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September 15, 2025

Mark Tyner, Commission Administrator
VIA EMAIL ONLY
mtyner@grandcountyutah.net

with copy to:
Steve Hansen, Utah Local Governments Trust &
Jayme Blakesley, Outside Counsel
VIA EMAIL ONLY
steve@utahtrust.gov
jblakesley@hgblaw.net

Re. Notice of Claim pursuant to Utah Statute § 63G-7-401

Dear Mark,

I represent the following past and present County staff and officials:

Renee Baker
Lisa Ceniceros
Tara Collins
Trish Hedin
Cristin Hofhine
Tammy Howland
Machael Layton
Mary McGann
Mallory Nassau
Anna Sprout

On their behalf, I file this Notice of Claim pursuant to Part 4 of the Governmental Immunity Act of Utah. This Notice accompanies simultaneous discrimination complaints filed by the above-named staff and officials against Grand County with the Utah Antidiscrimination and Labor Division of the Utah Labor Commission.

Please note that I have not included County Attorney Stephen Stocks on this Notice because he supervises Cristin Hofhine. In addition, the investigation into the claims asserted herein may implicate Stocks given the duties of his office. For these reasons, it is appropriate that he recuses himself from this matter.

Please also note that I have spoken to or collected other evidence from 10 additional female County staff, officials, volunteers and contractors who have experienced similar harassment,

discrimination and retaliation; however, they have chosen not to participate in this process in an effort to protect their jobs or in fear of retaliation.

As detailed below, County elected officials, in particular officials Bill Winfield and Brian Martinez, have harassed and retaliated against women in the County by interfering with staff and departments, creating and fostering a hostile work environment, sexualizing and objectifying women's bodies, making inappropriate verbal comments, breaking the confidentiality of closed sessions, punishing women for speech, circumventing County Commission process, acting beyond the authority of the Grand County Commission, acting unilaterally, and violating the principles of ethical conduct for elected officials.

And County leadership, in particular the County Commission Administrator and Human Resources Director, have failed to protect these women from such action. Specifically, despite numerous complaints about the above-behavior, these women were either 1) ignored, with their complaints going unanswered and uninvestigated; or 2) told over and over again that there was nothing the Commission Administrator or HR Director could do since the offending parties are elected officials.

We understand that the County is finally conducting an investigation into the pervasive hostile work environment created by County leadership, but this occurred only after official Mary McGann took this matter public at the last meeting of the Grand County Commission, during a discussion about the Commission's controversial removal of a staff member, Cristin Hofhine, as Interim Zoning Administrator.

As is common, the discrimination, harassment, and retaliation that these women experience involve systemic issues, power dynamics, and subtle behaviors that have become normalized since Bill Winfield was elected. The toxicity can be difficult to identify through a single event. Instead of an isolated incident, this discrimination, harassment, and retaliation has manifested as a persistent pattern of behavior that creates a hostile work environment.

Examples of discrimination, harassment, and retaliation toward women within the County include, but are not limited to, the following actions:

1. Burdening female staff with menial additional work tasks unrelated to their primary job duties, and then embarrassing them in private and public meetings for not getting the additional work tasks completed;
2. Staring at breasts and nipples during conversations and meetings with female staff;
3. Attempting to manipulate female staff by pressuring their spouses to control their women;
4. Asking questions about female staff's plans to have children and start a family;
5. Removing or forcing out female staff (and volunteers and contractors) from critical positions despite support from within the County and the community for those staff;
6. Restructuring, underfunding, and undermining County departments and governing documents managed by female staff and officials without engaging female staff regarding such changes;

7. Unilaterally contacting Utah agencies for the purpose of withdrawing or re-diverting funding for County departments managed by female staff and officials;
8. Requesting discipline for female staff for how they communicate with commissioners;
9. Interfering with hiring decisions to undermine the promotion of female staff;
10. Manipulating or encouraging the submission of false complaints against female staff and officials (and volunteers and contractors) in an effort to undermine or remove them;
11. Fabricating or misrepresenting statements made by, or incidents involving, female staff and officials;
12. Requesting employee files or facilitating access to employee files, when they have no authority over such personnel matters or right to those records;
13. Leaking information from closed sessions or attorney-client privileged communications to third parties and the media;
14. Disregarding the Commission Policies and Procedures to direct female staff and take authority for work items from staff who object to the official's handling of an item;
15. Embarrassing female staff and officials (and volunteers and contractors) with abusive and belittling comments during private and public meetings;
16. Removing, or attempting to remove, female officials (and volunteers) from County boards and commissions, or undermining their roles on such boards and commissions;
17. Cutting off speech of female staff and officials (and volunteers and contractors) in private and public meetings;
18. Punishing and retaliating against female staff and officials (and volunteers and contractors) exercising their right to free speech and petition (in meetings, on social media, and via email); and
19. Retaliating against female staff and officials (and volunteers and contractors) for relationships with other female community leaders.

None of this is news to the Commission Administrator or HR Director. They have received numerous written and verbal complaints not just from County staff and officials about these behaviors, but also by County partner agencies made uncomfortable from these behaviors in private and public meetings. The County has not taken any action to protect these women despite 15 months of complaints. Not one single action.

The damage caused by the discrimination, harassment, and retaliation has taken many forms in the last 15+ months. Some women have been forced to resign from the County rather than face a persistent hostile workplace environment on a daily basis. Some women were removed inappropriately from their positions at the County. Some women are experiencing medical issues such as depression, anxiety, migraines, stomachaches, weight gain, and insomnia that require intervention, therapy, and FMLA leave. Some women no longer enjoy working for the County. Some women dread coming to work each day.

The actions by County elected officials and leadership are not just unethical, they are illegal. More than anything, my Clients want reform and respect. We demand an apology, training, education and a dramatic shift in culture. We also seek a true investigation of these matters, a determination of wrongdoing, and public censure of Bill Winfield and Brian Martinez (and any

other involved elected officials). For some of these women, damages in the form of lost wages and compensation for mental anguish are appropriate.

We look forward to your response.

Sincerely,



Christina R. Sloan, Esq.

Renee Baker

Renee Baker

Tara Collins

Tara Collins

Cristin Hofhine

Cristin Hofhine

Machael Layton

Machael Layton

Mallory Nassau

Mallory Nassau

Lisa Cenicerros

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Trisha Hedin

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Tammy Howland

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