


EXHIBIT 7

Henderson Privilege Log Doc#3



COUNCIL SUPPORT
WEEKLY REPORT
Feb. 1-7, 2016

CONSTITUENT SERVICES – HOT TOPICS

Current Issues

27

Continuing to meet on individual constituent issues in early March

Weekly Change

UPCOMING EVENTS COUNCIL ATTENDING

1/4/17

Arizona: Councilmember Schroder will attend the One-on-One meeting.
CA 2017 National Advisory Committee: Mayor Hahn will attend this meeting.

Feb 17/18

Tropical Paradise Street: Mayor Hahn and Councilmember March will read to the students at Phoenix Academy, Tempe.

Feb 18

Verde Valley Chamber of Commerce: Councilmember March will speak at this event.

COUNCIL SUPPORT ORGAN LIP


Mayor Hahn gave his 2016 State of the City address 2/3 with all Council members attending.

Councilmembers March & Schroder attended the Foundation Assisting Services Annual Appreciation Dinner 2/3.

Councilmember March spoke at the Madro Canyon HOA meeting 2/4.

Councilmember Schroder spoke at the Tropicana Square HOA Meeting 2/4.

Mayor Hahn attended an Eagle Scout Court of Honor 2/6.




PUBLIC INFORMATION & MARKETING

WEEKLY REPORT

Feb. 1-7, 2016

Current Marketing Campaigns




A Celebration of Gospel and Black History


Saturday, February 27
11am-3pm

Backstrom Theatre 1201-1251 Locust St.
Eagleville Arts Center

African American art exhibits
 Live gospel performances
 Cultural dance performances
 Food presentations (Wine and Ale)




<http://Philadelphia.gov> | 703-267-2171



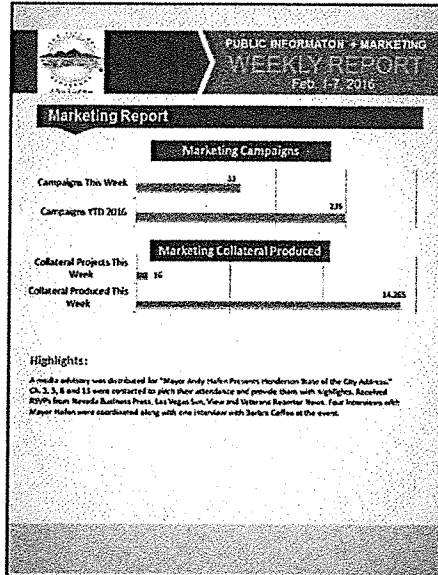
A Celebration of Gospel and Black History

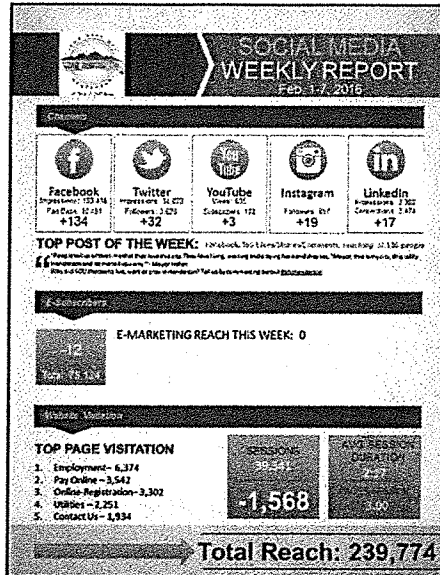
ENTERTAINMENT

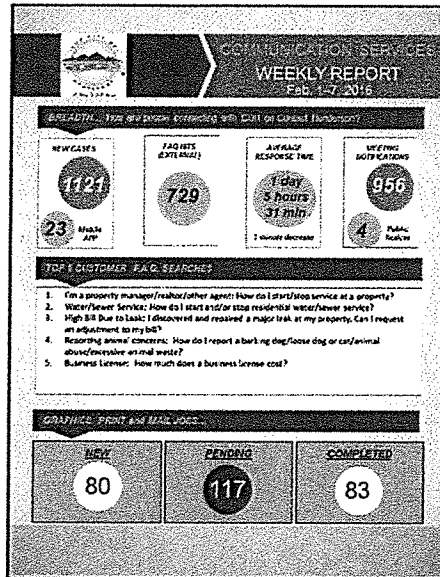
Various Churches
 Eagles Church Choir and Big Band
 Kent College of Music
 Community Baptist Church Choir
 Mounting Tech Ministries Choir
 Hope Baptist Church Choir
 Trinity Community
 St. Paul's African American Church
 Kappa and Omega Epsilon University
 One Night Only
 Choir in the Holy Spirit Center
 Mary M. Curran



<http://Philadelphia.gov> | 703-267-2171







Henderson Privilege Log Doc#184

From: Bud Cranor [Bud.Cranor@cityofhenderson.com]
Sent: Tuesday, February 16, 2016 7:32 PM
To: Tim DSouza
Subject: FW: Trosper Communications
Attachments: Contract Amendment Request Form.pdf

Tim, can we discuss tomorrow? Thanks.

Redaction

240 Water Street, MSC 144
Henderson, Nevada 89015
Phone: (702) 267-1239 | Fax: (702) 267-1201
Laura.Kopanski@cityofhenderson.com
Office Hours: Monday – Thursday 7:30 a.m. to 5:30 p.m.

Confidentiality Notice: This electronic communication and any accompanying document contain information belonging to the sender which may be confidential and legally privileged. This information is intended only for the use of the individual or entity to whom this electronic transmission was sent as indicated above. If you are not the intended recipient, any disclosure, distribution or action taken in reliance on the contents of the information contained in this electronic transmission is strictly prohibited. If you have received this transmission in error, please notify me immediately by e-mail and delete the original message. Thank you.



From: Luke Fritz
Sent: Tuesday, February 16, 2016 9:30 AM
To: Laura Kopanski
Subject: RE: Trosper Communications

Hi Laura,
I can get started, but I will need you to please return the attached form to me as well.

Thank you,

Luke Fritz | Sr. Purchasing Specialist
City of Henderson | Finance Department
240 Water Street, Henderson, NV 89015
Phone: (702) 267-1717

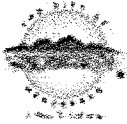
From: Laura Kopanski
Sent: Thursday, February 11, 2016 5:00 PM
To: Luke Fritz
Subject: Trosper Communications

Luke,
Please place this in our standard purchasing agreement. Thank you.

Laura Kopanski | Senior Legal Assistant
Henderson City Attorney's Office – Civil Division
240 Water Street, MSC 144
Henderson, Nevada 89015
Phone: (702) 267-1239 | Fax: (702) 267-1201
Laura.Kopanski@cityofhenderson.com

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Henderson Privilege Log Doc#195

From: Tim DSouza [Tim.DSouza@cityofhenderson.com]
Sent: Thursday, February 18, 2016 9:05 AM
To: Bud Cranor
Subject: RE: Trosper Communications

Just confirming that the CMTS number will be provided by Purchasing.

Tim

From: Bud Cranor
Sent: Tuesday, February 16, 2016 7:32 PM
To: Tim DSouza
Subject: FW: Trosper Communications

Tim, can we discuss tomorrow? Thanks.

From: Kristina Gilmore
Sent: Tuesday, February 16, 2016 9:54 AM
To: Bud Cranor
Cc: Laura Kopanski
Subject: FW: Trosper Communications

Redaction

Kristina E. Gilmore
Assistant City Attorney
240 Water Street, PO Box 95050, MSC 144, Henderson NV 89009-5050
702-267-1219 | Fax: 702-267-1201 | Kristina.Gilmore@cityofhenderson.com
Assistant: 702-267-1239 or Laura Kopanski at Laura.Kopanski@cityofhenderson.com
Office Hours: Monday - Thursday 7:30a.m. to 5:30p.m.

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From: Laura Kopanski
Sent: Tuesday, February 16, 2016 9:46 AM
To: Kristina Gilmore
Subject: FW: Trosper Communications

Redaction

Laura Kopanski | Senior Legal Assistant
Henderson City Attorney's Office - Civil Division
240 Water Street, MSC 144
Henderson, Nevada 89015
Phone: (702) 267-1239 | Fax: (702) 267-1201
Laura.Kopanski@cityofhenderson.com
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Subject: RE: Trosper Communications

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City of Henderson | Finance Department
240 Water Street, Henderson, NV 89015
Phone: (702) 267-1717

From: Laura Kopanski
Sent: Thursday, February 11, 2016 5:00 PM
To: Luke Fritz
Subject: Trosper Communications

Luke,
Please place this in our standard purchasing agreement. Thank you.

Laura Kopanski | Senior Legal Assistant
Henderson City Attorney's Office - Civil Division
240 Water Street, MSC 144
Henderson, Nevada 89015
Phone: (702) 267-1239 | Fax: (702) 267-1201
Laura.Kopanski@cityofhenderson.com
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Henderson Privilege Log Doc#1807

From: Javier Trujillo [Javier.Trujillo@cityofhenderson.com]
Sent: Saturday, October 08, 2016 8:38 AM
To: David Cherry
Subject: Fwd: Trosper Communications public records request - attorney-client privileged communication

FYI.

Javier Trujillo
Director of Public Affairs
City Manager's Office
City of Henderson
(702) 267-2060
Javier.Trujillo@cityofhenderson.com

Begin forwarded message:

From: Javier Trujillo <Javier.Trujillo@cityofhenderson.com>
Date: October 7, 2016 at 8:14:02 PM PDT
To: Kristina Gilmore <Kristina.Gilmore@cityofhenderson.com>
Cc: Brian Reeve <Brian.Reeve@cityofhenderson.com>, Javier Trujillo <Javier.Trujillo@cityofhenderson.com>
Subject: RE: Trosper Communications public records request - attorney-client privileged communication

Redaction

Redaction

Javier Trujillo
Director of Public Affairs
City Manager's Office
City of Henderson
(702) 267-2060
Javier.Trujillo@cityofhenderson.com

From: Javier Trujillo
Sent: Wednesday, October 05, 2016 8:53 PM
To: Kristina Gilmore
Cc: Brian Reeve
Subject: Re: Trosper Communications public records request - attorney-client privileged communication

Redaction

Javier Trujillo
Director of Public Affairs
City Manager's Office
City of Henderson
(702) 267-2060
Javier.Trujillo@cityofhenderson.com

On Oct 5, 2016, at 8:44 PM, Kristina Gilmore <Kristina.Gilmore@cityofhenderson.com> wrote:

Redaction

Redaction

Kristina

Sent from my iPhone

On Oct 5, 2016, at 8:33 PM, Javier Trujillo
<Javier.Trujillo@cityofhenderson.com> wrote:

Redaction

Javier Trujillo
Director of Public Affairs
City Manager's Office
City of Henderson
(702) 267-2060
Javier.Trujillo@cityofhenderson.com

On Oct 5, 2016, at 3:45 PM, Brian Reeve
<Brian.Reeve@cityofhenderson.com> wrote:

Redaction

Redaction

Henderson Privilege Log Doc#1808

From: David Cherry [David.Cherry@cityofhenderson.com]
Sent: Saturday, October 08, 2016 9:51 AM
To: Javier Trujillo
Subject: Re: Trosper Communications public records request - attorney-client privileged communication

Thanks Javi

Hope you are enjoying your Saturday.

Best,

David

On Oct 8, 2016, at 8:37 AM, Javier Trujillo <Javier.Trujillo@cityofhenderson.com> wrote:

FYI.

Javier Trujillo
Director of Public Affairs
City Manager's Office
City of Henderson
(702) 267-2060
Javier.Trujillo@cityofhenderson.com

Begin forwarded message:

From: Javier Trujillo <Javier.Trujillo@cityofhenderson.com>
Date: October 7, 2016 at 8:14:02 PM PDT
To: Kristina Gilmore <Kristina.Gilmore@cityofhenderson.com>
Cc: Brian Reeve <Brian.Reeve@cityofhenderson.com>, Javier Trujillo <Javier.Trujillo@cityofhenderson.com>
Subject: RE: Trosper Communications public records request - attorney-client privileged communication

Redaction

Redaction

Javier Trujillo
Director of Public Affairs
City Manager's Office
City of Henderson
(702) 267-2060
Javier.Trujillo@cityofhenderson.com

From: Javier Trujillo
Sent: Wednesday, October 05, 2016 8:53 PM
To: Kristina Gilmore
Cc: Brian Reeve
Subject: Re: Trosper Communications public records request - attorney-client privileged communication

Redaction

Javier Trujillo

Director of Public Affairs
City Manager's Office
City of Henderson
(702) 267-2060
Javier.Trujillo@cityofhenderson.com

On Oct 5, 2016, at 8:44 PM, Kristina Gilmore
<Kristina.Gilmore@cityofhenderson.com> wrote:

Redaction

Kristina

Sent from my iPhone

On Oct 5, 2016, at 8:33 PM, Javier Trujillo
<Javier.Trujillo@cityofhenderson.com> wrote:

Redaction

Javier Trujillo
Director of Public Affairs
City Manager's Office
City of Henderson
(702) 267-2060
Javier.Trujillo@cityofhenderson.com

On Oct 5, 2016, at 3:45 PM, Brian Reeve
<Brian.Reeve@cityofhenderson.com>
wrote:

Redaction

Redaction

Henderson Privilege Log Doc#1809

From: Javier Trujillo [Javier.Trujillo@cityofhenderson.com]
Sent: Saturday, October 08, 2016 9:54 AM
To: David Cherry
Subject: Re: Trosper Communications public records request - attorney-client privileged communication

You too, Brother. Have a wonderful weekend! See you in Carson City! :)

Javier Trujillo
Director of Public Affairs
City Manager's Office
City of Henderson
(702) 267-2060
Javier.Trujillo@cityofhenderson.com

On Oct 8, 2016, at 9:51 AM, David Cherry <David.Cherry@cityofhenderson.com> wrote:

Thanks Javi

Hope you are enjoying your Saturday.

Best,

David

On Oct 8, 2016, at 8:37 AM, Javier Trujillo <Javier.Trujillo@cityofhenderson.com> wrote:

FYI.

Javier Trujillo
Director of Public Affairs
City Manager's Office
City of Henderson
(702) 267-2060
Javier.Trujillo@cityofhenderson.com

Begin forwarded message:

From: Javier Trujillo
<Javier.Trujillo@cityofhenderson.com>
Date: October 7, 2016 at 8:14:02 PM PDT
To: Kristina Gilmore
<Kristina.Gilmore@cityofhenderson.com>
Cc: Brian Reeve <Brian.Reeve@cityofhenderson.com>, Javier Trujillo <Javier.Trujillo@cityofhenderson.com>

**Subject: RE: Trosper Communications public records
request - attorney-client privileged communication**

Kristina/Brian,

Redaction

Javier Trujillo
Director of Public Affairs
City Manager's Office
City of Henderson
(702) 267-2060
Javier.Trujillo@cityofhenderson.com

From: Javier Trujillo
Sent: Wednesday, October 05, 2016 8:53 PM
To: Kristina Gilmore
Cc: Brian Reeve
Subject: Re: Trosper Communications public records request - attorney-client privileged communication

Redaction

Javier Trujillo
Director of Public Affairs
City Manager's Office
City of Henderson
(702) 267-2060
Javier.Trujillo@cityofhenderson.com

On Oct 5, 2016, at 8:44 PM, Kristina Gilmore
<Kristina.Gilmore@cityofhenderson.com> wrote:

Redaction

Sent from my iPhone

On Oct 5, 2016, at 8:33 PM, Javier Trujillo
<Javier.Trujillo@cityofhenderson.com>
wrote:

Redaction

Redaction

Javier Trujillo
Director of Public
Affairs
City Manager's Office
City of Henderson
(702) 267-2060
Javier.Trujillo@cityofhenderson.com

On Oct 5, 2016, at 3:45
PM, Brian Reeve
<Brian.Reeve@cityofhenderson.com> wrote:

Redaction

Redaction

Redaction

Redaction

Redaction

Henderson Privilege Log Doc#2485

From: Gerri Schroder [Gerri.Schroder@cityofhenderson.com]
Sent: Thursday, January 14, 2016 4:39 PM
To: Josh Reid
Subject: Fwd: [Action Needed] - HDA position letter: West Henderson project rezoning item

Redaction

Gerri Schroder
Councilwoman Ward 1
City of Henderson
240 Water Street, 4th Floor
Henderson, Nevada 89015
702-267-2403
Gerri.schroder@cityofhenderson.com
www.cityofhenderson.com
Sent from my iPhone

Begin forwarded message:

From: Scott Muelrath <smuelrath@hendersonchamber.com>
Date: January 14, 2016 at 3:48:53 PM PST
To: Amber Stidham <astidham@hendersonchamber.com>, Amy Palmeri <apalmeri@hendersonchamber.com>, Andrea Cole <acole@gcgarciainc.com>, "Arnold Lopez" <alopez@nvenergv.com>, Barbrea Coffee <Barbrea.Coffee@cityofhenderson.com>, Brad Miller <brad.miller@rcwilley.com>, Chet Opheikens <cheto@randoco.com>, Diana Saviano <Diana.Saviano@cityofhenderson.com>, Elizabeth Muse <ekmuse@olin.com>, "Elizabeth Trosper" (elizabeth@trospercommunications.com)" <elizabeth@trospercommunications.com>, "George Garcia" (ggarcia@gcgarciainc.com)" <ggarcia@gcgarciainc.com>, "Gerri Schroder" (Gerri.Schroder@cityofhenderson.com)" <Gerri.Schroder@cityofhenderson.com>, James Stein <james.stein@swgas.com>, Jeff Leake <Jeff.Leake@cityofhenderson.com>, "John Ramous" (johnr@harsch.com)" <johnr@harsch.com>, John Stewart <jstewart@julietlasvegas.com>, Leslie Hoyt <lhoyt@swlaw.com>, "Rick Smith" (Gerick@cox.net)" <Gerick@cox.net>, "Robert Anderson" (rcanderson@swlaw.com)" <rcanderson@swlaw.com>, Stu Hitchen <stuhitchen8@gmail.com>, "Tim Brooks" (timb@emeraldilandcasino.com)" <timb@emeraldilandcasino.com>, "Tony Dazzio" (tonydazzio@gmail.com)" <tonydazzio@gmail.com>, Windom Kimsey <Wkimsey@tska.com>
Cc: Amy Palmeri <apalmeri@hendersonchamber.com>

Subject: RE: [Action Needed] - HDA position letter: West Henderson project rezoning item

Hello all – thank you Amber for sending this out. HCC staff followed the recommendation from the last HDA meeting of preparing a position letter, vetted by the Executive Committee, then sent to the balance of the Trustees for consideration. Responses cover the full spectrum, and with so many different answers, it is clear further discussion is needed. This issue has been continued until March with the City Council, so we have time.

I suggest at the next HDA meeting we be prepared to discuss further as well as formalizing (or not) the concept of a West Henderson Sub-Committee that can knowledgeably vet these topics before presenting to the balance of the Trustees, and in turn the Board of Directors. These issues are highly relevant to the economic development of Henderson, and believe part of being relevant is to be involved in the dialogue – whether or not that ends up with position letter is probably a case-by-case situation.

Thank you for all the responses – a healthy exchange and part of the process. Please attend the next HDA meeting for further discussion.

Scott

From: Amber Stidham

Sent: Thursday, January 14, 2016 11:35 AM

To: Amber Stidham <astidham@hendersonchamber.com>; Amy Palmeri <apalmeri@hendersonchamber.com>; Andrea Cole <acole@gcgarciainc.com>; Arnold Lopez <alopez@nvenergy.com>; Barbra Coffee <Barbra.Coffee@cityofhenderson.com>; Brad Miller <brad.miller@rcwilley.com>; Chet Opheikens <cheto@randoco.com>; Diana Saviano <Diana.Saviano@cityofhenderson.com>; Elizabeth Muse <ekmuse@olin.com>; Elizabeth Trosper <elizabeth@trospercommunications.com>; George Garcia <ggarcia@gcgarciainc.com>; Gerri Schroder <Gerri.Schroder@cityofhenderson.com>; James Stein <james.stein@swgas.com>; Jeff Leake <Jeff.Leake@cityofhenderson.com>; John Ramous <johnr@harsch.com>; John Stewart <jstewart@julietlasvegas.com>; Leslie Hoyt <lhoyt@swiaw.com>; Rick Smith <Gerick@cox.net>; Robert Anderson <rcanderson@swlaw.com>; Scott Muelrath <smuelrath@hendersonchamber.com>; Stu Hitchen <stuhitchen8@gmail.com>; Tim Brooks <timb@emeraldlandcasino.com>; Tony Dazzio <tonydazzio@gmail.com>; Windom Kimsey <Wkimsey@tska.com>

Cc: Scott Muelrath <smuelrath@hendersonchamber.com>; Amy Palmeri <apalmeri@hendersonchamber.com>

Subject: [Action Needed] - HDA position letter: West Henderson project rezoning item

Good morning Trustees,

During the last HDA meeting several trustees discussed concern over possible rezoning of a West Henderson project to accommodate residential development. This issue that will be heard as an item during this coming Council meeting.

Attached is a position letter opposing the rezoning request. **We seek your input and/or vote (“yay” or “nay”) by no later than 6 p.m. today (Thursday, Jan. 13).** Per our bylaws, a simple majority vote is needed to approve this measure. Once approved, this letter will be circulated to HCC Executive Board members for final authorization.

If you have questions or would like to discuss this item further, please call me at 702-565-8951 (office) or, if after 1 p.m. today, call 702-499-2114 (cell).

Thank you,
Amber

****PLEASE NOTE CONFIDENTIALITY UNTIL FORMALLY VOTED UPON*****



<!--[if !vml]--><!--[endif]-->Amber Stidham – Director of
Government Affairs
Henderson Chamber of Commerce
Office 702.565.8951 | Direct 702.499.2114
astidham@hendersonchamber.com
590 South Boulder Highway
Henderson, Nevada 89015

www.HendersonChamber.com

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Henderson Privilege Log Doc#2487

From: Gerri Schroder [Gerri.Schroder@cityofhenderson.com]
Sent: Thursday, January 14, 2016 4:40 PM
To: Josh Reid
Subject: Fwd: [Action Needed] - HDA position letter: West Henderson project rezoning item
Attachments: ATT00001.htm; HDA.CityofHenderson.RezoneOpposition.1.11.2016.pdf; ATT00002.htm

Redaction

Gerri Schroder
Councilwoman Ward 1
City of Henderson
240 Water Street, 4th Floor
Henderson, Nevada 89015
702-267-2403
Gerri.schroder@cityofhenderson.com
www.cityofhenderson.com
Sent from my iPhone

Begin forwarded message:

From: Amber Stidham <astidham@hendersonchamber.com>
Date: January 14, 2016 at 11:34:48 AM PST
To: Amber Stidham <astidham@hendersonchamber.com>, Amy Palmeri <apalmeri@hendersonchamber.com>, Andrea Cole <acole@gcgarciainc.com>, "Arnold Lopez" <alopez@nvenergv.com>, Barbra Coffee <Barbra.Coffee@cityofhenderson.com>, Brad Miller <brad.miller@rcwilley.com>, Chet Opheikens <cheto@randoco.com>, Diana Saviano <Diana.Saviano@cityofhenderson.com>, Elizabeth Muse <ekmuse@olin.com>, "Elizabeth Trosper" <elizabeth@trospercommunications.com> <elizabeth@trospercommunications.com>, "George Garcia" <ggarcia@gcgarciainc.com> <ggarcia@gcgarciainc.com>, "Gerri Schroder" <Gerri.Schroder@cityofhenderson.com> <Gerri.Schroder@cityofhenderson.com>, James Stein <james.stein@swgas.com>, Jeff Leake <Jeff.Leake@cityofhenderson.com>, "John Ramous" <johnr@harsch.com> <johnr@harsch.com>, John Stewart <jstewart@julietlasvegas.com>, Leslie Hoyt <lhoyt@swlaw.com>, "Rick Smith" <Gerick@cox.net> <Gerick@cox.net>, "Robert Anderson" <rcanderson@swlaw.com> <rcanderson@swlaw.com>, Scott Muelrath <smuelrath@hendersonchamber.com>, Stu Hitchen <stuhitchen8@gmail.com>.

"Tim Brooks (timb@emeraldlandcasino.com)"
<timb@emeraldlandcasino.com>, "Tony Dazzio (tonydazzio@gmail.com)"
<tonydazzio@gmail.com>, Windom Kimsey <Wkimsev@tska.com>
Cc: Scott Muelrath <smuelrath@hendersonchamber.com>, Amy Palmeri
<apalmeri@hendersonchamber.com>
Subject: [Action Needed] - HDA position letter: West Henderson project
rezoning item

Good morning Trustees,

During the last HDA meeting several trustees discussed concern over possible rezoning of a West Henderson project to accommodate residential development. This issue that will be heard as an item during this coming Council meeting.

Attached is a position letter opposing the rezoning request. **We seek your input and/or vote ("yay" or "nay") by no later than 6 p.m. today (Thursday, Jan. 13).** Per our bylaws, a simple majority vote is needed to approve this measure. Once approved, this letter will be circulated to HCC Executive Board members for final authorization.

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Thank you,
Amber

PLEASE NOTE CONFIDENTIALITY UNTIL FORMALLY VOTED UPON*

<!--[if !vml]-->

Henderson Privilege Log Doc#2491

From: Gerri Schroder [Gerri.Schroder@cityofhenderson.com]
Sent: Thursday, January 14, 2016 4:42 PM
To: Josh Reid
Subject: Fwd: [Action Needed] - HDA position letter: West Henderson project rezoning item

Redaction

Gerri Schroder
Councilwoman Ward 1
City of Henderson
240 Water Street, 4th Floor
Henderson, Nevada 89015
702-267-2403
Gerri.schroder@cityofhenderson.com
www.cityofhenderson.com
Sent from my iPhone

Begin forwarded message:

From: Amber Stidham <astidham@hendersonchamber.com>
Date: January 14, 2016 at 12:07:48 PM PST
To: Gerri Schroder <Gerri.Schroder@cityofhenderson.com>
Subject: RE: [Action Needed] - HDA position letter: West Henderson project rezoning item

Noted.
Thank you.

From: Gerri Schroder [<mailto:Gerri.Schroder@cityofhenderson.com>]
Sent: Thursday, January 14, 2016 12:01 PM
To: Amber Stidham <astidham@hendersonchamber.com>
Cc: Amy Palmeri <apalmeri@hendersonchamber.com>; Andrea Cole <acole@gcgarciainc.com>; Arnold Lopez <alopez@nvenergy.com>; Barbra Coffee <Barbra.Coffee@cityofhenderson.com>; Brad Miller <brad.miller@rcwilley.com>; Chet Opheikens <cheto@randoco.com>; Diana Saviano <Diana.Saviano@cityofhenderson.com>; Elizabeth Muse <ekmuse@olin.com>; Elizabeth Trospen <elizabeth@trospencommunications.com>; George Garcia <ggarcia@gcgarciainc.com>; James Stein <james.stein@swgas.com>; Jeff Leake <Jeff.Leake@cityofhenderson.com>; John Ramous <johnr@harsch.com>; John Stewart <jstewart@julietlasvegas.com>; Leslie Hoyt <lhoyt@swlaw.com>; Rick Smith <Gerick@cox.net> <Gerick@cox.net>; Robert Anderson <rcanderson@swlaw.com> <rcanderson@swlaw.com>; Scott Muelrath <smuelrath@hendersonchamber.com>; Stu Hitchen <stuhitchen8@gmail.com>; Tim Brooks <timb@emeraldislandcasino.com> <timb@emeraldislandcasino.com>; Tony

Dazzio (tonydazzio@gmail.com) <tonydazzio@gmail.com>; Windom Kimsey
<Wkimsey@tska.com>

Subject: Re: [Action Needed] - HDA position letter: West Henderson project rezoning item

Hi everyone,

I will abstain from this conversation with HDA. I'm sure you understand the obvious reason.

Thanks,

Gerri Schroder
Councilwoman Ward 1
City of Henderson
240 Water Street, 4th Floor
Henderson, Nevada 89015
702-267-2403
Gerri.schroder@cityofhenderson.com
www.cityofhenderson.com
Sent from my iPhone

On Jan 14, 2016, at 11:34 AM, Amber Stidham
<astidham@hendersonchamber.com> wrote:

Good morning Trustees,

During the last HDA meeting several trustees discussed concern over possible rezoning of a West Henderson project to accommodate residential development. This issue that will be heard as an item during this coming Council meeting.

Attached is a position letter opposing the rezoning request. **We seek your input and/or vote ("yay" or "nay") by no later than 6 p.m. today (Thursday, Jan. 13).** Per our bylaws, a simple majority vote is needed to approve this measure. Once approved, this letter will be circulated to HCC Executive Board members for final authorization.

If you have questions or would like to discuss this item further, please call me at 702-565-8951 (office) or, if after 1 p.m. today, call 702-499-2114 (cell).

Thank you,
Amber

****PLEASE NOTE CONFIDENTIALITY UNTIL FORMALLY VOTED UPON*****

<image002.jpg> **Amber Stidham – Director of Government Affairs**
Henderson Chamber of Commerce
Office 702.565.8951 | Direct 702.499.2114
astidham@hendersonchamber.com
590 South Boulder Highway
Henderson, Nevada 89015
www.HendersonChamber.com

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<HDA.CityofHenderson.RezoneOpposition.1.11.2016.pdf>

Henderson Privilege Log Doc#4944

From: Kathy Blaha [Kathy.Blaha@cityofhenderson.com]

Sent: Wednesday, March 16, 2016 1:01 PM

To: Joanne Wershba; Ray Everhart

Subject: Arbor Day Calendar

I mentioned to you guys that I was concerned about the process for the Arbor Day calendar. Redaction

Redaction

Joanne, when is judging taking place and when will the images be available to give to Tronox/Trosper Communications?

Kathy Blaha

Public Information Officer

City of Henderson | Communications and Council Support

702-267-2052 | Kathy.Blaha@cityofhenderson.com

Henderson Privilege Log Doc#4954

From: Joanne Wershba [Joanne.Wershba@cityofhenderson.com]
Sent: Wednesday, March 16, 2016 1:10 PM
To: Kathy Blaha
Subject: RE: Arbor Day Calendar

Kathy,
I have the judging scheduled for Tuesday, March 29. The CBC members are supposed to come in and help. We will have over 1,000 posters to view. After the top 13 are chosen, I will bring them over to the Council office for the council members to choose the top 3. After that, we still have to scan the top 3 (we usually go to Kinko's and they do the artwork for us) for the framed posters. I estimate the posters will not be available until at least the second week of April.
Joanne

From: Kathy Blaha
Sent: Wednesday, March 16, 2016 1:01 PM
To: Joanne Wershba; Ray Everhart
Subject: Arbor Day Calendar

I mentioned to you guys that I was concerned about the process for the Arbor Day calendar.

Redaction

Redaction

Joanne, when is judging taking place and when will the images be available to give to Tronox/Trospen Communications?

Kathy Blaha
Public Information Officer
City of Henderson | Communications and Council Support
702-267-2052 | Kathy.Blaha@cityofhenderson.com

Henderson Privilege Log Doc#4955

From: Kathy Blaha [Kathy.Blaha@cityofhenderson.com]
Sent: Wednesday, March 16, 2016 1:36 PM
To: Joanne Wershba
Subject: RE: Arbor Day Calendar

Great – thanks Joanne!

Kathy Blaha
Public Information Officer
City of Henderson

From: Joanne Wershba
Sent: Wednesday, March 16, 2016 1:10 PM
To: Kathy Blaha
Subject: RE: Arbor Day Calendar

Kathy,
I have the judging scheduled for Tuesday, March 29. The CBC members are supposed to come in and help. We will have over 1,000 posters to view. After the top 13 are chosen, I will bring them over to the Council office for the council members to choose the top 3. After that, we still have to scan the top 3 (we usually go to Kinko's and they do the artwork for us) for the framed posters. I estimate the posters will not be available until at least the second week of April.
Joanne

From: Kathy Blaha
Sent: Wednesday, March 16, 2016 1:01 PM
To: Joanne Wershba; Ray Everhart
Subject: Arbor Day Calendar

I mentioned to you guys that I was concerned about the process for the Arbor Day calendar.

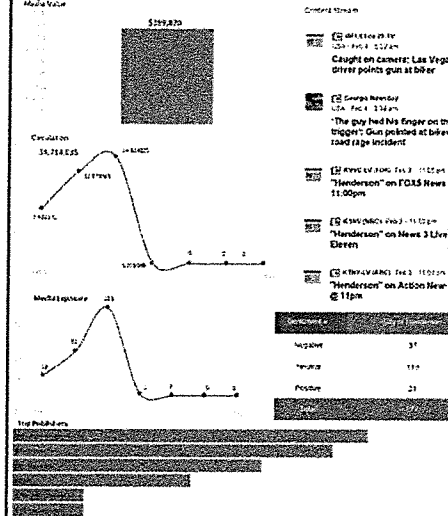
Redaction


Redaction

Joanne, when is judging taking place and when will the images be available to give to Tronox/Trospen Communications?

Kathy Blaha
Public Information Officer
City of Henderson | Communications and Council Support
702-267-2052 | Kathy.Blaha@cityofhenderson.com

Henderson Privilege Log Doc#5249

[illegible]



PUBLIC INFORMATION + MARKETING

WEEKLY REPORT

February 17, 2016

Current Records Requests

5

Five records of records from 11 records

Thursday, Dec. 17, 2015, Luke Knight of MacRae requested various information surrounding court times and fees. Mr. Knight was responded to and informed the information is being gathered. On Dec. 22, 2015, questions were sent to Mr. Knight asking for clarification of portions of the request. On Jan. 13, 2016 a letter dated Jan. 4 was received requesting different information. Mr. Knight has been asked to log into Carson Henderson to respond to questions. To date a response has not been received. On Feb. 4, 2016 the COA advised we log in now to the web 58 days after our last attempt to contact Mr. Knight.

On Jan. 13, 2016, Elizabeth Tinsler (as agent of Debra March's campaign) requested copies of Debra March.

Redaction

Redaction

A request for all emails exchanged between Mayor Hulse and @laryncolton from Nov. 1, 2015 was requested by Allan Chen of America Rising. We advised him there were no emails and the case was resolved.

A request from Adalinda Chen, NVSU was received asking for mobile food truck business license information from Jan. 3, 2008, to present.

Redaction


Redaction

On Feb. 4, Robert Fernald of NPSI requested copies of all internal emails from Jan. 1, 2014, to the present. All of these emails are available online and we waiting for final approval to respond as such.

On Oct. 27, 2015, Carl Rand, Orlando, FL wrote requesting a police report on the Chelsea Ales, Manager for the evening, of the Rejuvenate bar. He was advised that he would have to contact Las Vegas Metropolitan Police Department, since the incident did not occur in Henderson. This request was resolved on Oct. 27, 2015. On Feb. 2, 2016 we were contacted through Contact Henderson. He stated was advised that the incident occurred in Las Vegas Metropolitan Police Department's jurisdiction and to contact them for police reports.


2

DOC_0000051



PUBLIC INFORMATION • MARKETING
WEEKLY REPORT
 February 1-7, 2018

Current Marketing Campaigns




Heart & Soul
 A Celebration of Gospel and Black History
Saturday, February 27
 11am-5pm
 Henderson Inn 1001 1st Street
 (Concessionary Admission)
 African American art and story
 Live gospel performances
 Ethnic dance performances
 Food & beverages | Merchandise

cityshenderson.com | 702-267-5171



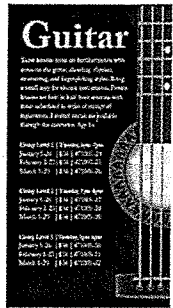
Heart & Soul
 A Celebration of Gospel and Black History
ENTERTAINMENT
 Variety Musicians
 Gospel Choirs and Quartets
 Soulful and Blues
 Community Gospel Choirs Choir
 Mount Zion Baptist Church Choir
 High School Church Choir
 Young Entrepreneur
 of Performing Arts and Comedy
 Present and Future to be presented
 Live! 2018
 Bishop's Bishop's Bishop's Choir
 Rock & Rollers
 Artists

cityshenderson.com | 702-267-5171



PUBLIC INFORMATION & MARKETING
WEEKLY REPORT
 February 1-7, 2016

Current Marketing Campaigns



Guitar

Learn basic skills on fretboard with...
 ...and a list of classes.

**ABSOLUTELY
ABS & CORE**


Get a workout and learn core...
 ...and a list of classes.

**Monday and Wednesday,
7pm-7:30pm**

January 4-27
 219.361.221, 949.241.21


February 1-24
 516.101.221, 949.241

February 29-March 30
 521.221, 949.241



PADI

...and a list of classes.

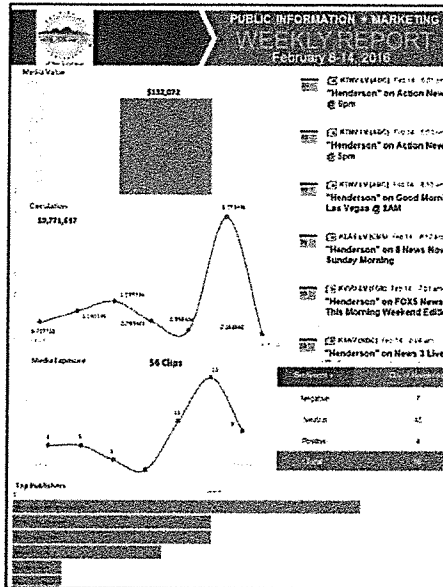


PADI

...and a list of classes.

PUBLIC INFORMATION + MARKETING WEEKLY REPORT February 1-7, 2016	
Marketing Report	
Marketing Campaigns	
Campaigns This Week	28
Campaigns YTD 2016	215
Marketing Collateral Produced	
Collateral Projects This Week	16
Collateral Produced This Week	14,265
Highlights: A media advisory was distributed for "Mayor Andy Hufnagel Presert Henderson State of the City Address." CHS, S. A. 13 were contacted to pitch their attendance and provide them with highlights. Received 150% from Nevada Business Press, Las Vegas Sun, News, Tribune, Reporter News. Four interviews with Mayor Hufnagel were coordinated and 1 interview with Burrell Coffee at the event.	

Henderson Privilege Log Doc#5253





PUBLIC INFORMATION - MARKETING
WEEKLY REPORT
February 8-14, 2016

Current Records Requests

4

Page 4 of 4 - 1/11/16
Print | Email | Share

Thursday, Dec. 17, 2015, Liana Knight of MacKenzie requested various information surrounding court fees and fees. Mr. Knight was responded to and informed the information is being gathered. On Dec. 30, 2015, questions were sent to Mr. Knight asking for clarification of portions of the request. On Jan. 13, 2016 a letter dated Jan. 4 was received requesting different information. Mr. Knight has been asked to log her contact Henderson to respond to questions. To date a response has not been received.

Redaction
On Jan. 13, 2016, Elizabeth Trepanier (on behalf of Debra Marsh's campaign) requested photos of Debra Marsh.

Redaction
Request from Adelaide Chen. TVU was received asking for mobile food truck business license information from Jan. 1, 2008 to present.

Redaction **Redaction**

On Feb. 4, Robert Forney of NYS requested copies of all internal audits from Jan. 1, 2014 to the present. All of these audits are available online and are waiting for final approval to respond as such.

Redaction **Redaction**

Citizen Unlabeled, NYS requested record over information for Josh Reid and Cheryl Neustadt from Jan. 1, 2015 thru Feb. 16, 2016. Purchasing is gathering all of the information. We expect to receive it today.

NYS submitted their annual salary request for the 2015 salaries for all City employees. Finance is gathering the information.



PUBLIC INFORMATION + MARKETING
WEEKLY REPORT
 February 8-14, 2016

Current Marketing Campaigns

Youth BOOT CAMP

Give the kids a head start on their educational opportunity for youth. A reading of motivation, drama, public safety, and positive reinforcement will be the focus of this program. Students will receive a certificate of completion. A limited number of spots are available.

Monday and Wednesday
 9:00am - 11:00am
 January 11-13, 15, 17, 19, 22, 24
 February 1, 3, 5, 7, 9, 12, 14, 16, 18, 20, 22, 24
 Drop-in fee \$5



Houston Public Library - Central
 11111 28th Street, Houston, TX 77057
 713.259.1234


100% ESPAÑOL

INTERMEDIATE SPANISH

Students continue to learn Spanish grammar concepts and focus on more detailed conversation. Expect 90 percent Spanish and 10 percent English spoken in class.


WEDNESDAY, 6:30PM-8PM
 January 11-17 (443.50) (44108-1-18)
 February 1-7 (443.50) (44108-1-18)
 March 1-7 (443.50) (44108-1-18)

Houston Public Library - Central
 11111 28th Street, Houston, TX 77057
 713.259.1234




PUBLIC INFORMATION + MARKETING
WEEKLY REPORT
 February 8-14, 2016




Current Marketing Campaigns



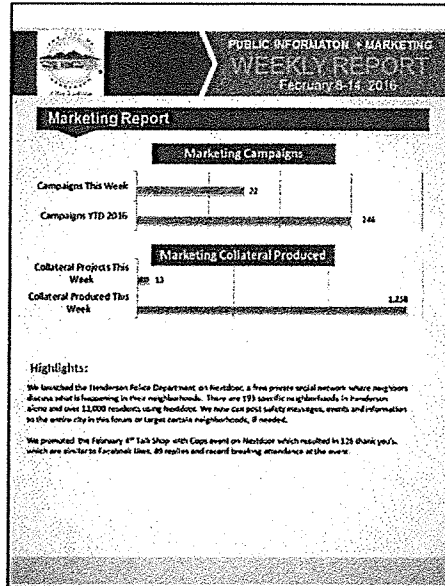
Henderson Fire Department
Open House

Meet your neighborhood firefighters,
 get a closer look at firefighting
 apparatus and tour the station.
 February 20 | 2:00pm-4:00pm
 Station 99 | 2401 Atchley Dr.




cityofhenderson.com | 702-267-2222 |   

Schedule subject to change without notice. For more information, please call 702-267-2222.



Henderson Privilege Log Doc#5695



PUBLIC INFORMATION + MARKETING

WEEKLY REPORT

Feb. 1-7, 2016

Current Records Requests

4

The number of new records received

Thursday, Dec. 17, 2015, Lukas Knight of MacRock requested various information surrounding court fines and fees. Mr. Knight was responded to and informed the information is being gathered. On Dec. 30, 2015, questions were sent to Mr. Knight asking for clarification of portions of the requests. On Jan. 15, 2016 a letter dated Jan. 15 was received requesting deferred information. Mr. Knight has been asked to bring back contact information to respond to questions. To date a response has not been received. On Feb. 4, 2016, the CAD administratoring a note in the case 15 days after our last attempt to contact Mr. Knight.

On Jan. 13, 2016, Elizabeth Tenorio, on behalf of the Delta March campaign, requested photos of Delta March.

Redaction

Redaction

A request from Adelaide Chen, (V2) was received asking for mobile food truck business income information from Jan. 1, 2009, to present.

Redaction


Redaction

On Feb. 4, Robert Feltner of WFO requested copies of all internal audits from Jan. 1, 2014, to the present. All audits are available online; we are waiting for final approval to respond as such.

Enclosure This Report Accomps:

Alan W. Brown of America Rising requested all emails exchanged between Mayor Paul Vance and @Chalcedee from beginning Nov. 1, 2015. On Feb. 4 he was advised there were no emails and the case was resolved.

On Oct. 27, 2015, Curt Reed, Orlando, Fla. made a requested a police report on Chelise Mae, evening manager of the Republique Spa. He was advised that he would have to contact Las Vegas Metropolitan Police Department. When the incident did not occur in Henderson. This request was resolved Oct. 27, 2015. On Feb. 2, 2016, Mr. Reed submitted a Corbett Henderson also requesting the same information. Records advised that the incident occurred in the Las Vegas Metropolitan Police Department jurisdiction and to contact them for police reports.





PUBLIC INFORMATION + MARKETING


WEEKLY REPORT

Feb. 1-7, 2016

Current Marketing Campaigns







PUBLIC INFORMATION + MARKETING
WEEKLY REPORT
 Feb. 1-7, 2015

Current Marketing Campaigns

Guitar

Three levels from an introduction with guitar to the guitar, playing, electric, acoustic, and lap steel guitar. This course is designed for students who have no prior experience. The course is designed to be a fun and interactive experience. The course is designed to be a fun and interactive experience. The course is designed to be a fun and interactive experience.

Group Level 1: Introduction to Guitar
 January 13-14 | 10:00-12:00 PM
 Address: 2015 Larkin St. | 415.398.1234
 March 13-14 | 10:00-12:00 PM


Group Level 2: Intermediate Guitar
 January 20-21 | 10:00-12:00 PM
 Address: 2015 Larkin St. | 415.398.1234
 March 20-21 | 10:00-12:00 PM

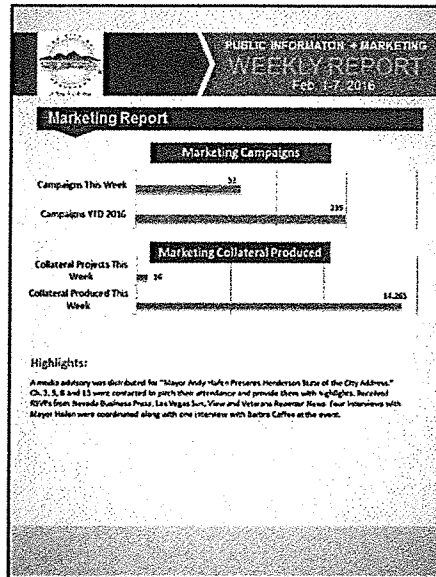
Group Level 3: Advanced Guitar
 January 27-28 | 10:00-12:00 PM
 Address: 2015 Larkin St. | 415.398.1234
 March 27-28 | 10:00-12:00 PM

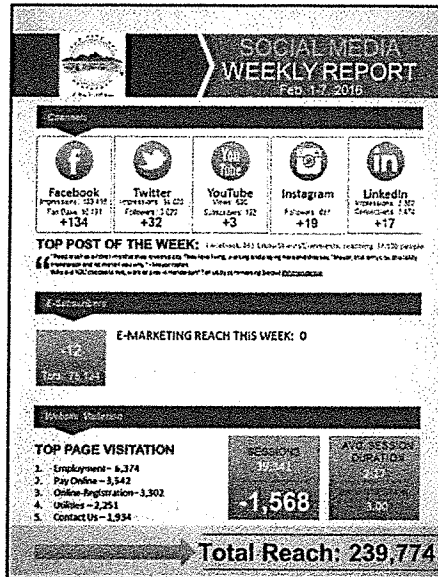
ABSOLUTELY ABS & CORE

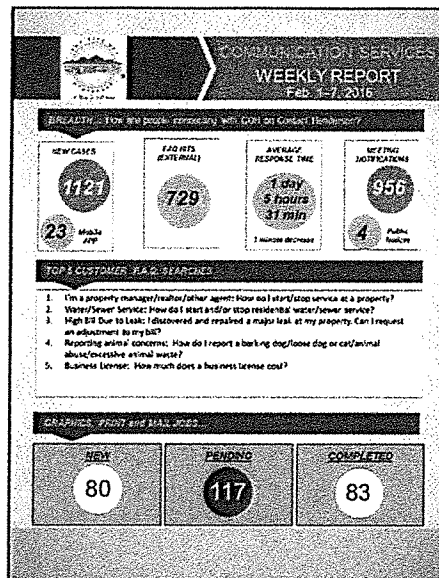
Get a leg up on your core and abs with this workout. It's a fun and interactive experience. The course is designed to be a fun and interactive experience. The course is designed to be a fun and interactive experience. The course is designed to be a fun and interactive experience.

Monday and Wednesday, 7pm-7:30pm
 January 4-5
 January 11-12
 January 18-19
 January 25-26
 February 1-2
 February 8-9
 February 15-16
 February 22-23
 February 29-March 30









Henderson Privilege Log Doc#7009

From: Luke Fritz [Luke.Fritz@cityofhenderson.com]
Sent: Monday, February 22, 2016 9:56 AM
To: Kristina Gilmore
CC: Laura Kopanski
Subject: FW: Trosper Communications
Attachments: Trosper Communications Agreement.docx

Redaction

Luke Fritz | Sr. Purchasing Specialist
City of Henderson | Finance Department
240 Water Street, Henderson, NV 89015
Phone: (702) 267-1717

From: Laura Kopanski
Sent: Thursday, February 18, 2016 4:00 PM
To: Luke Fritz
Subject: RE: Trosper Communications

See attached from Kristina Gilmore.

Laura Kopanski | Senior Legal Assistant
Henderson City Attorney's Office - Civil Division
240 Water Street, MSC 144
Henderson, Nevada 89015
Phone: (702) 267-1239 | Fax: (702) 267-1201
Laura.Kopanski@cityofhenderson.com
Office Hours: Monday - Thursday 7:30 a.m. to 5:30 p.m.

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From: Luke Fritz
Sent: Thursday, February 18, 2016 3:44 PM
To: Laura Kopanski
Subject: FW: Trosper Communications

Hi Laura,
I just wanted to check the status of the form I had sent you? I can't finish the Agreement without it.

Thank you,

Luke Fritz | Sr. Purchasing Specialist
City of Henderson | Finance Department
240 Water Street, Henderson, NV 89015
Phone: (702) 267-1717

From: Luke Fritz
Sent: Tuesday, February 16, 2016 9:30 AM
To: Laura Kopanski
Subject: RE: Trosper Communications

Hi Laura,
I can get started, but I will need you to please return the attached form to me as well.

Thank you,

Luke Fritz | Sr. Purchasing Specialist
City of Henderson | Finance Department
240 Water Street, Henderson, NV 89015
Phone: (702) 267-1717

From: Laura Kopanski
Sent: Thursday, February 11, 2016 5:00 PM
To: Luke Fritz
Subject: Trosper Communications

Luke,
Please place this in our standard purchasing agreement. Thank you.

Laura Kopanski | Senior Legal Assistant
Henderson City Attorney's Office - Civil Division
240 Water Street, MSC 144
Henderson, Nevada 89015
Phone: (702) 267-1239 | Fax: (702) 267-1201
Laura.Kopanski@cityofhenderson.com
Office Hours: Monday - Thursday 7:30 a.m. to 5:30 p.m.

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Henderson Privilege Log Doc#12328

From: Sally Galati [Sally.Galati@cityofhenderson.com]
Sent: Thursday, September 15, 2016 7:26 PM
To: Rory Robinson
Subject: FW: Media Communications for September 15, 2016

Redaction

LVRJ – Upcoming agenda items

Natalie Bruzda with the Review-Journal called seeking information on two upcoming agenda items. The first was NB 46, the item on the agreement between the City and Marnell Properties that would provide funding for a feasibility study for development on 55 acres located at St. Rose and Executive Airport Drive. I worked with Assistant City Manager Greg Blackburn to develop responses to Natalie's questions about the City's vision for what type of development it was seeking at that location, the specific provisions of the agreement and how it would be executed if approved. The second agenda item discussed was PH 40 on the City's 2015-2016 CAPER and approval for the report to be sent to the Department of Housing and Urban Development (HUD). Information was provided on the agenda item satisfying the HUD requirement for annual reporting related to Community Development Block Grant funding. Both stories are contingent on Council action at the September 20 meeting.

David Cherry

From: Office of Public Affairs [mailto:Keith.Paul=cityofhenderson.com@mail234.suw14.mcdlv.net] **On Behalf Of** Office of Public Affairs
Sent: Thursday, September 15, 2016 6:49 PM
To: Sally Galati
Subject: Media Communications for September 15, 2016

September 15, 2016

KXNT – Young Entrepreneurs Alliance

Fred Halstied, a reporter with KXNT radio, contacted the PIO Thursday following up on the press release send out regarding the City of Henderson's Young Entrepreneurs Alliance. I did an interview with Fred explaining that high school students are invited to the launch of this year's Young Entrepreneurs Alliance on Monday at the Convention Center. The aim of the program is to foster the students' business initiatives and inspire other teens to develop their

own ideas. The story is expected to run during newsbreaks on Friday.

Keith Paul



Ch 5 – Missing teen

Matt from the news desk called for a status check in the case of a 16-year-old girl reported missing on Sept. 14, 2015. Ch 5 ran a story based on information from the National Center for Missing Children and a person claiming to be her responded on social media that she wasn't missing. I confirmed that she is still listed as missing and detectives continue to work the case. Matt asked whether we've attempted to contact the person on social media; I told him that I could not discuss details about an open investigation. It is unclear whether a story will run.

Kathleen Richards

LVRJ – Trosper Communications contract

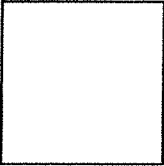
Natalie Bruzda with the R-J called seeking a copy of the city's contract with Trosper Communications. She also spoke with the Mayor and Councilman Marz. City Manager provided Natalie with a written quote in response to her inquiry. Natalie originally said she was going to request budget information for the communications department and staff, but withdrew the request. The story is likely to appear as early as Friday.

David Cherry

LVRJ – Upcoming agenda items

Natalie Bruzda with the Review-Journal called seeking information on two upcoming agenda items. The first was NB 46, the item on the agreement between the City and Mamell Properties that would provide funding for a feasibility study for development on 55 acres located at St. Rose and Executive Airport Drive. I worked with Assistant City Manager Greg Blackburn to develop responses to Natalie's questions about the City's vision for what type of development it was seeking at that location, the specific provisions of the agreement and how it would be executed if approved. The second agenda item discussed was PH 40 on the City's 2015-2016 CAPER and approval for the report to be sent to the Department of Housing and Urban Development (HUD). Information was provided on the agenda item satisfying the HUD requirement for annual reporting related to Community Development Block Grant funding. Both stories are contingent on Council action at the September 20 meeting.

David Cherry



This email was sent to sally.galati@cityofhenderson.com
[why did I get this?](#) [unsubscribe from this list](#) [update subscription preferences](#)
City of Henderson Office of Public Affairs · 240 S. Water Street · Henderson, NV 89015 · USA

Henderson Privilege Log Doc#13422

From: Kim Becker [Kim.Becker@cityofhenderson.com]
Sent: Monday, October 10, 2016 1:33 PM
To: David Cherry; Javier Trujillo
CC: Corey Clark
Subject: Senior Transportation Forum: Trosper/FRI

Importance: High

Hi David and Javier-

Liz Trosper has been in touch with Corey Clark regarding the Oct. 13 senior transportation forum. Initially a group was going to be there to talk about FRI and its benefits,

Redaction	Redaction
-----------	-----------

Redaction

. However, Liz Trosper told Corey that David gave permission for her to copy the FRI article that's in the summer issue of Henderson Happenings, that she could put the city logo on it and distribute copies at the forum.

Can you confirm that permission has been given for this? Normally we would not do something like that, but I'll leave it up to you. My department cannot advocate for or against FRI, so if permission has been granted for Liz to do this please respond ASAP and let us know. We just want to confirm that you gave permission for this (or not).

Thank you,
Kim

Kim Becker
Public Information Officer
City of Henderson
Public Works, Parks and Recreation Department
240 Water St. P.O. Box 95050
Henderson, NV 89009-5050
702-267-4033

Henderson Privilege Log Doc#13423

From: Kim Becker [Kim.Becker@cityofhenderson.com]
Sent: Monday, October 10, 2016 1:34 PM
To: Shari Ferguson; Adam Blackmore
Subject: FW: Senior Transportation Forum: Trosper/FRI

Importance: High

FYI

From: Kim Becker
Sent: Monday, October 10, 2016 1:33 PM
To: David Cherry; Javier Trujillo
Cc: Corey Clark
Subject: Senior Transportation Forum: Trosper/FRI
Importance: High

Hi David and Javier-

Liz Trosper has been in touch with Corey Clark regarding the Oct. 13 senior transportation forum. Initially a group was going to be there to talk about FRI and its benefits,

Redaction

Redaction

Redaction

However, Liz Trosper told Corey that David gave permission for her to copy the FRI article that's in the summer issue of Henderson Happenings, that she could put the city logo on it and distribute copies at the forum.

Can you confirm that permission has been given for this? Normally we would not do something like that, but I'll leave it up to you. My department cannot advocate for or against FRI, so if permission has been granted for Liz to do this please respond ASAP and let us know. We just want to confirm that you gave permission for this (or not).

Thank you,
Kim

Kim Becker
Public Information Officer
City of Henderson
Public Works, Parks and Recreation Department
240 Water St. P.O. Box 95050
Henderson, NV 89009-5050
702-267-4033

Henderson Privilege Log Doc#13425

From: Adam Blackmore [Adam.Blackmore@cityofhenderson.com]
Sent: Monday, October 10, 2016 1:35 PM
To: Corey Clark
Subject: RE: Senior Transportation Forum: Trosper/FRI

interesting

Adam Blackmore, CPRP
Recreation Superintendent
Public Works, Parks and Recreation
240 Water Street
P.O. Box 95050 MSC 131
Henderson, NV 89009
702-267-4018

From: Corey Clark
Sent: Monday, October 10, 2016 1:35 PM
To: Adam Blackmore
Subject: FW: Senior Transportation Forum: Trosper/FRI
Importance: High

FYI.

From: Kim Becker
Sent: Monday, October 10, 2016 1:33 PM
To: David Cherry; Javier Trujillo
Cc: Corey Clark
Subject: Senior Transportation Forum: Trosper/FRI
Importance: High

Hi David and Javier-

Liz Trosper has been in touch with Corey Clark regarding the Oct. 13 senior transportation forum.
~~Initially a group was going to be there to talk about FRI and its benefits~~

Redaction

Redaction

Redaction

However, Liz Trosper told Corey that David gave permission for her to copy the FRI article that's in the summer issue of Henderson Happenings, that she could put the city logo on it and distribute copies at the forum.

Can you confirm that permission has been given for this? Normally we would not do something like that, but I'll leave it up to you. My department cannot advocate for or against FRI, so if permission has been granted for Liz to do this please respond ASAP and let us know. We just want to confirm that you gave permission for this (or not).

Thank you,
Kim

Kim Becker
Public Information Officer
City of Henderson
Public Works, Parks and Recreation Department
240 Water St. P.O. Box 95050
Henderson, NV 89009-5050
702-267-4033

Henderson Privilege Log Doc#13428

From: Corey Clark [Corey.Clark@cityofhenderson.com]
Sent: Monday, October 10, 2016 1:41 PM
To: Kim Becker
Subject: RE: Senior Transportation Forum: Trospers/FRI

Thank You.

From: Kim Becker
Sent: Monday, October 10, 2016 1:41 PM
To: Corey Clark
Cc: Adam Blackmore; Shari Ferguson
Subject: FW: Senior Transportation Forum: Trospers/FRI
Importance: High

Javier just called. He said since the article had already been published it's okay. So....okay per Javier.

From: Kim Becker
Sent: Monday, October 10, 2016 1:33 PM
To: David Cherry; Javier Trujillo
Cc: Corey Clark
Subject: Senior Transportation Forum: Trospers/FRI
Importance: High

Hi David and Javier-

Liz Trospers has been in touch with Corey Clark regarding the Oct. 13 senior transportation forum. Initially a group was going to be there to talk about FRI and its benefits,

Redaction
Redaction

So neither group will be advocating at the event. However, Liz Trospers told Corey that David gave permission for her to copy the FRI article that's in the summer issue of Henderson Happenings, that she could put the city logo on it and distribute copies at the forum.

Can you confirm that permission has been given for this? Normally we would not do something like that, but I'll leave it up to you. My department cannot advocate for or against FRI, so if permission has been granted for Liz to do this please respond ASAP and let us know. We just want to confirm that you gave permission for this (or not).

Thank you,
Kim

Kim Becker
Public Information Officer
City of Henderson
Public Works, Parks and Recreation Department

240 Water St. P.O. Box 95050
Henderson, NV 89009-5050
702-267-4033

EXHIBIT 3

NEOJ
JOSH M. REID, City Attorney
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Josh.Reid@cityofhenderson.com

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Las Vegas, Nevada 89148-1302
Telephone: 702.562.8820
Facsimile: 702.562.8821
DKennedy@BaileyKennedy.com

Attorneys for Respondent
CITY OF HENDERSON

DISTRICT COURT
CLARK COUNTY, NEVADA

LAS VEGAS REVIEW-JOURNAL,

Petitioner,

vs.

CITY OF HENDERSON,

Respondent.

Case No. A-16-747289-W
Dept. No. XVIII

NOTICE OF ENTRY OF ORDER

PLEASE TAKE NOTICE that an Order denying Petitioner’s request for a writ of mandamus, injunctive relief, and declaratory relief, and any remaining request for relief in the Amended Petition was entered on May 12, 2017.

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A true and correct copy is attached.

DATED this 15th day of May, 2017.

BAILEY❖KENNEDY

By: /s/ Dennis L. Kennedy
DENNIS L. KENNEDY

and

JOSH M. REID, City Attorney
Nevada Bar No. 7497
CITY OF HENDERSON
240 Water Street, MSC 144
Henderson, NV 89015

Attorneys for Respondent
CITY OF HENDERSON

CERTIFICATE OF SERVICE

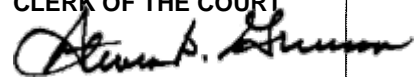
I certify that I am an employee of BAILEY ♦ KENNEDY and that on the 15th day of May, 2017, service of the foregoing **NOTICE OF ENTRY OF ORDER** was made by mandatory electronic service through the Eighth Judicial District Court’s electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

MARGARET A. MCLETCHE	Email: Alina@nvlitigation.com
ALINA M. SHELL	Maggie@nvlitigation.com
MCLETCHE SHELL LLC	
701 East Bridger Avenue, Suite 520	<i>Attorneys for Petitioner</i>
Las Vegas, Nevada 89101	LAS VEGAS REVIEW-JOURNAL

/s/ Josephine Baltazar
Employee of BAILEY ♦ KENNEDY

ORIGINAL

Electronically Filed
5/12/2017 2:54 PM
Steven D. Grierson
CLERK OF THE COURT



ORDR

JOSH M. REID, City Attorney
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Henderson, Nevada 89015
Telephone: 702.267.1200
Facsimile: 702.267.1201
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DKennedy@BaileyKennedy.com

Attorneys for Respondent
CITY OF HENDERSON

DISTRICT COURT
CLARK COUNTY, NEVADA

LAS VEGAS REVIEW-JOURNAL,

Petitioner,

vs.

CITY OF HENDERSON,

Respondent.

Case No. A-16-747289-W
Dept. No. XVIII

ORDER

The Amended Public Records Act Application/Petition for Writ of Mandamus/Application for Declaratory Relief (the "Petition") of Petitioner Las Vegas Review Journal (the "LVRJ") came on for hearing at 9:00 a.m. on March 30, 2017 on expedited basis pursuant to NRS 239.011; the LVRJ was represented by Alina Shell and Margaret A. McLetchie; Respondent City of Henderson (the "City") was represented by Dennis L. Kennedy of Bailey ♦ Kennedy, City Attorney Josh M. Reid and Assistant City Attorney Brian R. Reeve; the Court having read the pleadings and memoranda filed by the parties, having considered the evidence presented and having heard the argument of counsel, hereby ORDERS AS FOLLOWS:

1 1. The Petition presents three principal issues: (i) preparation and access to public
2 records; (ii) assessing costs and charging fees for copying and preparing public records; and (iii)
3 withholding and redacting certain records.

4 2. Preparation and Access to Records. In response to the LVRJ's public record request,
5 the City performed a search that returned 9,621 electronic files consisting of 69,979 pages of
6 documents. Except for the items identified on the City's withholding log (discussed in paragraph 4,
7 below), all such files and documents (the "Prepared Documents") were prepared by the City, and
8 LVRJ had access to and inspected the Prepared Documents prior to the hearing. Following its
9 inspection, LVRJ made no request for copies of the Prepared Documents; however, following
10 LVRJ's counsel's representations at the hearing that it also wanted electronic copies of the Prepared
11 Documents, the City agreed to provide electronic copies of the Prepared Documents. The City has
12 complied with its obligations under the Nevada Public Records Act (the "NPRA").

13 3. Costs and Fees. The City has provided the Prepared Documents without charging
14 costs or fees to the LVRJ. Therefore, LVRJ's claims regarding the propriety of charging such costs
15 and fees are moot, and the Court does not decide them.

16 4. Withheld Documents. The sole issue decided by the Court concerns certain
17 documents the City withheld and/or redacted (the "Withheld Documents") on the grounds of
18 attorney-client or deliberative process privilege. The operative privilege log (the "Privilege Log")
19 was attached as Exhibit "H" to the City's Response to the Petition. The Court finds the Privilege
20 Log to be timely, sufficient and in compliance with the requirements of the NPRA, and therefore
21 DENIES the LVRJ's Amended Petition concerning the Withheld Documents.

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5. CONCLUSION. Based on the foregoing, LVRJ's request for a writ of mandamus, injunctive relief, and declaratory relief, and any remaining request for relief in the Amended Petition is hereby DENIED.

DATED this ____ day of April, 2017.



Submitted by:

Approved as to Form and Content:

BAILEY ♦ KENNEDY

MCLETCHIE SHELL LLC

By: 

DENNIS L. KENNEDY

By: _____

ALINA SHELL
MARGARET A. MCLETCHIE

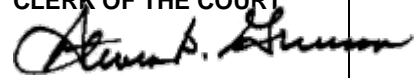
and

JOSH M. REID, City Attorney
CITY OF HENDERSON

Attorneys for Petitioner
LAS VEGAS REVIEW JOURNAL

Attorneys for Respondent
CITY OF HENDERSON

EXHIBIT 4



NEOJ
JOSH M. REID, City Attorney
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Attorneys for Respondent
CITY OF HENDERSON

DISTRICT COURT
CLARK COUNTY, NEVADA

LAS VEGAS REVIEW-JOURNAL,

Petitioner,

vs.

CITY OF HENDERSON,

Respondent.

Case No. A-16-747289-W
Dept. No. XVIII

NOTICE OF ENTRY OF ORDER

PLEASE TAKE NOTICE that an Order regarding Attorneys' Fees and Costs of Petitioner
Las Vegas Review Journal was entered on February 15, 2018.

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1 A true and correct copy is attached.

2 DATED this 15th day of February, 2018.

3 BAILEY❖KENNEDY

4
5 By: /s/ Dennis L. Kennedy
6 DENNIS L. KENNEDY

7 and

8 JOSH M. REID, City Attorney
9 Nevada Bar No. 7497
10 **CITY OF HENDERSON**
11 240 Water Street, MSC 144
12 Henderson, NV 89015

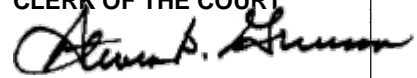
13 *Attorneys for Respondent*
14 **CITY OF HENDERSON**
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CERTIFICATE OF SERVICE

I certify that I am an employee of BAILEY ♦ KENNEDY and that on the 15th day of February, 2018, service of the foregoing **NOTICE OF ENTRY OF ORDER** was made by mandatory electronic service through the Eighth Judicial District Court’s electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

MARGARET A. MCLETCHE	Email: Alina@nvlitigation.com
ALINA M. SHELL	Maggie@nvlitigation.com
MCLETCHE SHELL LLC	
701 East Bridger Avenue, Suite 520	<i>Attorneys for Petitioner</i>
Las Vegas, Nevada 89101	LAS VEGAS REVIEW-JOURNAL

/s/ Susan Russo
Employee of BAILEY ♦ KENNEDY



ORDR

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Attorneys for Respondent
CITY OF HENDERSON

DISTRICT COURT
CLARK COUNTY, NEVADA

LAS VEGAS REVIEW-JOURNAL,

Petitioner,

vs.

CITY OF HENDERSON,

Respondent.

Case No. A-16-747289-W
Dept. No. XVIII

ORDER

The Motion for Attorney's Fees and Costs of Petitioner Las Vegas Review Journal (the "Review-Journal") came on for hearing at 9:00 a.m. on August 3, 2017, and for an additional hearing on August 10, 2017, the Honorable Mark B. Bailus presiding, the Review-Journal appearing by and through its counsel, Alina M. Shell, and Respondent City of Henderson ("Henderson"), appearing by and through Dennis L. Kennedy of Bailey Kennedy, City Attorney Josh M. Reid and Assistant City Attorney Brian R. Reeve, and the Court having read and considered all of the papers and pleadings on file, and having heard the argument of counsel, hereby makes the following findings of fact and conclusions of law:

1 1. On June 1, 2017, the Review-Journal filed a Motion for Attorney's Fees and Costs
2 pursuant to Nev. Rev. Stat. § 239.011(2). In total, the Review-Journal requested \$30,931.50 in
3 attorney's fees, and \$902.84 in costs.

4 2. In its Motion and supporting exhibits the Review-Journal requested compensation at
5 the following rates for the work performed by its attorneys and support staff:

Attorney/Biller	Hours	Billing Rate	Total Billed
Margaret A. McLetchie	38.20	\$450.00	\$16,434.00
Alina M. Shell	37.60	\$300.00	\$11,280.00
Gabriel Czop	15.70	\$125.00	\$1,962.50
Pharan Burchfield	5.80	\$100.00	\$580.00

11
12 3. Henderson filed an Opposition to the Review-Journal's Motion on July 10, 2017,
13 and the Review-Journal filed a Reply on July 27, 2017.

14 4. In its Opposition, Henderson asserted the Review-Journal was not the prevailing
15 party in this matter, and even if it was, requested this Court reduce any award of fees and costs to
16 compensate the Review-Journal for only the work its attorneys performed on the original NPRS
17 petition. Henderson also disputed various line items contained in the Review-Journal's attorneys'
18 bills. Henderson did not, however, dispute the billing rates for the Review-Journal's attorneys or
19 their support staff.

20 5. Henderson also asserted that pursuant to Nev. Rev. Stat. § 239.012—a provision of
21 the NPRA which provides immunity from damages for public officials who act in good faith in
22 disclosing or refusing to disclose information—the Review-Journal had to establish Henderson
23 acted in bad faith in refusing to disclose the requested records to obtain attorney's fees and costs.

24 6. This Court conducted a hearing on the Review-Journal's Motion for Attorney's Fees
25 and Costs on August 3, 2017. After hearing argument from counsel, the Court took the matter under
26 consideration, and conducted an additional hearing on August 10, 2017.

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ORDER

7. Recovery of attorney's fees as a cost of litigation is permissible by agreement, statute, or rule. *See Sandy Valley Assocs. v. Sky Ranch Estates Owners Ass'n*, 117 Nev. 948, 956, 35 P.3d 964, 969 (2001).

8. Recovery of attorney's fees is authorized by the NPRA, which provides in pertinent part that "...[i]f the requester prevails [on a petition for public records], the requester is entitled to recover his or her costs and reasonable attorney's fees in the proceeding from the governmental entity whose officer has custody of the book or record." Nev. Rev. Stat. § 239.011(2).

9. The Nevada Supreme Court has explained that "...by its plain meaning, [the NPRA] grants a requester who prevails in NPRA litigation the right to recover attorney fees and costs, without regard to whether the requester is to bear the costs of production." *LVMPD v. Blackjack Bonding*, 131 Nev. Adv. Op. 10, 343 P.3d 608, 615 (2015), *reh'g denied* (May 29, 2015), *reconsideration en banc denied* (July 6, 2015).

10. A party "prevails" for the purposes of Nev. Rev. Stat. § 239.011(2) if "it succeeds on any significant issue in litigation which achieves some of the benefit it sought in bringing suit." *Valley Elec. Ass'n v. Overfield*, 121 Nev. 7, 10, 106 P.3d 1198, 1200 (2005) (emphasis added) (internal quotations omitted); *accord Blackjack Bonding*, 131 Nev. Adv. Op. 10, 343 P.3d 608, 615.

11. To be a prevailing party, a party need not succeed on every issue. *See Hensley v. Eckerhart*, 461 U.S. 424, 434, 103 S. Ct. 1933, 76 L.Ed.2d 40 (1983); *accord Blackjack Bonding*, 131 Nev. Adv. Op. 10, 343 P.3d 608, 615.

12. In Nevada, "the method upon which a reasonable fee is determined is subject to the discretion of the court," which "is tempered only by reason and fairness." *Shuette v. Beazer Homes Holding Corp.*, 121 Nev. 837, 864, 124 P.3d 530, 548-49 (2005). "[I]n determining the amount of fees to award, the court is not limited to one specific approach; its analysis may begin with any method rationally designed to calculate a reasonable amount, including those based on a 'lodestar' amount or a contingency fee." *Id.*

13. "Whichever method is chosen as a starting point, however, the court must continue its analysis by considering the requested amount in light of the factors" announced by the Nevada

1 Supreme Court in *Brunzell v. Golden Gate Nat. Bank*, 85 Nev. 345, 455 P.2d 31 (1969). *Id.* at 865.

2 Pursuant to *Brunzell*, a court must consider four elements in determining the reasonable value of
3 attorneys' services:

4 (1) the qualities of the advocate: his ability, his training, education, experience,
5 professional standing and skill; (2) the character of the work to be done: its difficulty,
6 its intricacy, its importance, time and skill required, the responsibility imposed and the
7 prominence and character of the parties where they affect the importance of the
litigation; (3) the work actually performed by the lawyer: the skill, time and attention
given to the work; (4) the result: whether the attorney was successful and what
benefits were derived.

8 *Brunzell*, 85 Nev. at 349, 455 P.2d at 33 (citation omitted); *accord Shuette v. Beazer Homes*
9 *Holding Corp.*, 121 Nev. 837, 864-65, 124 P.3d 530, 548-49 (2005).

10 14. Although the Review-Journal did not prevail on the claims for relief set forth in its
11 Amended Petition, the Court finds the Review-Journal is nevertheless a prevailing party because it
12 was able to obtain copies of the records it requested after initiating this action.

13 15. Thus, the Court finds that the Review-Journal is the prevailing party in this matter as
14 to its request for the records and therefore is entitled to attorney's fees and costs.

15 16. Having reviewed the papers and pleadings filed herein, including the documentation
16 provided by the Review-Journal regarding the work performed by its counsel and support staff, and
17 having considered the *Brunzell* factors, the Court finds the Review-Journal is entitled to an award of
18 attorney's fees in the amount of \$9,010.00, based on the hourly rates set forth on its Motion for
19 Attorney's Fees and Costs, and the work performed in this matter.

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17. The Court further finds the Review-Journal is entitled to \$902.84 in costs, resulting in a total award of \$9,912.84.

IT IS SO ORDERED this 8 day of FEBRUARY, ²⁰¹⁸~~2017~~.


HONORABLE MARK B. BAILUS
DISTRICT COURT JUDGE

Submitted by:

BAILEY ♦ KENNEDY

By 

Dennis L. Kennedy, Nevada Bar No. 1462

Sarah P. Harmon, Nevada Bar No. 8106

Kelly B. Stout, Nevada Bar No. 12105

and

Josh M. Reid, Nevada Bar No. 7497

Brandon P. Kemble, Nevada Bar No. 11175

Brian R. Reeve, Nevada Bar No. 10197

CITY OF HENDERSON'S ATTORNEY OFFICE

Counsel for Respondent, City of Henderson

IN THE SUPREME COURT OF THE STATE OF NEVADA

INDICATE FULL CAPTION:

CITY OF HENDERSON,
Appellant,

vs.

LAS VEGAS REVIEW JOURNAL,
Respondent.

No. 75047

Electronically Filed
Apr 11 2018 12:21 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

**DOCKETING STATEMENT
CIVIL APPEALS**

GENERAL INFORMATION

Appellants must complete this docketing statement in compliance with NRAP 14(a). The purpose of the docketing statement is to assist the Supreme Court in screening jurisdiction, identifying issues on appeal, assessing presumptive assignment to the Court of Appeals under NRAP 17, scheduling cases for oral argument and settlement conferences, classifying cases for expedited treatment and assignment to the Court of Appeals, and compiling statistical information.

WARNING

This statement must be completed fully, accurately and on time. NRAP 14(c). The Supreme Court may impose sanctions on counsel or appellant if it appears that the information provided is incomplete or inaccurate. *Id.* Failure to fill out the statement completely or to file it in a timely manner constitutes grounds for the imposition of sanctions, including a fine and/or dismissal of the appeal.

A complete list of the documents that must be attached appears as Question 27 on this docketing statement. Failure to attach all required documents will result in the delay of your appeal and may result in the imposition of sanctions.

This court has noted that when attorneys do not take seriously their obligations under NRAP 14 to complete the docketing statement properly and conscientiously, they waste the valuable judicial resources of this court, making the imposition of sanctions appropriate. See KDI Sylvan Pools v. Workman, 107 Nev. 340, 344, 810 P.2d 1217, 1220 (1991). Please use tab dividers to separate any attached documents.

1. Judicial District Eighth Department XVIII

County Clark Judge Honorable Mark B. Bailus

District Ct. Case No. A-16-747289-W

2. Attorney filing this docketing statement:

Attorney Dennis L. Kennedy/Sarah E. Harmon Telephone 702-562-8820

Firm Bailey Kennedy

Address 8984 Spanish Ridge Avenue, Las Vegas, Nevada 89148-1302

(continued on attached sheet)

Client(s) City of Henderson

If this is a joint statement by multiple appellants, add the names and addresses of other counsel and the names of their clients on an additional sheet accompanied by a certification that they concur in the filing of this statement.

3. Attorney(s) representing respondents(s):

Attorney Margaret A. McLetchie/Alina M. Shell Telephone 702-728-5300

Firm McLetchie Shell LLC

Address 702 E. Bridger Avenue, Suite 520, Las Vegas, Nevada 89101

Client(s) Las Vegas Review Journal

Attorney _____ Telephone _____

Firm _____

Address _____

Client(s) _____

(List additional counsel on separate sheet if necessary)

4. Nature of disposition below (check all that apply):

- | | |
|---|---|
| <input type="checkbox"/> Judgment after bench trial | <input type="checkbox"/> Dismissal: |
| <input type="checkbox"/> Judgment after jury verdict | <input type="checkbox"/> Lack of jurisdiction |
| <input type="checkbox"/> Summary judgment | <input type="checkbox"/> Failure to state a claim |
| <input type="checkbox"/> Default judgment | <input type="checkbox"/> Failure to prosecute |
| <input type="checkbox"/> Grant/Denial of NRCP 60(b) relief | <input type="checkbox"/> Other (specify): _____ |
| <input type="checkbox"/> Grant/Denial of injunction | <input type="checkbox"/> Divorce Decree: |
| <input type="checkbox"/> Grant/Denial of declaratory relief | <input type="checkbox"/> Original <input type="checkbox"/> Modification |
| <input type="checkbox"/> Review of agency determination | <input checked="" type="checkbox"/> Other disposition (specify): <u>Order granting fees</u> |

5. Does this appeal raise issues concerning any of the following?

- ☐ Child Custody
- ☐ Venue
- ☐ Termination of parental rights

6. Pending and prior proceedings in this court. List the case name and docket number of all appeals or original proceedings presently or previously pending before this court which are related to this appeal:

Las Vegas Review Journal v. City of Henderson, Supreme Court Case No. 73287

7. Pending and prior proceedings in other courts. List the case name, number and court of all pending and prior proceedings in other courts which are related to this appeal (e.g., bankruptcy, consolidated or bifurcated proceedings) and their dates of disposition:

8. Nature of the action. Briefly describe the nature of the action and the result below:

This appeal seeks review of the district court's award of attorneys' fees and costs in the Las Vegas Review Journal's ("Review Journal") favor after the district court denied all of the Review Journal's underlying claims for relief against the City of Henderson ("Henderson").

On or about October 4, 2016, Henderson received a public records request from the Review Journal, asking for documents related to the public relations/communications firm Trospen Communications and its principal, Elizabeth Trospen. Because the Review Journal's request was broadly drafted, Henderson found approximately 5,566 responsive emails, containing additional electronic files, for a total of 69,979 pages matching the search terms set forth in the request. In light of the large universe of potentially responsive documents, and Henderson's responsibility to safeguard confidential information, Henderson explained the Request would require extraordinary research and use of Henderson's personnel to complete. Henderson provided the Review Journal with an estimate of costs.
(continued on attached sheet)

9. Issues on appeal. State concisely the principal issue(s) in this appeal (attach separate sheets as necessary):

Whether the district court erred in awarding the Review Journal a portion of its attorney's fee and costs when the district court denied all of the Review Journal's claims for relief and Henderson voluntarily agreed to give the Review Journal copies of the records it previously inspected free of charge.

10. Pending proceedings in this court raising the same or similar issues. If you are aware of any proceedings presently pending before this court which raises the same or similar issues raised in this appeal, list the case name and docket numbers and identify the same or similar issue raised:

The Review Journal has separately appealed the district court's decision to deny the Review Journal's petition and request for injunctive and declaratory relief. That appeal is currently pending before the Nevada Supreme Court under Case No. 73287. While the issues raised in that appeal are not the same or similar, they do bear on the instant appeal.

11. Constitutional issues. If this appeal challenges the constitutionality of a statute, and the state, any state agency, or any officer or employee thereof is not a party to this appeal, have you notified the clerk of this court and the attorney general in accordance with NRAP 44 and NRS 30.130?

☒ N/A

☐ Yes

☐ No

If not, explain:

12. Other issues. Does this appeal involve any of the following issues?

☐ Reversal of well-settled Nevada precedent (identify the case(s))

☐ An issue arising under the United States and/or Nevada Constitutions

☐ A substantial issue of first impression

☐ An issue of public policy

☐ An issue where en banc consideration is necessary to maintain uniformity of this court's decisions

☐ A ballot question

If so, explain:

13. Assignment to the Court of Appeals or retention in the Supreme Court. Briefly set forth whether the matter is presumptively retained by the Supreme Court or assigned to the Court of Appeals under NRAP 17, and cite the subparagraph(s) of the Rule under which the matter falls. If appellant believes that the Supreme Court should retain the case despite its presumptive assignment to the Court of Appeals, identify the specific issue(s) or circumstance(s) that warrant retaining the case, and include an explanation of their importance or significance:

This appeal is one that should presumptively be assigned to the Court of Appeals under NRAP 17(b)(8). However, the Review Journal requested that its related appeal of the denial of its Petition for Writ of Mandamus be heard by the Nevada Supreme Court pursuant to NRAP 17(a)(14). Because these appeals are related, Henderson requests that this appeal be heard by the same court that will hear the Review Journal's related appeal.

14. Trial. If this action proceeded to trial, how many days did the trial last? _____

Was it a bench or jury trial? N/A

15. Judicial Disqualification. Do you intend to file a motion to disqualify or have a justice recuse him/herself from participation in this appeal? If so, which Justice?
N/A

TIMELINESS OF NOTICE OF APPEAL

16. Date of entry of written judgment or order appealed from February 15, 2018

If no written judgment or order was filed in the district court, explain the basis for seeking appellate review:

17. Date written notice of entry of judgment or order was served February 15, 2018

Was service by:

☐ Delivery

☒ Mail/electronic/fax

18. If the time for filing the notice of appeal was tolled by a post-judgment motion (NRCP 50(b), 52(b), or 59)

(a) Specify the type of motion, the date and method of service of the motion, and the date of filing.

☐ NRCP 50(b) Date of filing _____

☐ NRCP 52(b) Date of filing _____

☐ NRCP 59 Date of filing _____

NOTE: Motions made pursuant to NRCP 60 or motions for rehearing or reconsideration may toll the time for filing a notice of appeal. See AA Primo Builders v. Washington, 126 Nev. ____, 245 P.3d 1190 (2010).

(b) Date of entry of written order resolving tolling motion _____

(c) Date written notice of entry of order resolving tolling motion was served _____

Was service by:

☐ Delivery

☐ Mail

19. Date notice of appeal filed March 16, 2018

If more than one party has appealed from the judgment or order, list the date each notice of appeal was filed and identify by name the party filing the notice of appeal: Henderson filed its notice of appeal from the district court's order granting the Review Journal a portion of its fees and costs on March 16, 2018.

The Review Journal filed its Notice of Cross-Appeal on March 26, 2018.

20. Specify statute or rule governing the time limit for filing the notice of appeal, e.g., NRAP 4(a) or other

NRAP 4(a)

SUBSTANTIVE APPEALABILITY

21. Specify the statute or other authority granting this court jurisdiction to review the judgment or order appealed from:

(a)

- | | |
|---|---------------------------------------|
| <input checked="" type="checkbox"/> NRAP 3A(b)(1) | <input type="checkbox"/> NRS 38.205 |
| <input type="checkbox"/> NRAP 3A(b)(2) | <input type="checkbox"/> NRS 233B.150 |
| <input type="checkbox"/> NRAP 3A(b)(3) | <input type="checkbox"/> NRS 703.376 |
| <input type="checkbox"/> Other (specify) _____ | |

(b) Explain how each authority provides a basis for appeal from the judgment or order:

The district court's order granting the Review Journal's motion for attorneys' fees and costs is the final order in the underlying action.

22. List all parties involved in the action or consolidated actions in the district court:

(a) Parties:

Las Vegas Review Journal, Petitioner

City of Henderson, Respondent

(b) If all parties in the district court are not parties to this appeal, explain in detail why those parties are not involved in this appeal, *e.g.*, formally dismissed, not served, or other:

N/A

23. Give a brief description (3 to 5 words) of each party's separate claims, counterclaims, cross-claims, or third-party claims and the date of formal disposition of each claim.

The Review Journal contended that Henderson violated the Nevada Public Records Act and sought a writ of mandamus compelling production of the requested documents. The district court denied the Review Journal's claims on May 15, 2017.

24. Did the judgment or order appealed from adjudicate ALL the claims alleged below and the rights and liabilities of ALL the parties to the action or consolidated actions below?

☒ Yes

☐ No

25. If you answered "No" to question 24, complete the following:

(a) Specify the claims remaining pending below:

(b) Specify the parties remaining below:

(c) Did the district court certify the judgment or order appealed from as a final judgment pursuant to NRCP 54(b)?

☐ Yes

☐ No

(d) Did the district court make an express determination, pursuant to NRCP 54(b), that there is no just reason for delay and an express direction for the entry of judgment?

☐ Yes

☐ No

26. If you answered "No" to any part of question 25, explain the basis for seeking appellate review (e.g., order is independently appealable under NRAP 3A(b)):

27. Attach file-stamped copies of the following documents:

- The latest-filed complaint, counterclaims, cross-claims, and third-party claims
- Any tolling motion(s) and order(s) resolving tolling motion(s)
- Orders of NRCP 41(a) dismissals formally resolving each claim, counterclaims, cross-claims and/or third-party claims asserted in the action or consolidated action below, even if not at issue on appeal
- Any other order challenged on appeal
- Notices of entry for each attached order

VERIFICATION

I declare under penalty of perjury that I have read this docketing statement, that the information provided in this docketing statement is true and complete to the best of my knowledge, information and belief, and that I have attached all required documents to this docketing statement.

City of Henderson

Name of appellant

4/11/2018

Date

Dennis L. Kennedy

Name of counsel of record



Signature of counsel of record

State of Nevada, County of Clark

State and county where signed

CERTIFICATE OF SERVICE

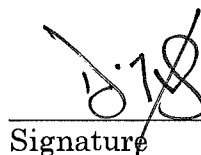
I certify that on the 11th day of April, 2018, I served a copy of this completed docketing statement upon all counsel of record:

☐ By personally serving it upon him/her; or

☒ By mailing it by first class mail with sufficient postage prepaid to the following address(es): (NOTE: If all names and addresses cannot fit below, please list names below and attach a separate sheet with the addresses.)

Margaret A. McLetchie, Esq.
Alina M. Shell, Esq.
McLetchie Shell LLC
701 East Bridger Avenue, Suite 520
Las Vegas, Nevada 89101

Dated this 11th day of April, 2018



Signature

EXHIBIT 1

2. Attorney filing this docketing statement (continued):

Attorney: Josh M. Reid, City Attorney

Telephone: 702-267-1200

Firm: City of Henderson

Address: 240 Water Street, MC 144, Henderson, Nevada 89015

Client(s): City of Henderson

8. Nature of the action (continued):

Henderson attempted to work with the Review Journal to find a resolution. Henderson offered to narrow the search terms to decrease the number of email hits (if the Review Journal was so inclined) in order to minimize costs. Despite Henderson's efforts, the Review Journal filed suit against Henderson on November 29, 2016, claiming Henderson had refused to provide the Review Journal with the requested records.

After this case was commenced, Henderson made all requested documents available to the Review Journal for inspection at City Hall free of charge. The Review Journal inspected the records over the span of several days and notably, during its review, never requested a single copy of any of the documents it reviewed.

On December 20, 2016, Henderson provided the Review Journal with an initial list of documents for which it was asserting confidentiality or privilege ("Withholding Log"). Henderson subsequently provided two updated versions of the Withholding Log. On February 28, 2017, the Review Journal filed an Amended Petition challenging the adequacy of the final Withholding Log.

On March 30, 2017, the district court heard argument on the Review Journal's Amended Petition and denied the Review Journal's Petition. Specifically, the district court ruled that Henderson had complied with its obligations under the Nevada Public Records Act, including providing the Review Journal with a timely and sufficient Withholding Log. Accordingly, the district court denied the Review Journal's request for writ of mandamus, injunctive relief, declaratory relief, and all requests for relief against Henderson.

Nonetheless, the Review Journal then filed a Motion for Attorney's Fees and Costs, arguing that it was a "prevailing party." The district court granted the Review Journal's request and awarded the Review Journal \$9,010.00 in fees and \$902.84 in costs on the basis that the Review Journal was a limited prevailing party because it obtained copies of the records that it had previously inspected free of charge upon request.

EXHIBIT 2

CLERK OF THE COURT

PET

MARGARET A. MCLEITCHIE, Nevada Bar No. 10931

ALINA M. SHELL, Nevada Bar No. 11711

MCLEITCHIE SHELL LLC

701 East Bridger Avenue, Suite. 520

Las Vegas, NV 89101

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Email: alina@nvlitigation.com

Counsel for Petitioner

**EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA**

LAS VEGAS REVIEW-JOURNAL,

Petitioner,

vs.

CITY OF HENDERSON,

Respondent.

Case No.: A-16-747289-W

Dept. No.: XVIII

**AMENDED PUBLIC RECORDS
ACT APPLICATION PURSUANT
TO NRS § 239.001/ PETITION FOR
WRIT OF MANDAMUS/
APPLICATION FOR
DECLARATORY AND
INJUNCTIVE RELIEF**

**EXPEDITED MATTER PURSUANT
TO NEV. REV. STAT. § 239.011**

COMES NOW Petitioner the Las Vegas Review-Journal (the "Review-Journal"), by and through its undersigned counsel, and hereby brings this Amended Application Pursuant to Nev. Rev. Stat. § 239.011, Petition for Writ of Mandamus, and Application for Declaratory and Injunctive Relief ("Amended Petition"), ordering the City of Henderson to provide Petitioner access to public records, and providing for declaratory and injunctive relief. Petitioner also requests an award for all fees and costs associated with its efforts to obtain withheld and/or improperly redacted public records as provided for by Nev. Rev. Stat. § 239.011(2). Further, the Review-Journal respectfully asks that this matter be expedited pursuant to Nev. Rev. Stat. § 239.011(2).

///

///

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Petitioner hereby alleges as follows:

NATURE OF ACTION

1. Petitioner brings this application for relief with regards to Henderson’s failure to comply with Nevada’s Public Records Act pursuant to Nev. Rev. Stat. § 239.011. *See also Reno Newspapers, Inc. v. Gibbons*, 127 Nev. 873, 884, 266 P.3d 623, 630, n.4 (2011).

2. Petitioner also brings this application for declaratory relief pursuant to Nev. Rev. Stat. § 30.30, § 30.070, and § 30.100.

3. Petitioner also requests injunctive relief pursuant to Nev. Rev. Stat. § 33.010.

4. The Review Journal’s application to this court is the proper means to secure Henderson’s compliance with the Nevada Public Records Act. *Reno Newspapers, Inc. v. Gibbons*, 127 Nev. 873, 884, 266 P.3d 623, 630 n.4 (2011); *see also DR Partners v. Bd. Of Cty. Comm’rs of Clark Cty.*, 116 Nev. 616, 621, 6 P.3d 465, 468 (2000) (citing *Donrey of Nevada v. Bradshaw*, 106 Nev. 630, 798 P.2d 144 (1990)) (a writ of mandamus is the appropriate procedural mechanism through which to compel compliance with a request issued pursuant to the NPRA); *see also* Nev. Rev. Stat. § 34.160, § 34.170.

5. Petitioner is entitled to an expedited hearing on this matter pursuant to Nev. Rev. Stat. § 239.011, which mandates that “the court shall give this matter priority over other civil matters to which priority is not given by other statutes.”

PARTIES

6. Petitioner, the Review-Journal, a daily newspaper, is the largest newspaper in Nevada. It is based at 1111 W. Bonanza Road, Las Vegas, Nevada 89125.

7. Respondent City of Henderson (“Henderson”) is an incorporated city in the County of Clark, Nevada. Henderson is subject to the Nevada State Public Records Act pursuant to Nev. Rev. Stat. § 239.005(b).

///
///

9. Venue is proper in the Eighth Judicial District Court of Nevada pursuant to Nev. Rev. Stat. § 239.011. All parties and all relevant actions to this matter were and are in Clark County, Nevada.

STANDING

FACTS

13. Trospen Communications is a communications firm that has a contract with the City of Henderson and also has assisted with the campaigns of elected officials in Henderson.

15. This Response fails to provide timely notice regarding any specific

1 confidentiality or privilege claim that would limit Henderson in producing (or otherwise
2 making available) all responsive documents.

3 16. Instead, in its Response, Henderson indicated that it was “in
4 process of searching for and gathering responsive e-mails and other documents,” but that
5 “[d]ue to the high number of potentially responsive documents that meet your search criteria
6 (we have approximately 5,566 emails alone) and the time required to review them for
7 privilege and confidentiality, we estimate that your request will be completed in three weeks
8 from the date we commence our review.” (Exh. 2.)

9 17. In addition to stating that it would need additional time, Henderson
10 demanded payment of almost \$6,000.00 to continue its review. It explained the basis of the
11 demand as follows:

12 The documents you have requested will require extraordinary research and
13 use of City personnel. Accordingly, pursuant to NRS 239.052, NRS
14 239.055, and Henderson Municipal Code 2.47.085, **we estimate that the**
15 **total fee to complete your request will be \$5,787.89.** This is calculated
16 by averaging the actual **hourly rate of the two Assistant City Attorneys**
17 who will be undertaking the review of potentially responsive documents
18 (\$77.99) and multiplying that rate by the total number of hours it is
estimated it will take to **review the emails and other documents**
(approximately 5,566 emails divided by 75 emails per hour equals 74.21
hours).

19 (Exh. 2 (emphasis added).)

20 18. Thus, Henderson has improperly demanded that the Review-
21 Journal pay its assistant city attorneys to review documents to determine whether they could
22 even be released. The Response made clear that Henderson would not continue searching
23 for responsive documents and reviewing them for privilege without payment, and demanded
24 a “deposit” of \$2,893.94, explaining that this was its policy:

25 Under the City’s Public Records Policy, a fifty percent deposit of fees is
26 required before we can start our review. Therefore, please submit a check
27 payable to the City of Henderson in the amount of \$2,893.94. **Once the City**
receives the deposit, we will begin processing your request.

28 (*Id.* (emphasis added).)

1 19. A copy of Henderson’s Public Records Policy (the “Policy”),
2 available online through Henderson’s official city website, is attached as Exhibit 3. Part V
3 of that policy, Henderson charges fees for any time spent in excess of thirty minutes “by
4 City staff or any City contractor” to review the requested records “in order to determine
5 whether any requested records are exempt from disclosure, to segregate exempt records, to
6 supervise the requestor’s inspection of original documents, to copy records, to certify
7 records as true copies and to send records by special or overnight methods such as express
8 mail or overnight delivery.” (Exh. 3 at p. 3.)

9 20. Henderson informed the Review-Journal that it would not release
10 any records until the total final fee was paid. The Response also states:

11 When your request is completed, we will notify you and, once the remained
12 [sic] of the fee is received, the records and any privilege log will be released
13 to you.

14 (Id.)

15 21. Even if the NPRA allowed for fees in this case, which it does not,
16 the fee calculation used by Henderson is inconsistent with the statute on which it relies, which
17 caps fees at fifty (50) cents a page. *See* Nev. Rev. Stat. § 239.055(1).

18 22. The Review-Journal is in an untenable position. Henderson has
19 demanded a huge sum just to meaningfully respond to the Request, and has made clear that
20 it may not even provide the Review-Journal with the documents it was seeking. Thus,
21 Henderson has demanded Review-Journal to pay for review of documents it may never
22 receive, without even knowing the extent to which Henderson would fulfill its request and
23 actually comply with the NPRA.

24 23. Henderson’s practice of charging impermissible fees deters NPRA
25 requests from Review-Journal reporters.

26 24. On November 29, 2016, after an informal effort to resolve this
27 dispute with Henderson failed, the Review-Journal initiated this action and filed a Petition
28 for Writ of Mandamus with this Court.

1 25. Subsequently, counsel for the Review-Journal and attorneys from
2 the City Attorneys' Office conferred extensively regarding the Review-Journal's NPRA
3 request.

4 26. On December 20, 2016, Henderson provided the Review-Journal
5 with an initial log of documents it was redacting or withholding. (A true and correct copy
6 attached as Exh. 4.)

7 27. Henderson also agreed to make the requested documents available
8 for inspection free of charge. The subsequent inspection by Review-Journal reporter Natalie
9 Bruzda took place on over the course of several days.

10 28. After requests from the undersigned, Henderson provided an
11 additional privilege log on January 9, 2017. (A true and correct copy attached as Exh. 5) In
12 that log, Henderson provided a description of the documents being withheld or redacted,
13 and the putative basis authority for withholding or redaction. (*Id.*) The log also indicated
14 who sent and received the emails responsive to the NPRA request, but in instances where
15 the sender or recipient was a city attorney or legal staff, the log did not identify the attorney
16 or staff person. (*Id.*)

17 29. Undersigned counsel for the Review-Journal, after reviewing the
18 privilege log provided on January 9, 2017, asked Henderson to revise its log to include the
19 names of the attorneys and legal staff, and to also include the identities of all recipients of
20 the communications.

21 30. On January 10, 2017, Henderson provided the Review-Journal with
22 a revised privilege log (the "Revised Log", a true and correct copy attached as Exh. 6), as
23 well as a number of redacted documents corresponding to the log (True and correct copies
24 attached as Exh. 7). In the Revised Log, Henderson included a description of the senders
25 and recipients of withheld or redacted documents. As discussed below, however,
26 Henderson's stated reasons for withholding or redacting the documents requested by the
27 Review-Journal are insufficient or inappropriate.

28 ///

LEGAL AUTHORITY

General

31. The NPRA reflects that records of governmental entities belong to the public in Nevada. Nev. Rev. Stat. § 239.010(1) mandates that, unless a record is confidential, “all public books and public records of a governmental entity must be open at all times during office hours to inspection by any person, and may be fully copied...” The NPRA reflects specific legislative findings and declarations that “[its purpose is to foster democratic principles by providing members of the public with access to inspect and copy public books and records to the extent permitted by law” and that its provisions “must be construed liberally to carry out this important purpose.”

Fees

32. The NPRA does not allow for fees to be charged for a governmental entity’s privilege review.

33. The only fees permitted are set forth in Nev. Rev. Stat. § 239.052 and Nev. Rev. Stat. § 239.055(1).

34. Nev. Rev. Stat. § 239.052(1) provides that “a governmental entity may charge a fee for providing a **copy** of a public record.” (Emphasis added.)

35. Nev. Rev. Stat. § 239.055(1), the provision Henderson is relying on for its demand for fees, does allow for fees for “extraordinary use, but it limits its application to extraordinary circumstances and caps fees at 50 cents per page.” It provides that “... if a request for a copy of a public record would require a governmental entity to make extraordinary use of its personnel or technological resources, the governmental entity may, in addition to any other fee authorized pursuant to this chapter, **charge a fee not to exceed 50 cents per page** for such extraordinary use....”

36. Interpreting Nev. Rev. Stat. § 239.055 to limit public access by requiring requesters to pay public entities for undertaking a review for responsive documents and confidentiality would be inconsistent with the plain terms of the statute and with the mandate to interpret the NPRA broadly.

1 37. Further, allowing a public entity to charge a requester for legal fees
2 associated with reviewing for confidentiality is impermissible because “[t]he public official
3 or agency bears the burden of establishing the existence of privilege based upon
4 confidentiality.” *DR Partners v. Bd. of Cty. Comm’rs of Clark Cty.*, 116 Nev. 616, 621, 6
5 P.3d 465, 468 (2000).

6 38. Even if Respondent could, as it has asserted, charge for its privilege
7 review as “extraordinary use,” such fees would be capped at 50 cents per page. Nev. Rev.
8 Stat. § 239.055(1).

9 39. Henderson Municipal Code 2.47.085 indicates that if a public
10 records request requires “extraordinary use of personnel or technology,” Henderson charges
11 \$19.38 to \$83.15 per hour (charged at the actual hourly rate of the position(s) required to
12 conduct research. *See* HMC § 2.47.085. This conflicts with the NPRA’s provision that a
13 governmental entity may only “charge a fee not to exceed 50 cents per page” for
14 “extraordinary use of its personnel or technological resources.” Nev. Rev. Stat. §
15 239.055(1)).

16 **Claims of Confidentiality; Burden to Establish Confidentiality**

17 40. The Supreme Court of Nevada has repeatedly held that a court
18 considering a claim of confidentiality regarding a public records request starts from “...the
19 presumption that all government-generated records are open to disclosure.” *Reno*
20 *Newspapers, Inc. v. Gibbons*, 127 Nev. 873, 880, 266 P.3d 623, 628 (2011); *see also Reno*
21 *Newspapers, Inc. v. Haley*, 126 Nev. 211, 234 P.3d 922 (2010); *DR Partners v. Board of*
22 *County Comm’rs*, 116 Nev. 616, 6 P.3d 465 (2000). The Supreme Court of Nevada has
23 further held that when refusing access to public records on the basis of claimed
24 confidentiality, a government entity bears the burden of proving “...that its interest in
25 nondisclosure clearly outweighs the public’s interest in access,” and that the “...state entity
26 cannot meet this burden with a non-particularized showing, or by expressing a hypothetical
27 concern.” *Reno Newspapers, Inc. v. Gibbons*, 127 Nev. 873, 880 266 P.3d 623, 628.

28 41. The NPRA provides that a governmental entity must provide timely

1 and specific notice if it is denying a request because the entity determines the documents
2 sought are confidential. Nev. Rev. Stat. § 239.0107(1)(d) states that, within five (5) business
3 days of receiving a request,

4 [i]f the governmental entity must deny the person's request because the
5 public book or record, or a part thereof, is confidential, provide to the
6 person, in writing: (1) Notice of that fact; and (2) A citation to the specific
7 statute or other legal authority that makes the public book or record, or a
8 part thereof, confidential.

9 42. In *Reno Newspapers, Inc. v. Gibbons*, the Nevada Supreme Court
10 held that a *Vaughn* index is not required when the party that requested the documents has
11 enough information to fully argue for the inclusion of documents. 127 Nev. 873, 881-82
12 (Nev. 2011). The Nevada Supreme Court has also held that if a party has enough facts to
13 present "a full legal argument," a *Vaughn* index is not needed. *Reno Newspapers*, 127 Nev.
14 at 882. It is important to note that a *Vaughn* index is not required in every NPRA case. *Id.*
15 However, the Nevada Supreme Court held that a party requesting documents under NPRA
16 is entitled to a log, unless the state entity demonstrates that the requesting party has enough
17 facts to argue the claims of confidentiality. *Id.* at 883. A log provided by a state entity should
18 contain a general factual description of each record and a specific explanation for
19 nondisclosure. *Id.* In a footnote, the Nevada Supreme Court notes that a log should provide
20 as much detail as possible, without compromising the alleged secrecy of the documents. *Id.*
21 at n. 3. Finally, attaching a string cite to a boilerplate denial is not sufficient under the NPRA.
22 *Id.* at 885.

23 **CLAIM FOR RELIEF: DECLARATORY AND INJUNCTIVE RELIEF**

24 43. Petitioner re-alleges and incorporates by reference each and every
25 allegation contained in paragraphs 1-42 with the same force and effect as if fully set forth
26 herein.

27 44. Respondent has violated the letter and the spirit of Nev. Rev. Stat.
28 § 239.010 by refusing to even determine whether responsive documents exist and whether
they are confidential unless the Las Vegas Review-Journal tenders an exorbitant sum.

1 45. The NPRA does not permit the fees Henderson is demanding.

2 46. The NPRA permits governmental entities to charge a fee of up to
3 50 cents per page for “extraordinary use” of personnel or technology to produce copies of
4 records responsive to a public records request. Nev. Rev. Stat. § 239.055(1). Henderson’s
5 Public Records Policy, however, requires requesters to pay a fee of up to \$83.15 per hour
6 just to find responsive records and review them for privilege.

7 47. Henderson either does not understand its obligations to comply
8 with the law or it is intentionally disregarding the plain terms of the NPRA to discourage
9 reporters from accessing public records.

10 48. Henderson is legally obligated to undertake a search and review of
11 responsive —free of charge—when it receives an NPRA request. It also has the burden of
12 establishing confidentiality, and is required to provide specific notice of any confidentiality
13 claims within five days. Yet it has demanded payment for staff time and attempted to
14 condition its compliance with NPRA on payment of an exorbitant sum.

15 49. Henderson demands payment not for providing copies, but simply
16 for locating documents responsive to a request—and then for having its attorneys determine
17 whether documents should be withheld. Not only is this interpretation belied by the plain
18 terms of the NPRA¹, requiring a requester to pay a public entity’s attorneys to withhold
19 documents would be an absurd result. *See S. Nevada Homebuilders Ass’n v. Clark Cty.*, 121
20 Nev. 446, 449, 117 P.3d 171, 173 (2005) (noting that courts must “interpret provisions
21 within a common statutory scheme harmoniously with one another in accordance with the
22 general purpose of those statutes and to avoid unreasonable or absurd results, thereby giving
23 effect to the Legislature’s intent”) (quotation omitted); *see also Cal. Commercial Enters. v.*
24 *Amedeo Vegas I, Inc.*, 119 Nev. 143, 145, 67 P.3d 328, 330 (2003) (“When a statute is not
25 ambiguous, this court has consistently held that we are not empowered to construe the
26 statute beyond its plain meaning, unless the law as stated would yield an absurd result.”)

27 ¹ *See Sandifer v. U.S. Steel Corp.*, 134 S. Ct. 870, 876 (2014) (“It is a fundamental canon of
28 statutory construction” that, “unless otherwise defined, words will be interpreted as taking
their ordinary, contemporary, common meaning.”) (quotation omitted).

1 50. Declaratory relief is appropriate to address, *inter alia*, the rights of
2 the parties and the validity of Henderson Municipal Code 2.47.085 and the Policy. Nev.
3 Rev. Stat. § 30.030.; *see also* Nev. Rev. Stat. § 30.040; Nev. Rev. Stat. § 30.070, and Nev.
4 Rev. Stat. § 30.100.

5 51. Nev. Rev. Stat. § 33.010 also authorizes this Court to grant
6 injunctive relief under the following circumstances, which are present in this case:

7 When it shall appear by the complaint that the plaintiff is entitled to the
8 relief demanded, and such relief or any part thereof consists in restraining
9 the commission or continuance of the act complained of, either for a
10 limited period or perpetually; 2. When it shall appear by the complaint or
11 affidavit that the commission or continuance of some act, during the
12 litigation, would produce great or irreparable injury to the plaintiff, and 3.
13 When it shall appear, during the litigation, that the defendant is doing or
14 threatens, or is about to do, or is procuring or suffering to be done, some
act in violation of the plaintiff's rights respecting the subject of the action,
and tending to render the judgment ineffectual.

14 **CLAIM FOR RELIEF: WRIT OF MANDAMUS**

15 52. Petitioner re-alleges and incorporates by reference each and every
16 allegation contained in paragraphs 1-51 with the same force and effect as if fully set forth
17 herein.

18 53. A writ of mandamus is necessary to compel Respondent's
19 compliance with the NPRA. Henderson is continuing to refuse to make documents available
20 for either inspection or copying without having met its burden under the NPRA. The
21 Review-Journal should be provided with the records it has requested regarding Trospen
22 Communications pursuant to the NPRA. The records sought are subject to disclosure, and
23 Respondent has not met its burden of establishing otherwise. The Revised Log does not
24 satisfy Respondent's burden

25 54. Thus, a writ of mandate should issue requiring Henderson to make
26 the documents available in their entirety and without redactions (other than documents
27 which have been redacted to protect personal information, which the Review-Journal does
28 not object to). *See Donrey of Nevada v. Bradshaw*, 106 Nev. 630, 798 P.2d 144 (1990)) (a

1 writ of mandamus is the appropriate procedural remedy to compel compliance with the
2 NPRA); *see also* Nev. Rev. Stat. § 34.160, § 34.170.

3
4 WHEREFORE, the Petitioner prays for the following relief:

5 1. That the court handle this matter on an expedited basis as mandated
6 by NRS 239.011;

7 2. That this court issue a writ of mandamus requiring that Defendant
8 City of Henderson immediately make available complete copies of all records requested but
9 previously withheld and/or redacted (other than documents that were redacted to protect
10 personal identifiers);

11 3. Injunctive relief prohibiting Defendant City of Henderson from
12 applying the provisions contained in Henderson Municipal Code 2.47.085 and the Policy to
13 demand or charge fees in excess of those permitted by the NPRA;

14 4. Declaratory relief stating that Henderson Municipal Code 2.47.085
15 and the Policy are invalid to the extent they provide for fees in excess of those permitted by
16 the NPRA;

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1 5. Declaratory relief limiting Henderson to charging fees for
2 “extraordinary fees, in those circumstances that permit it, to fifty cents per page and limiting
3 Henderson from demanding fees for attorney review.

4 6. Reasonable costs and attorney’s fees; and

5 7. Any further relief the Court deems appropriate.

6
7 DATED this the 8th day of February, 2017.

8
9 Respectfully submitted,

10
11 By: 

12 Margaret A. McLetchie, Nevada Bar No. 10931

13 Alina M. Shell, Nevada Bar No. 11711

14 MCLETCHIE SHELL LLC

15 701 East Bridger Ave., Suite 520

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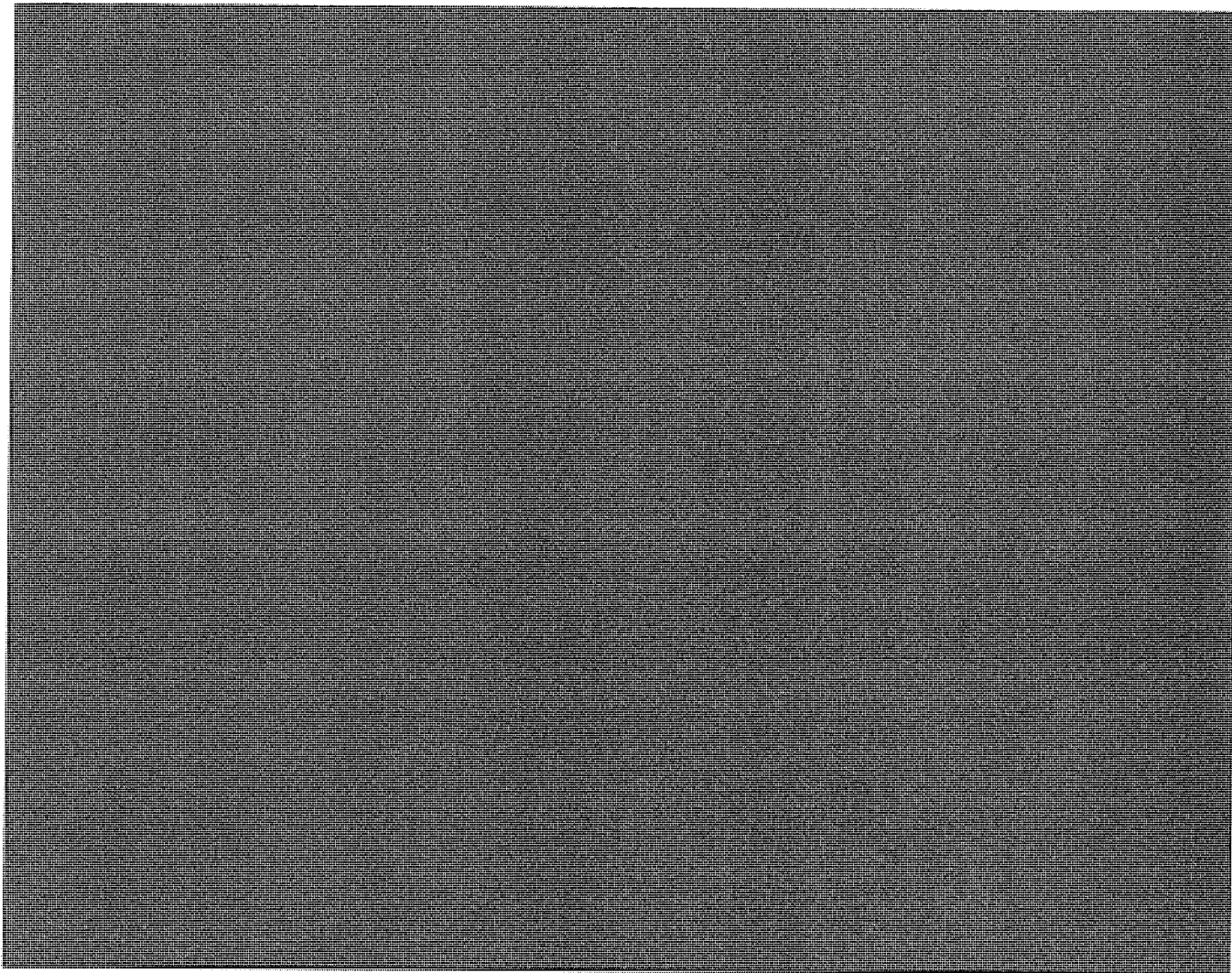
19 Counsel for Petitioner
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Brandon P. Kemble, Asst. City Attorney
Brian R. Reeve, Asst. City Attorney
CITY OF HENDERSON'S ATTORNEY OFFICE
240 Water Street, MSC 144
Henderson, NV 89015
Counsel for Respondent, City of Henderson


An Employee of MCLECHIE SHELL LLC

EXHIBIT 1



----- Forwarded message -----

From: **Natalie Bruzda** <nbruzda@reviewjournal.com>

Date: Tue, Oct 4, 2016 at 11:06 AM

Subject: Communications Department public records request

To: Laura Fucci <Laura.Fucci@cityofhenderson.com>, Javier.Trujillo@cityofhenderson.com

Dear Ms. Fucci and Mr. Trujillo,

Attached to this email is a public records request. I also submitted the request through the Contact Henderson feature on the city's website.

Thank you.

Sincerely,

--

Natalie Bruzda
Las Vegas Review-Journal
702-477-3897
[@nataliebruzda](https://twitter.com/nataliebruzda)

--
Natalie Bruzda
Las Vegas Review-Journal
702-477-3897
@nataliebruzda

Via Email

Oct. 4, 2016

Laura Fucci, Chief Information Officer
Henderson City Hall
240 Water St. MSC 123
P.O. Box 95050
Henderson, NV 89009-5050
Office Fax: 702-267-4301
E-Mail: Laura.Fucci@cityofhenderson.com

Javier Trujillo, Director of Intergovernmental Relations
Henderson City Hall
P.O. Box 95050
Henderson, NV 89009-5050
Office Fax: 702-267-2081
E-Mail: Javier.Trujillo@cityofhenderson.com

Dear Ms. Fucci and Mr. Trujillo,

Pursuant to Nevada's Public Records Act (Nevada Revised Statutes § 239.010 et. seq.) and on behalf of the Las Vegas Review-Journal, we hereby request the Communications Department documents listed below.

Documents requested:

- All emails to or from City of Henderson Communications Department personnel, Council members, or the Mayor that contain the words "Trosper Communications," "Elizabeth Trosper," or "crisis communications;"
- All emails pertaining to or discussing work performed by Elizabeth Trosper or Trosper Communications on behalf of the City of Henderson;
- All documents pertaining to or discussing contracts, agreements, or possible contracts, with Elizabeth Trosper or Trosper Communication; and
- All documents pertaining to or discussing the terms under which Elizabeth Trosper or Trosper Communications provided, provide, or will provide services to the City of Henderson.

Date limitations:

For all documents requested, please limit your searches for responsive documents from January 1, 2016 to the present.

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///
///

Further instructions:

Please provide copies of all responsive records. For electronic records, please provide the records in their original electronic form attached to an email, or downloaded to an electronic medium. We are happy to provide the electronic medium and to pick up the records. For hard copy records, please feel free to attach copies to an email as a .pdf, or we are happy to pick up copies. We will also gladly take information as it becomes available; please do not wait to fill the entire request, but send each part or contact us as it becomes available.

If you intend to charge any fees for obtaining copies of these records, please contact us immediately (no later than 5 days from today) if the cost will exceed \$50. In any case, we would like to request a waiver of any fees for copies because this is a media request, and the disclosure of the requested information is in the public interest and will contribute significantly to the public's understanding of the operation of the Communications Department and Intergovernmental Relations.

If you deny access to any of the records requested in whole or in part, please explain your basis for doing so in writing within five (5) days, citing the specific statutory provision or other legal authority you rely upon to deny access. NRS § 239.011(1)(d). Please err on the side of fully providing records. Nevada's Public Records Act requires that its terms be construed liberally and mandates that any exception be construed narrowly. NRS § 239.001(2), (3). Please also redact or separate out the information that you contend is confidential rather than withholding records in their entirety, as required by Nev. Rev. Stat. § 239.010(3).

Again, please cite the statutory provision you rely upon to redact or withhold part of a record. Please also keep in mind that the responding governmental entity has the burden of showing that the record is confidential. NRS § 239.0113; *see also DR Partners v. Bd. of Cty. Comm'rs of Clark Cty.*, 116 Nev. 616, 621, 6 P.3d 465, 468 (2000) ("The public official or agency bears the burden of establishing the existence of privilege based upon confidentiality. It is well settled that privileges, whether creatures of statute or the common law, should be interpreted and applied narrowly.")

Please provide the records or a response within five (5) business days pursuant to Nev. Rev. Stat. §239.0107. Again, please email your response to nbruzda@reviewjournal.com and tspousta@reviewjournal.com rather than U.S. Mail so we can review as quickly as possible.

Thank you in advance for your cooperation with my request. Please contact us with any questions whatsoever. In addition to email, you can reach Natalie by phone at 702-477-3897.

Sincerely,

Natalie Bruzda
Reporter

Tom Spousta
Assistant City Editor

EXHIBIT 2



Natalie Bruzda <nbruzda@reviewjournal.com>

Public Records Request regarding Trospen Communications

Brian Reeve <Brian.Reeve@cityofhenderson.com>

Tue, Oct 11, 2016 at 5:10 PM

To: "nbruzda@reviewjournal.com" <nbruzda@reviewjournal.com>, "tspousta@reviewjournal.com" <tspousta@reviewjournal.com>

Cc: Javier Trujillo <Javier.Trujillo@cityofhenderson.com>, David Cherry <David.Cherry@cityofhenderson.com>, Kristina Gilmore <Kristina.Gilmore@cityofhenderson.com>

Dear Ms. Bruzda and Mr. Spousta,

I'm writing in response to your public records request to the City of Henderson dated October 4, 2016 regarding Elizabeth Trospen and Trospen Communications. We are in the process of searching for and gathering responsive e-mails and other documents. Due to the high number of potentially responsive documents that meet your search criteria (we have approximately 5,566 emails alone) and the time required to review them for privilege and confidentiality, we estimate that your request will be completed in three weeks from the date we commence our review.

The documents you have requested will require extraordinary research and use of City personnel. Accordingly, pursuant to NRS 239.052, NRS 239.055, and Henderson Municipal Code 2.47.085, we estimate that the total fee to complete your request will be \$5,787.89. This is calculated by averaging the actual hourly rate of the two Assistant City Attorneys who will be undertaking the review of potentially responsive documents (\$77.99) and multiplying that rate by the total number of hours it is estimated it will take to review the emails and other documents (approximately 5,566 emails divided by 75 emails per hour equals 74.21 hours). Under the City's Public Records Policy, a fifty percent deposit of fees is required before we can start our review. Therefore, please submit a check payable to the City of Henderson in the amount of \$2,893.94. Once the City receives the deposit, we will begin processing your request. When your request is completed, we will notify you and, once the remainder of the fee is received, the records and any privilege log will be released to you.

Please let me know if you have any questions or would like to discuss your request further.

Regards,

Brian R. Reeve

Assistant City Attorney

702.267.1385

EXHIBIT 3



City of Henderson Public Records Policy

I. Purpose.

The City of Henderson recognizes that Nevada Public Records Law (NRS 239.010-239.055) gives members of the public and media the right to inspect and copy certain public records maintained by the City.¹ The City also recognizes that certain records maintained by the City are exempt from public disclosure, or that disclosure may require balancing the right of the public to access the records against individual privacy rights, governmental interests, confidentiality issues and attorney/client privilege. Additionally, when the City receives a request to inspect or copy public records, costs are incurred by the City in responding to the request. The purpose of this Public Records Policy is (a) to establish an orderly and consistent procedure for receiving and responding to public records requests from the public and media; (b) to establish the basis for a fee schedule designed to reimburse the City for the actual costs incurred in responding to public records requests; and (c) to inform citizens and members of the media of the procedures and guidelines that apply to public records requests.

¹ The City is required to respond to public requests by Nevada Public Records Law. The Federal "Freedom of Information Act" (FOIA) does not apply to requests for the City's public records. FOIA only applies to requests for public records maintained by the federal government.

II. Definitions.

Nevada Public Records law defines a public record as:

"A record of a local governmental entity that is created, received or kept in the performance of a duty and paid for with public money." (NAC 239.091)

A record may be handwritten, typed, photocopied, printed, or microfilmed, and exist in an electronic form such as e-mail or a word processing document, or other types of electronic recordings.

III. Policy.

It is the policy of the City to respond in an orderly, consistent and reasonable manner in accordance with the Nevada Public Records Law to requests to inspect or receive copies of public records maintained by the City. The City must respond to the request within five (5) business days. This response must be one of the following: (a) providing the record for inspection or copying; (b) provide in writing the name and address of the government entity, if known, should the City not have legal custody of the record; (c) the date at which time the record will be available for inspection or copying; or (d) reason for denial of the request. Factors that may delay production of records include: the size and complexity of the request, available staff time and resources, and whether legal counsel needs to be consulted prior to disclosing the requested records.

Some public records requests are requests for information that would actually require the creation of a new public record. Public bodies are not obligated under Nevada's Public Records Law to create new public records where none exists in order to respond to requests for information. Although a public body may, if it chooses, create a new record to provide information, the public body does not have to create a new record and only has a duty to allow the inspection and copying of an existing public record.

A person may request a copy of a public record in any medium in which the public record is readily available. An officer, employee or agent of the City who has legal custody or control of a public record shall not refuse to provide a copy of that public record in a readily available medium because the officer, employee or agent has already prepared or would prefer to provide the copy in a different medium.

IV. Procedure.

With the exception of records listed in section VI, the following procedures must be followed in submitting and responding to requests to inspect or receive copies of public records maintained by the City:

- A. Records Requests by general public. Public records requests may be made via Contact Henderson. Click on Contact Henderson via the City of Henderson webpage (www.cityofhenderson.com) then select "Records Requests" and the appropriate category; then click "Next". Follow the subsequent steps to submit your case. If you are unsure which category to select, please choose "Other." Submitting your request in writing helps to reduce confusion about the information being requested and effectively communicating your request will help ensure a timely response. Requests should identify as specifically as possible the type of record(s), subject matter, approximate date(s), and the desired method of delivery (email, hardcopies, etc.). Additionally, public records requests may be made by calling the City Clerk's Office at (702) 267-1419, or by writing or visiting the City Clerk's Office at City Hall, 240 Water St., Henderson, Nevada.

Records Requests by media. Public records requests from members of the media may be made via Contact Henderson. Click on Contact Henderson via the City of Henderson webpage (www.cityofhenderson.com) then select "Records Requests" and click on the "Media" category; then click "Next". Follow the subsequent steps to submit your case. Submitting your request in writing helps to reduce confusion about the information being requested and effectively communicating your request will help ensure a timely response. Requests should identify as specifically as possible the type of record(s), subject matter, approximate date(s), and the desired method of delivery (email, hardcopies, etc.). Additionally, public records requests may be made by calling the office of Communications and Council Support at (702) 267-2020.

- B. Processing a Public Records Request. Upon receipt of a public records request:
- a. Staff shall determine resources required to provide all requested records and prepare an estimate of fees if applicable. Staff shall contact the requestor through the Contact Henderson system prior to five (5) business days. If applicable, the estimate of fees must be provided to the requestor at this time. Depending on the scope and magnitude of the records request, a 50 percent deposit of fees prior to the start of research may be required. If a deposit is required or an estimate of fees is provided, staff shall wait for

requestor approval of the fee estimate prior to continuing work. The remainder of fees must be paid before records are delivered. Throughout the process of completing the request and prior to resolving the case, staff shall note all relevant communications with the requestor in the Contact Henderson case.

- b. If staff are unable to provide the records within five days, staff shall provide the requestor with notice of one of the following:
 - i. If the department does not have legal custody or control of the requested record, staff shall communicate to the requestor the name and address of the governmental entity that has legal custody or control of the record, if known.
 - ii. If the record has been destroyed, staff shall communicate so to the requestor and cite approved records retention schedule.
 - iii. If the department is unable to make the record available by the end of the fifth business day after receiving the request, staff shall specify to the requestor a date and time the record will be available.
 - iv. If the record is confidential, and access is denied, staff shall communicate this to the requestor and cite the specific statute or other legal authority that declares the record to be confidential.

V. Fees (HMC 2.47.0825).

The fees for responding to a public records request will be those established in the fee schedule adopted by the City which is in effect at the time the request is submitted. The fees will be reasonably calculated to reimburse the City for its actual costs in making the records available and may include:

- A. Charges for the time spent, in excess of thirty (30) minutes, by City staff or any City contractor to locate the requested public records, to review the records in order to determine whether any requested records are exempt from disclosure, to segregate exempt records, to supervise the requestor's inspection of original documents, to copy records, to certify records as true copies and to send records by special or overnight methods such as express mail or overnight delivery.
- B. A per page charge for photocopies of requested records.
- C. A per item charge for providing CDs, audiotapes, or other electronic copies of requested records.

The current fee schedule is located on the City's website at <http://www.cityofhenderson.com/docs/default-source/city-clerk-docs/city-wide-public-records-and-document-services-general-fee-table08-14.pdf?sfvrsn=2>

Staff will prepare an estimate of the charges that will be incurred to respond to a public records request. Prepayment of the estimated charges or a 50 percent deposit may be required. Unless otherwise prohibited by law, the City may, at the City's discretion, furnish copies of requested records without charge or at a reduced fee if the City determines that the waiver or reduction of fees is in the public interest.

VI. Public Records Exempt from Disclosure.

There are types of public records that are exempt from disclosure. A few specific exemptions worth special notice are as follows:

- A. **Personal Identifying Information – NRS 239B.030(5a).** Each governmental agency shall ensure that any personal information contained in a document that has been recorded, filed or otherwise submitted to the governmental agency, which the governmental agency continues to hold, is maintained in a confidential manner if the personal information is required to be included in the document pursuant to a specific state or federal law, for the administration of a public program or for an application for a federal or state grant.
- B. **Bids and Proposals under Negotiation or Evaluation – NRS 332.061(2).** Bids which contain a provision that requires negotiation or evaluation may not be disclosed until the bid is recommended for award of a contract. Upon award of the contract, all of the bids, successful or not, with the exception of proprietary/confidential information, are public record and copies shall be made available upon request.
- C. **Bids and Proposals Containing Proprietary Information – NRS 332.061(1).** Proprietary information does not constitute public information and is confidential.
- D. **Recreation Program Registration – NRS 239.0105.** Records of recreational facility/activity registration where the name, address, and telephone number of the applicant are collected are confidential.
- E. **Emergency Action Plans and Infrastructure Records – NRS 239C.210(2).** Records detailing the City's Emergency Response Plans and critical infrastructure are confidential.
- F. **Employee Personnel and Medical Records –HIPAA 45 CFR Part 160 and Part 164.** All employee personnel and medical records are confidential.
- G. **Databases Containing Electronic Mail Addresses or Telephone Numbers – NRS 239B.040.** Electronic mail addresses and/or telephone numbers collected for the purpose of or in the course of communicating with the city may be maintained in a database. This database is confidential in its entirety, is not public record, and it must not be disclosed in its entirety as a single unit; however, the individual electronic mail address or telephone number of a person is not confidential and may be disclosed individually.
- H. **Medical Records – Health Insurance Portability and Accountability Act (HIPAA 45 CFR Part 160 and Part 164).** Medical records collected during medical transports may only be disclosed to the patient or as authorized by the patient.
- I. **Attorney/Client Privileged Records –RPC 1.6.** A lawyer shall not reveal information relating to representation of a client.
- J. **Restricted Documents – NRS 239C.220.** Blueprints or plans of schools, places of worship, airports other than an international airport, gaming establishments, governmental buildings or any other building or facility which is likely to be targeted for a terrorist attack are considered

"Restricted Documents." The City also classifies Civil Improvement Plans as restricted documents. These plans can only be inspected after supplying: (a) name; (b) a copy of a driver's license or other photographic identification that is issued by a governmental entity; (c) the name of employer, if any; (d) citizenship; and (e) a statement of the purpose for the inspection.

Individuals must meet one of the following criteria to receive a copy of a restricted document: upon the lawful order of a court of competent jurisdiction; as is reasonably necessary in the case of an act of terrorism or other related emergency; to protect the rights and obligations of a governmental entity or the public; upon the request of a reporter or editorial employee who is employed by or affiliated with a newspaper, press association or commercially operated and federally licensed radio or television station and who uses the restricted document in the course of such employment or affiliation; or upon the request of a registered architect, licensed contractor or a designated employee of any such architect or contractor who uses the restricted document in his or her professional capacity.

- K. **Records Detailing Investigations or Relating to Litigation or Potential Litigation —Donrey v. Bradshaw.** Records involving criminal investigations, litigation or potential litigation are considered confidential.
- L. **Local Ethics Committee Opinions – NRS 281A.350.** Each request for an opinion submitted to a specialized or local ethics committee, each hearing held to obtain information on which to base an opinion, all deliberations relating to an opinion, each opinion rendered by a committee and any motion relating to the opinion are confidential unless:
 - a. The public officer or employee acts in contravention of the opinion; or
 - b. The requester discloses the content of the opinion.
- M. **Economic Development Initial Contact and Research Records (NRS 268.910)** An organization for economic development formed by one or more cities shall, at the request of a client, keep confidential any record or other document in its possession concerning the initial contact with and research and planning for that client. If such a request is made, the executive head of the organization shall attach to the file containing the record or document a certificate signed by the executive head stating that a request for confidentiality was made by the client and showing the date of the request.
Except as otherwise provided in NRS 239.0115, records and documents that are confidential pursuant to the above 1 remain confidential until the client:
 - a. Initiates any process regarding the location of his or her business in a city that formed the organization for economic development which is within the jurisdiction of a governmental entity other than the organization for economic development; or
 - b. Decides to locate his or her business in a city that formed the organization for economic development.

VII. Copyrighted Material.

If the City maintains public records containing copyrighted material, the City will permit the person making the request to inspect the copyrighted material, and may allow limited copying of such material if allowed under Federal copyright law. The City may require written consent from the copyright holder or an opinion from the person's legal counsel before allowing copying of such materials.

EXHIBIT 4

Doc #	Basis for Redaction/Non-Production	Authority	Redaction
3	Attorney Client Privilege	NRS 49.095	Redaction
181	Attorney Client Privilege	NRS 49.095	Redaction
184	Attorney Client Privilege	NRS 49.095	Redaction
191	Attorney Client Privilege	NRS 49.095	Redaction
193	Attorney Client Privilege	NRS 49.095	Redaction
195	Attorney Client Privilege	NRS 49.095	Redaction
199	Attorney Client Privilege	NRS 49.095	Redaction
226	Attorney Client Privilege	NRS 49.095	Redaction
227	Attorney Client Privilege	NRS 49.095	Redaction
233	Attorney Client Privilege	NRS 49.095	Redaction
234	Attorney Client Privilege	NRS 49.095	Redaction
237	Attorney Client Privilege	NRS 49.095	Redaction
238	Attorney Client Privilege	NRS 49.095	Redaction
244	Attorney Client Privilege	NRS 49.095	Redaction
245	Attorney Client Privilege	NRS 49.095	Redaction
246	Attorney Client Privilege	NRS 49.095	Redaction
249	Attorney Client Privilege	NRS 49.095	Redaction
251	Attorney Client Privilege	NRS 49.095	Redaction
252	Attorney Client Privilege	NRS 49.095	Redaction
267	Attorney Client Privilege	NRS 49.095	Redaction
647	Confidential personal information	Donrey of Nevada, Inc. v. Bradshaw, 106 Nev. 630 (1990)	Redaction
669	Confidential personal information	Donrey of Nevada, Inc. v. Bradshaw, 106 Nev. 630 (1990)	Redaction
1362	Deliberative Process Privilege	DR Partners v. Board of County Com'ts of Clark County, 116 Nev. 616	Redaction
1363	Deliberative Process Privilege	DR Partners v. Board of County Com'ts of Clark County, 116 Nev. 616	Redaction
1364	Deliberative Process Privilege	DR Partners v. Board of County Com'ts of Clark County, 116 Nev. 616	Redaction
1365	Deliberative Process Privilege	DR Partners v. Board of County Com'ts of Clark County, 116 Nev. 616	Redaction
1366	Deliberative Process Privilege	DR Partners v. Board of County Com'ts of Clark County, 116 Nev. 616	Redaction
1367	Deliberative Process Privilege	DR Partners v. Board of County Com'ts of Clark County, 116 Nev. 616	Redaction
1807	Attorney Client Privilege	NRS 49.095	Redaction
1808	Attorney Client Privilege	NRS 49.095	Redaction
1809	Attorney Client Privilege	NRS 49.095	Redaction
2485	Attorney Client Privilege	NRS 49.095	Redaction
2487	Attorney Client Privilege	NRS 49.095	Redaction
2491	Attorney Client Privilege	NRS 49.095	Redaction
3352	Attorney Client Privilege	NRS 49.095	Redaction
3862	Deliberative Process Privilege	DR Partners v. Board of County Com'ts of Clark County, 116 Nev. 616	Redaction
3864	Deliberative Process Privilege	DR Partners v. Board of County Com'ts of Clark County, 116 Nev. 616	Redaction
3866	Deliberative Process Privilege	DR Partners v. Board of County Com'ts of Clark County, 116 Nev. 616	Redaction
4016	Attorney Client Privilege	NRS 49.095	Redaction
4056	Attorney Client Privilege	NRS 49.095	Redaction
4057	Attorney Client Privilege	NRS 49.095	Redaction
4058	Attorney Client Privilege	NRS 49.095	Redaction
4078	Attorney Client Privilege	NRS 49.095	Redaction

Doc #	Basis for Redaction/Non-Production	Authority	Redaction
4083	Attorney Client Privilege	NRS 49.095	
4084	Attorney Client Privilege	NRS 49.095	
4090	Attorney Client Privilege	NRS 49.095	
4091	Attorney Client Privilege	NRS 49.095	
4092	Attorney Client Privilege	NRS 49.095	
4093	Attorney Client Privilege	NRS 49.095	
4094	Attorney Client Privilege	NRS 49.095	
4095	Attorney Client Privilege	NRS 49.095	
4944	Attorney Client Privilege	NRS 49.095	Redaction
4954	Attorney Client Privilege	NRS 49.095	Redaction
4955	Attorney Client Privilege	NRS 49.095	Redaction
5249	Attorney Client Privilege	NRS 49.095	Redaction
5253	Attorney Client Privilege	NRS 49.095	Redaction
5695	Attorney Client Privilege	NRS 49.095	Redaction
6535	Deliberative Process Privilege	DR Partners v. Board of County Com'ts of Clark County, 116 Nev. 616	
6759	Attorney Client Privilege	NRS 49.095	
6882	Attorney Client Privilege	NRS 49.095	
6883	Attorney Client Privilege	NRS 49.095	
6958	Attorney Client Privilege	NRS 49.095	
6959	Attorney Client Privilege	NRS 49.095	
6978	Attorney Client Privilege	NRS 49.095	
7009	Attorney Client Privilege	NRS 49.095	Redaction
7019	Attorney Client Privilege	NRS 49.095	
7059	Attorney Client Privilege	NRS 49.095	
7127	Attorney Client Privilege	NRS 49.095	
7199	Attorney Client Privilege	NRS 49.095	
7406	Attorney Client Privilege	NRS 49.095	
7496	Attorney Client Privilege	NRS 49.095	
7507	Attorney Client Privilege	NRS 49.095	
7509	Attorney Client Privilege	NRS 49.095	
7631	Attorney Client Privilege	NRS 49.095	
7636	Attorney Client Privilege	NRS 49.095	
7676	Confidential personal information	Donrey of Nevada, Inc. v. Bradshaw, 106 Nev. 630 (1990)	
7678	Confidential personal information	Donrey of Nevada, Inc. v. Bradshaw, 106 Nev. 630 (1990)	Redaction
7698	Attorney Client Privilege	NRS 49.095	
7703	Attorney Client Privilege	NRS 49.095	
7717	Deliberative Process Privilege	DR Partners v. Board of County Com'ts of Clark County, 116 Nev. 616 (2000)	
7718	Deliberative Process Privilege	DR Partners v. Board of County Com'ts of Clark County, 116 Nev. 616 (2000)	

Doc #	Basis for Redaction/Non-Production	Authority	Redaction
9218	Deliberative Process Privilege	DR Partners v. Board of County Com'rs of Clark County, 116 Nev. 616 (2000)	
12153	Attorney Client Privilege	NRS 49.095	
12154	Attorney Client Privilege	NRS 49.095	
12156	Attorney Client Privilege	NRS 49.095	
12184	Attorney Client Privilege	NRS 49.095	
12185	Attorney Client Privilege	NRS 49.095	
12189	Attorney Client Privilege	NRS 49.095	
12328	Attorney Client Privilege	NRS 49.095	Redaction
13422	Attorney Client Privilege	NRS 49.095	Redaction
13423	Attorney Client Privilege	NRS 49.095	Redaction
13425	Attorney Client Privilege	NRS 49.095	Redaction
13428	Attorney Client Privilege	NRS 49.095	Redaction

EXHIBIT 5

Doc #	Email senders and recipients	Description	Basis for Redaction/Non-Production	Authority	Redaction
3		Internal report containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services and/or containing legal advice	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
181	attorney and paralegal and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
184	attorney and paralegal and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
191	attorney and paralegal and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
193		Draft Trosper contract containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
195	attorney and paralegal and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
199	attorney and paralegal and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
226	attorney and paralegal and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
227	attorney and paralegal and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
233	attorney and paralegal and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
234	attorney and paralegal and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
237	attorney and paralegal and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
238	attorney and paralegal and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
244	attorney and paralegal and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	

Doc #	Email senders and recipients	Description	Basis for Redaction/Non-Production	Authority	Redaction
245	attorney and paralegal and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
246	attorney and paralegal and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
249	attorney and paralegal and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
251	attorney and paralegal and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
252	attorney and paralegal and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
267	attorney and paralegal and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
647		Employer Identification Number for tax return, possible SS#	Confidential personal information - Employer Identification Number	Donrey of Nevada, Inc. v. Bradshaw, 106 Nev. 630 (1990)	Redaction
669		Employer Identification Number for tax return, possible SS#	Confidential personal information - Employer Identification Number	Donrey of Nevada, Inc. v. Bradshaw, 106 Nev. 630 (1990)	Redaction
1362	David Cherry (PIO) Liz Trosper (agent), Robert Murnane (City Manager, Javier Trujillo (Public Affairs)	Electronic correspondence containing mental impressions and strategy of City management regarding preparation of public statement and comments on draft statement	Deliberative Process Privilege	DR Partners v. Board of County Com'rs of Clark County, 116 Nev. 616 (2000)	
1363	David Cherry (PIO) Liz Trosper (agent), Robert Murnane (City Manager, Javier Trujillo (Public Affairs)	Electronic correspondence containing mental impressions and strategy of City management regarding preparation of public statement and comments on draft statement	Deliberative Process Privilege	DR Partners v. Board of County Com'rs of Clark County, 116 Nev. 616 (2000)	
1364	David Cherry (PIO) Liz Trosper (agent), Robert Murnane (City Manager, Javier Trujillo (Public Affairs)	Electronic correspondence containing mental impressions and strategy of City management regarding preparation of public statement and comments on draft statement	Deliberative Process Privilege	DR Partners v. Board of County Com'rs of Clark County, 116 Nev. 616 (2000)	
1365	David Cherry (PIO) Liz Trosper (agent), Robert Murnane (City Manager, Javier Trujillo (Public Affairs)	Electronic correspondence containing mental impressions and strategy of City management regarding preparation of public statement and comments on draft statement	Deliberative Process Privilege	DR Partners v. Board of County Com'rs of Clark County, 116 Nev. 616 (2000)	
1366	David Cherry (PIO) Liz Trosper (agent), Robert Murnane (City Manager, Javier Trujillo (Public Affairs)	Electronic correspondence containing mental impressions and strategy of City management regarding preparation of public statement and comments on draft statement	Deliberative Process Privilege	DR Partners v. Board of County Com'rs of Clark County, 116 Nev. 616 (2000)	
1367	David Cherry (PIO) Liz Trosper (agent), Robert Murnane (City Manager, Javier Trujillo (Public Affairs)	Electronic correspondence containing mental impressions and strategy of City management regarding preparation of public statement and comments on draft statement	Deliberative Process Privilege	DR Partners v. Board of County Com'rs of Clark County, 116 Nev. 616 (2000)	
1807	attorney, David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction

Doc #	Email senders and recipients	Description	Basis for Redaction/Non-Production	Authority	Redaction
1808	attorney, David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
1809	attorney, David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
2485	attorney, David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
2487	attorney, David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
2491	attorney and Gerri Schroeder (Council)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re HAD	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
3352		Internal report containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
3862	David Cherry (PIO) Liz Trosper (agent), Robert Mumane (City Manager, Javier Trujillo (Public Affairs)	Electronic correspondence containing mental impressions and strategy of City management regarding preparation of public statement and comments on draft statement	Deliberative Process Privilege	DR Partners v. Board of County Com'rs of Clark County, 116 Nev. 616 (2000)	
3864	David Cherry (PIO) Liz Trosper (agent), Robert Mumane (City Manager, Javier Trujillo (Public Affairs)	Electronic correspondence containing mental impressions and strategy of City management regarding preparation of public statement and comments on draft statement	Deliberative Process Privilege	DR Partners v. Board of County Com'rs of Clark County, 116 Nev. 616 (2000)	
3866	David Cherry (PIO) Liz Trosper (agent), Robert Mumane (City Manager, Javier Trujillo (Public Affairs)	Electronic correspondence containing mental impressions and strategy of City management regarding preparation of public statement and comments on draft statement	Deliberative Process Privilege	DR Partners v. Board of County Com'rs of Clark County, 116 Nev. 616 (2000)	
4016	attorney, David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
4056	attorney, David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
4057	attorney, David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
4058	attorney, David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
4078	attorney, David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
4083	attorney, David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
4084	attorney, David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
4090	attorney, David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	

Doc #	Email senders and recipients	Description	Basis for Redaction/Non-Production	Authority	Redaction
4091	attorney, David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
4092	attorney, David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
4093	attorney, David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
4094	attorney, David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
4095	attorney, David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
4944	Kathy Blaha (PIO), Joanne Wershba (City staff), Ray Everhart (City staff)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
4954	Kathy Blaha (PIO), Joanne Wershba (City staff), Ray Everhart (City staff)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
4955	Kathy Blaha (PIO), Joanne Wershba (City staff), Ray Everhart (City staff)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
5249		Internal report containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
5253		Internal report containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
5695		Internal report containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
6759		Internal status report prepared by attorney containing legal thoughts, impressions, and advice concerning legal matters	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
6882	attorneys within the City Attorney's Office	Electronic correspondence containing internal status report prepared by attorney containing legal thoughts, impressions, and advice concerning legal matters	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
6883		Internal status report prepared by attorney containing legal thoughts, impressions, and advice concerning legal matters	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
6958		Electronic correspondence containing internal status report prepared by attorney containing legal thoughts, impressions, and advice concerning legal matters	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
6959		Internal status report prepared by attorney containing legal thoughts, impressions, and advice concerning legal matters	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
6978	attorney and paralegal and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
7009	attorney and paralegal and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction

Doc #	Email senders and recipients	Description	Basis for Redaction/Non-Production	Authority	Redaction
7019	attorney and paralegal and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
7059	attorney and paralegal and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
7127	attorney and paralegal and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
7199	attorney and paralegal and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
7406		Internal status report prepared by attorney containing legal thoughts, impressions, and advice concerning legal matters	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
7496	Karina Milana (Public relations) and attorney	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
7507	attorney and paralegal and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
7509	Karina Milana (Public relations) and attorney	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
7631	Karina Milana (Public relations) and attorney	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
7636	Karina Milana (Public relations) and attorney	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
7676		Correspondence between employee and supervisor relating to personal medical information of employee	Confidential personal medical information	Donrey of Nevada, Inc. v. Bradshaw, 106 Nev. 630 (1990)	
7678		Correspondence between employee and supervisor relating to personal medical information of employee	Confidential personal medical information	Donrey of Nevada, Inc. v. Bradshaw, 106 Nev. 630 (1990)	Redaction
7698	Karina Milana (Public relations) and attorney	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
7703	Karina Milana (Public relations) and attorney	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
7717	Laura Shearin (City Manager's Office), Jennifer Fennema (Human Resources)	Electronic correspondence containing mental impressions and strategy of City management regarding changes to organizational structure within the City Manager's Office	Deliberative Process Privilege	DR Partners v. Board of County Com'rs of Clark County, 116 Nev. 616 (2000)	
7718		Draft document reflecting deliberations, thoughts, and impressions concerning changes to organizational structure within the City Manager's Office	Deliberative Process Privilege	DR Partners v. Board of County Com'rs of Clark County, 116 Nev. 616 (2000)	

Doc #	Email senders and recipients	Description	Basis for Redaction/Non-Production	Authority	Redaction
12153	City attorney staff and attorney(s)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
12154	City attorney staff and attorney(s)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
12156	City attorney staff and attorney(s)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
12164	City attorney staff and attorney(s)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re LVRJ Trosper records request	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
12185	City attorney staff and attorney(s)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re LVRJ Trosper records request	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
12189	City attorney staff and attorney(s)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re LVRJ Trosper records request	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
12328	City attorney staff and attorney(s)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
13422	Kim Becker (PIO), David Cherry (PIO), Javier Trujillo (Public Relations), Coery Clark (Parks and Recreation)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re presentation on fuel indexing	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
13423	Kim Becker (PIO), David Cherry (PIO), Javier Trujillo (Public Relations), Coery Clark (Parks and Recreation)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re presentation on fuel indexing	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
13425	Kim Becker (PIO), David Cherry (PIO), Javier Trujillo (Public Relations), Coery Clark (Parks and Recreation)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re presentation on fuel indexing	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
13428	Kim Becker (PIO), David Cherry (PIO), Javier Trujillo (Public Relations), Coery Clark (Parks and Recreation)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re presentation on fuel indexing	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction

EXHIBIT 6

Doc #	Email senders and recipients	Description	Basis for Redaction/Non-Production	Authority	Redaction
3		Internal report containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services and/or containing legal advice	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
181	Kristina Gilmore (attorney) and Laura Kopanski (paralegal) and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
184	Kristina Gilmore (attorney) and Laura Kopanski (paralegal) and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
191	Kristina Gilmore (attorney) and Laura Kopanski (paralegal) and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
193		Draft Trosper contract containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
195	Kristina Gilmore (attorney) and Laura Kopanski (paralegal) and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
199	Kristina Gilmore (attorney) and Laura Kopanski (paralegal) and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
226	Kristina Gilmore (attorney) and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
227	Kristina Gilmore (attorney) and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
233	Kristina Gilmore (attorney) and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
234	Kristina Gilmore (attorney) and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
237	Kristina Gilmore (attorney) and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
238	Kristina Gilmore (attorney) and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	

Doc #	Email senders and recipients	Description	Basis for Redaction/Non-Production	Authority	Redaction
244	Kristina Gilmore (attorney) and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
245	Kristina Gilmore (attorney) and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
246	Kristina Gilmore (attorney) and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
249	Kristina Gilmore (attorney) and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
251	Kristina Gilmore (attorney) and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
252	Kristina Gilmore (attorney) and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
267	Kristina Gilmore (attorney) and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
647		Employer Identification Number for tax return, possible SS#	Confidential personal information - Employer Identification Number	Donrey of Nevada, Inc. v. Bradshaw, 106 Nev. 630 (1990)	Redaction
669		Employer Identification Number for tax return, possible SS#	Confidential personal information - Employer Identification Number	Donrey of Nevada, Inc. v. Bradshaw, 106 Nev. 630 (1990)	Redaction
1362	David Cherry (PIO) Liz Trosper (agent), Robert Murnane (City Manager, Javier Trujillo (Public Affairs)	Electronic correspondence containing mental impressions and strategy of City management regarding preparation of public statement and comments on draft statement	Deliberative Process Privilege	DR Partners v. Board of County Com'rs of Clark County, 116 Nev. 616 (2000)	
1363	David Cherry (PIO) Liz Trosper (agent), Robert Murnane (City Manager, Javier Trujillo (Public Affairs)	Electronic correspondence containing mental impressions and strategy of City management regarding preparation of public statement and comments on draft statement	Deliberative Process Privilege	DR Partners v. Board of County Com'rs of Clark County, 116 Nev. 616 (2000)	
1364	David Cherry (PIO) Liz Trosper (agent), Robert Murnane (City Manager, Javier Trujillo (Public Affairs)	Electronic correspondence containing mental impressions and strategy of City management regarding preparation of public statement and comments on draft statement	Deliberative Process Privilege	DR Partners v. Board of County Com'rs of Clark County, 116 Nev. 616 (2000)	
1365	David Cherry (PIO) Liz Trosper (agent), Robert Murnane (City Manager, Javier Trujillo (Public Affairs)	Electronic correspondence containing mental impressions and strategy of City management regarding preparation of public statement and comments on draft statement	Deliberative Process Privilege	DR Partners v. Board of County Com'rs of Clark County, 116 Nev. 616 (2000)	
1366	David Cherry (PIO) Liz Trosper (agent), Robert Murnane (City Manager, Javier Trujillo (Public Affairs)	Electronic correspondence containing mental impressions and strategy of City management regarding preparation of public statement and comments on draft statement	Deliberative Process Privilege	DR Partners v. Board of County Com'rs of Clark County, 116 Nev. 616 (2000)	
1367	David Cherry (PIO) Liz Trosper (agent), Robert Murnane (City Manager, Javier Trujillo (Public Affairs)	Electronic correspondence containing mental impressions and strategy of City management regarding preparation of public statement and comments on draft statement	Deliberative Process Privilege	DR Partners v. Board of County Com'rs of Clark County, 116 Nev. 616 (2000)	

Doc #	Email senders and recipients	Description	Basis for Redaction/Non-Production	Authority	Redaction
1807	Kristina Gilmore (attorney), Brian Reeve (attorney) David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
1808	Kristina Gilmore (attorney), Brian Reeve (attorney) David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
1809	Kristina Gilmore (attorney), Brian Reeve (attorney) David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
2485	Josh Reid (attorney) and Gerri Schroeder (Council)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
2487	Josh Reid (attorney) and Gerri Schroeder (Council)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
2491	Josh Reid (attorney) and Gerri Schroeder (Council)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re HAD	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
3352		Internal report containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
3862	David Cherry (PIO) Liz Trosper (agent), Robert Murnane (City Manager, Javier Trujillo (Public Affairs)	Electronic correspondence containing mental impressions and strategy of City management regarding preparation of public statement and comments on draft statement	Deliberative Process Privilege	DR Partners v. Board of County Com'rs of Clark County, 116 Nev. 616 (2000)	
3864	David Cherry (PIO) Liz Trosper (agent), Robert Murnane (City Manager, Javier Trujillo (Public Affairs)	Electronic correspondence containing mental impressions and strategy of City management regarding preparation of public statement and comments on draft statement	Deliberative Process Privilege	DR Partners v. Board of County Com'rs of Clark County, 116 Nev. 616 (2000)	
3866	David Cherry (PIO) Liz Trosper (agent), Robert Murnane (City Manager, Javier Trujillo (Public Affairs)	Electronic correspondence containing mental impressions and strategy of City management regarding preparation of public statement and comments on draft statement	Deliberative Process Privilege	DR Partners v. Board of County Com'rs of Clark County, 116 Nev. 616 (2000)	
4016	Kristina Gilmore (attorney), Brian Reeve (attorney) David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
4056	Kristina Gilmore (attorney), Brian Reeve (attorney) David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
4057	Kristina Gilmore (attorney), Brian Reeve (attorney) David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
4058	Kristina Gilmore (attorney), Brian Reeve (attorney) David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
4078	Kristina Gilmore (attorney), Brian Reeve (attorney) David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
4083	Kristina Gilmore (attorney), Brian Reeve (attorney) David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
4084	Kristina Gilmore (attorney), Brian Reeve (attorney) David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	

Doc #	Email senders and recipients	Description	Basis for Redaction/Non-Production	Authority	Redaction
4090	Kristina Gilmore (attorney), Brian Reeve (attorney) David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
4091	Kristina Gilmore (attorney), Brian Reeve (attorney) David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
4092	Kristina Gilmore (attorney), Brian Reeve (attorney) David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
4093	Kristina Gilmore (attorney), Brian Reeve (attorney) David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
4094	Kristina Gilmore (attorney), Brian Reeve (attorney) David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
4095	Kristina Gilmore (attorney), Brian Reeve (attorney) David Cherry (PIO), Javier Trujillo (Public Affairs)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
4944	Kathy Blaha (PIO), Joanne Wershba (City staff), Ray Everhart (City staff)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
4954	Kathy Blaha (PIO), Joanne Wershba (City staff), Ray Everhart (City staff)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
4955	Kathy Blaha (PIO), Joanne Wershba (City staff), Ray Everhart (City staff)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
5249		Internal report containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
5253		Internal report containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
5695		Internal report containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
6759		Internal status report prepared by attorney containing legal thoughts, impressions, and advice concerning legal matters	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
6882	Kristina Gilmore (attorney), Josh Reid (attorney), Cheryl Navitskis (City Attorney Staff)	Electronic correspondence containing internal status report prepared by attorney containing legal thoughts, impressions, and advice concerning legal matters	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
6883		Internal status report prepared by attorney containing legal thoughts, impressions, and advice concerning legal matters	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
6958	Kristina Gilmore (attorney), Josh Reid (attorney), Cheryl Navitskis (City Attorney Staff)	Electronic correspondence containing internal status report prepared by attorney containing legal thoughts, impressions, and advice concerning legal matters	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
6959		Internal status report prepared by attorney containing legal thoughts, impressions, and advice concerning legal matters	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
6978	Kristina Gilmore (attorney) and/or Bud Cranor (PIO/Council Support Services)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	

Doc #	Email senders and recipients	Description	Basis for Redaction/Non-Production	Authority	Redaction
7009	Kristina Gilmore (attorney), Laura Kopanski (paralegal) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
7019	Kristina Gilmore (attorney) and/or Bud Cranor (PIO/Council Support Services)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
7059	Kristina Gilmore (attorney) and/or Bud Cranor (PIO/Council Support Services)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
7127	Kristina Gilmore (attorney) and/or Bud Cranor (PIO/Council Support Services)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
7199	Kristina Gilmore (attorney) and/or Bud Cranor (PIO/Council Support Services)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
7406		Internal status report prepared by attorney containing legal thoughts, impressions, and advice concerning legal matters	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
7496	Karina Milana (Public relations) and Kristina Gilmore (attorney)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
7507	Kristina Gilmore (attorney) and/or Bud Cranor (PIO/Council Support Services) and/or Luke Fritz (Finance)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract terms	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
7509	Karina Milana (Public relations) and Kristina Gilmore (attorney)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
7631	Karina Milana (Public relations) and attorney	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
7636	Karina Milana (Public relations), Kristina Gilmore (attorney) and Laura Kopanski (paralegal)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
7676		Correspondence between employee and supervisor relating to personal medical information of employee	Confidential personal medical information	Donrey of Nevada, Inc. v. Bradshaw, 106 Nev. 630 (1990)	
7678		Correspondence between employee and supervisor relating to personal medical information of employee	Confidential personal medical information	Donrey of Nevada, Inc. v. Bradshaw, 106 Nev. 630 (1990)	Redaction
7698	Karina Milana (Public relations) and Kristina Gilmore (attorney)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
7703	Karina Milana (Public relations) and Kristina Gilmore (attorney)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
7717	Laura Shearin (City Manager's Office), Jennifer Fennema (Human Resources)	Electronic correspondence containing mental impressions and strategy of City management regarding changes to organizational structure within the City Manager's Office	Deliberative Process Privilege	DR Partners v. Board of County Com'rs of Clark County, 116 Nev. 616 (2000)	

Doc #	Email senders and recipients	Description	Basis for Redaction/Non-Production	Authority	Redaction
7718		Draft document reflecting deliberations, thoughts, and impressions concerning changes to organizational structure within the City Manager's Office	Deliberative Process Privilege	DR Partners v. Board of County Com'rs of Clark County, 116 Nev. 616 (2000)	
12153	Cheryl Navitskis (City Attorney staff) and Josh Reid (attorney)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
12154	Cheryl Navitskis (City Attorney staff) and Josh Reid (attorney)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
12156	Cheryl Navitskis (City Attorney staff) and Josh Reid (attorney)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re Trosper contract	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
12184	Michael Naseem (City Attorney staff) and Josh Reid (attorney)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re LVRJ Trosper records request	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
12185	Michael Naseem (City Attorney staff) and Josh Reid (attorney)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re LVRJ Trosper records request	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
12189	Michael Naseem (City Attorney staff) and Josh Reid (attorney)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re LVRJ Trosper records request	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	
12328	Sally Galati (attorney) and Rory Robinson (attorney)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
13422	Kim Becker (PIO), David Cherry (PIO), Javier Trujillo (Public Relations), Coery Clark (Parks and Recreation)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re presentation on fuel indexing	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
13423	Kim Becker (PIO), David Cherry (PIO), Javier Trujillo (Public Relations), Coery Clark (Parks and Recreation), Shari Ferguson (Parks and Recreation), Adam Blackmore (Parks and Recreation)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re presentation on fuel indexing	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
13425	Kim Becker (PIO), David Cherry (PIO), Javier Trujillo (Public Relations), Coery Clark (Parks and Recreation)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re presentation on fuel indexing	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction
13428	Kim Becker (PIO), David Cherry (PIO), Javier Trujillo (Public Relations), Coery Clark (Parks and Recreation), Shari Ferguson (Parks and Recreation), Adam Blackmore (Parks and Recreation)	Electronic correspondence containing communication between attorney and staff made for the purpose of facilitating the rendition of professional legal services re presentation on fuel indexing	Attorney Client Privilege/Work Product Doctrine	NRS 49.095	Redaction