

INTERNATIONAL BROTHERHOOD OF TEAMSTERS

SEAN M. O'BRIEN

General President

25 Louisiana Avenue, NW
Washington, DC 20001



FRED E. ZUCKERMAN

General Secretary-Treasurer

202-624-6800
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April 30, 2024

VIA Regular Mail & Email (icandoconsulting@gmail.com)

John P. Owens, Consultant
10160 McDowell Shortcut Road
Murrells Inlet, SC 29576

Dear Mr. Owens:

On or about January 16, 2024, you entered into a consulting agreement with APA Teamsters Local 2118 ("Local 2118") whereby you agreed to provide consulting services in support of Local 2118's contract negotiations (including NMB mediation) with Allegiant Air, LLC ("Allegiant Air"). Your agreement with Local 2118 does not include your participation in the internal affairs of Local 2118. Despite this incontrovertible fact, you have actively participated and interfered in the internal affairs of Local 2118 over the last several months.

Your actions have included written communications to former president Robles criticizing and characterizing as a "witch hunt," the International Union's audit of Local 2118 and its Executive Board's adherence to financial, accounting and governance procedures and policies required by the Local 2118 Bylaws and the Constitution of the International Union. Your actions have also included developing and sharing a "position response" with Local 2118's former principal officer, Robles, and his well-compensated consulting colleague, David Bourne, shortly before Local 2118 was placed in emergency trusteeship. Your recommended course of action, as set forth in your "position response," was to absolve Robles and five other now-removed members of the Local 2118 Executive and to lay blame for Local 2118's financial and governance failings squarely on the International Union and Scott Hegland, the Local 2118 temporary trustee of Local 2118 while it was in structural trusteeship during the period from May 2020 to early 2022 as well as upon Joseph Ryan, Local 2118's former Secretary-Treasurer whom you characterized as the "chief accuser" and person "specifically responsible for the accusations of impropriety" that Brother Ryan brought to the attention of the International Union.

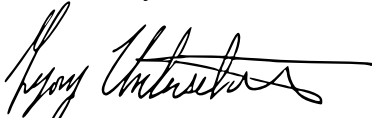
Your conduct in sharing your "position response" with Mr. Bourne is also inconsistent with your representations to me that you had cut ties with David Bourne and his consulting company. Your recent acknowledgment to me last week that you continue to do business with Mr. Bourne is also problematic and inconsistent with your prior representations. As I sat next to

you at the Allegiant business presentation last week, no less than two email or text pings/alerts from David Bourne appeared on the computer you provided me.

Furthermore, I have received a disturbing report that you have been inquiring of members on the negotiating committee regarding last Saturday's trusteeship hearing, asking them whether they attended the meeting, whether they spoke at the hearing and what they said at the hearing. Your actions and communications indicate that you have played an active role in attempting to thwart the International Union's audit of Local 2118, and that you continue to support Local 2118's now-removed principal officer, his fellow former Executive Board members, and Mr. Bourne. Mr. Bourne played an important role in placing Mr. Robles in his former position, from which both Mr. Robles and Mr. Bourne profited handsomely and, moreover, in securing your contract with Local 2118.

By your actions and communications, you have placed yourself in conflict with the interests and objectives of Local 2118 and its membership while it is under emergency trusteeship and have caused me to lose confidence and trust in you. Accordingly, this is to inform you that your services with Local 2118 are hereby terminated, effective immediately. I expect and request that you provide me with all documents and other property of Local 2118 in your possession, including all memoranda, contract proposals, and bargaining notes. I also expect and direct that you cease all communications on behalf of Local 2118 with Allegiant Air and its representatives on any matter directly or indirectly related to contract negotiations with the carrier and representation of its Pilots, the Local 2118 bargaining committee, Local 2118 representatives, and members regarding Local 2118's negotiations with Allegiant Air, and all other matters relating to the affairs of Local 2118.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Unterseher", with a long horizontal flourish extending to the right.

Greg Unterseher
Temporary Trustee
APA Teamsters Local 2118

cc: Ed Gleason, Esq