SUPREME COURT OF COLORADO 101 W. Colfax Avenue, Suite 800 Denver Colorado 80203 ORIGINAL PROCEEDING UNDER C.R.S. § 1-40-107(2) Appeal from the Ballot Title Board Petitioners: Barbara M.A. Walker and Don Childears v. Respondents: Earl Staelin and Robert Bows and Title Board: Suzanne Staiert, Dan Domenico, and Jason Gelander	FILED IN THE SUPREME COURT MAY 29 2012 OF THE STATE OF COLORADO Christopher T. Ryan, Clerk COURT USE ONLY
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PROPONENTS' ANSWER BRIEF TO DON CHILDEARS

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PROPONENTS' ANSWER BRIEF TO BARBARA M.A. WALKER

CERTIFICATE OF COMPLIANCE

I hereby certify that this brief complies with all requirements of C.A.R. 28 and C.A.R. 32, including all formatting requirements set forth in these rules. Specifically, the undersigned certifies that:

X The brief complies with C.A. R. 28(g) because it does not exceed 18 pages.

X The brief complies with C.A.R. 28(k).

For the party raising the issue:

_____ It contains under a separate heading (1) a concise statement of the applicable standard of appellate review with citation to authority; and (2) a citation to the precise location in the record (R._____, p._____), not to an entire document, where the issue was raised and ruled on.

For the party responding to the issue:

X It contains, under a separate heading, a statement of whether such party agrees with the opponent's statements concerning the standard of review and preservation for appeal, and if not, why not.

X I acknowledge that my brief may be stricken if it fails to comply with any of the requirements of C.A.R. 28 and C.A.R. 32.

Earl H. Staelin

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STATEMENT CONCERNING ISSUES PRESENTED FOR REVIEW

Proponents agree with the statement of issues 1 and 2 as stated by Childears. Proponents contend that Issues 3, 4 and 5 should be restated as set forth below because Childears' statement assumes facts that are in dispute and/or misreads controlling law:

3. As restated by Proponents: After the Review and Comment hearing did Proponents make substantive changes to the measures that were not in response to questions or comments by the Colorado Legislative Council and Office of Legislative Legal Services ("Council") in their written response or at the hearing that would deprive the Board of jurisdiction to set titles under C.R.S. § 1-40-105(2)?

4. As restated by Proponents: Do the Initiatives contain multiple subjects that are not related to each other such that the Title Board erred in approving the Initiatives under the single subject requirement?

5. As restated by Proponents: Did the Initiatives fail to disclose major provisions of the measures or are they otherwise vague and misleading such that the Title Board erred in setting titles for the Initiatives?

STATEMENT OF THE CASE

A. **Nature of the Case.** Proponents agree with statement of Childears regarding the nature of the case.

B. **Nature of the Measures, Course of Proceedings, and Disposition Before Title Board.**

Proponents agree with most of Childears' statement concerning these matters. However, Childears' statement mistakenly assumes that any political subdivision would be able to establish a bank. Instead, under state laws that govern the size of banks created under Colorado law, a bank must have a minimum capitalization. This would exclude many small political subdivisions. Also, while Childears correctly states that following the Review and Comment Hearing of April 6, 2012, Proponents made changes to the measures, such changes were not substantial, or Proponents had either submitted them to the Council before the meeting, consulted with the Council during or immediately after the hearing, or the changes were responsive to the written Questions and Comments of the Legislative Council.

SUMMARY OF ARGUMENT

The absence of one of the Proponents from the rehearing on April 26, 2012 and both Proponents from the rehearing of Initiative #95 does not deprive the

Board of jurisdiction to set the titles under C.R.S. § 1-40-106(4). The absence of Mr. Bows was for reasonable cause involving his attendance at an annual conference on public banking in Philadelphia. Mr. Staelin was able to adequately represent Mr. Bows in his absence. Mr. Staelin's comments on issue #94 were all accepted by the Title Board as applying to issue #95 after Mr. Staelin left to catch a plane. The statute does not provide a consequence for noncompliance, and the title had already been set. Other than changes in word order for clarity, the only change of substance that was made in the titles at the rehearing involved an identical change to each proposal that was proposed by and favorable to Petitioners, such that no prejudice was shown, nor any reason not to set title. The court should therefore defer to the decision of the Title Board.

Further, the recitals preceding the enacting clauses of the Initiatives did not deprive the Board of jurisdiction to set the titles. The Colorado Constitution, Art. V §1(8) and C.R.S. § 1-40-105(4) do not prohibit the use of such prefatory information.

After the Review and Comment hearing any changes made were not substantial or were in response to questions or comments by the Colorado Legislative Council and Office of Legislative Legal Services such that the Board

had jurisdiction to set titles under C.R.S. § 1-40-105(2). Further, the Court must grant "great deference" to the decisions of the Title Board in setting title.

The Initiatives each confine themselves to a single subject such that the Board properly set the titles for the Initiatives. The Initiatives disclose major provisions of the measures and are not otherwise vague and misleading such that the Board properly set titles for the Initiatives.

ARGUMENT

A. The Board was not deprived of jurisdiction although one of the Proponents was not present for the rehearing, and the other Proponent was not present for part of the rehearing.

1. Standard Of Review

Proponents agree generally with the standard of review as stated by Childears, but do not agree that the issue should be heard de novo because case precedent of this Court requires that the Court should grant great deference to the decisions of the Title Board ("Board") in setting title. In Re Ballot Title, (Petitions), 907 P.2d 586, 590 (Colo. 1995). Proponents agree that Childears preserved this issue.

2. For this issue Proponents adopt and incorporate here their response presented in their Answer Brief to Barbara M.A. Walker herein filed this date.

B. The Title Board had jurisdiction to set titles for the Initiatives under Article V, § 1(8) of the Colorado Constitution and C.R.S. § 1-40-105(4) even though both Initiatives contained "whereas" clauses above the "be it enacted" clause.

1. Standard Of Review

Proponents disagree with the standard of review as stated by Childears. The case cited by Childears, In re Ballot Title, 1997-1998 #109, 962 P.2d 252 (Colo. 1998) does not use the term "jurisdiction", and does not apply to this case because in that case the Title Board refused to set title and the Supreme Court affirmed. The standard of review requires that the Court "allow the greatest possible exercise of this valuable right". City of Glendale v. Buchanan, 578 P. 2d 221, 224 (Colo. 1978), and to "engage in all legitimate presumptions in favor of the propriety of the Board's actions" In re Ballot Title (Petitions), 907 P.2d 586, 590 (Colo. 1995). Proponents agree that Childears preserved this issue.

2. Proponents adopt and incorporate here their response on this issue presented in their Answer Brief to Barbara M.A. Walker.

C. After the Review and Comment hearing, any changes Proponents made to the measures were not substantial or were in response to questions or comments by the Colorado Legislative Council and Office of Legislative Legal Services. Therefore, the Board properly set titles under C.R.S. § 1-40-105(2).

1. **Standard of Review**. Proponents do not agree with the standard of review proposed by Childears. As acknowledged by Objector Walker, courts must liberally construe statutes governing initiatives to "allow the greatest possible exercise of this valuable right", City of Glendale v. Buchanan, 578 P. 2d 221, 224 (Colo. 1978). Proponents agree that Childears preserved this issue.

2. The addition of the words "or at no interest" was not a substantial change and was done after consulting with the Colorado Legislative Council and Office of Legislative Legal Services ("Council").

Proponents added the words "at no interest" following the words "may lend at interest" early in the first paragraph following the enacting clause of each initiative. As explained at the rehearing such change was not substantial because the original wording set no lower limit for "interest". Therefore, the bank could set interest at 0.0000000001% or less. Depending upon the amount of the loan, no interest might actually be owed for a loan over 15 to 30 years. Accordingly, adding the language "or at no interest" is not a substantial change, and makes the provision more clear in compliance with the "clear and coherent" requirement for the drafting of initiatives. C.R.S. §1-40-105(1). In addition, Proponents briefly discussed this proposed addition with the hearing representatives immediately after the formal end of the legislative council hearing on April 6, 2012 and the attorney representative indicated he did not find the change objectionable.

3. Proponents made no substantial changes related to the authority of the proposed banks except in response to a question or comment from the Council.

(1) The addition of the words "expanded or". The relevant sentence in paragraph 1 of initiative #94 to which Childears refers reads as follows:

> Any such bank shall have the same powers and authority of other banks chartered by the State of Colorado, as well as the power and authority to deposit public revenues and funds in its own bank, except as expanded or limited by the General Assembly (added words underlined).

Such change was not substantial because in the context in which the word "limited" was used its meaning was ambiguous. In Webster's Third New International Dictionary the first definition of the word "limit" as a verb is:

> to assign to or within certain limits: fix, constitute, or appoint definitely: ALLOT, PRESCRIBE … now used chiefly in legal terms (Merriam Webster's Third New International Dictionary, unabridged, 1961, 1993). (Exhibit A)

Further, the preceding part of the sentence in question reflects the intent to give the banks of political subdivisions the same powers as state chartered private banks in Colorado. By law, Proponents understand that the General Assembly can always either expand powers the powers of state-chartered banks in Colorado or restrict them further. Without the addition of the words "expanded or" the banks of all political subdivisions could be treated differently from all private state banks if legislation were to expand the powers of private banks in Colorado. Therefore, the

addition of the language "expanded or" removes the ambiguity from the word "limited", makes the meaning of the provision clear, and also makes the provision consistent with the stated intention to treat the political subdivision banks the same as private state-chartered banks.

In addition, Proponents sent an updated draft of the measure to the Council with the words "expanded or" in it late on the afternoon of April 5, 2012, and the updated draft was passed out to the hearing panel and available to Objectors at the hearing. The Council raised no objection to the change.

The reason for the substitution of the words "General Assembly" for the words: "purpose of the government of the political subdivision" in Initiative #94, which Mr. Staelin could not at the moment during the rehearing was that state chartered banks are controlled by the General Assembly, and so the change constituted a correction to reflect reality and the phrase that was removed had not provided helpful information.

The addition of the provisions of section 2(a)-(f) of Initiative #94 involving "Regulatory Oversight" was in response to the Council's Memorandum, where it asks: "Do the proponents intend for there to be any regulatory oversight over banks created under the proposed initiative? (Childears Exhibit 4, pp. 7-8, paragraph 9)

D. The Initiatives contain subjects each of which bears a necessary and proper connection to the others and to the purpose of the measures. The Title Board properly approved the Initiatives under Colorado's single-subject requirement.

1. **Standard of Review.** Proponents disagree that the standard of review is *de novo*. In the case, In re Ballot Title, 2011-2012 #3, 274 P.3d 562 (Colo. 2012), the Court stated:

> When reviewing a challenge to a single subject decision of the Ballot Title Setting Board, the Supreme Court employs all legitimate presumptions in favor of the propriety of the Board's actions. West's C.R.S.A. Const. Art. 5, § 1(5.5). *In re Title, Ballot Title, Submission Clause for 2009–2010 No. 45,* 234 P.3d 642, 645 (Colo.2010). We will only overturn the Title Board's finding that an initiative contains a single subject in a clear case. *In re Title, Ballot Title and Submission Clause, and Summary Pertaining to the Casino Gaming Initiative Adopted on April 21, 1982,* 649 P.2d 303, 306 (Colo.1982).

Proponents agree that Childears preserved his claim on this issue.

2. Proponents submit that each initiative deals with a single subject: Initiative #94 to authorize political subdivisions of the state to establish their own banks, and Initiative #95 to establish a state-owned and operated bank. Every provision of each initiative is closely connected to and consistent with the purpose of establishing or authorizing such bank(s), respectively, and providing for their proper operation and oversight, for the underlying purpose of restoring a healthy economy in Colorado. The proposal is based upon the model of the Bank of North Dakota, the only state-owned bank in the United States. As indicated by the

recitals at the beginning of each initiative, North Dakota is the only state with a healthy economy, with low unemployment (3.3%), large annual budget surpluses rather than the deficits affecting every other state, and sufficient prosperity to substantially reduce taxes, which Proponents submit is largely due to the operation of the bank. (See "whereas" clauses of the Initiatives for additional such information).

Childears claims that Petitioners highlighted three additional purposes of the Initiatives: (1) to amend Article X of the Colorado Constitution to allow political subdivisions to engage in multi-year obligations; (2) to void the Public Deposit Protection Act, which establishes protections for public funds deposited in private institutions; and (3) to amend the prohibition in Article XI of the Colorado Constitution which prohibits certain political subdivisions from pledging their credit. None of these claims highlights a breach of the single issue provision.

The primary function of such banks, like most banks, would be to lend money, not to borrow it. The obligations would be undertaken by the borrowers, not by the bank. Therefore, this provision would not be breached.

Likewise, the Public Deposit Protection Act would not be voided. Rather it would not be necessary as the banks of the state and political subdivisions would now place such funds in their own banks, or if they are too small to meet the

requirements to form a bank, they might still place such funds in a private bank, and still make use of the Act, or place them in a bank operated by another political subdivision.

Finally, there would be no need to amend Article X of the Colorado Constitution, which prohibits certain political subdivisions from pledging their credit because the banks of political subdivisions would be lending money, not pledging their credit. It would be the borrowers who would be pledging their credit.

In order to have the bank function as a bank, and earn money for its citizens and taxpayers for their benefit and for the benefit of Colorado's economy, there are circumstances in which the new Constitutional provisions will supersede existing Constitutional provisions, as provided by the appropriate superseding clause in each Initiative. However, that does not require the repeal of any Constitutional provision. Every provision in each measure merely ensures that the bank will operate as a bank and be able to fulfill its purpose as a bank for the benefit of taxpayers.

Childears next asserts that nothing in Initiative #94 would prevent the bank of a political subdivision from accepting the deposits of private individuals, corporations, or other non-government entities, nor from lending to itself. These

are mere possibilities, subject to decisions of the governing bodies including the General Assembly and the banks' boards themselves. None of them contravenes the single issue requirement.

Childears next asserts that it would contravene TABOR for the bank to retain earnings made on its deposits. A bank's ability to retain earnings is basic to its functioning as a bank. It would defeat the purpose of having a state or political subdivision-owned bank if it were not able to retain its earnings. Thus, it is necessary to supersede TABOR to that extent, but not to repeal it. The primary thrust of TABOR was to place restrictions on revenue of the state or political subdivision that must be extracted from taxpayers. The Initiatives do just the opposite: they enable taxpayers, through the bank, to earn substantial income on the taxes they have already paid to the political unit. This income may actually facilitate significant reductions in taxes, as has occurred in North Dakota in recent years while avoiding budget deficits (see "whereas" clauses of Initiatives #94 and #95). In any event, providing that such income shall not be limited is necessary for the bank to properly function as a bank.

Childears make several other arguments that are without merit. Because Mr. Childears is the Executive Director of the Colorado Banking Association, we might ask if the association might be more concerned with their members own

potential loss of income by having taxpayers' funds placed in banks owned by the political unit for the taxpayers' own benefit. As Mr. Bows pointed out, the Bank of North Dakota achieved a 19% return on its funds in its last fiscal year of 2010, much higher than the highest return than might at best be obtained through a private bank of about 3.5%. (Childears Exh. 2, 4-18-12, p. 24, ll. 13-16).

Childears' "single issue" arguments on Initiative #94 are essentially the same as his arguments on Initiative #95. Proponents' response is the same as to Initiative #95. If Initiatives #94 and #95 did not supersede TABOR with regard to the amount of income, the proposed banks would cease to function as banks. No private bank opens business and declares that it will limit its earnings to a prescribed amount. Thus, superseding TABOR on retention of income and expenses is essential in order for the proposed banks to function as banks. The Initiatives are written so that the newly established banks can function in a manner similar to and in cooperation with private banks. Thus, the single issue requirement is met by these provisions.

E. The Initiatives adequately disclose major provisions of the measures and are not vague and misleading The Title Board properly set ballot titles for the Initiatives.

1. **Standard of Review.** Proponents agree with the specific language presented by Childears on this issue, and that he preserved the issue. However,

Childears fails to state that in applying that standard the Court must engage "all legitimate presumptions in favor of the propriety of the Board's actions." In Re Ballot Title, Proposed Petition for an Amendment to the Constitution of State of Colo. (Petitions), 907 P.2d 586, 590 (Colo. 1995). In the case, In re Ballot Title for 2005-2006 #73, 135 P.3d 736, 740 (Colo. 2006), the Supreme Court stated:

> We have recently reviewed our case law with respect to fair, clear and accurate titles. *In re Ballot Title for 2005–06 #75*, No. 06SA63, 138 P.3d 267, 270–71, 2006 WL 1379609 (Colo. May 22, 2006). In short, the titles must be fair, clear, accurate, and complete, but they need not set out every detail of the initiative. *Id.* In addition, we review the titles set by the Title Board with great deference, and will only reverse the Board's decision if the titles are insufficient, unfair, or misleading. *In re Ballot Title for 1999–2000 # 256,* 12 P.3d 246, 254 (Colo.2000).

Proponents agree that Childears has preserved the issue.

2. Initiative #94. Childears urges that the Board erred in setting a title that does not disclose that the Public Deposit Protection Act will not protect public funds in the new banks because the Act only protects funds placed in private banks. Proponents submit that the Board's decision on this issue should be respected. First, such protection might be needed for public funds placed in private banks because such banks are authorized to and do engage in risky investments without public oversight or control, whereas the public banks will not be authorized to engage in risky investments and they will be subject to public control

and oversight. As Proponents pointed out, if deemed necessary a bank of a political subdivision can purchase private insurance to protect its deposits in its own bank. Such deposits can also be self-insured. As Mr. Bows stated at the hearing on April 18, 2012:

> As Earl mentioned earlier, you know, North Dakota hasn't had any bank failures in ten years. It has the highest number of community and independent banks per capita of any place in the United States, that type of thing. So actually, the North Dakota Bankers Association endorses the Bank of North Dakota. (Hearing, April 18, 2012, p. 32, lines 8-14)

Childears also claims the Title is misleading because it does not disclose that the authority of the bank, like that of other private stated-chartered banks, may be expanded or limited by the General Assembly, and that it does not disclose other powers that such banks might have. These minor and speculative points go far beyond what is required to make a title clear and not misleading and should be rejected. Further, even though it is unlikely the proposed banks would exercise such powers, these points, if they are a concern to anyone, would appear to be concerns of private banks such as Mr. Childears represents rather than of the average citizen, and the banks are already aware of these possibilities.

Initiative #95. Childears makes the same claims in regard to Initiative #95 on this issue that he made immediately above as to Initiative #94. Proponents incorporate their above response regarding Initiative #94 on this issue for Initiative

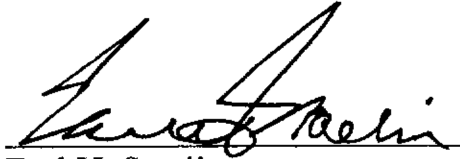
#95. In addition, Childears incorrectly states that the bank would be prohibited from taking deposits from public corporations. The relevant language of Initiative #95 states: "the bank will not take deposits of individual citizens, corporations, and other private legal entities" (Initiative #95, paragraph 1). Although the clause could be more clearly worded, the context shows that the word "private" modifies "corporations". Thus, the provision does not prohibit deposits from public banks, and the Title accurately reflects that fact.

CONCLUSION

For the foregoing reasons, Proponents respectfully request that pursuant to C.R.S. § 1-40-107(2) the court affirm the Title Board's denial of the Motions for Rehearing and find that the Title Board had jurisdiction to hear these measures and set titles for the Initiatives. Proponents further request that the court affirm the Title Board's findings that each Initiative contains a single subject and that the titles set by the board are not misleading or vague.

Dated: May 29, 2012

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on May 29, 2012, a true and correct copy of this ANSWER BRIEF OF PROPONENTS TO DON CHILDEARS was delivered via overnight delivery service to the following:

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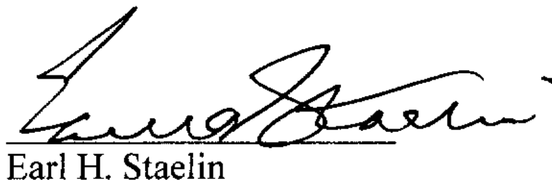

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