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Special Investigation

INTRODUCTION

The Office of Inspector General (OIG) is committed to promoting integrity, accountability, transparency, and public confidence in the operations of the City of Albuquerque. Consistent with its authority under the Inspector General Ordinance, the OIG conducts independent reviews and investigations into allegations of misconduct, waste, fraud, abuse, and violations of law, policy, or ethical standards involving City officials and employees.

On December 23, 2025, the OIG received a joint request from Samantha Sengel, Chief Administrative Officer for the City of Albuquerque (on behalf of the Mayor), and Albuquerque City Councilor Brook Bassan, who was serving as City Council President at the time of the request, to retain an independent attorney and conduct an independent investigation into allegations involving the City Attorney and the Office of the City Attorney. Because the allegations involved the City Attorney and her office, the OIG determined that retaining outside legal counsel was appropriate to ensure the investigation was conducted objectively, without the appearance of a conflict of interest, and with the highest degree of independence.

Following an extensive search, the OIG retained the law firm of Jennings Haug Keleher McLeod Waterfall LLP to conduct the investigation on behalf of the OIG. The firm was tasked with independently reviewing the allegations, gathering and evaluating relevant evidence, conducting interviews, and preparing a comprehensive investigative report containing its factual findings, analysis, and conclusions.

The attached report reflects the investigative work performed by Jennings Haug Keleher McLeod Waterfall LLP. The OIG is issuing this report as the official investigative report of the Office of Inspector General. The OIG accepts and adopts the report's findings and conclusions as the official investigative findings of the Office of Inspector General and issues the recommendation set forth below in furtherance of its mission to promote effective, transparent, and accountable municipal government.

Recommendation

Although the investigation did not identify any violation of law, City ordinance, policy, or the Rules of Professional Conduct, the investigation highlighted a potential misunderstanding regarding the roles and responsibilities of the Office of the City Attorney. The Office of Inspector General recommends that the Office of the City Attorney consider developing and periodically providing informational guidance or training to City officials regarding the role of the City Attorney, attorney-client relationships within municipal government, and the Rules of Professional

Conduct governing conflicts of interest. Increased awareness of these responsibilities may provide greater clarity regarding the City Attorney's ethical obligations and professional responsibilities.

The OIG appreciates the cooperation of all individuals who participated in this investigation and acknowledges the professionalism exhibited throughout the investigative process.



PETER PACHECO
INTERIM INSPECTOR GENERAL
OFFICE OF INSPECTOR GENERAL

July 31, 2026
Date of Issuance

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**CONFIDENTIAL & PRIVILEGED:
ATTORNEY CLIENT COMMUNICATION & ATTORNEY WORK PRODUCT¹**

June 29, 2026

To: City of Albuquerque
Office of Inspector General
c/o Mr. Peter J. Pacheco – Interim Inspector General
Via email only: ppacheco@cabq.gov

Re: Final Report for Investigation and Legal Review of the City Attorney in Relation to
Adverse Legal Proceedings Between the Mayor and the City Council.

Dear Mr. Pacheco:

We write to provide the Office of Inspector General (“OIG”) with our final investigative report and legal opinion regarding the City Attorney’s conduct in relation to adverse legal proceedings between the Mayor and the City Council involving Resolution R-25-122 (Mar. 2025). This report is organized into six sections, with four exhibits, as follows:

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¹ As an attorney-client communication, this document is privileged and protected from disclosure absent enforceable court order. *See*, Rule 11-503 and Rule 16-106, NMRA. Additionally, as an OIG investigation report, this document is to remain confidential, with limited exceptions, until made final and published. *See*, ROA 1994, § 2-17-8(B).



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SECTION 1 – SCOPE OF REVIEW

The City of Albuquerque (the “City”) engaged our law firm to investigate and review a matter referred to the OIG by way of [Joint Letter](#) sent on behalf the Mayor and the City Council, dated December 23, 2025.² The Joint Letter directs OIG to retain independent legal counsel to assist in an investigation and legal review to determine whether the City Attorney complied with conflict-of-interest requirements in connection with three related lawsuits regarding the validity of a March 2025 Council Resolution (R-25-122) legislating staffing requirements for Albuquerque Fire and Rescue (“AFR”):

- *City of Alburquerque v. Miguel Tittmann, in his official capacity as President of International Association of Fire Fighters Local 244, et al.*, Albuquerque Labor Board, Case No. LB-25-07 (the “Prohibited Practice Proceeding”);
- *Mayor v. City Council*, Albuquerque Intragovernmental Conference Committee, Case No. 01-2025 (the “Separation of Powers Proceeding”); and
- *Mayor v. City Council*, State of New Mexico, County of Bernalillo, Second Judicial District Court, Case No. D-202-CV-2025-02459 (the “Declaratory Judgment Action”).³

The Joint Letter⁴ identifies seven areas subject to investigation and legal review:

1. Review the City Attorney’s actions in connection with the AFR Proceedings.
2. Determine whether the City Attorney contractually obligated herself to participate in the AFR Proceedings in a manner adverse to the City Council.
3. Determine whether the City Attorney or members of her office participated in the AFR Proceedings.
4. Determine whether the City Attorney or members of her office participated in meetings, strategy sessions, document review, drafting, and redlining of pleadings filed against the City Council.

² The terms and scope of our engagement are further defined in our Professional Services Agreement with the City, dated Feb. 10, 2026.

³ These three suits are collectively referred to as the “AFR Proceedings”.

⁴ The Joint Letter incorporates an earlier request made by the City Council, alone, via [OC-25-59](#) (Dec. 12, 2025), seeking investigation and review of the same matters.



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5. Assuming the City Attorney participated in the AFR Proceedings, determine whether such participation constituted an impermissible conflict-of-interest.
6. Evaluate the City Attorney's compliance with all applicable Charter provisions, ordinances, resolutions, and Rules of Professional Conduct
7. Determine whether cause exists to remove the City Attorney from office, pursuant to Article V, Section 4(e) of the Albuquerque City Charter.

SECTION 2 – INVESTIGATION AND LEGAL REVIEW

As part of our investigation, we conducted a comprehensive review of relevant materials, including:

- materials provided by the City Council;
- materials provided by the City Attorney; and,
- other materials obtained from the public record.⁵

In addition, we interviewed the following individuals with relevant knowledge:

- Councilor Brook Bassan (Mar. 17, 2026);
- Director of City Council Services Isaac Padilla (Mar. 17, 2026);
- City Chief Administrative Officer Dr. Samantha Sengel (Mar. 17, 2026);
- City Chief Financial Officer Carla Martinez (Mar. 17, 2026); and
- City Attorney Lauren Keefe⁶ (Apr. 30, 2026).

For purposes of the legal review, we researched and referred to a comprehensive compilation of applicable legal authorities, including:

- City Charter;
- City Ordinances (“ROA 1994”);
- City Resolutions;
- New Mexico Rules (“NMRA”);
- Case precedent;
- Restatements of Law;

⁵ See, **Exhibit A** for a complete inventory of materials reviewed during our investigation.

⁶ The City Attorney was cooperative during our investigation. The City Attorney provided a written response, submitted to interview, and produced her redline edits to pleadings provided to the law firm representing the Mayor in the AFR Proceedings.



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- State Bar ethics opinions;
- Municipal legal opinion letters; and
- Legal publications.⁷

SECTION 3 – EXECUTIVE SUMMARY

With regards to the City Attorney’s alleged participation in the AFR Proceedings, we offer the following findings of fact:

1. The City Attorney had limited involvement in the AFR Proceedings.
2. The City Attorney did not contractually oblige herself to participate in the AFR Proceedings in a manner adverse to the City Council.
3. There is no evidence of the City Attorney participating in the AFR Proceedings in a manner adverse to the Council.
4. The City Attorney did not appear before the ICC, or any other tribunal involved in the AFR Proceedings, as an advocate or legal representative for the Mayor.

Turning to the legal issues involving the City Attorney’s compliance with conflict-of-interest rules, we offer the following legal opinions:

1. The City Attorney’s limited involvement in the AFR Proceedings did not constitute an impermissible conflict-of-interest.
2. With regards to the AFR Proceedings, the City Attorney complied with applicable Charter provisions, Ordinances, Resolutions, and Rules of Professional Conduct.
3. The City Attorney’s limited involvement in the AFR Proceedings does not establish a basis to remove the City Attorney from office for cause under Article V, Section 4(e) of the Charter.

SECTION 4 – INVESTIGATIVE FINDINGS

This matter involves a mix of factual issues involving the City Attorney’s alleged participation in the AFR Proceedings and legal issues involving the City Attorney’s compliance with conflict-of-interest rules. The legal analysis depends heavily on the underlying facts. Accordingly, we will address the factual inquiries first.

...

...

⁷ See, **Exhibit B** for a complete inventory of legal authorities reviewed during our evaluation.



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1. The City Attorney Had Limited Involvement in the AFR Proceedings.

OC-25-59 alleges “[u]pon information and belief, despite the existence of a concurrent conflict of interest, the City Attorney, both personally and through members of the Office of the City Attorney, participated in all three proceedings...” More specifically, OC-25-59 alleges, upon information and belief, that the City Attorney “participated in meetings, strategy sessions, document review, drafting, and redlining of pleadings filed against the City Council.” These related allegations are primarily based on the Council’s review of the Modrall billing records from March through June 2025, which include references to the City Attorney and staff.

Our review of the Modrall billing records identified the following findings. In total, the billing records contain 177 separate time entries, reflecting 359.7 hours of legal work. Of those entries, only 16⁸ refer to the City Attorney or her staff⁹ (namely, Assistant City Attorney Catherine Gonzales) – accounting for a total billing time of 29 hours.¹⁰

Date	Description	Hours
3/2/25	Multiple calls with CAO, Modrall and City Lawyers, review background documents and drafts of filings	3.3
3/3/25	Zoom conference with Catherine Gonzales to discuss Resolution before the City Counsel and the Prohibited Practice Complaint to be filed.	0.8
3/3/25	Meeting with City and Modrall lawyers, communications regarding exhibits, IPRA requests, and Litigation Hold, limited review of same	1.4
3/4/25	Communications with CAO, Fire Chief, City Legal, and Modrall lawyers regarding legal options going forward given City Council's vote; research issues related to Parties, injunctive relief, administrative actions, original writs	2.4
03/5/25	Analyze timeline and emails provided by City Attorney regarding the underlying negotiations, and draft Amended Prohibit Practice Complaint to add other City Councilors as defendants and add claims of bad faith bargaining and breach of CBA.	4.3
3/5/25	Meeting with CAO, Fire Chief, City Attorney and others, calls with Jennifer Kittleson and Cat Gonzales, research regarding clerk duties, resolutions/ordinances, review and edit drafts of pleadings	2.4
3/6/25	Multiple emails with City attorneys regarding amended PPC.	0.3
3/13/25	Analyze redlines from the City Attorney to the Complaint for Declaratory and Injunctive Relief.	0.4
3/24/25	Analyze the City Attorney's redlined changes to the State Court Complaint,	1.2

⁸ 16 out of 177 entries equates to 9%.

⁹ There are 3 entries that refer to Assistant City Attorney Catherine Gonzales (3/3/25, 3/5/25). All other entries involve references to the “City Attorney”, “City Lawyers”, or to “Lauren Keefe”.

¹⁰ These 16 entries include block billing. As a result, the time associated with points of contact with the City Attorney are combined with activities that did not involve the City Attorney. As a result, the time spent by the City Attorney and her staff in connection with the referenced entries was less than 29 hours out of a total of 359.7 hours, or 8%.

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	and add additional suggested redlined edits to the draft First Amended Complaint.	
3/25/26	Analyze comments from City Attorney regarding the ICC Statement of Issues.	0.6
3/25/25	Editing the Statement of Issue for the IGCC after feedback from City - reorganize the document, trim statement of the case, enhance the introduction	2.4
3/31/25	Analyze revised ICC Statement of Issues, with revisions from the City Attorney, and make further edits in preparation for submission to the Committee.	2.0
5/30/25	Meeting with CAO Samantha Sengal, Lauren Keefe, Chief Emily Jaramillo, and Brian K. Nichols to discuss the Labor Board and ICC hearings.	2.4
5/30/25	Prepare for meeting with CAO, Fire Chief, and City Attorney by reviewing briefing before the ICC.	0.5
5/30/25	Meeting with CAO, City Attorney, Fire Chief regarding Hearings on June 2 (Labor Board), Juen 3 (IGCC), prepare for same, and amend argument outline after same	4.4
6/9/25	Call with Cat Gonzales regarding whether to submit a proposed order to the Labor Board regarding the issue of Councilor immunity.	0.2
	Total:	29.0

We addressed the Modrall billing records with City Attorney Keefe. Prior to our interview, City Attorney Keefe provided a written response describing the extent of her involvement in the AFR Proceedings.¹¹ During the interview, City Attorney Keefe provided credible responses that conform with the information provided in the written response. The City Attorney stated that she:

- Prepared the initial draft PPC on March 1, 2025 (before the Council vote) and delivered the same to Modrall for further work and filing;
- Participated in one phone call (3/2/25), one email exchange (3/6/25), and several meetings (3/4/25, 3/5/25, and 5/30/25) with the Modrall Attorneys; and,
- Provided Modrall with redline edits to three pleadings:
 - First Amended Prohibited Practice Complaint (3/18/25);¹²
 - First Amended Complaint for Declaratory Judgment and Injunctive Relief (3/24/25); and
 - Petitioner's Statement of Issues for the Separation of Powers Proceeding (3/25/25).

Additionally, the City Attorney confirmed that her staff member, Assistant City Attorney Catherine Gonzales participated in two meetings (3/3/25 and 3/5/25) and one phone call (5/30/25) with the Modrall attorneys, as reflected in the billing statements.

¹¹ See, Pgs. 2-3.

¹² With regards to the draft PPC, the City Attorney commented that the City was the petitioner (not the Mayor) and, therefore, it was necessary for the Office of the City Attorney to be involved.

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With regards to the redline edits, the City Attorney stated that she made limited edits to clarify factual background and denied making edits to the legal arguments. As for the meetings that followed the initial filings, the City Attorney stated that her involvement and the involvement of her staff was limited to high-level status discussions and a request that Modrall drop a legal argument that legislative immunity did not apply at the local level – explaining that the City had historically and consistently taken the position that Councilors had immunity from suit.

Stated another way, the only verified legal input or influence exercised by the City Attorney with regards to Modrall's handling of the matter was to interject a pro-Council legal position, for the direct benefit of each individual Councilor. Ultimately, Modrall conceded the point and dropped its challenge to legislative immunity, consistent with the City Attorney's prior request.

Following interview, the City Attorney produced for our inspection the three draft pleadings containing her redlines edits:

- W5305903.DOCX –Draft First Amended Prohibited Practice Complaint;
- W5319447.DOCX–Draft First Amended Complaint for Declaratory Judgment;
and
- W5326758.DOCX–Draft Petitioner's ICC Statement of Issues.

The redlines to the Amended PCC include both factual edits and the addition of new legal causes of action.¹³ However, as noted, the PCC is distinct because the City was the petitioner. It was both necessary and appropriate for the City Attorney to provide this type of substantive input into how the PCC should be framed.

The City Attorney's edits to the Amended Complaint for Declaratory Judgment and the ICC Statement of Claim (5 edits in total between both pleadings) are limited to noncontroversial background information and grammatical revisions.¹⁴ The City Attorney did not make any substantive legal edits to either of these pleadings.

In sum, the City Attorney's involvement in the AFR Proceedings was limited in both scope and nature.¹⁵ There is no evidence that the City Attorney participated in the AFR Proceedings in a manner adverse to the Council, except as necessary and appropriate for the faithful discharge of her duties with respect to the Prohibited Practice Proceeding brought on behalf of the City. Nor is there any evidence that the City Attorney acted in concert with the Mayor or otherwise attempted to influence the outcome of the AFR Proceedings to favor the Mayor's interest over

¹³ See, Summary of Redline Edits to W5305903.

¹⁴ See, Summary of Redline Edits to W5319447; and Summary of Redline Edits to W5326758.

¹⁵ This finding encompasses the City Attorney personally and her staff. See, Summary of City Attorney's Verified Involvement in AFR Proceedings. The City Attorney confirmed that the Modrall billing records accurately capture the extent of involvement by the City Attorney personally and her staff in the matters related to the AFR Proceedings. We did not discover any evidence of additional involvement in the AFR Proceedings by staff members within the Office of City Attorney. For these and other good reasons, we concluded that it was not necessary to interview staff within the Office of City Attorney.

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the Council's interest.¹⁶

2. The City Attorney did not contractually oblige herself to participate in the AFR Proceedings in a manner adverse to the City Council.

OC-25-59 alleges “[u]pon information and belief, despite [acknowledging a conflict], the City Attorney contractually obligated herself to participate in litigation against the City Council.” This allegation is based on a distinction in verbiage defining the Scope of Services for the two Legal Service Agreements related to the Declaratory Judgment Action: one with the Modrall law firm for representation of the Mayor and the other with the Bardacke law firm for representation of the Council. We have included the relevant portions of the Legal Services Agreement with each law firm below.

▪ Modrall Agreement:

1. **Scope of Services.** The Contractor shall provide the following legal representation and other legal services (hereinafter the "Services") in conjunction and association with the City Attorney in the following cases:

Keller v. Albuquerque City Council, D-202-CV-2025-02459 and other legal matters, as assigned.

▪ Bardacke Agreement:

1. **Scope of Services.** The Contractor shall provide the following legal representation and other legal services ("Services") in conjunction and association with the City Council's General Counsel in the following cases:

- Keller v. Albuquerque City Council, D-202-CV-2025-02459; PO-25-38323
- And other Risk or Legal matters, as assigned.

In our view, this distinction does not establish that the City Attorney contractually obligated herself to participate in the Declaratory Judgment Action in a manner adverse to the Council. As a technical matter, the City Attorney is not a party to the Modrall Agreement. The City and the Modrall firm are the only parties to the Agreement, and the terms do not create any enforceable legal obligations vis-à-vis the Office of the City Attorney. Although the City Attorney is a signatory to the Agreement, the City Attorney signed the Agreement as a legal representative of the City, not the Office of City Attorney, the same as with the Bardacke Agreement.

Furthermore, the dates and circumstances are important. The Council has its own General Counsel, which at the time was Kevin Morrow, Deputy Director of Council Services. In contrast, the Office of Mayor does not have its own General Counsel or other legal advisor outside of the City Attorney. The City Attorney reports that:

¹⁶ Relatedly, the Council did not identify, nor did we discover, any evidence of prejudice to the Council as a result of the City Attorney's involvement in the AFR Proceedings.

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- The language in the Modrall Agreement is standard language and that she did not consider whether some alternative term or language was necessary at the time she prepared the Agreement;
- The Modrall Agreement was prepared in rushed fashion, over the weekend on Saturday, March 1, 2025, based on the anticipated Council vote the coming Monday, March 3, 2025. This is consistent with the Term of Agreement at Section 2, which identifies March 1, 2025, as the commencement date;
- At the time, the Council had not voted on the resolution and thus the dispute between the Mayor and Council had not ripened into an actual legal conflict;
- Whereas, the Bardacke Agreement was prepared several weeks later, after the Council vote, after the City filed the Prohibited Practice Action, and after the Mayor filed the Separation of Powers Action and Declaratory Judgment Action;
- Once the Declaratory Judgment Action was filed, she promptly advised Deputy Directory of Council Services (Kevin Morrow, General Counsel) that she had a conflict of interest and the City Council would need to obtain separate counsel, and the Council elected to hire the Bardacke law firm;
- The City Attorney deviated from the standard verbiage when preparing the Bardacke Agreement to account for developments since the March 3rd Council vote.
- The standard verbiage contained in the Modrall Agreement did not establish, nor was it intended to establish, any form of enforceable legal obligations on the part of the City Attorney.
- Given the substantial City interests at stake, some degree of oversight and involvement by the City Attorney was necessary in order to protect the City interest and to properly discharge the duties of the Office of City Attorney.

Based on the foregoing, we conclude that the terms of the Modrall Agreement did not oblige the City Attorney to in the AFR Proceedings in a manner adverse to the Council and that verbiage therein was not intended nor understood to impose such requirements.

SECTION 5 – LEGAL ANALYSIS

1. The City Attorney’s limited involvement in the AFR proceedings did not constitute an impermissible conflict-of-interest.

As a starting point for the legal analysis, it is important to clarify the role, professional standards, and ethical requirements of the City Attorney.

The role of City Attorney is distinct from that of the private lawyer. All lawyers have a duty to avoid conflicts of interest.¹⁷ However, the requirements and analysis for determining conflicts for a governmental attorney, such as the City Attorney, are different.

¹⁷ See, Rule 16-107; see also, Rule 16, Preamble, ¶ 9 (“In the nature of law practice, however, conflicting

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Private attorneys are subject to Rule 16-107, which generally prohibits attorneys from engaging in representation involving a concurrent conflict of interest between two or more clients.¹⁸

As a governmental attorney, the City Attorney is subject to Rule 16-113, titled *Organization as client*. The distinction is important because:

Defining precisely the identity of the client and prescribing the resulting obligations of such lawyers may be more difficult in the government context ...

Thus, when the client is a governmental organization, a different balance may be appropriate between maintaining confidentiality and assuring that the wrongful act is prevented or rectified, for public business is involved.¹⁹

An organizational client is a legal entity, but it cannot act except through its ... constituents.²⁰

This does not mean, however, that constituents of an organizational client are the clients of the lawyer.²¹

OC-25-59 relies on Rule 16-107 without reference to Rule 16-113 and, as a result, misconstrues the role and responsibility of the City Attorney. For example, OC-25-59 refers to:

- “[t]he City Attorney’s *dual role as attorney to both the Mayor and City Council*”;²²
- “[t]he City Attorney serves as legal counsel to both the Mayor and the City Council ... the City Attorney is Prohibited from representing either *client* when their legal positions are in conflict.”²³

responsibilities are encountered... Such issues must be resolved through the exercise of sensitive professional and moral judgment guided by the basic principles underlying the rules.”).

¹⁸ *But see*, Rule 16-107, Comment [34], citing Rule 16-113, ¶A (“A lawyer who represents a corporation or other organization does not, by virtue of that representation, necessarily represent any constituent or affiliated organization, such as a parent or subsidiary.”).

¹⁹ Rule 16-113, Comment [9].

²⁰ Rule 16-113, Comment [1].

²¹ Rule 16-113, Comment [2] (emphasis added).

²² OC-25-59, ¶4.

²³ OC-25-59, ¶16.



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The above references misstate the nature of the City Attorney's role and ethical duties.

The City Attorney does not serve in a “*dual role as attorney to both the Mayor and the Council*.” Rather, the municipal organization of the City of Albuquerque is the sole client of the City Attorney. Additionally, while the City Attorney may have certain duties to advise and at times represent in court both the Office of Mayor and the City Council, these constituent subdivisions are not “clients” of the City Attorney.²⁴

A. The City Attorney Complied with the Rules of Professional Conduct and Local Ordinances and Resolutions.

OC-25-59 seeks compliance review in connection with three points of law: (i) the Rules of Professional Conduct, (ii) City Resolution § 3-2-5, and (iii) City Ordinance § 2-7-2-2.

²⁴ See, Rule 16-113(A); Restatement (Third) of the Law Governing Lawyers §§ 96 and 97; *Civil Service Comm'n v. Superior Court*, 163 Cal. App. 3d 70, 78 (Ct. App. 1984) (“a public attorney’s advising of a constituent public agency does not give rise to an attorney-client relationship separate and distinct from the attorney’s relationship to the overall government entity of which the agency is a part.”); *Handverger v. City of Winooski*, 38 A.3d 1158 (Vt. 2011) (it is “settled in Vermont and other states that the actual client of the city attorney is the municipality.”); *Handverger v. City of Winooski*, 2011 VT 134 (Vermont Supreme Court held that “an organization’s lawyer, such as a city attorney or corporate counsel, works only for its constituents, including its employees and officials, in order to serve the organization, not to serve those individuals personally.” --- charter mandate to provide advise to various constituents did not create attorney-client relationship with any one of those constituents); *Salt Lake Cnty. Comm’n v. Short*, 1999 UT 73, ¶ 17, 985 P.2d 899, 905 (“the County Attorney has an attorney-client relationship only with the County as an entity, not with the Commission or the individual commissioners apart from the entity on behalf of which they act.”); *State ex rel Cannizzaro*, 466 P.3d 529, 532 (Nev. 2020) (the Nevada Legislative Counsel Bureau represented the Legislature, not individual legislators); *Ward v. Superior Court*, 70 Cal. App. 3d 23 (Ct. App. 1977) (“the Los Angeles County Counsel has only one client, namely, the County of Los Angeles.”); Cal. Ethics Op. 2001-156 (“Neither the mayor nor the city council, independent of the city itself, established an attorney-client relationship with the city attorney by seeking legal advice on proposed ordinances because neither had the potential to become the city attorney’s client against the other... no conflict for the government attorney is created by a disagreement between a government entity and its constituents or between constituents of the entity[.]”); Delaware State Bar Association Committee on Professional Ethics Opinion 2008-3 (a lawyer for an entity “has just one client.”); New Jersey Advisory Committee on Professional Ethics Op. No. 441 (“a municipal attorney represents the entire municipality.”); Oregon Board of Governors Formal Opinion No. 2005-67 (“County Counsel only has one client: County.”); State Bar of Michigan RI-112 (prosecuting attorney, who represented county in civil matters, did not violate the rules of professional conduct by bringing action against county commissioners; “it is clear there is no conflict of interest within the meaning of MRPC 1.7 because the county itself, not the individual commissioners, is the ‘client’ of corporation counsel.”); Supreme Court of Texas Professional Ethics Committee Op. No. 567 (“The city attorney does not represent the individual city council members.”); Virginia Legal Ethics Opinion 1836 (“mere fact that the Council or Mayor disagree on policy or legal issues does not necessarily create a conflict of interest for the City Attorney, precluding him from continuing to serve as their chief legal advisor under the Charter.”---“It is not unusual for organizational constituents to disagree with one another. In such a case, the attorney’s ethical obligation is to the organization, and the organization must resolve its conflicts through its own procedures. However, when the interest of one constituent becomes or may become adverse to that of the organization, then the lawyer should counsel that constituent to obtain separate representation.”); Washington State Bar Assoc. Advisory Opinion 2173 (“as city attorney, the Inquirer represents the city rather than the mayor, the city council, or individual council members.”).

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(i) **The City Attorney Complied with Rule 16-113.**

As addressed above, Rule 16-113 governs the City Attorney's duties in representing the City of Albuquerque as her governmental client. Rule 16-113 provides as follows:

16-113. Organization as client.

A. **Generally.** A lawyer employed or retained by an organization represents the organization acting through its duly authorized constituents.

B. **Acting in best interest of organization.** *If a lawyer for an organization knows that an officer, employee or other person associated with the organization is engaged in action, intends to act or refuses to act in a matter related to the representation that is a violation of a legal obligation to the organization, or a violation of law that reasonably might be imputed to the organization, and that is likely to result in substantial injury to the organization, then the lawyer shall proceed as is reasonably necessary in the best interest of the organization. Unless the lawyer reasonably believes that it is not necessary in the best interest of the organization to do so, the lawyer shall refer the matter to a higher authority in the organization, including, if warranted by the circumstances to the highest authority that can act on behalf of the organization as determined by applicable law.*

In this instance, the City Attorney complied with Rule 16-113 by:

- Delivering her written analysis on the implicated legal issues to the Mayor and the City Council prior to the Council vote;
- Identifying the conflict of interests as between the City and the Council with respect to the Prohibited Practices Proceeding and the subsequent Separation of Powers Proceeding and the Declaratory Judgment Action between the Mayor and the Council;
- Taking actions reasonably necessary in the best interests of the City while avoiding prejudice to either the Mayor or the City Council;
- Ensuring that the issues in dispute were properly framed and referred to the highest authority on the matter via (i) the City's PPC filing with the Labor Board, (ii) the Mayor's separation of powers petition to the ICC, and (iii) the Mayor's state court action seeking declaratory judgment and injunctive relief;
- Retaining independent counsel for both the Mayor and the Council; and

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- Refraining from representing either the Mayor or the Council in the AFR Proceedings.²⁵

In our legal opinion, the City Attorney's conduct demonstrates a prudent and appropriate handling of the controversy between the Mayor and the Council.

Additionally, it is worth noting that the ICC's final findings and order are consistent with the analysis and forecast provided by the City Attorney to City Council before its March 3, 2025 vote. Although not dispositive, this point demonstrates that the Council's passage of the resolution raised important issues involving separation of powers under the City Charter, warranting action by the City Attorney to protect the City's interest.

(ii) **The City Attorney Complied with Resolution § 3-2-5.**

City Resolution § 3-2-5, titled *Relationship Between the City Council and the City Attorney*, provides as follows:

(A) It is the duty of the City Attorney, in addition to other duties prescribed by law, City Charter and City Ordinances, and imposed thereon by the executive, to attend all meetings of the City Council both regular and special.

(B) The City Attorney is the legal advisor of the City Council, and shall render advice on all legal questions affecting the city, whenever requested to do so by the City Council.

(C) It is the duty of the City Attorney to draft or review upon request of the City Council, ordinances, resolutions or acts creating rights covering any subjects within the power of the city.

(D) All duties herein specified may be delegated by the City Attorney in his discretion to qualified members of the Legal Department.

(E) Notwithstanding the provision of divisions (B) and (C) above, ***the City Attorney may decline to represent both the executive and the Council, when in his opinion stated in writing to both, he declares himself unable to do so because the legal positions of the parties are in conflict. In such case, the Council will provide for representation by other attorneys of their selection.***

In our legal opinion, the recusal language under Subsection (E) provides the City Attorney with a discretionary option to decline dual-representation when Mayor and Council are in conflict. However, Subsection (E) does not mandate recusal. This reading is consistent with Rule 16-113

²⁵ The scope of the City Attorney's verified involvement in the proceedings is discussed above. Importantly, the City Attorney did not represent or formerly appear on behalf of either the Mayor or the Council in any of the AFR Proceedings.

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and the broad latitude afforded to governmental attorneys to do that which is necessary under the circumstances to protect the interests of the governmental client, notwithstanding a conflict of interests between constituent subdivisions.

To the extent Subsection (E) may be read to impose a mandatory duty of recusal, the City Attorney complied with the identified recusal procedure for the reasons outlined in Section 1(A)(i) directly above (i.e., she disclosed her analysis, identified the conflict, framed the issues for referral to the highest authority, retained independent counsel, and abstained for representing either party).

(iii) **The City Attorney Complied with Ordinance § 2-7-2-2.**

Ordinance § 2-7-2-2, titled *Authority and Duties of the City Attorney*, provides as follows:

The City Attorney, both personally and through his or her assistant city attorneys, shall represent the city in the courts. He or she shall also advise the Mayor and the Council as to legal matters. The City Attorney and assistant city attorneys, while acting in the course and scope of their duties, are prohibited from engaging in policy advocacy relating to matters upon which the City Legal Department has or is likely to be called upon for advisement or representation. Nothing herein shall prohibit the City Attorney or assistant city attorneys from expressing their personal views on any issue while acting outside the scope of their duties.

The Council cited this ordinance in support of the suggestion that the City Attorney's duty to advise and appear in court on behalf of the City Council gives rise to a traditional attorney-client relationship, which as addressed above misconstrues the role and duties of the City Attorney. In any event, the City Attorney discharged her duty to advise the City Council on legal matters when she delivered her written legal analysis on the matter to the Council, prior to the Council's vote and the institution of legal proceedings to challenge the resolution.

2. **The City Attorney's Involvement in the AFR Proceedings Does Not Establish a Basis to Remove the City Attorney From Office for Cause.**

The City Attorney is appointed by the Mayor with the advice and consent of the Council.²⁶ Removal of the City Attorney is governed by the City Charter at Section 4. DUTIES OF THE MAYOR, Subsection (e)(3), which provides as follows:

The Mayor shall:

* * *

²⁶ See, City Charter § 4; see also, City Ordinance § 2-7-2-3.

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(e) Select and remove the City Attorney only as follows:

1. The City Attorney shall be selected and appointed through an open and competitive hiring process conducted by the Mayor with the advice and consent of two-thirds of the entire membership of the Council.

2. The City Attorney's appointment shall be for a term that coincides and terminates with the term of the Mayor making the appointment unless sooner removed as provided herein.

3. ***The City Attorney may only be removed from office for cause by the Mayor with the concurrence of two-thirds of the entire membership of the Council after cause has been determined by the Director of the Office of Internal Audit and Investigations.***²⁷

The City Council does not have independent legal authority to remove the City Attorney. Rather, the power to select and remove the City Attorney is vested solely in the Mayor. The Council's oversight authority vis-à-vis the City Attorney is limited to a regular performance review and reporting process, as provided under City Ordinance § 2-7-2-4. In any event, given our investigatory findings and legal opinion affirming the propriety of the City Attorney's involvement in the AFR Proceedings, we further conclude that the City Attorney's conduct does not establish nor support cause to terminate the City Attorney.

SECTION 6 – CONCLUSION

We appreciate the opportunity to work with OIG on this matter and to present this report. The matters referred for review involve nuanced legal issues. Indeed, the wealth of case precedent regarding the role of the governmental attorney as cited above demonstrates that these issues arise frequently, resulting in a large body of case precedent and ethics opinions clarifying the unique role of the governmental attorney. As outlined above, we conclude that the City Attorney complied with her professional and legal duties in connection with the AFR Proceedings. This report is supported by the materials at Exhibits A through D below. Please let us know if you have any questions or wish to schedule a meeting to review this report together.

Sincerely,

JENNINGS HAUG KELEHER MCLEOD WATERFALL LLP



Andy J. Chambers

²⁷ Emphasis added.

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EXHIBIT A:
INVENTORY OF MATERIALS REVIEWED

- Attorney-Client Inter-Office Memorandum from the City Attorney Re: R-25-122 (Mar. 2, 2025).
- Council Resolution No. R-25-122 (Mar. 3, 2025).
- Interoffice Memorandum from the City Clerk Re: R-25-122 (Mar. 21, 2025).
- Compilation of materials provided by Councilor Brook Bassan (Feb. 26, 2026).
- Case file for the prohibited practices proceeding before the City’s Labor Board, *City of Albuquerque v. Miguel Tittmann, in his official capacity as President of International Association of Fire Fighters Local 244, et al.*, Case No. LB-25-07 (the “Prohibited Practice Proceeding”), including the City’s First Amended Complaint naming certain individual Council Members as respondents to the proceeding (Mar. 2025 to Mar. 2026).
- Case file for the separation of powers proceeding before the Albuquerque Intragovernmental Conference Committee, *Mayor v. City Council*, Case No. 01-2025 (the “Separation of Powers Proceeding”) , including the Findings of Fact and Conclusions of Law and the Final Order invalidating Council Bill No. R-25-122 (Apr. 2025 to July 2025).
- Case file for the Declaratory Judgment and Injunctive Relief action before the State of New Mexico, County of Bernalillo, Second Judicial District Court, *Mayor Tim Keller v. Albuquerque City Council*, Case No. D-202-CV-2025-02459 (Mar. 2025 to Jan. 2026).
- Legal Services Agreement between Modrall Sperling and the City for representation of the Mayor in the Declaratory Judgment and Injunctive Relief action, Case No. D-202-CV-2025-02459 (May 2, 2025).
- Legal Services Agreement between Bardacke Allison Miller LLP and the City for representation of the City Council in the Declaratory Judgment and Injunctive Relief action, Case No. D-202-CV-2025-02459 (August 15, 2025).
- Modrall Sperling Billing Records (March 2025 through June 2025).
- 2025 City Attorney Evaluation, REDW Advisors & Consultants (Aug. 15, 2025).
- OC-25-59 (Dec. 12, 2025).
- Joint Request for Investigation and Review (Dec. 23, 2025).
- *ABQ City Attorney Denies Allegations of “Conflict of Interest” Made by City Council President*, Gillian Barkhust, Albuquerque Journal (Dec. 17, 2025; Modified Jan. 20, 2026).
- *Lawsuit between Mayor, Council over paramedic staffing comes to sudden end*, by Jesse Jones, City Desk ABQ (Feb. 17, 2026; Updated Feb. 22, 2026).
- Written Response to OIG Inquiry, provided on behalf of City Attorney Lauren Keefe (Apr. 29, 2026).



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- Compilation of draft pleadings provided on behalf of City Attorney Lauren Keefe (May 8, 2026):
 - W5305903.DOCX – Draft First Amended Prohibited Practice Complaint (with redline edits);
 - W5319447.DOCX – Draft First Amended Complaint for Declaratory Judgment and Injunctive Relief (with redline edits); and
 - W5326758.DOCX – Draft Petitioner’s Statement of Issues for the Separation of Powers Proceeding (with redline edit).

EXHIBIT B:
TABLE OF LEGAL AUTHORITIES

1. CITY CHARTER

- [Article 5, Section 4](#) – Duties of the Mayor.
- [Article 19](#) – Determination of Separation of Powers Issues Under the Charter.

2. CITY ORDINANCES

- [Chapter 2, Article 7, Part 2, § 2](#) – Authority and Duties of the City Attorney.
- [Chapter 2, Article 7, Part 2, § 3](#) – Appointment of the City Attorney.
- [Chapter 2, Article 7, Part 2, § 4](#) – City Council Performance Review of the City Attorney.
- [Chapter 2, Article 17, et seq.](#) – Inspector General.

3. CITY RESOLUTIONS

- [Chapter 3, Article 2, § 5](#) – Relationship Between the City Council and the City Attorney.

4. NEW MEXICO RULES

- [Rule 16 – Preamble](#) – Rules of Professional Conduct.
- [Rule 16, Article 1, § 7](#) – Conflict of interest; current clients.
- [Rule 16, Article 1, § 13](#) – Organization as client.

5. CASE PRECEDENT

- *Attorney General v. Michigan Public Service Comm’n*, 625 N.W.2d 16 (Mich. Ct. App. 2000).
- *Civil Service Comm’n v. Superior Court*, 163 Cal. App. 3d 70 (Ct. App. 1984).
- *Handverger v. City of Winooski*, 38 A.3d 1158 (Vt. 2011).
- *People v. Christian*, 41 Cal.App.4th 986 (Ct. App. 1996)
- *Salt Lake Cnty. Comm’n v. Short*, 985 P.2d 899 (Utah 1999).
- *State ex rel Cannizzaro*, 466 P.3d 529 (Nev. 2020).
- *Ward v. Superior Court*, 70 Cal. App. 3d 23 (Ct. App. 1977).

6. RESTATEMENTS OF LAW

- [Restatement \(Third\) of the Law Governing Lawyers § 96](#) - Representing an Organization as Client (2000).
- [Restatement \(Third\) of the Law Governing Lawyers § 97](#) - Representing a Governmental Client (2000).

7. STATE BAR ETHICS OPINIONS

- [Advisory Opinion 1990-1](#), State Bar of New Mexico Ethics Advisory Committee (1990).
- [Advisory Opinion 1988-8](#), State Bar of New Mexico Ethics Advisory Committee (1988).
- [Advisory Opinion 1986-1](#), State Bar of New Mexico Ethics Advisory Committee (1986).
- [Formal Op. 2001-156](#), State Bar of California, COPRAC (2000).

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- [Opinion 2008-3](#) Delaware State Bar Ass’n Comm. On Prof’l Ethics (2008).
- [Opinion RI-112](#), State Bar of Michigan, Comm. On Prof’l and Judicial Ethics (1992).
- [Ethics Opinion No. 255](#) of the Mississippi Bar (2007).
- [Opinion No. 441](#), New Jersey Advisory Comm. on Prof’l Ethics (1979).
- [Formal Opinion No. 2005-67](#) Oregon Board of Governors (2005).
- [Opinion. No. 567](#), Prof’l Ethics Comm. for the State Bar of Texas (2006).
- [Legal Ethics Opinion 1836](#), Virginia State Bar, Standing Comm. On Legal Ethics (2007).
- [Advisory Opinion 2173](#), Washington State Bar Assoc. (2007).

8. MUNICIPAL LEGAL OPINION LETTERS

- [Advising the Mayor and City Council: The City Attorney’s Client](#) Office of the City Attorney, City of San Diego (Memorandum of Law No. ML-2010-21, Oct. 5, 2010).
- [City Council Holds the Attorney-Client Privilege Regarding Confidential Advice the City Attorney Provides to Individual Councilmembers](#), City of Oakland, Office of the City Attorney (Public Legal Opinion, May 3, 2017).

9. PUBLICATIONS

- [The Conflicting Ethical, Legal, and Public Policy Obligations of the Government’s Chief Legal Officer](#), Michael A. Cardozo, *The Professional Lawyer*, Vol. 22, No. 3 (2014).
- [Solutions to the City Attorney’s Charter-Imposed Conflict of Interest Problem](#), Heather E. Kimmel, 66 Ohio St. L.J. 1075 (2005).
- [Government Lawyers Ethics Manual](#), Arizona Prosecuting Attorneys’ Advisory Council (1st ed. 2025).
- [THE ROLE OF THE CITY ATTORNEY: Relationships with Other Municipal Actors](#), Debra Margolis, President, City Attorneys’ Department, League of California Cities (Spring Conference paper, 2011).
- [WHO’S THE BOSS? Deciding Who the Client Is When You’re a City Attorney](#), Brigham Smith, 11 T.M. Cooley J. Prac. & Clinical L. 1 (2008).

EXHIBIT C:
SUMMARY OF REDLINE EDITS

W5305903.DOCX
Draft First Amended Prohibited Practice Complaint

Category of Redline Edits	Summary of Changes	Affected Sections / Paragraphs
Caption and pleading title	Changed the pleading title to “First Amended Prohibited Practice Complaint” and expanded the respondent caption to include additional City Council respondents.	Caption; pleading title
Opening allegations and requested relief	Revised the introduction to frame the dispute around IAFF’s efforts to influence City Council, the passage of R-25-122, alleged interference with negotiations, and expanded requested declaratory and injunctive relief.	Introductory unnumbered paragraphs before Parties, Jurisdiction, and Venue
Parties, jurisdiction, and venue	Added City Council respondents and clarified IAFF L244’s role as exclusive bargaining representative.	Parties, Jurisdiction, and Venue; ¶¶ 1–13
Factual background — ALS staffing history	Added allegations concerning prior single-paramedic assignments at Stations 2, 3, and 10; IAFF’s alleged acquiescence; absence of safety objections; and annual exceptions to two-paramedic Rescue staffing.	Factual Background; ¶¶ 14–22
Factual background — bargaining chronology	Expanded and revised allegations about IAFF’s request to bargain, the City’s response, MOU exchanges, revised operational plans, Memo 318, IAFF’s PPC, and continued communications.	Factual Background; ¶¶ 23–44
Factual background — City Council resolution	Added allegations that IAFF contacted Councilors, R-25-122 was introduced and fast-tracked, Councilors acted with knowledge of negotiations, and passage of the resolution interfered with bargaining and management rights.	Factual Background; ¶¶ 45–78
Counts I–III	Revised Section 3-2-10(C) claims to add allegations against Tittmann/IAFF, Lewis and Baca, and the Councilors who voted for R-25-122.	Counts I–III; ¶¶ 79–103



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New bad-faith bargaining claim	Added a new count alleging bad-faith bargaining by Tittmann and IAFF, including reliance on bargaining conduct, alleged Council contacts, past practice, and regressive bargaining concepts.	Count IV: Bad Faith Bargaining; ¶¶ 104–113
New CBA breach claim	Added a new count alleging breach of the CBA based on management-rights provisions, reassignment language, negotiated pay increases, Council lobbying, and past-practice allegations.	Count VI: Breach of Collective Bargaining Agreement; ¶¶ 114–126
Deleted / withdrawn past-practices count	Inserted then struck a proposed “Past Practices” count, including incomplete allegations about implementation locations and dates.	Struck Count VII: Past Practices; internal ¶¶ 1–5
Declaratory relief	Renumbered declaratory relief count, added LMRO language, broadened staffing-decision allegations, and added alternative relief limiting R-25-122 prospectively to a 2027 bid if enforceable.	Count VIII: Declaratory Relief; ¶¶ 127–138; prayer for relief
Certificate of service	Highlighted missing email addresses for several City Council respondents.	Certificate of Service; service list paragraphs following certificate
General cleanup items	Redlines include wording corrections, capitalization changes, exhibit updates, and several drafting notes/placeholders.	Throughout document, including ¶¶ 22, 35, 43, 113, 125, and struck Count VII ¶ 3

W5319447.DOCX

Draft First Amended Complaint for Declaratory Judgment and Injunctive Relief

Category of Redline Edits	Summary of Changes	Affected Sections / Paragraphs
Caption and title revisions	Changed the pleading title to identify the filing as the First Amended Complaint.	Caption/title page; Complaint heading
Party and terminology clarifications	Clarified references to IAFF L244 and replaced less-specific pronouns with the union’s name; added or standardized defined terms including Collective Bargaining Agreement/CBA.	Introduction; Factual Allegations ¶¶ 2, 13, 16–17



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Legal citation formatting and authority updates	Revised citations to the Revised Ordinances of Albuquerque by adding “ROA 1994” before ordinance sections and deleting duplicative trailing references.	Factual Allegations ¶¶ 13–14, 44; Count I ¶¶ 51–52
Factual updates regarding staffing and proceedings	Added detail concerning the ALS staffing plan, the February 2024 bid, and appeal path to this Court; deleted outdated language regarding the Mayor’s deadline to act on R-25-122.	Factual Allegations ¶¶ 36–38
Grammar, punctuation, and style edits	Made minor cleanup edits for punctuation, clarity, and consistency, including comma insertion and removal of exhibit shorthand.	Introduction; Factual Allegations; Count I

W5326758.DOCX

Draft Petitioner’s Statement of Issues for the Separation of Powers Proceeding

Category of Redline Edits	Summary of Changes	Affected Section / Paragraph
Factual background	R-25-122 Section 1 was revised to add “paramedic” before “firefighters” in the staffing requirement for Rescue apparatus, making the requirement: “a minimum of two (2) paramedic firefighters.”	Factual background; ¶8



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EXHIBIT D:
SUMMARY OF CITY ATTORNEY'S VERIFIED INVOLVEMENT

Date	Activity
3/1/25	City Attorney Keefe prepared a shell pleading for the prohibited practice complaint (the "PPC"), to be filed on behalf of the City with Labor Board.
3/2/25	City Attorney Keefe participated in a phone call with attorney Brian Nichols at the Modrall firm to confirm his engagement to represent the City in connection with the Prohibited Practice Proceeding.
3/3/25	Assistant City Attorney Cathrine Gonzales participated in a Zoom conference with Modrall attorneys Brian Nichols and Jennifer Kittleson to discuss the draft PPC.
3/4/25	City Attorney Keefe participated in status meeting with Modrall attorneys to discuss the PPC.
3/5/25	City Attorney Keefe and Assistant City Attorney Gonzales participated in meeting with Modrall attorneys to review the PPC pleadings.
3/6/25	City Attorney Keefe and Assistant City Attorney Gonzales exchange emails with the Modrall attorneys regarding the PPC.
3/13/25	City Attorney Keefe made redline revisions to Amended PPC.
3/24/25	City Attorney Keefe made redline revisions to the draft Complaint for Declaratory Judgment and Injunctive Relief.
3/25/25	City Attorney Keefe made redline revisions to the ICC Statement of Issues.
5/30/25	City Attorney Keefe participated in meeting with the Administration and the Modrall attorneys to review status of the Prohibited Practice Proceeding and the Separation of Powers Proceeding.
6/9/25	Assistant City Attorney Gonzales participated in telephone call with Modrall attorney Jennifer Kittleson regarding submission of proposed order in the Prohibited Practice Proceeding.