



CLERK OF THE COURT

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DISTRICT COURT

CLARK COUNTY, NEVADA

10 NEVADA POLICY RESEARCH
11 INSTITUTE, INC.,

Case No.: A-13-679114-C

Dept. No. : VIII

Docket No.:

Plaintiff,
vs.
**CLARK COUNTY SCHOOL DISTRICT, a
political subdivision of the State of Nevada;
THE NEVADA PUBLIC EDUCATION
FOUNDATION; and THE PUBLIC
EDUCATION FOUNDATION,**

**OPPOSITION TO DEFENDANT CLARK
COUNTY SCHOOL DISTRICT'S
MOTION TO DISMISS**

Date of Hearing: July 2, 2013

Time of Hearing: 8:00 a.m.

COMES NOW, Plaintiff, NEVADA POLICY RESEARCH INSTITUTE, INC.,

(hereinafter, "NPRI"), by and through its attorney of record, NPRI Center for Justice and Constitutional Litigation, and hereby opposes Defendant CLARK COUNTY SCHOOL DISTRICT'S (hereinafter, "CCSD") Motion to Dismiss.

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MEMORANDUM OF POINTS AND AUTHORITIES

L. STATEMENT OF FACTS

On or about June 11, 2012, Victor Joecks, Communications Director at NPRI requested from CCSD, a directory of government-provided e-mail addresses of all CCSD teachers pursuant to NRS 239, the Nevada Public Records Act (hereinafter, “the NPRA”). On July 3, 2012, Carlos L. McDade, General Counsel for CCSD replied to Mr. Joecks of NPRI with a letter claiming that the NPRA does not require disclosure of the directory of CCSD’s government-issued e-mail addresses because:

- (1) It is part of an employee's personnel records and must be safeguarded by CCSD;
 - (2) It is not a public record under the NPRA because it is similar to a book or pamphlet;
 - (3) Entities (now co-Defendants) which purchased the e-mail software used by CCSD somehow prevent disclosure; and
 - (4) A court would not require disclosure under the *Donrey* balancing test (*citing Donrey of Nevada, Inc. v. Bradshaw*, 106 Nev. 630 (1990) and *Reno Newspapers, Inc. v. Haley*, 234 P.3d 922 (2010)).

On February 25, 2013, NPRI sent by Certified Mail, Return Receipt Requested, a “final” request letter to CCSD (and co-Defendants implicated by CCSD as somehow integral to the release of the requested directory) for the e-mail directory in question.

On March 5, 2013, CCSD responded to NPRI's "final" request with another letter refusing to disclose the e-mail directory because:

- (1) It is part of an employee's personnel records and must be safeguarded by the district;
 - (2) It falls within the definition of a non-record; and
 - (3) A court would not require disclosure under the *Donrey* balancing test (*citing Donrey of Nevada, Inc. v. Bradshaw*, 106 Nev. 630 (1990) and *Reno Newspapers, Inc. v. Haley*, 234 P.3d 922 (2010)).

Missing from CCSD's March 5, 2013 refusal letter was its earlier contention that the e-mail directory could not be made available because entities (now co-Defendants) which purchased the e-mail software program used by CCSD somehow prevented disclosure.

1 Thus, on March 28, 2013, pursuant to NRS 239.011, NPRI filed its Complaint against
2 CCSD and those co-Defendants implicated by CCSD seeking judicial relief to secure from
3 CCSD (or the co-Defendants) the public records sought. On April 9, 2013, Plaintiff NPRI served
4 CCSD with the Summons and Complaint.

5 In response to NPRI's Complaint, on May 24, 2013, Defendant CCSD filed a Motion to
6 Dismiss NPRI's Complaint citing three legal bases to justify dismissal:

- 7 (1) That NRS 239B, a Nevada statute governing "Disclosure of Personal Information to
8 *Governmental Agencies*" (*emphasis added*) somehow precludes CCSD from releasing
9 government-generated, government-issued e-mail addresses to the public under the
10 NPRA;
- 11 (2) That NRS 603, a Nevada "unfair trade practices" statute seeking to protect
12 proprietary computer programming code from being misappropriated, somehow
13 prevents disclosure of CCSD's directory of e-mail addresses; and
- 14 (3) That CCSD's interest in non-disclosure outweighs the public's interest in transparent
15 government and/or the public interest in communicating with government employees.

16 It should be noted by this Court that this current installment of CCSD's complained-of
17 failure to comply with the Nevada Public Records Act is in no way an isolated occurrence by
18 CCSD in which CCSD finds some extraordinary fact, basis, or circumstance warranting non-
19 disclosure under the Act. Rather, CCSD has an expansive and protracted record of delaying and
20 obfuscating many public record requests made by NPRI¹ (and others),² this merely being the first
21 to which NPRI has mounted a judicial challenge.

22 **II. INTRODUCTION**

23 The Nevada Public Records Act ("NPRA") provides that *all* public books and public
24 records of governmental entities must remain open to the public, unless "otherwise declared by
25

26 ¹ See Affidavit of Karen Gray detailing a partial but recent history of prolonged- and non-
27 compliance by Clark County School District with numerous requests for records. Exhibit 1.

28 ² E.g. Paul Takahashi, *District Refuses Request to Release "Turnaround Schools'" Graduation*
Data, Las Vegas Sun, December 29, 2012. Exhibit 2.

1 law to be confidential." NRS 239.010(1). The Legislature has declared that the purpose of the
2 NPRA is to further the democratic ideal of an accountable government by ensuring that public
3 records are broadly accessible. NRS 239.001(1). Thus, the provisions of the NPRA are designed
4 to promote government transparency and accountability.

5 In 2007, in order to better effectuate these purposes, the Legislature amended the NPRA
6 to provide that its provisions must be liberally construed to maximize the public's right of access.
7 NRS 239.001(1)-(2); 2007 Nev. Stat., ch. 435, § 2, at 2061. Conversely, any limitations or
8 restrictions on the public's right of access must be narrowly construed. NRS 239.001(3); 2007
9 Nev. Stat., ch. 435, § 2, at 2061. In addition, the Legislature amended the NPRA to provide that
10 if a state entity withholds records, it bears the burden of proving, by a preponderance of the
11 evidence, that the records are confidential. NRS 239.0113; 2007 Nev. Stat., ch. 435, § 5, at 2062.

12 The Legislature hereby finds and declares that:

13 1. The purpose of this chapter is to foster democratic principles by providing
14 members of the public with access to inspect and copy public books and
15 records to the extent permitted by law;

16 2. The provisions of this chapter *must be construed liberally* to carry out this
17 important purpose;

18 3. *Any exemption, exception or balancing of interests which limits or restricts*
19 *access to public books and records by members of the public must be*
construed narrowly; and

20 4. The use of private entities in the provision of public services must not
21 deprive members of the public access to inspect and copy books and records
22 relating to the provision of those services.

23 NRS 239.001(*emphasis added*)(The Nevada Public Records Act).

24 The Nevada Supreme Court has "therefore established a framework for testing claims of
25 confidentiality under the backdrop of the NPRA's declaration that its provisions 'must be
26 construed liberally' to facilitate access to public records, NRS 239.001(2), and that any
27 restrictions on access 'must be construed narrowly.' NRS 239.001(3)." *Reno Newspapers, Inc.*
28 *v. Gibbons*, 266 P.3d 623, 628 (2011).

1 First, according to the court in *Reno Newspapers*, this Court “must begin with the
2 presumption that all government-generated records are open to disclosure. See *Reno Newspapers*
3 v. *Sheriff*, 126 Nev. at ——, 234 P.3d at 924; *DR Partners*, 116 Nev. at 621, 6 P.3d at 468.” *Id.*
4 “The state entity therefore bears the burden of overcoming this presumption by proving, by a
5 preponderance of the evidence, that the requested records are confidential. NRS 239.0113; *DR*
6 *Partners*, 116 Nev. at 621, 6 P.3d at 468.” *Id.*

7 Next, “in the absence of a statutory provision that explicitly declares a record to be
8 confidential, any limitations on disclosure must be based upon a broad balancing of the interests
9 involved, *DR Partners*, 116 Nev. at 622, 6 P.3d at 468; *Bradshaw*, 106 Nev. at 635, 798 P.2d at
10 147, and the state entity bears the burden to prove that its interest in nondisclosure clearly
11 outweighs the public's interest in access. *Reno Newspapers v. Sheriff*, 126 Nev. at ——, 234 P.3d
12 at 927.” *Id.*

13 Finally, “caselaw stresses that the state entity cannot meet this burden with a non-
14 particularized showing, *DR Partners*, 116 Nev. at 627–28, 6 P.3d at 472–73, or by expressing
15 hypothetical concerns. *Reno Newspapers v. Sheriff*, 126 Nev. at ——, 234 P.3d at 927.” *Id.*

16 Against this framework of mandated transparency in government, CCSD’s Motion to
17 Dismiss must be denied.

18 First, their claimed statutory exceptions rely upon two statutes almost completely
19 unrelated to the legal issue at bar.

20 CCSD, in its Motion to Dismiss, relies most heavily upon NRS 239B, a Nevada Statute
21 of which even a cursory reading reveals is inapplicable to the case at hand. Although passages
22 craftily (or deceptively) excerpted by Defendant CCSD suggest some relevance to the issue, read
23 in context, it is abundantly clear that this statute was enacted to protect those who interact and
24 provide private information to government from having certain information they disclosed, in
25 turn, made public by government. It certainly does not apply to records and information
26 generated by the government itself.

27 CCSD attempts to rely next upon NRS 603.070, a trade regulation statute enacted to
28 protect computer software programming code from being misappropriated — this, of course, is

1 not relevant to NPRI's public records request of a non-proprietary e-mail directory generated by
2 Defendant CCSD, itself.

3 Second, CCSD's attempt to withhold public records under the balancing test must fail
4 because against a statutorily-imposed, strong presumption of open records its claimed
5 justifications are, at best, "hypothetical" and, moreover, history and experience of such records
6 having been generally available over time demonstrate no rational basis for asserting even those
7 justifications.

8 **III. LEGAL ARGUMENT**

9 **A. NRS 239B Protects Only the Privacy of Certain Private Persons Who Interact
10 With or Provide Information to Governments and is Inapplicable as to
11 Justifying CCSD's Non-Compliance With the NPRA.**

12 CCSD, in its Motion to Dismiss, relies most heavily upon NRS 239B, a Nevada Statute
13 of which even a cursory reading reveals the statute's inapplicability to the case at hand.
14 Although passages excerpted by Defendant CCSD suggest some relevance to the issue, read in
15 context, it is abundantly clear that statute was enacted to protect those who interact and provide
16 private information to a governmental entity from, in turn, having certain information they
17 disclosed made public by government. It does not apply to information, records, data, or e-mail
18 addresses generated by the government itself. For ease of the Court, the relevant portion of NRS
19 239B is replicated here:

20 **CHAPTER 239B - DISCLOSURE OF PERSONAL
21 INFORMATION TO GOVERNMENTAL AGENCIES**

22 NRS 239B.040 Databases containing electronic mail addresses or
23 telephone numbers of *certain persons*; use of information; confidentiality.

24 1. Except as otherwise provided in this section or by specific statute:

25 (a) If a *person* or his or her agent provides the electronic mail
26 address or telephone number of the person *to a governmental entity for the
purpose of or in the course of communicating with that governmental
entity*, the governmental entity may maintain the electronic mail address or
telephone number in a *database*.

27 (b) A database described in this subsection:

28 (1) Is confidential;

- (2) Is not a public book or record within the meaning of NRS 239.010; and
 - (3) Must not be disclosed in its entirety as a single unit.

2. The individual electronic mail address or telephone number of a person is not confidential and may be disclosed individually in accordance with applicable law if the person or his or her agent provides the electronic mail address or telephone number to a governmental entity:

 - (a) In the course of an existing business or contractual relationship with the governmental entity; or
 - (b) In the course of seeking to establish a business or contractual relationship with the governmental entity, including, without limitation, in response to a request for proposals or invitation to bid from the governmental entity.

NRS 239B.040 (*emphasis added*).

Although at least one state, Florida, has statutorily made e-mail addresses submitted to government public but requires notice of that fact to submitters,³ most states have a provision similar to that in Nevada protecting the private e-mail addresses of those who either through interaction with government or at the request of government, have submitted their e-mail addresses.⁴

³ See e.g. Exhibit 3.

⁴ See e.g. TEXAS Sec. 552.137. CONFIDENTIALITY OF CERTAIN E-MAIL ADDRESSES.

(a) Except as otherwise provided by this section, an e-mail address of a member of the public that is provided for the purpose of communicating electronically with a governmental body is confidential and not subject to disclosure under this chapter.

(b) Confidential information described by this section that relates to a member of the public may be disclosed if the member of the public affirmatively consents to its release.

(c) Subsection (a) does not apply to an e-mail address;

(1) provided to a governmental body by a person who has a contractual relationship with the governmental body or by the contractor's agent;

(2) provided to a governmental body by a vendor who seeks to contract with the governmental body or by the vendor's agent;

(3) contained in a response to a request for bids or proposals, contained in a response to similar invitations soliciting offers or information relating to a potential contract, or provided to a governmental body in the course of negotiating the terms of a contract or potential contract;

(4) provided to a governmental body on a letterhead, coversheet, printed document, or other document made available to the public; or

Despite extensive research on this point of law, Plaintiff has found no legal authority that any such statute has ever been used to justify non-disclosure of government-generated and/or government-issued e-mail addresses to members of the public.

In fact, if such were the case, twelve school districts in Nevada which *have* complied with NPRI's public records act requests for teacher e-mail address directories or lists, would be (and would have historically been) in direct and repeated violations of NRS 239B.040 as construed by Defendant CCSD.⁵ Plaintiff cannot believe this to be the case; nor should this Court

Even more damaging to Defendant CCSD's argument misconstruing the statute to avoid compliance with the NPRA is the fact that CCSD itself would be in direct violation of NRS 239B (as it construes it) because a number of schools even within Clark County School District make these e-mail addresses public on CCSD school websites.⁶

B. NRS 603 is an “Unfair Trade Practices” Statute Which Protects Proprietary Software and Programming Code From Being Misappropriated and is Inapplicable to Justify CCSD’s Non-Compliance With the NPRA.

In footnote 3 of its Motion to Dismiss, p.6, Defendant CCSD cites NRS 603.070, another Nevada statute by which it hopes to evade compliance with the NPRA. Like NRS 239B, applying this statute to the case at bar would require another tortured interpretation of what is, in actuality, a trade regulation statute, the purpose of which is to prevent misappropriation of proprietary software programming code and accompanying proprietary data which make computer programs and applications function. It is not applicable to public records generated with that software or their applications.

(5) provided to a governmental body for the purpose of providing public comment on or receiving notices related to an application for a license as defined by Section 2001.003(2) of this code, or receiving orders or decisions from a governmental body.

(d) Subsection (a) does not prevent a governmental body from disclosing an e-mail address for any reason to another governmental body or to a federal agency.

⁵ See Exhibit 4. Affidavit of Victor Jaecks, NPRI Communications Director.

⁶ See Exhibit 5. (A quick internet search reveals that at least several schools within Clark County School District post a complete directory of teacher e-mail addresses on their websites).

1 However ill-founded, it is, of course, this statutory argument which implicates the co-
2 Defendants (Nevada Public Education Foundation and Public Education Foundation) in this case
3 and makes them necessary parties given the ownership history of the proprietary software
4 program referenced by the parties as InterAct™.

5 As was the case with NRS 239B detailed above, read in context, it is again abundantly
6 clear that the statute relates to something different from what is at issue in this case. Again, for
7 ease of the Court, the portion of NRS 603 referenced by CCSD is replicated here:

8 **Use by governmental agency of proprietary program or data.** Except as
9 otherwise provided in NRS 239.0115, a governmental agency which obtains a
10 proprietary program or the data stored in a computer must keep the program or
11 data confidential. The governmental agency may only use the program or data for
12 the purpose for which it was obtained, and may not release the program or data
13 without the prior written consent of the owner.

NRS 603.070.

Reviewing other portions of that statute and its purposes are helpful in demonstrating that
the public records created with proprietary software and the programming code/data that make
the software work are quite different.

By way of explanation, accepting Defendant CCSD's tortured interpretation of NRS 603
to exclude the public records created with various proprietary software programs would gut the
NPRA completely. For example, all government documents or correspondence created with
Microsoft Word™ would, under CCSD's interpretation of the statute become non-disclosable
because the documents were created, stored, and/or manipulated using proprietary software from
Microsoft, Inc. All e-mails sent or received through Microsoft Outlook™ would be non-
disclosable, as well,. The same would be true of MS Excel™ spreadsheets and documents.

Plaintiff NPRI is not attempting to "pirate" the programming code for InterAct, Microsoft
Word, Microsoft Outlook, or Microsoft Excel or any other proprietary software that may be used
by CCSD. NPRI is merely requesting some of the public records held by Defendant CCSD
which may or may not have been created by CCSD using proprietary software.

1 Additionally, by CCSD’s interpretation of the statute (as with CCSD’s interpretation of
2 NRS 239B), its own schools are violating the statute insofar as at least several of Clark County
3 School District’s schools are publishing on their websites the very “data” Defendant CCSD
4 claims is a misappropriation and violation of law under NRS 603.070. Exhibit 5.

5 Lastly, even if this Defendant’s statutory argument relating to NRS 603 were in any way
6 tenable, by the language of the statute itself, it would not apply to Defendant CCSD because the
7 District itself claims to have assumed control of InterAct™ more than a decade ago. See
8 Complaint Exhibit 8 and Defendant Public Education Foundation’s Motion to Dismiss Exhibit
9 A. NRS 603.070, even as interpreted by Defendant CCSD, would only require “the prior written
10 consent of the owner” before releasing “data” as CCSD would hope to classify its e-mail
11 directory and, by its own admission, CCSD is now seemingly that very owner.

12 **C. CCSD’s Interest in Non-disclosure Does Not Outweigh the Significant Public**
13 **Interest in Transparent Government and/or the Public’s Interest in**
14 **Communicating Therewith.**

15 As a preliminary matter, even if the “balancing test” facts were on its side, a Motion to
16 Dismiss is generally not the proper method for disposition of a case in which a fact-intensive
17 balancing test is to be employed. “In many cases, factual development is necessary, so the
18 balancing *cannot* be performed on a 12(b)(6) motion.” *Weisbuch v. County of Los Angeles*, 119
19 F.3d 778, 783 (9th Cir. 1997); *Hyland v. Wonder*, 972 F.2d 1129, 1140 (9th Cir. 1992)(*emphasis*
20 *added*). For this reason alone, Defendant CCSD’s Motion to Dismiss on balancing test grounds
must be denied.

21 As importantly, under NRS 239 and supporting caselaw, Defendant CCSD must legally
22 surmount a huge legal presumption in favor of open government records. This it fails to do.
23 Even in the case relied upon almost exclusively by Defendant CCSD to support its “balancing
24 test argument,” *Reno Newspapers, Inc. v. Gibbons*, 266 P.3d 623, (2011), the Nevada Supreme
25 Court held that the state’s former chief executive must provide to a requester under the NPRA, a
26 detailed log or index identifying sender, recipient(s), date, and subject matter of e-mail
27 communications.

1 In *Reno Newspapers v. Sheriff*, the Nevada high court again favored disclosure over non-
2 disclosure, requiring only that certain confidential information be redacted, if present.

3 As stated earlier, “in the absence of a statutory provision that explicitly declares a record
4 to be confidential, any limitations on disclosure must be based upon a broad balancing of the
5 interests involved, *DR Partners*, 116 Nev. at 622, 6 P.3d at 468; *Bradshaw*, 106 Nev. at 635, 798
6 P.2d at 147, and the state entity bears the burden to prove that its interest in nondisclosure clearly
7 outweighs the public's interest in access. *Reno Newspapers v. Sheriff*, 126 Nev. at ——, 234 P.3d
8 at 927.” *Reno Newspapers, Inc. v. Gibbons*, 266 P.3d 623, 628 (2011).

9 Finally, “caselaw stresses that the state entity cannot meet this burden with a non-
10 particularized showing, *DR Partners*, 116 Nev. at 627–28, 6 P.3d at 472–73, or by expressing
11 hypothetical concerns. *Reno Newspapers v. Sheriff*, 126 Nev. at ——, 234 P.3d at 927.” *Id.*

12 “Hypothetical concerns” are, nevertheless, exactly what Defendant CCSD attempts to
13 invoke to justify dismissal here. CCSD Motion to Dismiss pp. 6-8. Defendant CCSD’s sole
14 claimed interests in the balancing test can be reduced to two concerns relating to school district
15 efficiency: (1) excessive e-mails will clog CCSD’s servers and computer systems; and (2)
16 teachers will be subject to phishing scams, computer viruses, and unsolicited e-mail. These will
17 be addressed in turn but, arguably, any governmental entity could be more “efficient” if it were
18 not required to respond either to public records act requests or concerns of the public as
19 addressed via electronic communication. The Legislature, however, has prescribed that open
20 government and open records supersede this “efficiency” argument.

21 Ironically, in the paragraph immediately following CCSD’s claims that servers will be
22 clogged, teachers will be subject to phishing and viruses, and teachers will be subject to
23 unsolicited advertisement, CCSD admits that “the refusal to provide an entire e-mail address
24 [directory] does not . . . prevent plaintiff, internet spammers, or anyone else from disseminating
25 their rhetoric and advertisements.” That being the case, by CCSD’s own admission, there is no
26 marginal harm to complying with the NPRA and releasing the e-mail directory, as requested.
27 There are, however, clear reasons why and factual evidence demonstrating that CCSD’s
28 justifications for non-disclosure are completely without merit.

1 **(1) CCSD's Server Will Not Be Clogged.**

2 CCSD itself sends e-mails to its entire directory regularly without any difficulty. An e-mail communication or two annually from NPRI will not clog CCSD's servers. In its letter of
3 March 5, 2013, General Counsel for CCSD admitted that Plaintiff NPRI has "demonstrated an
4 ability to e-mail thousands of our teachers through InterAct," all with no mention at that time of
5 NPRI ever having clogged CCSD's servers.

6 Moreover, the Nevada Education Coalition proudly makes available 8,393 Clark County
7 School District e-mail addresses on its website which could be e-mailed by any person or entity
8 at any time and this somehow has not "clogged the CCSD servers." Exhibit 6.

9 Even teachers themselves apparently use the e-mail directory to send pro-union, political
10 e-mail messages to large numbers of teachers, seemingly without any difficulty. See Exhibit 7.
11 If such e-mail "blasts" were a clogging concern, certainly CCSD would restrain its own
12 employees from sending mass e-mails for unofficial, pro-union, pro-political, and non-official-
13 business purposes. *Id.*

14 Additionally, CCSD is not suggesting that a list of teacher's *names* would not be subject
15 to disclosure under the NPRA. While claiming efficiency concerns, the alternative would be for
16 Plaintiff to e-mail Defendant CCSD some 17,000 public record requests, each one requesting an
17 individually-named teacher's e-mail address. Meanwhile, as mentioned earlier, certain schools
18 even within Clark County post this information on individual school websites (Exhibit 5) on an
19 ongoing basis and, yet, no clogging of servers has been reported.

20 Speaking further of efficiency and CCSD's purported interest to "ensuring the efficient
21 use of its taxpayer-funded resources," it's difficult to fathom that increasing server capacity to
22 accommodate increased communication with public school teachers could be more costly than
23 repeatedly hiring outside counsel to avoid compliance with the clear mandates of the NPRA, not
24 to mention costs awardable under the NPRA to opposing counsel.

25 ...

26 ...

27 ...

(2) Phishing, Computer Viruses and Spam Exist Irrespective of Whether CCSD Complies With Plaintiff's NPRA Request and Some Hypothetical Increase Therein Does Not Outweigh the Benefit of Transparent Government.

Gentleman, progress has never been a bargain. You've got to pay for it. Sometimes, I think there's a man behind a counter who says, "All right, you can have a telephone; but you'll have to give up privacy, the charm of distance. Madam, you may vote; but at a price; you lose the right to retreat behind a powder-puff or a petticoat. Mister, you may conquer the air; but the birds will lose their wonder, and the clouds will smell of gasoline!"⁷

Naturally, most e-mail accountholders are frustrated with unsolicited e-mails (“spam”), e-mails from Nigeria with promises of lost oil fortunes about to be made available, and e-mails attempting to fraudulently mimic those from legitimate vendors that seek personal or financial information from e-mail recipients (“phishing”). These conditions pre-exist Plaintiff’s request for records under the NPRA but, the fact that these conditions (like telemarketers) exist, does not warrant a wholesale abandonment of the legislatively ordained fundamental principle of transparent government. In fact, as discussed below, the Nevada Legislature has enacted other statutes to address unsolicited e-mail as well as e-mail fraud and deception.

Defendant CCSD would instead have this Court believe that releasing a list of e-mail addresses pursuant to the Nevada Public Records Act — e-mail addresses which attached Exhibits demonstrate are already, by and large, public⁸ — will significantly burden their employees with such unsolicited e-mails, phishing scams, and viruses such as to bring school district operations to a standstill and that this hypothetical result justifies abandoning the strong statutory language favoring openness in government and the release of public records.

While seemingly adept at citing statutes which do not apply to the case at bar, apparently lost on CCSD are the statutes that do exist to curtail exactly the type of activity CCSD hopes the hypothetical threat of which will justify non-disclosure of public records.

⁷ JEROME LAWRENCE AND ROBERT E. LEE, *INHERIT THE WIND* (1955).

⁸ See Exhibits 4, 5, 6, and 7.

With the enactment of NRS 41.725-.730, the matter of unsolicited electronic mail has been appropriately dealt with by the Nevada Legislature. With the enactment of NRS 205.492, the Nevada Legislature has dealt with the remaining hypothetical concerns of fraudulent or deceptive e-mail and viruses identified by Defendant CCSD so as to justify non-disclosure.

As such, Defendant CCSD may not claim activities already made otherwise illegal under state law as a justification for a stark departure from the legislatively ordained presumption in favor of open records.

Anti-virus and spam filters are other simple and common ways by which almost any entity of any size further combats the negative aspects of the efficiency-enhancing technology of electronic mail (e-mail). Because Defendant CCSD's e-mail addresses are already public to a large extent, releasing the directory to plaintiff should not further burden the school district with anti-virus and anti-spam software — software that any entity with more than 17,000 employees almost certainly already employs.

For all these reasons, Defendant CCSD fails, with its allegations of hypothetical concerns, to satisfy the balancing test, especially given the heavy presumption in favor of releasing public records under NRS 239, the Nevada Public Records Act.

IV. CONCLUSION

For all of the aforementioned reasons, Defendant CCSD's Motion must be denied and Defendant CCSD should be ordered to file an Answer to Plaintiff's Complaint or, in the alternative, fulfill Plaintiff NPRI's request for public records.

DATED this 11 day of June, 2013.

BY: /s/ Joseph F. Becker

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Attorney for Plaintiff

CERTIFICATE OF MAILING

I hereby certify that on the 11st day of June, 2013, I placed a copy of the foregoing
**OPPOSITION TO DEFENDANT CLARK COUNTY SCHOOL DISTRICT'S MOTION
TO DISMISS** in a sealed envelope in the United States Mail, postage prepaid, and addressed as follows:

Daniel F. Polsenberg
Joel D. Henriod
LEWIS AND ROCA, LLP
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An employee of:

NPRI CENTER FOR JUSTICE AND CONSTITUTIONAL LITIGATION

Attorney for Plaintiff

EXHIBIT 1

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8
9 DISTRICT COURT
CLARK COUNTY, NEVADA

10 NEVADA POLICY RESEARCH
11 INSTITUTE, INC.,

12 Plaintiff,

13 vs.

14 CLARK COUNTY SCHOOL DISTRICT, a
political subdivision of the State of Nevada;
15 THE NEVADA PUBLIC EDUCATION
FOUNDA^{TION}; and THE PUBLIC
EDUCATION FOUNDATION;

16 Defendants.

} Case No.: A-13-679114-C
Dept. No.: VIII
Docket No.:

AFFIDAVIT OF KAREN GRAY IN
SUPPORT OF PLAINTIFF'S OPPOSITION
TO DEFENDANT CLARK COUNTY
SCHOOL DISTRICT'S MOTION TO
DISMISS

Date of Hearing: July 2, 2013
Time of Hearing: 8:00 a.m.

19 COUNTY OF CLARK }
20 }

21 STATE OF NEVADA }
22 }

I, KAREN GRAY, being first duly sworn, depose and state as follows:

23 1. I, KAREN GRAY, am a resident and citizen of Clark County in the State of
24 Nevada.

25 2. I am an employee of the Nevada Policy Research Institute, Inc. ("NPRI") as a
26 Reporter with *Nevada Journal*, a news publication of NPRI.

27
28
AFFIDAVIT OF KAREN GRAY - 1

3. This Affidavit is made in support of PLAINTIFF'S OPPOSITION TO DEFENDANT CLARK COUNTY SCHOOL DISTRICT'S MOTION TO DISMISS. It is based upon my personal knowledge and I am competent to testify to the matters contained herein.

4. With an eye towards full transparency in government, NPRI seeks out and publishes information relating to government activities and, as such, I regularly send or oversee the sending of correspondence to governmental entities requesting information under the Nevada Public Records Act (hereinafter "the NPRA").

5. As a reporter, I utilize public records on nearly a daily basis and in any given week, could have one or more active public records requests. Because I am an education researcher and Reporter, the majority of my public records requests are submitted to the Clark County School District, where, more often than not, I endure weeks if not months of delays before receiving records.

Case I

6. One such example started on October 27, 2011. I sent a public records request to inspect CCSD police traffic citations issued between March 1 and October 27, 2011, as well as any audits of the department or its officers regarding traffic enforcement or citations between the dates of January 2007 and October 2011. After countless emails, phone calls, face-to-face conversations and meetings, CCSD finally produced the records in August 2012.

7. CCSD's initial response to the request included a cost estimate of \$766.00 for inspection due to "the labor intensive process to review and redact personal information associated with each citation" — \$546.00 was for staff overtime and \$220.00 was for copies, which totaled twice the district's copy rate. However, CCSD's response failed to provide

AFFIDAVIT OF KAREN GRAY - 2

1 citations to the legal authority(ies) for which the district claimed confidentiality. Nor did the
2 district address my request to inspect audits.
3

4 8. Over the next three months, I raised concerns over CCSD charging to review and
5 redact public records and made multiple inquiries regarding legal citations, fee clarifications and
6 access to the audits.

7 9. As part of the communications during those three months, CCSD offered to adjust
8 the fees, but repeatedly failed to provide a new estimate of costs or address the issue of review
9 and redaction fees. The district eventually provided legal citations for their bases of
10 confidentiality. However, these citations were ambiguous and I continued to seek clarification
11 which was not forthcoming. As such, in December 2011, I amended my October request to
12 extend the timeframe and include police tickets issued up to the week before CCSD's actual
13 production of the records, hoping that records eventually received would contain up-to-date
14 records. During this time (November 2011 to February 2012), CCSD also provided no direction
15 regarding the inspection of audits
16
17

18 10. In an effort to reduce the required amount of staff time and district resources, I
19 inquired, multiple times, as to the ability of CCSD to produce the records by electronic/digital
20 means. Instead of staff having to make copies, then make redactions by hand and recopy the
21 redacted documents, I asked if CCSD could scan the tickets and use redaction software to redact
22 information and send the redacted documents as a PDF or other digital file. CCSD did not
23 respond.
24

25 11. Then, in February 2012, CCSD notified NPRI that there were no audits
26 responsive to the request. The district provided clarification to their legal citations and provided
27 a new cost estimate — increased to \$900.00 from the original \$546.00 for staff to review and
28

1 redact confidential information plus an increase to \$390 for copies, up from the original amount
2 of \$220. (Here, CCSD attempted to charge twice the appropriate copying fees because they
3 calculated those fees based upon copying the record both before and after redaction).

5 12. In an effort to avoid litigation and find an amicable resolution, NPRI initiated a
6 meeting with then-superintendent Dwight Jones, which took place on April 30, 2012, and which
7 I attended.

8 13. Subsequent to that meeting but months later, in August of 2012, CCSD ultimately
9 produced the records on two CD Rom's, omitting information the district deemed confidential,
10 with no review, redaction or copy fees, some ten months after the initial request.
11

Case 2

13 14. Similarly, on January 30, 2012, I made a request for a list of CCSD facility rental
14 customers. Nearly one month later, CCSD responded with a cost estimate of \$2,796.00 —
15 \$176.10 for copy fees and \$2,619.90 for staff to review and redact confidential information.
16
17 Because the records were “only maintained electronically,” said CCSD, screen shots for each of
18 the 1,860 customer records would have to be “printed, reviewed, and confidential information
19 redacted.”

15. A modified request was sent to CCSD omitting the information CCSD deemed
21 confidential and offering to accept the records in standard exported digital formats such as Excel,
22 Access, CSV or tab-delimited. CCSD responded with a new cost estimate which eliminated the
23 fees for review and redaction but now included \$1,164.00 in new charges for staff to individually
24 access each customer record and print out a screen shot. The district would not produce the
25 records in a standard export format because, according to the District, “[t]he public records law
26
27 does not require the District to create a record that does not already exist.”

AFFIDAVIT OF KAREN GRAY -4

1 16. On March 29, 2012, I sent a renewed request for records to CCSD noting that the
2 customer records clearly existed in a database and did not need to be created; but rather by
3 exporting the records into a standard digital export format, CCSD could save district resources
4 and avoid, entirely, the need for staff to "individually access and print each of the approximately
5 2,000 electronic facility rental customer data entries." CCSD did not respond.
6

7 17. I also discussed this request with Superintendent Jones on April 30, 2012.
8
9 Ultimately, the District produced a PDF document listing the facility rental customers via email
10 on September 18, 2012, some eight months after the initial request and more than five months
11 after the renewed request.

One

19. On November 27, 2012, I submitted a public records request for "all equipment
20 inventory records for the CCSD police department for the last three years." Two days later,
CCSD responded with nothing more than a list of items which CCSD may or may not have had
in their inventory but without any indication of actual quantities or any information indicating as
to whether such items were in their inventory, at all. See Affidavit Attachment No. 1.

22 20. In light of the District's response, on November 29, 2012, I sent an e-mail
23 clarifying and providing a description of the planned usage of the requested records to track
24 inventory quantities and disposition of equipment.

21. In December 2012, the District began to produce various inventory reports, but
22. claimed confidentiality in regard to my request for inventory of school police firearms.

AFFIDAVIT OF KAREN GRAY - 5

1 ammunition, datacast receivers and antennas, citing NRS 239.010(1); NRS 179A.070(2)(a);
2 *Donrey of Nevada, Inc. v. Bradshaw*, 106 Nev. 630 (1990).

3 22. In January 2013, CCSD stopped producing these inventory reports and began
4 producing hundreds of purchase order and invoice records. No records regarding police firearms,
5 ammunition, datacast receivers and datacast antennae were produced. Nor could quantities still
6 in inventory be in any way discerned from those purchase orders and invoices.

7 23. In an attempt to avoid possible litigation, a letter was sent to Carlos McDade,
8 CCSD's general counsel. In response, CCSD counsel sent a letter expanding upon their basis of
9 confidentiality regarding police firearms, weapons and ammunition. However, the district did
10 not address their claims of confidentiality for the datacast receiver and antennae inventory
11 records and, in fact, made no mention of these records, whatsoever.

12 24. This six-month-old request remains unsatisfied.

13 *Case 4*

14 25. On May 21, 2013, I made a simple public records request to the office of the
15 Clark County Board of School Trustees for "the actual email, including all metadata, sent to
16 Trustee Chris Garvey which contained the letter she read into the record (from four legislators) at
17 the previous night's (5/20/13) school board meeting." I suggested that a simple "forward" of the
18 email would be adequate.

19 26. Later that same morning, I received an email notifying me that my request had
20 been forwarded to the District's public records liaison.

21 27. By June 4, 2013, I had not received a response to my request; thus, I sent an email
22 to school board staff and the district's public records liaison, seeking a status update.

23 28. As of 11:00 a.m. on Monday, June 10, 2013, I have not received a response.

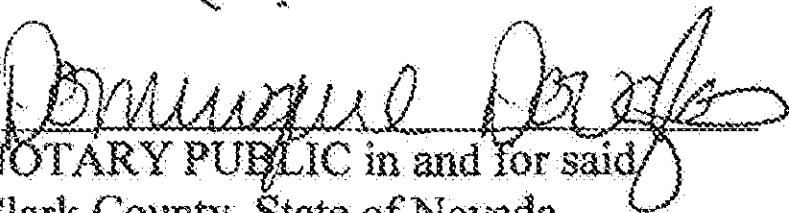
AFFIDAVIT OF KAREN GRAY - 6

1 29. This request is also still pending.
2
3

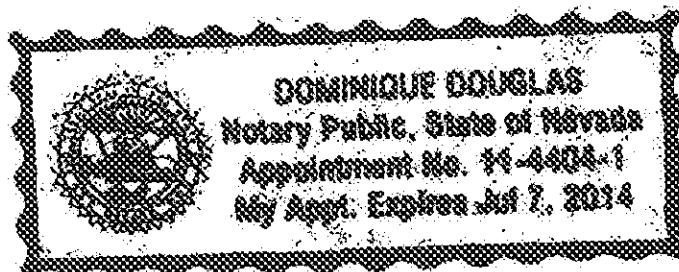
FURTHER SAYETH NAUGHT.

4 DATED: this 10th day of June, 2013.
5
6

7 Subscribed and Sworn to before
8 me on this 10th day of June, 2013.
9
10

11 
12 NOTARY PUBLIC in and for said
13 Clark County, State of Nevada.
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KAREN GRAY



AFFIDAVIT OF KAREN GRAY - 7

AFFIDAVIT ATTACHMENT 1

ITEM
BLAUER SUPERSHIRTS
SHORT SLEEVE
Small
Medium
Large
X-Large
XX-Large
XXX-Large
LONG SLEEVE
Small-Short
Small-Regular
Medium-Short
Medium-Long
Large-Short
Large-Regular
Large-Long
Large-Extra Long
Extra Large - Short
Extra Large - Regular
Extra Large - Long
Extra Large - Extra Long
XXL - Short
XXL - Regular
XXL - Long
XXL-Extra Long
BLAUER CLASS ACT POLY/WOOL SHIRT
14.5 X 33
15 X 33
15.5 X 33
15.5 X 35
15.5 X 37
16 X 33
16 X 35
16 X 37
16.5 X 33
16.5 X 35
16.5 X 37
17 X 33
17 X 35
17 X 37

BLAUER CLASS ACT POLY/WOOL SHIRT
17.5 X 33
17.5 X 35
17.5 X 37
18 X 33
18 X 35
18 X 37
19.5 X 33
19.5 X 35
19.5 X 37
MOCEAN ULTRAFLEX ZIP - OFF BIKE PANTS
Small
Medium
Large
Extra large
XX Large
XXX Large
XXXX - Large
Blauer Soft Shell Fleece Bike Jacket
Small
Medium
Large
Extra large
XX Large
XXX Large
XXXX - Large
Blauer 3 Season Jacket
Small
Medium
Large
Extra large
XX Large
5.11 Taclite Pro Pants
Small
Medium
Large
Extra large
XX Large

Item
5.11 Taclite Pro Long Sleeve Shirt
Small
Medium
Large
Extra large
XX Large
5.11 Taclite Pro Lite Trousers Men
34
36
38
40
44
46
48
5.11 Taclite Pro Lite Trousers Men
10
12
14
16
Three Inch Clip on Ties
Fletch Stretchable Polyester Cap
Badge Holder
Belt Duty
Small
Medium
Large
X-Large
Belt Under
Small
Medium
Large
X-Large
Flashlight Holder
Glove Pouch
Handcuff Pouch - SINGLE
Handcuff Pouch - DOUBLE
Holster-Pro 3 Slim Line Size 21 Right
Holster-Pro 3 Slim Line Size 21 Left

Keepers (SET OF 4)
Key Holder
Mag/Cuff Holder P/C Leather Right
Mag/Cuff Holder P/C Leather Left
Magazine Holder Divided Dbi Snap Closure
PC Holster for Glock Model 22 - 40 Right Black
PC Holster for Glock Model 22 - 40 Left Black
Radio Holder
Traffic Vest Police Size B ANSI Class 2 Safety Vest Law
OC Holder Mirage Basketweave
Metal Detector Super Scanner Garrett
OC Spray Sabre Red MK4 4.4 oz Cone
OC Spray Sabre Red MK9 18.5 oz Cone
Flashlight Streamlight Stinger Rechargeable Car
Flashlight replacement Bulbs Streamlight Stinger
Flashlight replacement Batteries Streamlight Stinger
ESB ASP Tactical Baton
ESB Holder Monodnac Front Draw Swivel
Handcuffs Peerless Nickel Hinged

EXHIBIT 2

Las Vegas Sun

District refuses request to release 'turnaround' schools' graduation data

By Paul Takahashi (contact) ■■■

Saturday, Dec. 29, 2012 | 2 a.m.



After agreeing to participate in a Las Vegas Sun project examining the Clark County School District's three "turnaround" high schools, the district gave Sun reporters exceptional access to the schools and provided most of the news organization's requests for data.

But despite its proclamations of being transparent with the community, the district has refused to grant repeated public records requests from the Sun for graduation data from the three schools.

Last year, the School District took part in an unprecedented national experiment in public education. Drastic measures were undertaken at three of the worst-performing schools in the valley — in a spirited effort to improve student achievement.

After being awarded \$8.7 million in federal School Improvement Grant money, the district replaced principals and hundreds of staff at Chaparral, Mojave and Western high schools. Other major changes included new student programs and teacher trainings, lengthening the school day and cleaning up campuses.

The Sun was granted access to the schools as part of a yearlong look at the district's turnaround efforts. The findings — while largely anecdotal — were sobering, and illuminated the daunting challenges facing Nevada's education system and children.

For the past four months, the Sun has been requesting that the district provide a variety of student data to demonstrate quantitatively the gains made at the turnaround schools during the 2011-12 school year.

The district complied with most of the Sun's requests for data, such as the number of discipline incidents, teacher turnover and average daily attendance rates. However, it has declined to release a key indicator of the turnaround's success: graduation rates for the class of 2012.

Typically, there is a yearlong lag in reporting graduation data, because the state Department of Education takes the better part of a year to verify those numbers, said Leslie Arnold, the district's director of assessment, accountability, research and school improvement.

However, to illustrate the impact of the district's graduation initiative — "Reclaim Your Future" — and its turnaround efforts last school year, the Sun requested that the district release its preliminary graduation rate data ahead of the state release.

This was not an unusual request. The School District has released preliminary graduation data in the past.

In early June, it conducted a news conference at Clark High School to tout an anticipated 6 percent increase in its districtwide graduation rate for the class of 2012. The announcement was made before even a single graduation ceremony had taken place in the district.

When the state released its report card for the School District this fall, the verified district graduation rate — which included Clark County's first-ever August graduation — was actually 66 percent. That represented a 3 percent difference from the district's June estimate of 65 percent.

Ric Anderson, managing editor of the Sun, said the news organization was surprised and disappointed by the district's refusal to release the individual schools' graduation rates.

"We appreciate that the School District gave our reporters access to the turnaround schools and provided us with the vast majority of the documentation we sought. But we simply don't understand why the district, after making a commitment to transparency, would choose not to share the graduation figures with the community," Anderson said. "There's no legal requirement for the district to withhold the information. In addition, we assured the administration we would explain to our readers that these are preliminary figures that would need to be verified by the state before becoming official. Yet the district wouldn't budge. That's unfortunate, because it creates a perception that the district has something to hide."

Despite releasing preliminary graduation data in the past, the School District spurned repeated requests from the Sun dating to Aug. 14. After months of talks, the district summarized the graduation results in a Dec. 18 letter:

"We are proud to share that preliminary data from 2012 shows a significant increase in graduation rate at two of our turnaround schools, Western High School and Chaparral High School," the district said, without giving any specifics. "The third school, Mojave High School, also showed improvement, though not as significant."

The district also argued it was unable to make the preliminary data public "until they are verified" by the state Education Department.

"The information you requested is not required to be produced under Nevada's public records law as the materials are worksheets/workpapers, (and) are subject to the deliberative process privilege, and the balancing of interests weighs in favor of non-disclosure until the results have been verified and finalized," according to the district's legal department.

The district's argument is "just absurd," said Barry Smith, executive director of the Nevada Press Association. Smith has testified several times before the Legislature as an expert on open meeting and public records laws.

"It's a real stretch to claim that this is some kind of work in progress," Smith said. "It's like saying you can't read a bill draft before the Legislature passes it, or look at a city ordinance before the city council approves it."

Moreover, the preliminary graduation rates — even if unverified by the state — still are public documents financed by taxpayer dollars, Smith said. Open records law specifies the district must cite a legal statute that exempts it from releasing public information.

"All records are perceived to be open unless there is a specific exception by law," Smith said. "(Graduation rates) are a matter of public record."

Although the School District claims it has no legal obligation to release graduation data because it considers them "worksheets/workpapers," nowhere in its two-page letter does it cite a state law that prohibits it from releasing this data, Smith said.

According to Clark County Schools Superintendent Dwight Jones, the district also was worried its preliminary graduation data could be incorrect because Nevada is changing the way it calculates the graduation rate.

"The state has a new graduation rate calculation ... and I just want to make sure it's not confusing," Jones said in an interview before the letter of denial was released. "Doing a preliminary calculation has the risk of sending mixed signals to the community."

However, this means the School District could be using potentially faulty graduation numbers to issue star ratings to its 49 high schools this year, calling into question the credibility of the district's school-ranking system.

Moreover, the Education Department has no issue with school districts releasing preliminary graduation rate data, officials said. The Education Department is verifying graduation data for all 17 school districts in Nevada, but ultimately, it's the district's data, said Diane Mugford, an education programs professional with the department.

State superintendent Jim Guthrie said he did not know of any law that prohibited school districts from releasing preliminary graduation rate data.

"It's amazing how people invent state laws when they don't want to give out information," he said.

Jones — who is in his second full year as superintendent — came to Las Vegas promising to bring transparency and accountability to the nation's fifth-largest school district.

He has made significant strides in this endeavor, notably by releasing report cards for all 357 schools, keeping an online journal and issuing annual white papers on the district's progress. However, the School District under Jones also has been increasingly criticized for being less than open with the community.

It took the School District nine months to release traffic citation data to the Nevada Policy Research Institute, a libertarian think tank that was investigating school police issuing tickets outside of their jurisdiction.

Even the district's school-ranking system — which was heralded last year for being a transparent way for families to see how their schools performed — was criticized for not clearly disclosing the fact that a school's highest rating stands for two years.

That meant Andre Agassi College Preparatory Academy — a four-star charter school that dropped to two stars this year — remained a four-star school. That irked a couple of School Board members, who argued the district was masking its low-performing schools from the public.

"The fundamental reason for government transparency is to build trust among taxpayers, parents and constituents of a school district," Smith said. "All it takes is a little bit to erode that trust."

You might also like



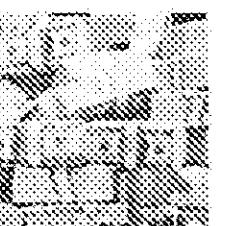
Metro ID's former
MLB all-star Jose
Canseco as suspect
in sexual assault.



Stripper had
consumed alcohol,
Xanax before fatal
accident, police say



Photos: Pamela
Anderson, Adrian
Grenier, Coco
Austin, Dennis
Rodman, Robert
Horry, Crystal
Hefner and porn
stars celebrate
Sapphire Pool
opening



New York woman
hits \$1.1 million
jackpot at
Flamingo



Bill capping costs
for cancer
treatment pills
headed to
governor

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http://www.lasvegassun.com/news/2012/dec/29/district-refuses-request-release-turnaround... 5/30/2013

EXHIBIT 3

Rick Scott

45th Governor of Florida

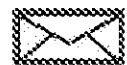
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Office of Governor Rick Scott
State of Florida
The Capitol
400 S. Monroe St.
Tallahassee, FL 32399-0001

(850) 488-7146

Under Florida law, all correspondence sent to the Governor's Office, which is not exempt or confidential pursuant to Chapter 119 of the Florida Statutes, is a public record. All public record electronic mail sent through this website will be posted to Project Sunburst at <http://www.flgov.com/sunburst>, and will be accessible to the public. If you do not want the public record contents of your e-mail or your e-mail address to be published on this website or to be provided to the public in response to a public records request, please do not send electronic mail to this entity.

Please be aware that personal information sent in your correspondence, such as home addresses and telephone numbers, may be posted to the Sunburst public records website.



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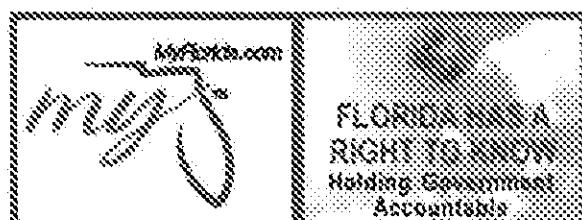
Comments are closed.

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Please click here to view and save recent event photos.

[Governor Scott's Photo Gallery](#)



[Contact Governor Scott](#)

EXHIBIT 4

1 AFFT
2 JOSEPH F. BECKER, ESQ.
3 Nevada State Bar No.: 12178
4 NPRI CENTER FOR JUSTICE AND
5 CONSTITUTIONAL LITIGATION
6 1225 Westfield Ave., Suite #7
7 Reno, NV 89509
8 Tel: (775) 636-7703
9 Fax: (775) 201-0225
10 Email: cjcl@npri.org

8
9 DISTRICT COURT
10 CLARK COUNTY, NEVADA

11 NEVADA POLICY RESEARCH
12 INSTITUTE, INC.,

13 Plaintiff,

14 vs.

15 CLARK COUNTY SCHOOL DISTRICT, a
16 political subdivision of the State of Nevada;
17 THE NEVADA PUBLIC EDUCATION
18 FOUNDATION; and THE PUBLIC
19 EDUCATION FOUNDATION;
20 Defendants.

Case No.: A-13-679114-C
Dept. No.: VIII
Docket No.:

AFFIDAVIT OF VICTOR JOECKS IN
SUPPORT OF PLAINTIFF'S OPPOSITION
TO DEFENDANT CLARK COUNTY
SCHOOL DISTRICT'S MOTION TO
DISMISS

Date of Hearing: July 2, 2013
Time of Hearing: 8:00 a.m.

21 COUNTY OF CLARK }
22 STATE OF NEVADA }

23 I, VICTOR JOECKS, being first duly sworn, depose and state as follows:

24 1. I, VICTOR JOECKS, am a resident and citizen of Clark County, in the State of
25 Nevada.

26 2. I am an employee of and Communications Director for Nevada Policy Research
27 Institute, Inc., (hereinafter "NPRI").

1 3. This Affidavit is made in support of PLAINTIFF'S OPPOSITION TO
2 DEFENDANT CLARK COUNTY SCHOOL DISTRICT'S MOTION TO DISMISS. It is based
3 upon my personal knowledge and I am competent to testify to the matters contained herein.
4

5 4. With an eye towards research and government accountability, NPRI seeks out
6 and publishes information relating to government activities and, as such, I regularly send or
7 oversee the sending of correspondence to governmental entities requesting information under the
8 Nevada Public Records Act (hereinafter "the NPRA").
9

10 5. Beginning on or about April 8, 2013, I either requested or instructed another
11 employee of NPRI to request a directory of government-provided teacher email addresses from
12 each of the 17 school districts in Nevada, the exception being the Clark County School District
13 (CCSD) as I had previously requested a directory of government-provided teacher email
14 addresses from CCSD on or about June 11, 2012.
15

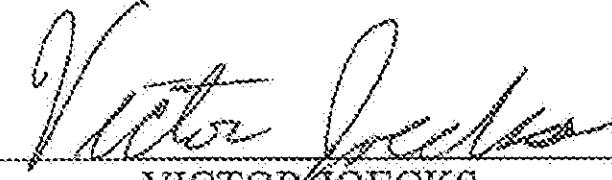
16 6. As of this date, I have received what I believe to be complete government-
17 provided teacher email address directories from 12 school districts in Nevada. The Clark County
18 School District, however, is not among those entities who have complied with NPRI's public
19 records requests. Of the twelve responsive school districts, seven ---- Carson City, Elko,
20
21 ///
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25 ///
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27 ///
28 ///

1 Esmeralda, Eureka, Humboldt, Lander and Storey — make government-provided teacher email
2 address directories publicly available on their websites.

3 FURTHER SAYETH NAUGHT.
4

5 DATED: this 10 day of June, 2013.

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VICTOR JOECKS

Subscribed and Sworn to before
me on this 10 day of June, 2013.


NOTARY PUBLIC in and for said
Clark County, State of Nevada.

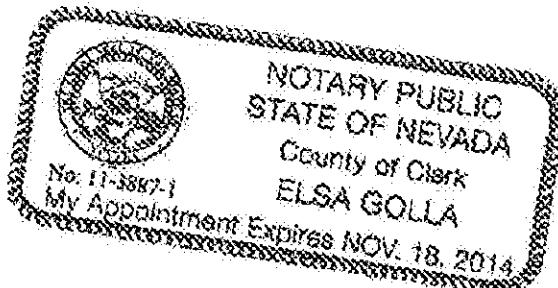
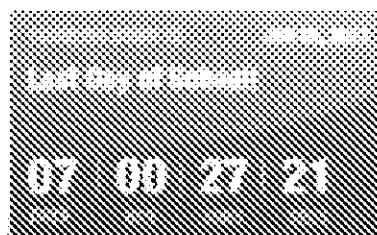


EXHIBIT 5



GENERAL INFO CALENDARS ACTIVITIES ATHLETICS COUNSELING DOCS & DOWNLOADS



CLOCK LINKS

[Home Page](#)

[Telephone Directory](#)

[Bell Schedule](#)

[School Newsletter](#)

[Master Calendar](#)

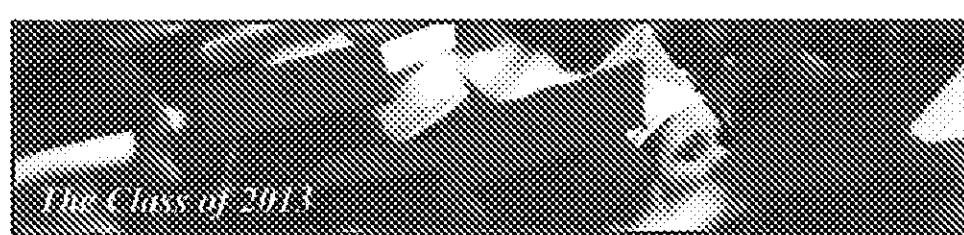
[Course Catalog \(PDF\)](#)

[STATE REPORTS](#)

[Quality Assurance Report](#)

[Accountability Report](#)

[School Improvement Plan](#)



COMMENCEMENT

Friday, June 7, 2013

9:00am

The Orleans Arena

WELCOME! HERE'S WHAT'S NEW AT BASIC HIGH SCHOOL!

FINAL EXAM SCHEDULE

Final exams begin for Seniors in periods 5 and 6 only on May 29th and 30th. All students will take their period 7 exams on Friday, May 31st with a modified bell schedule. District half-days for underclassmen exams (periods 1 - 6) begin on Monday, June 3rd. [CLICK HERE](#) to view the Final Exam information page.

NO BACKPACKS OR LARGE PURSES will be permitted on campus during the three final exam half-days on June 3rd, 4th and 5th. Any backpacks or large bags brought onto campus on those days are subject to confiscation and search.

The 2013 El Lobo yearbook has arrived! Students who pre-purchased a yearbook and have not picked it up yet should see Ms. Gasbarino in room 140. Students who want to buy a yearbook need to visit the school bank and buy one from the banker, Ms. Bair. The cost of the yearbook is \$60. Get yours today!

Basic's graduation date is right around the corner! The ceremony will take place on Friday, June 7th at 9:00am at the Orleans Arena. [Click here](#) for more info and to view the Commencement Countdown clock!

Senior Awards Night will be held on Wednesday, May 29th at 6:00pm in the main gym. This event is an important element of the graduation season where Seniors have the opportunity to be recognized for their achievements while attending Basic High School.

SENIOR BBQ

The Senior BBQ has been rescheduled to Thursday, May 30th. It will still be in the Quad and will begin immediately following the Powderpuff Football game (approximately 2:30pm).

Several BHS groups will be operating fireworks booths this summer. Please support these groups by purchasing your fireworks from them. The booths will be open from June 28 - July 4. The groups & locations are: Mens Volleyball (7-11 at Horizon & Pacific), Wolfpack Regiment (by Food4Less in the Wal-Mart plaza near Boulder Highway & Lake Mead). Your support will be greatly appreciated!

WOLFPACK

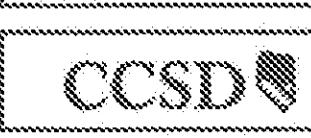
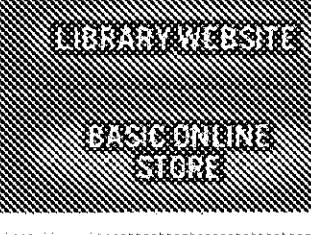
Congratulations to Austin McDonald, Darin Klein, William Fitzpatrick and Dylan Green for receiving 2nd Team All-League honors for the 2013 season in Mens Volleyball. Way to go, Wolves!

The 2013-14 football schedule for the Wolfpack has been released. The games are: September 7th at Green Valley, September 12th at Las Vegas, September 20th vs. Canyon Springs, September 27th vs. Valley (Homecoming), October 4th at Eldorado, October 11th vs. Foothill, October 18th at Del Sol, October 24th at Liberty and November 1st vs. Coronado.

SCHOLARSHIPS

Updated scholarship listings have been posted by the Counseling Office dated 4/16/13. [Click here](#) for more information.

2013 Summer School information is currently available in the Counseling Office. [Click here](#) to view the informational flyer. Students needing to attend summer school should contact their counselor if they have any questions.





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SEARCH

TEACHING STAFF

2012 - 13 FACULTY

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- [Self Schedule](#)
- [School Newsletter](#)
- [Master Calendar](#)
- [Course Catalog \(2008\)](#)
- [State Reports](#)
- [Quality Assurance Report](#)
- [Accountability Report](#)
- [School Improvement Plan](#)

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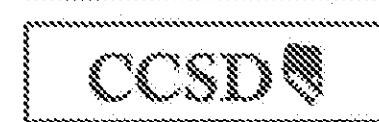
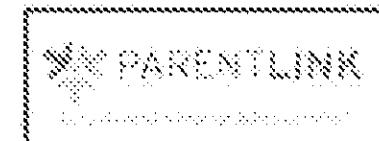
QUICK LINKS

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- [STATE REPORTS](#)
- [Quality Assurance Report](#)
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- [School Improvement Plan](#)

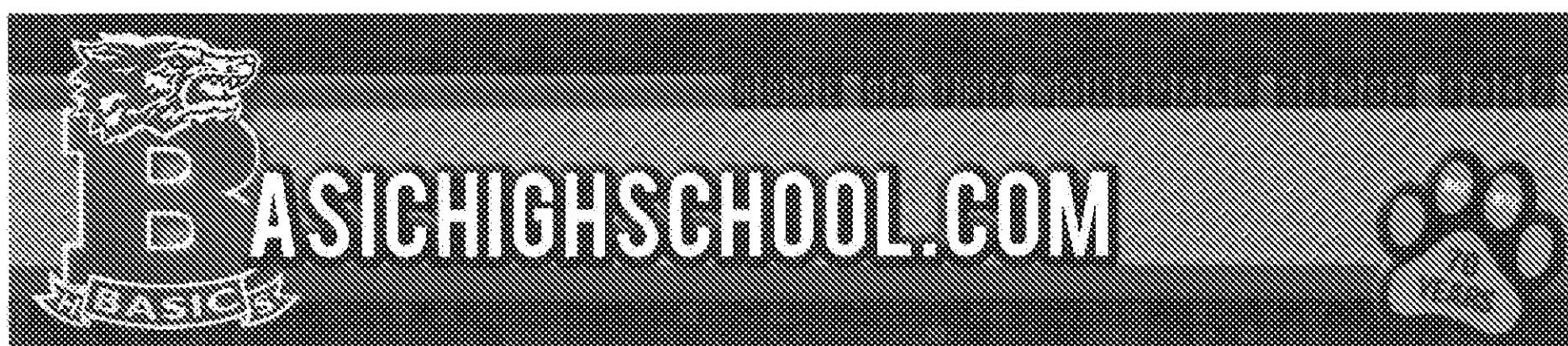
REPORT CARDS

CLASS ROSTERS

ENROLLMENT



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FACULTY

2012 - 13 FACULTY

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CURRICULUM

Name/Title

TEACHER

CLASS

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[REPORT CARDS](#)

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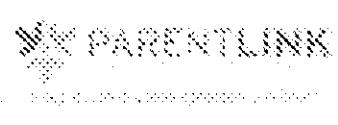
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2012 - 13 FACULTY

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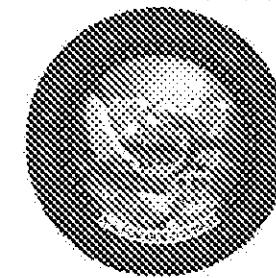
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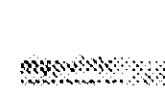
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Cannon Junior High School

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Phone: 702-799-5600
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Helen C. Cannon Jr. High School



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Faculty

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Fax: 702-799-5644

Will Not Work At School (for students)



Staff Picture 2012-2013

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Valicevic, Beth	bvalicevic@ccsdcnv.k12.nv.us	ext. 3602	US/Nevada History
-----------------	------------------------------	-----------	-------------------



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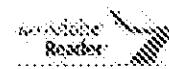
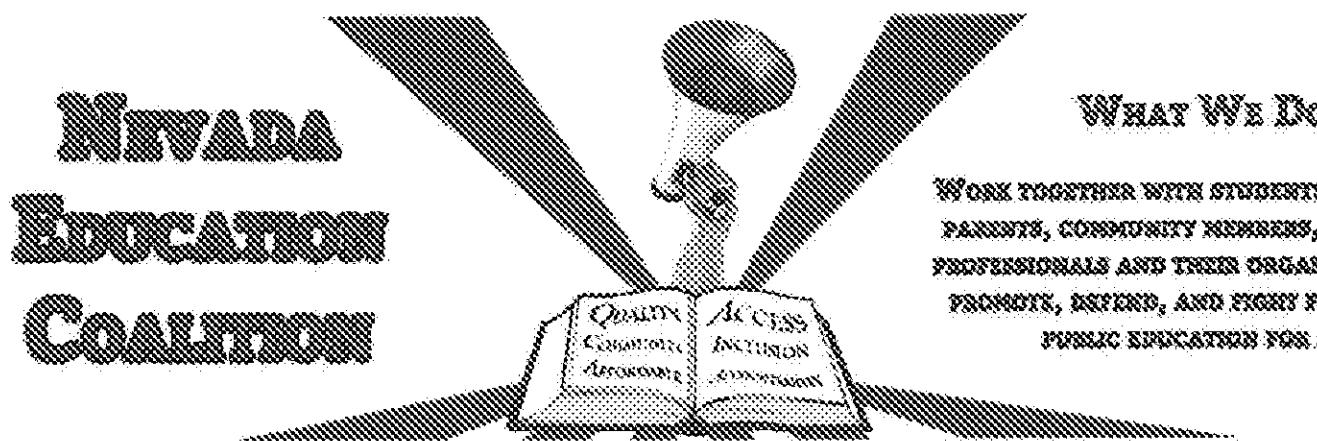


EXHIBIT 6


[Mission](#) [Guide to Advocacy](#) [Community Voices](#) [Research](#) [NV Action Alert](#) [Education History](#)

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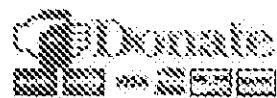
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A loosely organized affiliation (LOA) of community groups concerned with the quality of education in our state.

EXHIBIT 7

cjcl@npri.org

From: Victor Joecks
Sent: Wednesday, May 29, 2013 10:13 AM
To: cjcl@npri.org
Subject: FW: Education Town Hall Meeting
Attachments: April27townhallmeetingColor.pdf; CapitalCountownContinued.pdf

A recipient of the email below who would prefer to remain anonymous forwarded this email to me. The content indicates that the Clark County School District email list is being used by a school district employee himself to promote education-related political activity.

Sincerely,

Victor Joecks
Communications Director, Nevada Policy Research Institute
7130 Placid Street, Las Vegas, NV 89119
(702) 222-0642, vj@npri.org, npri.org

Like us on Facebook or follow us on Twitter [@NevadaPolicyRI](#)

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

From: "Karl T. Byrd" <KTB532@interact.ccsd.net>
Date: Mon, Apr 22, 2013 at 08:07 AM
Subject: Education Town Hall Meeting
To: "Karl T. Byrd" <KTB532@interact.ccsd.net>
Cc: "Abby K. Bosgieter" <akbosgieter@interact.ccsd.net>, "Aimee B. Shreve" <abshreve@interact.ccsd.net>, Alain Rivard <arivard@interact.ccsd.net>, Alba Arango <aarango@interact.ccsd.net>, Alejandro Grimaldo <AGrimal@interact.ccsd.net>, "Alice C. Watson" <ACW510@interact.ccsd.net>, "Alison C. Lax" <70alison@interact.ccsd.net>, "Alissa M. Garcia" <amgarcia@interact.ccsd.net>, Amaia Arostegui <aarostegui@interact.ccsd.net>, "Amanda R. Decker" <deckear@interact.ccsd.net>, "Amber L. Geremia" <algeremia@interact.ccsd.net>, "Amparo V. Johnson" <avjohnson@interact.ccsd.net>, Amy Addante <aaddante@interact.ccsd.net>, "Amy M. Butler-Coleman" <ambutler-colema@interact.ccsd.net>, "Anais G. Novak" <agnovak@interact.ccsd.net>, Andrea Strachan <astrachan@interact.ccsd.net>, Andres Toledo <atoledo@interact.ccsd.net>, "Andrew J. Magness" <ajmagness@interact.ccsd.net>, "Andrew N. Lenselink" <anlenselink@interact.ccsd.net>, "Angela C. Moorehead" <acmoorehead@interact.ccsd.net>, "Angela G. Angers" <agangers@interact.ccsd.net>, "Angela M. Smith" <amsmith1@interact.ccsd.net>, "Angelia K. Jimenez" <AKJimene@interact.ccsd.net>, Ann-Jeanette Rodriguez Tucker <atucker@interact.ccsd.net>, "Anna P. Thackeray" <athackeray@interact.ccsd.net>, AnnaMarie Manterola <amanterola@interact.ccsd.net>, "Anne E. England" <aeengland@interact.ccsd.net>, Annie Nguyen <anguyen@interact.ccsd.net>, "Anthony E. Gebbia" <AEGebbia@interact.ccsd.net>, April Poma Paine <APP524@interact.ccsd.net>, "Arlene I. Hayman" <haymaai@interact.ccsd.net>, Ashley Hardison <ahardison@interact.ccsd.net>, "Avant D. Gates Sr" <adgatessr@interact.ccsd.net>, "Barbara A. Akbari" <bacurras@interact.ccsd.net>, "Barbara A. Grogan" <grogaba@interact.ccsd.net>, "Barbara J. Yamaguchi" <byamaguchi@interact.ccsd.net>, "Barbara L. Musso" <bmusso@interact.ccsd.net>, Barbara Moran <BAM20@interact.ccsd.net>, "Becky A. Davis" <badavis@interact.ccsd.net>, "Becky J. Pike" <bjpike@interact.ccsd.net>, Beth Ralston <bralston@interact.ccsd.net>, "Betty J. Parker" <BNP947@interact.ccsd.net>, "Bianca T. Contreras"

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Dear Staff,

Thank you for your continued support of the 2013 Teacher Big Five Agenda. Our next big effort will take place on Saturday, April 27, 2013 from 9 – 10:30 am at the Western High School – Theatre. The address is 4601 W. Bonanza Rd at the corner of Decatur and Bonanza right off I-95 N.

The event is an education town hall meeting focusing on the issue of class size reduction. This meeting is extra special because we are making a big push to bring parents and students to this event.

Recently, letters and flyers were sent home to parents detailing this event, how parents can be involved and how students can receive grade credit for studying the current education bill proposals and attending the town hall meeting.

Here is the list of those Legislators that will be at the Town Hall meeting:

Democrats	Republicans
Dina Neal	Paul Anderson
Elliot Anderson	Wesley Duncan
James Healey	Mark Hutchison
Moises Denis	Scott Hammond
David Parks	Michael Roberson
Justin Jones	
Joe Hogan D	

Now it is our chance to voice the concerns we have directly with these legislators as we did with our blue reduce class size in Clark County postcards. Join us, bring your family, wear your Knudson faculty shirts, More 4 schools buttons and take part in this critical conversation. Working together we will make sure that students and teachers enjoy the best learning environment. This is the last big event before the legislative session votes on various education bill beginning in early May 2013. If you intend to come to the meeting indicate by replying back to this email include if you are planning to bring other family members and will encourage other teachers to attend.

I will keep a daily tally this week of the teachers who will be attending the town hall meeting This Saturday.
Together in solidarity,

Yours Truly,

Karl T. Byrd

Karl Byrd

Legislative Action Team OI Zone 9

K.O. Knudson Middle School

2400 Atlantic Street

Las Vegas, NV 89104

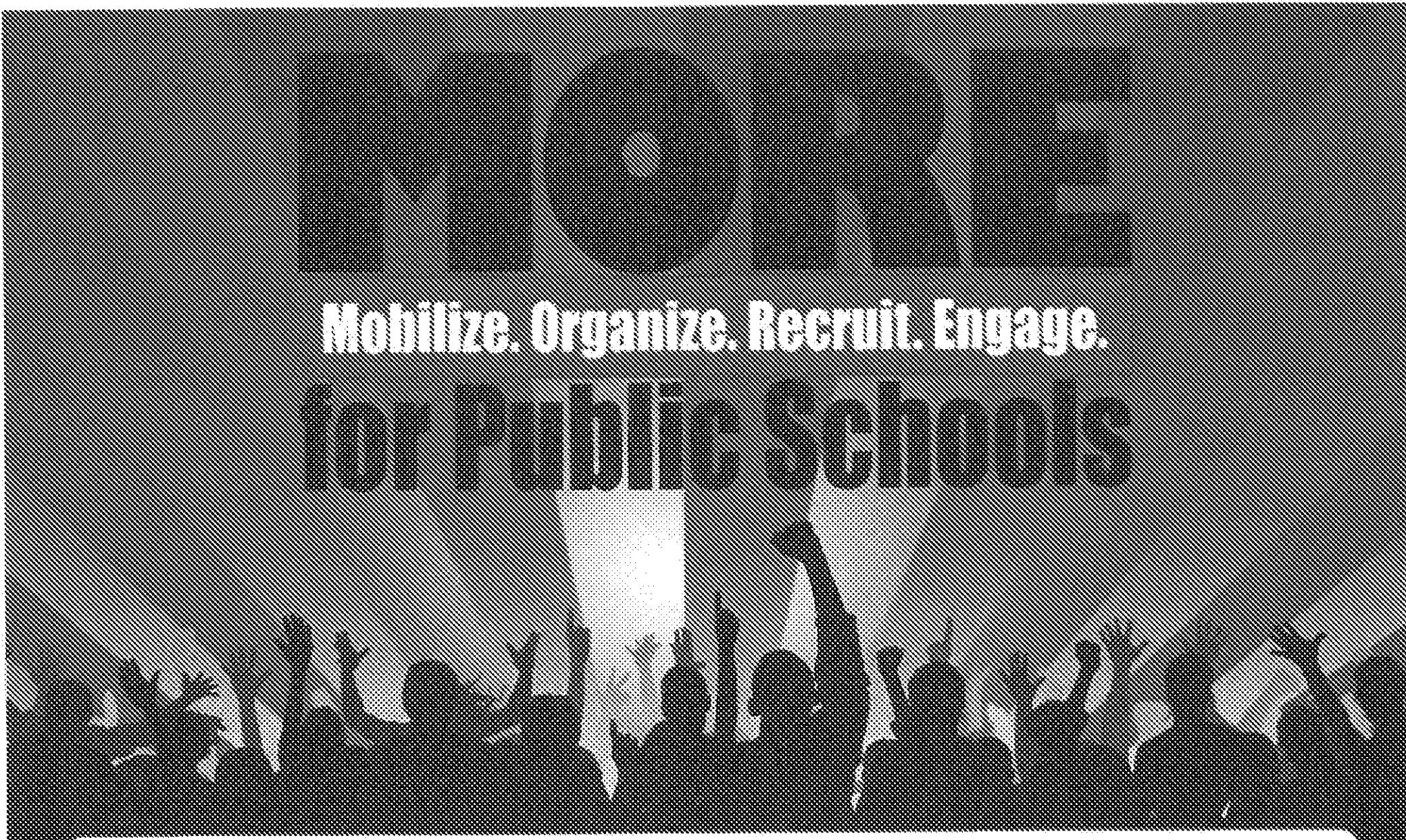
702-203-6424

[mailto:KTB532@INTERACT.CCSD.NET] KTB532@INTERACT.CCSD.NET

[mailto:hhistoryboy1@aol.com] hhistoryboy1@aol.com

" Human progress is neither automatic nor inevitable. . . Every step towards the goal of justice requires sacrifice, suffering, and struggle; the tireless exertions and passionate concerns of dedicated individuals".

Martin Luther King Jr.



Mobilize. Organize. Recruit. Engage.

Education Town Hall Meeting

Saturday, April 27, 2013 @ 9 am

Overcrowded classrooms: the epidemic infecting nearly all of our public schools. On Saturday, April 27th, we will have an opportunity to radically improve our teaching environment. Clark County legislators are committed to participate in this town hall conversation to learn about the realities overcrowded classrooms create.

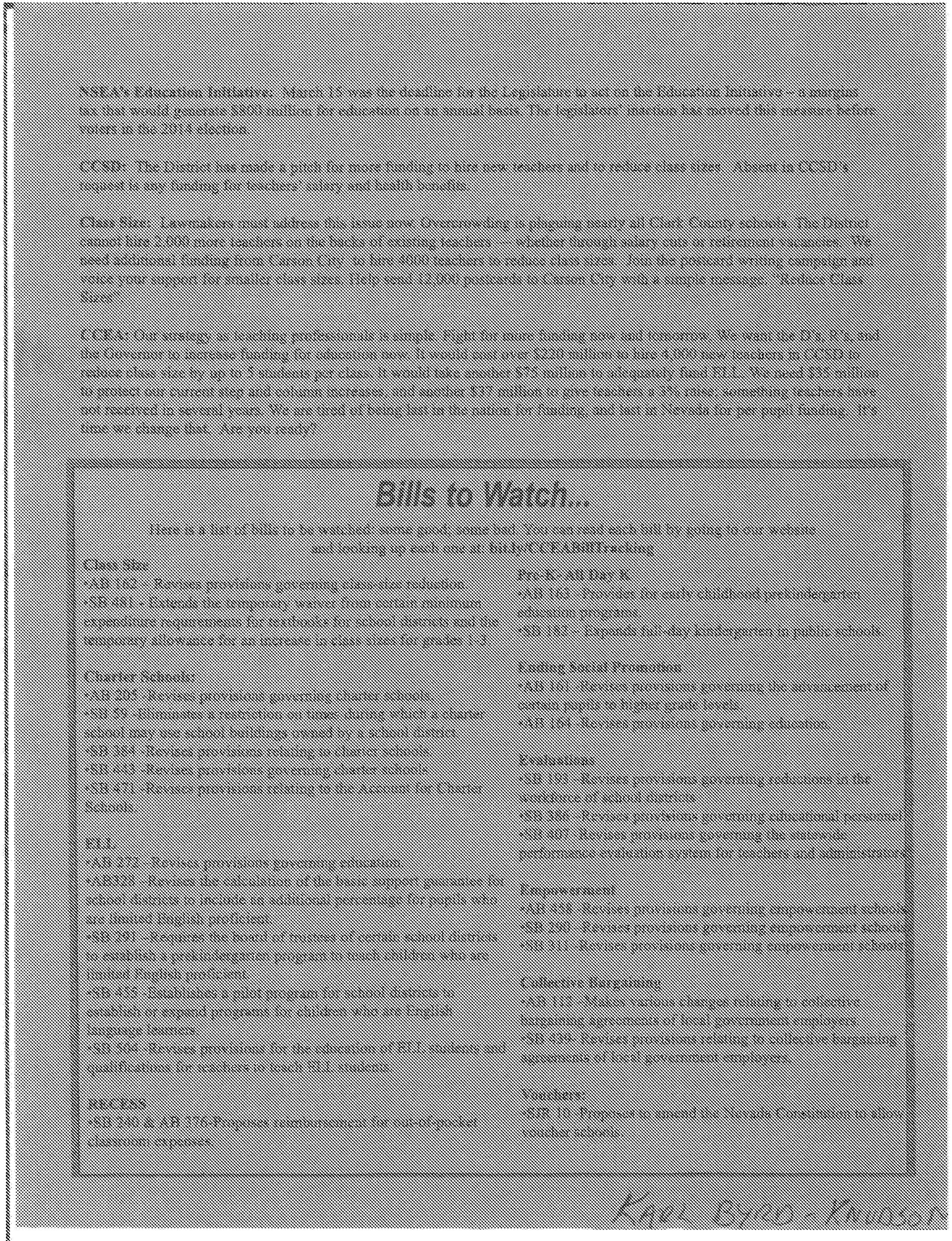
You, our teaching professionals, know firsthand the consequences overcrowded classrooms have on our students and how far-reaching and devastating those consequences are to their success, so we must speak up!

Working together we will make our case for the need to create stable, adequate funding for education. It's time Nevada provides adequate funding for education – without it, our students and teachers cannot succeed.

**Join us Saturday, April 27 @ 9 a.m.
Western High School - Theatre**

(4601 W. Bonanza Rd – corner of Decatur/Bonanza, off I-95 N)

Legislators Must Hear from You – JOIN US!



cjcl@npri.org

From: Victor Joecks
Sent: Wednesday, May 29, 2013 10:13 AM
To: cjcl@npri.org
Subject: FW: Education Town Hall Meeting 4/27/13
Attachments: Capital Countdown II.pdf

A recipient of the email below who would prefer to remain anonymous forwarded this email to me. The content indicates that the Clark County School District email list is being used by a school district employee himself to promote education-related political activity.

Sincerely,

Victor Joecks
Communications Director, Nevada Policy Research Institute
7130 Placid Street, Las Vegas, NV 89119
(702) 222-0642, vj@npri.org, npri.org

Like us on Facebook or follow us on Twitter [@NevadaPolicyRI](#)

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

From: Karl T. Byrd <KTB532@interact.ccsd.net>
Date: Wed, Apr 24, 2013 at 9:54 AM
Subject: Education Town Hall Meeting 4/27/13
To: Abby Dagley <adagley@interact.ccsd.net>, "Amanda C. Kirby" <ackirby@interact.ccsd.net>, "Amy J. Symes" <ajsymes@interact.ccsd.net>, "Betty G. Buehler" <bgbuehler@interact.ccsd.net>, "Cara J. Heck" <cjheck@interact.ccsd.net>, "Cheryl M. Pullen" <CPullen@interact.ccsd.net>, "Christina M. Frost" <cmfrost@interact.ccsd.net>, "Christine W. Hulett Christmas" <cchristmas@interact.ccsd.net>, "Christy A. Swadkins" <caswadkins@interact.ccsd.net>, "Craig S. Cairns" <escairns@interact.ccsd.net>, Curtis Krohn <ckrohn@interact.ccsd.net>, "Daniel T. O'Brien" <dtobrien@interact.ccsd.net>, "Danielle M. Beck" <dmbeck@interact.ccsd.net>, David Heide <dheide@interact.ccsd.net>, "Dawn C. Schlink" <dcschlink@interact.ccsd.net>, Delphine Allen <dallen1@interact.ccsd.net>, "Dona J. Prock" <DJP532@interact.ccsd.net>, "Douglas M. Larson" <DML532@interact.ccsd.net>, "Edward R. Jackson" <ERJackson@interact.ccsd.net>, "Elysia A. Garcia" <egarcia@interact.ccsd.net>, "Gordon H. Okelberry" <GHO532@interact.ccsd.net>, "Heather B. Rampton" <hbrampton@interact.ccsd.net>, "Jessica J. Cimino" <jjcimino@interact.ccsd.net>, "John D. Banes" <jdbanes@interact.ccsd.net>, "John E. Rehill" <JER532@interact.ccsd.net>, "John L. Parker" <jparker@interact.ccsd.net>, Kathy Buffington <kbuffington-lac@interact.ccsd.net>, "Katie L. Borden" <kborden@interact.ccsd.net>, Katja Hermes <KHH541@interact.ccsd.net>, "Kelvin D. Myles" <KDM276@interact.ccsd.net>, "Kevin R. Thomas" <KRT532@interact.ccsd.net>, Kristi Odom <kodom@interact.ccsd.net>, "Lesley K. Mosher" <LKM532@interact.ccsd.net>, "Lindsey R. Springer" <lrspringer@interact.ccsd.net>, "Lori A. Jackson" <laajackson2@interact.ccsd.net>, "Lynette B. Martin" <LBM532@interact.ccsd.net>, "Maria L. Ojeda" <oqedam1@interact.ccsd.net>, Mario Maldonado <mmaldonado@interact.ccsd.net>, "Mary F. Miller" <MFM934@interact.ccsd.net>, "Maureen M. Polster" <mmpolster@interact.ccsd.net>, "Melissa A. Neyman" <neymama@interact.ccsd.net>, "Milton R. Irvin" <MRIS32@interact.ccsd.net>, Pompeya Gettler <lpgettler@interact.ccsd.net>, "Raymond J. Olsen Jr" <Ray_Olsen@interact.ccsd.net>, Rosalyn Harrison

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Dear Staff,

Attached is the latest Capitol Countdown Issue including the following information:

1. An overview of the important April 27, 2013 Education Town Hall Meeting.
2. The recent Education Town Hall meeting held in Senate District Five.
3. The current bills to watch in this legislative session.

As we have done for all of the other forums and rallys that have been held during this past school year, we are asking you to bring your family, wear your faculty shirts, More 4 schools buttons and take part in this critical conversation. Working together we will make sure that students and teachers enjoy the best learning environment. This is the last big event before the legislative session votes on various education bill beginning in early May 2013. If you intend to come to the meeting indicate by replying back to this email include if you are planning to bring other family members and will encourage other teachers to attend. There are twenty Teacher Big Five zones with at least 10 schools per zone. Our goal is to have twenty teachers per per zone represented as well as parents, students and other concerned Nevadans who are interested in the plight of education throughout the state. Ninety minutes for our children, education and the teaching profession this Saturday from 9:00 am to 10:30 am at the Western High School -- Theater. The address is 4601 W. Bonanza Rd at the corner of Decatur and Bonanza right off I-95 N.

Here is the list of those Legislators that will be at the Town Hall meeting:

Democrats	Republicans
Dina Neal	Paul Anderson
Elliot Anderson	Wesley Duncan
James Healey	Mark Hutchison
Moises Denis	Scott Hammond

David Parks
Justin Jones
Joe Hogan

Michael Roberson

If you plan to join us for the 90 minute session Saturday reply to this email ASAP and I will reserve you a spot.

Thank you very much for support with the blue postcards and I look forward to seeing everyone on Saturday.

Together in solidarity,

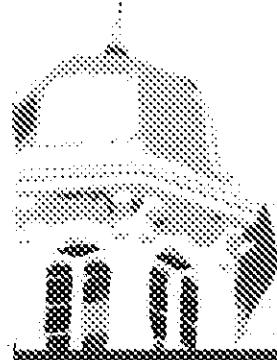
Yours Truly,

Karl S. Byrd

Karl Byrd
Legislative Action Team Of Zone 9
K.O. Knudson Middle School
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Las Vegas, NV 89104
702-203-6424
KTB532@INTERACT.CCSD.NET
hhistoryboy1@aol.com

" Human progress is neither automatic nor inevitable. . . Every step towards the goal of justice requires sacrifice, suffering, and struggle; the tireless exertions and passionate concerns of dedicated individuals".

Martin Luther King Jr.



CAPITOL COUNT DOWN

A Legislative Update by the Clark County Education Association

In 42 days, the next two years of your professional future will be determined.

Vol. 1, Issue 3

April 22, 2013

Saturday, April 27th - 9am @ Western HS

Help put an end to overcrowded classrooms in our schools

As teaching professionals we know firsthand the impact overcrowded classrooms have on our students and their education. We know, too well, that when classrooms are packed to the max, our ability to provide one-on-one instruction is greatly diminished or nearly eliminated; and that the learning our students should be doing is not taking place.

On Saturday, April 27, 2013, at 9:00 a.m., we will have an opportunity to drastically improve our students' learning environment, as well as our teaching conditions. Clark County legislators are committed to attend and hear our concerns. They will learn about our classroom realities. As the frontline educator, you must come out and share with legislators the impact overcrowded classrooms have and the advantages to reducing class sizes in our schools. You know what is necessary to radically improve the learning & teaching setting.

So, mark your calendar and join us at Western High School, this Saturday, April 27 @ 9:00 a.m. Talk with your colleagues, neighbors, and friends about the critical need to put an end to overcrowded classrooms. Parents, students, and community members must unite their voices.

JOIN US! Together we will ensure legislators make public education the #1 priority this legislative session. Our students cannot afford to wait any longer. We cannot afford to wait any longer.

Saturday, April 27

9:00 a.m.

Theatre @ Western HS

4601 W. Bonanza Rd
corner of Decatur/Bonanza,
off I-95 N

*Confirm your attendance @
www.ccea-nv.org.*

Teachers Speak Up

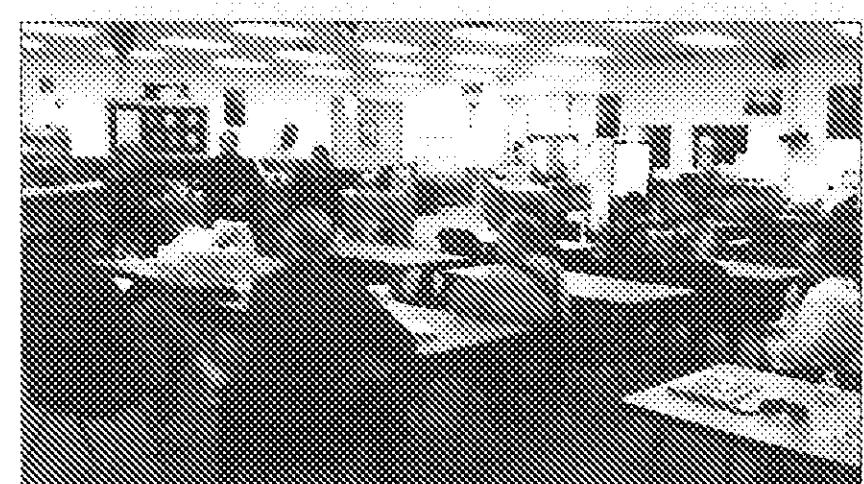
Education Town Hall held in Senate District 5

Public education was the topic for the town hall meeting held on Saturday, April 13 at Silvestri Middle School for those residing and teaching within Senate District 5 boundaries.

Senate Education Committee Chair Joyce Woodhouse (SD5), along with Assemblyman Dr. Andy Eisen (AD21), and Assemblywoman Lesley E. Cohen (AD29) held this meeting to hear from educators about the issues they are grappling with and possible ways to improve our schools and our students' academic achievement.

Teachers in attendance spoke of the challenges and the need to create a stable revenue source of funding so that we can provide our students with the best learning opportunities.

Legislators thanked them taking the time to provide their valuable and candid feedback.



NEXT UP: We are working with CCSD on a plan to reduce class size in our schools.
Plan to be released this week. Stay tuned!

Bills to Watch...

April 12, 2013 marked the first deadline for legislative bills. Those bills introduced by committees had to be heard by the originating committee by the end of the day, or those bills would die. (It is important to keep in mind that while a bill may have died through this process, it can always be added to a bill as an amendment, so we must remain watchful.) Below is a list of some of the bills to be watched: some good; some bad. You can read each bill by going to our website and looking up each one at: bit.ly/CCEABillTracking

Class Size

- AB 162 – Revises provisions governing class-size reduction. (S) *This bill is now before Committee on Ways & Means.*
SB 481 – Extends the temporary waiver from certain minimum expenditure requirements for textbooks for school districts and the temporary allowance for an increase in class sizes for grades 1-3. (O) *This bill is now before the Committee on Finance.*

Charter Schools

- AB 205 – Revises provisions governing charter schools. (O) *This bill is now before the Committee on Education.*
SB 59 – Eliminates a restriction on times during which a charter school may use school buildings owned by a school district. (O) *This bill passed and has been moved before the Assembly.*
SB 384 – Revises provisions relating to charter schools. *This bill is now before the Committee on Education.*
SB 443 – Revises provisions governing charter schools. (M) *This bill is now before the Assembly Committee on Education.*
SB 471 – Revises provisions relating to the Account for Charter Schools. *This bill is before the Committee on Finance.*

ELL

- AB 272 – Revises provisions governing education. *This bill is now before the Committee on Education.*
AB 328 – Revises the calculation of the basic support guarantee for school districts to include an additional percentage for pupils who are limited English proficient. (S) *This bill is now before Committee on Ways & Means.*
SB 291 – Requires the board of trustees of certain school districts to establish a prekindergarten program to teach children who are limited English proficient. (S) *This bill is now before Committee on Finance.*
SB 455 – Establishes a pilot program for school districts to establish or expand programs for children who are English language learners. (O) *This bill is now before Committee on Finance.*
SB 504 – Revises provisions for the education of ELL students and qualifications for teachers to teach ELL students. *This bill is now before the Committee on Education.*

RECESS

- AB 376 – Authorizes the reimbursement of teachers for out-of-pocket expenses. (S) *This bill is now before the Committee on Ways & Means.*
SB 240 – Authorizes the reimbursement of teachers for out-of-pocket expenses. (S) *This bill is now before the Committee on Finance.*

Pre-K- All Day K

- AB 163 – Provides for early childhood prekindergarten education programs. (S) *This bill is now before the Committee on Education.*
SB 182 – Expands full-day kindergarten in public schools. *This bill is now before the Committee on Education.*

Ending Social Promotion

- AB 161 – Revises provisions governing the advancement of certain pupils to higher grade levels. (S) *This bill is now before the Committee on Education.*
AB 164 – Revises provisions governing education. (M) *Pursuant to Joint Standing Rule No. 14.3.1, no further action allowed.*

Evaluations

- SB 193 – Revises provisions governing reductions in the workforce of school districts. (O) *Pursuant to Joint Standing Rule No. 14.3.1, no further action allowed.*
SB 386 – Revises provisions governing educational personnel. (O) *Pursuant to Joint Standing Rule No. 14.3.1, no further action allowed.*
SB 407 – Revises provisions governing the statewide performance evaluation system for teachers and administrators. (S/with amendment) *This bill is now before the Committee on Education.*

Empowerment

- AB 458 – Revises provisions governing empowerment schools. (S) *Pursuant to Joint Standing Rule No. 14.3.1, no further action allowed.*
SB 290 – Revises provisions governing empowerment schools. (S) *Pursuant to Joint Standing Rule No. 14.3.1, no further action allowed.*
SB 311 – Revises provisions governing empowerment schools. (S) *This bill is now before the Committee on Education.*

Collective Bargaining

- AB 112 – Makes various changes relating to collective bargaining agreements of local government employers. (O) *Pursuant to Joint Standing Rule No. 14.3.1, no further action allowed.*
SB 439 – Revises provisions relating to collective bargaining agreements of local government employers. (O) *Pursuant to Joint Standing Rule No. 14.3.1, no further action allowed.*

Vouchers

- SJR 10 – Proposes to amend the Nevada Constitution to allow voucher schools. (O) *Pursuant to Joint Standing Rule No. 14.3.1, no further action allowed.*

cjcl@npri.org

From: Victor Joecks
Sent: Wednesday, May 29, 2013 10:13 AM
To: cjcl@npri.org
Subject: FW: Class Size Reduction Proposal
Attachments: CSR4-YrPlanSummaryfinal.pdf; ATT00001.htm

A recipient of the email below who would prefer to remain anonymous forwarded this email to me. The content indicates that the Clark County School District email list is being used by a school district employee himself to promote education-related political activity.

Sincerely,

Victor Joecks
Communications Director, Nevada Policy Research Institute
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Like us on Facebook or follow us on Twitter [@NevadaPolicyRI](#)

From: "Karl T. Byrd" <KTB532@interact.ccsd.net>
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Subject: Class Size Reduction Proposal

Dear Staff,

attached is the a summary of the CCEA and school district plan to end overcrowded classrooms in our schools. As we prepare for the April 27, 2013 Education Town Hall Meeting the information in the attachment will help with greater clarification of the class size reduction issue and the four year proposal listed.

If you plan to join us for the 90 minute session Saturday reply to this email ASAP and I will reserve you a spot.

Thank you very much for support with the blue postcards and I look forward to seeing everyone on Saturday.

Together in solidarity,

Yours Truly,

Karl J. Byrd

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" Human progress is neither automatic nor inevitable. . . Every step towards the goal of justice requires sacrifice, suffering, and struggle; the tireless exertions and passionate concerns of dedicated individuals".

Martin Luther King Jr.



the union
of teaching
professionals

CCEA and School District present plan to end overcrowded classrooms in our schools

Four-year plan provides a smart, systematic approach with achievable results

On Tuesday, April 23, 2013, the Clark County Education Association and the Clark County School District held a joint press conference at Cashman Middle School to present a four-year plan to reduce class size and put an end to overcrowded classrooms in Clark County's schools. This class size reduction plan calls for hiring 4,116 additional teachers and the addition of 3,430 classrooms to bring class sizes in line with the nation's best school districts. This plan is concrete, smart, and achievable. It puts teachers, parents, and administrators on the same side — working to provide our students with the best learning environment so they may thrive and achieve academic success.

Why we do need this plan? For too long Nevada has abandoned the plan adopted during the 1989 Legislative Session to reduce class sizes in K-12. The effect of class size reduction is not rhetoric and our legislators have known this fact for over 20 years. States committed to investing in education have made smaller student-to-teacher ratios a cornerstone of higher student achievement and school reform. This is no coincidence, there is a direct correlation. Smaller class sizes allow time for teachers to differentiate instruction, meet the unique needs of every student, and provide a safe learning environment. On the other hand, overcrowded classrooms rob teachers of valuable instructional time and our students of learning opportunities they won't get back.

We cannot wait for the legislature to develop a plan, so we are taking the lead by charting the course. This is how it would work:

- Year 1: Calls for hiring of 835 teachers and the construction of 696 new classrooms (the equivalent of about five new schools) to bring our average class sizes down by 2-3 students at most grade levels. Teacher cost for year 1 = \$55 million.
- Year 2: Building on our progress from year one, we would hire an additional 1,100 teachers and build 917 new classrooms (the equivalent of 11 new schools), bringing average class sizes down by an additional 1-2 students at most grade levels. Teacher cost for year 2 = \$72.6 million.
- Year 3: Building on our progress from year two, we would hire 1,100 more teachers and build 922 new classrooms (the equivalent of 10 new schools), bringing average class sizes down an additional 1-2 students at most grade levels. Teacher cost for year 3 = \$73 million.
- Year 4: During the final year of this plan, we would hire 1,100 new teachers and build 895 new classrooms (the equivalent of 9 new schools), bringing class sizes down and average of 1-2 students at most grade levels. Teacher cost for year 4 = \$71 million.

(Note: 'Equivalent of' is used because some of the additional classrooms could be additions to existing schools.)

Under this scenario, after four years our class sizes would be:

Grade	Current Ratio	New Ratio
K	26 students	16 students
1-2	19 students	16 students
3	22 students	19 students
4-5	34 students	26 students
6-12	38 students	30 students

Simply put, if the plan is acted upon and funded during the 2013 Legislative Session, it will place 1,935 additional teachers in the classroom and reduce class size in over 1,700 classrooms by an average of 3-5 students (in most grades) within the first two years ~ this at a teacher cost of \$128 million.

Years 3 and 4 of the plan would result in the hiring of 2,180 additional teachers and a teacher cost of \$144 million.

This plan is the first step to implement class size reduction in all grade levels and, if given a chance, will put an end to overcrowded classrooms in our schools.

Our Call to Action: Nevada legislators must stop gambling with our students' future and fund education at adequate levels to provide our students with the best learning environment and you, our teaching professionals, with the tools & resources that help you deliver excellent teaching.

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From: Victor Joecks
Sent: Wednesday, May 29, 2013 10:13 AM
To: cjcl@npri.org
Subject: FW: Teacher Big Five School Board Meeting Notice
Attachments: 20thSchoolBoardMeetingNotice.pdf; ATT00001.htm

A recipient of the email below who would prefer to remain anonymous forwarded this email to me. The content indicates that the Clark County School District email list is being used by a school district employee himself to promote education-related political activity.

Sincerely,

Victor Joecks
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Subject: Teacher Big Five School Board Meeting Notice

Hello Everyone,

I am writing to remind people of the very important School Board Meeting taking place on Monday, May 20th at the Edward Greer Building on E. Flamingo. This special meeting is being called to determine if the district will expend limited resources to search for Superintendent candidates. CCEA is looking to show up and speak against spending valuable money at a time that the district is struggling.

Please find an attached flyer inviting you and your colleagues to join us on Monday, May 20th at 5:30pm. As the recognized building leaders, I am hoping you can share this information with everyone on your staff.

Thank you so much for all that you do. I hope to see you on the 20th.

Jahvel Manyvong

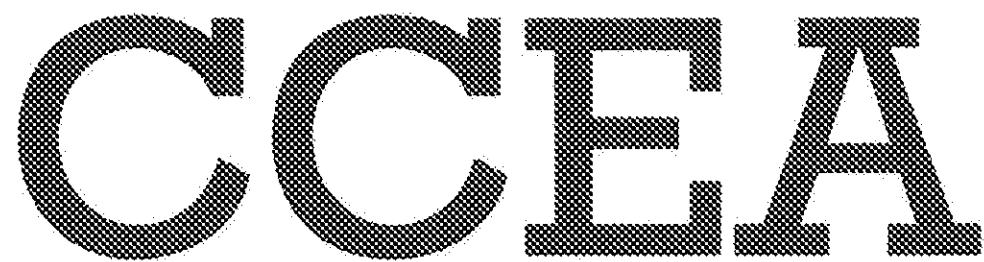
Member Rights Specialist

Clark County Education Association

4230 McLeod Drive

Las Vegas, NV 89121

Fiscally Responsible Superintendent Search!



Clark County Education Association

the Union
of teaching
professionals

WHAT? Attend to show support for a fiscally responsible superintendent search.

Why? Teachers recently took a pay cut, the board should show fiscal restraint when considering a new superintendent.

When? May 20th, 5:30pm,

Edward Greer Education Center.

2832 E. Flamingo Rd., Las Vegas, NV 89121

Who? All Teachers; Members and Nonmembers (This impacts us all!)