

Exhibit H

× SU Dragstars-Denial.pdf

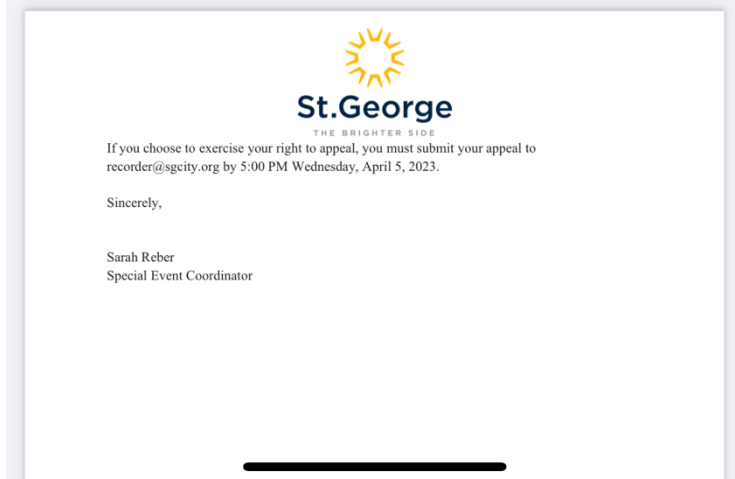
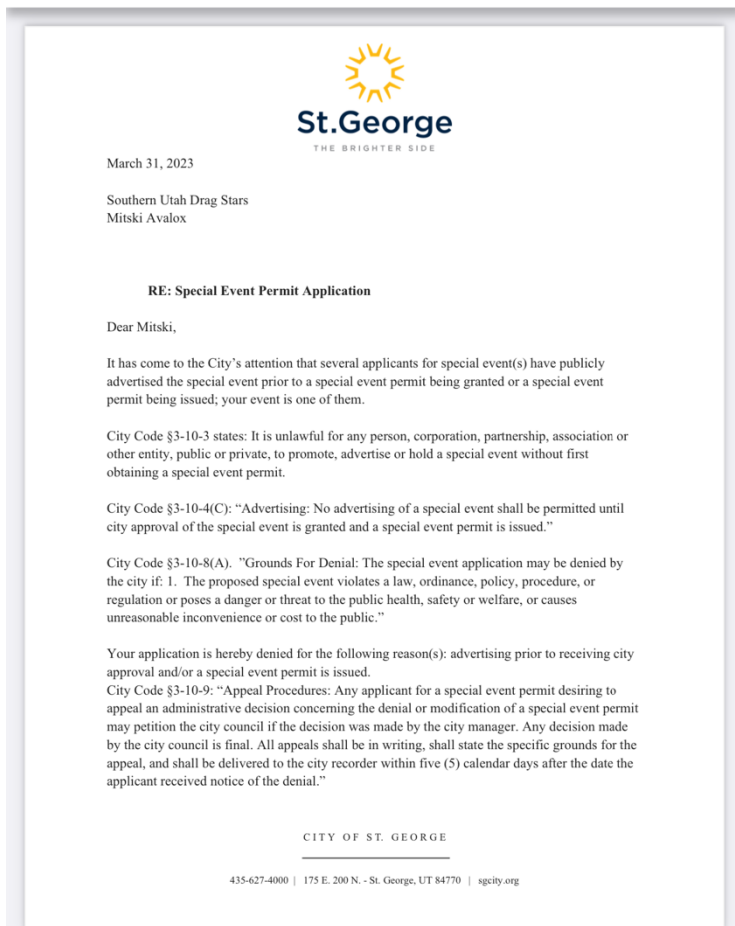




Exhibit I

 March 31 Edit 
8:54 PM

 Cindy Carlie Rutz · 22m · 



13 comments



Like



Comment



Share



8

1 share

Top comments 



Rhanda Hunter Todd

[Admin](#)

I have heard from St. George city that the event permit was denied.

2h Like Reply



Exhibit J



Indigo Klabanoff

Mar 9 · 🌐



Mark your calendar for this special day! 3/11, 9AM-6PM.
Artisans, fashion, decor, food, and so much more!



SAT, MAR 11

Saint George Market

St. George Town Square · St. George, UT

☆ Interested



Marc and 15 friends

👍 2

👍 Like

💬 Comment

➦ Share



Saint George Market created an event.

Jan 6 · 🌐



SAT, MAR 11

Saint George Market

St. George Town Square · St. George, UT

☆ Interested



Dannielle and 15 friends

👍 14

11 comments

👍 Like

💬 Comment

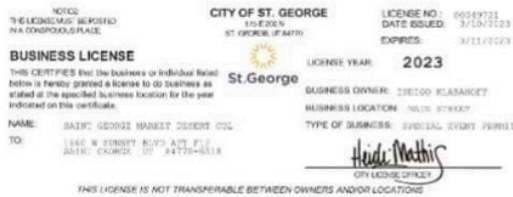
Exhibit K

To Whom It May Concern:

I have been advised that my application has been denied because The Taste of Southern Utah has been advertised for the upcoming event, and for that reason one may not advertise prior to getting a special event permit.:

City Code §3-10-4(C): "Advertising: No advertising of a special event shall be permitted until city approval of the special event is granted and a special event permit is issued." **Not 'and/or'. 'AND'.**

I would invite you to review your city code & its verbiage. If it's taken literally verbatim with the verbiage "and" no one with a special event permit including my outstanding Saint George Market would be able to advertise until the day of the permit issued. Permit is issued for the day of or day before. (see photo below)



Please rescind your letter, and please get me the following answers as I would like to respectfully proceed with this event, given that I produce unique and community friendly events & have a track record of success. Questions from me are below.

1. I have given you everything on my application that has been requested. What day will you have an answer for me on my pending approval? I applied in January.
2. In the meantime what other questions do you have about holding my event at 100 West and Tabernacle? I have provided all you've asked on the application.

Sincerely,

The Seed Inc Brand



Exhibit L

NOTICE
THIS LICENSE MUST BE POSTED
IN A CONSPICUOUS PLACE

CITY OF ST. GEORGE
175 E 200 N
ST. GEORGE, UT 84770

LICENSE NO.: 00049721
DATE ISSUED: 3/10/2023
EXPIRES: 3/11/2023


BUSINESS LICENSE

THIS CERTIFIES that the business or individual listed below is hereby granted a license to do business as stated at the specified business location for the year indicated on this certificate.

NAME: SAINT GEORGE MARKET DESERT CO.
TO: 1640 N FORNEY BLVD APT F17
SAINT GEORGE UT 84770-6518

LICENSE YEAR: 2023

BUSINESS OWNER: ISIDORO ELASANOFF
BUSINESS LOCATION: MAIN STREET
TYPE OF BUSINESS: SPECIAL EVENT PERMIT


Heidi Mathis
CITY LICENSE OFFICER

THIS LICENSE IS NOT TRANSFERABLE BETWEEN OWNERS AND/OR LOCATIONS



St. George

THE BRIGHTER SIDE

April 7, 2023

Mitski Avalox
Southern Utah Drag Stars



Re: Appeal of administrative decision – Denial of event permit

Dear Ms. Avalox,

Your appeal of the denial of an event permit will be heard before the St. George City Council on Tuesday, April 11, 2023 at 2:00 p.m. in the Council Chambers of City Hall located at 175 E. 200 N. in St. George.

Each party is required to submit to the City Recorder, any evidence, witness list, written statements, or written arguments on or before 4:00 p.m. on Monday, April 10, 2023. The information should be delivered via email to recorder@sgcity.org. The Recorder will ensure that the submitted information is shared with the opposing party and the City Council when received.

At the hearing, you will be able to present your appeal, evidence, witnesses, and arguments first. The City will then present their basis for denial. You will have the opportunity for a final rebuttal argument after that presentation.

The City Council, who will be acting in a quasi-judicial capacity, will then deliberate and may do so in private (closed meeting) or in public. They will provide a decision at the conclusion of the proceedings or may take the matter under advisement and announce the decision at a later time. Either way, the decision will be reduced to a written decision, the date of which will commence the start of any further appeal process.

Should you have any further questions, please feel free to contact me.

Sincerely,

Christina Fernandez
City Recorder

CITY OF ST. GEORGE

SOUTHERN UTAH *Dragstars*

Special Event Permit Application Denial Appeal

TO:

City Council

City of St. George

175 East 200 North, St. George, Utah 84770

April 5th, 2023

RECEIVED

APR 05 2023

ST. GEORGE CITY
CITY RECORDER'S OFFICE

Dear City of St George,

I am writing to appeal the denial of my Allies & Community Drag Show Festival special events permit application, which was denied on March 31st, 2023. I believe that the denial was based on favoritism, and I respectfully request that the decision be reconsidered.

I applied for the Allies & Community Drag Show Festival special events permit in order to provide a legal, safe, and community-based event. I provided all the necessary documentation and information, including a vendor list, security plan, and detailed layout of the event. On March 23rd, I received permission from Special Events Coordinator, Sarah Reber, to advertise the event. Despite this, my application was denied on the grounds that I had violated city code §3-10-4(C).

I strongly believe that my application was denied unfairly because of favoritism shown towards another applicant or group of applicants. I have reason to believe that the other applicant or group of applicants may have received preferential treatment due to personal connections, relationships, or other non-related factors as there have been over half a dozen instances in the last year where events were allowed to advertise before the permit was granted.

I request that my application be reconsidered on the basis that other applicants or groups of applicants were allowed to advertise in violation of City Code §3-10-4(C) without repercussion. I am willing to provide any additional information or documentation that is needed to demonstrate my qualifications for the permit. I am confident that I can meet all the necessary requirements and provide a legal, safe, and community-led event for the people of St. George.

Thank you for your attention to this matter. I look forward to hearing from you soon.

Regards,



Mitski Avalox

Chief Executive Officer



March 31, 2023

Southern Utah Drag Stars
Mitski Avalox

RE: Special Event Permit Application

Dear Mitski,

It has come to the City's attention that several applicants for special event(s) have publicly advertised the special event prior to a special event permit being granted or a special event permit being issued; your event is one of them.

City Code §3-10-3 states: It is unlawful for any person, corporation, partnership, association or other entity, public or private, to promote, advertise or hold a special event without first obtaining a special event permit.

City Code §3-10-4(C): "Advertising: No advertising of a special event shall be permitted until city approval of the special event is granted and a special event permit is issued."

City Code §3-10-8(A). "Grounds For Denial: The special event application may be denied by the city if: 1. The proposed special event violates a law, ordinance, policy, procedure, or regulation or poses a danger or threat to the public health, safety or welfare, or causes unreasonable inconvenience or cost to the public."

Your application is hereby denied for the following reason(s): advertising prior to receiving city approval and/or a special event permit is issued.

City Code §3-10-9: "Appeal Procedures: Any applicant for a special event permit desiring to appeal an administrative decision concerning the denial or modification of a special event permit may petition the city council if the decision was made by the city manager. Any decision made by the city council is final. All appeals shall be in writing, shall state the specific grounds for the appeal, and shall be delivered to the city recorder within five (5) calendar days after the date the applicant received notice of the denial."

CITY OF ST. GEORGE



St. George

THE BRIGHTER SIDE

If you choose to exercise your right to appeal, you must submit your appeal to recorder@sgcity.org by 5:00 PM Wednesday, April 5, 2023.

Sincerely,

Sarah Reber
Special Event Coordinator

CITY OF ST. GEORGE

435-627-4000 | 175 E. 200 N. - St. George, UT 84770 | sgcity.org

DSTARS000044

Date Received Application: 3/3/23 Permit No: _____
 Insurance Received: _____ Date Issued: _____

APPROVALS:
 Asst. City Manager: _____
 Date: _____
 Fire: _____ Date: _____
 Conditions of approval: _____
 Police: Please see the Security Plan Request Application for approval and conditions.
 Other Staff Approval: _____
 Date: _____ Rev 09/10/22

SPECIAL EVENT PERMIT APPLICATION



City of St. George Special Events
 175 East 200 North
 St. George, UT 84770

Phone: 435-627-4712
 E-mail: events@sgcity.org

TYPE OF ACTIVITY (check all that apply):

<input type="checkbox"/> Film Production	<input type="checkbox"/> Parade	<input type="checkbox"/> Cycling	<input type="checkbox"/> 5K	<input type="checkbox"/> Training Event	<input checked="" type="checkbox"/> Festival
<input type="checkbox"/> Outdoors Sales	<input type="checkbox"/> Fun Run	<input type="checkbox"/> Sporting	<input type="checkbox"/> 10K	<input type="checkbox"/> Block Party	<input type="checkbox"/> Religious
		<input type="checkbox"/> Dance	<input type="checkbox"/> Other: <u>Drag Show</u>		

Please print or type Our Allies & Community Drag Show

EVENT NAME: _____

1. **Location of Event:** Vernon Worthen Park

2. **Name of Organization:** Southern Utah Drag Stars

3. **Date(s) of Event:** Friday, April 28th, 2023.

4. EVENT DETAILS: [enter Start & End times as HH:MM]

Set-up	Date: <u>04/28/2023</u>	Start time: <u>12:00 P.M. NOON</u>	End time: <u>5:00 PM</u>
Event	Date: <u>Friday, April 28th, 2023.</u>	Start time: <u>5:00 PM</u>	End time: <u>7:30 PM</u>
Clean-up	Date: <u>04/28/2023</u>	Start time: <u>7:30 PM</u>	End time: <u>10:00 PM</u>

Is this a Recurring Event? NO If yes; daily, weekly or other? N/A
 Is this an Annual Event? NO If yes; same date and place? N/A

5. PARTICIPANTS
 # of Participants & Attendees expected: 500 # of Volunteers/Event Staff: 18

Open to the Public Private Group/Party

If event is open to the public, is it: Entrance Fee/Ticketed Event; Fee for Participants/Racers/Runners Only; Free.

6. APPLICANT INFORMATION

Name of Applicant: Mitski Avalöx

Address: _____

Day Phone: _____ Cell/Other: _____ E-mail: mitski@sudragstars.com

Mailing Address (if different): _____

Event Web Address (if applicable): sudragstars.com

Alternate Contact For Event:

Day Phone: N/A Cell/Other: N/A E-mail: N/A

7. VENDORS/FOOD/ALCOHOL (check all that apply)

Yes No Are Vendors/Merchants selling products or services?
 If yes, Temporary Sales Tax Numbers are required from the Utah State Special Event Tax Division 801-297-6303

Yes No Is Food available at the event? Description: _____
 If yes, Is the food (please check all that apply)
 Given away/pre-packaged Catered by: _____ Prepared on site
 Events which have Food available must contact the SW Utah Health Department for approval 435-986-2580

Yes No Will Alcoholic Beverages be available at the event?
 If yes, please check all that apply
 Beer Stands Fenced-in Beer Garden
 Selling, Serving, Giving Away, Alcohol at an event requires City Council, City Business License and State Of Utah Department of Alcoholic Beverage Licensing approval 801-977-6800

8. TENTS/STAGES/STRUCTURES (include details on site map)

Yes No Tents/Pop-up Canopies?
 How many Tents/Pop-up Canopies will be used for the event? _____
 Dimensions of Tents/Pop-up Canopies: 10x10 feet
 All large or enclosed tents/canopies require Inspections from the SG Fire Department 435-627-4150

Yes No Temporary Stage? Dimensions of Stage: 20x40 feet
 Description of Tents/Canopies/Stage, etc.: 10x10 booths that will have canopies.

9. SITE SETUP/SOUND (check all that apply - please include details on site map)

Fencing/Scaffolding

Barricades (must obtain privately)

Portable Sanitary Units (must obtain privately)

Inflatables, Bounce House(s) Generator(s) & Certificate of Liability Insurance are required (must obtain privately)

Climbing Wall, Axe Throwing, Mechanical Bull, Zipline, &/or Dunk Tank Certificate of Liability Insurance is required

Music If yes, check all that apply: Acoustic Amplified

PA/Audio System Type/Description: Microphone and Speaker/Video Screen

Fireworks/Fire Performances/Open Flame Requires approval from SG Fire Dept. 435-627-4150

Propane/Gas On-site Requires approval from SG Fire Dept. 435-627-4150

Trash/Recycle Bin coordination On-site WCSW 435-673-2813

10. ROAD & SIDEWALK USE (please include details on site map)

Yes No Will Roads & Sidewalks Be Used?

Yes No Are you requesting Road &/or Sidewalk Closures?
 An Encroachment Permit is required for Road Closures and Sidewalk Use.
 To obtain the permit, contact SG City Public Works Dept. 435-627-4058 <https://www.sgcity.org/encroachment/>

Road Use and Closure Location: _____

Sidewalk Use Location: _____ Will stay on sidewalks and follow pedestrian laws.

Parade Permit App Location: _____ Number of Floats: _____

11. SECURITY/OTHER (please complete and sign the Security Plan Approval Request Form, for approval of Security)

12. Application Fee is based on attendance, and charged per day, as follows:

\$75.00 for attendance under 300

\$150.00 for attendance over 300

Total: \$ 150.00 (payable to: City of St. George – Attn: Special Events, 175 East 200 North, St. George, UT 84770)

By submitting a signed application, the applicant certifies that falsifying any information on this application constitutes cause for rejection or revocation of the Permit.

Mitski Avalōx _____ 02/15/23
 Applicant's Name [PRINT] Applicant's Signature Date

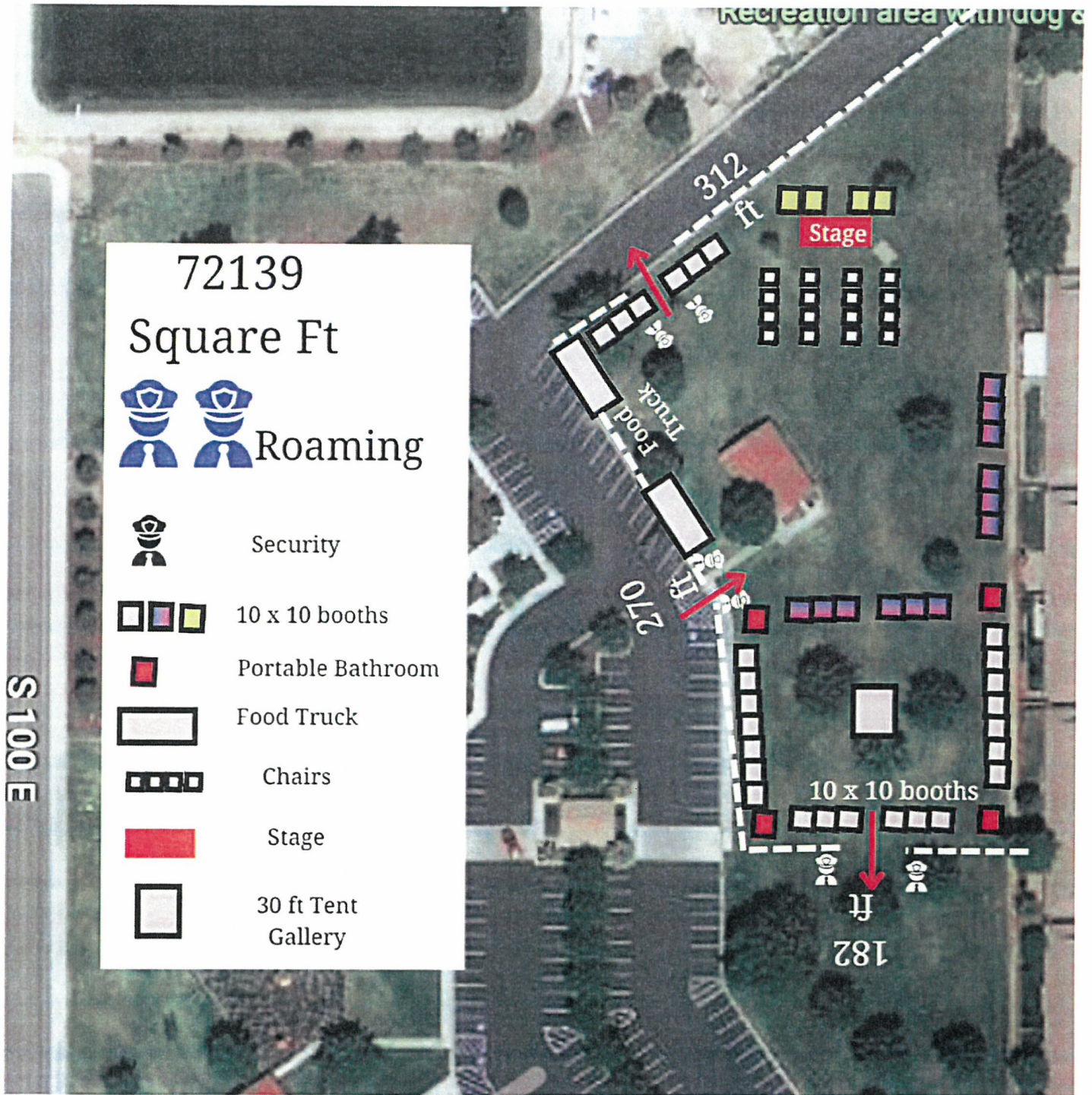
EVENT DESCRIPTION

PLEASE DESCRIBE YOUR EVENT IN DETAIL; ADD ANY ADDITIONAL INFORMATION OR PAGES.

- *Please be sure to include any elements of your event that will help with the approval of the event.*
-

The Allies & Community Drag Show festival will be an amalgamation of vendors and artists performing at Vernon Worthen Park April 28th. This festival will promote unity and community in a 4-hour festival. This event will not have any alcohol vendors, but it will have food and merchandise (T-Shirts, stickers, candles, etc). This event will also have informational booths in addition to the food and merchandise vendors. For this event we anticipate that there will be more than 300 people. There is a map attached that shows we will approximately use 47290 square feet of the south-west side of Vernon Worthen Park. We will have 8 private citizens at this event for security with two at every entrance and two roaming the event. Security will have first-aid kits and identifying vests/T-shirts which have been trained for deescalation tactics to demonstrate with protesters.

The festival will have 54 10x10 booth slots and a 20x40 stage (see detailed sit map). There will be approximately 106 utah barricades surrounding the 47290 square foot area with one ticket entrance, and two exits. Set-up will begin at 10 am and will go on until 3 p.m. where vendors will begin to set up. At 5 p.m., the festival will begin and at 6:30, the stage will be used to start a show that will have local music artists sing and performance actors perform. The show will be done by 8 p.m. which will leave an hour for patrons to roam around until it ends at 9 p.m. Take down will commence and will finish at 10 p.m.



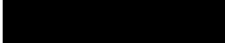
JC Snow map/layout

Date Received Vendor List 3/3/23 Permit No: _____
 Payment Received _____ Date Completed _____

SUB-LICENSE FEE(S)  **St. George**


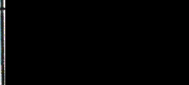
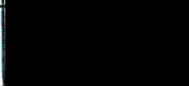
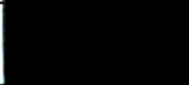
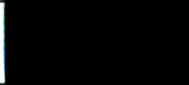
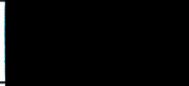
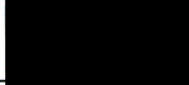
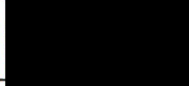

Please make check payable to: CITY OF ST. GEORGE

City of St. George Special Events Phone: 435-627-4712
 175 East 200 North E-mail: events@sgcity.org
 St. George, UT 84770

EVENT NAME: Allies & Community drag show CONTACT PHONE: 
 EVENT DATE(S): Friday, April 14th EVENT LOCATION: Vernon Worthen Park

VENDOR INFORMATION

Please provide the following information for all vendors. The sub-license fee for each vendor is \$5.00. Special Event Tax Numbers are required for each Vendor, 801-297-6303. Those Vendors selling, giving away, or preparing food on site are required to obtain approval from the Southwest Utah Public Health Department, 435-936-2580.

#	Vendor Name	Vendor Phone #	Product or Service to be offered at Event	Payment \$5.00
1	Equality Utah		Informational booth	
2	Our Family Designs		stickers, t-shirts	
3	Whisler provisions		candied popcorn	
4	Sauced Up		chips & salsa	
5	Inner Compass life		informational booth	
6	The Trash Pile		T-shirts	
7	Pride of Southern Utah		informational booth	
8	Local Charred Grill		<u>Food truck</u>	
9	<u>Circuitfit</u>		<u>Informational booth</u>	
10	<u>Simply Sae's Jewelry</u>		<u>Jewelry</u>	

Date Received 3/3/23 Permit No. _____
Police Approved _____ Date Issued _____

Approval with Comments:

SECURITY PLAN APPROVAL REQUEST FORM



6-2010-21

All questions must be answered completely or application will not be considered. Please allow TEN (10) days for approval. Together with this application, please provide a written Security Plan including names of all security personnel.

EVENT NAME: Our Allies & Community Drag Show

Event Location: Vernon Worthen Park

Type of Event: _____ Do You Expect Any Protesters? YES NO

Date of Event: Friday, April 28th, 2023 Hours of Event: 5-9 p.m.

Number of Expected Attendance: 500 Occupancy Load: _____

Name of Applicant: Mitski Avalōx

Address: [REDACTED]

Day Phone: [REDACTED] Cell/Other: _____

E-mail: mitski@sudragstars.com

- Security Personnel must be 21 years old or older;
- A Security Director must be onsite at all times with a cell phone;
- Shirts or Vests must look the same. "SECURITY" must be stated on the shirt or vest so it is visible to the public and the Police Department.

Please check applicable Security:

The following will allow for the calculation of security required. The calculations will change depending on the type of event.

<input type="checkbox"/> Police Officers (\$100/hr)	2 Police Officers per	1 to 300 People
<input type="checkbox"/> Security Officers in Uniform	3 Security Officers per	1 to 300 People
<input checked="" type="checkbox"/> Private Citizens in Security Shirts or Vests	4 Private Citizens per	1 to 300 People

Name of On-site Security Director: Ermiya Fanaeian Cell Number: [REDACTED]

E-mail: [REDACTED]

Comments:

I understand that falsifying any information on this application constitutes sufficient cause for rejection or revocation of the Special Event Permit. I also understand that the Police Department may require additional information as permitted by Ordinance, and also agree to supply the same.

Applicant Signature: Ermiya Fanaeian Date: 02/26/23

SECURITY PLAN INFORMATION

1. Please list the names of the security personnel, age, and cell phone number:

First	Last	Age	Cell Phone Number
Shawn	Wilson	[REDACTED]	[REDACTED]
Aisha	Jackson	[REDACTED]	[REDACTED]
Greg	Rud	[REDACTED]	[REDACTED]
Audrey	Rud	[REDACTED]	[REDACTED]
Seth	Johns	[REDACTED]	[REDACTED]
Ian	Southerland	[REDACTED]	[REDACTED]

8

2. Please indicate the number of security personnel that will be roaming on the premises of the event: _____.

3. Please provide a detailed Security Plan:

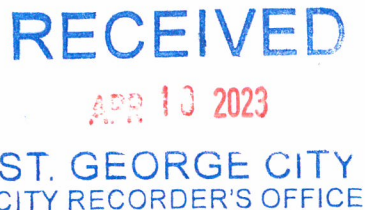
Additional Personnel: Neek Oh, 21+, 765-737-0271. Security personnel will be stationed at each entrance of the venue

Security will be wearing identifying uniforms
 & will have first-aid kits on-hand. Security
 is trained in deescalation tactics and will
 be coordinating with security director who will
 be roaming.

4. Please mark on the site plan the locations of each security person:

Please see event map.

AFFIDAVIT OF JOHN WILLIS



STATE OF UTAH)
) ss:
COUNTY OF WASHINGTON)

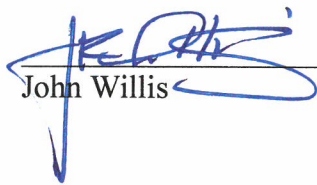
The undersigned, John Willis, being first duly sworn upon oath, deposes and states:

1. I am competent to testify and have personal knowledge of the matters stated in this affidavit. If called to testify as to the truth of the matters stated herein, I could and would competently do so.
2. I am now and, at all times relevant, have been employed by the City of St. George. I was appointed by the St. George City Council as City Manager on or about January 19, 2023. I served as the City’s Community Development Director since August 2018, and I was the Planning and Zoning Manager for four years prior to that. I also supervised Special Events. I have over 17 years of experience in land use, planning, and zoning. I previously served as the Senior Land Use and Environmental Planner for the City of Mesquite, Nevada, and the Planning Coordinator for Draper City, Utah. I earned a bachelor’s degree from the University of Utah, and a master’s degree from the University of Nebraska-Lincoln.
3. My duties are outlined in the City Code Section 1-7A-6. I am the “administrative head of government of the city under the direction and control of the mayor and city council.” I have the duty and authority “to control, order, and give directions to all heads of departments and to subordinate officers and employees of the city under [my] jurisdiction through their department heads.” See City Code Sections 1-7A-6(B).


4. On or about March 21, 2023, I met with Assistant City Manager Marc Mortensen, Special Events Coordinator Sarah Reber, City Attorney Tani Pack Downing, and Assistant City Attorney Ryan N. Dooley to discuss Special Events.
5. Discussion ensued regarding concerns from a majority of the city council regarding the special event 45-day application requirement per City Code Section 3-10-4(A) and the special event prohibition of advertising prior to obtaining a special event permit per City Code Section 3-10-4(C).
6. I directed Staff to research which, if any, special event applicants were in violation of City Code.
7. On or about March 31, 2023, a majority of the City Council indicated to Staff to strictly comply with the requirements found in City Code Section 3-10-1 et. seq and to otherwise enforce it.

FURTHER AFFIANT SAYETH NAUGHT

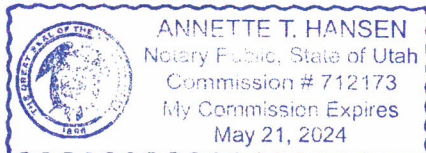
DATED: April 10, 2023


John Willis

SUBSCRIBED AND SWORN to (or affirmed) before me this 10th day of April 2023, by John Willis.


Annette Hansen

NOTARY PUBLIC



AFFIDAVIT OF RYAN N. DOOLEY

RECEIVED

APR 10 2023

ST. GEORGE CITY
CITY RECORDER'S OFFICE

STATE OF UTAH)
) ss:
COUNTY OF WASHINGTON)

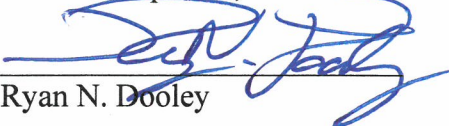
The undersigned, Ryan N. Dooley, being first duly sworn upon oath, deposes and states:

- 1) I am competent to testify and have personal knowledge of the matters stated in this affidavit. If called to testify as to the truth of the matters stated herein, I could and would competently do so.
- 2) I am now and, at all times relevant, have been employed by the City of St. George. I was hired as an Assistant City Attorney on or about June 27, 2022. I have been licensed in Utah as an Attorney and Counselor at Law since February 5, 2019. I have been licensed in Arizona as an Attorney and Counselor since October 13, 2011. I obtained a bachelor's degree from the University of Utah and a juris doctor degree from Oklahoma City University School of Law.
- 3) I have been employed in public practice beginning April 6, 2015, with the Mohave County Attorney's Office as a prosecutor, and then since September 18, 2018, with the La Paz County Attorney's Office as its Civil Deputy and later as its Chief Deputy County Attorney.
- 4) My current duties include providing legal analysis and advice to department heads and elected officials, conducting legal research and other research as needed. I also supervise the legal intern(s) in the St. George City Attorney's Office.
- 5) Jocelyn Chavez is the current legal intern; she is a senior in high school and she has not yet reached the age of majority. She began interning on or about February 14, 2023, and is scheduled to finish her internship on or about May 4, 2023.

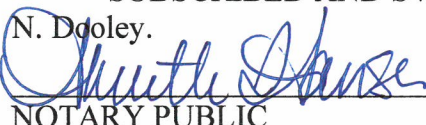
- 6) On March 21, 2023, I met with City Manager John Willis, Assistant City Manager Marc Mortensen, Special Events Coordinator Sarah Reber, and City Attorney Tani Pack Downing regarding special events applicants strictly complying with City Code. Mr. Willis directed that research be done regarding pending applicants and whether any were advertising prior to obtaining city approval or prior to a city permit being issued.
- 7) That same day I assigned Ms. Chavez this outward-facing research project.
- 8) Later that same day Ms. Chavez completed the research. Attached hereto as Exhibit A is “SE Pre-Advertising” research results and it is incorporated by reference. Several pending applications appeared to be advertising on Facebook, Instagram, or on a website prior to obtaining city approval or prior to a city permit being issued.
- 9) On or about March 31, 2023, a majority of the City Council indicated to City Attorney Tani Pack Downing and myself:
 - a) to strictly comply with the requirements found in City Code Section 3-10-1 et. seq to new events and to otherwise enforce the City Code; and
 - b) to exempt reoccurring and city sponsored events as the City Council directed staff to prepare an ordinance for the City Council to ratify this decision at the April 06, 2023, City Council meeting.

FURTHER AFFIANT SAYETH NAUGHT

DATED: April 10, 2023


Ryan N. Dooley

SUBSCRIBED AND SWORN to (or affirmed) before me this 10th day of April 2023, by Ryan N. Dooley.


NOTARY PUBLIC

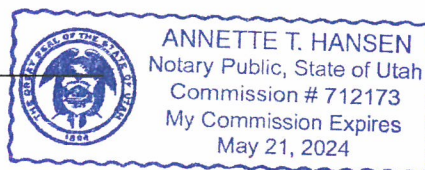


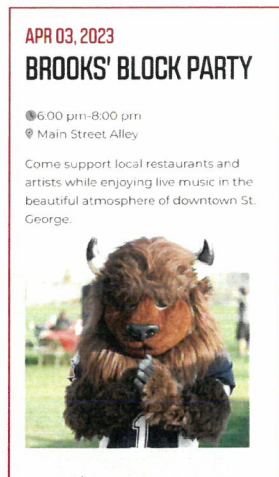
EXHIBIT A

Advertising Before Permit Approval:

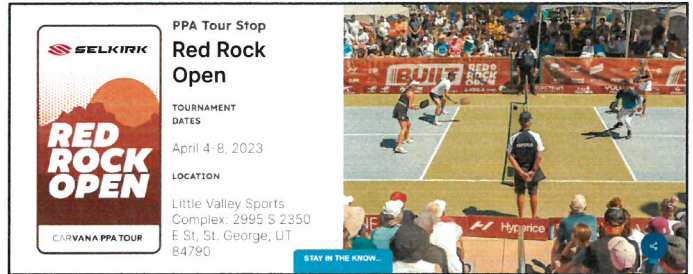
Witchy Market (Public) 3/25
(Facebook)



Brook's Block Party (Public) 4/3
(Website)



Selkirk's PPA Tour (Public) 4/7-8
(On website they indicate the 4th-8th as tournament dates)



Utah Government Finance Officer's Association 4/12-14
(Website)



Redstone Highland Games
(Website)



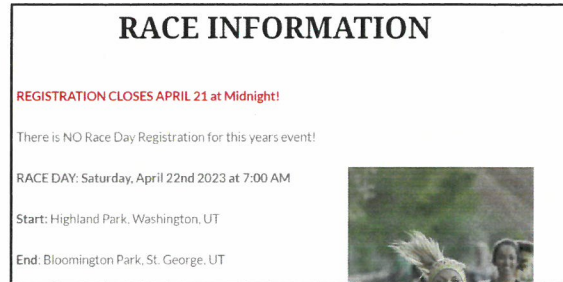
Spring Tour of St George

(Website)



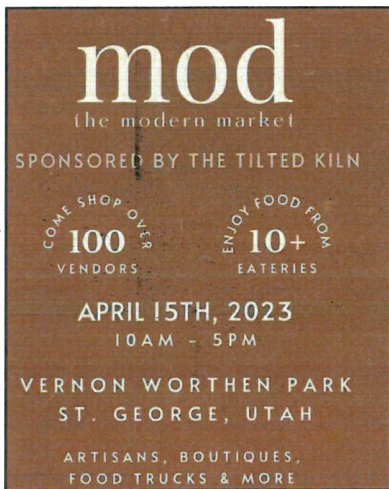
Southern Utah Half Marathon (Public) 4/22

(Website)



MOD Market (Public) 4/15


(Instagram, No advertisement for 11/4 date)



Ironman (Public) 5/6

(Website)



Hosted by Southern Utah Drag Stars 

Dates
Apr 28 5:00 pm - Apr 28 9:00 pm (GMT-06:00) Mountain Time (US & Canada)

Location
900 S 400 E, St. George, Utah 84790, United States

The Allies & Community Drag Show Festival will take place Friday April 28th in JC Snow Park from 5 p.m. to 9 p.m. We anticipate this event will have over 500 people as we have an exciting line-up of music artists and drag stars.

The festival doors will open at 5 p.m. and we will start the show at 6:30 p.m. Please review the fees attached to being a vendor/sponsor for this event.

(Website, No location announced, just date)

The biggest food-focused community event!



Taking place **October 28th, 2023**

Join your **COMMUNITY** and **CELEBRATE** the Taste of Southern Utah!

This community event will feature **restaurants, vendors, and live music**

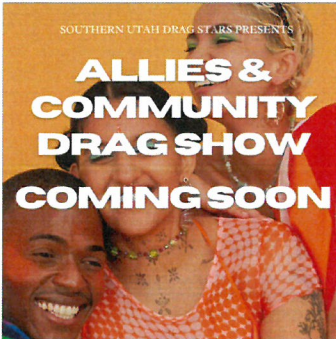
Our Allies and Community Dragon Show (Public) 4/28

Upcoming Events

SOUTHERN UTAH DRAG STARS PRESENTS

ALLIES & COMMUNITY DRAG SHOW

COMING SOON

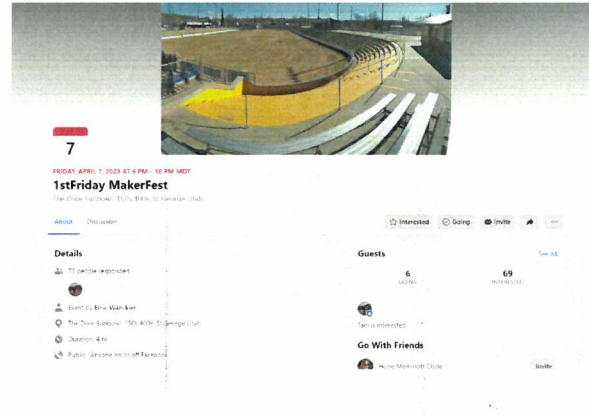


Allies & Community Drag Show

Fri, Apr 28 | Location is TBD

[Learn more](#)

(Website)



1st Friday MakerFest

7

7:00 PM - 10:00 PM

Public

6 guests

69 interested

Taste of Southern Utah

1st Friday MakerFest

Events NOT Advertising Before Permit Approval:

Ken Garff RV Sales 4/3-10 & 5/8-15

ULCT BBQ 4/20

Mutts At The Mall 4/29

Pride 2023

AFFIDAVIT OF SARAH REBER

RECEIVED
APR 10 2023
ST. GEORGE CITY
CITY RECORDER'S OFFICE

STATE OF UTAH)
) ss:
COUNTY OF WASHINGTON)


The undersigned, Sarah Reber, being first duly sworn upon oath, deposes and states:

- 1) I am competent to testify and have personal knowledge of the matters stated in this affidavit. If called to testify as to the truth of the matters stated herein, I could and would competently do so.
- 2) I am now and, at all times relevant, have been employed by the City of St. George. I was hired as the Special Events Coordinator on or about June 27, 2022.
- 3) My current duties include accepting and processing special event applications, answering questions relating to permitting procedures and ensuring that all requirements are met prior to city approval of the special event is granted and a special event permit is issued.
- 4) On or about March 21, 2023, I met with City Manager John Willis, Assistant City Manager Marc Mortensen, City Attorney Tani Pack Downing, and Assistant City Attorney Ryan N. Dooley where we discussed special events. Concerns were raised regarding the application process and advertising special events prior to being permitted.
- 5) That same day I reviewed the "SE Pre-Advertising" research document compiled by legal intern Jocelyn Chavez.
- 6) On or about March 31, 2023, I was informed about the need to strictly comply with the requirements found in the City Code regarding special event applications. It was clear that several special event applicants were advertising prior to city approval of the special event was granted and prior to a special event permit was issued.

- 7) It was communicated to me by Tani Pack Downing and Ryan N. Dooley that a majority of the City Council wanted staff:
 - a) to strictly comply with the requirements found in City Code Section 3-10-1 et. seq to new events and to otherwise enforce the City Code; and
 - b) to exempt reoccurring and city sponsored events as the City Council directed staff to prepare an ordinance for the City Council to ratify this decision at the April 06, 2023, City Council meeting.
- 8) I therefore denied three (3) pending new special event permit applications pursuant to City Code Section 3-10-8(A) (Grounds of Denial) for violating City Code Section 3-10-4(C): *Advertising*: No advertising of a special event shall be permitted until city approval of the special event is granted, and a special event permit is issued.
- 9) At no time did I authorize, communicate, or indicate to any pending special event applicant that the applicant was allowed, authorized, or given permission to advertise prior to the special event permit being granted and prior to the special event permit being issued. I have searched my emails and found no such correspondence or communication. I do not recall any in person conversation, nor any other communication by text, letter, or 3rd party regarding advertising approval.

FURTHER AFFIANT SAYETH NAUGHT

DATED: April 10, 2023


 Sarah Reber

SUBSCRIBED AND SWORN to (or affirmed) before me this 10th day of April 2023, by Sarah Reber.



NOTARY PUBLIC

