

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

robert.berry@ag.idaho.gov

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

**LAWRENCE DENNEY'S VERIFIED
ANSWER TO VERIFIED PETITION
FOR WRIT OF PROHIBITION AND
APPLICATION FOR DECLARATORY
JUDGMENT**

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.

Lawrence Denney, in his official capacity as Secretary of State for the State of Idaho, and the State of Idaho (collectively “Respondents”), hereby answer and respond to the Verified Petition for Writ of Prohibition and Application for Declaratory Judgment (“Petition”) filed May 7, 2021.

I. GENERAL RESPONSE

Unless specifically admitted herein, Respondents deny each and every allegation, claim, and request for relief contained in the Petition.

II. SPECIFIC RESPONSES

In response to the specific allegations, claims, and requests for relief contained in the specific paragraphs in the Petition, Respondents respond as follows:

INTRODUCTION

1. To the extent Petitioners’ Introduction may be construed to contain allegations or requests for relief, Respondents deny that an original action is an appropriate vehicle to resolve Petitioners’ claims, deny that Idaho Code § 34-1805(2) and Idaho Code § 34-1813(2)(a) violate Article III, § 1 of the Idaho Constitution, and deny that Petitioners are entitled to relief.

JURISDICTION

2. In answering paragraph 1, Respondents admit the quoted statements are attributable to the Idaho Constitution, but deny that the Petition is appropriate for the exercise of original jurisdiction or for the issuance of a writ of prohibition.

3. In answering paragraph 2, Respondents deny that Petitioners have accurately stated the Court's original jurisdiction. Additionally, Respondents deny that the Court has original jurisdiction for a declaratory judgment that a statute is unconstitutional. Respondents deny that the allegations and the claims for relief in the Petition constitute a Writ of Prohibition under Idaho Rule of Civil Procedure 74 or Idaho Code § 7-402.

4. In answering paragraph 3, Respondents admit that the Petition seeks to challenge the constitutionality of two Idaho statutory provisions, but Respondents deny that the challenged provisions violate Article III, § 1 of the Idaho Constitution.

5. In answering paragraph 4, Respondents deny that the Petitioners have no other adequate remedy at law, that the undefined body that Respondents refer to as "the people" needs clarity from this Court as to the constitutionality of these statutory provisions, that the issue raised in the Petition as presented by Petitioners is of statewide importance, and that the matter is urgent. The Petitioners' adequate and proper remedy at law would be a challenge in the Idaho District Courts.

PARTIES

6. In answering paragraph 5, Respondents admit that Reclaim Idaho is a political action committee registered with the Idaho Secretary of State. Respondents further admit that Emily Strizich, who has identified herself publicly as a co-founder of Reclaim Idaho, is listed as the

contact person for the initiative petition that was assigned the short ballot title “An Initiative to Provide that the State Shall Amend its State Plan to Expand Medicaid Eligibility to Certain Persons” and that the initiative petition qualified to appear on the general election ballot in 2018. Respondents deny that Reclaim Idaho alleges a distinct and palpable injury that is fairly traceable to the challenged requirements in Idaho Code §§ 34-1805(2) and 1813(2). Respondents further admit that Luke Mayville, using the email address reclaimidaho@gmail.com, filed a proposed initiative petition with the Idaho Secretary of State on April 7, 2021. Respondents also admit that Ashley Prince, on behalf of Reclaim Idaho, filed a different proposed initiative petition with the Idaho Secretary of State on April 28, 2021. Respondents are without sufficient information to admit or deny the allegations that pertain to whether Reclaim Idaho is actively pursuing two initiatives for the 2022 election cycle, and, therefore, Respondents deny the same. Respondents further lack sufficient information to admit or deny whether Reclaim Idaho is a grassroots organization designed to protect and improve the lives of working Idahoans, and, therefore, deny the same. Respondents also lack sufficient information as to the subjects of Reclaim Idaho’s advocacy and therefore deny the same. Respondents deny any suggestion that Idaho Code §§ 34-1805(2) and 1813(2) would unreasonably burden Reclaim Idaho’s ability to exercise any constitutional right under Article III, § 1, and Respondents deny that Reclaim Idaho has standing to pursue this case on behalf of the people of Idaho.

7. In answering paragraph 6, Respondents admit that Committee to Protect and Preserve the Idaho Constitution, Inc. (the “Committee”) is an Idaho non-profit corporation registered with the Idaho Secretary of State. Respondents admit only that the Committee reported in its April 29,

2021 filing with the Idaho Secretary of State that its President is Anthony Park and that W. Anthony Park is a former attorney general of Idaho. Respondents are without sufficient information to admit or deny the allegations pertaining to the composition of the membership of the Committee and their purpose for forming the Committee; and, therefore, Respondents deny the same. Respondents admit that Jim Jones, on behalf of the Committee, filed a proposed referendum petition with the Idaho Secretary of State on April 26, 2021. Respondents lack knowledge as to whether the Committee is actively pursuing the referendum petition for the 2022 election cycle and therefore deny same. Respondents deny that the Committee alleges a distinct and palpable injury that is fairly traceable to the requirements of Idaho Code § 34-1805(2). Respondents further deny that the challenged statutory requirements unreasonably burden the Committee's ability to exercise any constitutional right under Article III, § 1. Finally, Respondents deny that the Committee has standing to pursue this case on behalf of the people of Idaho.

8. In answering the allegations in paragraph 7, Respondents admit that Secretary of State Denney is named in his official capacity as the duly elected Secretary of State. The remainder of this paragraph discusses the contents of Idaho Code; in answer, Respondents state that the relevant provisions speak for themselves.

9. In answering the allegations in paragraph 8, Respondents admit that the State of Idaho is a separate sovereign and one of the fifty states within the United States. The language of the remainder of the paragraph is ambiguous, and Respondents therefore deny same.

///

///

FACTS COMMON TO ALL CLAIMS

10. In answering the allegations in paragraph 9, Respondents state in answer that Idaho Constitution Article 1, § 2 speaks for itself.

11. In answering the allegations in paragraph 10, Respondents admit only that Article III, § 1 was amended to add the ability to hold referenda on acts and measures passed by the legislature and to initiate laws in 1912. Article III, § 1 speaks for itself. Respondents deny that Article III, § 1 contains a right that is independent of the legislature. Rather, under Article III, § 1, the legislature provides the conditions and manner by which the voters may demand referenda and initiate laws.

12. In answering the allegations in paragraph 11, Respondents admit only that Article III, § 1 provides that the legislature may enact the conditions and manner for the voters to demand referenda and initiate laws and that this Court in *Dredge Mining Control-Yes!, Inc. v. Cenarrusa*, 92 Idaho 480, 445 P.2d 655 (1968) held that the “conditions” and “manner” enacted by the legislature need only be reasonable and workable to comply with the Idaho Constitution. Respondents further assert that Article III, § 1 does not contain language that the conditions and manner enacted by the legislature must be reasonable and workable.

13. In answering the allegations in paragraph 12, Respondents deny that the cases cited, *Westerberg v. Andrus*, 114 Idaho 401, 757 P.2d 664 (1998) and *Luker v. Curtis*, 64 Idaho 703, 136 P.2d 978 (1943), stand for the proposition that the people’s and the legislature’s right to enact or repeal legislation stand on equal footing, and Respondents deny the same. Rather, the cases cited in paragraph 12 stand for the proposition that the *laws* passed under the initiative and legislative process stand on equal footing.

14. In answering paragraph 13, Respondents deny that the legislature attempted to enact procedures as a pretext to restrict any right contained in Article III, § 1. Respondents deny that the people have a core right to make and repeal laws outside of the conditions and manner set by the legislature for the process.

15. In answering paragraphs 14 and 15, Respondents state in answer that the Governor's veto message contained in 1915 House Journal speaks for itself.

16. In answering paragraph 16, Respondents are without knowledge of the choices of the legislatures at issue and therefore deny same. Respondents admit only that enabling legislation for the ability to hold referenda and initiate laws under Article III, § 1 was passed in 1915 but vetoed by the Governor and that the legislature first passed enabling legislation that was not vetoed by the Governor in 1933.

17. In answering paragraph 17, Respondents answer that 1933 Idaho Session Law ch. 210 § 5 speaks for itself.

18. In answering paragraph 18, Respondents admit only that Idaho Code § 34-1805 was first enacted in 1933 and next amended in 1997.

19. In answering paragraph 19, Respondents answer that the Governor's veto message contained in the 1984 House Journal speaks for itself. Respondents are without sufficient information to admit or deny the enacting legislature's motivations, and, therefore, deny the same.

20. In answering paragraph 20, Respondents admit that, in 1994, the voters adopted an initiative described as establishing term limits for elected federal, state, county, municipal and school district officials. Respondents are without sufficient information to admit or deny whether

or how the legislature responded to the adoption of the initiative and therefore deny same. Respondents admit only that Idaho Code § 34-1805 was amended in 1997 with 1997 Idaho Session Law ch. 266 § 5. 1997 Idaho Session Law ch. 266 § 5 speaks for itself. Respondents also admit that initiative sponsors may choose to gather more signatures than the required number of signatures and that signatures can be rejected by the county clerks during the signature verification process. Respondents are without sufficient information to admit or deny the remaining allegations in paragraph 20 and, therefore, deny the same.

21. In answering paragraph 21, Respondents answer that 1997 Idaho Session Law ch. 266 § 5 speaks for itself.

22. In answering paragraph 22, Respondents admit that the county-based geographic distribution requirement contained in 1997 Idaho Session Law ch. 266 § 5 was enjoined on November 30, 2001 in *Idaho Coalition United For Bears v. Cenarrusa*, 234 F.Supp.2d 1159 (D. Idaho 2001) because the populations of counties varied widely. The Ninth Circuit affirmed the injunction in *Idaho Coalition United for Bears v. Cenarrussa*, 342 F.3d 1073 (9th Cir. 2003).

23. In answering paragraph 23, Respondents admit only that Idaho law contained no requirement for initiative petition sponsors to gather signatures from any particular geographic distribution within the State of Idaho between November 30, 2001 and 2013.

24. In answering paragraph 24, Respondents admit only that, in 2012, three referenda petitions appeared on the ballot and the voters rejected the three subjects of the petitions at the polls. The three referenda have been described as 1) “Referendum to approve or reject legislation limiting negotiated agreements between teachers and local school boards and ending the practice of issuing

renewable contracts,” 2) “Referendum to approve or reject legislation providing teacher performance pay based on state-mandated test scores, student performance, hard-to-fill positions, and leadership,” and 3) “Referendum to approve or reject legislation amending school district funding, requiring provision of computing devices and online courses for high school graduation.” Respondents admit that, in 2013, the legislature amended Idaho Code § 34-1805 with 2013 Idaho Session Law ch. 214 § 3. 2013 Idaho Session Law ch. 214 § 3 speaks for itself. Respondents are without sufficient information to admit or deny whether the legislature enacted the law in response to the above described referenda, and, therefore, denies the same.

25. In answering paragraph 25, Respondents admit that the initiative petition assigned the short ballot title “An Initiative to Provide that the State Shall Amend its State Plan to Expand Medicaid Eligibility to Certain Persons” qualified for the ballot pursuant to the provisions of Idaho Code § 34-1805 (2013), among other provisions of Idaho Code, in 2018 and was adopted by the voters at the polls with 60.6% of voters voting “yes.” Respondents are without sufficient information to admit or deny the remaining allegations in paragraph 25 and, therefore, deny the same.

26. In answering paragraphs 26, 27, 28, 29, and 30, Respondents are without sufficient information to admit or deny the allegations and, therefore, deny the same.

27. In answering paragraph 31, Respondents deny the same.

28. In answering paragraph 32, Respondents admit only that the legislature in 2019 passed Senate Bill No. 1159. Senate Bill No. 1159 speaks for itself. Respondents deny that the legislature tried to tighten the screws yet again.

29. In answering paragraph 33, Respondents answer that the Governor’s veto message contained in the 2019 Senate Journal speaks for itself.

30. In answering paragraph 34, Respondents admit that the legislature amended Idaho Code § 34-1813(2)(a) in 2020, but Respondents deny that the legislature did so quietly. In responding to the remaining allegations in paragraph 34, Respondents deny that Idaho Code § 34-1813(2)(a) specifically provides for the legislature to repeal any initiated statute before the law has taken effect. Rather, the amendment to Idaho Code § 34-1813(2)(a) merely provides a timeframe for when the initiative will become effective law—a timeframe which is consistent with the date when legislation enacted without an emergency clause becomes effective law.

31. In answering paragraph 35, Respondents admit that Senate Bill No. 1110 was passed in 2021. In answer to the remaining allegations in paragraph 35, Respondents answer that Senate Bill No. 1110 speaks for itself.

32. In answering paragraph 36, Respondents answer that Idaho Code § 34-1805 speaks for itself.

33. In answering paragraph 37, Respondents admit only that Governor Little signed Senate Bill No. 1110 into law, amending Idaho Code § 34-1805. The April 17, 2021 Letter from Governor Little to the President of the Senate, the Honorable Janice McGeachin, contained in the 2021 Senate Journal speaks for itself.

34. In answering paragraph 38, Respondents deny the allegations.

35. In answering paragraph 39, Respondents admit only that Luke Mayville, using the email address reclaimidaho@gmail.com, filed one proposed initiative petition with the Idaho Secretary

of State on April 7, 2021, which was self-described as “The Idaho Initiative Rights Act” and which, if adopted, among other things, would require that initiative petition sponsors obtain signatures of legal voters equal in number to not less than six percent of the qualified electors at the time of the last general election and remove any geographic distribution requirement. The proposed petition stated the intention to have the petition submitted to the voters at the 2022 general election. Respondents further admit that Ashley Prince, on behalf of Reclaim Idaho, filed a different proposed initiative petition with the Idaho Secretary of State on April 28, 2021, which was self-described as “The Quality Education Act,” which would affect education funding and which stated the intention to submit the petition to the voters at the 2022 general election.

36. In answering paragraph 40, Respondents admit only that the self-titled Initiative Rights Act must comply with governing law in order to qualify for the ballot. Respondents also answer that the Certificate of Review issued by the Office of the Attorney General on April 29, 2021 speaks for itself. Respondents are without information sufficient to admit or deny whether Reclaim Idaho is actively pursuing any initiative and moving forward with a signature drive and campaign, and, therefore, Respondents deny the same.

37. In answering paragraph 41, Respondents admit only that Jim Jones, on behalf of the Committee, filed a referendum petition with the Idaho Secretary of State to submit to the qualified electors of the State of Idaho the question of whether to approve or reject Senate Bill No. 1110. Respondents deny that the Committee has not yet received the Certificate of Review from the Office of the Attorney General. The Certificate of Review was transmitted to the Committee on May 18, 2021.

38. In answering paragraph 42, Respondents deny the allegation. Respondents further point out that the allegations in paragraph 42 are entirely speculative and do not constitute factual assertions.

39. In answering paragraph 43, Respondents deny the allegations.

40. In answering paragraph 44, 45, and 46, Respondents deny the allegations. Respondents further point out that the allegations in paragraphs 44, 45, and 46 are entirely speculative and do not constitute factual assertions.

41. In answering paragraph 47, Respondents answer that Idaho Code § 34-1803 and 1802(1) speak for themselves. Respondents deny any inference that the deadline contained in Idaho Code § 34-1803 renders any signature requirement overly burdensome.

42. In answering paragraph 48, Respondents deny the allegations.

43. In answering paragraph 49, Respondents admit that three referenda were on the ballot in 2012, and before 2012, the next most recent referendum to be placed on the ballot was in 2002. Respondents further admit that, in 2012, initiative and referenda petition sponsors were not required to obtain signatures from any specific geographic distribution within Idaho.

44. In answering paragraph 50, Respondents admit only that the Declaration of Robin Nettinga states as much, but Respondents deny the relevant allegations in the Declaration of Robin Nettinga, and, therefore, Respondents deny the same. Respondents further point out that the allegations referenced in paragraph 50 are entirely speculative and do not constitute factual assertions.

45. In answering paragraph 51, Respondents deny the allegations. The requirements of Idaho Code § 34-1805(2) do not give veto power to the voters in any one legislative district.

46. In answering paragraph 52, Respondents deny the allegations.

47. In answering paragraph 53, Respondents lack sufficient information to admit or deny how opponents of an initiative or referendum focus their efforts. Therefore, Respondents deny the allegations in paragraph 53.

48. In answering paragraph 54, Respondents admit only that Idaho Code § 34-1803B(2) was amended on July 1, 2020 by 2020 Idaho Session Law ch. 336 § 2. Idaho Code § 34-1803B(2) speaks for itself. Respondents are without information to admit or deny whether the amendment to Idaho Code § 34-1803B(2) made it easier to remove signatures and therefore deny the same. Idaho Code § 34-1807 speaks for itself.

49. In answering paragraph 55, Respondents admit only that paragraph 55 accurately quotes the declaration of Luke Mayville. Respondents deny the relevant assertions in Luke Mayville's declaration.

50. In answering paragraph 56, Respondents admit only that paragraph 56 accurately quotes the declaration of Professor Moncrief. Respondents deny the relevant assertions in Professor Moncrief's declaration.

51. In answering paragraph 57, Respondents admit only that paragraph 57 accurately quotes the declaration of Ben Ysursa. Respondents deny the relevant assertions in Ben Ysursa's declaration.

///

///

///

CLAIMS FOR RELIEF

I.

52. To the extent Petitioners' prefatory paragraph to Count I of their Claims for Relief may be construed as allegations or requests for relief, Respondents deny the allegations and deny that Petitioners are entitled to any requested relief.

53. In answering paragraph 58, Respondents incorporate the preceding responses to all paragraphs in the Petition.

54. In answering paragraph 59, Respondents deny the allegations.

55. In answering paragraph 60, Respondents deny the allegations.

56. In answering paragraph 61, Respondents deny the allegations.

57. In answering paragraph 62, Respondents deny the allegations.

58. In answering paragraph 63, Respondents deny the allegations.

59. In answering paragraph 64, Respondents deny the allegations.

60. In answering paragraph 65, Respondents deny the allegations.

61. In answering paragraph 66, Respondents admit only that Idaho Code § 34-1823 contains the quoted severability clause. Idaho Code § 34-1823 speaks for itself.

62. In answering paragraph 67, Respondents deny that Petitioners are entitled to the requested relief. Respondents further answer that the requested relief is contrary to Article III, § 1's provision that the legislature sets the conditions and manner for the referenda and initiative process.

63. In answering paragraph 68, Respondents deny that Petitioners are entitled to the requested relief, and Respondents deny that any portion of the statute is unconstitutional. Respondents further

answer that the requested relief is contrary to Article III, § 1's language that the legislature sets the conditions and manner for the referenda and initiative process.

II.

64. To the extent Petitioners' prefatory paragraph to Count II of their Claims for Relief may be construed as allegations or requests for relief, Respondents deny the allegations and deny that Petitioners are entitled to any requested relief.

65. In answering paragraph 69, Respondents incorporate the preceding responses to all paragraphs in the Petition.

66. In answering paragraph 70, Respondents answer that Article III, § 1 speaks for itself. Respondents deny that the right to demand referenda and initiate laws is independent of the legislature. Rather, under Article III, § 1, the legislature provides the conditions and manner by which the voters may hold referenda or initiate laws.

67. In answering paragraph 71, Respondents deny that the people's and the legislature's right to enact or repeal legislation stand on equal footing. Rather, as explained in *Westerberg v. Andrus*, 114 Idaho 401, 757 P.2d 664 (1998) and *Luker v. Curtis*, 64 Idaho 703, 136 P.2d 978 (1943), the laws that are passed under the initiative and legislative process stand on equal footing.

68. In answering paragraph 72, Respondents deny the allegations.

69. In answering paragraph 73, Respondents deny the allegations.

70. In answering paragraph 74, Respondents admit only that the legislature has the power under Article III, § 1 to enact reasonable conditions and manner requirements that govern the initiative and referendum process. Respondents deny the remaining allegations.

71. In answering paragraph 75, Respondents deny that Petitioners are entitled to the requested relief.

PRAYER FOR RELIEF

72. In answering Petitioners' Prayer for Relief, Respondents deny that Petitioners are entitled to the requested relief in paragraphs (a) through (g).

III. AFFIRMATIVE DEFENSES

FIRST DEFENSE

The Petition fails to state a claim upon which relief may be granted.

SECOND DEFENSE

Petitioners have a plain, speedy and adequate remedy in the ordinary course of law.

THIRD DEFENSE

This matter is not urgent.

FOURTH DEFENSE

Petitioners do not have standing to assert any claims for relief for other voters or organizations.

FIFTH DEFENSE

Petitioners lack standing to pursue claims on their own behalf.

SIXTH DEFENSE

Petitioners' claims for relief violate the Idaho Legislature's right to determine the conditions and manner of the initiative and referendum process as set forth in Article III, § 1 of the Idaho Constitution.

SEVENTH DEFENSE

Petitioners' claims for relief are inconsistent with and unsupported by Idaho law.

EIGHTH DEFENSE

Petitioners do not bring a proper Writ of Prohibition under Idaho Rule of Civil Procedure 74 and Idaho Code § 7-402.

NINTH DEFENSE

This Court lacks jurisdiction to consider the Petition.

TENTH DEFENSE

Petitioners are not entitled to attorney fees.

WHEREFORE, having fully answered the Petition, Respondents request that the Court enter an order and judgment

1. Dismissing the Petition with prejudice; and
2. Providing such relief as it deems appropriate and just.

DATED this 2nd day of June, 2021.

STATE OF IDAHO
OFFICE OF THE ATTORNEY GENERAL

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

///

///

///

DATED this 2nd day of June, 2021.

STATE OF IDAHO
OFFICE OF THE ATTORNEY GENERAL

By: /s/ Robert A. Berry
ROBERT A. BERRY
Deputy Attorney General

DATED this 2nd day of June, 2021.

STATE OF IDAHO
OFFICE OF THE ATTORNEY GENERAL

By: /s/ Cory M. Carone
CORY M. CARONE
Deputy Attorney General

VERIFICATION

STATE OF IDAHO)
) ss.
County of Ada)

Lawrence Denney, Secretary of State for the State of Idaho, being first duly sworn, deposes and says:

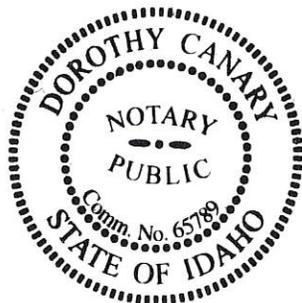
I have read the foregoing Verified Answer to Verified Petition for Writ of Prohibition and Application for Declaratory Judgment and know the contents thereof, and the same are true to the best of my knowledge and belief.

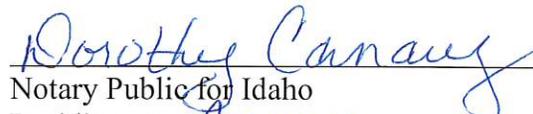
DATED this 2nd day of June, 2021.



LAWRENCE DENNEY

SUBSCRIBED AND SWORN to before me this 2nd day of June, 2021.





Notary Public for Idaho
Residing at: Canyon
My Commission Expires: 6-17-2027

CERTIFICATE OF SERVICE

I certify that on this 2nd day of June, 2021, I served 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
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
achunter@hollandhart.com
ccmccurdy@hollandhart.com

Attorneys for Intervenor-Respondents

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