

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION**

Missouri Protection & Advocacy Services, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No.: 2:22-cv-04097
	)	
John R. Ashcroft, et al.,	)	
	)	
Defendants.	)	

**ANSWER OF DEFENDANT KANSAS CITY BOARD OF ELECTION  
COMMISSIONERS TO COMPLAINT FOR DECLARATORY  
AND INJUNCTIVE RELIEF**

Defendants, the Kansas City Board of Election Commissioners (“KCEB”) for its answer to Plaintiffs’ Complaint for Declaratory and Injunctive Relief, states as follows:

**Introduction**

1. Defendant KCEB admits that Plaintiffs’ Complaint is an action seeking declaratory and injunctive relief to enforce the Voting Rights Act of 1965, 52, U.S.C. § 10508 (“VRA”) and states that Paragraph 1 of Plaintiffs’ Complaint does not contain factual allegation that requires a response from Defendant KCEB.

2. Paragraph 2 of Plaintiffs’ Complaint states a legal conclusion, which does not require a response from Defendant KCEB. To the extent a response is required, Defendant KCEB states that the VRA speaks for itself.

3. Paragraph 3 of Plaintiffs’ Complaint states legal conclusions which do not require a response from Defendant KCEB. To the extent a response is required, Defendant KCEB states that the VRA speaks for itself.

4. Paragraph 4 of Plaintiffs' Complaint states legal conclusions which do not require a response from Defendant KCEB. To the extent a response is required, Defendant KCEB states that the VRA speaks for itself.

5. Paragraph 5 of Plaintiffs' Complaint states legal conclusions which do not require a response from Defendant KCEB. To the extent a response is required, Defendant KCEB states that the Missouri Revised Statute § 115.445 speaks for itself.

6. Paragraph 6 of Plaintiffs' Complaint states legal conclusions which do not require a response from Defendant KCEB. To the extent a response is required, Defendant KCEB states that the Missouri Revised Statute § 115.445 speaks for itself.

7. Paragraph 7 of Plaintiffs' Complaint states legal conclusions which do not require a response from Defendant KCEB. To the extent a response is required, Defendant KCEB states that the Missouri Revised Statute §§ 115.445, 115.635.8, and 115.291.1 speak for themselves.

8. Paragraph 8 of Plaintiffs' Complaint states legal conclusions which do not require a response from Defendant KCEB. To the extent a response is required, Defendant KCEB states that the Missouri Revised Statute §§ 115.445 and the VRA speaks for themselves and denies the remaining allegations of Paragraph 8 of Plaintiffs' Complaint to the extent such allegations are inconsistent with Missouri law.

9. Defendant KCEB states it is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 9 of Plaintiff's Complaint.

10. Defendant KCEB states it is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 10 of Plaintiff's Complaint

11. Defendant KCEB states it is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 11 of Plaintiff's Complaint.

12. Defendant KCEB states it is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 12 of Plaintiff's Complaint.

13. Paragraph 13 of Plaintiffs' Complaint states legal conclusions which do not require a response from Defendant KCEB. To the extent a response is required, Defendant KCEB states that the federal law and Missouri Revised Statute §§ 115.445.3 speak for themselves.

14. Defendant KCEBs admit that Plaintiffs' Complaint is an action seeking declaratory and injunctive relief to enforce the VRA and states that Paragraph 14 of Plaintiffs' Complaint does not contain factual allegations that require a response from Defendant KCEB.

#### **Jurisdiction and Venue**

15. Defendant KCEB admits the allegations of Paragraph 15 of Plaintiffs' Complaint.

16. Defendant KCEB admits the allegations of Paragraph 16 of Plaintiffs' Complaint.

17. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 17 of Plaintiffs' Complaint.

18. Defendant KCEB admits that Defendant John R. Ashcroft in his official capacity as Missouri Secretary of State is located in Cole County, Missouri and that Defendant Boone County Clerk is located in Boone County Missouri but is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 18 Plaintiffs' Complaint.

#### **Parties**

19. Defendant KCEB admits that Plaintiff Missouri Protection and Advocacy ("Mo P&A") claims that it is a statewide not-for-profit organization, but states that it is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 19 of Plaintiffs' Complaint.

20. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 20 of Plaintiffs' Complaint.

21. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 21 of Plaintiffs' Complaint.

22. Defendant KCEB admits that Plaintiff VozKC claims that it is a volunteer organization located in Kansas City, Missouri, but states that it is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 22 of Plaintiffs' Complaint.

23. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 23 of Plaintiffs' Complaint.

24. Defendant KCEB admits that Plaintiff Susana Elizarrara is a registered voter who lives in Kansas City, Missouri, but states that it is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 24 of Plaintiffs' Complaint.

25. Defendant KCEB admits that Plaintiff Manuel Rey Abarca IV is a registered voter who lives in Kansas City, Missouri, but states that it is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 25 of Plaintiffs' Complaint.

26. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 26 of Plaintiffs' Complaint.

27. Defendant KCEB admits that the Defendant John Ashcroft is the Secretary of State of Missouri and that the Secretary of State is the chief election official of the State of Missouri and states that Defendant Ashcroft's duties and responsibilities as Secretary of State are

legal conclusions to which no answer is required. To the extent an answer is required, Defendant KCEB states that the duties and responsibilities of the Missouri Secretary of State are established by Missouri statutes, which speak for themselves.

28. Defendant KCEB admits the allegations of paragraph 28 of Plaintiffs' Complaint and further states that the duties and responsibilities of Defendant KCEB are established by Missouri statutes, which speak for themselves.

29. Defendant KCEB admits that it is the election authority for that portion of the City of Kansas City, Missouri within Jackson County, and that its duties and responsibilities, including to ensure compliance with legal requirements relating to the conduct of elections and supervising judges, are established by Missouri statutes, which speak for themselves.

30. Defendant KCEB admits the statement “[n]o one other than election judges or immediate family may assist more than one voter” appears in certain training materials of the Missouri Secretary of State Elections Divisions, states such published materials speak for themselves, and denies the remaining allegations of paragraph 30 of Plaintiffs' Complaint.

### **Facts**

31. Defendant KCEB admits the allegation of paragraph 31 of Plaintiffs' Complaint.

32. Defendant KCEB admits that for the August 2 Primary Election Missouri early generalized pre-Election Day in-person voting is not offered, states that Mo. Rev. Stat. § 115.277, which becomes effective on August 28, 2022, provides for “generalized pre-Election Day in-person voting” beginning on the second Tuesday prior to an election, and denies the remaining allegations of paragraph 32 of Plaintiffs' Complaint to the extent such allegations are inconsistent with Missouri election statutes.

33. Defendant KCEB admits the allegations of paragraph 33 of Plaintiffs' Complaint.

34. Defendant KCEB admits that each year immigrants in Missouri become naturalized U.S. citizens but is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 34 of Plaintiffs' Complaint.

35. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 35 of Plaintiffs' Complaint.

36. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 36 of Plaintiffs' Complaint.

37. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 37 of Plaintiffs' Complaint.

38. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 38 of Plaintiffs' Complaint.

39. Defendant KCEB admits that some jurisdictions in the United States are required by federal law to provide election materials and assistance in languages other than English, which does not include the KCEB. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 39 of Plaintiffs' Complaint.

40. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 40 of Plaintiffs' Complaint.

41. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 41 of Plaintiffs' Complaint.

42. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 42 of Plaintiffs' Complaint.

43. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 43 of Plaintiffs' Complaint.

44. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 44 of Plaintiffs' Complaint.

45. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 45 of Plaintiffs' Complaint.

46. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 46 of Plaintiffs' Complaint.

47. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 47 of Plaintiffs' Complaint.

48. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 48 of Plaintiffs' Complaint.

#### **Relevant Law**

49. Paragraph 49 of Plaintiffs' Complaint states legal conclusions which do not require a response from Defendant KCEB. To the extent a response is required, Defendant KCEB states that the VRA speaks for itself.

50. Paragraph 50 of Plaintiffs' Complaint states legal conclusions which do not require a response from Defendant KCEB. To the extent a response is required, Defendant KCEB states that the VRA speaks for itself. Paragraph 50 of Plaintiffs' Complaint also references a Senate Committee Report. Defendant KCEB states that the Senate Committee Report speaks for itself and denies the remaining allegations of paragraph 50 of Plaintiffs' Complaint to the extent such allegations are inconsistent with such report.

51. Paragraph 51 of Plaintiffs' Complaint states legal conclusions which do not require a response from Defendant KCEB. To the extent a response is required, Defendant KCEB states that the VRA and Missouri election statutes speaks for themselves, including the ability of an election judge to assist more than one voter other than an immediate family member.

52. Paragraph 52 of Plaintiffs' Complaint states legal conclusions which do not require a response from Defendant KCEB. To the extent a response is required, Defendant KCEB states that the Missouri election statutes, including Mo. Rev. Stat. § 115.635.8, speak for themselves.

53. Paragraph 53 of Plaintiffs' Complaint states legal conclusions which do not require a response from Defendant KCEB. To the extent a response is required, Defendant KCEB states that the Missouri election statutes speak for themselves.

54. Paragraph 54 of Plaintiffs' Complaint states legal conclusions which do not require a response from Defendant KCEB. To the extent a response is required, Defendant KCEB states that the Missouri election statutes speak for themselves.

55. Defendant KCEB denies that voting assistance restrictions prevents organizing efforts to help voters who may need assistance and is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 55 of Plaintiffs' Complaint.

56. Defendant KCEB admits that it trains and instructs election judges to conduct election in accordance with Missouri election laws, including compliance with voter assistance, and denies the remaining allegations of Paragraph 56 of Plaintiffs' Complaint to the extent inconsistent with Missouri election laws.



### **Organizational Assistor Plaintiff Activities and Harms**

57. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 57 of Plaintiffs' Complaint.

58. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 58 of Plaintiffs' Complaint.

59. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 59 of Plaintiffs' Complaint.

60. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 60 of Plaintiffs' Complaint.

61. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 61 of Plaintiffs' Complaint.

62. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 62 of Plaintiffs' Complaint.

63. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 63 of Plaintiffs' Complaint.

64. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 64 of Plaintiffs' Complaint.

65. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 65 of Plaintiffs' Complaint.

66. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 66 of Plaintiffs' Complaint.

67. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 67 of Plaintiffs' Complaint.

68. Defendant KCEB admits that Plaintiff Mo P&A claims that it is a statewide not-for-profit organization and is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 68 of Plaintiffs' Complaint.

69. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 69 of Plaintiffs' Complaint.

70. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 70 of Plaintiffs' Complaint.

71. Defendant KCEB admits that Plaintiff VozKC claims that it is a volunteer organization located in Kansas City, Missouri, but states that it is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 71 of Plaintiffs' Complaint.

72. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 72 of Plaintiffs' Complaint.

73. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 73 of Plaintiffs' Complaint.

74. Defendant KCEB admits that Plaintiff VozKC claims that it is a volunteer-based organization, but states that it is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 74 of Plaintiffs' Complaint.

75. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 75 of Plaintiffs' Complaint.

76. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 76 of Plaintiffs' Complaint.

77. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 77 of Plaintiffs' Complaint.

78. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 78 of Plaintiffs' Complaint.

79. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 79 of Plaintiffs' Complaint.

80. Defendant KCEB is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 80 of Plaintiffs' Complaint.

81. Paragraph 81 of Plaintiffs' Complaint states legal conclusions which do not require a response from Defendant KCEB. To the extent a response is required, Defendant KCEB states that the Missouri election statutes speak for themselves.

82. Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 82 of Plaintiffs' Complaint.

83. Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 83 of Plaintiffs' Complaint.

84. Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 84 of Plaintiffs' Complaint.

85. Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 85 of Plaintiffs' Complaint.

86. Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 86 of Plaintiffs' Complaint.

87. Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 87 of Plaintiffs' Complaint.

88. Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 88 of Plaintiffs' Complaint.

89. Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 89 of Plaintiffs' Complaint.

#### **Individual Assistor Plaintiff Activities and Harms**

90. Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 90 of Plaintiffs' Complaint.

91. Paragraph 91 of Plaintiffs' Complaint states legal conclusions which do not require a response from Defendant KCEB. To the extent a response is required, Defendant KCEB states that the Missouri election statutes speak for themselves. Further, Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 91 of Plaintiffs' Complaint.

92. Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 92 of Plaintiffs' Complaint.

93. Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 93 of Plaintiffs' Complaint.

94. Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 94 of Plaintiffs' Complaint.

95. Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 95 of Plaintiffs' Complaint.

96. Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 96 of Plaintiffs' Complaint.

97. Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 97 of Plaintiffs' Complaint.

98. Paragraph 98 of Plaintiffs' Complaint states legal conclusions which do not require a response from Defendant KCEB. To the extent a response is required, Defendant KCEB states that the Missouri election statutes speak for themselves. Further, Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 98 of Plaintiffs' Complaint.

99. Paragraph 99 of Plaintiffs' Complaint states legal conclusions which do not require a response from Defendant KCEB. To the extent a response is required, Defendant KCEB states that the Missouri election statutes speak for themselves.

100. Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 100 of Plaintiffs' Complaint.

#### **Voter Plaintiff Harms**

101. Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 101 of Plaintiffs' Complaint.

102. Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 102 of Plaintiffs' Complaint.

103. Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 103 of Plaintiffs' Complaint.

104. Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 104 of Plaintiffs' Complaint.

105. Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 105 of Plaintiffs' Complaint.

106. Paragraph 106 of Plaintiffs' Complaint states legal conclusions which do not require a response from Defendant KCEB. To the extent a response is required, Defendant KCEB states that the Missouri election statutes speak for themselves. Further, Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 106 of Plaintiffs' Complaint.

107. Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 107 of Plaintiffs' Complaint.

108. Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 108 of Plaintiffs' Complaint.

### **COUNT I**

109. As its response to paragraph 109 of Plaintiffs' Complaint, Defendant KCEB incorporates in responses to the foregoing paragraphs of Plaintiffs' Complaint as fully set forth herein.

110. Paragraph 110 of Plaintiffs' Complaint states legal conclusions which do not require a response from Defendant KCEB. To the extent a response is required, Defendant KCEB states that the U.S. Constitution's Supremacy Clause speaks for itself.

111. Paragraph 111 of Plaintiffs' Complaint states legal conclusions which do not require a response from Defendant KCEB. To the extent a response is required, Defendant KCEB states that the VRA and Missouri election statutes speak for themselves.

112. Paragraph 112 of Plaintiffs' Complaint states legal conclusions which do not require a response from Defendant KCEB. To the extent a response is required, Defendant KCEB states that the VRA, the Supremacy Clause, and Missouri election statutes speak for themselves. Further, Defendant KCEB states is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 112 of Plaintiffs' Complaint.

## COUNT II

113. As its response to paragraph 113 of Plaintiffs' Complaint, Defendant KCEB incorporates in responses to the foregoing paragraphs of Plaintiffs' Complaint as fully set forth herein.

114. Paragraph 114 of Plaintiffs' Complaint states legal conclusions which do not require a response from Defendant KCEB. To the extent a response is required, Defendant KCEB states that the VRA speaks for itself.

115. Paragraph 115 of Plaintiffs' Complaint states legal conclusions which do not require a response from Defendant KCEB. To the extent a response is required, Defendant KCEB states that the VRA speaks for itself.

116. Paragraph 116 of Plaintiffs' Complaint states legal conclusions which do not require a response from Defendant KCEB. To the extent a response is required, Defendant KCEB states that the VRA and Missouri election statutes speak for themselves.

117. Paragraph 117 of Plaintiffs' Complaint states legal conclusions which do not require a response from Defendant KCEB. To the extent a response is required, Defendant KCEB states that the VRA speaks for itself.

**ANSWER TO ALL COUNTS**

Defendants specifically deny each and every allegation contained in Plaintiffs' Complaint not specifically admitted herein, including those contained in Plaintiffs' prayer for relief.

**AFFIRMATIVE DEFENSES**

1. Defendants currently have insufficient knowledge or information from which to form a belief as to whether or not they may have additional, as yet unstated, defenses available. Defendants reserve the right to assert additional defenses in the event discovery indicates it would be appropriate.

Respectfully submitted,

/s/ David B. Raymond

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Attorneys for Defendant Kansas City Board  
of Election Commissioners



**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 18, 2022, a true and correct copy of the foregoing was filed electronically with the above-captioned Court, with notice of case activity generated and sent electronically by the Clerk of the Court to those requesting notice.

\_\_\_\_\_/s/ David B. Raymond  
Attorney

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