



UNITED SCHUTZHUND CLUBS OF AMERICA
For the German Shepherd Dog

TO: Lisa Freeny, AWDF Secretary
FROM: Jim Alloway (Et. Al.), President (Directors) of USCA
DATE: July 1, 2018
RE: Charges Against USCA, Et. Al.

RECUSAL

The United Schutzhund Clubs of America (USCA) respectfully assert that the following Board of Inquiry members must be recused for bias. Recusal for actual bias and impropriety are not the standard, but instead, the hint or appearance of bias and impropriety are sufficient. Three of the members of the BOI have historically shown strong, outspoken negative opinions of USCA.

(a) Any justice, judge, or magistrate judge of the United States shall disqualify himself in any proceeding in which his impartiality might reasonably be questioned.

(b) He shall also disqualify himself in the following circumstances:

(1) Where he has a personal bias or prejudice concerning a party, or personal knowledge of disputed evidentiary facts concerning the proceeding;

(2) Where in private practice he served as lawyer in the matter in controversy, or a lawyer with whom he previously practiced law served during such association as a lawyer concerning the matter, or the judge or such lawyer has been a material witness concerning it;

- USCA reasonably believes that the following individuals will reasonably have an appearance of impropriety.
- USCA believes that the (a) above necessitates that the following be recused to avoid even the smallest hint where impartiality might be questioned. It is reasonable that the three below have questionable bias.
- Attachments 1-3 indicate proof of bias / lack of impartiality.

Christopher Smith
Leslie Carpenter
Amanda Hoskinson

Further, Anne Camper is listed as the alternate. This is a violation of the AWDF bylaws (ARTICLE VII: COMMITTEES / SECTION 1. STANDING COMMITTEES / b. Board of Inquiry / (i) The board of inquiry consists of five (5) members and two (2) alternates. *Members of the Executive Board may not serve on the Board of Inquiry.*



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ANSWER

The directors of the United Schutzhund Clubs of America (USCA) have not knowingly worked to damage the American Working Dog Federation (AWDF). Further Ms. Camper has filed defamatory unsportsmanlike charges against men and women that are veterans, firemen, police, and rescue personnel. They have dedicated their lives, not only to dog sport, but to their respective communities. As shown below, there is no proof offered as to any intent by anyone in USCA to support the charges filed.

1. USCA has taken no steps to hurt / damage the AWDF
2. The AWDF has suffered no actual damages
3. The USCA EB approved an e-ballot that raised dues for non-USCA members. Every member club is free to charge whatever fees they choose for both members and non-members. This fee increase has been discussed for over 10 years and had no intent to hurt the AWDF or the AWDF Championship.
4. There is no proof offered as to unsportsmanlike conduct.
5. Several of the charges fall outside of the 3-month filing window.

Charges

#1 On March 19, 2018 the USCA executive board names above, voted to pass EB Ballot #05-18. This ballot raises the previous "filing fee" of \$25 to \$100 for any non-USCA member provided they are not a member of the competing organization to the AWDF known as the AWDC.

#2 I/we assert that outside of being a punitive measure, this demonstrates the clear desire of USCA Et Al to damage the AWDF by endorsing and promoting the competing organization known as the AWDC.

- All AWDF member clubs are free to charge whatever they choose for members or non-member participation in their trials. Exhibit 6 clearly demonstrates a punitive charge. It's an AWMA penalty, TO MEMBERS, for late entry into the National Championship. The punitive amount is set at an additional \$75 for a total entry fee of \$250. This punitive amount, charged by Ms. Camper et al, is not for additional services, as USCA provides to its members and non-members. This is just for being one day late. This is by no means a criticism of the fee as that is the club's right. It is for illustrative / comparative reference only.
- The USCA fee increase was for ALL NON-MEMBERS, not specifically for AWDF member clubs nor for any specific breed. There was no punitive nature by singling out AWDF member clubs. There is no offer of proof of any action by USCA being "punitive."
- USCA did not "endorse" or "promote" a competing organization. USCA has given no money, no advertisement, no human resource, nothing by way of support. Ms. Camper offers no proof to the contrary.
- The AWDC included in the e-ballot is irrelevant. No clubs can join AWDC so no group is given a benefit over any of the other AWDF clubs. If the term "AWDC" was removed it would have no bearing on the e-ballot.



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- The assertion that the AWDC included in the e-ballot demonstrates a “clear desire of USCA Et Al to damage the AWDF . . . ” is not correct and overbroad. There is no ability for anyone to join AWDC and therefore a moot point. There is no way for this e-ballot to harm AWDF. There is no offer of any proof that USCA intended to or knowingly caused AWDF any harm.

#3 I/we assert the AWDC is an instrument created by USCA to replace the AWDF as the FCI recognized federation of working dog and sport clubs in the United States in order to control the AWDF Championship.

- Competition is not illegal nor is it unsportsmanlike. On the contrary competition is the cornerstone of our sport and of the American free market economy.
- USCA did not create the AWDC. In order for USCA to have formed the AWDC, there would had to have been an e-ballot to approve the creation. Ms. Camper offers no proof of such an e-ballot, as it does not exist.
- While the AWDF EB may have been disappointed or upset by the creation of the AWDC, they did not find it unsportsmanlike as evidenced by the ongoing discussion that took place to form / promote a joint USCA/ADWF combined single championship.
- *If the BOI finds that the creation was unsportsmanlike then the charges should have been filed within 3 months of the discovery of the organization. These charges fall well outside of the 3-month filing window. Discussions to form a joint championship event commence in October of 2017.*
 - Charges must have been filed within 3 months of the discovery of the formation of the AWDC (See ATTACHMENT 4). They were not.
 - Negotiations between AWDF, Jim Alloway, and the subsequent suspension of AWDC action/progress, prove that the Ms. Camper believed Jim Alloway when he asserted that his sole driver was to ensure a world-class event and that the formation and idea of a better championship was not unsportsmanlike. See ATTACHMENT 5 for dates.
- There was never an intention to damage anyone nor were there any actual damages - quite the opposite. The intent was to ensure that every competitor and dog received the most exceptional experience possible at the annual FCI selection championship.

#4 I/we assert that even before the above mentioned ballot was passed, Vadim Plotsker and Nathaniel Roque (USCA Vice President and USCA Director of Judges respectively) misused their positions with USCA to communication with the FCI Working Commission President Frans Jansen in order to both advertise their purpose of creating the AWDC as well as elicit his help in doing so.

- USCA refutes this point. This was a simple inquiry expected of DOJ and VP of the organization in order to obtain the truth. A careful reading of the email shows just that.
- There is no unsportsmanlike conduct.
- This charge should not be heard as it references Attachment 3 dated December 13, 2017 which falls well outside the 3-month filing requirement. See ATTACHMENT 4



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#5 I/we assert that USCA Et Al have a longstanding history of manipulating AWDF policy for the purpose of dismantling the AWDF in order to take control of the AWDF Championship.

- USCA refutes this point.
- There is no unsportsmanlike conduct.
- This charge should not be heard as it references Attachment 5 which was not included in the complaint. Regardless, this charge is vague, offers no proof, and falls well outside the 3-month filing requirement. See ATTACHMENT 4



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ATTACHMENT 1

Christopher Smith shows bias with a presumption that there has “been an agenda within USCA to sabotage the event” (i.e. the AWDF Championship).

Christopher Smith

Inbox - iCloud December 19, 2017 at 8:42 PM



Re: Negotiations

[Details](#)

To: Vadim Plotsker, Cc: Camper, Anne, Tracy Klopp, Ted Hartman & 24 more

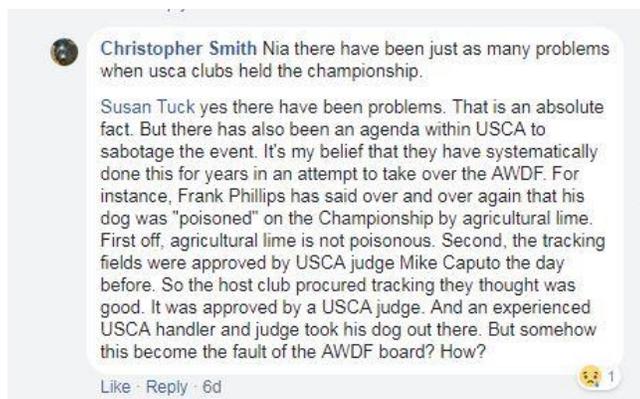
USCA and or it's representatives have worked in bad faith on this from the very beginning. It has become very apparent that they never had any type of authorization from anyone in the FCI. And after declarations from Vadim and Jim that they had the backing of USCA we find that that was not accurate.

But the seed of this bad faith was planted when USCA tried to form a competing organization while they were still a member of the AWDF. That act in and of itself was the ultimate act of bad faith to every member of this federation.

I find it insulting to the intelligence of these delegates for USCA to come to this board and accuse anybody of dishonesty, much less Anne Camper. If Anne had simply said no and slammed the door we would be in the exact same place we are now. But she tried to work with them and find an equatable solution. In my opinion all she has done wrong is giving USCA and it's representatives the respect and deference that she is shown all members of this federation, even though USCA obviously doesn't deserve it.

Happy Holidays everyone. Hopefully we can start the new year without drama, dishonesty or other nonsense.

Christopher





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Angie Stark  **Christopher Smith** I think it's important for all parties to let go of prior behavior, sit down with a list of things they want and compare. I think all parties will see there has been a lot of miscommunication due to emotions getting involved and that in the end, everyone wants the same thing. If we continue to point fingers at each other, we will only live in the past and nothing positive will get accomplished. We must find a way to move past the past and begin to rebuild trust.

Like · Reply · 12w



Christopher Smith I strongly disagree. Prior behavior is an indicator of future behavior. It's like a credit rating. If you screw up your credit you have to build it back up. You don't just go to the bank and expect to have your prior irresponsibility forgiven instantly. You have to earn your way back to good credit by making small steps.

We also need to examine how we got to this point. Many people in the sport believe that this is just one incident that has brought us to this point and I believe they should have ALL of the information so they can make educated decisions and know exactly what's going on. If you look at the complaints of many recently, they are complaining about a lack of transparency.

In this case USCA is still showing the same irresponsible behavior without a bit of remorse. Should they at least admit that what they are doing is wrong before we move on? They are actively seeking to destroy, at this very moment, the same organization that you want to forgive and move on.

I think that we need many different approaches to solving these problems. You do you and I'll do me.

Like · Reply · 12w · Edited





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Marisha Steward **Thomas Barriano** I am just stating the facts provided. I am hoping that in the end everyone benefits whether it's via a new organization (i.e. AWDC) or the existing organization AWDF or mutual agreement of all the parties involved.

Like · Reply · 12w



Thomas Barriano The only way this works out IMO is an independent AWDF. USCA can stick with the WUSV and AWDF sticks with the FCI

Like · Reply · 12w



Write a reply...



Nia-Renie Cottrell Boy, this sounds like those elixirs that the snake oil salesman used to foist off on people. Even P.T. Barnum wouldn't have tried this one! 🤔🤔🤔🤔🤔🤔🤔🤔

Like · Reply · 12w



Adrienne Isabel That's where my Mind went lol

Like · Reply · 12w



Christopher Smith I thought it sounded like a drug dealer. The first time is free. The next thing you know you're out turning tricks and the dealer is driving a new Benz.

Like · Reply · 12w · Edited





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ATTACHMENT 2

Amanda Hoskinson shows dislike and bias toward USCA.

 **Amanda Hoskinson** Forced membership....just like the ridiculous claim of # of trials. I wonder how many trials they'd actually have if that wasn't forced (mandatory event every year) on it's clubs.
A "use" of their judges, helpers& tracklayers??? The judges are paid, the helper and tracklayers offer their bodies so the usca can make money off their hard work. Seems fair to me 🙄

Like · Reply · 12w · Edited  5



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ATTACHMENT 3

☆ Leslie Carpenter

All Mail - USCA January 24, 2018 at 6:23 AM



RE: AWDF Championship entry process

[Details](#)

To: Vadim Plotsker, Cc: Camper, Anne, Tracy Klopp & 28 more

I would add to my comments ... it is true that USCA has, since it's early beginnings, traditionally been open to all breeds for membership and competitions, except in more recent years, for their GSD national. And AWDF clubs have accepted that situation for years and been happy to receive the benefits of that relationship. I don't think it's fair to come forward four months before the Championship and insist that USCA is suddenly a breed club OR an all-breed club within the AWDF. IMO, if we (AWDF) want to apply that constraint (that USCA must declare as a breed club or an all-breed club), then that issue needs to come before the member clubs for a vote and be applied at least a year in advance of the next championship. It needs thorough discussion because there is a lot of potential fallout from forcing such a decision. Right now, tensions are really high already, and I think that it's not helpful to finding a resolution to add this additional contentious issue into our discussion.

On the other hand, if USCA (or any other breed club) is going to send a non-primary-breed dog/handler team to the AWDF Championship, and that non-primary-breed dog/handler team actually secures a spot on the FCI world team, who is going to sponsor that team to the FCI Championship? In my opinion, if you (the member club) submit a team entry to the Championship, then you support them all the way through to the worlds. You provide the same level of financial assistance to the alternate breed dog/handler team that you do for your primary breed dog/handler teams. That's not to say that the other breed clubs won't help individuals with their own breed, even if they aren't members, but it is to stay that the primary responsibility for supporting the team to the worlds lies with the submitting organization. In other words, if you are going to be an all-breed club, then you support your alternate breed members.

IMO, USCA leadership acted in bad faith and ethics by accepting AWDF money to attend the FCI meetings and supposedly represent the AWDF at the FCI while at the same trying to undermine our organization. USCA may have tried to destroy the AWDF, but AWDF member clubs don't have to try to damage the USCA or its members. All of us can act in the best interests of our own breeds, member clubs, and the AWDF to keep open an opportunity for all of our dogs to compete internationally. Let's find a way to move forward out of this mess to improve our Championship and our federation.

UDC will support the AWDF, whatever the final decision might be, but we need to try to work together to seek a solution.

Leslie
Leslie Carpenter
UDC President & AWDF Delegate 2016-2018



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ATTACHMENT 4

FROM THE ADWF BYLAWS:

SECTION 3. DISCIPLINE

- a. Any member club in good standing, any individual member of a member club in good standing, the General Board, or the Executive Board may submit a charge in writing to the Secretary. ***Charges must be filed within three months of the alleged violation.*** Charges may be brought against clubs or individual members of member clubs.



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ATTACHMENT 5

On Dec 18, 2017, at 10:52 AM, Camper, Anne <acamper@montana.edu> wrote:

Jim, Annetta and I had a call last night to resume negotiations. It was productive, with an agreement made on the wording of the attached document. The three items that were problematic in the version in play when USCA ceased negotiations have been resolved. This version is very similar to what was developed early in the process and sent to all of you prior to our delegate phone call. Recall that in the vote that followed that call, the AWDF board was given the authority to negotiate an agreement based on that document and the discussion we had during that call. As you will see, there is a clause in the agreement that USCA will cease and desist in the pursuit of the creation of an organization that competes with the AWDF. The agreement will be for three years; after that time we can all renegotiate and decide if this is the best direction for the AWDF and USCA.

It is my understanding that Jim will be presenting this document to his board with a phone meeting tonight. This would be followed by a USCA e-ballot. When accepted by USCA and then signed by both parties, a simultaneous announcement will be made by AWDF and USCA.

While we wait for this vote, the AWDF will continue to plan for a separate event. No contracts for a separate event will be signed unless USCA fails to authorize the agreement for the combined event. I anticipate a final decision on this in the very near future.

If any of you have questions about the process, please feel free to give me a call, [406-599-4755](tel:406-599-4755). It may take a bit for me to get back to you since I have to work for a living and I'll be out tomorrow for a process to hopefully fix a partially torn tendon and ligament.

Anne

<awdf usca for delegates revisedcomments 4.pdf>



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ATTACHMENT 6

2018 AWMA Malinois National Championship entry fee is:

IPO 1,2,3 - \$ 175

BH dogs - \$100

Buy Now



Please specify what are you paying for under
Instructions to merchant : Entry

The entry fee includes:

- A dinner at the draw night,
- \$ 25 will be collected from each competitor and will go toward next years AWMA Championship

Late entry fee for the 2018 AWMA Malinois National Championship fee
is:

\$ 250