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October 13, 2025

Bryan Pattison, Outside Counsel  
for Grand County, Utah  
VIA EMAIL ONLY  
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with copy to:  
Steve Hansen, Utah Local Governments Trust  
VIA EMAIL ONLY  
[steve@utahtrust.gov](mailto:steve@utahtrust.gov)

***Re. Amended and Restated Notice of Claim pursuant to Utah Statute § 63G-7-401***

Dear Bryan,

As you know, I represent the following prior and current officials, staff, volunteers and contractors of Grand County, Utah:

Renee Baker  
Lisa Cenicerros  
Tara Collins  
Trish Hedin  
Cristin Hofhine  
Tammy Howland  
Machael Layton  
Laura Long  
Mary McGann  
Mallory Nassau  
Anna Sprout  
Bryce Rogers  
Kristine Rogers

This amendment adds a 13<sup>th</sup> complainant; restates and expands the allegations set forth in my September 15 and 22 Notices; adds a claim of discrimination on the basis of sexual orientation and a claim under the Utah Protection of Public Employees Act; strengthens the discussion of malicious torts and legal argument; and attributes the allegations to particular, named officials.

As further explained in the Notices, it is the experience of the complainants that County officials Bill Winfield, Brian Martinez, and Stephen Stocks have created a hostile work environment due to discrimination on the basis of sex and sexual orientation, in contravention of Title VII of the Civil Rights Act of 1964, Section 1981 of Title 42 of United States Code, and the Utah

Antidiscrimination Act. *See Tademy*, 520 F.3d at 1170, 1172-1173 (the elements of a hostile work environment claim under § 1981 are the same as those under Title VII); *Darvish v. Labor Comm'n Appeals Bd.*, 273 P.3d 953, 958-959 (Utah App 2012) (Utah Antidiscrimination Act modeled after Title VII), *quoting Viktron/Lika v. Labor Comm'n*, 38 P.3d 993 (Utah App 2001) (in interpreting the Utah Antidiscrimination Act, the substantial body of federal case law interpreting Title VII is useful).

These officials have also violated the Utah Protection of Public Employees Act for terminating the contract of one complainant for whistleblower reporting activities to the Utah Attorney's General Office.

As a result of such discrimination, the complainants have experienced wrongful termination and demotion, constructive discharge, tortious interference with contracts, lost and unpaid wages, defamation, intentional infliction of emotional distress, and invasions of privacy.

As the number of complainants demonstrates, the harassment is so pervasive that it has created an intimidating and abusive work environment, in violation of state and federal law. *See e.g. Clark County School Board District v. Breedon*, 532 U.S. 268, 270 (U.S. 2001); *Harris v. Forklift Sys., Inc.* 510 U.S. 17, 21 (U.S. 1993); *Herrera v. Lufkin Indus., Inc.* 474 F.3d 675, 680 (10<sup>th</sup> Cir. 2007); *Ford v. West*, 222 F.3d 767, 775 (10<sup>th</sup> Cir. 2000).

As is often the case with discrimination based on sex and sexual orientation, County officials Bill Winfield, Brian Martinez, and Stephen Stocks have created a hostile work environment through a series of separate acts committed against numerous women that collectively constitute one unlawful employment practice. *See National Railroad Passenger Corp. v. Morgan*, 536 U.S. 101, 117 (U.S. 2002); *Cerros v. Steel Techs., Inc.*, 288 F.3d 1040, 1047 (7<sup>th</sup> Cir. 2002) (a sufficiently severe episode may occur as rarely as once, while a relentless pattern of lesser harassment that extends over a long period of time also violates the statute).

These separate acts, each a micro-aggression that communicates hostile, derogatory, and negative messages to female officials, staff, volunteers, and contractors, have occurred over days and months since January 2023. The harassment is sexist and homophobic, or stems from sexism and sexual prejudice. *See Witt v. Roadway Express*, 136 F.3d 1424, 1432 (10<sup>th</sup> Cir. 1998). The conduct has not only made the complainants physically and emotionally ill, but it has also unreasonably interfered with their work performance. The conduct has led, in many instances, to discipline, resignations, demotions, terminations, and FMLA leave for female staff and contractors. *See Harsco Corp v. Renner*, 475 P.3d 1179, 1187 (10<sup>th</sup> Cir. 2007).

The County has condoned or tolerated the creation of the hostile work environment because the Commission Administrator, County Attorney, and Human Resources Director knew about the harassment and failed to remedy it. *See Hollins v. Delta Airlines*, 238 F.3d 1255, 1258 (10<sup>th</sup> Cir. 2001); *Lockard v. Pizza Hut*, 162 F.3d 1062, 1073-74 (10<sup>th</sup> Cir. 1998).

These women (and others) have complained about their mistreatment in public meetings, private meetings, in formal HR complaints, in emails, and in informal reports for at least 15 months. *Adler v. Wal-Mart Stores*, 144 F.3d 664, 673-76 (10<sup>th</sup> Cir.1998) (knowledge demonstrated

where plaintiff has reported harassment to management-level employees). These women have complained over and over and over again. Commission Administrator Mark Tyner and HR Director Tess Barger would acknowledge the mistreatment but dismiss the complaints without investigation, remediation or taking other preventative action because Winfield, Martinez, and Stocks are elected officials.

The County's inaction is unreasonable, negligent, and wholly inadequate under law. By way of example only, the County failed to investigate the complaints, interfere in County meetings at the time mistreatment was occurring, seek independent legal counsel to advise them, censure or train the officials, or update the County's policies and procedures to protect the complainants from discriminatory conduct, harassment and intimidation. Such inaction is antithetical to Title VII and contributes to a hostile work environment. *See Tademy v. Union Pacific Corp.*, 520 F.3d 1149, 1166 (10<sup>th</sup> Cir. 2008); *Adler*, 144 F.3d at 676.

The reasonableness of the County's response to the various complaints is also undermined by its own response to this Notice of Claim. On or about September 24, 2025, the County issued a press release stating that it "categorically denies the allegations," and that it has not "received any internal complaints of unlawful harassment or discrimination under its reporting policies." In doing so, the County implies that it does not value its female employees or take discriminatory micro-aggressions seriously, which signals to County officials Winfield, Martinez, and Stocks that they can continue to engage in such illegal and unethical conduct against women in the County with minimal consequences. *See Id.* at 1167.

Specifically, during the tenure of County officials Winfield, Martinez, and Stocks, working for Grand County, Utah requires women to endure ridicule, insults, and retaliation, in the following ways:

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 (Winfield; Martinez; Stocks);
2. Staring at breasts and nipples during conversations and meetings with female staff (Martinez);
3. Making inappropriate sexual jokes and comments directed at female staff (Stocks);
4. Discussing and undermining female victims in pending or reported cases involving sexual assault with female staff not employed by the County Attorney's office (Stocks);
5. Commenting on women's appearance and style of dress, including derogatory comments about the appearance of gay female staff (Winfield);
6. Inviting subordinate female staff to private lunches, dinners, work trips, and personal vacations (Winfield; Stocks);
7. Providing gifts of wine and cheese and other items to female staff at work (Stocks);
8. Gossiping and spreading misinformation about the personal lives of female staff (Winfield; Stocks);
9. Attempting to manipulate female staff by pressuring their spouses and partners to control and silence their women (Winfield);

10. Asking questions or commenting about female staff's plans to have children and start a family (Male Supervisor; Stocks);
11. Asking questions or commenting about female staff's relationship status as single (Stocks);
12. Removing or forcing out female staff and contractors from critical positions despite support from within the County and the community for those staff (Winfield; Martinez; Stocks);
13. Removing, or attempting to remove, female officials (and volunteers) from County boards and commissions, or undermining their roles on such boards and commissions (Winfield; Martinez);
14. Restructuring, underfunding, and undermining County departments and governing documents managed by female staff and officials without engaging female staff regarding such changes (Winfield; Martinez);
15. Unilaterally contacting Utah agencies for the purpose of withdrawing or re-diverting funding for County departments managed by female staff and officials (Martinez);
16. Requesting discipline for female staff for how they communicate with commissioners and elected officials (Winfield; Martinez; Stocks);
17. Interfering with hiring decisions to undermine the promotion of female staff (Winfield; Stocks);
18. 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 (Winfield; Martinez; Stocks);
19. Fabricating or misrepresenting statements made by, or incidents involving, female staff and officials (Winfield; Martinez);
20. Requesting employee files or facilitating access to employee files, when they have no authority over such personnel matters or right to those records (Winfield; Martinez);
21. Leaking information from closed sessions or attorney-client privileged communications to third parties and the media (Stocks);
22. 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 (Winfield; Martinez);
23. Embarrassing female officials, staff, volunteers and contractors with abusive and belittling comments during private and public meetings (Winfield; Martinez);
24. Cutting off speech of female officials, staff, volunteers, and contractors in private and public meetings (Winfield; Martinez);
25. Punishing and retaliating against female officials, staff, volunteers, and contractors exercising their right to free speech and petition - in meetings, on social media, and via email (Winfield; Martinez; Stocks);
26. Using the media to damage the reputation of female officials, staff, volunteers, and contractors (Stocks);
27. Retaliating against female officials, staff, volunteers, and contractors for relationships with other female community leaders (Winfield; Martinez; Stocks);

28. Applying disparate ethical standards to the conduct of female County staff, officials, contractors, and volunteers versus their male counterparts (Winfield; Martinez);
29. Addressing female officials and staff informally while addressing male officials and staff formally by title or last name (Winfield);
30. Publicly disparaging female County officials, staff, contractors, and volunteers when male counterparts are given the opportunity for private questions and discussions (Winfield; Martinez);
31. Terminating contracts without cause of female contractors for professional disagreements with County officials (Winfield; Martinez; Stocks);
32. Threatening, via express or implied actions, to punish County officials, staff, contractors, and volunteers with baseless litigation for acting within the normal scope of their employment (Stocks);
33. Treating male and female County officials, staff, contractors, and volunteers differently in tone and manner of response, which behavior includes snickering and eye rolling while female official and staff are speaking, refusing to answer questions, or dismissing such questions with condescension, from female staff, officials, contractors, and volunteers (Winfield; Martinez);
34. Deferring to men in the room to answer technical questions instead of female staff, officials, contractors, and volunteers with the same or higher level of expertise and experience with the subject matter (Winfield; Martinez);
35. Restructuring, underfunding, and interfering with the operations of County departments for the personal gain of County officials or their family and friends (Winfield; Martinez; Stocks); and
36. Retaliating against female officials and staff for participating in protected activities, including filing of this Notice of Claim and participating in interviews with the County investigator, which retaliation includes demotions and budget reductions (Winfield; Martinez; Stocks).

Enough is enough. Pursuant to Section 1983 of Title 42 of United States Code, Grand County must remedy this unlawful, systematic wrongdoing and take actions to prevent further discrimination and other malicious torts.

We demand reform and respect. These complainants deserve an apology. The County must take accountability and acknowledge that it failed to protect these women from an unsafe, discriminatory workplace. Bill Winfield, Brian Martinez, and Stephen Stocks should be publicly censured. The County must invest in meaningful harassment training and education and enforce participation on an annual basis. The HR Department should be assigned outside counsel and a budget to fund them. The Policies and Procedures for the Grand County Commission must be updated to clearly prohibit commissioner interference with department and staff operations. We are also entitled to attorneys' fees and costs for filing this complaint and some of these women deserve financial compensation for lost wages, damage to their reputation, and mental anguish.

Sincerely,

A handwritten signature in blue ink, appearing to read 'CR Sloan', with a checkmark at the end.

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Christina R. Sloan, Esq.

cc: Utah Local Governments Trust