
COUNTY WATER DISTRICT OF BILLINGS HEIGHTS

Board of Directors Meeting Agenda

The meeting is open to any interested member of the public. Agendas are prepared for the meetings; please request an agenda from the Board Recording Secretary Pam Ellis, pamelliscwdbh@gmail.com and are available at <https://www.yellowstonecountynews.com/county-water-district-of-billings-heights/> and <https://heightswaterdistrict.com/agendas-and-minutes/>. Supplemental documents provided to the Board and referenced in the agenda may be obtained from Board Recording Secretary Pam Ellis, pamelliscwdbh@gmail.com

Location: Board Room, County Water District of Billings Heights 1540 Popelka Dr.

Date: January 19, 2022

Time: 6:00 p.m.

CALL MEETING TO ORDER: President Ming Cabrera

WELCOME AND INTRODUCTIONS

PRESIDENT'S REMARKS: Ming Cabrera

During the course of the meeting the Public may be heard before a vote is cast by the Board. The President will acknowledge the Public once the motion has been made and discussed by Board for their input. The President will recognize speakers who raise their hand. Once recognized, the speaker should move to the side of the board table so comments can be heard, identify themselves by name, and limit their comments to two minutes. Each speaker will have one opportunity to speak on any agenda item.

I. PUBLIC COMMENT on "NON-PUBLIC HEARING" Agenda Items

1. Any member of the Public may be heard on any subject that is not on the Agenda.
2. The board will not take action on these items at this time but may choose to add an item to the next meeting's Agenda for discussion.

II. CONSENT AGENDA (# supporting documents available at the dropbox link above)

1. Minutes of the December 15, 2021 Meeting
2. December Prepaid bills for approval
3. December Bills for Approval
4. December Bank Statements: First Interstate Bank

5. Stifel Statement December
6. Profit and Loss Statement – December 2020 and December 2021
7. Reimburse Laura Drager for expenses incurred posting the job notice for General Manager on Indeed and LinkedIn LinkedIn of \$190.0 and January invoice for Indeed \$229.41. Please include these amounts in payment to me for reimbursement as well as the \$968.35 for Indeed for December posting. Total - \$1,387.76

Recommended Motion I move to approve the consent agenda.

III. INTERIM GENERAL MANAGER REPORT LARRY BREWSTER

1. CIP UPDATE REVIEW OF RECOMMENDED PROJECTS AND PRIORITIES IDENTIFIED, NEXT STEPS
(See documents CIP 1, 2 & 3)
2. WAGE STUDY-INFORMAL RECOMMENDATIONS FROM 2000 WAGE STUDY.
3. PERSONNEL RECOMMENDATIONS.
4. MEETING OPERATION
 - a) Decorum
 - b) Communications with staff
5. Annexation of Owen Property: AMENDED PLAT OF SPRING HILLS ACREAGE TRACTS, SECOND FILING
6. BDS account management page including: # emails, # phone numbers, # of ratepayers requesting bills be emailed (monthly report)
7. DPHHS Low Income Home Water Assistance Program
 - a) How many ratepayers have requested information about enrolling in the program?
 - b) How will the district communicate to ratepayers so they know the program is available (posting information on website; including on the water bills?)

II. ASSISTANT GENERAL MANAGER REPORT (Not available—Peyton is ill)

III. OLD BUSINESS

1. Response to Cause No.D V 2 1 0 1 4 9 filed by Plaintiffs JEFF ENGEL, BRANDON HURST, DENNIS COOK, and TOM ZURBUCHEN against the County Water District of Billings Heights in MONTANA THIRTEENTH JUDICIAL DISTRICT COURT YELLOWSTONE COUNTY on December 10, 2021 (see pp 10—27)
2. ANSWER TO COUNTERCLAIM (see pp 28-33)
3. Follow-up Discussion with Andrew Rheem, Raftelis from December 15, 2021 Board Meeting
4. Water System Improvement Project to provide upgrades to the District's potable water reservoirs

- a) Pre-Bid Conference held at the Ox Bow Reservoir site, 3500 Hawthorne Lane, Billings MT on Wednesday, January 12th, 2022 at 1:30 PM
- b) Bids were publicly opened and announced by the County Water District of Billings Heights at Three O'clock Local Time on Wednesday, January 19th, 2022

5. ARPA Applications due on January 14, 2022 Discussion

IV. NEW BUSINESS

V. BOARD REPORTS

- 1. PRESIDENT’S REPORT: Ming Cabrera
- 2. FINANCE COMMITTEE: Laura Drager
 - a) Treasurer’s Summary Report as of December 31, 2021

County Water District Billings Heights Treasurer's Summary Report as of 21-Dec-21				
	30-Sep-21	31-Oct-21	30-Nov-21	31-Dec-21
Meters				
Previous total meter count	5,917	5,917	5884	5881
Residential	5,461	5,455	5436	5481
Commercial	456	429	401	400
New Residential	10	4	9	5
Total # Meters	5,917	5,884		5881
		*Irrigation meters offline		
Checking				
FIB Gross Income Account	\$1,217,953.82	\$1,176,986.93	\$1,276,204.33	\$1,003,872.97
FIB Operational & Maintenance	\$24,768.61	\$28,604.91	\$38,498.06	\$33,902.05
FIB Payroll Account	\$3,568.44	\$24,414.15	\$4,480.16	\$3,312.29
Total Checking	\$1,246,290.87	\$1,230,005.99	\$1,319,182.55	\$1,041,087.31
				.
Investments				
Stifel - Cash & Equivalent	\$473,100.00	\$1,153,146.99	\$1,410,231.76	\$3,458,578.84
Stifel - Fixed Income CD's	\$8,448,932.00	\$7,747,956.58	\$7,481,322.97	\$5,431,037.86
Total Stifel Investments	\$8,922,032.00	\$8,901,103.57	\$8,891,554.73	\$8,889,616.70
First Interstate Bank Savings		\$250,926.03	\$250,929.02	\$250,933.354

Yellowstone Bank Reserve CD	\$250,000.00	\$205,267.50	\$205,267.50	\$205,267.50
Total Investments	\$9,172,032.00	\$9,106,371.07	\$9,096,822.23	\$9,094,884.20
Total Cash Position	\$10,418,322.87	\$10,336,377.06	\$10,416,004.78	\$10,135,971.51

- b) AZ Audit Update
- c) Insurance Update

Background: In speaking with other General Manager’s of water districts in Montana, Laura Drager discovered the one area we are lacking in employee benefits is our disability insurance. Eric Allen, the Insurance Specialist with Allen & Associates Insurance wrote: “The rates look really good as well. \$216.66/month for Short Term Disability and \$280.21/month for Long Term Disability. Looks like they did a 60% benefit up to \$6K/month on Long Term and 60% up to \$1K/week for Short Term.”

Recommended motion: Having conducted a public hearing, considered written and spoken public testimony, I move that the Board approve Resolution 011-21 to provide short-term disability insurance with Guardian Insurance for 8 employees for a monthly premium of \$216.66; and an annual premium of \$2,599.92.

Recommended motion: Having conducted a public hearing, considered written and spoken public testimony, I move that the Board approve Resolution 012-21 to provide long-term disability insurance with Guardian Insurance for 8 employees for a monthly premium of \$280.21; and an annual premium of \$ \$3,362.52

3. BYLAWS AND GOVERNANCE COMMITTEE: Pam Ellis

- a) Report from Ming Cabrera, Laura Drager, Pam Ellis regarding Posting the Notice to Hire a General Manager and updates on responses to date. The committee met with Larry Brewster on Monday, January 10, 2022 to review the applications received to date and develop procedures for the hiring process. The Hiring Committee worked with Interim General Mana, Larry Brewster, to establish the process including:
 - i) Larry Brewster reviewed all the applications submitted to identify potential finalists
 - ii) The Hiring Committee members reviewed applications to consider additions or removal from a list of finalists
 - iii) The applications are available for Board members to review prior to noon on January 21st to make recommendations for addition or removal from the finalist list
 - iv) The Interim General Manager Larry Brewster will conduct an initial background check to affirm employment history and business references:

- 1) Employment verification
 - (a) Dates of employment:
 - (b) Job Title:
 - (c) Job Description:
 - (d) Salary:
 - (e) Eligible for rehire? Yes/No
 - 2) Checking business references
 - (a) How do you know _____?
 - (b) (To ascertain type of relationship, i.e. co-worker, supervisor, etc.) How long have you known _____?
 - (c) What can you tell me about them?
 - (d) What has been your experience of them in your setting?
 - (e) (The setting will vary based on their relationship type. Examples include: business, department, etc.)
 - (f) How did they contribute to your company's work effort?
 - (g) How did they detract from the work effort?
 - v) Executive Board Meeting to review applications and consider adding or subtracting candidates January 24 , 2022 3:00 pm
 - vi) The full board will interview 4-5 finalists in person or via zoom (9:00 am—6:30 pm; 8:30 pm if we interview 5 candidates) Saturday, January 29, 2022. The Interim General Manager will ask the prepared questions. Board members may ask follow-up questions if the applicants answers need clarification.
 - 1) QUESTIONS Board members can submit questions to the Hiring Committee; a draft has been prepared
 - 2) Each candidate will be asked the same questions.
 - 3) Board members may ask follow-up questions if the applicants answers need clarification.
 - 4) Each board member will evaluate the applicants in writing prior to a final vote using a form that weights the questions and calculates a point total.
 - 5) The public to observe interviews with the finalists and may comment prior to the board making a final decision.
 - vii) The Board will recommend a final candidate at a special board meeting on Wednesday, February 2 @ 6:00 pm. Prior to the final vote, the public will be allowed to observe and comment. (NOTE Given that the District failed to advertise the General Manager position with AAWA as directed by the board on November 29 and verified on December 15th, the Board may choose to extend the posting and interview process)
 - viii) Verification of educational certifications and official education transcripts, pass a medical exam including a drug and alcohol screen, and a complete background check prior to the Board approving an Employment Contract.
 - ix) A verbal offer will be made to the Board's candidate by the Board President.
 - x) The Board attorney, Mark Noennig, will work with the candidate and Board to draft a contract for final approval by the Board at a public meeting.
 - xi) The Interim General Manager will prepare letters of regret to the other candidates to be signed by the Board President.
4. Website Update: We have begun to upload minutes, agendas, resolutions, and policies. We will need to transfer the BCS software to the new site

- i) Consider the advantages of not charging a fee for people who pay with credit card
- ii) Can we provide the option for ratepayers to opt-out of receiving a mailed bill?
- iii) Can we provide an option for ratepayers to pay monthly with direct debit from their checking account by providing routing and account numbers without requiring ratepayers to sign up for automatic payment?

Pam Ellis has uploaded all the available minutes, agendas, policies, audit reports and policies to dropbox. She met with the designer for the board management software. A second meeting is scheduled for 3 pm on January 20th.

Recommended Motion:

5. Safety: Jeff Engel (from the December 15, 2021 agenda)

Jeff Engel sent the Board via email a reference to a book related to the Safety Committee. Jeff hadn't reviewed and discussed with Clay McCaffree when he filed his report for the November Board mtg. The field manual is a standard book for utilities and contains 52 weekly subjects for safety meetings. Exceptions to this order of events would be any specific subject matter that may come about as a result of a specific daily activity or emergency. Possibly office staff could make copies so all can see some of the safety meeting procedures currently in place by field staff.

- *Let's Talk Safety: A Series of 52 Talks on Common Utility Safety Practices 2009 AAWA*
- *Week 49: Hypothermia A Winter Safety Hazard, p 113*

At the November 29, 2021 Board meeting Dave Graves asked what the staff recommends to help with the safety committee. The response is that the record speaks for itself. Weekly meetings keep us up to date and training on the job site.

Josh Simpson recommended that the staff submit a quarterly report to the Board prepared by Jeff Engel.

MOTION: Ming Cabrera moved that the Board Safety Chair prepare a quarterly safety report in March, June, September and December.

SECOND David Graves

UNANIMOUS APPROVAL

VI. ANNOUNCEMENTS

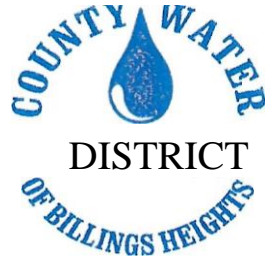
Friday, January 21, noon	Board members may individually review the applications for General Manager
Monday, January 24, 3:00 pm	Executive Board Meeting to select 4-5 candidates to interview
Saturday, January 29 th , 9:00 am—6:30 pm	Interview 4-5 finalists for General Manager
Wednesday, February 2 nd , 6:00 pm	Special Board Meeting: Hire General Manager

Wednesday, February 16 th , 6:00 pm	February Board meeting
Wednesday, March 16 th , 6:00 pm	March Board Meeting
**Wednesday, April 13 th , 6:00 pm	April Board Meeting (Note: 2 nd Wednesday)
Wednesday, May 18 th , 6:00 pm	May Board Meeting
Wednesday, June 15 th , 6:00 pm	June Board Meeting
Wednesday, July 20 th , 6:00 pm	July Board Meeting
Wednesday, August 17 th , 6:00 pm	August Board Meeting
**Wednesday, September 14 th , 6:00 pm	September Board Meeting (Note: 2 nd Wednesday)
Wednesday, October 19 th , 6:00 pm	October Board Meeting
Wednesday, November 16 th , 6:00 pm	November Board Meeting
Wednesday, December 21 st , 6:00 pm	December Board Meeting

VII. ITEMS TO BE CONSIDERED AT FUTURE BOARD MEETINGS

Note: No action can be taken on items that were not on the agenda.

VIII. ADJOURN



Resolution 012-21 to Authorize purchase of Long-Term Disability Insurance through Guardian Insurance

WHEREAS, the County Water District of Billings Height Board consider written and spoken testimony at a meeting of the County Water District of Billings Heights Water Board on January 19, 2022.

The Board authorized signing the contract to provide long-term disability insurance with Guardian Insurance for 8 employees premium of \$280.21; and an annual premium of \$3,362.52.

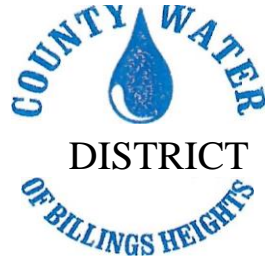
That, the President of the County Water District of Billings Heights or his designee, sign the resolution and Guardian Long-Term Disability contract on behalf of the board.

Signed: _____

Ming Cabrera, President

Date: January 19, 2022

Attested: _____



Resolution 013-21 to Authorize a contract for Justin Stark and the Hendrickson Law Firm to represent the District in responding to Cause No.D V 2 1 0 1 4 9 filed by Plaintiffs JEFF ENGEL, BRANDON HURST, DENNIS COOK, and TOM ZURBUCHEN against the County Water District of Billings Heights in MONTANA THIRTEENTH JUDICIAL DISTRICT COURT YELLOWSTONE COUNTY on January 19, 2022

WHEREAS, the County Water District of Billings Height Board consider written and spoken testimony at a meeting of the County Water District of Billings Heights Water Board on December 15, 2021.

The Board authorized signing the contract to hire Justin Stark and the Hendrickson Law Firm of the HENDRICKSON LAW FIRM, P.C. 208 NORTH BROADWAY, SUITE 324 P.O. BOX 2502 BILLINGS, MT 59103-2502 @ an hourly rate of \$185 per hour

That, the President of the County Water District of Billings Heights, sign the resolution and an employment agreement on behalf of the board.

Signed: _____

Ming Cabrera, President

Date: January 19, 2022

Attested: _____

FILED

12/30/2021

Terry Halpin

CLERK

Yellowstone County District Court

STATE OF MONTANA

By: Robyn Schierholt

DV-56-2021-0001494-OC

Todd, Gregory R.

3.00

MARK E. NOENNIG
JUSTIN STARK
HENDRICKSON LAW FIRM, P.C.
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Billings, MT 59103-2502
Telephone: (406) 245-6238
Email: justin@hendricksonlawmt.com
Attorneys for Defendant
County Water District of Billings Heights

MONTANA THIRTEENTH JUDICIAL DISTRICT COURT, YELLOWSTONE COUNTY

JEFF ENGEL, BRANDON HURST,) Cause No. DV 21-1494
DENNIS COOK, and TOM ZURBUCHEN,)
) Judge: GREGORY R. TODD
Plaintiff,)
)
v.)
)
COUNTY WATER DISTRICT OF) ANSWER
BILLINGS HEIGHTS,)
)
Defendant.)

The Defendant, County Water District of Billings Heights (the "District"), by and through counsel of record, hereby answers the Complaint of the plaintiffs, Jeff Engel, Brandon Hurst, Dennis Cook, and Tom Zurbuchen, as follows:

ANSWER

1. Answering paragraph 1, the District admits the allegation.
2. Answering paragraph 2, the District admits the allegation.
3. Answering paragraph 3, the District admits the allegation.
4. Answering paragraph 4, the District admits the allegation.
5. Answering paragraph 5, the District denies the allegation.
6. Answering paragraph 6, the District denies the allegation.
7. Answering paragraph 7, the District denies the allegation.
8. The District denies any allegations of the Complaint not specified above.

paragraphs of this Answer.

FIRST AFFIRMATIVE DEFENSE AND GENERAL ALLEGATIONS

9. A meeting of the board of directors of the District occurred on November 29, 2021 (the “November 29th Meeting”).
10. On November 22, 2021, notice of the November 29th Meeting was provided to the District’s directors and staff of the District by a memorandum from four of the District’s directors. A copy of this memorandum is attached hereto and incorporated herein as Exhibit A.
11. The memorandum dated November 22, 2021, directed the District’s staff to post notice on the District’s website.
12. Upon information and belief, one or more of the Plaintiffs encouraged the District’s staff to not post notice of the November 29th Meeting on the District’s website.
13. Upon information and belief, notice of the November 29th Meeting was provided by posting to one or more facebook pages.
14. On November 27, 2021, and November 28, 2021, a plaintiff, Tom Zurbuchen, emailed with directors of the District regarding, among other things, the District’s Bylaws and public participation in District meetings.
15. On November 28, 2021, notice of the November 29th Meeting was provided by email to approximately 5,000 recipients of the Big Sky Business Journal Hot Sheet. A copy of this post entitled “Water District Sets Special Meeting” is attached hereto and incorporated herein as Exhibit B (article dated November 29th, but emailed November 28th).
16. All Plaintiffs had notice of the November 29th Meeting.
17. The November 29th Meeting implemented the District’s procedures for permitting and encouraging the public to participate in District decisions that are of significant interest to the public.
18. The November 29th Meeting had a quorum of the District’s directors in attendance.
19. Three of the plaintiffs who are District Directors, i.e., Jeff Engel, Brandon Hurst, and Dennis Cook, did

not attend the November 29th Meeting.

20. The November 29th Meeting was open to the public.
21. The November 29th Meeting was at no time a closed meeting.
22. The November 29th Meeting allowed and accepted public comment on agenda items.
23. A plaintiff, Tom Zurbuchen, attended the November 29th Meeting and spoke publicly during the Meeting.
24. At the November 29th Meeting, Tom Zurbuchen was given a copy of the agenda for the November 29th Meeting.
25. The actions of the District at the November 29th Meeting comply with Montana's open meeting law, Mont. Code Ann. § 2-3-203.
26. The actions of the District at the November 29th Meeting are valid.
27. On November 30, 2021, notice of the December 15, 2021, meeting was emailed to Big Sky Business Journal and Yellowstone County News.
28. Upon information and belief, notice of the December 15, 2021, meeting appeared in the Big Sky Business Journal.
29. Notice of the December 15, 2021, meeting appeared in the Yellowstone County News on December 3, 2021, and again on December 10, 2021. A copy of the Affidavit of Publication is attached hereto and incorporated herein as Exhibit C.
30. On December 11, 2021, December 12, 2021, December 14, 2021, and December 15, 2021, notice of the December 15, 2021, meeting was provided on the Heights Task Force facebook page. A copy of those posts are attached hereto and incorporated herein as Exhibit D.
31. On December 13, 2021, notice of the December 15th meeting was emailed to Mr. Zurbuchen and District directors, along with the agenda and documents for the December 15th meeting. The notice and agenda including a list of all November 29th Meeting decisions to be heard again at the December 15th meeting. This notice was emailed at least 48 hours before the December 15th Meeting began. A copy of the email

and the notice is attached hereto and incorporated herein as Exhibit E.

32. A meeting of the board of directors of the District occurred on December 15, 2021 (the “December 15th Meeting”).
33. All Plaintiffs had notice of the December 15th Meeting.
34. The December 15th Meeting implemented the District’s procedures for permitting and encouraging the public to participate in District decisions that are of significant interest to the public.
35. The December 15th Meeting had a quorum of the District’s directors in attendance.
36. The three plaintiffs who are District Directors, i.e., Jeff Engel, Brandon Hurst, and Dennis Cook, did not attend the December 15th Meeting.
37. The December 15th Meeting was open to the public.
38. The December 15th Meeting was at no time a closed meeting.
39. The December 15th Meeting allowed and accepted public comment on agenda items. Copies of the agenda and all attached documents were available to all who attended.
40. A plaintiff, Tom Zurbuchen, attended the December 15th Meeting and spoke publicly during the meeting.
41. At the December 15th Meeting, Tom Zurbuchen was given a copy of the agenda for the December 15th Meeting.
42. On December 20, 2021, the Yellowstone County News published Mr. Zurbuchen’s letter to the Editor, which letter acknowledges that Mr. Zurbuchen attended the December 15th Meeting, participated in the December 15th Meeting, and inspected a copy of the agenda for the December 15th Meeting during the December 15th Meeting.
43. The actions of the District at the December 15th Meeting comply with Montana’s open meeting law, Mont. Code Ann. § 2-3-203.
44. The actions of the District at the December 15th Meeting are valid.

SECOND AFFIRMATIVE DEFENSE

(Moot)

45. The District repleads and incorporates by this reference paragraphs 9 through 44 of the First Affirmative Defense and General Allegations in this Answer.
46. On December 15, 2021, the District held a meeting of the Board of Directors that included all the items from the November 29th Meeting's agenda. Notice of the December 15th Meeting was given to the Plaintiffs and the public in advance of the meeting. At the December Meeting, the District's decisions at the November 29th Meeting were ratified, after public input, and the District's actions at the November 29th Meeting were properly adopted anew. Accordingly, Plaintiffs' claims of the invalidity of the November 29th Meeting are moot. *See Zunski v. Frenchtown Rural Fire Department Board of Trustees*, 2013 MT 258, ¶¶ 15 – 17 (discussing Montana's open meeting law and determining that a subsequent meeting "remedied any earlier violations" and the subsequent meeting remedy "rendered moot any actual controversies about the actions taken" at the prior meeting).

THIRD AFFIRMATIVE DEFENSE

(Official Act and Decision)

47. The District repleads and incorporates by this reference paragraphs 9 through 44 of the First Affirmative Defense and General Allegations in this Answer.
48. The actions of District at the November 29th Meeting were legally done, and the decisions of the Board of District were properly made at the November 29th Meeting.

FOURTH AFFIRMATIVE DEFENSE

(Unclean Hands)

49. The District repleads and incorporates by this reference paragraphs 9 through 44 of the First Affirmative Defense and General Allegations in this Answer.
50. Upon information and belief, one or more of the Plaintiffs encouraged staff members at the District to refrain from giving notice of the November 29th Meeting according to routine procedures used for prior meetings, including without limitation that the notice not be published on the District's website.

Accordingly, Plaintiffs' claims should be dismissed for the reason of the unclean hands of one or more of the Plaintiffs.

FIFTH AFFIRMATIVE DEFENSE
(Failure to State a Claim Upon Which Relief Can Be Granted)

51. The District repleads and incorporates by this reference paragraphs 9 through 44 of the First Affirmative Defense and General Allegations in this Answer.
52. Plaintiffs fail to state a claim upon which relief can be granted.

COUNTERCLAIM
(DECLARATORY RELIEF)

The Defendant, County Water District of Billings Heights (the "District"), by and through counsel of record, hereby alleges and counterclaims as follows:

1. The District repleads and incorporates by this reference paragraphs 1 through 36 of the First Affirmative Defense and General Allegations in this Answer.
2. The November 29th Meeting of the board of directors of the District was held in conformance with the law, including Mont. Code Ann. § 2-3-203.
3. The District is entitled to a declaration under Title 27, Chapter 8 of the Montana Code that the actions taken by the District on November 29, 2021 were valid.
4. In the alternative, District is entitled to a declaration that the actions taken by the District on December 15, 2021, rendered moot any claim of invalidity of the November 29, 2021 actions or decisions of the District.
5. The District is entitled under Mont. Code Ann. 27-8-311 and 27-8-313 (costs and supplemental relief under the Uniform Declaratory Judgments Act) to recover from Plaintiffs, jointly and severally, the attorney fees incurred by the District in the above-captioned case.

PRAYER FOR RELIEF

WHEREFORE, the defendant, County Water District of Billings Heights (the "District") prays for Judgment in its favor and against the Plaintiffs, Jeff Engel, Brandon Hurst, Dennis Cook, and Tom Zurbuchen, jointly and severally, as follows:

1. In the District's favor on all claims contained in the Complaint;
2. That Plaintiffs take nothing by way of their Complaint;
3. On its counterclaim against Plaintiffs for a declaration that actions taken by District on November 29, 2021, were valid or, in the alternative, for a declaration that the actions taken by the District on December 15, 2021, rendered moot any claim of invalidity of the November 29, 2021 actions of the District;
4. Against Plaintiffs, jointly and severally, for the District's attorney fees;
5. Against Plaintiffs, jointly and severally, for the District's costs; and
6. For any further or other relief to which the District may be entitled.

DATED this 30th day of December, 2021.

HENDRICKSON LAW FIRM, P.C.
Attorney for Defendant
County Water District of Billings Heights

By: 
Justin Stark

November 22, 2022

TO: Board of Directors of the County Water District of Billings Heights

CC: Duke Nieskens and Peyton Brookshire

FROM: Ming Cabrera, Laura Drager, Pam Ellis, David Grayes *MA*

RE: Notice of Special Board Meeting

County Water Board of Billings Heights

November 29, 2021 2:00 pm Board Room

In 1957, the Montana Legislature passed the "County Water District Act," sections 16-4501 to 16-4534, R.C.M. 1947, which permits the residents of an area such as Billings Heights to create a district for the purpose of building, operating, and maintaining their own central water supply and distribution system. Pursuant to the provisions of the afore-mentioned Act, the Water District was established. Title 7, Chapter 13, Section 2203 of the Montana Code Annotated ("MCA") authorizes the formation and incorporation of county sewer and water districts pursuant to the requirements of the remainder of Parts 22 and 23 of the same Title and Chapter. The County Water District of Billings Heights ("District") was formed by mail ballot election-voted by the residents and landowners within the designated boundaries of the District located in Billings, Montana and duly conducted in accordance with MCA §7-13-2208(2) on August 26, 1958. A Certificate of Incorporation for the District was thereafter issued by the Montana Secretary of State on August 29, 1958.

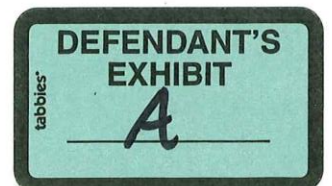
Bylaws written in 1956 have no relevance to the current board. Given that the board has not adopted bylaws in 63 years, we are governed by Montana statute. MCA 7-13-2232. Composition of board of directors specifies that CWDBH has seven board board members.

MCA 7-13-2274. Conduct of business, subsection (2) A majority of the board constitutes a quorum for the transaction of business. Four of our seven board members may develop an agenda for a meeting, notice the meeting, and conduct business.

We hereby give notice of our intention to notice a public meeting and conduct business. The staff is directed to post notice of the meeting on the website. Minutes will be kept and items supported by the majority of the board will constitute a legal board decision.

The General Manager and Assistant Manager are directed to attend the meeting.

Ming Cabrera
Laura Drager
David Grayes
Pamela Q. Ellis



HOT SHEET

November 29, 2021



Medical Workers Rally

Hundreds of medical workers gathered on Sunday afternoon at 24th Street and King Avenue to support health care workers and other employees of health care facilities who are being threatened with the loss of their jobs if they do not get vaccinated for COVID-19. Medical providers which depend upon Medicare and Medicaid reimbursements from the government are being required by the government to make sure all employees are vaccinated or lose support from those programs. They, in turn, are forcing employees to get vaccinated or lose their jobs by Dec. 5.

Calling themselves the Big Sky Liberty Alliance, workers recently formed the organization to provide support for people who, "because of the shaming, are being pressured into do something they didn't want to do," explained an organizer, Corinne Hammond. Hammond said that in announcing plans on facebook for the rally they were surprised that groups in nine other Montana towns announced intentions to join the public awareness effort. Men, women and children lined King Avenue, waving American flags and holding signs advocating for "Choice not Force." "There needs to be informed consent, not forced coercion," said Hammond. Passing vehicles honked incessantly. Hospitals in Billings have reported that 35 to 40 percent of staff are not vaccinated. Rallies were also held in Bozeman, Glendive, Great Falls, Hamilton, Helena, Kalispell, Miles City, Missoula, and Sidney.

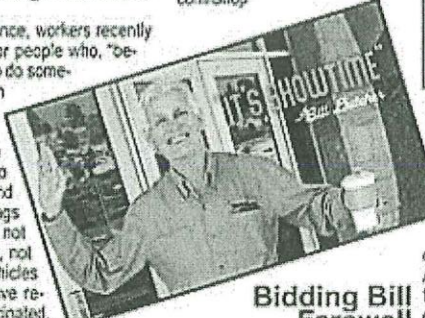
GROWN LOCAL
Stockman Bank
Montana's Brand of Banking

Weather

M	T	W	T	F	S	S	M
57	55	66	66	41	46	34	33

Shop Local & Made in Montana

Besides shopping local for Christmas, consider shopping Montana-made, suggests the Montana Small Business Administration (SBA). Entrepreneurs and small business owners are at the heart of Montana's economy, as 99.3% of all Montana businesses are small businesses. The Made in Montana program was created in 1984 to provide a unique identity to value-added products made and/or grown in Montana. The program has multiple components including Made in Montana, Grown in Montana, Native American Made in Montana, and Taste our Place program promoting Montana businesses that focus on using Montana ingredients in ready-to-consume food and beverages. Find Made in Montana products here: <http://www.MadeInMontanaUSA.com/Shop>



Bidding Bill Farewell

A reception will be held on December 10, 4-7 pm at the Billings Hotel and Convention Center to commemorate 40 years of service to MetraPark by Manager Bill Dutcher who is retiring on Dec. 31, 2021. The event will feature snacks and a cash bar, as well as some surprises for Dutcher, according to Ray Massie, MetraPark's marketing and sales manager.

EVENTS

- Dec 2 - 4 - Festival of Trees - Metra
- Dec 18 - Chase Hawks Memorial Rodeo
- Dec 25 - Christmas Day
- Dec 31 - New Years Eve
- Jan 1 - New Years Day

Building Permits

- REI Big Sky LLC, 3123 3rd Ave S, Roofing and Siding, \$32,050
- City Of Billings, 810 Airport Rd, Roofing, \$9,760
- Hanser Capital Holdings LLC, 4430 Altay Dr, Footing/Foundation, \$458,762
- DSS LLC, 1410 38th St W, New Other, \$150,000
- MLZ, LLP, 180 S 32nd St W, Remodel, \$180,000
- Elevation Church Billings, Inc, 711 4th Ave N, Remodel, \$40,000
- Dwight Deckert, 1411 38th St W, Remodel, \$6,768
- Western Security Bank, 2401 Grand Ave, Remodel, \$115,525

Water District Sets Special Meeting

Following email threats to a board member and continued discord among board members, the Heights Water District Board failed to have a quorum at their monthly meeting. A special meeting has been set for today (Monday) at 2 pm by a quorum of board members while others are opposed to meeting.

COLDWELL BANKER COMMERCIAL
CBS
406 656-2001
Visit our website for commercial listings.

DEFENDANT'S EXHIBIT
tabbies®
B

Affidavit of Publication

STATE OF MONTANA

County of Yellowstone

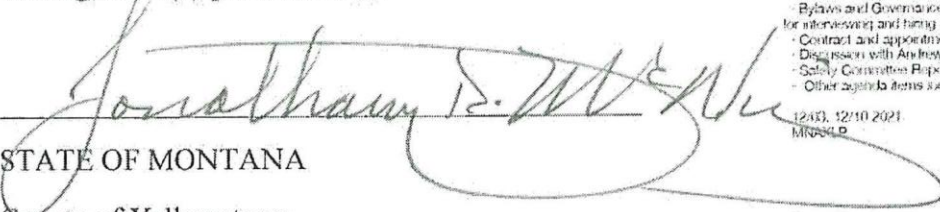
Jonathan McNiven

Being duly sworn, deposes and says:

That he is the Legal Advertising Clerk of Yellowstone County News, a newspaper of general circulation published weekly in the town of Huntley, in the County of Yellowstone, State of Montana, and that the (4) folio Legal Notice of Meeting, a true copy of which is hereto Included, was published in said newspaper on the following dates:

December 3, 2021; December 10, 2021;

making in all (2) publication(s).


STATE OF MONTANA
County of Yellowstone

On this 10th day of December 2021, before me, the undersigned, a Notary Public for the State of Montana, personally appeared Jonathan McNiven, known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed same.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal that day and year first above written.


Tana McNiven

NOTARY PUBLIC for the State of Montana, residing at Huntley, MT.
My commission expires: August 23, 2024

NOTICE OF MEETING
COUNTY WATER DISTRICT OF BILLINGS HEIGHTS REGULAR BOARD MEETING

Wednesday, December 15, 2021 6:00 pm
District Office 1630 Poplar Dr., Billings, MT 59105

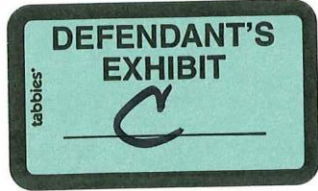
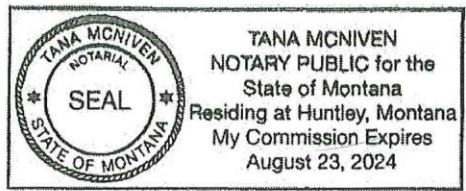
The meeting is open to any interested member of the public. Agendas are prepared for the meetings; please request an agenda from the Board Recording Secretary Pam Ellis, pamellis@billingsheights.com and may be available at <https://billingsheights.com/agendas-and-minutes/>. Agenda items will include Ratification of Board Actions on November 29, 2021 including:

- Removal of Board President and Vice-President and election of new board members for these positions
- Approval of the bylaws received and dated November 19, 2021
- Approval of a contract with Attorney Mark Hoenig
- Approval of Board Director for resolving the fee dispute with the City of Billings
- Approval of a new legal committee to meet with legal counsel Mark Hoenig
- Approval of the consent agenda in the November 29, 2021 meeting agenda
- Approval of Association on behalf of Zackory D. Michales, Homestead Subdivision submitted 10-19-2021
- Approval of Platinum Blue Cross-Blue Shield Policy for staff, P010PFR
- Job Description and Job Posting for General Manager
- Policies, Rules and Procedures for Meetings of the Board, Policy Records Access and Procedure, Uniform Complaint Procedure, and approval of contract from Civic Plus-Municipal for hosting a Standard Design Website and Board Management Software

Additional agenda items may include:

- Approval of the consent agenda including minutes of the November 29, 2021 meeting, November prepaial bills for approval, November bills for approval, Profit and loss statement November 2020-November 2021
- Review of the audit report prepared by Anderson ZurMuhlen
- Finance Committee Report: Laura Drager, Chair
- Review of applications received for General Manager
- Bylaws and Governance Committee Report: Pam Ellis, Chair Approval of proposed procedure for interviewing and hiring a new General Manager
- Contract and appointment of an interim manager
- Discussion with Andrew Phoenix, rate consultant with Rateels
- Safety Committee Report: Jeff Eysel, Chair
- Other agenda items included from staff or Board members

12/03, 12/10 2021
MRS. P.





Heights Task Force

Published by Pam Ellis · December 11 at 10:56 AM ·



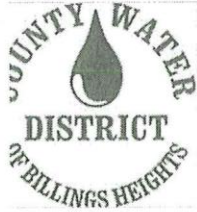
Notice of Meeting

County Water District of Billings Heights Regular Board Meeting

Wednesday, December 15, 2021 6:00 pm

District Office 1540 Popelka Dr., Billings, MT 59105

The meeting is open to any interested member of the public. Agendas are prepared for the meetings; please request an agenda from the Board Recording Secretary Pam Ellis, pamelliscwdbh@gmail.com and may be available at <https://www.yellowstonecountynews.com/county-water.../> See more



HEIGHTSWATERDISTRICT.COM

Agendas and Minutes « County Water District of Billings Heights

The CWDBH Board meetings current tentative monthly agenda will be posted 48 hours prior to the meeting and may be accessed in the month...

83

People reached

2

Engagements

↑ +1.1x average

Distribution score

Boost post

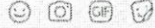
Like

Comment

Share



Comment as Heights Task Force





Heights Task Force

Published by Pam Ellis · December 12 at 4:10 PM · 🌐



The meeting is open to any interested member of the public. Agendas are prepared for the meetings; please request an agenda from the Board Recording Secretary Pam Ellis, pamelliscwdbh@gmail.com and may be available at <https://www.yellowstonecountynews.com/county-water.../>

Agenda items will include Ratification of Board Actions on November 29, 2021 including:

- Removal of Board President and Vice-President and election of new board members ... See more

SINCE 1976

ONE NEWS LOCAL VIEWS

Making Local News Source for Subscriber, Vickie

January 31, 2020

YELLOWSTONECOUNTYNEWS.COM

County Water District of Billings Heights | Yellowstone County News

68
People reached

3
Engagements

↓ -1.1x average
Distribution score

Boost post

👍 Like

💬 Comment

➦ Share



Heights Task Force

Published by Pam Ellis · December 14 at 7:00 AM · 🌐



Notice of Meeting

County Water District of Billings Heights Regular Board Meeting

Wednesday, December 15, 2021 6:00 pm REVISED

District Office 1540 Popelka Dr., Billings, MT 59105

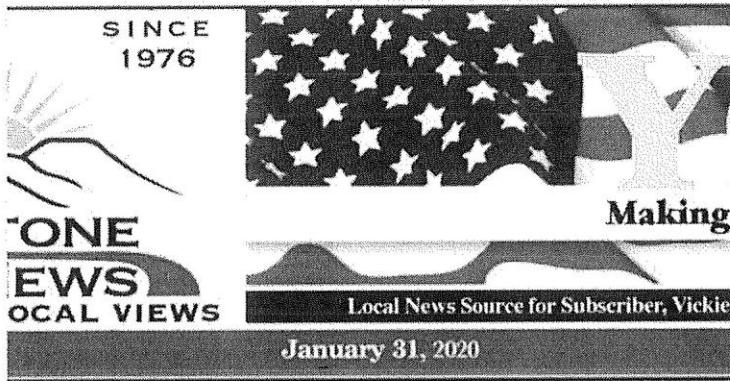
The meeting is open to any interested member of the public. Agendas

are prepared for the meetings; please request an agenda from the

Board Recording Secretary Pam Ellis, pamelliscwdbh@gmail.com and

are available at [https://www.yellowstonecountynews.com/county-](https://www.yellowstonecountynews.com/county-water.../)

[water.../ ... See more](#)



YELLOWSTONECOUNTYNEWS.COM

County Water District of Billings Heights | Yellowstone County News

42
People reached

2
Engagements

↓ -1.7x lower
Distribution score

Boost post

🗨️ 1

👍 Like

💬 Comment

➦ Share

Heights Task Force
 Published by Pam Ellis on December 15 at 11:40 AM

Notice of Meeting
 County Water District of Billings Heights Regular Board Meeting
 Wednesday, December 15, 2021 8:00 pm REVISED
 District Office 1540 Popelka Dr., Billings, MT 59105
 The meeting is open to any interested member of the public. Agendas are prepared for the meetings; please request an agenda from the Board Recording Secretary Pam Ellis, pamelliscwdbh@gmail.com and are available at <http://www.yellowstonecountynews.com/country-water/>

Agenda items will include Ratification of Board Actions on November 29, 2021 including:

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- Approval of a contract with Attorney Mark Noennig
- Approval of Board Direction for resolving the fee dispute with the City of Billings
- Approval of a new legal committee to meet with legal counsel Mark Noennig
- Approve of the consent agenda in the November 29, 2021 meeting agenda
- Approval of Annexation on behalf of Zeckery D. Michales, Homestead Subdivision submitted 10-19-2021
- Approval of Platinum Blue Cross-Blue Shield Policy for staff, P91DPTF
- Job Description and Job Posting for General Manager
- Policies: Rules and Procedures for Meetings of the Board, Policy Records Access and Procedure, Uniform Complaint Procedure, and approval of contract from Civics Plus-Municode for hosting a Standard Design Website and Board Management Software

Additional agenda items may include:

- Approval of the consent agenda including minutes of the November 29, 2021 meeting, November prepaid bills for approval, November bills for approval, Profit and loss statement November 2020-November 2021
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 - Finance Committee Report: Laura Drager, Chair
 - Review of applications received for General Manager
 - Bylaws and Governance Committee Report: Pam Ellis, Chair
- Approval of proposed procedure for interviewing and hiring a new General Manager
- Contract and appointment of an interim manager and hiring Justin Stark and Hendrickson Law firm to respond to Cause No.D.V.210149 filed by Plaintiffs JEFF ENGEL, BRANDON HURST, DENNIS COOK, and TOM ZURBUCHEN against the County Water District of Billings Heights in MONTANA THIRTEENTH JUDICIAL DISTRICT COURT YELLOWSTONE COUNTY on December 10, 2021
 - Discussion with Andrew Rheem, rate consultant with Raifells
 - Safety Committee Report: Jeff Engel, Chair
 - Other agenda items included from staff or Board members
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 - Safety Committee Report: Jeff Engel, Chair
 - Other agenda items included from staff or Board members

YELLOWSTONECOUNTRYNEWS.COM
 County Water District of Billings Heights | Yellowstone County News

55 People reached | 1 Engagement | ↓ -1.4x lower Distribution score **Boost post**

From: Pam Ellis <pamelliscwdbh@gmail.com>
Sent: Monday, December 13, 2021 3:41 PM
To: Ming Cabrera <mingformontana@gmail.com>; David Graves <graves@q.com>; Dennis Cook <Dcook5533@gmail.com>; Laura Drager <lauradrager@remax.net>; Pam Ellis <pamelliscwdbh@gmail.com>; Brandon Hurst <bhurst@meadowlarkco.com>; Tom & Jane Zurbuchen <zurbuchen@bresnan.net>
Cc: Peyton <peyton@heightswaterdistrict.com>; Suzie McKethen <CWDBH1540@outlook.com>; Mark Noennig <mark@hendricksonlawmt.com>; Larry Brewster <larry05@bresnan.net>
Subject: Wednesday, December 15, 2021 6:00 pm REVISED

Notice of Meeting

County Water District of Billings Heights Regular Board Meeting

Wednesday, December 15, 2021 6:00 pm REVISED

District Office 1540 Popelka Dr., Billings, MT 59105

The meeting is open to any interested member of the public. Agendas are prepared for the meetings; please request an agenda from the Board Recording Secretary Pam Ellis, pamelliscwdbh@gmail.com and are available at <https://www.yellowstonecountynews.com/county-water-district-of-billings-heights/>

The bill to print the documents for the December 15 meeting is referenced in the agenda but I didn't have the cost until I picked up the documents a few minutes ago. Mark Noennig recommended that we reprint all the documents from the November 29th meeting as well as all the documents for the December 15th meeting.

The attached agenda says REVISED and is the agenda that was printed and is available on line.

The only difference is that when referencing the lawsuit, the wording is changed to "Justin Stark and Hendrickson Law firm to respond to Cause No.D V 2 1 0 1 4 9". The previous wording said "of" Hendrickson Law Firm. Other employees including Mark Noennig may have billable time responding the the lawsuit. Mark Noenning was contacted by the police officer that Tom Zurbuchen filed the criminal complaint with. Time was spent referencing the correct statute and communicating with the targets of Mr. Zurbuchen's criminal complaint.

I included Tom in this email because he is the only member of the community to contact me directly and request copies of all the documents for the meeting.

Pam

1



Notice of Meeting

County Water District of Billings Heights Regular Board Meeting

Wednesday, December 15, 2021 6:00 pm REVISED

District Office 1540 Popelka Dr., Billings, MT 59105

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 - Safety Committee Report: Jeff Engel, Chair
 - Other agenda items included from staff or Board members
-
- Discussion with Andrew Rheem, rate consultant with Raftelis
 - Safety Committee Report: Jeff Engel, Chair
 - Other agenda items included from staff or Board members

12/3, 12/10

CERTIFICATE OF SERVICE

This is to certify that a copy the foregoing Answer was duly served by mail upon:

Mr. Tyler Dugger
2451 Applewood Avenue
Billings, MT 59102
Email: tylerdugger2@gmail.com

Of Attorney for Plaintiffs

this 30th day of December, 2021.

HENDRICKSON LAW FIRM, P.C.
Of Attorneys for Defendant

By 
Justin Stark

CERTIFICATE OF SERVICE

I, Justin W. Stark, hereby certify that I have served true and accurate copies of the foregoing Answer/Brief - Answer and Counterclaim to the following on 12-30-2021:

Tyler Thomas Dugger (Attorney)

PO Box 1913

Billings MT 59103

Representing: JEFF ENGEL, Dennis Cook, Tom Zurbuchen, BRANDON HURST

Service Method: eService

Electronically Signed By: Justin W. Stark

Dated: 12-30-2021

Tyler T. Dugger
2451 Applewood Avenue
Billings, MT 59102
Phone: (406) 698-5309
Tylerdugger2@gmail.com

Attorneys for Petitioner

**MONTANA THIRTEENTH JUDICIAL DISTRICT COURT,
YELLOWSTONE COUNTY**

**JEFF ENGEL, BRANDON HURST,
DENNIS COOK, and TOM
ZURBUCHEN ,**

Plaintiffs ,

v.

**COUNTER WATER DISTRICT OF
BILLINGS HEIGHTS ,**

Defendant .

Cause No. DV 21 -1494

Judge: Hon. Brett Linneweber

ANSWER TO COUNTERCLAIM

Plaintiffs answer Defendant's General Allegations and Counterclaim as follows:

First Affirmative Defense and General Allegations

9. Plaintiffs deny.
10. Plaintiffs admit the memorandum was received by the District's directors and the District's staff.
11. The contents of the memorandum speak for itself and no response is required. To the degree a response is required, Plaintiffs deny.
12. Plaintiffs deny.
13. Plaintiffs deny.
14. Plaintiffs admit.

15. Plaintiffs deny.
16. Plaintiffs deny.
17. Plaintiffs deny.
18. Plaintiffs deny.
19. As no valid meeting occurred on November 29, 2021, Plaintiffs acknowledge Jeff Engel, Brandon Hurst, and Dennis cook were not present.
20. Plaintiffs deny.
21. Plaintiffs deny.
22. Plaintiffs deny.
23. While denying a valid meeting occurred, Plaintiffs admit Tom Zurbuchen was present on November 29th and made comments.
24. Plaintiffs deny.
25. Plaintiffs deny.
26. Plaintiffs deny.
27. Plaintiffs have insufficient knowledge to confirm or deny and therefore deny.
28. Plaintiffs have insufficient knowledge to confirm or deny and therefore deny.
29. While denying the validity of the December 15, 2021 meeting, Plaintiffs admit the publication appeared in the Yellowstone County News.
30. Plaintiffs have insufficient knowledge and therefore deny.
31. While denying the validity of the December 15, 2021 meeting, Plaintiffs admit the email was received and otherwise it speaks for itself.
32. Plaintiffs deny.
33. Plaintiffs deny.

34. Plaintiffs deny.

35. Plaintiffs deny.

36. While denying the validity of the December 15, 2021 meeting, Plaintiffs acknowledge Jeff Engel, Brandon Hurst, and Dennis Cook were not present.

37. Plaintiffs deny.

38. Plaintiffs deny.

39. Plaintiffs deny.

40. Plaintiffs admit Tom Zurbuchen was present and made comments.

41. Plaintiffs deny.

42. The publication speaks for itself and no response is required, to the degree a response is required Plaintiffs deny.

43. Plaintiffs deny.

44. Plaintiffs deny.

Second Affirmative Defense

45. Plaintiffs plead and incorporate by reference their response to paragraphs 9 through 44 of the First Affirmative Defense and General Allegations.

46. Plaintiffs deny.

Third Affirmative Defense

47. Plaintiffs plead and incorporate by reference their responses to paragraphs 9 through 44 of the Firsts Affirmative Defense and General Allegations.

48. Plaintiffs deny.

Fourth Affirmative Defense

49. Plaintiffs replead and incorporate by reference their responses to paragraphs 9 through 44 of the First Affirmative Defense and General Allegations.

50. Plaintiffs deny.

Fifth Affirmative Defense

51. Plaintiffs replead and incorporate by reference their response to paragraphs 9 through 44 of the First affirmative Defense and General Allegations.

52. Plaintiffs deny.

Counterclaim

1. Plaintiffs replead and incorporate by reference their responses to paragraphs 9 through 36 of the First Affirmative Defense and General Allegations.

2. Plaintiffs deny.

3. Plaintiffs deny.

4. Plaintiffs deny.

5. Plaintiffs deny.

6. Any allegations not specifically admitted are hereby denied.

WHEREFORE, Plaintiffs pray for judgment in their favor and that Defendant takes nothing by its counterclaim. Further Plaintiffs pray for an award of attorney fees and costs and any other equitable or appropriated relief.

DATED this 12th day of January, 2022.

By: /s/ Tyler T. Dugger
Tyler T. Dugger
Attorney at Laws

CERTIFICATE OF SERVICE

I, Tyler Thomas Dugger, hereby certify that I have served true and accurate copies of the foregoing Answer/Brief - Answer to Counterclaim to the following on 01-12-2022:

Mark E. Noennig (Attorney)
208 North Broadway Ste. 324
P.O. Box 2502
Billings MT 59103
Representing: County Water District Billings Heights Service
Method: eService

Justin W. Stark (Attorney)
208 N. Broadway
Ste 324
Billings MT 59101
Representing: County Water District Billings Heights
Service Method: eService

Electronically Signed By: Tyler Thomas Dugger Dated: 01-12-2022