No. 23AP2362

In the Supreme Court of Wisconsin

JOSH KAUL, WISCONSIN DEPARTMENT OF SAFETY AND PROFESSIONAL SERVICES, WISCONSIN MEDICAL EXAMINING BOARD and CLARENCE P. CHOU, MD, PLAINTIFFS-RESPONDENTS,

CHRISTOPHER J. FORD, KRISTIN J. LYERLY and JENNIFER J. MCINTOSH, INTERVENORS-RESPONDENTS,

v.

JOEL URMANSKI, as DA for Sheboygan County, WI, DEFENDANT-APPELLANT,

ISMAEL R. OZANNE, as DA for Dane County, WI and JOHN T. CHISHOLM, as DA for Milwaukee County, WI, DEFENDANTS.

On Appeal from the Dane County Circuit Court,
The Honorable Diane Schlipper, Presiding,
Case No. 22CV1594

BRIEF IN SUPPORT OF CONDITIONAL PETITION TO INTERVENE, OR, IN THE ALTERNATIVE, TO FILE AMICUS BRIEF, ON BEHALF OF WISCONSIN RIGHT TO LIFE, WISCONSIN FAMILY ACTION, AND PRO-LIFE WISCONSIN

WISCONSIN INSTITUTE FOR LAW & LIBERTY

RICK ESENBERG
LUKE N. BERG
NATHALIE E. BURMEISTER

330 E. Kilbourn Ave., Ste. 725
Milwaukee, WI 53202
Phone: (414) 727-9455
Facsimile: (414) 727-6385

THOMAS MORE SOCIETY

ANDREW BATH

309 W. Washington Street
Suite 1250
Chicago, Illinois 60606
Phone: (312) 782-1680

Attorneys for Wisconsin Right to Life, Wisconsin Family Action, and Pro-Life Wisconsin

INTRODUCTION

Until two weeks ago, this case involved only statutory questions. Attorney General Josh Kaul, who filed this case and surely crafted his claims with care, raised various arguments for why Wis. Stat. § 940.04 no longer applies to prohibit abortion. Notably, he did not raise *any* constitutional challenge to the statute. Pet. App. 5–32. Likewise, the Intervenor-Respondents, in their proposed complaint, did not raise any claim based on a constitutional right to abortion.[1] The Circuit Court held, based on *State v. Black*, 188 Wis. 2d 639, 526 N.W.2d 132 (1994), that § 940.04 no longer applies to abortions. Pet. App. 56–67, 69–79. According to the normal rules of litigation, the door was shut on making claims in this suit that the state constitution protects a right to abortion.

Now, for the first time, in their supplemental bypass petitions, Attorney General Kaul and the Intervenor-Respondents seek to transform this case and use it as a vehicle to create a constitutional right to abortion in Wisconsin, all despite their inaction on this question below. As explained in more detail in the Proposed Intervenors' proposed response, this request is procedurally improper, unnecessary, clearly wrong on the merits, and raises a host of collateral issues.

The Wisconsin Right to Life, Wisconsin Family Action, and Pro-Life Wisconsin ("Proposed Intervenors") move to intervene, pursuant to Wis. Stat. § 809.13, both to oppose this late attempt to transform this case, and, if the Court allows this transformation, to oppose that claim on the merits. If this Court agrees with Proposed Intervenors and declines to allow the addition of a constitutional claim on appeal, Proposed Intervenors do not seek to intervene, and the Court can deny this motion. In the alternative, pursuant to Wis. Stat. § 809.19(7)(b),

[1] Intervenor-Respondents did raise a vagueness claim, a different kind of constitutional claim. R. 75:13–14.

Proposed Intervenors move to file their opposition to adding the constitutional claim as an amicus brief.

BRIEF FACTUAL AND PROCEDURAL BACKGROUND

On June 28, 2022, Attorney General Josh Kaul, together with several state agencies, filed this lawsuit in Dane County Circuit Court seeking "clarity" as to the meaning and applicability of Wis. Stat. § 940.04. R. 4, 34. Kaul's only claims were that § 940.04 is unenforceable because "subsequent enactments have superseded" it or "because of its disuse." *Id*. On November 18, 2022, the Circuit Court (the Honorable Diane Schlipper presiding), permitted three doctors to intervene. The intervening doctors also filed a proposed complaint, which likewise did not raise any claim to a right to abortion under Wisconsin's Constitution. R. 75. In the year and a half that this case has been pending, neither Kaul nor the intervening Physician Respondents ever so much as hinted that they sought a ruling that the Wisconsin Constitution creates a right to abortion.

On July 7, 2023, in response to a motion to dismiss filed by Defendant-Appellant Joel Urmanski, the Circuit Court ruled that § 940.04 "prohibits feticide and not abortion" and dismissed with prejudice all claims "premised on the assertion that Wis. Stat. § 940.04 prohibits abortions." R. 147:20–21. It reaffirmed this ruling in a final order released on December 5, 2023, issuing a declaration "that Wis. Stat. § 940.04 does not apply to abortions." R. 183:14.

Now, on appeal from a judgment entered *in their favor*, on the claims *they brought*, Kaul and the Physician Respondents (collectively, "Respondents") ask this Court to completely rework the litigation and use it to create a constitutional right to abortion in Wisconsin. Urmanski appealed the statutory holding and sought bypass from this Court on February 20, 2024. On February 27, 2024, Kaul filed a "supplemental

petition," and in it, for the first time in this litigation, seeks to add a constitutional claim.[2] Kaul Pet. 17–21.

In the accompanying Proposed Response, Proposed Intervenors explain in detail why this Court should reject Respondents' attempt to expand the scope of this case on appeal. But, if this Court grants the request, it should at the very least allow parties who would be adversely impacted by constitutionalizing abortion—like the Proposed Intervenors—to be heard on the question, since the Respondents' litigation strategy denied them the opportunity to intervene below.

Proposed Intervenors are three of Wisconsin's leading pro-life organizations that all oppose constitutionalizing abortion: Wisconsin Right to Life, Wisconsin Family Action, and Pro-Life Wisconsin. They all exist to protect the unborn, to advocate for alternatives to abortion, to encourage any woman considering an abortion to choose life instead, and to provide support for those who do, and they all expend substantial resources toward those goals. Weininger Aff. ¶¶4–17; File Aff. ¶¶4–16; Miller Aff. ¶¶ 4–14. Proposed Intervenors meet all the requirements for both mandatory and permissive intervention and should be allowed to join the lawsuit if this Court adds the constitutional claim.

ARGUMENT

I. If This Court Allows Respondents to Add a Constitutional Claim to This Case, the Proposed Intervenors Meet the Requirements to Intervene as of Right.

Under Wis. Stat. § 809.13, "[a] person who is not a party to an appeal may file in the court of appeals a petition to intervene in the appeal," and "[t]he court may grant the petition upon a showing that the petitioner's interest meets the requirements of s. 803.09 (1), (2), or (2m)."

[2] The Intervenor-Respondents, in their "response" on February 22, also seek to add a constitutional claim. Physician Respondents' Resp. 4.

Only the first two provisions of Wis. Stat. § 803.09 are relevant here. Wis. Stat. § 803.09(2), permissive intervention, is discussed in Part II, *infra*. But this Court need not reach that discussion because the Proposed Intervenors meet the requirements of § 803.09(1), intervention as of right. Under § 803.09(1), the Proposed Intervenors are entitled to intervene so long as they meet each factor of a four-part test:

> (1) timely application for intervention; (2) an interest relating to the property or transaction which is the subject of the action; (3) that the disposition of the action may as a practical matter impair or impede the proposed intervenor's ability to protect that interest; and (4) that the proposed intervenor's interest is not adequately represented by existing parties.

State ex rel. Bilder v. Delavan Tp., 112 Wis. 2d 539, 545, 334 N.W.2d 252 (1983). Importantly, Wisconsin courts take a "broader" and more "pragmatic approach to intervention as of right" than do many other courts. *Id.* at 548. "[T]he criteria need not be analyzed in isolation from one another, and a movant's strong showing with respect to one requirement may contribute to the movant's ability to meet other requirements as well." *Helgeland v. Wis. Municipalities*, 2008 WI 9, ¶39, 307 Wis. 2d 1, 745 N.W.2d 1 (footnote omitted).

Each factor is met here.

A. This Petition is Timely.

Wis. Stat. § 803.09(1) requires that applications for intervention of right be "timely." While "there is no precise formula to determine whether a motion to intervene is timely," this Court primarily considers whether "in view of all the circumstances the proposed intervenor acted promptly," and secondarily "whether the intervention will prejudice the original parties to the lawsuit." *Bilder*, 112 Wis. 2d at 550.

First, the Proposed Intervenors have acted promptly. The earliest they could have learned that their interests were imperiled was in late

February, when Kaul and the Intervenor-Respondents indicated for the first time that they would attempt to transform this case into a vehicle to create a constitutional right to abortion in Wisconsin. And Proposed Intervenors have filed their motion to intervene and proposed response to Kaul's supplemental bypass petition within the 14-day time limit to respond to a bypass petition. Wis. Stat. § 809.60(2). Considering the need to organize and draft these filings—which of necessity address a novel constitutional question—this is prompt under any measure. *See, e.g.*, *C.L. v. Edson*, 140 Wis. 2d 168, 177–80, 409 N.W.2d 417 (Ct. App. 1987) (intervention brought nine months after judgment was prompt based on when the intervenor was able to learn that its interests were in danger); *City of Madison v. Wis. Emp. Rels. Comm'n*, 2000 WI 39, ¶11, 234 Wis. 2d 550, 610 N.W.2d 94 (no requirement in Wisconsin law that non-parties move to intervene within the statutory time period for filing a notice of appeal).

Second, intervention will not prejudice the original parties to the lawsuit. Because intervention is occurring at the appellate phase, the only relevant deadlines relate to briefing, and those deadlines will not be altered by the addition of the Proposed Intervenors as parties.

B. Proposed Intervenors Have Multiple Interests Related to and Imperiled by this Appeal.

Proposed Intervenors have multiple sufficient interests in this appeal. As a general rule, an interest is sufficient for intervention if the intervenor "will either gain or lose by the direct operation of the judgment." *Helgeland,* 2008 WI 9, ¶45; *see also City of Madison,* 2000 WI 30, ¶11, n.9 (citation omitted). In Wisconsin, courts evaluate asserted interests "practically, rather than technically," *Bilder*, 112 Wis. 2d at 547–48, and a proposed intervenor does not need to show that its interests would be "judicially enforceable" in a separate proceeding. *Wolff v. Town of Jamestown*, 229 Wis. 2d 738, 744, 601 N.W.2d 301 (Ct. App. 1999); *see also Helgeland*, 2008 WI 9, ¶46, n.46. Proposed

Intervenors have multiple interests sufficient for intervention in this action.

First, Proposed Intervenors have a legitimate and legally protectable interest in protecting Wisconsin's unborn children and promoting alternatives to abortion in Wisconsin. *See Dobbs v. Jackson Women's Health Org.,* 597 U.S. 215, 301 (2022) ("[L]egitimate interests include respect for preservation of prenatal life at all stages of development …") (citation omitted). All of the Proposed Intervenors exist to protect unborn life as much as possible, and a constitutional holding in this case will make it that much more difficult for Proposed Intervenors to achieve their objectives. Weininger Aff. ¶6; File Aff. ¶6; Miller Aff. ¶6.

Second, Proposed Intervenors have a financial interest in this action: they spend significant resources to reduce the incidence of abortion in Wisconsin and will need to significantly increase their spending if this Court constitutionalizes abortion. Weininger Aff. ¶¶8–14, 16; File Aff. ¶¶9–13, 15; Miller Aff. ¶¶7–11, 13. Such an interest is sufficient to confer standing, and therefore sufficient for intervention under Wisconsin's "practical[ ], rather than technical[ ]" approach to intervention. *Bilder*, 112 Wis. 2d at 547–48; *see Common Cause Indiana v. Lawson,* 937 F.3d 944, 950 (7th Cir. 2019) (quoting *Crawford v. Marion County Election Bd*. 472 F.3d 949 (7th Cir. 2007) and explaining that if an organization will be "'compell[ed] [ ] to devote resources' to combatting the effects of [a] law that [is] harmful to the organization's mission," the organization has suffered an injury sufficient to confer standing); *see also League of United Latin American Citizens ((LULAC) of Wis. v. Deininger*, 2013 WL 5230795 at *1 (E.D. Wis. September 17, 2013) (a voting rights organization that needed "to divert their resources away from their … usual activities to deal with the effects of [a new law]" sustained an injury sufficient for standing).

Proposed Intervenors currently expend substantial financial resources to promote abortion alternatives and to reduce the incidence of abortion as much as possible. Weininger Aff. ¶¶8–12; File Aff. ¶9; Miller Aff. ¶¶7–8. Some Proposed Intervenors also expend substantial financial resources to provide direct material assistance to people affected by abortion, such as those who are recovering from abortion or those who need financial assistance to make day-to-day parenthood possible. Weininger Aff. ¶11–12.

Proposed Intervenors' interest in continuing these efforts will be directly and adversely impacted if abortion is constitutionalized, which will undoubtedly increase the number of women considering and seeking abortions in Wisconsin and cast doubt on the validity and enforceability of Wisconsin's current abortion-related laws. Weininger Aff. ¶¶13, 15; File Aff. ¶¶12, 14; Miller Aff. ¶¶10, 12. In response to these consequences, Proposed Intervenors will be required to significantly increase their financial expenditures to ensure that the public remains informed about the realities of abortion, the availability of abortion alternatives, and how to access abortion alternatives and resources. Weininger Aff. ¶¶13–14, 16; File Aff. ¶¶12–13, 15; Miller Aff. ¶¶10–11, 13. And, if this Court constitutionalizes abortion in Wisconsin in a way that expands access compared to nearby states, women may come to Wisconsin for abortions, further increasing the costs to Proposed Intervenors. Proposed Intervenors will also face the added cost of participating in the litigation challenges and/or legislative battles that will invariably ensue over the validity and enforceability of the abortion-related statutory requirements that will be called into question. Weininger Aff. ¶16; File Aff. ¶15; Miller Aff. ¶13.

Put simply, Proposed Intervenors are Wisconsin "organizations that have worked for years on the problem of [abortion] and are bracing for a real-world impact on their specific core mission[s] and lawful work." *Lawson*, 937 F.3d at 956; *see* Weininger Aff. ¶4, 8–14, 16–17; File Aff. ¶¶4, 9, 11–13, 15–16; Miller Aff. ¶¶4, 7–8, 10–11, 13–14. Proposed

Intervenors have an interest in participating in this action to ensure that abortion is not constitutionalized.

Third, Proposed Intervenors have legitimate concerns about the stare decisis effect that constitutionalizing abortion would have on their ability to protect the unborn in Wisconsin. Weininger Aff. ¶15; File Aff. ¶14; Miller Aff. ¶12. "[C]oncern with the stare decisis effect of a decision can be a ground for intervention." *Flying J., Inc. v. Van Hollen*, 578 F.3d 569, 573 (7th Cir. 2009) (citations omitted); *see N.Y. Pub. Int. Rsch. Grp., Inc. v. Regents of Univ. of State of N.Y,* 516 F.2d 350, 352 (2d Cir. 1975) ("We are not persuaded by the contention … that the [proposed intervenors] may protect their interests after an adverse decision in the instant case by attacking any new regulation on [a variety of] grounds. Such contention ignores the possible stare decisis effect of an adverse decision."). Because constitutionalizing abortion would directly affect Proposed Intervenors' interest in protecting the unborn by declaring abortion a constitutional right and calling into question a myriad of policy measures that Proposed Intervenors have supported, Proposed Intervenors have a sufficient interest in this action. Weininger Aff. ¶¶16–17; File Aff. ¶¶15–16; Miller Aff. ¶¶13–14.

Finally, Proposed Intervenors have an interest in protecting various abortion-related laws that they have advocated for and publicly defended. Proposed Intervenors have long supported many of Wisconsin's currently enacted abortion restrictions—the validity and enforceability of which will be called into question if abortion is constitutionalized. For example, Wisconsin Right to Life (founded in 1968), has supported many of the current laws, including the ultrasound requirement, the Safe Haven for Newborns Act, and the prohibition on taxpayer-funded abortions. Weininger Aff ¶¶4, 17. Wisconsin Family Action (founded in 2006) and Pro-Life Wisconsin (founded in 1992) have made similar efforts. File Aff. ¶¶4, 16; Miller Aff. ¶¶4, 14.

Courts have recognized that public interest groups who have played important roles in achieving certain policy measures have an interest in intervening to protect those policies from subsequent challenges. *See, e.g., Idaho Farm Bureau Fed'n, v. Babbitt*, 58 F.3d 1392, 1397 (9th Cir. 1995) ("A public interest group is entitled as a matter of right to intervene in an action challenging the legality of a measure it has supported."); *Mausolf v. Babbit*, 85 F.3d 1295, 1296–97 (8th Cir. 1996) (granting intervention as of right to conservation groups who had consistently engaged in prior proceedings to defend challenged restrictions at a national park); *Washington State Bldg. and Const. Trades Council, AFL-CIO v. Spellman*, 684 F.2d 627, 629–30 (9th Cir. 1982) (granting intervention of right to public interest group that had sponsored challenged legislation).

C. The Existing Parties Do Not Adequately Represent the Proposed Intervenors' Interests.

Intervention as of right is also appropriate when the existing parties do not "adequately represent" the "movant's interest[s]." Wis. Stat. § 803.09(1); *see Helgeland*, 307 Wis. 2d 1, ¶87. The attorney general, who typically represents the state in challenges to statutes—and who has a *duty* to defend their constitutionality, *State v. City of Oak Creek*, 2000 WI 9, ¶¶ 34–35, 232 Wis. 2d 612, 605 N.W.2d 526—takes the position that the statute is unconstitutional. Thus, Attorney General Kaul clearly does not adequately represent the Proposed Intervenors' interests.

The only other party who might argue that the Wisconsin Constitution does not protect abortion is Joel Urmanski, a single local government official whose duties to his constituents (many of whom doubtless favor expanded abortion rights) may require him to take a more permissive approach. Because the constitutional question has never been part of this case until now, Proposed Intervenors do not yet

know what position Urmanski will take or how he will support his position.

Separate from the merits of the constitutional question, Proposed Intervenors also do not know whether Urmanski will oppose, procedurally, the attempt to transform this case by adding the constitutional question. If he does not oppose adding that question, as the Proposed Intervenors do, strongly, then no other party will be taking the position that Proposed Intervenors' take.

Even if Urmanski takes a similar position to Proposed Intervenors, he still does not adequately represent their interests. A single district attorney does not represent the entire interests of the state at large, much less with respect to the monumental question of whether the Wisconsin Constitution protects the right to abortion or not. Nor does he represent the interests of Proposed Intervenors, who are all statewide organizations with special charitable, social, and political interests not encompassed within the duties of a district attorney. *See Utah Ass'n of Counties v. Clinton*, 255 F.3d 1246, 1255–56 (10th Cir. 2001) (citing a variety of federal circuit court cases and concluding that "the government's representation of the public interest generally cannot be assumed to be identical to the individual parochial interest of a particular member of the public because both entities occupy the same posture in the litigation. In litigating on behalf of the general public, the government is obligated to consider a broad spectrum of views, many of which may conflict with the particular interest of the would-be intervenor … This potential conflict exists even when the government is called upon to defend against a claim which the would-be intervenor also wishes to contest."). He at most represents the interests of his constituents in Sheboygan County. If this Court allows the addition of the constitutional question, this case obviously has implications far beyond Sheboygan County and the one statute at issue.

More importantly, even if Urmanski argues against a constitutional right to abortion in Wisconsin, it is unclear if he will make that argument in the same way as the Proposed Intervenors. As they explain in the accompanying Proposed Response, if this Court takes up the constitutional question, it will not only need to decide whether the Wisconsin Constitution protects abortion, but also how and to what extent. For example, will the Court adopt a "viability" standard? Will it permit exceptions, and if so, which ones? The Proposed Intervenors intend to argue that the Wisconsin Constitution does not protect a right to abortion at all, and that even if it does, it is as limited as possible. Proposed Intervenors are a coalition of the leading pro-life organizations in Wisconsin; their voice should be represented in this litigation if the Court takes on the constitutional question.

This is all that is required to demonstrate inadequate representation, a "minimal" burden that is met so long as the movant shows that representation "may be" inadequate. *Wolff v. Town of Jamestown*, 229 Wis. 2d 738, 747, 749, 601 N.W.2d 301 (Ct. App. 1999) (quoting *Trbovich v. United Mine Workers of America*, 404 U.S. 528, 538 n.10 (1972)) (inadequate representation where intervenor was "in a position to defend [challenged] decision more vigorously than the [existing party]" and "may have more at stake than the [existing party]")); *Trbovich*, 404 U.S. at 539 (Secretary of Labor did not adequately represent union member because although the Secretary was charged with protecting the individual's rights against his union, the Secretary also had "an obligation to protect the 'vital public interest in assuring free and democratic union elections that transcends the narrower interest of the complaining union member'" (quoting *Wirtz v. Local 153, Glass Bottle Blowers Ass'n*, 389 U.S. 463, 475 (1968))); *Armada Broad., Inc. v. Stirn*, 183 Wis. 2d 463, 471–72, 516 N.W.2d 357 (1994) (public school district could not, in defending against demand by records requestor to release employee records, adequately represent

proposed employee intervenor who had interest in preventing disclosure of those records).

The possibility that the Proposed Intervenors' and Urmanski's interests are or may become adverse is too great to permit exclusion of the Proposed Intervenors from this suit now.

II. Alternately, if This Court Accepts Respondents' Newly-Proposed Constitutional Question, Proposed Intervenors Meet the Requirements to Intervene Permissively.

Even if this Court concludes that the Proposed Intervenors may not intervene as of right, it may allow intervention in its discretion under Wis. Stat. § 803.09(2). Under that provision, intervention is permissible so long as the "movant's claim or defense and the main action have a question of law or fact in common," the motion is timely, and intervention will not "unduly delay or prejudice the adjudication of the rights of the original parties." The Proposed Intervenors have already discussed timeliness, lack of delay, and lack of prejudice. And their defense shares with the main action the new legal question of whether the Wisconsin Constitution protects abortion.

In exercising its discretion as to whether to permit the Proposed Intervenors to join this lawsuit, this Court should consider the historical importance of the constitutional question raised, the unfairness of the last-minute manner in which it was presented by the Respondents in this litigation, and the need to hear from *all* interested parties to ensure a just resolution. The Proposed Intervenors represent a coalition of the leading pro-life groups in Wisconsin, and their voice should be included if this Court entertains the attempt to radically transform the abortion landscape in Wisconsin. This issue is *the* issue they exist for, to advocate for life. Their inclusion in this suit will aid this Court in its disposition of this significant constitutional question.

III. Finally, if This Court Denies Intervention, It Should Accept the Proposed Response as an Amicus Brief.

Finally, if this Court denies both intervention as of right and permissive intervention, it should accept the Proposed Intervenors' proposed response as an amicus brief, pursuant to Wis. Stat. § 809.19(7). Proposed Intervenors have filed their motion and brief within 14 days of Kaul's supplemental bypass petition, as required by Wis. Stat. § 809.19(7)(b); *see id* § 809.60(2).

Again, Proposed Intervenors are a coalition of the leading pro-life groups in Wisconsin. They exist to protect the unborn, to advocate for alternatives to abortion, to encourage any woman considering an abortion to choose life instead, and to provide support for those who do. Weininger Aff. ¶¶4–17; File Aff. ¶¶5–16; Miller Aff. ¶¶4–14. Their voices are important ones on this subject, and their proposed brief will assist this Court in deciding whether to deviate from the normal litigation process and allow the addition of a constitutional claim at this late stage.

CONCLUSION

For the foregoing reasons, this Court should permit the Proposed Intervenors to intervene in this appeal, or, at the very least, accept their proposed response as an amicus brief in opposition to expanding the scope of this case.

Dated: March 12, 2024.

Respectfully submitted,

WISCONSIN INSTITUTE FOR
LAW & LIBERTY

Electronically signed by Luke N. Berg
Richard M. Esenberg (#1005622)
Luke N. Berg (#1095644)
Nathalie E. Burmeister (#1126820)

330 East Kilbourn Avenue, Suite 725
Milwaukee, WI 53202
Telephone: (414) 727-9455
Facsimile: (414) 727-6385
Rick@will-law.org
Luke@will-law.org
Nathalie@will-law.org

THOMAS MORE SOCIETY

Andrew Bath (#1000096)

309 W. Washington Street
Suite 1250
Chicago, Illinois 60606
Phone: (312) 782-1680
abath@thomasmoresociety.org

Attorneys for Wisconsin Right to Life, Wisconsin Family Action, and Pro-Life Wisconsin

CERTIFICATION

I hereby certify that this brief conforms to the rules contained in Wis. Stat. § 809.81 for a brief produced with a proportional serif font. The length of this brief is 3,922 words.

Dated: March 12, 2024.

Electronically Signed by Luke N. Berg

LUKE N. BERG