

1 OFFICE OF THE ATTORNEY GENERAL
2 STATE OF NEVADA

3 In the matter of:
4 LAS VEGAS CITY COUNCIL

OAG FILE NO.: 13897-381
**FINDINGS OF FACT AND
CONCLUSIONS OF LAW**

7
8 **BACKGROUND**

9 Daniel Rolle filed a complaint¹ with the Office of the Attorney General (“OAG”)
10 alleging violations of the Nevada Open Meeting Law (“OML”) by the Las Vegas City Council
11 (“Council”), which may be summarized as follows:

12 **ALLEGATION NO. 1:** The Council places time restrictions on public comment
13 when activists are present at meetings and selectively changes these time
14 limitations based on the content of the public comment.

15 **ALLEGATION NO. 2:** The Council demands that only “positive” comments be
16 addressed to the Council during public comment.

17 **ALLEGATION NO. 3:** The Council improperly makes comments in response to
18 comments made by members of the public, in violation of the Council’s restriction on
19 the same.

20 **ALLEGATION NO. 4:** The Council uses intimidation tactics on members of the
21 public that effectively chills public comment.

22 **ALLEGATION NO. 5:** The Council violated the Open Meeting Law for having an
23 individual pulled from a meeting and cited for a misdemeanor for interrupting the
24 Council during the July 22, 2020 Council meeting.

25
26 ¹ Mr. Rolle filed an initial OML Complaint dated November 23, 2020, with allegations of
27 possible OML violations at the Council’s November 4, 2020 and November 8, 2020
28 meetings. Subsequently, Mr. Rolle alerted the OAG to additional allegations of OML
violations by the Council at its March 3, 2021 meeting. Both these complaints will be
addressed herein.

1 The OAG has statutory enforcement powers under the OML and the authority to
2 investigate and prosecute violations of the OML. NRS 241.037; NRS 241.039; NRS
3 241.040. The OAG’s investigation of the Complaint included a review of the following:

- 4 1. The Complaint dated November 23, 2020 and all attachments thereto;
- 5 2. The response by the Council to the November 23, 2020 Complaint filed on
6 behalf of the Council and all attachments thereto;
- 7 3. The video recording of the November 4, 2020 Council meeting;²
- 8 4. The video recording of the November 18, 2020 Council meeting;³
- 9 5. The supplemental allegations made by Mr. Rolle during the Council’s March
10 3, 2021 meeting;
- 11 6. The response by the Council to the supplemental allegations and all
12 attachments thereto;
- 13 7. The video recording of the March 3, 2021 Council meeting;⁴ and
- 14 8. Prior OML decisions, case law, and portions of the Nevada Revised Statutes
15 relevant to the Complaint.

16 After investigating the Complaint, the OAG determines that the Council violated
17 the OML by placing improper content-based restrictions on public comment.

18 FINDINGS OF FACT

19 1. The Las Vegas City Council is a “public body” as defined in NRS 241.015(4)
20 and therefore is subject to the OML.

21 2. The Council is comprised of seven (7) councilmembers, including Mayor
22 Carolyn Goodman, Mayor Pro Tem Stavros Anthony, Councilman Brian Knudsen,
23 Councilwoman Victoria Seaman, Councilwoman Olivia Diaz, Councilman Cedric Crear,
24 and Councilwoman Michele Fiore.

25 ² The OAG reviewed the Council’s November 4, 2020 meeting at:
26 <https://lasvegas.primegov.com/Portal/Meeting?compiledMeetingDocumentFileId=15689>.

27 ³ The OAG reviewed the Council’s November 18, 2020 meeting at:
28 <https://lasvegas.primegov.com/Portal/Meeting?compiledMeetingDocumentFileId=15686>.

⁴ The OAG reviewed the Council’s March 3, 2021 meeting at:
<https://lasvegas.primegov.com/Portal/Meeting?compiledMeetingDocumentFileId=17343>.

1 3. The Council held a public meeting on November 4, 2020. The agenda for the
2 November 4, 2020 meeting indicated forty-seven (47) agenda items.

3 4. As part of its November 4, 2020 meeting, the Council agendized the first public
4 comment session as Agenda Item No. 5, "Public Comment". Under that agenda item, the
5 agenda read:

6 Public comment during this portion of the Agenda must be limited to matters
7 on the Agenda for action. If you wish to be heard, come to the podium and give
8 your name for the record. The amount of discussion, as well as the amount of
time any single speaker is allowed, may be limited.

9 5. When Agenda Item No. 5 (Public Comment) was called, Mayor Goodman
10 indicated that public comments would be limited to one (1) minute per speaker.

11 6. A total of four (4) individuals made public comment. The first public speaker
12 indicated that she was getting minutes donated from two (2) other individuals who were
13 present, and thus the Council set that speaker's time to three (3) minutes, one for each
14 person. The other three (3) speakers made their comments without any additional
15 extensions recognized on the record by the Council.

16 7. Some members of the public who addressed the Council took off their masks
17 while speaking at the podium without being asked to do so. However, for those individuals
18 who had their masks on, Mayor Goodman requested the speakers to take their masks down
19 for two seconds to take a photo ID of the individual for the record. Mayor Goodman noted
20 that the speakers could continue speaking without the mask if they chose or could put them
21 back on. No speakers objected to Mayor Goodman's request to lower their masks for the
22 record prior to making their comments.

23 8. Also as part of its November 4, 2020 meeting, the Council agendized a second
24 public comment session as Agenda Item No. 46, "Citizens Participation". Under that
25 specific agenda item, the agenda stated:

26 Citizens Participation: Public comment during this portion of the agenda must
27 be limited to matters within the jurisdiction of the City Council. No subject
28 may be acted upon by the City Council unless that subject is on the agenda and
is scheduled for action. If you wish to be heard, come to the podium and give

1 your name for the record. The amount of discussion on any single subject, as
2 well as the amount of time any single speaker is allowed, may be limited.

3 9. When Agenda Item No. 46 (Citizens Participation) was called, Mayor
4 Goodman indicated that public comments would be limited to two (2) minutes per speaker.

5 10. Three (3) speakers made comments during Agenda Item No. 46 (Citizens
6 Participation).

7 11. The Council also held a meeting on November 18, 2020. The agenda for the
8 November 18, 2020 meeting indicated a total of seventy (70) agenda items.

9 12. As part of its November 18, 2020 meeting, the Council agendized the first
10 public comment session as Agenda Item No. 5, "Public Comment". Under that agenda item,
11 the agenda read:

12 Public comment during this portion of the Agenda must be limited to matters
13 on the Agenda for action. If you wish to be heard, come to the podium and give
14 your name for the record. The amount of discussion, as well as the amount of
15 time any single speaker is allowed, may be limited.

16 13. When Agenda Item No. 5 (Public Comment) was called, Mayor Goodman
17 invited members of the public who wished to make public comment to come forward, state
18 their names for the record, and "let us take a look at you on camera too, at which point you
19 can put the mask right back up."

20 14. Agenda Item No. 63 of the November 18, 2020 meeting was noticed on the
21 agenda as follows:

22 78578 – PUBLIC HEARING – APPLICANT/OWNER: GEORGE TONY
23 LOPEZ, ET AL – For possible action on the following Land Use Entitlement
24 project requests on 1.28 acres at 1616 Sunset Drive (APN 139-19-812-011), M
25 (Industrial) Zone, Ward 5 (Crear). Staff recommends DENIAL on the Land
26 Use Entitlement project. The Planning Commission (7-0 vote) recommends
27 APPROVAL on the land Use Entitlement project.

28 15. When Agenda Item No. 63 was called, a presentation was made by Ricky
Barlow. After Mr. Barlow's presentation, Mr. Rolle was afforded time to make public
comment on the same agenda item.

1 16. Also as part of its November 18, 2020 meeting, the Council agendized a second
2 public comment session as Agenda Item No. 68, "Citizens Participation". Under that
3 specific agenda item, the Council noted:

4 Citizens Participation: Public comment during this portion of the agenda must
5 be limited to matters within the jurisdiction of the City Council. No subject
6 may be acted upon by the City Council unless that subject is on the agenda and
7 is scheduled for action. If you wish to be heard, come to the podium and given
8 your name for the record. The amount of discussion on any single subject, as
9 well as the amount of time any single speaker is allowed, may be limited.

10 17. When Agenda Item No. 68 (Citizens Participation) was called, the public was
11 informed that public comments would be limited to one (1) minute per speaker.

12 18. Mr. Rolle was afforded an opportunity to make public comment during Agenda
13 Item No. 68, but was interrupted by the Council during his comment.

14 19. The Council held a public meeting on March 3, 2021, to which Mr. Rolle
15 attended.

16 20. Mr. Rolle alleges that during the public comment portion of the March 3, 2021,
17 a City Marshal approached him and stood next to him in the aisle as he was waiting to
18 provide public comment.

19 21. Mr. Rolle was able to address the Council and provide his public comment at
20 the March 3, 2021 meeting.

21 LEGAL STANDARDS AND CONCLUSIONS OF LAW

22 1. **The Council is able to place reasonable time, place, and manner
23 restrictions on public comment but may not restrict comments
24 based on content or the speaker's viewpoint.**

25 The OML does not mandate that members of the public be allowed to speak during
26 meetings except during those periods statutorily required. However, once the right to
27 speak has been granted by the Legislature, *e.g.*, NRS 241.020(3)(d)(3), the protections of
28 free speech by the U.S. Constitution and Nevada Constitution attach. *See In re: Incline
Village General Improvement District*, OAG File No. 11-024 (November 21, 2011) (*citing*
OMLO 2001-22 (April 27, 2001) and discussing the importance of the public's right to

1 address public bodies). Indeed, freedom of expression upon public questions is secured by
2 the First Amendment. *N.Y. Times Co. v. Sullivan*, 376 U.S. 254, 269 (1964). Generally,
3 “the right to criticize public officials” is protected by the First Amendment. *Jenkins v. Rock*
4 *Hill Local Sch. Dist.*, 513 F.3d 580, 588 (6th Cir. 2008). Article 1, Section 9 of the Nevada
5 Constitution also expressly protects a citizen’s freedom of speech.⁵ The OAG previously
6 stated that the constitutional safeguards were “fashioned to assure unfettered interchange
7 of ideas for bringing about political and social changes desired by the people.” *In re: Incline*
8 *Village General Improvement District*, *supra*.

9 Despite these constitutional safeguards, an individual’s right to speak is not
10 unfettered. Rather, the OML allows public bodies to place restrictions on comments made
11 by the general public, but any such restriction must be reasonable and may only restrict
12 the time, place, and manner of the comments. NRS 241.020(3)(d)(7). Restrictions based
13 upon an individual’s viewpoint are strictly prohibited. *Id.* Courts have found that
14 restrictions on public comment must not be applied unreasonably or arbitrarily. *Chaffee v.*
15 *San Francisco Public Library Com.*, 134 Cal. App. 4th 109, 115, 36 Cal. Rptr. 3d 1, 5 (Cal
16 Ct. of App. 1st Dist., Div. 4 October 26, 2005). Should a public body wish to place
17 restrictions on public comment, the OML further instructs that the agenda of the public
18 body clearly express all restrictions on public comment. NRS 241.020(3)(d)(7).

19 **2. Interruptions and termination of public comment by the Council**
20 **may lead to violations of the OML.**

21 Mr. Rolle asserts that he was interrupted while making public comment during the
22 November 18, 2020 meeting while making critical comments of a particular councilmember.
23 In response to this allegation, the Council asserts, through its attorney, that the Council did
24

25 ⁵ Sec. 9: **Liberty of speech and the press.** Every citizen may freely speak, write and
26 publish his sentiments on all subjects being responsible for the abuse of that right; and no
27 law shall be passed to restrain or abridge the liberty of speech or of the press. In all criminal
28 prosecutions and civil actions for libels, the truth may be given in evidence to the Jury; and
if it shall appear to the Jury that the matter charged as libelous is true and was published
with good motives and for justifiable ends, the party shall be acquitted or exonerated.

1 not “demand” or “require” positive comments; rather, the Council “welcomed” positive or
2 uplifting comments and that such action or statements were not meant to be used as
3 viewpoint restrictions.

4 The video of the November 18, 2020 meeting shows Mr. Rolle providing public comment
5 to the Council criticizing Mayor Pro Tem Anthony as being “incompetent” and “unable to
6 handle something as simple as a parking ticket” but was stopped mid-sentence. Specifically,
7 the Mayor requested that Mr. Rolle be polite, not “put people down unless you’re perfect”, and
8 “have no put-downs”. Mayor Goodman then offered to give back one minute of time to Mr.
9 Rolle. Mr. Rolle then continued with his comment, including a proposal to open up a “big box
10 retail store that caters exclusively to baby boomers who only advocate for conspiracy theories
11 on Facebook and we can call it MAGA Mart.” At this point, Mr. Rolle’s microphone was cut
12 off.

13 It appears that Mr. Rolle’s comments were aimed at criticizing Mayor Pro Tem
14 Anthony. Mr. Rolle was prohibited from providing comments criticizing particular
15 councilmembers, while at previous public comment periods afforded by the Council,
16 individuals providing positive comments of councilmembers were allowed to state their
17 comments in full. Although the Council may not have intended to restrict Mr. Rolle’s
18 comments based on viewpoint, Mr. Rolle was prevented from fully providing his comments
19 and making his public record. As such, the OAG finds the Council violated the OML by
20 restricting Mr. Rolle from providing critical comments against certain councilmembers
21 while allowing other members of the public to provide positive comments.

22 Second, the Complaint also asserts that the Council violated the OML during the same
23 public comment period, when another member of the public addressed the Council regarding
24 an agenda item related to a west side development project and that Councilman Crear failed
25 to reach out to the speaker. In reviewing the video of the meeting, it appears that Mayor
26 Goodman interrupted the speaker and proposed that what the speaker had stated may not
27 have been completely factual. The speaker stated that she challenged the truth of Mayor
28 Goodman’s statements and would discuss it with Councilman Crear.

1 In this instance, the OAG does not find a violation of the OML, but cautions the Council
2 that interruptions of public speakers during public comment may lead to violations of the
3 OML if the Council prohibits the speaker from providing comments within the restrictions
4 placed upon speakers by the Council. Although the Council interrupted the speaker's
5 comment, Mayor Goodman indicated that she would give back the minute of time used up
6 from the exchange regarding whether what the speaker was telling was true, and the Council
7 allowed the speaker to proceed with her full comment. As previously delineated, while a
8 public body may disagree with the factual basis of the comment, should a matter be within
9 the authority of the public body, the issue could have received discussion or rebuttal from
10 staff. See *In re Incline Village General Improvement District*, *supra*.

11 **3. The Council did not violate the OML by placing limitations on the**
12 **amount of time a speaker could address the Council.**

13 The OAG previously stated that enforcement of viewpoint-neutral time limitations is
14 highly discretionary and is generally left to the presiding officer. *In re: Incline Village General*
15 *Improvement District*, OAG File Nos. 13897-224 & 226 (October 19, 2017); *see also White v.*
16 *City of Norwalk*, 900 F.2d 1421 (9th Cir. 1990) (“The role of the moderator of a public meeting,
17 when enforcing rules like the public comment time limit, is highly discretionary.”).

18 In the case at bar, the Council provided notice of the restrictions on public comment it
19 could invoke during its meetings. With regard to the first session of public comments at both
20 the Council's November 4 and November 18 meetings, the agendas stated: (1) that public
21 comments be limited to matters on the Agenda for action; (2) a speaker must go to the podium
22 and state his/her name for the record; and (3) the amount of discussion and time of any single
23 speaker is allowed, *may* be limited. (emphasis added). On its face, the Agenda cautions that
24 an individual's time to address the Council may be limited. Further, at the meetings and
25 prior to accepting any public comment, the Council apprised any individuals wishing to make
26 public comment of the specific time limitations. There was no appearance that the Council
27 selectively enforced the time limitations, as the same time limitation warnings were provided
28 to all speakers prior to the Council accepting public comments. However, while the OAG finds

1 no violation of the OML as alleged, the OAG suggests that, should the Council wish to place
2 any time limitations on individual speakers wishing to make public comment, that a specific
3 amount of time be placed on the agenda so that individuals wishing to make public comment
4 are aware of the possible time limitations on their comment and may plan their comment
5 accordingly.

6 Additionally, the Complaint asserts that during the November 18, 2020 meeting, the
7 Council allowed certain individuals to speak in excess of the time limit delineated by the
8 Council during public comment while interrupting and cutting off other speakers who
9 exceeded the time restrictions. The OAG finds insufficient evidence to substantiate this
10 allegation. Rather, in reviewing the video, the Council imposed a one-minute-per-speaker
11 time limitation on public comment and that the speaker who allegedly spoke in excess of the
12 Council's one-minute time limit was "donated" two total minutes, one minute from two other
13 members of the public, so that the speaker could have up to three minutes in which to make
14 her comment. Accordingly, the OAG finds that the Complaint's allegations that the Council
15 allowed specific speakers to make comment in excess of the Council-imposed time limitation
16 is unsubstantiated.

17 While the OAG is cognizant that the OML is silent on a prohibition regarding whether
18 speakers may donate their time to speak to other individuals so as to create a larger pool of
19 time for one individual to speak, the OAG is of the opinion that each individual public body
20 has the discretion whether to allow such practices under its authority to impose time, place,
21 and manner restrictions on public comment. However, to the extent a public body allows for
22 donations of time to other individuals wishing to make extended public comments, the public
23 body may not impose restrictions on the allocation of donated time that are based on the
24 speaker's viewpoint.

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1 **4. The Council did not violate the OML when it sought to confirm**
2 **whether Mr. Rolle’s comments were related to a particular**
3 **agenda item.**

4 When public comment is allowed during the consideration of a specific topic, the
5 chairperson may require public comment to be relevant to the topic, provided the restriction
6 is viewpoint neutral. *See Attorney General Nevada Open Meeting Law Manual, Section 7.05*
7 Reasonable time, place, and manner restrictions apply to public meetings, Twelfth Ed.,
8 January 2016 (updated March 26, 2019). Courts have also ruled that public bodies may be
9 justified in limiting its meeting to discussion of specified agenda items and in imposing
10 reasonable restrictions to preserve the civility and decorum necessary to further the forum’s
11 purpose of conducting public business. *Steinburg v. Chesterfield Cnty. Planning Com’n*, 527
12 F.3d 377, 385 (4th Cir. 2008).

13 The instant Complaint alleges that during discussion of Agenda Item No. 63 of the
14 Council’s November 18, 2020 meeting, Councilwoman Michele Fiore interrupted Mr. Rolle,
15 and Mr. Rolle believes that Councilwoman Fiore implied he was not speaking to the
16 particular agenda item. This particular agenda item related to a public hearing by
17 Applicant/Owner George Tony Lopez, et al., for particular Land Use Entitlement project
18 requests on specific real property. A presentation was made by Ricky Barlow, who
19 represented the applicant, George Tony Lopez. After Mr. Barlow made his presentation,
20 the Council sought public comment on the agenda item. After the City Clerk read the
21 public comments received electronically, the Mayor acknowledged that an individual was
22 headed to the podium appearing to want to make public comment. The OAG notes that the
23 speaker did not at that time state his name for the record and instead questioned whether
24 Mr. Barlow was “the same Ricky Barlow who had been alleged to have had engaged in
25 kickbacks”.

26 The video further shows that voices in the background continued to ask this
27 individual for his name, while another voice asked the speaker whether his comments were
28 related to Agenda Item No. 63. In response, the speaker stated his reasons for why he
 believed his comments were relevant. The Mayor then again asked the speaker for his

1 name and requested the speaker remove his mask for the record. It was only at this time
2 that the speaker was identified as Mr. Rolle. The OAG does not find that an OML violation
3 has occurred with regards to this exchange. Mr. Rolle was able to provide his comment
4 that he felt there was a potential conflict of interest for Mr. Barlow to recommend approval
5 for Agenda Item No. 63. To the extent that the Council appeared to have interrupted Mr.
6 Rolle's comment, the Council's questions appear to be directed at ascertaining Mr. Rolle's
7 identity and determining whether Mr. Rolle's comment regarding Mr. Barlow's identity
8 was in fact related to the land use entitlement projects before the Council. As such, the
9 OAG finds no OML violation.

10 **5. The Open Meeting Law was not violated where the Council**
11 **requested members of the public to remove their facial**
12 **coverings/masks to make a comment.**

13 On March 12, 2020, Nevada Governor Steve Sisolak issued a Declaration of Emergency
14 in response to the COVID-19 pandemic. On June 24, 2020, Governor Sisolak issued
15 Declaration of Emergency Directive 024 that required individuals to wear face coverings
16 while in a public space. Declaration of Emergency Directive 024, Section 5 (June 24, 2020).
17 However, neither the Directive nor the OML prohibit a public body from requesting an
18 individual to remove his/her facial covering prior to making public comment so that the
19 individual's identity may be recorded for the record.

20 In reviewing the video recordings for the November 4 and November 18 Council
21 meetings, after an individual came to the podium, the Council requested speakers to lower
22 their face coverings and state their names for the record. After the speakers made their
23 appearances for the record, the speakers had the option of either wearing their masks over
24 their noses and mouths or keeping the facial coverings removed for the duration of their
25 comments. While the recordings do not reflect any individual making public comment
26 refusing to lower their facial coverings, the Council, through its attorney, noted that "such a
27 request is not a prerequisite to participating and has never been used to prevent a member of
28 the public from speaking." Therefore, the OAG finds there is insufficient evidence to
substantiate this claim.

1 **6. The Council did not violate the OML when councilmembers**
2 **provided comments in response to an individual's public**
3 **comment.**

4 The Complaint also alleges that the Council has a restriction prohibiting
5 councilmembers from commenting during public comment sections of the agenda and that
6 the Council violated this restriction when certain councilmembers commented on various
7 comments made by members of the public. The Council, through its attorney, positions
8 that its agendas do not contain such a prohibition on councilmembers to respond to public
9 comments and that it has never told the public that it is legally prohibited from discussing
10 public comments. The OML does not prohibit members of public bodies from discussing
11 public comment; however, no deliberation or action may be taken on matters introduced in
12 public comment. NRS 241.020(d)(3); OMLO AG File No. 13897-325. Accordingly, the OAG
13 finds no violation of the OML has occurred.

14 **7. There is insufficient evidence that the Council uses intimidation**
15 **and retaliation tactics on members of the public to chill public**
16 **comment.**

17 The instant Complaint further asserts that the Council uses intimidation tactics on
18 members of the public that, in effect, chill public comment. Specifically, the Complaint asserts
19 that the Council uses City Marshals to intimidate members of the public during public
20 comment sections of the meetings and that Mr. Rolle's vehicle was urinated on while parked
21 in the City of Las Vegas parking lot, as a sign of retaliation. After reviewing the evidence
22 provided, the OAG determines that there is insufficient evidence that the Council engaged in
23 intimidation or retaliation tactics that led to the public's inability to provide public comment.
24 Rather, each individual who wished to make public comment at the Council's meetings,
25 including Mr. Rolle, was able to do so. Accordingly, the OAG determines that no formal
26 violation of the OML has occurred.

27 **8. The OAG will abstain from providing an opinion regarding the**
28 **alleged incident from the Council's July 22, 2020 meeting.**

 The Complaint also alleges that the Council violated the Open Meeting Law during its
 July 22, 2020 meeting where an attendee was pulled from the meeting and cited with a

1 misdemeanor for interrupting the Council. The OAG will refrain from providing an opinion
2 on this allegation, as the Complaint was filed over 120 days after the alleged violation. See
3 NRS 241.036(2).

4 SUMMARY

5 Upon investigating the present Complaint, the OAG makes findings of fact and
6 conclusions of law that the Las Vegas City Council violated the OML by placing content-
7 based restrictions on public comment, as set forth above.

8 If the Attorney General investigates a potential OML violation and makes findings
9 of fact and conclusions of law that a public body has taken action in violation of the OML,
10 “the public body must include an item on the next agenda posted for a meeting of the public
11 body which acknowledges the findings of fact and conclusions of law.” NRS 241.0395. The
12 public body must treat the opinion of the Attorney General as supporting material for the
13 agenda item(s) in question for the purpose of NRS 241.020. *Id.* Accordingly, the Council
14 must place an item on its next meeting agenda in which it acknowledges the present
15 Findings of Fact and Conclusions of Law (“Opinion”) resulting from the OAG’s investigation
16 in this matter. The Council must also include the OAG Opinion in the supporting materials
17 for its next meeting.

18 Lastly, NRS 241.037 confers upon the OAG the power to bring suit “in any court of
19 competent jurisdiction to have an action taken by a public body declared void or for an
20 injunction against any public body or person to require compliance with or prevent violation
21 of [NRS 241].” Upon investigation of this file, no action was taken by the Council specific
22 to the violations enumerated in this Opinion. Therefore, the OAG will abstain from
23 bringing suit at this time.

24 Dated: April 14, 2021.

25 AARON FORD
26 Attorney General

27 By: /s/ Justin R. Taruc
28 Justin R. Taruc
Deputy Attorney General

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of April, 2021, I served the foregoing **FINDINGS OF FACT AND CONCLUSIONS OF LAW** by depositing a copy of the same in the United States mail, properly addressed, postage prepaid, **CERTIFIED MAIL** addressed as follows:

Jeffry M. Dorocak, Deputy City Attorney
City of Las Vegas Office of the City Attorney
495 Main Street, Sixth Floor
Las Vegas, Nevada 89101

Certified Mail No.: 7020 0640 0000 7652 0001

Daniel Rolle
[Redacted]
[Redacted]

Certified Mail No.: [Redacted]

/s/ Debra Turman
An employee of the Office of the
Nevada Attorney General