

VIRGINIA: IN THE CIRCUIT COURT OF THE CITY OF CHARLOTTESVILLE
COMMONWEATH OF VIRGINIA

v.

File No. 11-102

GEORGE W. HUGUELY, V

ORDER ADOPTING MEDIA PLAN

WHEREAS, given the extraordinary public interest and media attention given to this case and the need for special accommodations for the news media and heightened security in and around the courthouse, and

WHEREAS the Court has directed Mr. Richard Barrick and the City of Charlottesville Communications Department to prepare and promulgate a formal Media Plan to be in effect commencing February 6, 2012, through the duration of the trial of this case, including any post-trial hearings, and

WHEREAS Mr. Barrick has prepared a Media Plan which has been reviewed by counsel and the Court and has been found appropriate to be implemented to insure reasonable access of the media and the general public to the courtroom and to the proceeding being conducted in this case consistent with the orderly administration of justice,

It is hereby ORDERED, ADJUDGED and DECREED that the document entitled Huguely Trial Media Plan, attached hereto, be incorporated herein and made applicable to all proceeding conducted in this case. Persons violating this Order and the terms incorporated therein shall subject to all penalties allowed by law, including sanctions for contempt and denial of access to the proceeding.

Copies of the foregoing Order and the Huguely Trial Media Plan attached thereto shall be distributed to all media representatives and/organizations seeking credentials to cover this trial.

The Clerk is directed to mail a copy of the foregoing to all counsel of record.

Endorsements are dispensed with pursuant to Rule 1:13 of the Rules of the Supreme Court of Virginia.

And it is so ORDERED.

Enter: 

Judge

Date: 02/01/12

Huguely Trial Media Plan

The Commonwealth of Virginia

vs.

George Wesley Huguely, V

Prepared by

The City of Charlottesville Communications Department

In conjunction with

The 16th Judicial Circuit of the Commonwealth of Virginia,
The City of Charlottesville Sheriff's Office, and
Media representatives covering the trial

January 31, 2012

Table of Contents

Fact Sheet.....	2
Media Plan.....	3
Plan Goals	
Contact Information	
Standards of Conduct for Covering the Trial.....	4
Closed Circuit Coverage	
Cameras in the Court Building	
First Day of Trial - Jury Selection	
Jury Privacy	
Interviews	
Courtroom Protocol	
Television Perimeter	
Evidence	
Verdict	
Courtroom Seating	6
Courtroom Access Procedures	7
Identification	
Media Registration	
Courtroom Seating and Media Access to Courtroom	
Documents Available to the Media	10
Prior to Trial	
During the Trial	
Transcripts	
Logistical Assistance.....	11
Overview	
Media Liaison Office	
Media Parking	
Satellite Vehicle Parking Area	
“Live Shot” Locations - Reserved	
Interview Location - “Stake Out Area”	
Remote Viewing Location	
Media Office Space	
Utilities	
Business Center	
Restrooms	
Smoking	
Clean Up	
Security	

Fact Sheet

Case Name: *The Commonwealth of Virginia vs. George Huguely*

Case Number: 11-102

Trial Date: February 6, 2012 to February 17, 2012

Expected Duration of Trial: Approximately two weeks

Presiding Trial Judge: The Honorable Edward L. Hogshire
Charlottesville Circuit Court
16th Judicial Circuit of the Commonwealth of Virginia

Courtroom: Charlottesville Circuit Court (only one courtroom)
315 High Street
Charlottesville, Virginia 22902

Defendant: George Wesley Huguely, V

Prosecuting Attorneys: Warner D. Chapman, Commonwealth's Attorney
Claude V. Worrell, II, Assistant Commonwealth's Attorney

Defense Attorneys: Rhonda Quagliana, Esq.
Francis McQ. Lawrence, Esq.

The Charges: Murder in the First Degree
Robbery
Burglary in the Nighttime
Breaking and Entering
Grand Larceny
Murder in the Commission of Robbery

Sheriff: James E. Brown, III

Media Coordinators: Ric Barrick
City of Charlottesville
(434) 970-3129
(434) 989-9373
barrick@charlottesville.org Email
Email correspondence strongly encouraged

Internet trial updates: www.Charlottesville.org/trialupdate

Internet logistics information: Blue Ridge Internet 321 E Main St # 200 Charlottesville, VA
(434) 817-0707

Court Reporter: Lane's Court Reporters

Media Plan

This plan contains guidelines and policies for media coverage of the trial of the *Commonwealth of Virginia vs. George Huguely*, scheduled to begin on Monday, February 6th, 2012, in the Charlottesville Circuit Court, 315 High Street, Charlottesville, VA 22902.

The goals of this media plan are to ensure that:

- 1) There is a fair and equal administration of justice; that all parties obtain a fair trial.
- 2) The public and the media are accommodated to the best of the Court's abilities during the trial.
- 3) Appropriate security and decorum are maintained in the Court Building and surrounding grounds and buildings.
- 4) The media have fair, timely, impartial, and equal access to information surrounding the trial through release of information by the Court, the Charlottesville Office of Communications, the Charlottesville Commonwealth's Attorney's Office, and by the Court Reporting Services.
- 5) Disruption of normal operations and activities in and around the Circuit Court are minimized to allow citizens to conduct necessary business with the City and Court throughout the duration of the trial.
- 6) Victims and family members are afforded dignity, respect, and privacy.

Members of the media who plan to attend the trial or who have questions regarding media arrangements should contact:

Ric Barrick
Director of Communications
City of Charlottesville
605 East Main Street
Charlottesville, VA 22902
(434) 970-3129
barrick@charlottesville.org Strong preferred

Note: The conditions and procedures specified in this media plan are subject to modification by the court at any time during the course of the trial. Additional annexes to the Plan covering areas such as logistical support, fees, registration, code of conduct and so forth will be issued as soon as they are completed. These annexes shall become an integral part of this Plan when they are issued. Coverage of the trial by the media indicates an agreement to abide by the terms of this Plan and any annexes.

Standards of Conduct for Covering the Trial

One of the advantages of a media plan is that it explains the ground rules which all parties are expected to follow: what the media expect from the Court, as well as what the Court expects from the media. These standards of conduct will ensure that the goals of this plan will be met. The City and Court have devoted numerous resources to provide for the needs of the media during this trial. In return, it is requested that the media abide by the rules to make the operations run as smoothly as possible.

Violators of these standards of conduct will not be allowed to return to the courtroom or viewing area during the remainder of the court proceedings and may be subject to contempt of court determined by the Presiding Judge.

Your cooperation is appreciated.

Cameras in the Court Building

No cameras or recording devices of any kind (except the closed circuit camera) are permitted in the Circuit Court Building or the remote viewing location.

First Two Days of Trial - Jury Selection

The first and second day of the trial will begin with the jury pool seated in the courtroom with one seating at 9:30am and a separate seating at 1:30pm. During this process, jury seating may eliminate some seating capacity in the courtroom. As prospective jurors are dismissed and seating opens, media access will be provided according to a system of daily Courtroom Day Passes.

Jury Privacy

During the trial, no media will be allowed to make, distribute, publish or broadcast any picture, photograph or sketch of anyone called or chosen to be a juror, or distribute or broadcast in any way personal information such as the names, telephone numbers or addresses of potential or chosen jurors. Potential jurors have been told to identify themselves as such if approached by the media while going to or from the Court building.

During the trial, the media are strictly prohibited from attempting to contact or talk to potential or chosen jurors. Following the trial, it is up to the individual jurors as to whether they wish to conduct interviews with the media.

Interviews

All interviews with those connected with the proceedings in this case must be conducted in the designated interview area located immediately in front and outside the Court building. Members of the media may not conduct interviews in the courtroom, the Court building, the remote viewing location, or inside any City building. Violators of this rule will be asked to leave the location and will be subject to having their courtroom access revoked.

Courtroom Protocol

Pagers, cellular phones, and all wireless devices will not be permitted in the courtroom. Violators will not be allowed to return to the courtroom or viewing area during the remainder of the court proceedings for that day and may be subject to having their credentials revoked and/or being found in contempt of court.

In order to limit disruptions in the courtroom, it is expected that you will remain seated until the judge calls for a recess. Anyone leaving the courtroom prior to a recess will not be allowed to reenter until the next recess is declared.

Inside the court building, no ornaments such as T-shirts, shirts, buttons, placards, badges, etc. may be worn which contain any written or visual commentary about this case, anyone participating in it, or are related to this case in any way. Dress code for the courtroom is appropriate business attire.

Please see additional Security Plan issued by the Charlottesville Sheriff's Department.

Television Perimeter

To avoid congestion and potentially unsafe or disruptive conditions, no stand-ups or other television operations may be conducted on Courthouse property, except in designated areas. Live and satellite trucks are permitted on 4th street, NW which will be blocked to local traffic during the duration of the trial.

Evidence

Evidentiary materials such as documents, photographs and the like will not be available for public viewing or direct media access until after the trial has concluded and the jury has been excused. Nothing of this nature will be made public, even after post-trial motions are heard, absent further order of the Court.

Verdict

The Court will announce when the jury has reached a verdict. This announcement can be monitored from the remote viewing location or the courtroom (with appropriate access passes for that court day - see Courtroom Access). After the verdict is announced, no one will be allowed to leave the courtroom until the court recesses and the jurors have been escorted from the building.

Courtroom Seating

This Plan has been developed in an attempt to accommodate the needs of the media in light of the limited courtroom space, while giving due consideration to the family and friends of both the victim and the defendant, plus allowing access to the general public. The Courthouse opens at 8:30 A.M. with the active docket of the Court commencing at that time. Typically, short hearings and other Court business not associated with the on-going jury trial are conducted between 8:30 and 9:30, with the jury trial starting at 9:30 or as soon thereafter as possible. The local practice is to break for lunch for one hour between 12:30 and 1:00 P.M.

Reserving seats before Court opens or before the trial starts will not be permitted. A small area, located between the front entrance and the metal detector, will be set aside for temporary storage of electronic equipment. Placement of equipment this space will be at the owner's risk.

The Charlottesville Circuit Court courtroom is the largest in the City, but its capacity is roughly 150 persons in addition to jury and court personnel.

Allocation of seating

As a result of the space limitations of the courtroom, seating will be allocated in the following manner:

Sheriff Personnel.....	Confidential
Victims and Family Members.....	53
<i>Positioned in the first three rows of each side</i>	
Media.....	20
Local Media	10
Sketch Artists	4
<i>Positioned on left side of courtroom</i>	
General Public.....	51
Media Liaison.	2
TOTAL.....	130+

Sketch Artists

Selection of sketch artists for the 4 reserved seats will be based upon input from the media registering to cover the trial. Efforts will be made to provide for the needs and requests of as many media outlets as possible, given the limited number of seats available. Specific contact information for the artists will be provided in the online and in the Trial Press Room as soon as the artists are identified and complete the registration process with the Charlottesville Communications Department.

Courtroom Access Procedures

Media Registration

In order to be eligible for consideration for access to media seating in the courtroom, transmission vehicle parking, assigned media workspace, and/or assigned live shot locations, media representatives must register with the Charlottesville Communications Department by **February 1, 2012**.

Credentialing forms will be available online or from the Communications Department. Notice of the availability of registration forms will be provided to the AP Wire no later than February 3, 2012. Notification will also be distributed through other appropriate means prior to the trial.

Media organizations will be asked, as part of the registration process, to designate a single point of contact from their organization to liaison with the Charlottesville Communications Department prior to and during coverage of the trial. This point of contact will manage the organization's registration paperwork and will coordinate the process from the media end.

In order to register, media representatives must possess appropriate identification issued by their media organization and provide copies of same with their registration. Media representatives who choose not to register by **February 1st, 2012** may still cover the trial, but they may not have access to the facilities noted. The Charlottesville Communications Department will consider special circumstances which prevent media representatives from meeting the **February 1, 2012** deadline on a case-by-case basis.

Identification Credentials

Media representatives (including both reporters and support/technical personnel) will be required to display approved trial identification credentials when accessing trial-related media facilities including the courtroom, the transmission vehicle area on 4th Street, media office space areas, and other areas as designated. Specific details regarding credentials will be provided at the time media representatives complete the registration process.

Courtroom Seating

Only one seat per media organization will be permitted. The choice of which registered media representative occupies the seat on a given day is up to the media organization.

There will be 20 Courtroom Day Passes allocated for the media for each day of the trial. These passes are valid for a seat in the courtroom for the trial on a particular day, pending other directives of the Court. An additional ten media passes will be provided to local media that will guarantee access to the courtroom during the trial. Courtroom Day Passes must be claimed each morning at the Media Liaison Office no less than 30 minutes before the start of the trial (The Media Liaison Office will open at 8:00am). The appearance of the Courtroom Day Pass will change each day, so that, for example, a Tuesday Courtroom Day Pass may not be used on Wednesday.

First priority for Courtroom Day Passes will be given to those media that have been covering the pre-trial hearings, per the listing maintained by the Charlottesville Communications Department. In order to receive first priority, these media organizations must register with the Charlottesville Communications Department and complete a Request for Courtroom Access Consideration form prior to **February 1, 2012**.

Second priority will be given to those media who register and complete a Request for Courtroom Access Consideration form by **February 1, 2012**. Any media not requesting access by that date may not be provided with Courtroom Day Passes.

To assure the most equitable distribution of courtroom seats, no fewer than 20 Courtroom Day Passes will be made available each day to registered media organizations without guaranteed seats. These passes will be distributed by first come first served basis among all registered media organizations which do not already have access on a given day.

Media Access to the Courtroom

Each morning of the trial, a representative from each media outlet must report to the Media Liaison Office at the Levy Opera House on High Street to pick up the Courtroom Day Pass for his/her media outlet. The representative must present a trial identification and will be asked to sign for the pass. Upon entering the courtroom, both the Courtroom Day Pass and the individual's identification must be presented to the deputies at the court building. The organization listed on the pass must match the individual's organization as listed on his/her identification. **All persons entering the courtroom may be required to show a photo identification and must have both a pass as well as their credential.**

When the person using the pass decides to leave the courtroom, he or she may transfer his or her Courtroom Day Pass to another representative from his or her media outlet. This new user must be from the same media outlet shown on the pass and possess appropriate identification to match the pass. All persons entering the courtroom will be required to sign in and show a photo identification.

If, by 30 minutes before the trial start time for that day, Courtroom Day Passes remain unclaimed, those remaining seats may be allocated to media by a drawing which will take place at the Media Liaison Office that morning. This should allow a more orderly process than first-come, first-served, which could require reporters to line up in the early morning hours. Specific procedures for this lottery will also be posted to the online Trial Press Room and at the Media Liaison Office.

Any of the media seats which have not been claimed by media with Courtroom Day Passes (pre-allocated or through the drawing described above) will be turned in to the Media Liaison each day for other uses.

The Judge will announce at the end of each day the start time for the next session. Media attending the trial that day must report to the Sheriff's Representative in the courtroom with their Day Pass and Media Identification and must be seated in the courtroom no later than 15 minutes before the trial start time. Reporters should be mindful that accessing the courtroom involves security checks, and ample time should be given to ensure going through this process.

Documents Available to the Media

Prior to Trial

Prior to the start of the trial, all advisories and updates pertaining to the trial proceedings will be posted by the Charlottesville Office of Communication trial website at <http://www.charlottesville.org/trialupdate>. Free wireless access is provided in the Levy Opera House and around the downtown mall by the City of Charlottesville.

In cases where documents may not be available immediately in an electronic format, alerts of the availability of those documents may be sent to reporters via e-mail, posted online at the Trial Press Room and/or posted at the Media Liaison Office. Media representatives must sign up online for automatic updates.

Notification will be made by e-mail by the Charlottesville Office of Communications or to all media outlets who have subscribed to the media list for this trial.

During the Trial

During the trial, media should monitor the online Trial Press Room or the Media Liaison Office near the Court Building daily for any new information on court procedures and local developments. Evidentiary materials such as documents, reports, photographs and the like will not be available for public viewing or direct media access until after the trial has been concluded and the jury has been discharged.

Transcripts

Lane's Court Reporters is the official felony reporting service for this trial. If reporters are interested in purchasing expedited copy, overnight copy or the transcript at the conclusion of the trial, Lane's Court Reporters should be contacted directly for information and to make financial arrangements for copy.

Logistical Assistance

Overview

The City of Charlottesville Office of Communications is the lead agency for coordinating media logistics for the trial. The City will make all reasonable efforts to work with the media and its logistical needs, while still maintaining as normal as possible operations for the Circuit Court and City functions. Media representatives are advised to note all deadlines for service and/or location reservations. Media having special or specific needs should communicate these to the Communications Department as early as possible so that attempts may be made to meet as many needs as possible.

Media Liaison Office

The Charlottesville Department of Communications will maintain a Media Liaison Office at the Levy Building near the Court building. The Media Liaison Office will serve as the focal point for media relations throughout the trial. A Media Liaison will be available throughout the day to assist with media needs. Media should direct any and all inquiries here, so as not to disrupt ongoing City business in City facilities. The Media Liaison Office and the Levy Opera House will operate on a 8:00am – 5:00pm schedule but special provisions can be made to stay later in the day by contacting the Charlottesville Department of Communications.

Media Parking

The Circuit Court and adjacent area businesses will be in operation for normal City business throughout the trial. Media representatives should refrain from parking in any spaces signed for reserved parking, or in other spaces where parking is not permitted. Special signage may be added to the East High Street area for purposes of modifying parking and/or traffic flow. At no time should vehicles be driven or parked on any grass or sidewalk area without prior permission from the Media Liaison.

Satellite Vehicle Parking Area

All efforts will be made to accommodate television crews requiring parking space for a satellite or microwave transmitting vehicle and radio personnel who broadcast from their vehicle. A designated area will be provided on Fourth Street, NE that can accommodate 9 standard trucks and additional space will be available on 3rd Street, NE for an additional 5 trucks. These spaces can be reserved for up to two weeks during the trial and no assistance will be provided by City officials if trucks need to be removed within that period and are blocked by other media. First priority for parking transmission vehicles will be given to those agencies that have been covering the pre-trial hearings, per the listing maintained by the City of Charlottesville Office of Communications, provided they register with the Communications Department and indicate their desire for such parking prior to **February 1, 2012**. Second priority will be given to those media who register and complete a Request for News Production Vehicle Parking form by **February 1, 2012**. These forms will be available on the Internet at the online Trial Press Room. All requests for vehicle parking must be submitted by **February 1, 2012**. Any media not requesting access by that date may not be provided with vehicle parking.

Parking of transmission vehicles within the designated parking area is not permissible until Sunday, February 5th, except on a short-term basis. Specifics regarding parking area sizes, costs, etc. will be provided as part of the registration process. Areas adjacent to the vehicle parking area should be maintained in a clean and safe condition at all times and are subject to the code of conduct as provided in the registration materials.

“Live Shot” Locations - Reserved

Media organizations may request space to establish a “permanent” live broadcast location in designated areas south of the Court building. A limited number of spaces are available. Spaces will be 10 feet wide by 20 feet deep. Media organizations acquiring a space may, at their expense, erect tents, scaffolding or other structures provided these conform to applicable Fire and Inspections regulations. Acceptable areas for this purpose are Jackson Park at the corner of High Street and 4th Street, NE, the grassy area across the street and adjacent to the Courthouse, and the small grassy area on Courthouse property (to the right of the building as you face the Courthouse). Utilities (telephone, broadband, ISDN) may be run to these locations at the media’s expense (see Utilities section below). Cables may be run from these locations to the transmission parking area and left in place for the duration of the trial. In the case of cables running over streets with active car access, cable covers must be used. No cables will be permitted to run across High Street to the Courthouse. **Satellite trucks will begin to be accommodated Sunday, February 5th.**

Parking on the before mentioned locations near the courthouse will be provided free of charge. If the trial runs longer than the reserved period, the media occupying a location will be given first option to remain in that location. Specific instructions will be provided when media are provided credentials. No organization may reserve more than one location.

Priority for Live Shot locations will be assigned in the same manner as for Transmission Vehicle Parking. The City of Charlottesville Communications Department will determine the assigned locations for the media. Efforts will be made to locate transmission vehicles as close as possible to Live Shot locations, given the parameters of available parking areas.

Approved Interview Locations

An area will be designated outside the Court building for daily interviews/news conferences with trial participants including attorneys and others (on an as-available basis at the discretion of the individual being interviewed). Cameras located in this area will have a reasonably clear view of the entry and exit doors to the Court building. A grassy area on the opposing side of the street is available on a first come first served basis each day. Public access along the side walk areas must be maintained at all time and may be enforced by the Charlottesville Police Department. A small tent may be provided to cover a speaker’s area in the event of inclement weather. This is for taped interviews only. An area will also be designated for still photographer use. Media may run cables to the Live shot area and leave them in place throughout the trial but cables must be kept off of the sidewalk area with the exception of the corner area leading to the satellite truck area on 4th Street, NE. Cable paths will be designated and cable covers must be used at walkway and/or roadway crossings. Microphones may be attached to the podium on a first-come, first-served basis. Media needing mult-boxes, microphone stands, etc. should plan to provide those items. There is no charge for using the interview area at any time.

Remote Viewing Location

Because of limited seating available within the courtroom, a remote viewing location will be established at the Levy Opera House at 500 East High Street. This location will have closed circuit video and audio feeds from the courtroom. No recording or re-broadcast, simultaneous or otherwise, will be permitted for any purpose. This rule will be strictly enforced and subject to maximum sanctions for violation.

A portion of the seats in the remote location may be reserved for official use at the Court's discretion. Additionally, a portion of the seating may be reserved for public use, at the Court's discretion.

While the remote location will be considered an extension of the courtroom, media members may come and go as they please, without waiting for a recess, provided they do not disturb others. Eating and drinking are permitted in this location. Reasonable care should be taken to assure cleanliness in the area. The use of cell phones inside the room is not permitted.

Media Office Space

Media organizations may request space to locate office trailers or other temporary office structures in an approved location near the Court building. Any structures must be approved by the City for compliance with Fire, Inspections and other regulations. Specific details on requirements will be provided upon request. Utilities may be run to these offices at the media's expense (see Utilities section). The City shall not assume liability for any loss or damage to any equipment, materials or personnel. Work space will be provided, free of charge, in the Levy Opera House building that provides wireless internet service and electricity and bathroom access. In order to accommodate as many requests for space as possible, the City of Charlottesville Office of Communication reserves the right to limit the amount of space any one organization may reserve.

Priority for office space assignments will be assigned in the same manner as for Transmission Vehicle Parking (above). The Charlottesville Communications Department will determine the assigned spaces. Media must request office space no later than **January 31, 2012**.

Utilities

Telephone/Fax/Internet/ISDN

Media outlets may have communications lines run to their Transmission Vehicle, Live Shot location, and/or Media Office Space locations. These services can be provided by the various local utilities and billed directly to the media outlet. The Charlottesville Communications Department will facilitate contact with the utilities and assist in general site orientation for the utilities prior to installation.

Electrical Power

Electrical power hookups will not be provided in the Transmission Vehicle, Live Shot and Media Office Space locations.

Business Center (Office Support/Copy/Fax/Package Shipping)

Office support services may be provided by a vendor contracted by the City. The vendor will operate during posted hours, and weekend hours will not be available. All services provided by the vendor will be charged to the media on a cost-per-service basis. The Business Center will be located in the immediate area of the Media Office spaces and the Transmission Vehicle Parking areas.

Restrooms

Restroom facilities will be provided in the vicinity of the Courthouse at the Levy Opera House at the corner of East High and Park Streets. The use of restrooms in buildings other than the Court building should be avoided.

Smoking

Smoking is not allowed in the Courthouse or any City building. It is requested that media outside the facilities dispose of cigarette refuse in the receptacles provided.

Clean Up

Every attempt has been made to keep the Courthouse grounds clean and litter free. All attendees are asked to dispose of trash and papers in the receptacles provided.

Security

The trial is expected to take approximately two weeks. Any equipment left unattended either during the day or overnight will not be secure. Unattended and unidentified items left in or near the Court building or Levy Opera House may be considered suspicious and moved, inspected or destroyed by security.

The Charlottesville Police Department will provide basic security for the media areas; however, use of the area by the media constitutes agreement that the City of Charlottesville shall not be responsible for any loss or damage to any media equipment or belongings. Media representatives wishing to provide additional security for equipment and/or personal items should contact the Charlottesville Communications Department in advance.

Metal detectors will be in use at all entrances to the Court building and in the area adjacent to the courtroom. Metal detectors may be used at the entrances to the remote viewing location. Access to the Court building not mentioned previously (those areas not associated with the trial) will be subject to normal visitor-control procedures.

Indemnity

All media, including but not limited to organizations, affiliated representatives, employees and individuals, covering the Commonwealth of Virginia vs. George Huguely trial hereby agree to indemnify the City of Charlottesville, Virginia, its officials, employees and agents, and save them harmless from and against any and all claims, damages, liability, costs and expenses in connection with loss of life, personal injury, and/or damage to property arising from or out of any occurrence arising as a result of any activity, operation or use of municipal property granted pursuant to the Media Plan.