

LAWRENCE G. WASDEN  
ATTORNEY GENERAL

STEVEN L. OLSEN  
Chief of Civil Litigation

MEGAN A. LARRONDO, ISB # 10597  
ROBERT A. BERRY, ISB # 7742  
CORY M. CARONE, ISB # 11422  
Deputy Attorneys General  
954 W. Jefferson Street, 2nd Floor  
P.O. Box 83720  
Boise, ID 83720-0010  
Telephone: (208) 334-2400  
Facsimile: (208) 854-8073  
[megan.larrondo@ag.idaho.gov](mailto:megan.larrondo@ag.idaho.gov)  
[robert.berry@ag.idaho.gov](mailto:robert.berry@ag.idaho.gov)  
[cory.carone@ag.idaho.gov](mailto:cory.carone@ag.idaho.gov)  
Attorneys for Respondents Lawrence Denney and  
the State of Idaho

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

In Re: Petition for Writ of Prohibition.

RECLAIM IDAHO, and the COMMITTEE  
TO PROTECT AND PRESERVE THE  
IDAHO CONSTITUTION, INC.,

Petitioners,

v.

LAWRENCE DENNEY, in his official  
capacity as the Idaho Secretary of State, and  
the STATE OF IDAHO,

Respondents,

Supreme Court Docket No. 48784-2021

**DECLARATION OF  
HALEY HICKS**

and

SCOTT BEDKE in his official capacity as Speaker of the House of Representatives of the State of Idaho; CHUCK WINDER, in his official capacity as President Pro Tempore of the Idaho State Senate; SIXTY-SIXTH IDAHO LEGISLATURE,

Intervenor-Respondents.

I, Haley Hicks, declare as follows:

1. I am over the age of 18 years and competent to testify on the matters herein. I make this declaration based upon my own personal knowledge.

2. I am currently employed with the Canyon County Clerk's Office as the Canyon County Elections Supervisor. I have held this position since March of 2019. Prior to that, I was employed as an Elections Specialist. I started that position in April of 2018.

3. As part of my work for the Canyon County Clerk's Office, I oversee activities related to the administration of elections. This includes overseeing the verification of signatures on initiative and referenda petitions, verifying said signatures, and handling any requests for removal of signatures from said petitions.

4. It is the decision of the initiative or referendum sponsor as to the frequency with which they submit signatures for verification by this Office. They can choose to submit signatures for verification weekly, monthly, all at once, or at any other interval they choose. Some sponsors

choose to submit signatures all at once, and some sponsors choose to submit signatures on a rolling basis.

5. Signatures are typically verified by the Canyon County Clerk's Office as soon as possible. With the last few initiative and referenda petitions, this office has been able to verify signatures within a couple of weeks of submission by the petition sponsor.

6. I cannot recall the Canyon County Clerk's Office receiving any requests for signature removal from either initiative or referenda petitions.

7. There are costs to the Canyon County Clerk's Office when an initiative or referendum petition is circulated. With a statewide initiative, it typically requires the equivalent of one month of work for one to two people working full time to verify the signatures on a single petition. It is hard to manage this work with this Office's five employees. We are occasionally required to utilize temporary workers or overtime to verify all the required signatures and to perform the Office's other duties during the required timeframe for verification, especially if an election is held during that period. It is my understanding that this is even more of a burden for smaller county clerk offices, which have fewer staff members.

I declare under penalty of perjury pursuant to Idaho Code § 9-1406 that the foregoing is true and correct.

DATED this 25 of May, 2021.

By: 

Haley Hicks

## CERTIFICATE OF SERVICE

I certify that on this 2<sup>nd</sup> day of June, 2021, I filed the foregoing document electronically through the iCourt E-File system, which caused the following iCourt-registered counsel to be served by electronic means, as more fully reflected on the Notification of Service.

DEBORAH A. FERGUSON  
CRAIG H. DURHAM  
Ferguson Durham, PLLC  
223 N. 6th Street, Suite 325  
Boise, Idaho, 83702  
(208) 484-2253  
[daf@fergusondurham.com](mailto:daf@fergusondurham.com)  
[chd@fergusondurham.com](mailto:chd@fergusondurham.com)

Attorneys for Petitioners

William G. Myers  
Alison C. Hunter  
Chris C. McCurdy  
HOLLAND & HART, LLC  
800 W. Main Street, Suite 1750  
Boise, ID 83702-5974  
[wmyers@hollandhart.com](mailto:wmyers@hollandhart.com)  
[achunter@hollandhart.com](mailto:achunter@hollandhart.com)  
[ccmccurdy@hollandhart.com](mailto:ccmccurdy@hollandhart.com)

Attorneys for Intervenor-Respondents

/s/ Megan A. Larrondo  
MEGAN A. LARRONDO  
Deputy Attorney General