COMMONWEALTH OF MASSACHUSETTS
SUPREME JUDICIAL COURT FOR SUFFOLK COUNTY

DAVID C. BAXTER, MARY BAINE CAMPBELL, CATHERINE BRUN-COTTAN, GEORGES BRUN-COTTAN, LEIGH CHINITZ, BETTINA NEUEFEIND, and LEO T. SPRECHER, Plaintiffs, v. ATTORNEY GENERAL AND SECRETARY OF STATE OF THE COMMONWEALTH OF MASSACHUSETTS, Defendants.	)	Civil Action No. SJ-2022-

COMPLAINT FOR DECLARATORY RELIEF

NATURE OF THE ACTION

1. This action for declaratory relief arises from the Attorney General's refusal to certify initiative petition 22-01 entitled "Initiative Petition for a Law Relative to Limiting Political Contributions to Independent Expenditure PACs" (the "Petition" or "Proposed Law") under Article 48 of the Massachusetts Constitution.

2. The Attorney General refused to certify Plaintiffs' Petition on the grounds that "the proposed law would violate the free speech rights afforded by the state constitution."

3. The Attorney General's determination is wrong. There is no controlling legal precedent, in either state or federal law, holding that the regulation of contributions to independent expenditure political action committees violates either the First Amendment of the federal constitution or Article 16 of the Massachusetts Declaration of Rights.

4. Plaintiffs therefore seek a declaratory judgment that the Attorney General erred in refusing to certify the Petition as consistent with Article 48.

5. The Attorney General has further indicated that Plaintiffs must submit signatures by December 2022 for a Petition that the Attorney General has ruled "inconsistent" with Article 48 and that Plaintiffs intend to submit to the General Court in 2024. If Plaintiffs do not submit those signatures by December 2022, the Attorney General argues, the Petition would be moot.

6. The Attorney General is again wrong. Article 48, Part II, section 3 of the Massachusetts Constitution[1] does not require that Plaintiffs submit signatures until the first Wednesday of December 2023. The Attorney General's position to

[1] All references in this complaint to Article 48, part II, section 3 refer to that section as amended by Article 74.

the contrary is both inconsistent with the clear language and purpose of Article 48, and contrary to the balance of equities for any petition submitted more than two years before it would appear on the ballot.

7. Plaintiffs therefore further seek a declaratory judgment that they are not required to deliver to the Secretary of the Commonwealth the "remainder of the signatures," as that phrase is used in Article 48, Part II, section 3, until the first Wednesday of December 2023.

PARTIES

8. Plaintiff, David C. Baxter, is a registered voter in Acton, Massachusetts, who signed the Petition submitted to the Attorney General for certification.

9. Plaintiff, Mary Baine Campbell, is a registered voter in Cambridge, Massachusetts, who signed the Petition submitted to the Attorney General for certification.

10. Plaintiff, Catherine Brun-Cottan, is a registered voter in Belmont, Massachusetts, who signed the Petition submitted to the Attorney General for certification.

11. Plaintiff, Georges Brun-Cottan, is a registered voter in Belmont, Massachusetts, who signed the Petition submitted to the Attorney General for certification.

12. Plaintiff, Leigh Chinitz, is a registered voter in Wellesley, Massachusetts, who signed the Petition submitted to the Attorney General for certification.

13. Plaintiff, Bettina Neuefeind, is a registered voter in Brookline, Massachusetts, who signed the Petition submitted to the Attorney General for certification.

14. Plaintiff, Leo T. Sprecher, is a registered voter in Newton, Massachusetts, who signed the Petition submitted to the Attorney General for certification.

15. The Attorney General, who is sued only in her official capacity, has certain official duties under Article 48 of the Massachusetts Constitution.

16. The Secretary of State (the "Secretary"), who is sued only in his official capacity, has certain official duties under Article 48 of the Massachusetts Constitution.

JURISDICTION AND VENUE

17. This Court has subject matter jurisdiction over this matter under:

A. G.L. c. 214, § 1 because this Court has original jurisdiction in all matters of equity cognizable under the general principles of equity jurisprudence; and

B. G.L. c. 231A, § 1 because it satisfies the requirements for a declaratory judgment action in that there are actual controversies between the Plaintiffs and the Attorney General as to whether (i) the Attorney General erred in refusing to certify the Petition as compliant with Article 48 and (ii) the Plaintiffs are to deliver the "remainder of the required signatures" required by Article 48, Part II, section 3, on or before the first Wednesday of December 2022 or December 2023.

18. This Court has statewide jurisdiction, and therefore has personal jurisdiction over the Attorney General and the Secretary.

19. As this Court has jurisdiction throughout the Commonwealth, venue as to the Plaintiffs is proper in this Court. G.L. c. 214, § 1, G.L. c. 231A, § 1, et seq.

STATEMENT OF FACTS

The Attorney General Erred in
Refusing to Certify the Petition.

20. In June 2022, Plaintiffs filed Initiative 22-01 with the Attorney General in accordance with Article 48 of the Massachusetts Constitution. A true and accurate copy of the Petition is attached as Exhibit A.

21. The Petition proposes to limit the amount individuals may contribute to political committees that make independent expenditures to advocate for or against particular candidates without cooperation or consultation with those

candidates. Those committees are referred to here as Independent Expenditure PACs ("IEPs"). The per annum limit for individual contributions to such committees would be $5,000.

22. Article 48, The Initiative, Part II, section 2, of the Massachusetts Constitution ("Excluded Matters") provides, in relevant part, "[n]o proposition inconsistent with any one of the following rights of the individual, as at present declared in the declaration of rights, shall be the subject of an initiative: . . . freedom of speech . . . ."

23. It is the rule of this Court that the Attorney General should not refuse to certify a petition unless "it is reasonably clear that a proposal contains an excluded matter." *Associated Industries of Massachusetts v. Attorney General*, 418 Mass. 279, 291 (1994). As this Court has determined, it is not "reasonably clear" when "facts might show that what appeared on the limited factual record to be at least constitutionally questionable was in fact a permissible subject of a referendum." *Id.* at 286. Where such "possibilities exist," this Court has reflected, "[the Court's] role is not to prevent the people from voting on the proposal." *Id.* (citing *Yankee Atomic Elec. Co. v. Sec'y of the Commonwealth*, 402 Mass. 750, 760 n.9 (1988)).

24. Despite this Court's instruction, on September 7, 2022, the Attorney General determined that the Petition would violate Article 16's freedom of speech

clause and refused to certify it as compliant with Article 48. The Attorney General's letter to Plaintiffs denying certification is attached as Exhibit B.

25. The Attorney General based her determination upon the observation that "[c]ourts across the country have uniformly held that limits on contributions to independent expenditure PACs — like those at issue in this proposed law — violate free speech protections." Ex. B. She concluded that the Supreme Judicial Court would reach the same conclusion construing Article 16's free speech clause. *Id*.

26. None of the courts referenced by the Attorney General have any jurisdiction over Massachusetts or Massachusetts law.

27. No Massachusetts court has ever addressed whether regulation of contributions to IEPs "violate art. 16's free speech protections."

A. As this Court has instructed, petitions are to be evaluated under Massachusetts law.

B. As the Attorney General acknowledged, "Massachusetts courts have not specifically weighed in on the constitutionality of laws limiting campaign contributions" to IEPs. *Id.*

C. More specifically, no Massachusetts court has articulated any test under Article 16 for evaluating limitations on contributions to IEPs. This Court has identified a standard for evaluating limits on political speech. *Associated*

Industries, 418 Mass. at 289 n.8. But as it has instructed, "[t]he identity of the standard does not, however, mean that this court's conclusions on applying the compelling State interest standard will invariably be the same as those of the Supreme Court of the United States." *Id.*

28. Under Massachusetts law, Plaintiffs could establish facts that would adequately justify limits on contributions to IEPs.

A. Plaintiffs could establish that the rise of IEPs has created an improper and corrupting dependence of representatives and constitutional officers of the executive upon large donors to IEPs.

B. This improper dependence corrupts the representative process.

C. Avoiding such dependence corruption is a compelling interest in any representative democracy.

D. Initiative 22-01 would advance that compelling interest without interfering with the freedom of anyone to speak on any political matter.

29. Federal law does not compel this Court to recognize any free-speech-related prohibition on limiting contributions to IEPs.

A. Lower federal courts have extended Supreme Court precedent to bar regulation of contributions to IEPs. *See, e.g.*, *SpeechNow v. F.E.C.*, 599 F.3d 686, 694 (D.C. Cir. 2010) (en banc) (extending *Citizens United v. F.E.C.*, 558 U.S.

310 (2010), *cert. denied sub nom. Keating v. FEC*, 562 U.S. 1003 (2010), extending *Citizens United v. F.E.C.*, 558 U.S. 310 (2010).

B. Because the certification process requires only a determination of whether the petition would clearly violate "free speech" under the Massachusetts Constitution, this Court is not bound by these lower court precedents, all of which are outside the First Circuit and none of which construe Massachusetts law.

C. To the extent the Court relies on the First Amendment of the United States Constitution in making that determination, this Court is bound by decisions of the United States Supreme Court construing the First Amendment. That Court, however, has never addressed the question whether regulations of contributions to IEPs "violate free speech protections." Letter from Office of Attorney General, Ex. B.

D. Were the United States Supreme Court to consider the question, Plaintiffs submit that that Court would likely permit the regulation of contributions to IEPs under the First Amendment.

(1) A clear majority of the Supreme Court now identifies itself as committed to the principle of "originalism" in interpreting the United States Constitution. *See Dobbs v. Jackson Women's Health Organization,* 142 S. Ct. 2228

(2022); *New York State Rifle & Pistol Association, Inc. v. Bruen*, 142 S. Ct. 2111 (2022).

(2) Applying the method of originalism that Justice Thomas proposes for the First Amendment, the First Amendment would clearly not bar the regulation of contributions to IEPs. *See, e.g., Biden v. Knight First Amend. Inst. at Columbia Univ.*, 141 S. Ct. 1220, 1223–24 (2021) (Thomas, J., concurring) ("regulations that might affect speech are valid if they would have been permissible at the time of the founding."). That test would plainly allow the regulation of contributions to IEPs. *See, e.g.,* Jud Campbell, *Natural Rights and the First Amendment*, 127 YALE L.J. 246, 259 (2017).

(3) Even applying a less robust version of originalism, the First Amendment would not bar the regulation of contributions to IEPs.

(1) Current Supreme Court doctrine permits the regulation of political speech if and only if the regulation advances a compelling state interest.

(2) The current Court has recognized the interest in avoiding "corruption" as a compelling state interest.

(3) As there are many different conceptions of "corruption," *see McCutcheon v. FEC,* 572 U.S. 185, 235–45 (2014) (Breyer, J., dissenting); *see also* Deborah Hellman, *Defining Corruption and Constitutionalizing Democracy*, 111 MICH. L. REV. 1385 (2013), *available at* https://perma.cc/UJ3A- X8TQ, an originalist would select that conception most clearly embraced by the Framers of either the First or Fourteenth Amendment.

(4) Plaintiffs submit the Framers were animated to avoid *both* quid pro quo *and* dependence corruption. *See* Testimony of Professor Jack Rakove, Ex. C.

(5) While the regulation of contributions to IEPs would not constitute a regulation to avoid quid pro quo corruption, it plainly would constitute regulation to avoid dependence corruption.

(6) Though the Supreme Court has not yet embraced a conception of "corruption" beyond quid pro quo corruption, the Court has never been presented with an

argument grounded in originalism about the scope of campaign finance regulations. Originalists have therefore not had the opportunity to consider and apply their principles to the Free Speech Clause of the First Amendment as it might affect campaign finance regulation.

(7) Were at least two of the current 6-justice conservative majority to accept these arguments of originalism, there would likely be a compound majority of the Supreme Court to uphold the regulation of contributions to IEPs.

(8) Plaintiffs therefore submit that these facts about originalism constitute "facts" that "show that what appear[s] on the limited factual record to be at least constitutionally questionable [is] in fact a permissible subject of a referendum." *Associated Industries*, 418 Mass. at 286.

30. Therefore, because (1) there is no state authority to the contrary, (2) there is no binding federal precedent to the contrary, (3) were the question presented to the United States Supreme Court, it would likely conclude, consistent with its dominant methodology for interpreting the Constitution, that limiting the

contributions to IEPs is permitted under the First Amendment, and (4) Plaintiffs could establish a compelling interest for limiting contributions to IEPs under state law, it is not "reasonably clear" under the standard articulated by this Court in *Associated Industries*, that the proposed limits violate "free speech, and therefore the Attorney General erred in refusing to certify Initiative 22-01.

The Plain Language of Article 48 Does Not Require the Plaintiffs to Deliver the "Remaining Required Signatures" Referred to in Part II, section 3, Until the First Wednesday in December 2023.

31. As with a minority of the initiative processes in constitutions across the nation, the Massachusetts constitution specifies a preclearance process before signatures can be gathered for a proposed petition.

32. This preclearance procedure serves two important functions. First, it lowers the burden of the petition process by assuring proponents that their petition is qualified before they undertake the cost of gathering signatures. Second, it assures that petitions that are not appropriate are not circulated to the public with the imprimatur of the Commonwealth.

33. In establishing this preclearance procedure, Article 48 specifies the timing for both (1) when an initiative must be presented to the Attorney General, and then after an initiative is certified, (2) when it may be filed with the Secretary of State.

A. The first sentence of Article 48, Part II, section 3, ("Mode of Origination") addresses the timing relevant to the Attorney General, and provides that:

> [The] petition shall first be signed by ten qualified voters of the commonwealth and shall be submitted to the attorney-general **not later than the first Wednesday of the August before the assembling of the General Court** into which it is to be introduced, and if he shall certify […] it may then be filed with the secretary of the commonwealth. (Emphasis added).

B. The last sentence of Article 48, Part II, "Mode of Origination," section 3, addresses the timing relevant to the Secretary of State, and provides that:

> All initiative petitions, with the first ten signatures attached, shall be filed with the secretary of the commonwealth **not earlier than the first Wednesday of the September before the assembling of the General Court** into which they are to be introduced, and the remainder of the required signatures shall be filed not later than the first Wednesday of the following December. (Emphasis added).

34. Proponents of Initiative 22-01 filed a Petition with the Attorney General before the first Wednesday in August 2022 which, if certified, they intend to be introduced into the General Court in 2024. This procedure is consistent with the plain text of Article 48.

A. The first sentence of section 3 requires that proponents submit their initiative to the "attorney-general not later than the first Wednesday of the

August before the assembling of the General Court into which it is to be introduced."

B. "[T]he first Wednesday of the August before the assembling of the General Court" of 2024 is August 2, 2023.

C. At least ten registered voters signed the Petition and filed it with the Attorney General in June 2022.

D. June 2022 is "not later than" August 2, 2023.

35. When certified, Plaintiffs intend to file their Initiative "with the secretary of the commonwealth not earlier than the first Wednesday of the September before the assembling of the General Court into which they are to be introduced."

A. "[T] first Wednesday of the September before the assembling of the General Court" of 2024 is September 6, 2023.

B. Plaintiffs are, in this very action, prosecuting the appeal of the Attorney General's refusal to certify, so that they may have a certified Initiative to file with the Secretary "not earlier than" September 6, 2023.

36. Plaintiffs followed this procedure because they understood their Initiative would raise constitutional questions. They therefore intended to assure adequate time for any necessary appeal of the Attorney General's decision. Plaintiffs accept that the constitutional argument they are presenting is of first

impression, both within Massachusetts, and for the United States Supreme Court. Rather than attempting to litigate that question in the compressed period between late 2023 and May 2024, they chose instead to present the Initiative to the Attorney General in June 2022, which is "not later than the first Wednesday of the August before the assembling of the General Court into which it is to be introduced" — which will be August 2, 2023.

37. Consistent with the dual purposes of preclearance, the Massachusetts Constitution requires that a petition be certified before being filed with the Secretary and before the Secretary provides blanks for the collection of signatures.

A. To require signatures be collected before certification would conflict with the objective to lower the burden of collection.

B. To require signatures to be collected before certification would conflict with the objective to assure that only appropriate initiatives be carried to the public.

38. Because the Attorney General refused to certify Initiative 22-01, until her determination is reversed, the plain text of the Massachusetts Constitution directs that the Secretary cannot accept proponents' petition, nor issue blanks to use to collect signatures.

39. Notwithstanding this plain text, the Attorney General has advised Plaintiffs that when she declines to certify an initiative petition, it is her practice to

offer to enter a Stipulated Order with proponents allowing them to file petitions with the Secretary and to begin collecting signatures on blanks prepared by the Secretary.

40. The Attorney General has offered to enter such a Stipulated Order for the Plaintiffs.

41. Requiring proponents to participate in such a procedure is inconsistent with Article 48, especially so when the petition covers an alleged "Excluded Matter." It is likewise inconsistent with this Court's instruction for how Article 48 is to be construed.

A. One purpose manifest in the plain language of the constitution is to avoid the circulation of petitions covering excluded matters, so as to avoid the initiative process becoming a means by which rights protecting minorities might be used by populists to sow division within the Commonwealth. A requirement to collect signatures to appeal the Attorney General's determination that a matter is "Excluded" contravenes this objective.

B. A second purpose manifest in the plain language of the Constitution is to provide proponents with certainty about their initiative before they bear the burden of collecting signatures. A requirement to collect signatures simply to be able to appeal a contrary Attorney General's determination would

impose undue burdens on proponents before they have certainty that their petition could appear on the ballot.

(1) Plaintiffs intend to rely upon volunteers to gather the signatures necessary to place the Petition on the ballot.

(2) Volunteers would be unlikely, rationally, to devote the substantial energy necessary to gathering signatures in the face of the Attorney General's judgment, fearing that even if they were successful, the Petition might not appear on the ballot.

(3) Likewise, political parties and non-profits would be unlikely to support a volunteer petition drive for a petition that has been ruled as an "Excluded Matter" under the initiative process.

(4) While Plaintiffs could rely upon paid petition services to gather signatures in 2022, paid petition signature costs during an off-year cycle would reach $15-$20 per signature, two to three times higher than the estimated cost of gathering signatures in the fall of 2023. *See* Affidavit of Harold Hubschman, Ex. D. Such costs may well be appropriate for a petition that has been certified.

They are extreme simply to secure a right to appeal a contrary Attorney General ruling.

C. Finally, a requirement to collect signatures to appeal the Attorney General's determination that a matter is "Excluded" is inconsistent with this Court's directive to "construe Article 48 in a manner 'mindful' that art. 48 establishes a 'people's process.'" *See*, *e.g.*, *Anderson v. Att'y Gen.*, 479 Mass. 780, 785 (2018) (first quoting in part *Bates v. Director of the Office of Campaign & Political Fin*., 436 Mass. 144, 154 (2002), and then quoting *Buckley v. Secretary of the Commonwealth*, 371 Mass. 195, 199 (1976)).

42. Recognizing that the language of Article 48 does not compel her reading of Article 48, the Attorney General has made equitable arguments in prior cases to support her contention that the "remaining required signatures" are due in December of the year the Attorney General has ruled, regardless of whether the petition is intended for the following year's ballot, or the ballot two years hence. *See*, *e.g.*, Letter from the Office of the Att'y General to the Single Justice dated September 26, 2016, in *PassMass Amendment, et al., v. Attorney General and Secretary of The Commonwealth,* No. SJ-2016-0374 (D.E. #5), Ex. E. These arguments fail.

A. The Attorney General defends her process citing the interest in conserving judicial resources. But when there is a genuine legal question about an

"Excluded Matter," the appropriate issue is in what context that question should be resolved. By filing their petition in an even-numbered year, two years before the Initiative would appear on the ballot, Petitioners have given this Court ample opportunity to consider the matter, rather than forcing a resolution within the context of an appeal briefed and decided on an expedited basis.

B. The Attorney General defends her process on the grounds that it will avoid opinions that might turn out to be advisory if the petitioners ultimately fail to collect the requisite signatures. Ex. E. Even assuming that interest might justify a bond of sufficient size to assure that signatures on a petition this Court ruled was not excluded would be collected. It does not justify imposing what is, in effect, a $1 million penalty simply to appeal the Attorney General's legal determination. *See supra,* ¶ 41(B)(iv). In no other context of Massachusetts law is a plaintiff required to expend $1 million simply to preserve its right to appeal a legal determination of the Attorney General. Such a burden certainly makes no sense of the "people's process" that this Court has described Article 48 to be.

C. Justices of this Court have recognized that the precise question raised by this complaint — whether signatures on a petition filed in an even-numbered year, two years before it could appear on the ballot, must be collected before a decision of the Attorney General could be appealed — is unresolved.

(1) In response to the parties' written submissions including the Attorney General's letter cited above in *PassMass Amendment*, Justice Lenk, sitting as single justice, observed: "[t]he defendants suggest in their letter dated September 26, 2016, the plaintiffs are not entitled to a ruling on the merits of their claim challenging the certification decision unless and until they first gather sufficient signatures to put the petition on the ballot." *See* J. Lenk's Memorandum of Decision in *PassMass Amendment, et al. v. Attorney General and Secretary of the Commonwealth*, SJ-2016-0374, D.E. #8, a true and accurate copy of which is attached hereto as Ex. F, at 3-4.

(2) Justice Lenk then wrote: "That may or may not be correct; I leave that to be decided if and when the plaintiffs choose to pursue that route." *Id.*

D. While other justices sitting as a single justice have entered orders, apparently in the form proposed by the Attorney General, dismissing as moot cases brought by pro-se plaintiffs for failure to deliver signatures to the Secretary by the first Wednesday in December, so far as Plaintiffs' counsel have been able to determine, all of those orders appear to have been entered in cases

where the plaintiff was represented pro se, none was accompanied by a reasoned opinion analyzing the text of Article 48, and none was based on the record presented here. *See*, *e.g.*, *Bokron, et al. v. Attorney General and Secretary of the Commonwealth*, SJ-2020-0613, D.E. #5; *Bokron, et al. v. Attorney General and Secretary of the Commonwealth*, SJ-2017-0326, D.E. #9.

E. Whatever the merits of the Attorney General's equitable arguments, they cannot stand in the face of the plain language of Article 48.

(1) Article 48 gives proponents the choice of the year during the two-year cycle for ballot initiatives to have an initiative submitted to the General Court.

(2) Plaintiffs have chosen to have their petition submitted to the General Court that will convene in January 2024.

(3) Based upon that choice, and the plain language of Article 48, Plaintiffs must submit a certified petition to the Secretary "not earlier than the first Wednesday of the September before the assembling of the General Court."

(4) That Wednesday is September 6, 2023.

(5) To have a certified petition to submit on or after September 6, 2023, Plaintiffs submitted to the Attorney General their proposed initiative "not later than the first

Wednesday of the August before the assembling of the General Court."

(6) That Wednesday is August 2, 2023.

(7) Petitioners submitted their Initiative to the Attorney General before that date, in June 2022.

(8) As the language of Article 48 directs, Plaintiffs are not authorized to collect signatures before they file a "certified petition" with the Secretary.

(9) Plaintiffs are prosecuting this appeal so that they may have a "certified petition" to file with the Secretary on or after September 6, 2023.

COUNT I
(Declaratory Relief)

47. Plaintiffs restate and reallege the allegations of the paragraphs set forth above as if restated and realleged herein.

48. There is an actual controversy between Plaintiffs and the Attorney General as to whether the Attorney General erred in denying certification of the Petition on the basis that it violated "freedom of speech." This controversy will be terminated by this Court's determination of whether the Attorney General erred.

49. For the reasons set forth above, the Attorney General did err.

WHEREFORE, Plaintiffs request the relief set forth below:

COUNT II
(Declaratory Relief)

50. Plaintiffs restate and reallege the allegations of the paragraphs set forth above as if restated and realleged herein.

51. There is an actual controversy between the Plaintiffs and the Attorney General as to whether Plaintiffs must file "the remaining required signatures" with the Secretary by the first Wednesday in December 2022 or December 2023, and thus whether the Petition and/or this action will be moot if the Plaintiffs do not deliver the signatures by the first Wednesday in December 2022. This controversy will be terminated by the Court's ruling on this issue.

52. As outlined above, because Plaintiffs filed their Petition and the Attorney General declined to certify it in an even-numbered year, Article 48 does not require the Plaintiffs to deliver the signatures to the Secretary until December 2023.

WHEREFORE, Plaintiffs request the relief set forth below:

PRAYERS FOR RELIEF

Plaintiffs respectfully request this Court enter judgment:

A. On Count I, declaring that the Attorney General erred in refusing to certify the Petition as compliant with Article 48, and that the Petition complies with Article 48;

B. On Count II, declaring that the Plaintiffs are not required to deliver the "remaining required signatures" required by Article 48 to the Secretary before the first Wednesday of December 2023; and

C. On both Counts, granting the Plaintiffs such other relief as may be appropriate and just.

Respectfully Submitted,

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CATHERINE BRUN-COTTAN,
GEORGES BRUN-COTTAN,
LEIGH CHINITZ,
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Dated: October 24, 2022

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