



February 18, 2016

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LINCOLN OFFICE

Sent Via E-Mail and  
Certified Mail – Return Receipt Requested



Ms. [REDACTED]

This will acknowledge my receipt of your letter dated January 27, 2016, which you directed to me in my capacity as the Executive Director of the League of Nebraska Municipalities.

As you should be well aware, the League of Nebraska Municipalities (League) and the League Association of Risk Management (LARM) are separate legal entities. Although you are a former employee of LARM, you were not an employee of the League. So your apparent assertion that the League is somehow retaliating against you in any fashion concerning an employment matter is completely unfounded. Not only is your wild claim in this regard simply untrue, but by definition, a claim that an employer somehow “retaliated” against any employee cannot be sustained by an allegation by an employee or former employee that some third party other than the employer engaged in some conduct that the employee chooses to label as somehow “retaliatory.”

Notwithstanding the completely unsolicited statement in Ms. Niemann’s January 12, 2016 email that you would be attending the League’s “Spring and Fall Conferences,” neither you nor GIS Workshop, LLC (GIS Workshop) had registered you or GIS Workshop to attend either or both of those future conferences or any other future League event. On January 15, 2016, I responded to the unsolicited statement in Ms. Niemann’s January 12, 2016 email stating that you would be attending the League’s “Spring and Fall Conferences” and indicated to her that you would not be allowed to do so. On January 25, 2016, GIS Workshop did register Janelle Bartels to attend the League Midwinter Conference and will be allowed by the League to do so. It is completely within the discretion of the League whether it chooses to accept a registration submitted by a possible attendee of any conference or other activity which is conducted by or sponsored by the League.

Despite any claim you may choose to make to the contrary, you simply have no legal right of any kind to register as an attendee for or to attend any conference or other activity conducted by or sponsored by the League. You likewise do not have any legal right to demand that you be permitted

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to attend any such events. The fact that you have made such a demand for something that you have no legal right to demand or to expect in the cloak of your unfounded and unsupported claim of alleged discrimination, harassment, and/or retaliation against you by LARM as your former employer clearly demonstrates that you are attempting to use your untrue and frivolous allegations as a weapon for an improper purpose.

Your characterization of my January 15, 2016 letter to Christine Niemann of GIS Workshop as "unsolicited" is not accurate. It was Ms. Niemann's prior email of January 12, 2016 in which she stated that you "will be attending the League of Nebraska Municipalities Spring and Fall conferences" that made it both appropriate and necessary for me to inform her that you would not be welcome to attend those specific League conferences or any other future League conference. And, in fairness to GIS Workshop, it deserved to be made aware of that as soon as possible so that it would have ample time to make appropriate plans if it wished to have someone else attend future League events as GIS Workshop's representative. As noted above, GIS Workshop did subsequently register Janelle Bartels to attend the League Midwinter Conference.

Your characterization of my January 15, 2016 letter as "unsolicited" is also completely immaterial. You appear to believe that no one can legally make any reference to you or any remark about you unless such information is specifically "solicited" by the person or persons to whom such reference or remark is directed. The right of free speech in this country is not and cannot be so limited. And this is all the more true where the communication is made for a valid business purpose and is also made in response to a specific statement or inquiry that makes it appropriate for the communication to occur.

But even more to the point, all information contained in my letter to Ms. Niemann was true. As such, any claim that my letter could somehow be "defamatory" or could constitute "tortious interference" is unreasonable to the point of being legally frivolous.

The League will not retract the truth. And the League will not permit or accede to your bullying tactics. Please stop making groundless assertions and improper demands.

You are not welcome at and the League will not permit you to register for or attend any League meeting, conference or other event. Please respect the League's position in that regard and do not attend or appear on the premises at which such League meetings, conferences and other events are held. If you choose to ignore this clear directive, you will be regarded as a trespasser.

Sincerely,



L. Lynn Rex  
Executive Director

cc: Patti Hoage, EOC Investigator II  
Nebraska Equal Opportunity Commission