'm not. 25 Q. -- for her to get some type of job at Storey</p>	<p>1 Q. Is that correct, you wrote that? 2 A. That's what it says. 3 Q. I know that's what it says. Did you write it? 4 A. Well, I guess. That's what it says. 5 Q. Okay. And then it says: 6 "LOL. Shut up, Tony." 7 And then you write back again -- oh, I think 8 that's just a repeat. 9 And then she says: 10 "Oh, geez. Shut up." 11 And then you write: 12 "Is it making your panties soaked and running 13 down your thighs?" 14 Did you write that? 15 A. That's what it says. 16 Q. And it says: 17 "LOL." 18 Right? 19 A. Correct. 20 Q. Then it says -- and you're saying: 21 "Tell me, or am I going to keep bugging you?" 22 Is that what you wrote? 23 A. That's what it says. 24 Q. And she says: 25 "I'm trying to drive. You'll just have to deal</p>
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<p>1 County? 2 A. No, I'm not. 3 Q. Then she writes back: 4 "Ha ha ha. Always a dirty Tony." 5 Right? 6 A. Yup. 7 Q. And we're starting on MK 67 at the top. 8 "What you don't like." 9 And she writes: 10 "I never said that." 11 Is that correct? 12 A. That's what it says. 13 Q. And then it says: 14 "What yiu" -- I'm assuming that means you. So: 15 "What are you saying? Am I making your pussy 16 wet?" 17 Did you write that? 18 A. That's what it says. 19 Q. Now, at this time you were a sergeant; right? 20 A. I believe so. 21 Q. And it says: 22 "LOL. Shut up, Tony." 23 And then you write: 24 "Is it dripping wet?" 25 A. Okay.</p>	<p>1 with it. LOL." 2 Then you write: 3 "Tell me." 4 Right? 5 A. Okay. 6 Q. Then she says: 7 "No." 8 Correct? 9 A. That's what it says. 10 Q. Okay. I'm on MK 69. You write to her: 11 "Tell me how wet your pussy is." 12 And then you say -- or I think she responds: 13 "LOL. See? I have the control. No contract 14 here. LMAO." 15 So she's referring to the contract again; right? 16 A. That's what it says. 17 Q. And then your answer is: 18 "I do because your pussy is soaking wet." 19 A. Okay. 20 Q. And it's what you wrote; right? 21 A. That's what it says. 22 Q. And then she writes: 23 "No info." 24 Correct? 25 A. Correct.</p>

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<p>1 Q. And then she writes: 2 "So how could I work in the jail if you only have 3 cat 3's in there?" 4 She wrote that; correct? 5 A. Correct. 6 Q. And then you write her back in response: 7 "Tell me how wet your pussy is in detail and I 8 will give you the info." 9 And she writes -- well, you wrote that; right? 10 A. That's what it says. 11 Q. And she writes: 12 "Nope. LOL." 13 Correct? 14 A. That's what it says. 15 Q. And then you write: 16 "I know your pussy is gushing." 17 You wrote that, right? 18 A. That's what it says. 19 Q. And then she writes: 20 "LOL. Have a good day, Tony." 21 Right? 22 A. That's what it says. 23 Q. And then you write: 24 "Just admit it." 25 Correct?</p>	<p>1 A. Not that I'm aware. 2 Q. Other than what we've talked about here with Ms. 3 Keener, are you aware of any other sexual harassment 4 that may have occurred in the sheriff's office? 5 MR. RANDS: Objection, calls for a legal 6 conclusion. Go ahead. 7 THE WITNESS: You touched on Deputy Adrian 8 filing a complaint. 9 BY MR. FLANGAS: 10 Q. Anybody else? 11 A. Not that I'm aware. 12 Q. Has there ever been an expression of remorse on 13 the part of Mr. Antinoro about what happened to Ms. 14 Keener? 15 A. I believe she -- or he made an apology. 16 Q. To who? 17 A. I believe there was one written in the paper. 18 Q. A written apology by Mr. Antinoro to Ms. Keener? 19 A. I believe so. 20 Q. In the paper. 21 A. The Comstock Chronicle. 22 Q. Did he ever tell you that "I can't believe I did 23 that to Ms. Keener"? 24 A. I believe he stated he apologized. 25 Q. All he said was he apologized and it was in the</p>
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<p>1 A. That's what it says. 2 Q. And she says: 3 "Goodbye." 4 Is that a correct statement? 5 A. That's what it says. 6 Q. Do you know whether or not Ms. Morgan filed any 7 suits? 8 A. Not that I'm aware of. 9 Q. Are you aware that she filed a letter to the AG's 10 office? 11 A. Not that I'm aware of. 12 Q. Did you ever call her and tell her -- call her on 13 the phone -- scratch that. 14 She lives in Yerington now; right? 15 A. I have no idea. 16 Q. Did you ever call her on the phone to see how she 17 was doing and then ask to move in with her? 18 A. No, I don't recall that, no. 19 Q. Are aware of any discipline in the sheriff's 20 office for sexual harassment ever having been meted out? 21 A. Not that I'm aware of. 22 Q. Has there ever been any rumor of discipline for 23 sexual harassment in the sheriff's office? 24 A. Pertaining to? 25 Q. Any type of sexual harassment discipline.</p>	<p>1 paper; right? 2 A. I believe so. 3 Q. Do you know if he apologized to Ms. Keener in 4 person? 5 A. I am not aware. 6 Q. Did he ever say he wanted Ms. Keener back in the 7 sheriff's department? 8 A. He never said. 9 Q. Did Mr. Antinoro ever joke about Ms. Keener not 10 being there anymore? 11 A. No, I don't believe so. 12 Q. Did he ever joke about, "Wow. She complains 13 about me and she got moved out"? 14 A. I've never heard that. 15 Q. Have you heard that Ms. Keener, after she made 16 this complaint about Mr. Antinoro's behavior, that Ms. 17 Keener was removed from the sheriff's department, did 18 you ever hear that? 19 A. I don't -- no, I did not hear that complaint. 20 Q. Did you -- 21 A. I knew she was removed. 22 Q. She was removed. Who removed her? 23 A. I believe -- I saw her one day come in with HR, 24 Austin Osborne, and pack her stuff. 25 Q. And pack her stuff. So she makes a complaint</p>

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<p>1 about Mr. Antinoro, and you see her showing up with Mr. 2 Osborne to pack up her stuff; right? 3 A. At a point in time, yes. 4 Q. Okay. Now you're the chief deputy; right? 5 A. I am now. 6 Q. You are now. Been a -- you've been a sergeant 7 for quite a few years; right? 8 A. Correct. 9 Q. Supervisor; correct? 10 A. Correct. 11 Q. You know that you're responsible for enforcing 12 policies; right? 13 A. Yes. Everybody is. 14 Q. Okay. Does that seem right to you, that Ms. 15 Keener complains about Mr. Antinoro's behavior and the 16 next thing you know she's over there with Mr. Osborne 17 having her desk cleaned out? 18 MR. RANDS: Objection, calls for a legal 19 conclusion. 20 BY MR. FLANGAS: 21 Q. Does that seem right to you? 22 A. Well, I don't know everything that led up to it. 23 Q. All right. Let's just -- with those, that little 24 set of facts I gave you, she's complained about Mr. 25 Antinoro's improper behavior and a short time later</p>	<p>1 Q. Okay. You agree with me, then, in that juncture 2 you shouldn't punish the person who's being harassed; 3 right? 4 A. In that situation, yes. 5 Q. Okay. I want you to accept that same premise, 6 we've got Sheriff Antinoro, I want you to accept it as 7 true that he sexual harassed Ms. Keener. Are you with 8 me so far? 9 A. Okay. 10 Q. Ms. Keener complains to the appropriate folks at 11 the county, and instead of Mr. Antinoro getting 12 disciplined or removed, Ms. Keener gets removed. What's 13 the difference between the two scenarios? 14 MR. RANDS: Objection, calls for a legal 15 conclusion, calls for speculation. It's also a faulty 16 premise. Go ahead and answer it if you can. 17 THE WITNESS: Again, I was not made aware of 18 the reason for the removal. 19 BY MR. FLANGAS: 20 Q. So just -- again, I'm not asking you if you -- 21 A. Okay. 22 Q. -- are aware of the removal. I want you to 23 accept my facts as true. 24 A. Okay. 25 Q. Very simple. One --</p>
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<p>1 she's having her desk cleaned out with Mr. Osborne, does 2 that seem right to you? 3 MR. RANDS: Same objections. 4 THE WITNESS: Again, I don't know -- 5 BY MR. FLANGAS: 6 Q. Just based on those facts I just gave you, does 7 that seem right? 8 MR. RANDS: Same objection. 9 THE WITNESS: I don't know where the 10 reasoning or the outcome came for her to move. Or to 11 clean out her desk. 12 BY MR. FLANGAS: 13 Q. Let me ask you this: You got sergeants that work 14 for you; right? 15 A. Correct. 16 Q. Okay. If one of your sergeants was sexually 17 harassing one of the deputies and you found out about 18 it -- okay? Are you with me so far? 19 A. Correct. 20 Q. Would you discipline the sergeant, or would you 21 just take the deputy and remove the deputy from the 22 department? 23 A. If the sergeant was the one committing the 24 harassment, then obviously the sergeant would be dealt 25 with.</p>	<p>1 A. In that scenario, yes. 2 Q. Okay. Let's -- so we're clear on the record, 3 here, because we've gone a couple more sentences there. 4 MR. RANDS: And same objection. 5 MR. FLANGAS: Right. We'll have your 6 running objection. I appreciate that. Much better. 7 BY MR. FLANGAS: 8 Q. If you accept it as true that Mr. Antinoro 9 sexually harassed Ms. Keener -- 10 A. Correct. 11 Q. -- accept it as true that Ms. Keener complained 12 to the appropriate people in the, in the county. Are 13 you with me so far? 14 A. Correct. 15 Q. And if you accept it as true that a short time 16 later Ms. Keener is there with the HR officer having to 17 clean out her desk. 18 A. Correct. 19 Q. Those are the only facts you know -- 20 A. Correct. 21 Q. -- at this juncture. Is that appropriate, that 22 she should be removed under that fact scenario? 23 A. No, it's not. 24 Q. You, you wouldn't do that with your sergeant -- 25 you would have disciplined your sergeant as opposed to</p>

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<p>1 removing the deputy in a similar situation; right?</p> <p>2 A. In the scenario you just stated, yes.</p> <p>3 Q. Mr. Quirk is no longer with the sheriff's office</p> <p>4 in Storey County; is that correct?</p> <p>5 A. That's correct.</p> <p>6 Q. When did he leave?</p> <p>7 A. I don't know the exact time.</p> <p>8 Q. Why did he leave?</p> <p>9 A. I believe he was -- got a job as the chief in</p> <p>10 West Wendover, Utah.</p> <p>11 MR. RANDS: Technically, it would be</p> <p>12 Wendover, Utah. West Wendover is in Nevada.</p> <p>13 THE WITNESS: Or Wendover.</p> <p>14 MR. FLANGAS: Yes.</p> <p>15 BY MR. FLANGAS:</p> <p>16 Q. Did Mr. Antinoro ever have sex with anybody in</p> <p>17 Lockwood?</p> <p>18 A. Not that I'm aware of.</p> <p>19 Q. How about the Virginia City Highlands?</p> <p>20 A. Not that I'm aware of.</p> <p>21 Q. Did Mr. Antinoro ever date a working girl from,</p> <p>22 from the -- well, let me scratch that. Let me tell you</p> <p>23 what Mr., let me tell you what Mr. Quirk testified to.</p> <p>24 Mr. Quirk was friends with Mr. Antinoro; is that</p> <p>25 a correct statement?</p>	<p>1 A. Okay.</p> <p>2 Q. Do you, do you know the name of the sexual worker</p> <p>3 that Mr. Antinoro might have -- would have dated at --</p> <p>4 from the Mustang Ranch, as alleged by Mr. Quirk?</p> <p>5 A. No, I do not.</p> <p>6 Q. Did Mr. Antinoro date a sexual worker from the</p> <p>7 Mustang Ranch?</p> <p>8 A. Not that I'm aware of. I know Sergeant Quirk</p> <p>9 did.</p> <p>10 Q. Did Mr. Antinoro ever tell you that he had dated</p> <p>11 a sex worker from the Mustang Ranch?</p> <p>12 A. Not that I recall.</p> <p>13 Q. Would Mr. Quirk be lying about Mr. Antinoro</p> <p>14 dating a sexual worker from the Mustang Ranch?</p> <p>15 A. I have no idea. I can't answer that.</p> <p>16 Q. Would it be proper for the sheriff of Storey</p> <p>17 County to date a sex worker from the Mustang Ranch?</p> <p>18 MR. RANDS: Objection, calls for</p> <p>19 speculation, calls for a legal conclusion. Go ahead.</p> <p>20 THE WITNESS: I'm not the moral police. I</p> <p>21 can't answer that.</p> <p>22 BY MR. FLANGAS:</p> <p>23 Q. I'm not talking about morality, I'm talking about</p> <p>24 would it be proper for the sheriff of Storey County to</p> <p>25 date a sex worker from the Mustang Ranch.</p>
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<p>1 A. That's correct.</p> <p>2 Q. Okay. I'm going to just read for you -- for the</p> <p>3 record, I'm going to be reading from page 37 of Mr.</p> <p>4 Quirk's deposition, which was taken on Friday,</p> <p>5 February 9th, 2018.</p> <p>6 A. Okay.</p> <p>7 Q. Starting on line 19 of his deposition, on page</p> <p>8 37.</p> <p>9 The question, it says: "Do you know a lady by</p> <p>10 the name of April Enloe?"</p> <p>11 Answer: "I do."</p> <p>12 Whoops. I'm on the wrong page. I apologize.</p> <p>13 I'm going to be working on page 70, line seven of his</p> <p>14 deposition.</p> <p>15 The question I asked Mr. Quirk starts like this:</p> <p>16 "Did he ever date more than one lady from the</p> <p>17 Mustang Ranch?"</p> <p>18 Answer: "I don't know if he did or not."</p> <p>19 Question: "Did he ever tell you?"</p> <p>20 Answer: "He just told me about the one girl that</p> <p>21 he -- he was dating from there."</p> <p>22 Question: "Was she an administrative worker at</p> <p>23 the Mustang Ranch or was she a sexual worker?"</p> <p>24 Answer: "I think it was a sexual worker."</p> <p>25 Now, that's what Mr. Quirk testified to.</p>	<p>1 A. I can't answer that.</p> <p>2 Q. Is the sheriff charged with enforcing the</p> <p>3 ordinances that affect the, that affect the Mustang</p> <p>4 Ranch?</p> <p>5 A. The regulations, yes.</p> <p>6 Q. Okay. As a person who has to regulate the</p> <p>7 brothel in Storey County, under that auspice, would it</p> <p>8 be appropriate for a sheriff, who has to regulate the</p> <p>9 brothel, to be dating a sex worker?</p> <p>10 A. I guess not.</p> <p>11 Q. Now, I will represent to you that the name of the</p> <p>12 sex worker that Mr. Quirk was referring to was an</p> <p>13 ambulance driver as well as a sex worker, and her name</p> <p>14 was Victoria. Does that stir your memory at all?</p> <p>15 A. I've never heard the -- that name.</p> <p>16 Q. You've never heard of a gal by the name of</p> <p>17 Victoria that dated Mr. Antinoro?</p> <p>18 A. No, I have not.</p> <p>19 Q. Have you ever heard of a lady by the name of</p> <p>20 Shaniece that Mr. Antinoro dated?</p> <p>21 A. I've never heard that name.</p> <p>22 Q. Have you ever heard of a lady by the name of</p> <p>23 Amanda that Mr. Antinoro dated?</p> <p>24 A. I've never.</p> <p>25 Q. Mr. Antinoro ever tell you that he dated these</p>

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<p>1 ladies?</p> <p>2 A. I've never heard those names.</p> <p>3 Q. I will represent to you that those two ladies'</p> <p>4 names I gave you were workers from the Mustang Ranch.</p> <p>5 A. Okay.</p> <p>6 Q. So you've never heard of Mr. Antinoro dating any</p> <p>7 women from the Mustang Ranch; right?</p> <p>8 A. As stated previous, no, I have not.</p> <p>9 Q. Now, Mr. Antinoro going to a place like The Green</p> <p>10 Door in Las Vegas, is that appropriate behavior for a</p> <p>11 badged officer?</p> <p>12 MR. RANDS: I'm going to interpose my</p> <p>13 objection again and just restate that I'm going to have</p> <p>14 continuing objections to this line of questions.</p> <p>15 MR. FLANGAS: Certainly. Thank you.</p> <p>16 THE WITNESS: Again, I'm not the moral</p> <p>17 police, so I'm not -- I can't --</p> <p>18 BY MR. FLANGAS:</p> <p>19 Q. All right. Let's -- I'm not really talking about</p> <p>20 morality. I'm not here to talk about morality, I'm here</p> <p>21 to talk about law and facts. Let me ask you this.</p> <p>22 Let's give you a scenario. Let's say that Mr. Antinoro</p> <p>23 goes to The Green Door in Las Vegas; right? Are you</p> <p>24 with me so far?</p> <p>25 A. Correct.</p>	<p>1 A. I guess it could.</p> <p>2 Q. Threats?</p> <p>3 A. I guess it could.</p> <p>4 Q. Bribery?</p> <p>5 A. I guess it could.</p> <p>6 Q. Hush money being paid?</p> <p>7 A. I guess it could.</p> <p>8 Q. Getting squeezed, essentially?</p> <p>9 A. I guess it could.</p> <p>10 Q. All right. So now my question is: Taking the</p> <p>11 morality that you're kind of hung up on out of the</p> <p>12 equation, is that appropriate behavior for a badged</p> <p>13 officer to be engaging in, to go to The Green Door, as</p> <p>14 Mr. Antinoro has been doing?</p> <p>15 A. I can't speak for others' lifestyles.</p> <p>16 Q. It's not a matter of lifestyle. I'm asking you</p> <p>17 to look at it from the perspective of a law enforcement</p> <p>18 officer who's charged with enforcing the laws of Storey</p> <p>19 County to engage in a type of behavior where he could be</p> <p>20 exposed to blackmail or extortion, coercion, et cetera.</p> <p>21 A. I believe you could say that about a lot --</p> <p>22 anybody in law enforcement.</p> <p>23 Q. Roger. And one of the things that I asked you</p> <p>24 earlier in this deposition --</p> <p>25 A. I remember.</p>
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<p>1 Q. Okay. We now know The Green Door is a place to</p> <p>2 go down and swing and swap partners and engage in sex;</p> <p>3 right?</p> <p>4 A. Correct.</p> <p>5 Q. Let's say that Mr. Antinoro, while he's there at</p> <p>6 The Green Door, runs into a known criminal from Storey</p> <p>7 County. Are you with me so far?</p> <p>8 A. Correct.</p> <p>9 Q. The known criminal sees Mr. Antinoro in The Green</p> <p>10 Door engaging in inappropriate behavior -- or let's,</p> <p>11 let's not be, let's not be moral about that. But sees</p> <p>12 Mr. Antinoro engaging in behavior where he's swapping</p> <p>13 partners at The Green Door and engaging in sex on the</p> <p>14 premises. Are you with me so far?</p> <p>15 A. Correct.</p> <p>16 Q. Now we've got a criminal in Storey County who's</p> <p>17 seen the sheriff do these thing. Are you with me so</p> <p>18 far?</p> <p>19 A. Correct.</p> <p>20 Q. Would that type of scenario possibly open up Mr.</p> <p>21 Antinoro to blackmail?</p> <p>22 A. I guess. I guess it could.</p> <p>23 Q. Extortion?</p> <p>24 A. I guess it could.</p> <p>25 Q. Coercion?</p>	<p>1 Q. -- is -- you remember. I was asking that a law</p> <p>2 enforcement --</p> <p>3 A. Right.</p> <p>4 Q. -- officer should be above reproach; right?</p> <p>5 A. I recall, yes.</p> <p>6 Q. Both in their professional and in their personal</p> <p>7 life; right?</p> <p>8 A. I guess, yes.</p> <p>9 Q. All right. So the personal life is putting that</p> <p>10 officer in jeopardy.</p> <p>11 A. It could, yes.</p> <p>12 Q. It could put him in jeopardy.</p> <p>13 A. Yes.</p> <p>14 Q. All right. Because it could put him in jeopardy,</p> <p>15 it's not a good idea to engage in that type of behavior,</p> <p>16 would you agree with me there?</p> <p>17 A. Correct.</p> <p>18 Q. So it's probably not appropriate for Mr. Antinoro</p> <p>19 to be engaging in that type of behavior, going to The</p> <p>20 Green Door and engaging in swapping partners and sex on</p> <p>21 the premises. Would you agree with me?</p> <p>22 A. Correct. Those things could happen.</p> <p>23 MR. FLANGAS: Let's take a short break here.</p> <p>24 MR. RANDS: All right.</p> <p>25 (A short break was taken at this time.)</p>

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<p>1 MR. FLANGAS: Back on the record.</p> <p>2 BY MR. FLANGAS:</p> <p>3 Q. Mr. Dosen, we just took a short break. You</p> <p>4 understand you're still under oath?</p> <p>5 A. That's correct.</p> <p>6 Q. Before, before a -- let me scratch that.</p> <p>7 When you get somebody that's applying for a -- to</p> <p>8 become a deputy sheriff with the Storey County Sheriff's</p> <p>9 Office, is there a background check that's done?</p> <p>10 A. Yes, there is.</p> <p>11 Q. And that background check would probably include</p> <p>12 them putting together an application first; right?</p> <p>13 A. Correct.</p> <p>14 Q. Listing all their personal data, such things as</p> <p>15 their name, probably Social Security number and</p> <p>16 everything up and down the line; right?</p> <p>17 A. Correct.</p> <p>18 Q. Probably have to disclose misdemeanor convictions</p> <p>19 and, obviously, felonies.</p> <p>20 A. Correct.</p> <p>21 Q. And would have to disclose any arrest, I'm</p> <p>22 guessing, for a sheriff's deputy's position; right?</p> <p>23 A. Correct.</p> <p>24 Q. I'm assuming a felony would eliminate that person</p> <p>25 immediately.</p>	<p>1 Storey County, and the background investigation reveals</p> <p>2 the behaviors similar to Mr. Antinoro's behaviors that</p> <p>3 are alleged in the complaint. Would that disqualify</p> <p>4 that person as a candidate for the sheriff's department?</p> <p>5 A. I don't --</p> <p>6 MR. RANDS: Same continuing objection.</p> <p>7 THE WITNESS: I don't know if it would</p> <p>8 totally, you know, not allow them to apply.</p> <p>9 BY MR. FLANGAS:</p> <p>10 Q. It would most likely end their application</p> <p>11 process, would you agree?</p> <p>12 A. It depends on the background investigator and --</p> <p>13 Q. The background investigator finds out that he's</p> <p>14 engaging in going to The Green Door, doing all the</p> <p>15 things that are alleged in the complaint, has sexually</p> <p>16 harassed a woman, if all that came to light from the</p> <p>17 background investigation, that would probably eliminate</p> <p>18 that person as a candidate for becoming a deputy in</p> <p>19 Storey County; right?</p> <p>20 A. It would raise a red flag.</p> <p>21 Q. More than a red flag, it would probably raise red</p> <p>22 lights, flashing strobe lights, and fireworks that the</p> <p>23 guy's probably not -- or lady -- are not a good, a good</p> <p>24 fit for Storey County deputy. Would you agree?</p> <p>25 A. It could possibly be.</p>
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<p>1 A. Correct.</p> <p>2 Q. Because you can't carry a firearm, obviously.</p> <p>3 I'm imagining a domestic violence conviction would</p> <p>4 eliminate that candidate because by federal law they</p> <p>5 can't carry a firearm. Is that a correct statement?</p> <p>6 A. Correct.</p> <p>7 Q. And certain types of misdemeanors might, you</p> <p>8 know, non-domestic violence, or anything, maybe a DUI</p> <p>9 might disqualify that candidate; right?</p> <p>10 A. It has in the past.</p> <p>11 Q. All right. And so after that's done, I'm</p> <p>12 assuming they're fingerprinted.</p> <p>13 A. Correct.</p> <p>14 Q. And I'm assuming the fingerprints are scanned</p> <p>15 into the database.</p> <p>16 A. Correct.</p> <p>17 Q. And I'm assuming that there's an FBI check, a</p> <p>18 national FBI check done on them based on their</p> <p>19 fingerprints.</p> <p>20 A. Correct.</p> <p>21 Q. To see what kind of records they have, type of</p> <p>22 behaviors and things like that; right?</p> <p>23 A. Correct.</p> <p>24 Q. And let's assume that we got a deputy, a proposed</p> <p>25 deputy, so to speak, somebody that wants to be hired by</p>	<p>1 Q. Now, under that standard, if Sheriff Antinoro is</p> <p>2 to run for re-election, would you vote for him?</p> <p>3 A. Yes, I would.</p> <p>4 Q. You would vote for him even though that same type</p> <p>5 of behavior would eliminate him as a potential deputy</p> <p>6 sheriff, you would vote for him as the sheriff?</p> <p>7 A. At this current day and age, yes, I would.</p> <p>8 Q. Because he's your friend; right?</p> <p>9 A. Well, I know what he's capable of doing.</p> <p>10 Q. So if he's got a background similar, he has a</p> <p>11 background -- scratch that.</p> <p>12 We've got a, a proposed deputy who's got a</p> <p>13 similar background as Mr. Antinoro, who's going to be</p> <p>14 red flagged and probably not hired, and not even going</p> <p>15 to probably even -- his application process is going to</p> <p>16 terminate. With that said, you would still allow</p> <p>17 somebody to run the entire department that has similar,</p> <p>18 has a similar type of background?</p> <p>19 A. You're comparing apples to oranges.</p> <p>20 Q. Really? Earlier today you told me that as a</p> <p>21 supervisor -- you know, in your position as the deputy</p> <p>22 chief you're a supervisor; right?</p> <p>23 A. I'm talking about the situation you just gave me.</p> <p>24 Q. Well, going to come back to it. You're a</p> <p>25 supervisor; right?</p>

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<p>1 A. Correct.</p> <p>2 Q. You're a manager of the department.</p> <p>3 A. Correct.</p> <p>4 Q. You're leader of the department; right?</p> <p>5 A. Correct.</p> <p>6 Q. Same attributes should attach the Mr. Antinoro as</p> <p>7 sheriff; right?</p> <p>8 A. Correct.</p> <p>9 Q. As the manager of the department; right?</p> <p>10 A. Correct.</p> <p>11 Q. He's the leader of the department; right?</p> <p>12 A. Correct.</p> <p>13 Q. You told me as, you know, as a manager or leader</p> <p>14 of the department, a little while ago, you should lead</p> <p>15 by up front; right?</p> <p>16 A. Correct.</p> <p>17 Q. Lead by example, I think is what you told me.</p> <p>18 A. Correct.</p> <p>19 Q. Okay. So you're okay with this apples and</p> <p>20 oranges now, where it's do as I say not as I do type of</p> <p>21 situation?</p> <p>22 A. That's not what I'm saying.</p> <p>23 Q. All right. What are you saying?</p> <p>24 A. I'm saying as hiring, you're talking about an</p> <p>25 individual applying for a job that has little or no</p>	<p>1 Q. No other additional training?</p> <p>2 A. Not that I recall.</p> <p>3 Q. Was there any discussions of Ms. Keener's case at</p> <p>4 that class?</p> <p>5 A. Not in the class, I would say.</p> <p>6 Q. Was there any directives anywhere, from the</p> <p>7 county, from the sheriff, not to engage in sexual talk</p> <p>8 to a subordinate?</p> <p>9 A. In the class -- that's what the class reiterated,</p> <p>10 yes.</p> <p>11 Q. And that's the reiteration that's done, what,</p> <p>12 every two years?</p> <p>13 A. I believe every two years, correct.</p> <p>14 MR. FLANGAS: Okay. No further questions.</p> <p>15 MR. RANDS: I have no questions.</p> <p>16 MR. FLANGAS: Thank you, Mr. Dosen.</p> <p>17 (Deposition concluded at 3:39 p.m.)</p> <p>18 -oOo-</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>BONANZA REPORTING & VIDEOCONFERENCE CENTER (775) 786-7655</p>
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<p>1 experience, and I'm -- and then you're talking about the</p> <p>2 sheriff.</p> <p>3 Q. Well, shouldn't the sheriff, who has experience,</p> <p>4 know better than to put themselves in a situation where</p> <p>5 they might be blackmailed, extorted, coerced,</p> <p>6 threatened, bribed, squeezed?</p> <p>7 MR. RANDS: Objection, argumentative. He's</p> <p>8 already answered the question.</p> <p>9 BY MR. FLANGAS:</p> <p>10 Q. Go ahead and answer.</p> <p>11 A. Can you repeat that?</p> <p>12 Q. Shouldn't a sheriff know better, with all his</p> <p>13 experience, not to put himself in a situation where he</p> <p>14 might be blackmailed, extorted, coerced, threatened,</p> <p>15 bribed, squeezed?</p> <p>16 MR. RANDS: Same objection.</p> <p>17 THE WITNESS: I guess so.</p> <p>18 BY MR. FLANGAS:</p> <p>19 Q. After Ms. Keener left the Storey County Sheriff's</p> <p>20 Department, was there ever any type of increased</p> <p>21 training regarding sexual harassment?</p> <p>22 A. There was a class put on by the county POOL/PACT,</p> <p>23 yes, there was.</p> <p>24 Q. And that's just the annual class; right?</p> <p>25 A. I believe so, yes.</p>	<p>1 -oOo-</p> <p>2</p> <p>3 I, ANTHONY DOSEN, hereby declare under</p> <p>4 penalty of perjury that I have read the foregoing pages</p> <p>5 1 through 123; that any changes made herein were made</p> <p>6 and initialed by me; that I have hereunto affixed my</p> <p>7 signature.</p> <p>8</p> <p>9 Dated: _____</p> <p>10</p> <p>11</p> <p>12 _____</p> <p>13 ANTHONY DOSEN</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>BONANZA REPORTING & VIDEOCONFERENCE CENTER (775) 786-7655</p>

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<p>1 ERRATA SHEET/CORRECTIONS</p> <p>2</p> <p>3 PAGE LINE</p> <p>4 _____</p> <p>5 _____</p> <p>6 _____</p> <p>7 _____</p> <p>8 _____</p> <p>9 _____</p> <p>10 _____</p> <p>11 _____</p> <p>12 _____</p> <p>13 _____</p> <p>14 _____</p> <p>15 _____</p> <p>16 _____</p> <p>17 _____</p> <p>18 _____</p> <p>19 _____</p> <p>20 _____</p> <p>21 _____</p> <p>22 _____</p> <p>23 _____</p> <p>24 _____</p> <p>25 _____</p> <p>BONANZA REPORTING & VIDEOCONFERENCE CENTER (775) 786-7655</p>	<p>1 February 27, 2018</p> <p>2</p> <p>3 Douglas Rands, Esq.</p> <p>4 Rands, South & Gardner</p> <p>5 9498 Double R Boulevard, #A</p> <p>6 Reno, Nevada 895021</p> <p>7</p> <p>8 Re: Keener v. Gerald R. Antinoro, et al.</p> <p>9</p> <p>10 Dear Mr. Rands:</p> <p>11 Please find enclosed the original deposition transcript</p> <p>12 of Anthony Dosen taken in the above-entitled matter on</p> <p>13 February 14, 2018.</p> <p>14</p> <p>15 We have enclosed the transcript in order for your client</p> <p>16 to review.</p> <p>17</p> <p>18 Thank you for your prompt attention to this matter.</p> <p>19</p> <p>20</p> <p>21 Bonanza Reporting & Videoconference Center</p> <p>22</p> <p>23 cc: Deposition transcript</p> <p>24</p> <p>25</p> <p>BONANZA REPORTING & VIDEOCONFERENCE CENTER (775) 786-7655</p>
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<p>1 STATE OF NEVADA)</p> <p>2) ss.</p> <p>3 COUNTY OF WASHOE)</p> <p>4</p> <p>5 I, SUSAN E. BELINGHERI, a Certified Court</p> <p>6 Reporter for the State of Nevada, do hereby certify;</p> <p>7 That on Wednesday, the 14th day of February,</p> <p>8 2018, at the hour of 1:00 p.m. of said day, at the</p> <p>9 offices of Bonanza Reporting & Videoconference Center,</p> <p>10 1111 Forest Street, Reno, Nevada, personally appeared</p> <p>11 ANTHONY DOSEN, who was duly sworn by me, was thereupon</p> <p>12 was deposed in the matter entitled herein, and that</p> <p>13 before the proceeding's completion the reading and</p> <p>14 signing of the deposition has been requested by the</p> <p>15 deponent or party;</p> <p>16 That the foregoing transcript, consisting of</p> <p>17 pages 1 through 127, is a full, true, and correct</p> <p>18 transcript of my stenotype notes of said deposition to</p> <p>19 the best of my knowledge, skill, and ability.</p> <p>20 I further certify that I am not an attorney or</p> <p>21 counsel for any of the parties, nor a relative or</p> <p>22 employee of any attorney or counsel connected with the</p> <p>23 action, nor financially interested in the action.</p> <p>24 DATED: At Reno, Nevada, this 27th day of</p> <p>25 February, 2018.</p> <p>SUSAN E. BELINGHERI, CCR #655</p> <p>BONANZA REPORTING & VIDEOCONFERENCE CENTER (775) 786-7655</p>	