

**IN THE SUPREME COURT OF THE STATE OF IDAHO**

COMMITTEE TO PROTECT AND PRESERVE  
THE IDAHO CONSTITUTION, INC.; MORMON  
WOMEN FOR ETHICAL GOVERNMENT;  
SCHOOL DISTRICT NO. 281, LATAH COUNTY,  
STATE OF IDAHO; IDAHO EDUCATION  
ASSOCIATION, INC.; JERRY EVANS; MARTA  
HERNANDEZ; STEPHANIE MICKELSEN;  
ALEXIS MORGAN, on behalf of herself and her  
minor children; KRISTINE ANDERSON, on behalf  
of herself and her minor children; each of the  
foregoing individually and as private attorneys  
general on behalf of the public of the State of Idaho,

Petitioners,

v.

STATE OF IDAHO, acting by and through the  
IDAHO STATE TAX COMMISSION,

Respondent,

and

IDAHO STATE LEGISLATURE,

Proposed Intervenor-Respondent.

Docket No. 53264-2025

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**VERIFIED PETITION TO INTERVENE**

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Jeremy C. Chou, ISB No. 5680  
Morgan D. Goodin, ISB No. 11184  
GIVENS PURSLEY LLP  
601 W. Bannock St.  
PO Box 2720  
Boise, ID 83701-2720  
*Attorneys for proposed Intervenor-Respondent*

The Idaho State Legislature, through President Pro Tempore of the Idaho Senate, Kelly Arthur Anthon, and Speaker of the Idaho House of Representatives, Mike Moyle, moves the Court for leave to intervene under Idaho Appellate Rules 5(a) and 7.1. This petition is supported by the accompanying brief.

As set forth in the accompanying brief, intervention is appropriate under both Idaho Code § 67-465 and Idaho Appellate Rule 7.1. The Legislature respectfully requests this Court grant its intervention as Intervenor-Respondent.

Dated: October 1, 2025.

GIVENS PURSLEY LLP

By /s/ Jeremy C. Chou  
Jeremy C. Chou  
Morgan D. Goodin  
Attorneys for the Idaho State  
Legislature

STATE OF IDAHO    )  
                                  ) ss.  
County of Ada        )

I, Senator Kelly Arthur Anthon, President Pro Tempore of the Idaho State Senate on behalf of the Idaho State Legislature, being first duly sworn and deposes says:

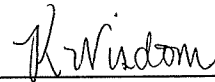
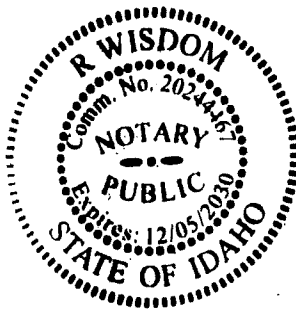
I have read the foregoing **VERIFIED PETITION TO INTERVENE AND ACCOMPANYING BRIEF**, know the contents thereof, and the same are true to the best of my knowledge, information, and belief.

Dated: October 1, 2025.



\_\_\_\_\_  
Senator Kelly Arthur Anthon

SUBSCRIBED AND SWORN to before me this 1<sup>st</sup> day of October, 2025.



\_\_\_\_\_  
NOTARY PUBLIC FOR IDAHO

Residing at Boise, Idaho

My Commission Expires 12/05/2030

STATE OF IDAHO     )  
                                  ) ss.  
County of Ada         )

I, Representative Mike Moyle, Speaker of the Idaho House of Representatives,  
being first duly sworn and deposes says:

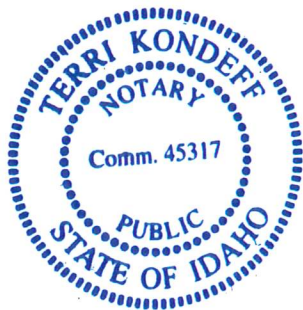
I have read the foregoing **VERIFIED PETITION TO INTERVENE AND  
ACCOMPANYING BRIEF**, know the contents thereof, and the same are true to the best  
of my knowledge, information, and belief.

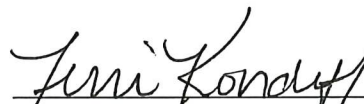
Dated: October 1, 2025.



Mike Moyle

SUBSCRIBED AND SWORN to before me this   1   day of October, 2025.



  
NOTARY PUBLIC FOR IDAHO  
Residing at Ada County  
My Commission Expires 11/17/2029

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 1, 2025, I filed the foregoing electronically through the iCourt System, which caused the following parties or counsel to be served by electronic means:

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