ARIZONA SUPREME COURT

KARI LAKE, *Plaintiff-Contestant/Appellant*, v. KATIE HOBBS, personally as Contestee; *Defendant-Contestee/Appellee* ADRIAN FONTES, in his official capacity as Secretary of State; STEPHEN RICHER, in his official capacity as Maricopa County Recorder; Bill Gates, Clint Hickman, Jack Sellers, Thomas Galvin, Steve Gallardo, in their official capacities as members of the Maricopa County Board of Supervisors; Scott Jarrett, in his official capacity as Maricopa County Director of Elections; and the Maricopa County Board of Supervisors, *Defendants/ Appellees*.	No. _____ Court of Appeals Division Two No. 2CA-CV23-0144 Transferred from Court of Appeals Division One No. 1CA-CV23-0393 Maricopa County Superior Court No. CV2022-095403

PETITION FOR REVIEW

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PETITION FOR REVIEW

This election challenge returns to this Court after trial of Lake's remanded signature-verification claim. Lake also appeals the denial of her motion for relief from judgment under Rule 60(b)(2), (3), and (6) based on new information showing that, contrary to Maricopa's claims of an "Election Day hiccup," nearly two-thirds of Maricopa's 446 vote center tabulators failed on a massive scale—averaging over 7,000 ballot rejections every thirty minutes shortly after polls opened to polls closing. Tabulator system log ("SLOG") files showed two things. First, contrary to Maricopa's testimony, Maricopa did not conduct pre-election logic and accuracy ("L&A") testing required by A.R.S. § 16-449(A) and the 2019 Elections Procedures Manual ("EPM") on any vote center tabulators used on Election Day. There is no assurance that Election Day ballots were correctly counted. Second, Maricopa conducted unannounced non-statutorily complaint testing on vote center tabulators, with the SLOG files recording that 260 of the 446 tabulators rejected ballots with the same error codes that arose on Election Day. In short, Maricopa had advance notice that tabulators would reject ballots on Election Day and did nothing to fix it. Division Two affirmed the trial court's denial of Lake's Rule 60(b) Motion which was error.

With respect to Petitioner's signature-verification claim that was tried, Maricopa's keystroke logs showed that its signature reviewers compared 275,000+ early ballot signatures with record signatures in under three seconds per signature, and 70,000 signatures in under ***two seconds*** per comparison. Petitioner's expert testified, and

common sense dictates, that it is impossible to "compare" ballot-envelope signatures with record signatures, as required by A.R.S. § 16-550(A) and Maricopa's stated signature procedures at those speeds.

This Court should review the important election-integrity issues presented here. The 2022 election was irredeemably flawed. Without this Court's intervention, future elections remain threatened.

ISSUES PRESENTED FOR REVIEW

1. Did Petitioner meet the requirements to establish relief from judgment under Rule 60(b)(2), (3), or (6)?
2. Does failure to conduct L&A testing on its vote-center tabulators under A.R.S. § 16-449(A) and the EPM constitute misconduct under A.R.S. § 16-672(A)(1)?
3. Does signature verification performed at humanly impossible speeds satisfy A.R.S. § 16-550(A)'s requirement to "compare" voter signatures?
4. Do Maricopa's violations of § 16-672(A) warrant setting aside or reversing the 2022 gubernatorial election under A.R.S. § 16-676(B)?

FACTUAL BACKGROUND

The facts appear in the transcripts, declarations, and documents in the Appendix ("Appx") and are summarized here.

L&A Testing

Arizona law mandates that counties conduct L&A testing on "all of the county's deployable voting equipment," including using ballots printed using ballot-on-demand

("BOD") printers at Maricopa's 223 vote centers, "to ascertain that the equipment and programs will correctly count the votes cast for all offices and on all measures." A.R.S. § 16-449(A); 2019 EPM 94-95 (Appx: 109-10).

On Election Day, Maricopa vote centers experienced ballot-reading errors—rejecting an average of over 7,000 ballots ***every 30 minutes*** from shortly after polls opened until polls closed—causing massive lines and wait times, interfering with the voting rights of tens of thousands of predominately Republican voters. Parikh Decl. ¶¶ 46-48 (Appx:163-65). Maricopa downplayed the chaos as an "Election Day hiccup." Transcript 217:14-19 (Dec. 22, 2022) (Appx:115).

Lake moved for relief from judgment on Count II based on Maricopa's failure to perform L&A testing on the 446 vote-center tabulators used on Election Day based on a meticulous examination of Maricopa's SLOG files from the 2022 election by cyber experts. Parikh Decl. ¶ 4 (Appx:142-43). During briefing, Maricopa revealed ***seven months after the fact***, that—without any public announcement, ***after*** the tabulators were purportedly certified on October 11, 2022—Maricopa ***broke*** the "tamper evident seals" on all 446 vote-center tabulators and removed, reformatted, and replaced the memory cards between October 14-18, 2022, for all vote-center tabulators used on Election Day. Jarrett Decl. ¶¶ 14-15 (Appx:190-91).

The SLOG files show Maricopa began unannounced "testing" three days after Maricopa and the Secretary certified the tabulators following purported statutorily-compliant L&A testing on October 11, finding that 260 of the 446 tabulators

experienced the same "Ballot Misread" and "Paper-Jam" error codes that arose on Election Day. Parikh Decl. ¶¶ 8(a)-(d), 11-25, 30, 46-48, Exhibit 1 (Appx:144-50, 154, 163-65); Jarrett Decl. ¶¶ 14-15 (Appx:190-91). In other words, Maricopa knew about the impending ballot-reading errors and did nothing. Indeed, altering election equipment would have required new L&A testing under A.R.S. § 16-449(A). Conducting statutorily-compliant L&A testing on Maricopa's 446 newly reformatted vote-center tabulators would have detected and corrected the ballot-reading errors that caused the Election Day chaos.

Signature Verification

Count III alleged signature mismatches on a material number of early ballots that Maricopa improperly tabulated. Compl. ¶ 151 (Appx:87). Lake objected to the 275,000+ ballots that—based on keystroke evidence—Maricopa verified in under three seconds, too quickly to compare signatures pursuant to A.R.S. § 16-550(A).

Maricopa purports to train signature-verification workers in a "robust process" of evaluating "100% of signatures" for any combination of dissimilarities across six "broad characteristics," with five additional "local characteristics" if needed. Maricopa County Election Department, Signature Verification, General Election 2022, 18 (Appx:303) ("MSVG"). Under the Secretary's Signature Verification Guide ("SVG"), Maricopa's Election Plan, and Maricopa's own guidance, "compare" means—***at least***—evaluating signatures for consistency across six broad characteristics. *Id.*; SVG

§§ B-D (Appx:198-205); Election Plan 45 (Appx:261). A "24/7 live video" feed furthered Maricopa's façade of rigor. Election Plan 8 (Appx:224).

Maricopa's Elections Director Valenzuela testified that signature reviewers need review the SVG characteristics only for questioned signatures. Transcript 87:6-19 (May 17, 2023) (Appx:121). Lake's signature expert testified not only on what comparisons require qualitatively but also about keystroke evidence that Maricopa compared over 70,000 ballots in 0-2 seconds and 205,000+ in 2-3 seconds, speeds at which comparison is humanly impossible. Transcript 10:16-11:22, 12:7-13:16, 63:14-67:12 (May 18, 2023) (Appx:127-30, 136-40).

STANDARD OF REVIEW

Appellate courts review legal questions *de novo*. *Fitzgerald v. Myers*, 243 Ariz. 84, 88 ¶ 8 (2017). Following bench trials, courts defer to trial courts' factual findings unless clearly erroneous, *Ariz. Bd. of Regents v. Phx. Newspapers*, 167 Ariz. 254, 257 (1991), but apply *de novo* review to factual findings induced by legal error and to mixed fact-law questions "when there is an error as to law." *Id.*

Courts review rulings under Rule 60(b) for abuse of discretion, but trial courts may "not act arbitrarily or inequitably, nor… make decisions unsupported by facts or sound legal policy." *City of Phoenix v. Geyler*, 144 Ariz. 323, 328-29 (1985). On questions "of law or logic," appellate courts have "final responsibility … to 'look over the shoulder' of the trial judge and, if appropriate, substitute [their] judgment for his or

hers." *State v. Chapple*, 135 Ariz. 281, 297 n.18 (1983), *abrogated in part on other grounds*, A.R.S. § 13-756(A).

REASONS PETITION SHOULD BE GRANTED

I. DIVISION TWO ERRED IN DENYING RELIEF ON L&A TESTING.

Lake's Rule 60(b) motion showed that Maricopa failed to perform statutorily-compliant L&A testing on its deployed vote-center tabulators, and even conducted post-alteration testing that predicted the Election Day chaos. Division Two affirmed the denial of relief by holding—incorrectly—that Lake's new evidence and arguments did not fit within Rule 60(b)(2)-(3) or (b)(6).

A. Lake is entitled for relief from judgment under Rule 60(b).

The following three subsections establish Lake's entitlement to relief under Rules 60(b)(2)-(3) and (b)(6). Although the three Rules have slightly different tests, all three require material or outcome-altering impacts. *Boatman v. Samaritan Health Servs., Inc.*, 168 Ariz. 207, 212 (App. 1990); *Estate of Page v. Litzenburg*, 177 Ariz. 84, 93 (App. 1993); *Amanti Elec., Inc. v. Engineered Structures, Inc.*, 229 Ariz. 430, 431-32, ¶¶ 6-8 (App. 2012). Although Rule 60(b)(3) shifts the burden ***to nonmovants*** for ***intentional*** misconduct, *Estate of Page*, 177 Ariz. at 93, this Court need not reach Maricopa's intentionality. Given the outcome-altering nature of Lake's Rule 60(b) evidence, *see* Sections I.B, *infra*, either Maricopa did not meet ***its burden*** or the burden remained with Lake but Maricopa cannot contest materiality. Either way, Lake's motion fits within Rule 60(b).

1. "New" evidence exists under Rule 60(b)(2).

Division Two held that Lake's evidence was not "new" under Rule 60(b)(2) because (a) she had the unanalyzed SLOG files at the time of trial, (b) post-trial analyses did not exist at the time of trial, and (c) the evidence was merely cumulative of trial evidence. Decision ¶¶ 24-26 (Appx:14-16). All three rationales are erroneous.

Division Two's first two holdings misapply Rule 60(b)(2). While "newly discovered" evidence cannot include ***post-judgment*** evidence, Bennett Evan Cooper *et al.*, ARIZONA TRIAL HANDBOOK § 33:31; *Birt v. Birt*, 208 Ariz. 546, 549 ¶ 11 (App. 2004) (post-judgment bankruptcy); *OPI Corp. v. Pima Cnty.*, 176 Ariz. 625, 626-27 (Tax 1993) (missed post-judgment payment), "new" encompasses ***post-judgment discussions*** of ***pre-judgment facts***. *See*, *e.g.*, *Trendsettah USA, Inc. v. Swisher Int'l, Inc.*, 31 F.4th 1124, 1128-29 (9th Cir. 2022) (post-judgment indictment illuminating pre-judgment conduct); *Chilson v. Metropolitan Transit Authority*, 796 F.2d 69, 72 (5th Cir. 1986) (post-judgment audit of pre-judgment activity); *Nat'l Anti-Hunger Coal. v. Exec. Comm. of President's Private Sector Survey on Cost Control*, 711 F.2d 1071, 1075 n.3 (D.C. Cir. 1983) (post-judgment reports about pre-judgment actions); MOORE'S FEDERAL PRACTICE—CIVIL § 60.42.

Rule 60(b)(2) thus includes post-judgment analysis of pre-judgment conduct. For example, the Ninth Circuit held that plaintiffs' receiving piecemeal evidence of tax evasion in hundreds of invoices, tax filings, and cancelled checks prior to judgment did not preclude their citing post-judgment testimony of pre-judgment tax evasion to show

damages. *Trendsettah*, 31 F.4th at 1137. Lake's new analysis of pre-judgment facts fits within Rule 60(b)(2).

Division Two's third holding is a *non sequitur*. The trial court rejected Lake's L&A-testing claim as improperly amending Count II over what she argued in 2022 which Division Two held was error. Under Advisement Ruling 6 (May 15, 2023) (Appx:100) ("UAR"); Decision ¶ 21 (Appx:14). Lake's evidence that Maricopa failed to conduct L&A testing was a new argument under her existing Count II. There is nothing "cumulative" about that.

a. The SLOG-file analysis is "new."

The SLOG files predate the judgment, Parikh Decl. ¶ 6 (Appx:143-44), and thus are temporally eligible under Rule 60(b)(2). Moreover, Lake's cyber and legal team diligently analyzed over thirty million lines (~30,192,847) of SLOG entries over the course of several months, involving several thousand man-hours in data analysis, research, and testing before timely bringing the Rule 60 Motion. *Id.* The SLOG-file analyses show that Maricopa:

- Did not conduct statutory L&A testing on October 11, 2022, in violation of A.R.S. § 16-449;
- Altered all 446 vote-center tabulators by installing reformatted memory cards in the days following Maricopa's and the Secretary's purported L&A testing and certification on October 11, 2022;

- Conducted unannounced testing between October 14-18, 2022, on those 446 tabulators with 260 of them rejecting ballots with the same error codes as occurred on Election Day; and
- Had advance notice that vote-center tabulators would reject ballots on Election Day, which impacted nearly two-thirds of Maricopa's 223 vote centers.

Parikh Decl. ¶¶ 6, 8, 11-14, 17-24, 29-30, 46-48 (Appx:143-50, 153-54, 163-65).

b. Jarrett's admissions and Lake's other post-judgment evidence are "new."

Although the Jarrett declaration post-dated the judgment, its admissions concern pre-judgment facts. As explained in Section I.A.1, *supra*, post-judgment analyses of pre-judgment facts qualify as "new" for Rule 60(b)(2). Similarly, the other post-judgment evidence on which Lake relied to establish pre-judgment facts also are new. *See* Parikh Decl. ¶¶ 27-28, 33-37, 44, 49 (Appx:151-53, 156-59, 162, 165-66).

2. "Misconduct" exists under Rule 60(b)(3).

Under Rule 60(b)(3), "[m]isconduct … need not amount to fraud" and "may include even accidental omissions." *Estate of Page*, 177 Ariz. at 93. While implicitly rejecting the trial court's requiring scienter, Division Two held that Lake did not show misconduct under Rule 60(b)(3) holding (a) Lake's evidence concerns ***election*** misconduct (*e.g.*, the failure to conduct L&A testing), not ***litigation*** misconduct; and (b) Lake does not establish how Maricopa's misrepresentations about her records requests impaired her ability to present her claims. Decision ¶¶ 33-35 (Appx:19-20).

Lake's Rule 60 evidence showed two events of Maricopa's misconduct under A.R.S. § 16-672(A)(1), Maricopa's: (1) failure to conduct statutory L&A testing on its 446 deployed vote-center tabulators. Parikh Decl. ¶¶ 8(a), 9-19, 48-49 (Appx:144-49, 164-66); and (2) knowledge that 260 of 446 tabulators rejected ballots during the unannounced testing between October 14-18, and failure to correct those failures. *Id.* ¶¶ 8(b)-(d), 20-25, 30 (Appx:144-45, 149-50, 154). With respect to Rule 60(b)(3), Lake showed that, related to the election misconduct described *supra*, Maricopa: (1) gave false testimony that statutorily compliant L&A testing had been properly performed. *See*, *e.g.*, Transcript 52:17-24 (Dec. 21, 2022) (Appx:112); and (2) improperly withheld requested SLOG files that would have further revealed Maricopa's violations and falsely testified as to the scope of Lake's request. *compare* Jarrett Decl. ¶ 14 (Appx:190-91) (false testimony that Lake had not requested system log files "predating October 14.") *with* Letter from Timothy La Sota to Bill Gates (Nov. 28, 2022) (Appx:194) (letter requesting "All tabulator logs" and all "S-logs").

Thus, Maricopa testified falsely and argued misleadingly about its violations of election law throughout this litigation. If Maricopa had properly conducted L&A testing as it falsely testified it had, the testing would have identified—and thus prevented—the 2022 Election Day chaos. A.R.S. § 16-449(A) (requiring errorless test); *see also* Parikh Decl. ¶¶ 15-16, 23-25, 30 (Appx:146-47, 150, 154). Alternatively, if Maricopa had not falsely testified that it conducted L&A testing, Lake could have presented this issue

during the December 2022 bench trial—before the gubernatorial term began—and in her first appeal.

3. Rule 60(b)(6) applies if Rules 60(b)(2)-(3) do not.

Division Two agreed that Rule 60(b)(6)'s catch-all covers extraordinary circumstances but held that Lake failed to meet that bar. Decision ¶ 37 (Appx:21). Division Two ignored the issues that Lake presents here (*i.e.*, failure to conduct L&A testing, installing reformatted tabulator memory cards after certifying purported L&A testing, advance notice of the Election Day chaos). *Id.* The trial court also ignored these issues, UAR 6 (Appx:100), so ***no court*** reviewed Lake's claim that Maricopa's altered tabulators resulted in an illegally conducted election and Maricopa's subsequent coverup triggered Rule 60(b)(6). This was error for two reasons.

First, if Rules 60(b)(2)-(b)(3) do not apply, then Rule 60(b)(6) can apply. Together—or ***even separately***—the new evidence presented here qualifies as exceptional. *Reynolds v. Sims*, 377 U.S. 533, 562 (1964) ("the political franchise of voting [is] a fundamental political right, because preservative of all rights") (cleaned up). Election officials should not willfully harm the electorate.

Second, Jarrett's deceitful responses, admissions like the Jarrett declaration, as well as potentially engineered Election Day chaos, all meet the alternate exceptional-circumstance Rule 60(b)(6). *See Amanti Elec.*, 229 Ariz. at 433, ¶ 10. By failing to consider ***these issues*** and Maricopa's failure to conduct L&A testing under Rule 60(b)(6), Division Two and the trial court abused their discretion. *Grant v. Ariz. Pub. Serv. Co.*,

133 Ariz. 434, 456 (1982) (reaching "discretionary conclusion … without consideration of the evidence" abuses discretion); *cf. United States v. Taylor*, 487 U.S. 326, 336 (1988) (discretion bound by "sound legal principles").

B. Lake's new evidence establishes Maricopa's material wrongdoing.

Maricopa's multiple overlapping shortcomings are material because L&A testing requires an errorless count before tabulators and software are approved. A.R.S. § 16-449(A). By the express terms of A.R.S. § 16-449(A) (and the EPM), Maricopa's failure to conduct statutorily compliant L&A testing, means there is no way to know if Election Day ballots were "correctly count[ed]." Disregarding such nontechnical requirements requires setting aside the election. *Miller v. Pichaco Elementary School District No. 33*, 179 Ariz. 178, 180 (1994); *Reyes v. Cuming*, 191 Ariz. 91, 94 (App. 1998). L&A testing would also have identified the impending chaos ***before*** Election Day. Indeed, 71% of vote centers had failure rates exceeding 20%, with 24% having failure rates exceeding 60%, wildly over the permissible certification failure rate (0.2%). *See* Parikh Decl. ¶ 48 (Appx:164-65). Thus, "the dangers were the very ones the statute was designed to prevent." *Miller*, 179 Ariz. at 180.

The issue here is not whether ***some*** unspecified "tabulators" underwent L&A testing on October 11, 2022. The issue is whether ***all vote-center tabulators*** used on Election Day underwent the statutorily required L&A testing. A.R.S. § 16-449(A); 2019 EPM 94-95 (Appx:109-10). Significantly, the SLOG files "document[] all tabulator activity for the election project, including all testing through the close of polls on

Election Day." Parikh Decl. ¶ 17 (Appx:147-48). The SLOG files demonstrate that Maricopa did not subject ***any***, much less ***all***, vote-center tabulators ***used on Election Day*** to the statutorily required L&A testing on October 11, 2022. *Id.* ¶¶ 6, 8(a), 11-14, 17-19 (Appx:143-44, 146-49).

C. Maricopa's material wrongdoing nullifies presumptions afforded to election officials.

Although Division Two distinguished between ***election*** misconduct under A.R.S. § 16-672 and ***litigation*** misconduct under Rule 60(b)(3), Decision ¶ 29 (Appx:17), the lower courts failed to consider that Lake's new evidence of election misconduct vitiated the presumptions that courts typically apply to election officials: "Whenever evidence contradicting a legal presumption is introduced the presumption vanishes." *Silva v. Traver*, 63 Ariz. 364, 368 (1945); *Golonka v. GMC*, 204 Ariz. 575, 589-90, ¶ 48 (App. 2003). Absent statutes or rules, default principles apply to presumptions. Ariz.R.Evid. 301. Evidence of Maricopa's election misconduct thus required reassessing prior holdings without presumptions favoring Maricopa.

II. DIVISION TWO ERRED IN DENYING RELIEF ON SIGNATURE VERIFICATION.

Signature comparison "guarantees that the absentee ballots are being cast by the registered voters and prevents fraud and ballot tampering." *Reyes*, 191 Ariz. at 93. *Reyes* held this statutory purpose—"to prevent the inclusion of invalid votes"—made § 16-550(A) a "non-technical statute" that required actual compliance, not substantial compliance. *Id.* at 94. Maricopa's signature verifiers approved an outcome-

determinative number of ballots too quickly to compare the signatures for ***those ballots***: "Without the proper signature of a registered elector on the outside, ***an*** absentee ballot is void and may not be counted." *Id.* (emphasis added); *see* Compl. ¶ 151 (alleging "***material number*** of early ballots" were not properly verified) (Appx:87) (emphasis added).

Division Two affirmed the trial court on the signature-verification count for two primary reasons: (a) A.R.S. § 16-550(A) did not compel a particular mode of comparing signatures; and (b) clear-error review supported the trial judge's favoring Hobbs' witnesses over Lake's expert and evidence. Decision ¶¶ 48-49 (Appx:164-66). Division Two erred for several reasons.

First, *de novo* review applied not only to the legal issues under § 16-550(A) and *Reyes* but also to the related mixed fact-law questions. This error permeates—and invalidates—the lower courts' signature-verification analyses.

Second, the lower courts incorrectly viewed § 16-550(A) as lacking enforceable standards. Although the statute does not define "compare," the dictionary does. *Planned Parenthood Arizona, Inc. v. Mayes*, ___ Ariz. ____, ¶ 16 (2024) (statutory phrases have ordinary meaning absent contrary context); *cf.* Decision ¶ 48 (Appx:25) ("'compare' means: '[t]o examine in order to note the similarities or differences of.'"). Likewise, Maricopa's policies and training materials, which require examination of signatures' consistency across 6-11 specified characteristics. MSVG 18 (Appx:303); Election Plan 45 (Appx:261). Examinations take time—not much time in some cases, but enough to

let courts assess whether actual comparisons really occurred. The lower courts improperly disregarded Lake's keystroke-log evidence and the expert testimony summarizing it under A.R.S. § 16-550(A).

Without judicially manageable standards, courts sometimes find statutory compliance unreviewable. *Ariz. Indep. Redistricting Comm'n v. Brewer*, 229 Ariz. 347, 351, ¶ 18 (2012). That limitation does not apply, however, if courts can rely on familiar interpretive principles, *id.* at 355, ¶ 35, or when regulations or guidance cabin otherwise-standardless statutory discretion. *Physicians for Soc. Responsibility v. Wheeler*, 956 F.3d 634, 643 (D.C. Cir. 2020). Judicial review allows challenging government's failure to follow its own procedures. *Clay v. Ariz. Interscholastic Ass'n*, 161 Ariz. 474, 476 (1989) ("an agency must follow its own rules and regulations; to do otherwise is unlawful"); *Service v. Dulles*, 354 U.S. 363, 372 (1957). Accordingly, Maricopa did not "compare" the 275,000+ ballots that its reviewers processed at humanly impossible speeds under A.R.S. § 16-550(A).

Third, the trial court improperly evaluated evidence under presumptions favoring Maricopa. *See* Section I.C, *supra*.

Fourth, Valenzuela's testimony from his own limited experience logically cannot contradict Maricopa's log-file evidence showing 275,000+ early ballots approved at near-100% rates in under 3 seconds, too quickly for human comparison of broad and narrow signature characteristics. Valenzuela did not claim to have reviewed those 275,000+ ballots, so his testimony cannot extrapolate to justify ***all*** 275,000+ ballots that

Lake identified as unverified using Maricopa's own log files and verification policies. The lower courts' rejection of Lake's evidence flowed from the three prior errors listed here.

With *de novo* review, remand is unnecessary. If this Court mandates proper standards for signature comparisons and denies Maricopa favorable presumptions, reversal must follow. The Court could either set aside the election or proportionally strike 275,000 ballots under *Grounds v. Lawe*, 67 Ariz. 176, 183-85 (1948). Because Hobbs eclipsed Lake by more than 10% of Maricopa's early voting, under *Grounds*, Lake would win.

CONCLUSION

The Petition for Review should be granted.

Dated: July 11, 2024

Respectfully submitted,

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