2014
OPEN MEETING LAW and Legislative Amendments

Presented by
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2013 Legislative amendments to NRS chapter 241 – the OML

SUMMARY OF LEGISLATIVE CHANGES IN AB 65

1. **Exceptions and Exemptions to OML are now legislatively defined.**
2. **The process for appointing a designee to a public body is defined.**
3. **The process to "cure" an OML violation with corrective action is defined.**
4. **"Deliberate" is defined.**
5. **Supporting material "contact" person must be included on every agenda.**
6. **Certain public bodies must upload supporting materials to its webpage.**
7. **No requirement to electronically send supporting material to requester unless delivery by electronic mail is feasible and the requester has agreed to receive it electronically.**
8. **"Present" is defined**

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Exemption or Exception from the OML Does your public body have one?

- A meeting, hearing, closed meeting or any other proceeding is excepted from the provisions of the OML if authorized by law.
- The scope of any statutory exception must be explicitly described.
- Exemptions are statutorily defined: The Legislature, Judicial proceedings and meetings of the Parole Board when acting on a parole application.

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Designee/alternate appointment

- A member of a public body may not designate another person to attend the meeting of a public body in place of the member unless:
  - Such designation is authorized by statute, or by the public body's creation document;
  - Designation must be in writing or made on the record;
  - Designee may exercise same powers as the member and may be counted towards quorum.

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Corrective Action, or "Cure" when a violation occurs.

- Public body now has statutory right to take voluntary Corrective action for an inadvertent violation and avoid an investigation by the A.G.
- Notice of possible "corrective cure" must be given on next agenda;
- A.G.'s limitations period for bringing action is extended by 30 days.
- Public body must "cure" within 30 days of the alleged violation. Cure is prospective only!

5

Statutory definition of "Deliberate"

- "Deliberate" means collectively to examine, weigh and reflect upon the reasons for or against the action. The term includes, without limitation, the collective discussion or exchange or facts preliminary to the ultimate decision."
- Legislature eliminated "collective acquisition of facts" from *Dewey* definition (2003)

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Supporting Documents

- **The name and contact information for a designated person who keeps supporting material for the public body and a list of locations where the supporting material is available to the public, must be included on every agenda.**

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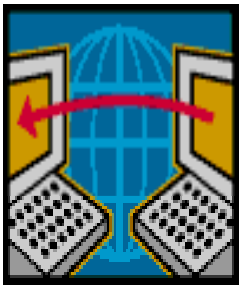
Governing bodies of cities and counties with a population greater than 45,000 must upload supporting materials to its website



- Material provided to the governing body during its meeting must be uploaded to its website within 24 hours of adjournment of the meeting.
- The right of the public to request a copy of the material pursuant to NRS 241.020(5) is not eliminated.
- Technical problems with the upload does not constitute a violation of the OML.

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2013 legislative amendments do not require any public body to electronically send supporting materials to a requester

- If a requester of supporting documents has agreed to receive supporting materials by email the public body shall, if feasible, provide it electronically, but this service is only supplementary to the right of the public to request materials over the counter.

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Definition of "present"

- This definition codifies longstanding usage.
- Physically present or electronically present by video conference or teleconference, but not by social media, chat rooms or by email.

- The public must be able to hear and/or view the public body and be able to comment when appropriate.

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State's new webpage for public notices for all public bodies

- Beginning January 1, 2014, all public bodies must post public notice of its meetings on the State's official website, to be constructed by the Department of Administration.
- Local governments are exempt from this requirement until July 1, 2014.

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SB 74 (2013)

- NRS 241.035(2) has been amended to require all public bodies to make available minutes or audio recordings upon request to a member of the public at no charge.
- Minutes of public meetings are public records.
- This requirement is effective October 1, 2013 (SB 74, 2013)

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…THE DEFINITION OF PUBLIC BODY…

- … was amended in 2011:
- manner of creation is primary criteria for definition.
- P.B. must be an administrative, executive, legislative, or advisory body supported by tax revenue.
- Blue Ribbon Commissions appointed by Governor; New definition is careful to not ensnare staff committees.
- Non-profits; public/private partnerships?

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What is a Meeting? Requirements:

- Quorum of members of a public body must be present either collectively or serially together with deliberation and/or action:
- Deliberation toward a decision on a matter within the public body's jurisdiction, control, supervision or advisory power, and/or:
- Action: which means making a decision, commitment or promise; (NRS 241.015(1)) over a matter within the public body's supervision, jurisdiction, control or advisory power.

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Is this a meeting?

- At a meeting of a standing subcommittee a quorum of the parent public body attends;
- The members of the parent body arrived separately; did not sit together and did not speak to each other before or after the meeting.
- None spoke during the meeting, they only observed.

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No, we opined there was no meeting.

- The OML does not specifically prohibit members of a public body from attending a meeting of its own standing committee.
- Supreme Court opinion: explicitly states that the OML only applies when a quorum of a public body acts **in its official capacity as a body, n**ullifying any argument that mere attendance by a quorum is at the same time deliberating as a public body.
- Example: polling or collective discussion, would indicate a meeting. OMLO 2010-06 (Sept. 10, 2010)

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More Examples:

- Two or more public bodies meet together to discuss common issues. Meeting? Op. Nev. Att'y Gen. 2001-05 (March 14, 2001) Which body notices the meeting?
- A quorum meets in front of the dais following adjournment of the noticed public meeting. Discussion was of matters not appearing on the agenda. Is this okay?
- What if less than a quorum of members meet to discuss public business? What about pending matters within the public body's jurisdiction and control? Is this a violation?
- What if there is no physical meeting, only faxes among quorum, in which the members are asked for feedback (meaning approval) on a draft press release. *Del Papa v. Board of Regents, 114 Nev. 388 (1998).*

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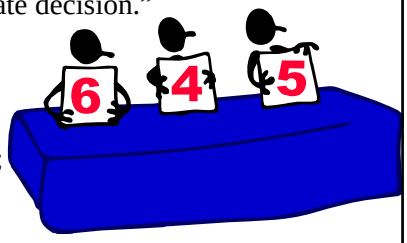
Critical Definitions to understanding How public Bodies conduct business

- Deliberation is now legislatively defined. It means: "collectively to examine, weigh and reflect upon the reasons for or against the action. The term includes, without limitation, the collective discussion, or exchange of facts preliminary to the ultimate decision."



- Action means voting, and it includes a promise or commitment;
  - secret ballots or secret promises have always been in violation of the OML.
  - Action is an affirmative vote by a majority of the members during a public meeting; there is a difference between elected body and appointed body requirements for action.

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Deliberation's finer points

- Is deliberation necessary? Before voting? On any matter? Whether on the agenda or not?
- Is deliberation necessary during discussion items? On the consent agenda?
- What constitutes an "action" item? Approval of the minutes and/or agenda? Adjournment?
- Gathering of facts during agenda presentation even if not an action item?
- 2013 legislative amendment to definition of deliberate.
- What if quorum of p.b. wants to meet privately with Board of Directors of business in town that's about to cease business. P.B. only wanted to "collect facts" regarding business decision?

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"Deliberation" / "Discussion" Synonymous?

- Why does it matter to you?
- In NRS 241.020(2)(c), it states that public comment must come after the public body "discusses" the action item but before it takes action?
- 2013: new Legislative definition: it is the collective **discussion** or exchange of facts, prior to ultimate decision that constitutes **"deliberation."**
- **"Gathering of facts"** no longer in definition!!

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Action

- How many ways can a quorum of a public body take "action"?

  A decision is a commitment or promise whether it is by a show of hands or otherwise signified so that a reasonable person would understand that a decision had been made.
- Questions about whether a public body took action is seldom encountered.
- Usually the issue is no notice that action would be taken.

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Agenda Basic Rule "Clear and Complete" rule

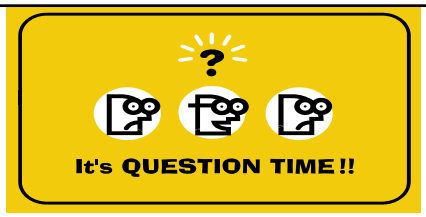
NRS 241.020(2)(c)(1)

- Cornerstone of OML
- Nevada S.Ct.: *Sandoval v. Bd. Of Regents, 119 Nev. 148 (2003);*
- *Rejected the so-called "germane" standard.*
- *Agenda topics must be specific to alert the public to topics that will be discussed.*

The agenda: "Is it clear and complete" ??

- Does the agenda item provide complete list of topics scheduled for consideration by the public body?
- Related matters to a agenda topic may not be discussed or the public body may have strayed from the agenda.
- Sandoval v. Bd. Of Regents, 119 Nev. 148
- AG's Manual sec. 7.02 and 7.03

Are these items "clear and complete?"



- Many public bodies have used the following phrase on their agenda:

  "…. and all matters related thereto."
- How about an agenda item announcing negotiations on a new city franchise agreement for waste disposal. In part it stated: "…. [public body will] address general issues relating to the upcoming franchise renewal for waste disposal, including **special provisions for inclusion in a new franchise agreement(s)**." [see next slide for result]

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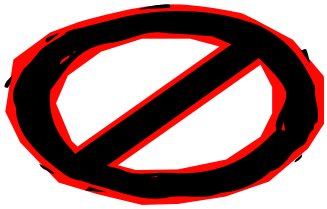
No! After investigation it was determined **not to be clear and complete.**



Review of meeting video showed a motion had been made to direct staff to include mandatory trash service as a part of the bidding process for franchise agreement renewal or perhaps obtaining new services from other contractors.

- ✓ **"higher degree of specificity is needed when the subject to be debated is of special or significant interest to the public."** *Sandoval v. Board of Regents of the University and Community College System of Nevada,* 119 Nev. 148, 154-155, 67 P.3d 902, 905-906 (2003).
- ✓ *We found that the matter of mandatory trash pickup and billing issues were of a significant interest to the public. The agenda item was not clear and complete. Public body "cured" violation at next meeting.*

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Another important Public Meeting Basic rule

Stick to the Agenda: Members and/or counsel must prevent public body discussion from wandering to related topics;

Example: Board of Regents agenda item:

"Review state, federal statutes, regulations, case law and policies that govern the release of materials, documents, and reports to the public."

So far, so good. But …[next slide]

Board strayed from topic despite warning from counsel!

- Board discussed details of a Nevada Division of Investigation report into an incident on the UNLV campus; Board criticized the UNLV police department, and commented on the impact of drug use on campus among other items of discussion. Counsel warned the Board that they were straying from the agenda on several occasions.
- Supreme Court opinion said: Agenda did not inform public that these matters would be topic of discussion.
- Court rejected the "germane" standard for agenda items.
- *Sandoval v. Board of Regents of the University and Community College System of Nevada,* 119 Nev. 148 (2003).

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OPENNESS IS THE NORM, NOT THE EXCEPTION;

The OML is:

"…for the public benefit and should be liberally construed and broadly interpreted to promote openness in government."

Dewey v. Redevelopment Agency of City of Reno, 119 Nev. 87, 94 (2003)

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…But, the *Dewey Court also said:*

- OML does not prohibit every private discussion of a public issue by members of public body or even forbid lobbying for votes, but;
- …a quorum must not be involved.
- see: *McKay v. Bd of County Commissioners, (103 Nev. 490 (1987)) members of public bodies may discuss matters with colleagues, but the "OML only prohibits collective deliberations or actions where a quorum is present."*

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Serial communication amongst a quorum of a public body is prohibited!

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Are Serial Briefings a Meeting?

- No! In *Dewey* 119 Nev. At 94, 64 P. 3d at 1075, the Nevada Supreme Court stated that private briefings among staff of a public body and a non-quorum of members of a public body is not a meeting for purposes of the Open Meeting Law, and such a meeting is not prohibited by law.
- But stay away from "serial quorum" or "walking quorum" or "constructive quorum. All terms are synonymous.

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What if members contact each other outside a public meeting?

- Social functions;
- Conventions even if out of state;
- Non-meetings with counsel to discuss potential or pending litigation;
- If less than a quorum members may discuss public business, but your counsel may frown on this activity.
- Supreme Court in *Dewey v. Redevelopment Agency of City of Reno, 119 Nev. 87, 94 (2003)* has taken a dim view of action in the "shadows"

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Appointment Process for an Appointed public officer, or one who serves at the pleasure of the public body

- NRS 241.031; and NRS 241.030(4)(e)
- A continuing source of confusion and controversy;
- 1989 S.Ct case: "all consideration, deliberation, discussion and selection" must be done in public.

Public Officer Appointment process

- The Nevada Supreme Court explicitly stated that the OML applies only to an appointment process conducted by a public body. NRS 241.031;
- **Public officer** is defined in NRS 281.005 to mean a person elected or appointed to a position which: (a) Is established by the Constitution or a statute of this State, or by a charter or ordinance of a political subdivision of this State; and (b) Involves the continuous exercise, as part of the regular and permanent administration of the government, of a public power, trust or duty."

What is a public officer?

- NRS 281.005;
- Creation of position;
- Duties must be prescribed by statute; not prescribed by superiors;
- Tenure?;
- Power to hire or fire?

Mullen v. Clark County, 89 Nev. 308 (1973)

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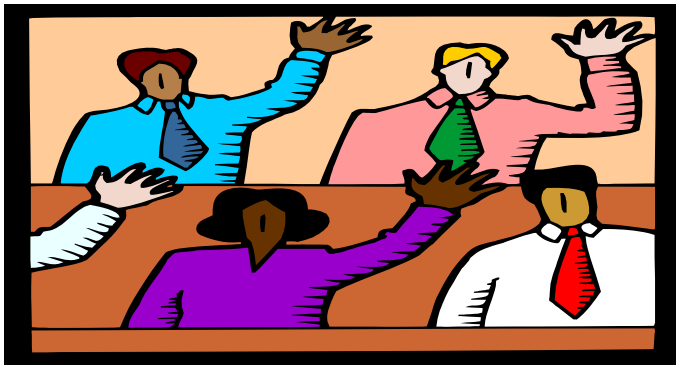
Committees subject to OML

- AG's Manual states: "…to the extent that a group is appointed by a public body and is given the task of making decisions for or recommendations to the public body, the group would be governed by the Open Meeting Law."



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"Committees/subcomittees/… or any subsidiary thereof."

- If a sub-committee **recommendation to a parent body** is more than **mere fact-finding** because the sub-committee has to choose or accept options, or decide to accept certain facts while rejecting others, or if it has to make any type of **choice** in order to create a **recommendation**, then it has participated in the decision-making process and is subject to the OML. (unless specifically exempted by statute.)
- OML Manual: section 3.04

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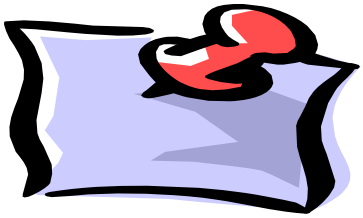

Important new agenda notice requirements

NRS 241.020: Public body must state on agenda that:

- Action items must be labeled "for possible action,"
- items may be taken out of order and/or
- Items may be combined removed at any time.
- Most importantly: public comment restrictions must appear on the agenda.
- 2013 Legislature

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Our Constitution is not a "Sunshine Law"

- Strong arguments can be made that the First Amendment could and should be interpreted to include a right of public access to the meetings of public bodies. However appealing that interpretation may be, it has not been adopted by the courts.

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Because …

- U.S. Supreme Court has repeatedly has held that there is no First Amendment right of access in the public or the press to judicial or other governmental proceedings.
  Gannett Co. v. DePasquale, 443 U.S. 368, 404, 99 S.Ct. 2898, 61 L.Ed.2d 608 (1979) (Rehnquist, J., concurring)
- Violation of an open meeting law does not constitute a violation of due process.
- However, once the government has opened a limited public forum [thereafter] it must respect the lawful boundaries [of speech] it has itself set. Content of speech may be regulated but viewpoint may not be regulated. 1st Amendment rights are protected within the contour of the type of forum.
- *Rosenberger v. Rector & Visitors of the Univ . of Va.*, 515 U.S. 819, 829 (1995);

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Types of public forums

- The existence of a right of access to public property and limitations on access depends on the character of the property.
- Traditional public forum: streets and parks; Government may not limit content based comment/communication unless a compelling state interest has been shown.
- Limited public forum or designated public forum: Public property traditionally not opened to public communication. State may reserve forum for intended purposes which means content restriction is okay as long as the state does not restrict comment based on viewpoint. Public may be restricted to comment on agenda items or matters within the public body's jurisdiction and control.
- Non-public forum: courthouse, federal and state buildings and other venues. Same speech restrictions as for limited public forum.
- *Perry v. Perry Local Educators' Assn, 103 S.Ct. 948, 954-955 (1983).*
- *Fact: elementary school principal calls police during student arrival at school because four men were handing our bibles in front of school. Public forum? Need to contact school beforehand?*

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Public comment violation may be a Constitutional violation

- Citizens may sue public body, individual members, and the State or political subdivision based on allegaton of violation of first amendment right to free speech. *Norse v. City of Santa Cruz,* 629 F. 3d 966 (9th Cir. 2010). (USCA 42 section 1983)
- Entire public meeting (beginning to end) is a limited public forum; first amendment rights extend through out the meeting subject to reasonable time place and manner restrictions, even content restriction if viewpoint neutral.
- Facts: provocative silent Nazi salute from rear of audience caused ejection from meeting.
- En banc court reversed lower court ruling in favor of city. Court said "salute was momentary and casual, causing no disruption at all."
- Court: "Speech must actually disrupt, disturb or impede the orderly conduct of a meeting before speaker may be ejected."

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Basis for suit in Federal Court

- 42 U.S.C.A. § 1983:
- Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress

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1st Amendment: public comment Issues; the OML authorizes a public body (limited public forum) to:

- restrict public speakers to the subjects within its supervision, control, jurisdiction or advisory power;
- limit public comment if the "speech becomes irrelevant or repetitious."
- apply reasonable time limitations,
- limit caustic personal attacks.
- **But it forbids a public body from limiting public comment based disagreement with "viewpoint" of the speaker.**
- **NRS 241.020(2)(c)(3)(II)(public may comment on any matter not on the agenda as an action item)**

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Rules of Decorum

Recommended for some public bodies

- Provide guidelines before discipline or ejection;
- "Persons addressing public body shall not make personal, impertinent, slanderous or profane remarks … loud, threatening, abusive language, or other disorderly conduct that actually disrupts, disturbs or impedes the orderly conduct of meeting."
- Warning;
- Resisting removal;
- Penalty.

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Legislative Immunity from Suit. Criteria for determining if immunity is appropriate

- 1. Policy decision or ad hoc decision making?
- 2. Does act apply to few people or to many?
- 3. Is the act formally legislative in character?
- 4. Is it in traditional legislative form?
- *Norse v. City of Santa Cruz,* 629 F.3d 966 (2010)

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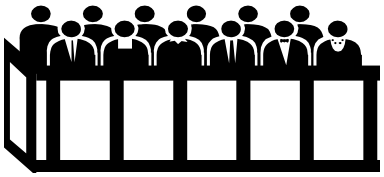
Qualified immunity

- Qualified immunity: government official is entitled to qualified immunity, an affirmative defense to suit, unless he knew or should have known the act in question violated a clearly established statutory or constitutional right.



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Public comment pitfalls

- Halting a citizen's comment based on belief defamation is occurring.
- Halting comment based on viewpoint of speaker.
- Halting critical comment of public official,
- But … comment can be stopped if it strays from scope of agenda topic; or if an actual disturbance occurs.

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There must be an actual disruption or disturbance before a person may be ejected ?

- A person or persons who "willfully disrupts a meeting to the extent its orderly conduct has been made impractical."
- "removing an individual from a public meeting does not violate the Constitution *provided that* the individual is sufficiently disruptive and is not removed because of his or her [expressed] views" *Dehne v. City of Reno,* 222 Fed. Appx. 560, 562 (9th Cir. 2007)

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Public comment …
It's all about Choice

Choice for public bodies between alternatives:

1. 1st alternative: two p.c. periods on each agenda; One before any action item has been considered, and another period of p.c. before adjournment.
2. Or. Second alternative: P.c. must be heard before a public body takes action on any action item but after it has discussed the matter. And the public body must allow one more period of p.c. before adjournment.
   - And, public bodies may augment either, or both alternatives with additional opportunity to comment. Statutory alternatives are minimum requirements – a "floor" not a "ceiling".

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Remedies if Violation occurs

- Void action; and/or seek injunctive relief;
- Corrective Action: 2013, AB 65, section 4; AG OML manual, section 11.
- Private Lawsuits: NRS 241.037(2)
- Criminal Misdemeanor: NRS 241.040
- Civil monetary fines (NRS 241.0395)
- All of these remedies are now supported by subpoena authority!! (NRS 241.039).

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Subpoena Authority: NRS 241.039

- AG may issue administrative subpoena for the production of "relevant documents, records or materials" in any OML investigation…
- Willful failure to comply may result in prosecution for misdemeanor.

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What is an administrative subpoena?

- Administrative investigatory power is backed by authority to issue subpoenas.
- Administrative agencies possess no inherent power to issue subpoenas; delegation is necessary.
- Without subpoena, power to obtain information needs consent; subpoena is coercive.
- Enforcement for disobedience may be through the courts, or:
- NRS 241.039: A person who willfully disobeys the subpoena is guilty of a misdemeanor.

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PENALTY For OML Violation

Violator must have knowledge of the OML violation

He/she must have participated in action which violated the OML.

Fine: up to $500.00

1 year limitations period for bringing an action.

This cause of action belongs solely to the Attorney General.

(see next slide)

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How to avoid Violation

- Enforcement against a member of a public body based on "participation" may only occur when the member makes a commitment, promise, or casts an affirmative vote to take action on a matter under the public body's jurisdiction or control when the member knew his/her commitment, promise, or vote was taken in violation of the OML.

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More about how to avoid violation

- The civil penalty amendment requires that a public body take action in order for the civil penalty to be potentially applicable. "Action" is defined in NRS 241.015(1) as an affirmative act; mere silence or inaction by members is not sufficient to rise to the level requiring enforcement.
- This office would not seek to punish individual members who attempt to comply with the OML, only those that actually violate it.

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A short public records primer;

Are you a public officer serving on a public body whether appointed or elected?
How safe are your private emails?

U.S. Constitution, Source of our "right to privacy".

- Right to privacy has constitutional source. (Also speech, religion, press, assembly and petition among others.)
- The substantive component of the XIV Amendment; and Article I, section 8(5)(due process clause of the Nevada Constitution), protects an asserted right to privacy that is recognized as being "deeply rooted" in tradition and history and so "implicit in the concept of ordered liberty" that "neither liberty nor justice would exist if [it] were sacrificed," the asserted right is a fundamental one.
- *Eighth Judicial District Court v. Logan D.*--- P.3d ----, 2013 WL 3864448 (Nev.), 129 Nev. Adv. Op. 52

Privacy vs. public records

- FOIA; 42 USCA 552 requires federal agencies to make certain records publicly available.
- Exemptions are narrowly construed by courts
- Agency must make an “adequate” search for public records request; “reasonableness” test;
- Agency declarations are presumed to be in good faith.

Privacy vs. public records

- Requester asked for any and all E.P.A. records (limited to senior officials) indicating that E.P.A. may have deliberately slowed or “delayed” issuance of a controversial regulation until after the 2012 presidential election.
- Court found that further discovery was necessary regarding “possible exclusion of relevant personal emails” of certain high level E.P.A. officials.
- Court noted the existence of a congressional investigation into whether the E.P.A. regularly used private communications (emails) to conduct agency business to avoid FOIA obligations.

Privacy vs. public records

- District Court stated that the "record left open the possibility that … the agency engaged in bad faith conduct by excluding the top politically appointed leaders of the E.P.A. from its initial response to the FOIA request.
- Court ordered discovery be conducted into whether and to what extent high E.P.A. Officials utilized personal email accounts to conduct official business.

Landmark Legal Foundation, --- F. Supp.2d ---, 2013 WL 4083285 (D.D.C.) (August 14, 2013)

Privacy vs. public records

Here's another example of a (FOIA) request for personal texts, email and twitter records:

A reporter for newspaper filed a FOIA request with City of Champaign seeking "All electronic communications, including cellphone text messages, sent and received by members of the city council and the mayor during city council meetings. Request specifically applied to both city issued and personal cellphones, and city issued or personal email addresses and Twitter accounts.

City of Champaign v. Madigan, --- N.E. 2d ---, 2013 IL App. (4th) 120662 (July 16, 2013)

Privacy vs. public records

- Personal email records between school board members that did not document a transacition or activity of the district were found not to be public records although similar records on agency computers were disclosed.
- Location of emails on agency computer did not automatically imply it was a public record even if use of the computer violated agency policy that explicity stated user had no expectation of privacy.
- But, an individual school board member acting in his or her official capacity constitutes agency activity when discussing agency business, implying that it is subject to records request regardless of where the email is found – on a personal computer or an agency computer.
- *Easton Area School District v. Baxter,* 35 A.2d 1259 (January 24, 2012)(on judicial review of order by Office of Open Records to provide reuester with all records responsive to his request.)

D.R. Partners v. Board of County Commissioners (Clark)

- LVRJ sought to compel Clark county to disclose billing statements that documented county officials use of publicly owned cell phones.
- Redacted records were released.
- R.J. filed petition for mandamus to compel release of unredacted records.
- S.Ct. found that Clark county failed to provide court with a particularized evidentiary showing that would have allowed a balancing of interests test. Court reversed trial court and ordered release of unredacted billing records. *D.R. Partners v. Board of County Commissioners,* 116 Nev. 616(2000).

Reno Newspapers v. Sheriff

- Nev. Supreme Court determined that the identity of the holder of a concealed firearms permit is a public record, and it also included records of any post permit investigation, suspension, or revocation. This issue obviously raised the issue of personal privacy.
- Court noted governmental interests under balancing test is more narrowly interpreted by virtue of 2007 legislative amendments. Conversely open and accessible government must be more liberally interpreted. State's burden is heavier now. It must prove that its interest in non-disclosure "clearly outweighs the public's right of access."
- *Reno Newspapers v. Sheriff, 126 Nev. __, (2010)*

Reno Newspapers v. Jim Gibbons

- Newspaper filed petition for writ of mandamus for access to Gov. Gibbon's emails while he was in office.
- Court began its opinion from presumption that all government generated records are open to disclosure.
- Disclosure is subject to statutory provision of confidentiality;
- Absent provision of confidentiality then balancing of interests applies.

Reno Newspapers v. Jim Gibbons

- 104 emails were identified.
- Court reversed and remanded to trial court with instructions to review a specially prepared log that described each email. Trial court Judge was instructed to apply the balancing test to each requested email. *Reno Newspapers Inc. v. Jim Gibbons,* --- P.3d ---, 2011 WL 6268856 (Nev.); 127 Nev. Adv. Op. 79

2013 public records legislative agenda

- AB 31
- SB 74

QUESTIONS OR COMMENTS?

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Senior Deputy Attorney General

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AG's Open Meeting Law Manual
(11th ed., June 2012)

- Statutory provisions
- Explanation of requirements
- Examples
- Compliance checklists
- Sample Forms: agenda, minutes and notice of meeting to consider a person's character, etc.
- Available on the Attorney General's website at:www.ag.state.nv.us/Open Meeting law (link)

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QUESTIONS OR COMMENTS?

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