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STATE OF ARIZONA
MARICOPA COUNTY SUPERIOR COURT

JEREMY THACKER, Plaintiff Pro Se, v. CITY OF PHOENIX, a municipal corporation, Defendant.	CASE NO. CV2025-026278 MOTION FOR ORDER TO SHOW CAUSE (Assigned to the Honorable Scott Minder)
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INTRODUCTION

Plaintiff Jeremy Thacker respectfully moves this Court for an Order to Show Cause requiring Defendant City of Phoenix to justify its conduct surrounding two executive sessions held on January 28 and February 11, 2025. These executive sessions were convened under highly questionable circumstances that Plaintiff alleges violated Arizona's Open Meeting Law ("OML"), A.R.S. § 38-431 et seq. In particular, the City's actions:

1. Employed an **impermissibly vague agenda description** (“Community Citizen Comment”) for an executive session item, providing no meaningful notice of the matter to be discussed;
2. Relied on a **blanket pre-approval of executive sessions** (voted on in November 2024 to cover multiple 2025 dates) instead of holding a separate public vote immediately before each executive session;
3. **Misused executive session** for discussions that do not fall within any statutory exception, thereby conducting public business in secret; and
4. **Failed to return to public session** for any necessary deliberation or decision, effectively taking legal action behind closed doors.

Each of the above practices frustrates the purpose of Arizona’s open-government laws. The OML exists “to avoid decision-making in secret” and to “promote accountability by encouraging public officials to act responsively and responsibly”. See *Open Meeting Law 101*, Ombudsman–Citizens’ Aide, at 1 (rev. Jan. 2023). It is “the public policy of this state that meetings of public bodies be conducted openly and that notices and agendas be provided...which contain such information as is reasonably necessary to inform the public of the matters to be discussed or decided.” A.R.S. § 38-431.09(A). Arizona courts have likewise recognized that the OML was enacted to “open the conduct of the business of government to the scrutiny of the public” and to “ban decision-making in secret.” *Karol v. Bd. of Educ. Trs.*, 122 Ariz. 95, 97, 593 P.2d 649, 651 (1979) . Consistent with that aim, the Arizona Attorney General has cautioned that any uncertainty in the OML’s application should be resolved in favor of openness. The City’s conduct subverts these principles. Through vague agenda wording and procedural maneuvering, the City has effectively shielded its discussions from public view, undermining the fundamental right of the public to attend, monitor, and scrutinize its

government's deliberations. Plaintiff, as a concerned citizen, has been forced to initiate this statutory special action to preserve the public's right to know—at significant personal financial and legal risk—because the City's opacity leaves no other recourse.

Accordingly, Plaintiff asks that the Court issue an Order (1) directing the City to show cause why its January 28 and February 11, 2025 executive sessions did not violate the OML, (2) requiring the City to produce the minutes and any related records from those sessions for in-camera review, (3) enjoining the City from destroying or concealing any such records, and (4) setting a prompt hearing to determine appropriate further relief. As discussed below, the Court's intervention is necessary and justified, particularly given that OML enforcement is a statutory special action with no pretrial discovery—meaning in-camera inspection is the only effective means to ascertain what occurred behind closed doors and to evaluate the legality of the City's actions.

BACKGROUND

Executive Sessions in Question: On January 28, 2025, and again on February 11, 2025, the Phoenix City Council convened in executive session to discuss an agenda item labeled “Community Citizen Comment.” According to the agendas, each of those executive sessions was noticed as a “discussion and consultation for legal advice” regarding “Community Citizen Comment.” In other words, the City cloaked the subject of these meetings under a generic label, implying only that an attorney would provide unspecified legal advice on some “Community Citizen Comment.” This description is extraordinarily opaque—it reveals nothing about the actual topic or issue under discussion, nor even the identity or nature of the “comment” at issue.

Blanket Pre-Approval of Executive Sessions: Compounding the concern, the City Council did not hold a fresh public vote on January 28 or February 11 to enter those executive sessions. Instead, the City had previously given a blanket approval for a set of executive session

dates for the entire year. Specifically, on November 13, 2024, the outgoing Council voted in a formal meeting to “pre-authorize” numerous executive sessions to be held throughout 2025, including sessions on January 28 and February 11, 2025, among others. No specific topics or purposes were identified for each future session at the time of that blanket vote. As a result, when the new Council convened in 2025 (with at least one new member not present for the 2024 approval), the City simply proceeded with the pre-scheduled executive sessions without a contemporaneous public vote tailored to the actual subject matter of each meeting. Council members who were newly seated had no opportunity to publicly deliberate or approve the closed meetings they were now asked to attend, and the public had no chance to witness or participate in any decision to go into those executive sessions. This procedure bypassed a crucial safeguard of the OML—the requirement that the decision to hold an executive session be made openly, on the spot, and in reference to a disclosed topic.

Plaintiff’s Public Records Request and the City’s Response: In an effort to find out what had occurred during these shadowy meetings, Plaintiff submitted a Public Records Request (“PRR”) on May 19, 2025. He specifically requested any records related to the January 28, 2025 Executive Session Agenda Item #7 and the February 11, 2025 Executive Session Agenda Item #4—both of which were the cryptically described “Community Citizen Comment” sessions. The City’s response, dated July 9, 2025, was telling. The City stated: “The City has reviewed its files and has determined there are no responsive documents to your request except for those protected under attorney client privilege or work product privilege.” (Ex. E). In other words, the City claimed that aside from records it unilaterally deemed privileged, it possessed no documents whatsoever concerning those agenda items. The City provided no privilege log, no clarification, and cited no specific statutory exemption for withholding any materials—only a blanket invocation of attorney-client or work-product privilege. This response deepened rather than

dispelled the confusion. It strongly suggests that any records which do exist (such as minutes, notes, or communications) are being withheld under a claim of privilege, yet the City refuses to even confirm what kinds of records are being withheld or the general subject discussed.

Plaintiff, through counsel, sent a follow-up demand letter on July 11, 2025, detailing the legal deficiencies of the City's response under Arizona's public records law (A.R.S. § 39-121 et seq.)—including the lack of any specific justification or privilege log. The letter also reiterated that the agenda description “Community Citizen Comment” was impermissibly vague and that the City's obfuscation was undermining the very accountability that both the Public Records Law and the OML are meant to ensure. The City, however, maintained its refusal to provide any additional information or records. Consequently, Plaintiff did not include a separate public-records claim in his lawsuit at this time, because the City's conduct has thwarted Plaintiff's ability even to identify what records exist or what exactly was discussed. This Catch-22 scenario—where the City's secrecy makes it nearly impossible to plead a public-records violation without access to the very records being hidden—further illustrates why court intervention is necessary. The City should not be allowed to create an impenetrable “black box” around its executive sessions, insulating itself from scrutiny by using broad privilege claims and vague notices to keep both the public and the courts in the dark.

Procedural Posture: Plaintiff's First Amended Complaint (filed as a statutory special action under A.R.S. § 38-431.07) asserts the above OML violations and seeks relief including declaratory/injunctive relief and civil penalties. Because this is a special action enforcement of the OML, there is no opportunity for ordinary discovery—the case must largely be decided on the facts as they can be determined from the public record or through court review of confidential materials. Plaintiff now brings this Motion for an Order to Show Cause to promptly address the gravest issue at hand: whether the City violated the OML in connection with the

January 28 and February 11 executive sessions, and whether the Court should examine the executive session minutes and related records in camera to make that determination. For the reasons that follow, Plaintiff submits that such review is both authorized by law and essential to achieving a just outcome in this matter.

LEGAL ARGUMENT

1. Vague Executive Session Agenda Items Violate the Open Meeting Law’s Notice Requirements

The City’s use of the agenda description “Community Citizen Comment” for an executive session item violated the OML’s mandate that meeting notices and agendas inform the public of what will be discussed. Even for executive sessions (which by their nature involve some confidentiality), the law requires the agenda to include a “general description of the matters to be considered.” A.R.S. § 38-431.02(I). This description must amount to more than a mere recitation of the statutory authorization—it must give the public some meaningful clue as to the topic, without divulging so much detail that it defeats the purpose of the closed session. In other words, an executive session agenda can be phrased generally, but not so generically that it says nothing at all. Arizona’s public policy is that agendas contain enough information “as is reasonably necessary to inform the public of the matters to be discussed or decided.” Accordingly, generic labels like “personnel,” “new business,” or “other matters” have been deemed insufficient—the specific matter must be separately identified. *Thurston v. City of Phoenix*, 157 Ariz. 343, 344, 757 P.2d 619, 620 (App. 1988). The Arizona Agency Handbook on open meetings similarly cautions that such generic descriptions fail to meet OML requirements unless the specific subject is also identified. Indeed, as early as 1978, the Attorney General opined that a meeting can hardly be considered “open” if the public is not informed of the

“subject matter ... to be considered” , effectively reading a subject-matter notice requirement into the law.

Here, the agenda label “Community Citizen Comment” was effectively meaningless to any member of the public. It is not an authorized statutory category, nor does it describe any particular subject. It could conceivably refer to anything a citizen might comment on. Such opacity fails to “apprise the public of the matters to be discussed” as required by law. Even if the City believed it had some legitimate need for confidentiality, the OML does not permit the agency to hide behind a phrase so vague that the public is completely in the dark. “Community Citizen Comment” is no more informative than labeling the item “discussion of a thing” or “someone in Phoenix’s words”—it entirely defeats the purpose of having an agenda. If such vagueness were allowed, the statutory agenda requirement would be rendered pointless, and public bodies could routinely conduct secret meetings with only the most cursory of hints to the public. This is precisely what the OML’s notice provisions are designed to prevent.

Notably, the City attempted to justify the closed sessions by indicating they were for “legal advice.” Arizona law *does* allow executive sessions for obtaining legal advice from the public body’s attorneys. See A.R.S. § 38-431.03(A)(3). However, labeling an item as “consultation for legal advice” does not exempt the public body from providing a coherent description of the subject matter. The OML explicitly says the agenda should provide more than just a recital of the statutory provision authorizing the executive session. In this case, the City did little more than recite the magic words (“consultation for legal advice”) and append an inscrutable title (“Community Citizen Comment”). That is not an adequate general description by any stretch. If the legal advice pertained to a specific pending issue or dispute, the agenda needed to allude to that in general terms (for example, “legal advice regarding [subject]”). By failing to do so, the City violated § 38-431.02 and deprived the public of fair notice that, for

instance, the Council might be discussing a particular lawsuit, contract, policy, or other identifiable matter.

2. The City’s “Blanket” Pre-Approval of Future Executive Sessions Subverted the Required Public Vote for Each Executive Session

The Open Meeting Law requires that any executive session must be preceded by a public majority vote of the governing body, taken at a meeting convened in compliance with the OML. In fact, the statute is clear on this point: “Upon a public majority vote of the members constituting a quorum, a public body may hold an executive session but only for the following purposes...”. In practice, this means that at the time a public body wishes to go into an executive session, it must first convene in an open meeting, announce the specific reason (statutory subsection) for the executive session, and then hold a majority vote to approve closing the meeting for that purpose. (For example, the Arizona Agency Handbook instructs that the public body’s vote to enter executive session should occur immediately beforehand, and that the motion state the specific reason so the public can understand why the meeting is being closed.) The law confines executive sessions to certain narrow topics (e.g. legal advice, litigation strategy, certain personnel matters, etc.) and each session must be justified and authorized on its own merits, in real time. A public body cannot evade this requirement by voting once to approve a whole series of future executive sessions en masse. Yet that is exactly what the City attempted to do with its November 13, 2024 blanket pre-approval of all 2025 executive session dates.

By treating the decision to hold executive sessions as a one-time administrative formality, the City bypassed the critical, contemporaneous public vote that should occur for each meeting. The blanket vote in November 2024 did not (and could not) specify the “specific matters” to be discussed in each future executive session—indeed, those matters were unknown at the time. Thus, when January 28, 2025 arrived, the Council entered a closed session without engaging in

any public discussion or decision at that moment about why a closed session was necessary or permissible. The new Council simply inherited a pre-scheduled secret meeting. This procedure violated the spirit and letter of A.R.S. § 38-431.03. The statute envisions a dynamic process where the public body weighs the need for confidentiality against the public’s right to observe, on an instance-by-instance basis. See *Desert Mountain Energy Corp. v. City of Flagstaff*, 2025 WL 3428866, ¶22 (Ariz. Ct. App. June 6, 2025). By contrast, the City’s blanket pre-approval foreclosed any such real-time deliberation and public input. It “transforms a specific, situation-dependent decision (to go into executive session for a particular reason) into a bureaucratic formality” (First Am. Compl. ¶25), stripping away the transparency the OML is meant to ensure in the decision to enter a closed meeting.

The harm from this tactic is not merely theoretical. As noted, one council member (who joined the Council in April 2025) had no say in the blanket authorization but was nonetheless expected to partake in executive sessions that never received a fresh public vote once she was in office. Likewise, the public in January and February 2025 had no opportunity to observe their elected representatives make (or question) the decision to exclude the public from those meetings—the decision had been made months earlier by a different council makeup. This is precisely the kind of “secret decision-making” the OML is designed to prevent. The law requires openness not only in final decisions but in the deliberative process leading to those decisions, including the decision to close a meeting. See Ariz. Att’y Gen. Op. No. 75-8, at 2 (Aug. 29, 1975) . The City’s blanket approval scheme short-circuited that process and is incompatible with the OML’s requirements.

3. The City Improperly Used Executive Session to Discuss Matters Outside the Scope of Any Statutory Exception

Even if the procedural faults above were set aside, the content of the January 28 and February 11 executive sessions appears to have exceeded what the law allows to be discussed in secret. Arizona law strictly limits executive sessions to a closed discussion of specific topics enumerated in A.R.S. § 38-431.03(A). These exceptions (such as legal advice, pending litigation, personnel matters, etc.) are narrowly construed in order to protect the public’s strong interest in open government. See *Desert Mountain Energy*, ¶22. Courts have emphasized that the balance tips in favor of openness—any uncertainty about whether a topic may be discussed in executive session should be resolved “in favor of requiring public meetings.” In practical terms, a public body cannot lawfully use an executive session as a free-ranging forum to hear complaints, gather general input from citizens, or debate policy outside of public view. If a conversation strays beyond the tight confines of a permitted topic (for example, if it shifts from legal advice into policy decisions or strategy choices), the discussion must be brought into public session. *Id.* ¶25.

In the present case, the label “Community Citizen Comment” strongly suggests that the executive sessions were convened to hear or discuss a comment or complaint from a member of the public (or about a member of the public). There is no exception in the OML that allows a general citizen communication to be discussed in executive session. Only certain subject matters qualify—e.g., discussing legal advice with the city attorney, discussing a specific personnel issue, instructing negotiators in contract or real estate negotiations, etc. A nebulous “comment” from a citizen does not fit any of those categories on its face. If the City’s intention was to receive legal advice about some citizen’s complaint, then the role of the executive session should have been limited to the attorney’s legal counsel only. The moment the discussion ventured beyond the attorney’s legal analysis—for instance, if Council members or staff started debating how to respond to the citizen’s issue, what action to take, or the merits of the

complaint—then the meeting would have crossed into deliberation that must occur openly. See *Desert Mountain*, ¶21. The Arizona Court of Appeals has made this clear: when an executive session is used to obtain legal advice, the public body cannot go further and make decisions or commitments based on that advice behind closed doors. “Once the members of the public body commence any discussion regarding what action to take based upon the attorney’s advice, the discussion moves beyond the realm of legal advice and must be open to the public.” *City of Prescott v. Town of Chino Valley*, 166 Ariz. 480, 485 (App. 1990).

Without the executive session minutes or other records (which the City refuses to disclose), Plaintiff cannot know for certain what was discussed. However, the City’s aggressive efforts to shield everything under attorney-client privilege raise a red flag. It suggests that the City may be characterizing the entire content of those meetings as “legal advice” even if substantive discussions or decisions took place. The Court should not simply take the City’s word for it. Given the minimal agenda description and the lack of subsequent public action, there is a significant possibility that these executive sessions were misused to discuss policy or take direction on a matter that should have been addressed in public. If so, the City exceeded the lawful scope of executive session and violated the OML’s core command that “all legal action of public bodies shall occur during a public meeting.” (§ 38-431.01(A)).

4. The Council’s Failure to Reconvene in Public to Deliberate or Take Action Indicates OML Violations

After both the January 28 and February 11 executive sessions, the City Council never reconvened in an open meeting to discuss or decide upon the subject that had been considered in the closed session. In fact, to Plaintiff’s knowledge, no public mention or motion was made regarding any “Community Citizen Comment” item following those executive sessions. This is troubling because it suggests one of two scenarios: (a) either the Council made some decision or

reached a consensus during the executive session (which would be illegal), or (b) the Council effectively took no action at all, leaving the matter entirely unresolved in the public record (which, if action was required, would also violate the OML). Under Arizona law, no legal action—meaning “a collective decision, commitment or promise” by the Council—can be taken in an executive session. Any final vote or binding decision must be made publicly. The statutes specifically provide that “[a] public vote shall be taken before any legal action binds the public body.” The only narrow exception is that a public body may privately give direction or instruction to its attorneys or negotiators in certain situations (e.g., regarding pending litigation or negotiations)—but even then, the final decision (for example, to settle a case or to enter a contract) must be ratified in public once it is ripe. *See Desert Mountain*, ¶24.

In this case, if the Council’s discussion in executive session required any follow-up decision (such as directing staff to take some action, authorizing a response to the citizen issue, or even deciding that no action will be taken), that itself constitutes “legal action” or at least deliberation that should have occurred openly. The absence of any public vote or discussion afterward is a strong indicator that the Council’s will was carried out entirely in the shadows. At a minimum, the Council appears to have treated the matter as concluded by the end of the executive session, with no transparency to the public about the outcome. This scenario contravenes the OML. The law is designed to prevent public bodies from “rubber-stamping” decisions already made in closed meetings, or worse, never publicizing decisions at all. By failing to return to open session and make any record of a decision (if one was made), the City kept the public completely unaware of its governance activities on that issue.

It bears emphasizing that allowing such a practice would severely undermine public trust. The OML declares that “all meetings of any public body shall be public meetings” and that deliberations as well as final decisions must be public (except in the limited exec-session

contexts). The requirement to reconvene and vote publicly is not a mere technicality; it is fundamental to governmental accountability. Here, the lack of any public proceedings following the secret sessions strongly implies an OML violation—either through an improper secret decision or through the improper handling of a matter entirely behind closed doors without requisite public deliberation. Either way, the Court should require the City to explain this failure. If the City contends that “no action” was taken in executive session (and thus none needed to be taken publicly), the in-camera review of the minutes will allow the Court to verify whether that is true or if, on the contrary, a collective decision or commitment was in fact made during the closed meeting.

5. Court Intervention is Warranted: The City’s Secrecy Frustrates Accountability and Only In-Camera Review Can Reveal the Truth

The pattern of conduct by the City—vague agendas, a pre-authorized secret meeting, and a blanket public-records denial—has thwarted the normal mechanisms that ensure government accountability. The enforcement provisions of the OML anticipate exactly this kind of situation. The statute expressly provides that “Any person affected by an alleged violation” of the OML may sue to require compliance, and it grants the superior court broad authority to remedy violations, including ordering an in-camera review of executive session minutes. Specifically, A.R.S. § 38-431.07(C) states that in an action challenging an executive session, “the court may review in camera the minutes of the executive session, and if the court in its discretion determines that the minutes are relevant and that justice so demands, the court may disclose [them] to the parties or admit [them] in evidence, in whole or part.” That is precisely the relief Plaintiff seeks here. Given that this is a statutory special action (see § 38-431.07(A)) which does not allow for ordinary discovery, the only effective way to ascertain what transpired during the January 28 and February 11 executive sessions is for the Court to examine the confidential

minutes and any related materials in camera. If those minutes confirm the violations alleged—for example, that non-permissible topics were discussed or decisions were made—then the Court can take appropriate action, such as declaring any such decisions null and void (§ 38-431.05(A)), enjoining further violations, and imposing any applicable civil penalties or attorney fees (§ 38-431.07(A)). If the minutes instead show full compliance with the law, then no improper disclosure will have been made (as the review was private) and the City will have the benefit of an independent confirmation of its compliance.

At present, Plaintiff cannot determine the full extent of the OML violations or evaluate potential public-records claims because the City has cloaked everything in secrecy. This is not how Arizona’s open-government laws are intended to function. The public records law presumes broad access to government records, and the OML is to be “construed in favor of open and public meetings.” Yet the City’s approach—refusing to produce any records or even log them, and offering only a token agenda description—flips that presumption on its head, constraining the public’s right to know unless and until a court forces transparency. Plaintiff, in seeking to vindicate the public interest, should not have to proceed blindfolded. Nor should the City be allowed to benefit from its own lack of transparency by arguing that Plaintiff “lacks evidence” of what was discussed; the lack of evidence is a direct result of the City’s actions. In such circumstances, courts have recognized that in-camera inspection is an appropriate tool to balance the need for confidentiality with the need for accountability.

Put simply, justice demands an in-camera review here. The Court’s examination of the executive session minutes (and any other withheld documents, such as communications or presentations from those sessions) will either substantiate Plaintiff’s claims or refute them—but either outcome serves the public interest in ensuring the OML is enforced. Conversely, denying in-camera review would reward the City’s strategy of secrecy and leave a cloud of uncertainty

over whether the law was violated. This Court is the only avenue through which the truth can be discovered, given that the usual avenues (public minutes, public records, etc.) have been blocked. Plaintiff has made a prima facie showing of multiple OML irregularities. The City should now be required to show cause why its conduct did not violate the law, with the executive session materials made available to the Court for a confidential inspection. This procedure will not unduly harm any legitimate privilege or confidentiality interest of the City; the records will remain sealed unless the Court finds a compelling reason to disclose portions relevant to an OML violation. On the other hand, granting this relief will uphold the OML's mandate that government business be conducted as openly as possible and that exceptions be narrowly interpreted to prevent abuse.

Finally, Plaintiff requests a protective order to ensure no records are lost or destroyed during the pendency of this dispute. Given the seriousness of the allegations, the City should be formally enjoined from purging any emails, notes, texts, or other materials related to the January 28 and February 11 executive sessions or the "Community Citizen Comment" agenda item. This preservation order will safeguard the integrity of the Court's review and any further proceedings.

REQUESTED RELIEF

For the foregoing reasons, Plaintiff respectfully requests that the Court grant this Motion and issue an Order to Show Cause with the following provisions:

- A. **In-Camera Review:** Direct the City to produce to the Court, for in-camera inspection, the complete minutes (and/or recording, if any) of the City Council executive sessions held on January 28, 2025 and February 11, 2025, along with any other documents responsive to Plaintiff's public records request that were withheld under claims of privilege. This will allow the Court to review the actual content of the meetings and

determine whether they were lawfully held within the OML's exceptions or whether violations occurred.

- B. Order to Show Cause Hearing:** Order Defendant City of Phoenix to appear and show cause why the January 28, 2025 and February 11, 2025 executive sessions (and the actions related thereto) did not violate Arizona's Open Meeting Law. The Order should set a Show Cause hearing at the earliest convenient date for the Court, so that any factual disputes can be addressed and further relief considered expeditiously. At that hearing, the Court can make findings based on the in-camera materials and the parties' arguments, and decide on appropriate remedies.
- C. Preservation of Records:** Pending the hearing and the Court's review, enjoin the City and its officials from destroying, altering, or withholding (beyond claiming privilege to the Court) any records relating to the agenda items or discussions in question. This includes, but is not limited to, the executive session minutes, notes taken by any participants, communications or memoranda related to those sessions or the "Community Citizen Comment" topic, and any calendar entries or recordings. An order preserving the status quo will ensure that all relevant evidence remains available to the Court.
- D. Further Relief:** Provide that, following the Show Cause hearing, the Court will make such orders as appropriate under A.R.S. § 38-431.07(A). Such relief may include declaring any decisions made in violation of the OML to be null and void, awarding Plaintiff his costs and attorney's fees, imposing civil penalties on any individuals found responsible for intentional violations, and/or injunctive relief to prevent future violations. By addressing the issue through an OSC and in-camera review now, the Court will be in a position to grant full relief in accordance with the OML's enforcement provisions once the facts are ascertained.

Plaintiff submits that this course of action is both necessary and supported by law. The OML explicitly contemplates court involvement to vindicate the public’s right to open government, even when documents are confidential. Indeed, the statute directs that the OML “shall be liberally construed in favor of open and public meetings.” Plaintiff asks this Court to so construe it, and to issue the requested orders to shine light on what has, so far, been improperly kept in the shadows.

PRESERVATION OF ADDITIONAL ISSUES

Plaintiff acknowledges that the City’s response to his public records request—stating that all responsive documents were protected by attorney-client privilege or the work product doctrine—is currently untested and may involve overlapping factual issues with the challenged executive sessions. Plaintiff therefore expressly reserves the right to seek further declaratory or injunctive relief under A.R.S. §§ 39-121 et seq., including a challenge to the City’s withholding of documents, should subsequent evidence demonstrate that such records were improperly classified as privileged.

Respectfully submitted on this 9th day of September, 2025,

By: /s/Jeremy Thacker
Jeremy Thacker
Plaintiff Pro Se