



# Corporation of Harpers Ferry

1000 WASHINGTON STREET • P.O. BOX 217

Harpers Ferry, West Virginia 25425

304-535-2206

Wayne Bishop,  
Mayor

BARBARA HUMES, JAY PREMACK, HARDWICK S. JOHNSON, JR., CHRISTIAN PECHUEKONIS, CHARLOTTE THOMPSON, COUNCIL MEMBERS  
KEVIN GARDEN, RECORDER

March 4, 2020  
Via Email

Mr. Jim Jenkins  
601 Fillmore St.  
Harpers Ferry, WV 25425  
[wolftree123@gmail.com](mailto:wolftree123@gmail.com)

Dear Mr. Jenkins,

This letter serves as fulfillment of FOIA request 2020-0003, received 2/21/2020. There are no costs incurred in fulfillment of this request.

The first paragraph of your request asks for “the total amount spent by the Corporation of Harpers Ferry related to the appeal of our last council election court ruling” to include “all fees paid to lawyers and consultants” as well as “material costs, travel expenses and costs related to office staff working on this matter”. In response to this portion of your request, the Town informs you that no such records exist.

However, in the spirit of FOIA, you will find enclosed all invoices received from the Town’s General Counsel to date, since the November 6, 2019 appeal of the circuit court ruling to the supreme court. Please be aware that invoice descriptions are often in shorthand and are meant to provide a real-time explanation to the Town Council of work assigned and requested. Invoices are not meant to provide a detailed explanation, nor context, to a third party. Accordingly, feel free to contact Town Hall if you have any questions.

The second paragraph of your request asks for the “total amount of expenses to lawyers and consultants related to legal action chosen by council last night due to SB 657” including “updates on any public funds spent related to the action against the State of West Virginia chosen by Town Council on February 20, 2020”. In response to this portion of your request, the Town informs you that no such records exist.

Thank you,

Rachel VanMetre, Town Clerk  
[clerk@harpersferrywv.us](mailto:clerk@harpersferrywv.us)

cc: Mayor  
Recorder  
Town Council  
Bookkeeper

Historic District  
Where The Shenandoah Meets The Potomac

# EUPHEMIA KALLAS, ESQ.

## INVOICE

Legal Services,  
General Counsel

Euphemia Kallas,  
Attorney at Law

P.O. Box 1154  
Shepherdstown, WV  
25443

304-279-2784

CORPORATION OF HARPERS FERRY  
P.O. BOX 217  
HARPERS FERRY, WV 25425

304-535-2206

Invoice Number: 18

Term: November 2019

Date 1/2/2020  
Inv. # 18  
Amt. \$  
Due \$ 5636.77  
Acct. 417 Legal Fees  
Class g

Appr.  CP

Description	Quantity	Unit Price	Cost	Date
Received & Reviewed Circuit Court Notice of Order & sent same to Client.	0.8	\$ 225.00	\$ 180.00	11/6/19
Reviewed Respondents' Notice of Filing of Notice of Appeal.	0.5	\$ 225.00	\$ 112.50	11/7/19
Conducted legal research & drafted Ltr. re: effect of Appeal Filing and sent same to Client.	1.6	\$ 225.00	\$ 360.00	11/7/19
Reviewed Plaintiff Demand Ltr.	0.3	\$ 225.00	\$ 67.50	11/8/19
Reviewed Respondents' Motion for Stay.	0.2	\$ 225.00	\$ 45.00	11/8/19
Reviewed Respondents' Appeal filing.	0.9	\$ 225.00	\$ 202.50	11/8/19
Reviewed Client Concern Ltrs.	1.5	\$ 225.00	\$ 337.50	11/8/19
Conducted Legal Research re: Plaintiff Demand Ltr.	2.3	\$ 225.00	\$ 517.50	11/9/19
Reviewed Prior Documents & Drafted Reply to Client Ltrs.	2.1	\$ 225.00	\$ 472.50	11/10/19
Edited Reply Ltrs. & sent same to Client.	1.9	\$ 225.00	\$ 427.50	11/11/19
Drafted Response to Plaintiff Demand Ltr.	0.8	\$ 225.00	\$ 180.00	11/11/19
Edited Response to Plaintiff Demand Ltr. & sent same.	0.7	\$ 225.00	\$ 157.50	11/12/19
Reviewed Petitioners' Response in Opposition to Stay.	0.7	\$ 225.00	\$ 157.50	11/12/19
Attended Court Scheduling Conference.	0.4	\$ 225.00	\$ 90.00	11/12/19
Reviewed Petitioners' Motion to Expedite.	0.5	\$ 225.00	\$ 112.50	11/13/19

Description	Quantity	Unit Price	Cost	Date
Conducted Research & Drafted Recount Procedure Brief.	4.2	\$ 225.00	\$ 945.00	11/19/19
Edited & Filed Recount Procedure Brief.	1.3	\$ 225.00	\$ 292.50	11/20/19
Prepared for Injunction Hearing.	1.7	\$ 225.00	\$ 382.50	11/21/19
Attended Court Hearing re: Injunction & Stay.	0.8	\$ 225.00	\$ 180.00	11/22/19
Prepared for Town Council Special Meeting.	1.0	\$ 225.00	\$ 225.00	11/25/19
Attended Town Council Special Meeting.	0.8	\$ 225.00	\$ 180.00	11/26/19
Expenses - Speciality Business Copying Fee.	0.0	\$ 0.00	\$ 11.77	11/14/19
		Subtotal	\$ 5,636.77	
	<b>25</b>	Total	\$ 5,636.77	

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P.O. BOX 217  
HARPERS FERRY, WV 25425

304-535-2206

Invoice Number: 19

Term: December 2019

Date 1/7/2020  
Inv. # 19  
Amt. 697.50  
Due 2/5/2020  
Acct. Legal 417  
Class g

Appr.  CP

Description	Quantity	Unit Price	Cost	Date
Received & Reviewed Appellants' Appeal Brief.	0.6	\$ 225.00	\$ 135.00	12/6/1
Conducted Research re: FOIA Request.	2.0	\$ 225.00	\$ 450.00	12/11/1
Conducted Legal Research re: PC Requirements & sent same to Client.	0.5	\$ 225.00	\$ 112.50	12/19/1
		Subtotal	\$ 697.50	
	<b>3.1</b>	Total	\$ 697.50	