IN THE SUPREME COURT OF THE STATE OF MONTANA
DA 22-0229

SISTER MARY JO MCDONALD, LORI MALONEY, FRITZ DAILY, BOB BROWN, DOROTHY BRADLEY, VERNON FINLEY, MAE NAN ELLINGSON; AND THE LEAGUE OF WOMEN VOTERS OF MONTANA,

Plaintiffs and Appellees,

V.

CHRISTI JACOBSEN, MONTANA SECRETARY OF STATE,

Defendant and Appellant.

On Appeal from the Montana Second Judicial District Court,
Butte-Silver Bow County, Cause No. DV-21-120
The Honorable Peter Ohman, Presiding

APPELLANT'S MOTION TO DISQUALIFY

AUSTIN KNUDSEN
Montana Attorney General
DAVID M.S. DEWHIRST
Solicitor General
CHRISTIAN B. CORRIGAN
Assistant Solicitor General
TIMOTHY LONGFIELD
Assistant Attorney General
P.O. Box 201401
Helena, MT 59620-1401
Phone: 406-444-2026
david.dewhirst@mt.gov
christian.corrigan@mt.gov
timothy.longfield@mt.gov

EMILY JONES
Special Assistant Attorney General
Jones Law Firm, PLLC
115 N. Broadway, Suite 410
Billings, MT 59101
Phone: (406) 384-7990
emily@joneslawmt.com

Attorneys for Defendant-Appellant

(Additional Counsel listed on next page)

JAMES H. GOETZ
Goetz, Baldwin & Geddes, P.C.
35 North Grand
PO Box 6580
Bozeman, MT 59771-6580

A. CLIFFORD EDWARDS
Edwards & Culver
1648 Poly Drive, Suite 206
Billings, MT 59102

Attorneys for Plaintiffs and Appellees

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INTRODUCTION

This case presents an important question: can the Legislature—the People's branch—submit a legislative referendum asking the qualified electors of Montana how supreme court justices ought to be elected in our state? But there's an equally important threshold question: should justices of this Court rule on a case that directly implicates the process through which they will apply to the people of Montana to serve as members of this Court?

Montana's constitutional system rests on the bedrock assumption of "an independent, fair, and impartial judiciary" which can only be preserved through "the appearance of judicial propriety and independence." *W. Tradition P'ship, Inc. v. Att'y Gen. of Mont.*, 2011 MT 328, ¶40, 363 Mont. 220, 271 P.3d 1. Montana law, therefore, requires judges and justices to disqualify themselves when they have an interest in the outcome of a case. MCA § 3-1-803. Each justice of this Court holds a clear, direct, and personal interest in the outcome of this case.

This case involves a constitutional challenge to HB 325. *See* HB 325, 67th Leg (2021). HB 325—if approved by the voters—would change how supreme court justices are elected in Montana. Instead of the

current system of statewide elections, HB 325 would divide the state into seven supreme court districts, assign each supreme court seat to one of the seven districts, and require candidates for supreme court seats to run within the district assigned to that seat. HB 325 could make it more difficult for some supreme court justices to obtain re-election. It could make it easier for other justices. What cannot be questioned, however, is that the outcome of this case will *affect* how and where justices run for re-election. Also, HB 325—if approved—will make it easier for upstart candidates to challenge incumbents, while the current statewide system overwhelmingly favors incumbents. And—like anyone—the justices of this Court have a significant personal interest in how and where they must campaign to keep their jobs. That should end the analysis.

The law indulges "a presumption of honesty and integrity in those serving as adjudicators." *Withrow v. Larkin*, 421 U.S. 35, 47 (1975). But the law recognizes what experience already teaches: judges don't shed their human nature at the courthouse door. *See, e.g.*, *Caperton v. A. T. Massey Coal Co.,* 556 U.S. 868, 883–84 (2009) (recognizing that judges are subject to "psychological tendencies and human weakness[es]" that can create "a risk of actual bias"). It is only natural that justices of this

Court should have a substantial interest in how and where they seek re-election. And there's no question that HB 325, if approved, could affect that interest. Montana law requires disqualification.

Finally, *Reichert*'s merits and justiciability analyses loom in the background of this appeal. *See Reichert v. State*, 2012 MT 111, ¶¶ 53–90, 365 Mont. 92, 278 P.3d 455. But *Reichert*'s *disqualification* analysis is mere dicta with no precedential value. *See Id.* ¶¶ 22–52. It was addressed only to four justices—two others had already recused from the case and a third was set to retire—and arose in a unique procedural posture—only amici raised the issue of disqualification. *Id.* ¶¶ 24–25. And judges always have a *sua sponte* duty to consider whether they should disqualify from a case. *See Draggin' Y Cattle Co. v. Addink*, 2016 MT 98, ¶ 25, 383 Mont. 243, 371 P.3d 970 (Draggin' Y II); M. C. Jud. Cond., Rule 2.12(A) ("A judge *shall* disqualify himself or herself in any proceeding in which the judge's impartiality might reasonably be questioned."); *id.*, Rule 2.12 cmt. [2] ("A judge's obligation not to hear or decide matters in which disqualification is required applies regardless of whether a motion to disqualify is filed."). Nothing about what four justices decided in

Reichert—on an issue raised only by amici—requires the same result here.

But if this Court disagrees and reads *Reichert* as binding precedent that forbids disqualification in this case, this Court should overrule that portion of *Reichert*. Stare decisis is not an inexorable command: "Where vital and important public or private rights are concerned … it becomes the duty, as well as the right of the court to … allow no previous error to continue if it can be corrected." *Mont. Horse Prods. Co. v. Great N. Ry.*, 91 Mont. 194, 216, 7 P.2d 919, 927 (1932). The four justices' rationale for not recusing in *Reichert* was poorly reasoned then and looks even worse now. More importantly, it undermines confidence in Montana's highest court—surely a "vital and important public … right[.]" *Id.* The State and Secretary of State, by and through the Attorney General, wish to bolster confidence in the Montana judiciary and the Rule of Law. Hence this motion.

In normal times, this would be a paradigmatic case for recusal. These, however, are not normal times. *See, e.g.*, *McLaughlin v. Mont. State Legislature*, 2021 MT 120, 404 Mont. 166, 489 P.3d 482; *see also* Petition for Writ of Certiorari, *Mont. State Legis. v. McLaughlin*, 142 S.

Ct. 1362 (No. 21-859), App'x at 638–51. ("*McLaughlin* cert. petition"). Now is the time to return to normalcy. The State respectfully submits that all seven justices of this Court—none of whom have announced an intent to retire—must recuse from this case. District court judges—chosen at random from those not otherwise disqualified[1]—can adjudicate this case without those disqualifying interests.

ARGUMENT

I. The circumstances of this appeal call for disqualification.

HB 325 affects the justices of this Court in two unique ways. If HB 325 passes in November, it would alter the method and location of campaigning for justices who want to seek re-election. It would also reduce the inherent advantage incumbents hold in Montana supreme court elections. Because the outcome of this clearly and uniquely affects the current justices' interests in re-election, the justices must recuse.

Montana law requires justices of this Court to disqualify themselves "in any action or proceeding … in which [they are] interested." MCA § 3-1-803. This requirement has deep roots in the Anglo-American

[1] The pool should not, for instance, include district judges currently running for seats on the Montana Supreme Court. Nor should it include those district judges who participated in a court-administered poll or opined on HB 325 during the 2021 legislative session.

legal tradition. *See Williams v. Pennsylvania*, 579 U.S. 1, 29 (2016) (Thomas, J., dissenting). From the early days of the common law, our legal system has recognized that a "judge could not decide a case in which he had a direct and personal financial stake." *Id.* (citing *Dr. Bonham's Case*, 8 Co. Rep. 107a, 114a, 118a, 77 Eng. Rep. 638, 647, 652 (C.P. 1610).

In keeping with this tradition, the Montana Code of Judicial Conduct demands that judges always act in a way that promotes "public confidence in the independence, integrity, and impartiality of the judiciary." M. C. Jud. Cond., Rule 1.2. Accordingly, the Code requires "judges to disqualify themselves if a party might reasonably question their impartiality." *Draggin' Y II*, ¶ 25. This includes when a "judge knows that the judge … has more than a de minimis interest that could be substantially affected by the proceeding." M. C. Jud. Cond., Rule 2.12(A)(2)(c).[2] This "affirmative duty" to disqualify "applies regardless of whether a motion to disqualify is filed." *Draggin' Y II,* ¶ 25 (quoting M. C. Jud. Cond., Rule 2.12 cmt. [2]).

[2] *See* M. C. Jud. Cond., Terminology, "De minimis" ("'De minimis,' in the context of interests pertaining to disqualification of a judge, means an insignificant interest that could not raise a reasonable question regarding the judge's impartiality.").

Taken together, these legal principles present two questions: (1) do the justices of this Court have an interest in how and where they must run for re-election? (2) If so, could the outcome of this appeal affect that interest? The answer to both questions is yes. The conclusion that follows: the justices must recuse themselves from this appeal.[3]

Without question, the justices of this Court have a significant interest in their seats on Montana's highest court. That position brings with it prestige, privilege, and one of the State's highest government salaries. The justices also hold one of the few positions in Montana's government without term limits.

The next question is whether the outcome of this proceeding—in which the justices are asked to keep HB 325 from the ballot before the voters of Montana even have a chance to consider the bill—*could* affect the current justices' interest in re-election. *See* MCA § 3-1-803; M. C. Jud. Cond., Rule 2.12(A)(2)(c). For several reasons, the answer is yes—and in a manner *unique* to the current justices.

[3] If any justice *knows* that he or she will not run for re-election during or after 2024, he or she should say so and thus eliminate the basis for disqualification.

First, HB 325 would change how and where justices must campaign for re-election. If the referendum passes, justices who want to run for re-election would have to focus their campaigns on the district assigned to their seat. This would require travel. It would also cost time and money. Of course, the logistical burden for some justices could increase. For others it could decrease. Either way, HB 325 would meaningfully change the cost, difficulty, location, and method of campaigning for every justice who wishes to run for re-election in the future. And Rule 2.12(A)(2)(c) requires disqualification whenever the judge knows the outcome of the proceeding could substantially *affect* his non-de minimis interest—the effect doesn't have to be negative. *See* M. C. Jud. Cond., Rule 2.12(A)(2)(c).

Second, the current statewide election process for supreme court justices overwhelmingly favors incumbent justices. Unremarkably, incumbents have the upper hand in elections. *See, e.g.*, Tom Ginsburg, James Melton, Zachary Elkins, *On the Evasion of Executive Term Limits*, 52 Wm. & Mary L. Rev. 1807, 1820–21 (2011) (discussing the many direct and indirect advantages incumbent candidates have over their electoral challengers); Andrew Gelman & Gary King, *Estimating Incumbency Advantage Without Bias*, 34 Am. J. Pol. Sci. 1142, 1158 fig. 2 (1990) (average

incumbent advantage in U.S. Congressional races between 1975 and 1990 was 10%). Montana supreme court elections are no different. Since 2002, 17 supreme court elections have featured an incumbent candidate. In those races, the incumbent has won 17 times. HB 325 could reduce incumbents' inherent electoral advantages. Replacing the current system with district-based elections could, for instance, make it easier for upstart candidates with strong local ties to defeat incumbent justices with greater statewide name recognition and institutional backing.

There's also the matter of the Montana Judges Association (MJA) polls. Chief Justice McGrath directed the Supreme Court Administrator to send a poll to every judge in Montana asking whether they supported or opposed HB 325. *See McLaughlin* cert. petition, App'x at 547 (quoting Justice Baker's April 19, 2021, testimony before the Special Joint Select Committee on Judicial Accountability and Transparency). In April 2021, Chief Justice McGrath informed the Legislature that, based on the results of that poll, the MJA opposed HB 325. *Id.* at 631. These facts

independently require Chief Justice McGrath to recuse himself, even if he did not participate in the poll.[4]

At bottom, a disinterested observer would conclude that the sitting justices of this Court have a substantial interest in how and where they run for re-election. Because HB 325 could substantially affect this interest, all justices who are considering running for re-election must disqualify themselves from this appeal.

II. *Reichert* doesn't preclude disqualification in this case.

Reichert involved a constitutional challenge to LR-119, a legislative referendum that would have provided for supreme court districts by election. *See Reichert*, ¶¶ 1–7. By the time the opinion issued, two justices had already recused themselves and another justice explained that he planned to retire at the end of the term. *Id.* ¶ 24. Seven amici legislators argued that the four remaining justices who did not plan to retire should disqualify themselves because LR-119 directly affected their "ability to get reelected." *Reichert*, ¶ 43. The Court found this argument

[4] District court judges who participated in the MJA poll regarding HB 325 would also be disqualified from this appeal. Presumptively, the justices did not participate in this polling. It goes without saying that any justice who did participate would be disqualified from this case.

"implausib[le]." *Id.* ¶ 44. It reasoned that "district court judges have 'the potential' to run for a seat in this Court in the future, 'could possibly' be prevented by LR-119 from getting elected and thus (under Legislators' theory) have an 'interest' in the outcome of this case." *Id.* So the Court asserted—without much explanation—that all judges in Montana held an equally disqualifying interest in the outcome of the case, blithely invoked the rule of necessity, and concluded that "none of the justices would be disqualified." *Id.* ¶ 44.

The Court also believed that LR-119's potential influence on the four non-retiring justices' interests was "too remote, too speculative, and too contingent to mandate recusal under Rule 2.12 or [MCA § 3-1-803]." *Id.* ¶ 45. The Court observed, "*if* the justices divine correctly which vote (to uphold LR-119 or to strike it down) will give them the best chances for reelection, *if* the voters pass LR-119 …[,] *if* the justices decide to seek reelection, and *if* the justices draw opponents in their respective elections, then they might conceivably benefit from having sat on this case. Such a theoretical interest does not require disqualification." *Id.* ¶ 48.

Reichert's disqualification analysis doesn't bind this Court and isn't persuasive. Only amici raised the issue of disqualification and only four

justices decided that disqualification wasn't necessary, while two justices reached the opposite conclusion. *Id.* ¶¶ 24–25. And, in any event, judges always have a *sua sponte* duty in each new case to determine if they must disqualify themselves under Montana law. *See Draggin' Y II*, ¶ 25. Finally, *Reichert's* explanation for why the four non-retiring justices didn't have to recuse themselves contradicts the Court's subsequent justiciability analysis. This Court must read *Reichert*'s disqualification analysis as nonbinding dicta.

If, however, this Court concludes that *Reichert*'s disqualification analysis is binding precedent and forbids disqualification in this case, the State submits that *Reichert* should be overruled on the issue of disqualification.

A. *Reichert*'s disqualification analysis is non-binding dicta.

For several reasons, *Reichert*'s disqualification holding isn't binding precedent. First, the parties to the appeal did not raise the issue of disqualification. Only amici did. *Id.* ¶ 25. And the Court thought it was "important to acknowledge" this fact. *Id.* Second, only four justices addressed the issue of disqualification. *Reichert*, ¶ 24. By the time the Court issued its opinion in *Reichert*, two of the sitting justices had already

recused, one planned to retire at the end of the term, and amici's disqualification arguments were directed to the four non-retiring justices who hadn't already recused. *Id.* ¶ 24. This Court has adopted this understanding of *Reichert*'s disqualification analysis, describing it as addressing "whether Rule 2.12 required *four justices* to recuse themselves from deciding an issue involving the election of Supreme Court justices." *Draggin' Y Cattle Co. v. Junkermier*, 2017 MT 125, ¶ 16, 387 Mont. 430, 395 P.3d 497 (Draggin' Y III) (emphasis added) (citing *Reichert*, ¶ 42).

Third, the rationale the four non-retiring justices used to explain why disqualification was—in their view—unnecessary contradicts *Reichert*'s justiciability analysis. As noted, the four non-retiring justices thought that the disqualifying interests presented by LR-119 were "too remote, too speculative, and too contingent to mandate recusal under Rule 2.12 or [MCA § 3-1-803]." *Reichert*, ¶ 45. The Court observed, "*if* the justices divine correctly which vote (to uphold LR-119 or to strike it down) will give them the best chances for reelection, *if* the voters pass LR-119[,] *if* the justices decide to seek reelection, and *if* the justices draw opponents in their respective elections, then they might conceivably benefit from having sat on this case. Such a theoretical interest does not

require disqualification." *Id.* ¶ 48 (emphasis in original). Yet the Court strangely concluded that the same attenuated chain of events was "definite and concrete," and "not hypothetical or abstract" for purposes of constitutional standing.[5] *See id.* ¶¶ 52–60; *see also id.* ¶¶ 91–100 (Baker, J., dissenting) (criticizing *Reichert* majority for eschewing normal principles of constitutional standing applied in pre-election challenges to legislative referenda). Here we have yet another reason why *Reichert*'s disqualification section must be dicta: this Court declines to afford precedential weight to language in an opinion that contradicts the central holding of the case. *See, e.g.*, *Bohrer v. Clark*, 180 Mont. 233, 240, 590 P.2d 117, 121 (1978).

Finally, regardless of what the four non-retiring *Reichert* justices concluded about their own duty to disqualify, judges always have an affirmative, *sua sponte*, duty to disqualify themselves when "a party might reasonably question their impartiality." *Draggin' Y II*, ¶ 25; M. C. Jud. Cond., Rule 2.12 cmt. [2] ("A judge's obligation not to hear or decide matters in which disqualification is required applies regardless of whether a

[5] This further supports the State's contention that *Reichert*'s discussion of and conclusion about disqualification is nonbinding dicta.

motion to disqualify is filed."). *Reichert*'s disqualification analysis is non-binding dicta. This Court can—and should—ignore it.

B. If this Court reads *Reichert*'s disqualification analysis as binding precedent, it was poorly reasoned and should be overruled.

If this Court disagrees, however, and concludes that *Reichert*'s disqualification analysis is binding precedent, the State submits that portion of *Reichert* should be overruled. This Court's "decisions are not sacrosanct and stare decisis should not be used as a mechanical formula of adherence to the latest decision." *State v. Wolf*, 2020 MT 24, ¶ 21, 398 Mont. 403, 457 P.3d 218 (quotations omitted). "The … rule of stare decisis was promulgated on the ground of public policy, and it would be an egregious mistake to allow more harm than good from it," especially where "vital and important public and private rights are concerned." *Mont. Horse Prods.*, 91 Mont. at 216, 7 P.2d at 927.

Perhaps no issue is so "vital and important" as the public's confidence in the judiciary. Indeed, Montana's constitutional system rests on the bedrock assumption of "an independent, fair, and impartial judiciary." *W. Tradition P'ship*, ¶ 40. *Reichert's* disqualification analysis undermines that fundamental assumption. It suggests—in the face of

common-sense expectations and ordinary experience—that the members of this Court have no interest in the fate of a bill that could substantially change how and where they seek re-election. It is wrong.

Reichert's analysis is flawed in several other ways, too. *Reichert* explained that the disqualifying interest in winning election to a supreme court seat "is not exclusive to" sitting justices. *Reichert*, ¶ 37. Thus, *Reichert* reasoned, even if a supreme court justice had a disqualifying interest in re-election and disqualified herself, the district judge who would replace her, *see* MONT. CONST. art. VII, § 3(2), would also have a disqualifying interest in the case. *Id.* But this analysis entirely overlooked the fact that even though district court judges can run for a supreme court seat, *see* MONT. CONST., art. VII § 9(1), they have a far more remote interest in the method of election for supreme court justices than the sitting justices do. Since 2002, an incumbent has run for a supreme court seat 17 times and won 17 times. Ten years after *Reichert*, it seems uncontestable that sitting justices have a far more direct interest in how and where supreme court elections are conducted than any other judge in Montana. Also, nothing prevented the non-retiring *Reichert* justices from finding replacement district court judges who knew they weren't

planning on running for a supreme court seat in the future.[6] *See* M. C. Jud. Cond., Rule 2.12(A)(2)(c). In a case implicating the justices' job security, surely this would have been a wiser course than simply invoking the rule of necessity and declaring all judges equally biased. *Cf. Reichert*, ¶¶ 37, 44 (invoking the rule of necessity).

Second, while accusing the amici of misapplying M. C. Jud. Cond., Rule 2.12(A)(2)(c), the *Reichert* majority misapplied—and misapprehended—that rule. *See Reichert*, ¶¶ 45, 50–51. Rule 2.12(A)(2)(c), does not, as *Reichert* suggested, require a judge to know with *certainty* that the proceeding will substantially affect a judge's non-de minimis interest. *Cf. Reichert*, ¶¶ 45, 48. The rule requires disqualification when a judge knows he has an interest that "*could be* substantially affected by the proceeding." M. C. Jud. Cond., Rule 2.12(A)(2)(c) (emphasis added). The rule, in other words, contemplates that the "substantial" effect to the judge's interest need not be certain to be disqualifying. *Id.* The *potential* that the outcome of the case will substantially affect a judge's interest is enough. *Id.*

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[6] Indeed, that's exactly what the justices should do in this case. This could be accomplished, for example, by assigning retired district judges to the case.

Third, *Reichert* wrongly implied that *positive* judicial bias in favor of a law is somehow acceptable. *See Reichert*, ¶ 38, n.6. The law on disqualification doesn't require that the proceeding *negatively* affect a justice's non-de minimis interest. *See* MCA § 3-1-803; M. C. Jud. Cond., Rule 2.12(A)(2)(c). Clearly, a judge still must disqualify himself if the outcome of a case could substantially *benefit* him. *Id.*

Reichert got one thing right: "the ultimate question here is whether the … justices' impartiality 'might reasonably be questioned'" in a case that could significantly change how they run for re-election. *Reichert*, ¶ 50. But *Reichert* reached the wrong answer to that question. Of course justices have an substantial interest in how and where they must run for re-election. And history and common sense suggest that this interest is far more direct for the current justices of this Court than for any other judge in Montana. *Cf. Reichert*, ¶¶ 37, 44. A case asking the current supreme court justices whether the voters should get the chance to change how and where those justices run for re-election raises a clear inference of bias. This case cries out for recusal.

CONCLUSION

Certainly, there's "a presumption of honesty and integrity in those serving as adjudicators." *Withrow*, 421 U.S. at 47. But the Code of Judicial Conduct exists because judges remain human even after they don their robes. *See, e.g.*, *McLaughlin,* 2020 MT 120. Any disinterested observer would conclude that justices of this Court have a substantial interest in the method by which they apply for and secure their current—and putatively future—jobs from the People of Montana. "[T]here are times when disqualification is necessary to protect the rights of litigants and preserve public confidence in the independence, integrity, and impartiality of the judiciary." *Reichert*, ¶ 49 (quoting M. C. Jud. Cond., Rule 2.7 cmt. [1].) This is one of those times.

DATED this 5th day of May, 2022.

AUSTIN KNUDSEN
Montana Attorney General

/s/ David M.S. Dewhirst
DAVID M.S. DEWHIRST
Solicitor General

CHRISTIAN B. CORRIGAN
Assistant Solicitor General
TIMOTHY LONGFIELD
Assistant Attorney General
P.O. Box 201401
Helena, MT 59620-1401
Phone: 406-444-2026
david.dewhirst@mt.gov
christian.corrigan@mt.gov
timothy.longfield@mt.gov

Attorney for Defendant and Appellant

CERTIFICATE OF COMPLIANCE

Pursuant to Rule 11 of the Montana Rules of Appellate Procedure, I certify that this principal brief is printed with a proportionately spaced Century Schoolbook text typeface of 14 points; is double-spaced except for footnotes and for quoted and indented material; and the word count calculated by Microsoft Word for Windows is 3,807 words, excluding certificate of service and certificate of compliance.

/s/ David M.S. Dewhirst
DAVID M.S. DEWHIRST

CERTIFICATE OF SERVICE

I, David M.S. Dewhirst, hereby certify that I have served true and accurate copies of the foregoing Motion - Other to the following on 05-05-2022:

James H. Goetz (Attorney)
PO Box 6580
Bozeman MT 59771-6580
Representing: Dorothy Bradley, Bob Brown, Fritz Daily, Mae Nan Ellingson, Vernon Finley, Lori Maloney, Sister Mary Jo McDonald, League of Women Voters of Montana
Service Method: eService

A. Clifford Edwards (Attorney)
1648 Poly Drive
Bilings MT 59102
Representing: Dorothy Bradley, Bob Brown, Fritz Daily, Mae Nan Ellingson, Vernon Finley, Lori Maloney, Sister Mary Jo McDonald, League of Women Voters of Montana
Service Method: eService

Timothy Longfield (Govt Attorney)
215 N. Sanders Street
Helena MT 59601
Representing: Secretary of State, Office of the
Service Method: eService

Emily Jones (Attorney)
115 North Broadway
Suite 410
Billings MT 59101
Representing: Secretary of State, Office of the
Service Method: eService

Christian Brian Corrigan (Govt Attorney)
215 North Sanders
Helena MT 59601
Representing: Secretary of State, Office of the
Service Method: eService

Electronically signed by Buffy Ekola on behalf of David M.S. Dewhirst
Dated: 05-05-2022