

NORTH CAROLINA COURT OF APPEALS

COMMUNITY SUCCESS)	
INITIATIVE, et al.,)	
)	<u>From Wake County</u>
Plaintiffs,)	
v.)	No. 19 CVS 15941
)	
TIMOTHY K. MOORE, et al.,)	
)	
Defendants.)	
)	
_____)	

STATE BOARD OF ELECTIONS DEFENDANTS'
RESPONSE TO PETITION FOR WRIT OF SUPERSEDEAS

RETRIEVED FROM PACRAC DOCKET.COM

TABLE OF CONTENTS

TABLE OF CASES AND AUTHORITIES	ii
FACTUAL BACKGROUND	4
DISCUSSION.....	8
CONCLUSION.....	15
CERTIFICATE OF SERVICE.....	17
ATTACHMENT	

RETRIEVED FROM DEMOCRACYDOCKET.COM

TABLE OF CASES AND AUTHORITIES

CASES

Pender Cty. v. Bartlett, 361 N.C. 491, 649 S.E.2d 364 (2007)3
Reynolds v. Sims, 377 U.S. 533 (1964)4

STATUTES

N.C.G.S. § 13-16
N.C.G.S. § 163-82.6(d)7
N.C.G.S. § 163-82.14(c)(3)9
N.C.G.S. § 163-227.2(b)7
N.C.G.S. § 163-227.10(a)7

RULE

N.C. R. App. P. 23(d).....1

RETRIEVED FROM DEMOCRACYDOCKET.COM

No. P22-153

TENTH DISTRICT

NORTH CAROLINA COURT OF APPEALS

COMMUNITY SUCCESS)	
INITIATIVE, et al.,)	
)	<u>From Wake County</u>
Plaintiffs,)	
v.)	No. 19 CVS 15941
)	
TIMOTHY K. MOORE, et al.,)	
)	
Defendants.)	
_____)	

**STATE BOARD OF ELECTIONS DEFENDANTS’
RESPONSE TO PETITION FOR WRIT OF SUPERSEDEAS**

**TO: THE HONORABLE CHIEF JUDGE AND ASSOCIATE JUDGES
OF THE NORTH CAROLINA COURT OF APPEALS.**

Pursuant to Appellate Rule 23(d), the North Carolina State Board of Elections and its members (“State Board Defendants”) hereby respond to Legislative Defendants’ petition for writ of supersedeas seeking a stay pending appeal of the superior court’s 28 March 2022 final order in the above-captioned case.

The State Board Defendants take no position on the relief requested by the Legislative Defendants and defer to the Court's discretion. The State Board Defendants submit the following information to ensure the Court has full information regarding the administrative steps that are in process to comply with the superior court's 28 March 2022 order.

The superior court's order included a provision enjoining the State Board "from preventing any person convicted of a felony from registering to vote or voting due to probation, parole, or post-release supervision." (Mar. 28, 2022 Order p. 64, ¶ 2, attached to Legislative Defs.' Pet. as Ex. 17) In accordance with that mandate, the State Board has directed all county boards, among other things, not to reject pending applications for registration from applicants who are on felony probation, parole, or post-release supervision.

Further implementation efforts are ongoing, as explained in more detail below. In light of the upcoming 17 May 2022 primary and associated deadlines which precede it, if further court orders so direct, the State Board will need to start fully processing the pending registration applications from non-incarcerated individuals who are on probation, parole, or post-release supervision due to felony convictions in the coming days to be able to accomplish all administrative tasks required to implement this change before the start of early voting on 28 April. Given the time it will take for this

implementation, as detailed below, if the Court should deny Legislative Defendants' petition and dissolve the temporary stay, State Board Defendants respectfully suggest that such a decision be rendered before 18 April 2022, which will allow the Board sufficient time to have all necessary changes in place prior to 28 April.

Also included below is information about the additional administrative steps required to comply with the superior court's order with full implementation of voter registration for those individuals who are on probation, parole, or post-release supervision due to felony convictions. The State Board Defendants request that the Court consider the State Board's interest in providing consistent communications to voters about their eligibility, as well as the administrative issues presented by changes to election procedures at this stage of the election process. As explained below, the primary is on 17 May 2022, voter registration before that primary ends on 22 April, and early voting for the primary starts on 28 April. The avoidance of "disruption to the ongoing election cycle" is a critical consideration for a North Carolina court considering injunctive remedies regarding voting rules. See *Pender Cty. v. Bartlett*, 361 N.C. 491, 510, 649 S.E.2d 364, 376 (2007) ("[A] court is entitled to and should consider the proximity of a forthcoming election and the mechanics and complexities of state election laws, and should act and

rely upon general equitable principles.” (quoting *Reynolds v. Sims*, 377 U.S. 533, 585 (1964)).

FACTUAL BACKGROUND

Plaintiffs commenced the action in which the superior court entered its 28 March 2022 final judgment in November 2019. (See Mar. 28, 2022 Order p. 3, ¶ 1) Based on a motion filed by Plaintiffs, the superior court entered a preliminary injunction on 4 September 2021. (See *id.*, pp. 3-4, ¶ 3)

At a 23 August 2021 hearing, the superior court orally issued an expanded preliminary injunction that required the State Board Defendants to ensure that all persons serving felony community supervision could register to vote and could vote. (See *id.* pp. 4-5, ¶ 6) In order to implement that preliminary injunction, the superior court directed the State Board to refrain from refusing registration to any person on community supervision. The court expressly directed the State Board to immediately implement the expanded injunction starting that day and not to wait for a written order from the court. Pursuant to that express directive, the State Board immediately worked to implement the superior court’s expanded injunction. The superior court would later enter a written order to this same effect on 27 August 2021. (See *id.*)

Both the State Board Defendants and Legislative Defendants appealed the superior court’s order on the expanded preliminary injunction. (See

Community Success Initiative v. Moore, Nos. P21-340 & 22-136) Legislative Defendants also sought a stay from the superior court of its expanded preliminary injunction, which that court denied. They then sought a writ of supersedeas in this Court, which was granted on 3 September 2021. (See *Community Success Initiative v. Moore*, No. P21-340)

That same day, Plaintiffs sought a writ of supersedeas in the Supreme Court of North Carolina. On 10 September 2021, the Supreme Court issued an order on plaintiffs' petition for writ of supersedeas. The Supreme Court ordered that "the status quo be preserved pending defendant's appeal of the expanded preliminary injunction issued initially by the trial court on 23 August 2021 in open court by maintaining in effect the original preliminary injunction issued on 4 September 2020 as it was understood at the time and implemented for the November 2020 elections." (Sept. 10, 2021 N.C. Sup. Ct. Order, No. 331P21-1, attached to Legislative Defs.' Pet. as Ex. 22, Ex. A). The Supreme Court also ordered that this Court's stay entered on September 3, 2021, "be implemented prospectively only, meaning that any person registered to vote at a time when it was legal for that person to register under then-valid court orders as they were interpreted at the time, shall remain legally registered voters." (*Id.*) The Supreme Court directed the State Board not to remove from any database any person legally registered under the expanded preliminary injunction between

23 August 2021 and 3 September 2021, and declared those individuals were legally registered voters until further order was entered. Finally, the Supreme Court otherwise denied the petition for writ of supersedeas without prejudice.

The appeal of the expanded preliminary injunction order remains pending in this Court. The parties requested that this Court hold the appeal in abeyance until the superior court issued its final order. Based upon that motion, this Court extended the deadline for the State Board Defendants and Legislative Defendants to file their Appellant Briefs until 18 May 2022.

As noted above, the superior court issued its final order this past Monday, 28 March 2022. Therein, that court declared the statute challenged by this litigation, N.C.G.S. § 13-1, in violation of the state Constitution's Equal Protection and Free Speech Clauses, to the extent it denied the franchise to persons on felony probation, parole, or post-release supervision. The superior court also permanently enjoined the State Board and others "from preventing any person convicted of a felony from registering to vote or voting due to probation, parole, or post-release supervision." (Mar. 28, 2022 Order p. 64, ¶ 2) The court clarified that "if a person otherwise eligible to vote is not in jail or prison for a felony conviction, they may lawfully register and vote in North Carolina." (*Id.* at 65, ¶ 3)

On the same day that the superior court issued its order, 28 March 2022, absentee ballots distribution for the 17 May 2022 primary began.¹ See N.C.G.S. § 163-227.10(a) (providing that absentee ballots are distributed 50 days before the primary). Voter registration before the primary will end on 22 April 2022.² See *id.* § 163-82.6(d) (providing that voter registration ends 25 days prior to the primary). And early voting for the primary, during which eligible individuals may register and vote at the same time, starts on 28 April 2022,³ see *id.* § 163-227.2(b).

Legislative Defendants filed a notice of appeal to this Court on 30 March 2022. (Not. of Appeal, attached to Legislative Defs.' Pet. as Ex. 1) On that same day, they also filed an emergency motion for stay pending appeal, which was denied by the superior court last Friday, 1 April 2022. (*Id.*, Exs. 2 & 17)

On 31 March 2022, Plaintiffs filed a Notice in superior court alleging that State Board Defendants were not in compliance with that court's 28 March 2022 order. (*Id.*, Ex. 24) In its Response, State Board Defendants established their compliance with the superior court's order, explained the manner by

¹ [Mailing of Absentee Ballots | 2022 Statewide Primary | NCSBE](#) (Last visited Apr. 5, 2022).

² [Voter Registration Deadline | 2022 Statewide Primary | NCSBE](#) (Last visited Apr. 5, 2022).

³ [One-Stop Early Voting Period Starts | 2022 Statewide Primary | NCSBE](#) (last visited Apr. 5, 2022).

which they were complying, and invited the superior court's guidance on compliance. (*See id.*, Ex. 23) As of the filing of the instant Response, the superior court has not addressed Plaintiffs' Notice.

On 1 April 2022, Legislative Defendants filed in this Court a petition for writ of supersedeas and motion for temporary stay. On 4 April 2022, Plaintiffs filed a bypass petition in the Supreme Court of North Carolina, seeking immediate review in the North Carolina Supreme Court.

This Court issued an order granting Legislative Defendants' motion for temporary stay yesterday, 5 April 2022. In that order, the Court directed the State Board to order felon voter registration applications held and not to act on the applications on until further order of this Court. (Order Granting Temporary Stay, No. P22-153 (Apr. 5, 2022)). The State Board is following that directive. (*See* Apr. 5, 2022 Email to Cty. Bds., attached to this Resp.)

DISCUSSION

Time is of the essence in implementing any changes to the administrative processes involved in conducting the upcoming 17 May 2022 primary election, as well as to the processes involved in conducting the other, subsequent elections which will occur this year.

Pursuant to the superior court's 28 March 2022 order and within less than 24 hours of receiving it, the State Board sent instructions to county boards

to comply with that order by ensuring that no one will be denied registration status. (See Mar. 29, 2022 Email to Cty. Bds., attached to Legislative Defs.' Pet. as Ex. 19) The State Board instructed the county boards not to generate or send felon denial letters to voters and not to send removal letters to voters who are on probation, parole, or post-release supervision. The Board also instructed county boards to hold, pending further instruction, any registration applications they receive from voters who are on probation, parole, or post-release supervision. Pursuant to this Court's Order granting the temporary stay, the Board will continue to hold those application and not act on them, pending further order from this Court. (See Apr. 5, 2022 Email to Cty. Bds., attached to this Resp.)

The State Board also suspended the automated removal process for non-incarcerated felons who were already in the removal queue in the Statewide Election Information Management System ("SEIMS") software. In accordance with N.C.G.S. § 163-82.14(c)(3), 35 days after a felon removal letter is generated, SEIMS will automatically process the record for removal; to prevent this automated process from removing non-incarcerated felons who were already in the removal queue, the State Board created a customized process that it applied to the over 800 voter registration records that were in the removal queue. The State Board also instructed the county boards to research

individual cases where a voter registration was in the removal queue and the State Board could not match it to the felon matching list; only after the county boards conducted an individual review and determined that the voter was currently incarcerated would that registration be processed for removal. . The State Board has further drafted revised voter registration forms—of which there are 19 varieties, depending on the method of registration—that could be quickly placed into circulation. And State Board staff have developed plans to carry out the various other administrative processes that would be required to implement new eligibility rules, including revisions to the SEIMS software coding used for in-person voting by county elections officials in thousands of locations across the state.

These steps demonstrate compliance with the superior court’s 28 March 2022 order: no one covered by the court’s order is being denied registration status or being denied the opportunity to vote in this election. The State Board made it clear to county boards that the directive to “hold” registration applications from voters on felony probation, parole, or post-release supervision was only temporary, directing those boards to proceed in this manner “until further instruction,” to allow the Board to ensure that its actions were appropriate.

The State Board Defendants complied with the superior court's order in this manner in a good-faith attempt to avoid any possible conflict with the Supreme Court's 10 September 2021 order. The Board recognizes the preliminary injunction stayed by the Supreme Court has now merged into the permanent injunction, and the appeal of the preliminary injunction is now likely moot. But there is no order dismissing that appeal and it therefore remains pending. As previously stated, the Supreme Court's order required that the "status quo be preserved pending defendant's appeal of the expanded preliminary injunction issued initially by the trial court on 23 August 2021 in open court by maintaining in effect the original preliminary injunction issued on 4 September 2020 as it was understood at the time and implemented for the November 2020 elections." (Sept. 10, 2021 N.C. Sup. Ct. Order, No. 331P21-1, attached to Legislative Defs.' Pet. as Ex. 22, Ex. A) Though the appeal itself may be moot, there has been no action by the appellate courts to dispose of that appeal.

In considering Legislative Defendants' petition for writ of supersedeas, the State Board Defendants wish to apprise this Court of the additional administrative steps required to comply with the superior court's order with full implementation of voter registration for non-incarcerated individuals who are on felony probation, parole, or post-release supervision due to felony

convictions. The State Board Defendants provide the following to give the Court information about the complexity of the task at hand. The State Board Defendants stand ready to provide additional details, along with supporting documents, at the Court's request.

Implementing a change in felon registration processing takes considerable time and effort and largely depends on proper administration by the 100 county boards of elections' staff. Also, having multiple forms in circulation and contradictory guidance within a short period of time creates a risk of confusion both to voters and county administrators. Three elections will occur this year—a May 17 primary, July 26 municipal election and any second primaries, and November 8 general election—and any change in the qualifications to vote, especially if there were multiple changes in course during this time, may affect the orderly administration of the election. The voter registration deadline for the upcoming May 17 primary is April 22,⁴ and it is essential that the State Board receive clarity prior to that time as to what the qualifications to vote will be for elections this year.

Changes to forms coded into SEIMS must take place to implement the change in qualifications to vote. Necessary changes include altering one-stop

⁴ See n.2 *supra*.

applications and authorization-to-vote forms, the application for provisional voters, the military and overseas ballot package, and other voter documents. Some of these applications and forms are populated through the State Board's e-pollbook system in SEIMS that is used by county boards during early voting and on Election Day. Those changes, which the Board estimates will take seven business days to complete, must be completed by 27 April 2022 for the changes to be in place prior to the start of early voting on 28 April. As a result, if the Court should deny Legislative Defendants' petition and dissolve the temporary stay, State Board Defendants respectfully suggest that such a decision be rendered before 18 April, which will allow the Board sufficient time to have all necessary changes in place prior to 28 April.

Absentee voting is already underway for the May primary, and absentee envelopes have been procured and printed and sent out to voters who have requested absentee ballots. State Board staff estimate that to source materials, as well as build, reprint and deliver new absentee envelopes, could take 10 to 12 weeks. Therefore, it is not possible to change the envelopes for the May primary.

Additionally, printing and distributing revised forms can take a significant amount of time and, because of that, there is a risk of having multiple versions of forms in circulation. There are likely hundreds of

thousands of voter registration forms currently in circulation. They are in every county board office, Department of Motor Vehicles (“DMV”) office, local Department of Social Services (“DSS”) and Special Supplemental Nutrition Program for Women, Infants, and Children (“WIC”) offices, and in the hands of dozens of political and civic organizations throughout the state. The State Board has been working to resolve a backlog of registration forms, which resulted, in part, from the need to replace the stock of previous forms due to changes required by the earlier preliminary injunction in this matter. If the State Board were to revise those forms and order new ones, it would take significant time, and substantial funds that have not been allocated for that purpose, to completely replace forms in circulation. If the current forms were withdrawn, it would likely mean that voter registration forms would not be available to many individuals wanting to register, and groups conducting voter registration, in advance of the upcoming April 22 voter registration deadline.

It is not just State Board systems that would need to be changed. The State Board will work with the Department of Public Safety (“DPS”) to have them update the data feed the State Board receives to remove from the felon reports those who are now eligible to register under the trial court’s order. Much of the felon removal process is automated and does not parse the supervision status of a felon. Therefore, when changes to the felon eligibility

requirements are made, the workaround process of ensuring all eligible individuals are permitted to register, while also ensuring ineligible individuals are not permitted to register, is highly time- and labor-intensive, and requires the involvement of local county boards, particularly in cases where a manual review of individual records is required due to gaps data matching.

The State Board will also need to work with the DMV to update its system, which is used for online voter registration. A large portion of registration occurs via online registration through the DMV. The DMV and its vendor typically require extensive documentation and months for the State Board to accomplish changes to the online voter registration system. The State Board will also have to ensure that the Department of Health and Human Services and the many county DSS and WIC agencies that it oversees get the right information and implement the changes correctly when they are conducting registration. The same is true with local DMV offices.

CONCLUSION

Accordingly, the State Board Defendants respectfully request that the Court consider these administrative issues as it reaches its decision on the pending petition.

Respectfully submitted this the 6th day of April, 2022.

JOSHUA H. STEIN
Attorney General

/s/ Mary Carla Babb
Mary Carla Babb
Special Deputy Attorney General
N.C. State Bar No. 25731
Email: mcbabb@ncdoj.gov

I certify that the attorneys listed below have authorized me to list their names on this document as if they had personally signed it.

Terence Steed
Special Deputy Attorney General
N.C. State Bar No. 52809
tsteed@ncdoj.gov

N.C. Department of Justice
Post Office Box 629
Raleigh, NC 27602
Phone: (919) 716-0185

*Counsel for the State Board
Defendants*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the forgoing document was served on the parties to this action via email and was addressed to the following counsel:

FORWARD JUSTICE
400 Main Street, Suite 203
Durham, NC 27701
Daryl Atkinson
daryl@forwardjustice.org
Caitlin Swain
cswain@forwardjustice.org
Whitley Carpenter
wcarpenter@forwardjustice.org
Kathleen Roblez
kroblez@forwardjustice.org
Ashley Mitchell
amitchell@forwardjustice.org

ARNOLD & PORTER KAYE
SCHOLER LLP
601 Massachusetts Avenue NW
Washington, DC 20001
Elisabeth Theodore
elisabeth.theodore@arnoldporter.com
R. Stanton Jones
stanton.jones@arnoldporter.com

PROTECT DEMOCRACY PROJECT
2120 University Avenue
Berkeley, CA 94704
Farbod K. Faraji
farbod.faraji@protectdemocracy.org

Counsel for Plaintiffs

COOPER & KIRK, PLLC
1523 New Hampshire Avenue, NW
Washington, DC 20036
Nicole Jo Moss
nmoss@cooperkirk.com
William V. Bergstrom
wbergstrom@cooperkirk.com
Joseph O. Masterman
jmasterman@cooperkirk.com
Peter Patterson
ppatterson@cooperkirk.com
David H. Thompson
dthompson@cooperkirk.com

K&L GATES, LLP
430 Davis Drive, Suite 400
Morrisville, NC 27560
Nathan A. Huff
Nate.Huff@klgates.com

Counsel for Legislative Defendants

This the 6th day of April, 2022.

/s/ Mary Carla Babb
Mary Carla Babb
Special Deputy Attorney General

RETRIEVED FROM DEMOCRACYDOCKET.COM

ATTACHMENT

April 5, 2022 Email to County Boards

RETRIEVED FROM DEMOCRACYDOCKET.COM

Babb, Mary Carla (Hollis)

From: Love, Katelyn <Katelyn.Love@ncsbe.gov>
Sent: Tuesday, April 5, 2022 7:54 PM
Cc: SBOE_Grp - Legal
Subject: RE: Update Regarding Court Order Restoring Felon Voting Rights
Attachments: Order P22-153.pdf

Directors (bcc State Board members),

The NC Court of Appeals today issued a temporary stay of the trial court's order that restored the voting rights of felons who are not incarcerated. The court also ordered that voter registration forms received from voters who would be eligible to register under the trial court's order not be denied but instead be held and not acted on until further order of the court. The stay will last while the court considers a petition filed by the legislative defendants seeking to permanently stay the trial court's order while this case is on appeal.

You should continue to follow the original guidance we sent in the email below, to **hold registrations for individuals who are not incarcerated**, including those on felony probation, parole and post-release supervision. Also, **do not print any letters in the I-Queue for the removal of non-incarcerated felons** who are existing registrants.

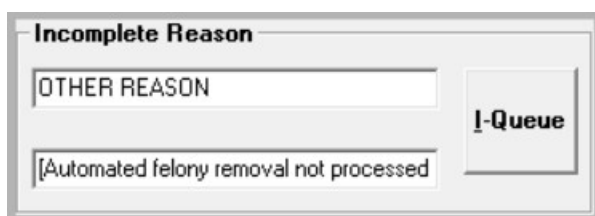
Below are two additional updates on carrying out the current stay:

State Board Pause to Automated 35-Day Removals

On March 30, the State Board ran a SEIMS script to stop the automatic removal of existing registrants who were matched for a felony conviction and were sent a notice of their ineligibility, as long as these registrants were not inmates. Typically, after 35 days have elapsed after printing these notices from the I-Queue and the voter has not appealed, SEIMS automatically removes the registrant. We stopped this automated process for approximately 800 registrants across the state who are not inmates, according to Department of Public Safety data. We worked individually with a small group of counties to clarify the inmate status of approximately 40 registrants that were in the removal process, as well.

Pre-Election Incomplete Letters

As a result of this pause in the 35-day removal process, some counties are noticing that these individuals are appearing in the I-Queue to receive a pre-election notice because of incomplete registration information. These records/notices list the incomplete reason of **Other Reason: [Automated felony removal not processed due to court order on 3/28/22]**. In accordance with previous guidance, **these notices need to be manually removed from VoterScan and not sent to voters**. Please note that printing these letters will not start the 35-day countdown for removal or denial of registration.



The screenshot shows a window titled "Incomplete Reason". It contains a text input field with the text "OTHER REASON" and a button labeled "I-Queue". Below the input field, there is a text box containing the text "[Automated felony removal not processed]".

The State Board is continuing to organize plans to implement the trial court's judgment, in the event that the Court of Appeals or the state Supreme Court orders that we proceed with implementation.

Sincerely,

Katelyn Love | General Counsel
o: 919-814-0756 | f: 919-715-0135



From: Love, Katelyn <Katelyn.Love@ncsbe.gov>
Sent: Tuesday, March 29, 2022 4:19 PM
Cc: SBOE_Grp - Legal <Legal@ncsbe.gov>
Subject: Update Regarding Court Order Restoring Felon Voting Rights

Directors (bcc State Board members),

Yesterday afternoon, a North Carolina Superior Court ruled that [the state law](#) restricting persons with felony convictions who are not incarcerated from voting or registering to vote is unconstitutional. Under this ruling, people who are serving a felony sentence outside a jail or prison are now eligible to register to vote in North Carolina. This includes people on felony probation, parole, or post-release supervision. The decision is attached.

We are currently working to determine how to implement this decision in light of (1) an imminent appeal of the decision; and (2) an apparently conflicting [order](#) from the North Carolina Supreme Court last year in the same case. That decision ordered that “the status quo be preserved” pending appeal of the expanded preliminary injunction, an appeal that is still ongoing.

Until further instruction, county boards of elections should keep registration applications of voters who are on probation, parole, or post-release supervision it receives in the Incomplete Queue. Do not generate or send felon denial letters to these voters, regardless of whether the application was received before or after Monday, March 28. Do not send a removal letter to voters who are on probation, parole, or post-release supervision.

To complete this process, counties can refer to the [DOC Felon County List](#), the [DOC Felon State Matching List](#) and the [N.C. DPS Offender Search](#) to confirm a registrant's status. The DOC Felon County List contains a “DOC Placement” column that will show whether the person is an inmate or on probation/parole. If a person is an **inmate** serving a felony conviction, they are ineligible to register to vote and you may proceed with your regular processes. Note that the DOC Felon State Matching List does not show whether a person is an inmate; therefore, you will need to also refer to the DOC Felon County List before processing a denial or a removal.

For registrants with **any status other than inmate**, the county should hold these registrations in the Incomplete Queue until further guidance is available. Counties should continue with the felony denial and removal processes for those classified as an inmate.

For the federal felon records found on Filezilla, the counties may use the [Federal Bureau of Prisons' Search](#). If a felon's record identifies a prison in the “Location” column, they are ineligible to register to vote and may be removed/denied registration per current processes.

Counties should not remove or deny a voter registration application unless they can confirm the person is an inmate serving a felony conviction. If you are unsure, please keep the record in the Incomplete Queue.

We will send further instructions as soon as possible to address how to ultimately process these records in the Incomplete Queue, and whether registration and voting forms will be updated.

Sincerely,

Katelyn Love | General Counsel
o: 919-814-0756 | f: 919-715-0135



RETRIEVED FROM DEMOCRACYDOCKET.COM