

SUPREME COURT, STATE OF COLORADO
Colorado State Judicial Building
2 East 14th Avenue
Denver, Colorado 80203

Original Proceeding Pursuant to C.R.S. 1-40-107(2)
Appeal from Colorado Title Setting Board

IN THE MATTER OF THE TITLE AND BALLOT AND
SUBMISSION CLAUSE FOR INITIATIVE 2015-2016
#107

PETITIONERS:
LUIS A. CORCHADO and
JASON LEGG

vs.

RESPONDENTS:
KATHLEEN CURRY AND FRANK MCNULTY

And

Title Board: SUZANNE STAIERT; SHARON
EUBANK; AND FREDERICK R. YARGER

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Case Number:
2016SA125

PETITIONERS' OPENING BRIEF

CERTIFICATE OF COMPLIANCE

I hereby certify that this brief complies with all requirements of C.A.R. 28 or C.A.R. 28.1, and C.A.R. 32, including all formatting requirements set forth in these rules. Specifically, the undersigned certifies that:

The brief complies with the applicable word limits set forth in C.A.R. 28(g) or C.A.R. 28.1(g).

It contains 4,100 words (principal brief does not exceed 9,500 words; reply brief does not exceed 5,700 words).

The brief complies with the standard of review requirements set forth in C.A.R. 28(a)(7)(A) and/or C.A.R. 28(b).

For each issue raised by the appellant, the brief contains under a separate heading before the discussion of the issue, a concise statement: (1) of the applicable standard of appellate review with citation to authority; and (2) whether the issue was preserved, and, if preserved, the precise location in the record where the issue was raised and where the court ruled, not to an entire document.

I acknowledge that my brief may be stricken if it fails to comply with any of the requirements of C.A.R. 28 or 28.1, and C.A.R. 32.

s/ Jason Legg _____
Luis A. Corchado
Jason Legg
PETITIONERS

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Luis A. Corchado and Jason Legg (“Petitioners”), registered electors of the State of Colorado, hereby file their opening brief supporting their petition for review the title, ballot title, and submission clause (collectively the “Title”) set forth in Initiative 2015-2016 #107.

STATEMENT OF ISSUES PRESENTED FOR REVIEW

A. Whether Initiative #107 violates the single-subject requirement where it fundamentally revamps the well-established Colorado Reapportionment Commission, created to solve the “endless battles” of “partisan politics” over state legislative reapportionment, and also establishes a new constitutional process for the independent federal redistricting process?

B. Whether Initiative #107 violates the Colorado Constitution by concealing its purpose to fundamentally revamp the Colorado Reapportionment Commission under the misleading guise of “competitive” redistricting and returning it to the partisan politics that existed before the 1974 constitutional amendment.

STATEMENT OF THE CASE AND FACTS

Statement of the Case

Apparently dissatisfied with (1) the Colorado Reapportionment Commission (or the “CRC”) process for state legislative redistricting¹ and (2) the separate state legislative process for congressional redistricting, the Proponents filed Initiative #107 to change both processes in one “yes” or “no” vote. The Initiative #107 amends Article V of the Colorado Constitution by adding Sections 43.5 (anti-gerrymandering statement), Section 47.5 (criteria for congressional districts), and amending Sections 44 (congressional representatives), 47 (criteria for state legislative districts) and 48 (restructuring the CRC). As explained in more detail below, Initiative #107 proposes fundamental changes to the CRC process like eliminating the guaranty that all three branches of Colorado government now have in the CRC appointment process² and concentrating all the appointment power into the hands of the two major political parties, even for the appointments reserved for

¹ The Petitioners do not intend to suggest that revamping both the CRC itself and the CRC process is one subject. Petitioners see no need to raise that objection at this time as it is sufficient to focus on the unconstitutional combination of fundamentally revamping an existing reapportionment process with the creation of a new federal redistricting process.

² Initiative #107 completely eliminates the Supreme Court’s role in the appointment process. The Governor or Lt. Governor or both will have a role in the appointment process so long as they are candidates of one of the major political parties. See Initiative #107, Sec. 48.

minor political parties and/or unaffiliated voters. Fearing that the majority of voters may not see the CRC process as broken and needing fixing, the Proponents tacked on a more attractive purpose of creating a commission for redistricting congressional districts. To vote “yes” to create a federal redistricting commission, voters will be forced to vote “yes” to fundamentally altering the functional CRC and CRC process. As discussed below, this tying arrangement violates the Colorado Constitution.

In addition, the Title to Initiative #107 misleads the public by referring to the fundamental changes to the CRC as “renaming” it, as though the “renaming” is a minor byproduct and formality of combining the federal redistricting responsibilities with the CRC’s separate responsibility for state legislative redistricting. Aside from the multiple purposes of Initiative #107, the title and ballot question should clearly disclose that Initiative #107 proposes fundamental changes for the CRC and the CRC process rather than merely saying that the CRC will be “renamed.”

Despite the multiple purposes in Initiative #107, the Title Setting Board approved the Title for Initiative #107 on March 16, 2016. Petitioners appeared at that hearing and separately testified that Initiative #107 violated the Colorado Constitution’s single-subject requirement and that the proposed Title was

misleading in many respects. The Title Setting Board quickly dismissed the Petitioners objections and moved on to work with Proponents to set the title and submission clause.

On March 23, 2016, Petitioners filed a timely motion for rehearing more fully addressing the single-subject violation and the misleading language of Initiative #107. See Petition, Appendix, p. 51 of 65. The Title Board again quickly dispensed with Petitioners' objections, denied their request for rehearing and finalized the ballot title and submission clause. See Petition, Appendix, p. 65 of 65.

Statement of the Facts

A snapshot view of the creation, present structure and track record of the CRC demonstrates that fundamentally amending the CRC constitutes one distinct purpose of Initiative #107. In 1974, citizens drafted and passed Amendment 9 that created the CRC to “[r]emove from the General Assembly the power to reapportion itself...” for the one hundred state legislative districts. *Legislative Council's Analysis of 1974 Ballot Proposals*, Research Publication No. 206 at 26. Aside from creating the independent CRC to “reduce the impact of partisan politics,” Amendment 9 also required that all three branches of state government appoint the eleven members of the CRC. *In re Colorado General Assembly*, 828

P.2d 185, 211 (Colo. 1992). All the chairpersons for the CRC have come from the Colorado Supreme Court appointees (Robert E. Lee in 1981; Chancellor Dan Ritchie in 1991, Rosemary Rodriguez in 2001, and Mario Carrera in 2011). For each of the last four census cycles since 1974, the CRC has successfully achieved its objective of creating a new reapportionment plan ultimately approved by the Court.

Following the creation of the CRC in 1974, the federal redistricting process for seven districts³ continued on a separate, less successful track and fixing that process necessarily constitutes a second purpose of Initiative #107. No commission exists for the federal redistricting process. The General Assembly redraws the lines for the seven congressional districts through the bill-making process during legislative sessions. Colo. Const., Art. V, Sec. 44. In stark contrast to the CRC's track record since 1974, the General Assembly failed four consecutive times to successfully pass legislation for a new federal redistricting plan without one or more parties invoking the equity powers of the state or federal court, leading to a court-adopted plan in three of those four instances⁴ and a

³ Congress apportioned a sixth congressional seat to Colorado after the 1980 census and a seventh seat after the 2001 census.

⁴ See *Carstens v. Lamm*, 543 F. Supp. 68 (D. Colo. 1982); *Avalos v. Davidson*, 42 P.3d 642 (Colo. 2002); *Hall v. Moreno*, 270 P.3d 961 (Colo. 2012).

compromise plan induced by a court-appointed special master in the other instance.⁵ In 2003, again in stark contrast to the CRC process, the General Assembly and Governor enacted a new federal redistricting plan that was introduced, passed by the State senate and house, and signed all in the last three days) of the legislative session to replace the 2002 court-ordered plan.⁶ This led to more litigation in both state and federal court that ultimately declared the 2003 General Assembly plan unconstitutional. See, e.g., *Salazar v. Davidson*, 79 P.3d 1221 (Colo. 2003).

Initiative #107 proposes at least five fundamental changes to the successful CRC process created by the citizens' initiated Amendment 9 in 1974. First, it completely eliminates the Judicial branch from the appointment process, which had been the source for the chairperson of every single CRC. See Sec. 48 (strikeout). Second, Initiative #107 eliminates the guaranty that the executive branch will

⁵ In 1991, the Governor and General Assembly could not reach agreement leading to federal court litigation (complaint 91CV1972 filed 11/12/91; complaint 91CV2129 filed 12/4/91; Hispanic League complaint 91CV2162, 12/10/91) that ended when the court's special master convinced the Governor and General Assembly to compromise and adopt a new plan (signed 3/24/92).

⁶ This history is part of the legislative record of SB 03-0352 but was also reported in the news. See <http://archive.fairvote.org/redistricting/reports/remanual/conews.htm#battle> ("Battle flares anew as Dems file suit over redistricting," D. Post 5/10/03).

appoint three of the eleven commissioners. Initiative #107, Art. V, Sec. 48(1)(b) The Governor and/or Lt. Governor will have an opportunity to appoint commissioners only if they win the election as candidates for one of the two major parties in Colorado. Initiative #107, Art. V, Sec. 48(1)(c)(I)(A) – (C). If the Governor and Lt. Governor belong to the same party (most likely the case), then the executive branch will appoint only two of the twelve commissioners instead of three commissioners in the current CRC process. Third, assuming the two major political parties will continue to control the top four leadership positions of the state legislature, the initiative concentrates all the appointment power into the hands of the two major political parties and restores the dueling partisan politics that instigated the 1974 amendments. Fourth, under Initiative #107, unaffiliated voters and voters belonging to minor parties need the permission of the two major parties to secure an appointment and no longer have the ability to seek appointment through the apolitical State Judiciary branch. Fifth, Initiative #107 changes the commission membership from eleven to twelve votes thereby creating the possibility of a stalemate that does not currently exist. The point of highlighting these particular changes is not to focus on the merits but to point out that each is significant and rise to the level of a “purpose” or multiple purposes of the

Initiative, not merely minor housekeeping changes. In addition, this is not an exhaustive list but only some of the most fundamental changes to the CRC.

For the federal redistricting process, the obvious fundamental change is transferring the General Assembly's constitutional power to a 12-member commission and creating a more predictable and concrete process. It is important to note that there are four pending initiatives that change either the CRC process or federal redistricting process without combining the two processes into one initiative (#38, 128, 132, 133).

SUMMARY OF THE ARGUMENT

Initiative #107 violates the Colorado Constitution in two ways, each requiring that the Title be rejected and returned to the Title Setting Board. First, it contains at least two independent subjects and thereby violates the single-subject requirement. Initiative #107 fundamentally *revamps* the well-established and functional Colorado Reapportionment Commission overseeing state legislative reapportionment and also *creates* a new commission process to remedy the less successful federal redistricting process. The historical background to the CRC vividly demonstrates how it was created apart from the federal redistricting process and successfully operated now for 40 years. The same historical background demonstrates the independent nature of Congressional redistricting and the very

separate paths it has taken for the last 4 census cycles. The process for redrawing state legislative districts for State representatives and senators does not depend on or affect the redrawing of federal congressional lines for U.S. Representatives. Pending initiatives highlight that these processes can be addressed independently.

Second from the separate subjects, the Title to Initiative #107 is unconstitutionally misleading because it disguises that it fundamentally restructures the CRC. Despite the consolidation of appointment power into the hands of the two major political parties and creating the possibility of stalemates that previously did not exist, among other significant changes, the title misleads the public by saying that the Initiative merely “renames” the CRC rather disclosing that it fundamentally “restructures” it.

STANDARD OF REVIEW

The Court has de novo authority to decipher the holdings in its own precedent and owes no deference to the Title Board’s interpretation. *In Re Ballot Title #219*, 999 P.2d 819, 821(Colo. 2000). Some deference is due to the Title Board’s interpretation of the Initiative’s purposes and the drafting of the title, ballot title and submission clause. *In re Title, Ballot Title and Submission Clause for 2013-2014 #90*, 328 P.3d 155, 162 (Colo. 2014). Ultimately, the Court

balances the important goals of the single-subject prohibition with the fundamental importance of the initiative process.

ARGUMENT

I. Initiative #107 violates the single subject requirement of Colorado Const. Article V, Section 1(5.5) because it seeks to affect two different political processes pertaining to two wholly separate groups of political offices.

A. The Court has previously determined that amending an existing political process and/or commission while creating a new process for different political offices constitutes multiple purposes.

In *In the Matter of the Title, Ballot Title, and Submission Clause For 2013-2014 #76*, 333 P.3d 76 (Colo. 2014) this Court has already determined that revamping an existing process affecting one set of political offices stands alone and separate from creating a new constitutional process for another set of political offices. The Court held that Initiative #76 was unconstitutional as it addressed at least two different subjects: (1) revamping an existing recall process for elected officials and (2) establishing a new recall process for non-elected state and local officers. It began its analysis by first noting the important point that Article XXI, the targeted provision of Initiative #76, only applied to elected officials. *Id.* at 79-81. Consequently, the “process changes” in Initiative #76 for recall elections

necessarily affected the existing recall process for elected officials. The Court recognized that some voters might favor altering the recall process but not favor establishing a new constitutional right to recall non-elected officers, or vice-versa. It held that this effort to “roll” two subjects into one Initiative “to attract the votes of various factions” constituted the type of surreptitious practice that the single subject requirement seeks to proscribe. *Id.* at 84. See also *In Re Proposed Initiative for 2005-2006 #55*, 138 P. 3d 273, 282 (Colo. 2006). The “process changes” to the recall of elected officials was “not dependent” or “necessarily” connected to the “substantive” changes of adding non-elected officials to the recall process. *Id.* at 86. Nor could the proponents of Initiative #76 merge these two subjects “with a single all-encompassing umbrella phrase (‘concerning the recall of government officers’)...” *Id.* at 86. The recall process of elected officials was an independent subject from the recall process of appointed officials, just legislative redistricting for state representatives differs from federal redistricting for U.S. representatives.

B. Initiative #107 affects multiple purposes because it amends an existing political process and commission for state representative districts and creates a new commission process for federal representative districts.

Initiative #107 in this case suffers from essentially the same infirmities found in the 2014 Initiative #76 stricken by the Court as unconstitutional

initiatives. Just like the 2014 Initiative #76, the 2015 Initiative #107 advances the two purposes of “revamping” an existing CRC and CRC process for state representatives and establishing a new process for U.S. Congresspersons. Given this Court’s precedent discussing the CRC, the proposed changes to the CRC cannot be discounted as minor or incidental. This Court has previously recognized the creation of the Reapportionment Commission as a “major change” in 1974 that sought “to reduce the impact that partisan politics can have on the drawing of legislative district boundaries, through the placement of the commission outside the legislative branch and through the requirements for appointment of commission members *by all three branches of state government.*” *In re Colorado General Assembly*, 828 P.2d 185, 211 (Colo. 1992)(emphasis added). The Court recognized that a “major motivation” for the 1974 Amendment was “the General Assembly’s reapportionment track record, which was prone ‘to endless battles over redistricting and to enmity among state lawmakers.’” *Id.* In light of this history, the Initiative #107 amendments to return all the appointment power to the hands of the two major parties and elimination of the Court’s appointment power must then be seen as a significant purpose. Adding to the significance of the Initiative #107 changes to the CRC, the two parties will also control which minor party and unaffiliated voters will fill the last four of the twelve commission seats. Again,

regardless of whether these are wise changes, they are significant change and constitute discreet purposes of Initiative #107. The proposed change that drives the last significant nail in the CRC's coffin is changing the membership to an even number so that a stalemate will now be possible. See Section 48(1)(a). It is likely that many voters might oppose this part of the Initiative if it was properly presented as a single subject in its own Initiative instead of tying it to the creation of a federal redistricting commission.

For the same reasons the Court recognized the “major change” of transferring the General Assembly's state reapportionment power to the CRC in 1974, it seems it should also recognize the “major change” of transferring the General Assembly's power of federal redistricting to a commission. Arguably, the transfer of federal redistricting power is even more “major” given that the state's power over federal redistricting flows first from the federal constitution (U.S. Const., Art I, section 4) and secondarily from the Colorado constitution. Only last year did the U.S. Supreme Court expressly announce that the U.S. Constitution permitted states to vest independent commissions with final authority over federal redistricting. See *Arizona State Legislature v. Arizona Independent Redistricting*, 135 S.Ct. 2652 (2015). Stated more poignantly, improving the broken ad hoc federal redistricting process is a completely separate subject from breaking the

existing and functional CRC. And again, the voters that might vote “yes” for the proposal related to federal redistricting may want to vote “no” to fundamentally changing the existing CRC. The single subject requirement of article V, section 1(5.5), of the Colorado Constitution prohibits such attempts to roll together these multiple subjects in order to attract the votes of various factions that might favor one of the subjects and otherwise oppose the other. See *In re Proposed Initiative for 2005–2006 # 74*, 136 P.3d 237, 242 (Colo.2006).

Furthermore, state legislative redistricting and federal redistricting do not depend on or affect each other. There is no reason the first subject of altering the existing CRC cannot be addressed separately from establishing a new process for congressional redistricting. For example, the Title Board approved Initiative #38 in December 2015, an initiative that also proposes to add the power of federal redistricting to the CRC without including the separate purposes of changing the composition of the CRC or the CRC process.⁷ While they are very different Initiatives, the Title in Initiative #107 looks similar enough to the Title in Initiative #38 that voters may easily be misled as to the fundamental differences. Other initiatives currently in the ballot initiative process also demonstrate that changes to

⁷ See <http://www.sos.state.co.us/pubs/elections/Initiatives/titleBoard/results/2015-2016/38Results.html>.

the CRC process can be advanced separately from the creation of a federal redistricting commission. See #128, #132, and #133.⁸ For these preceding reasons, Initiative #107 fails to satisfy the single-subject requirement delineated in Section 1 (5.5) of Article V of the Colorado Constitution.

II. The Title for Initiative #170 is misleading and unconstitutional by failing to expressly state that Initiative #107 fundamentally restructures the CRC rather than saying that it merely “renames” it.

The title, ballot title and submission clause of a ballot measure should enable the electorate, whether familiar or unfamiliar with the subject matter of a particular proposal, to determine intelligently whether to support or oppose such a proposal. *In re Title, Ballot & Submission Clause for 2009-2010 No. 45*, 234 P. 3d 642, 648 (Colo. 2010). The Title to Initiative #107 fails to do so in this case. Describing the commission as simply “renamed” rather than words like “replacing” and/or “changing” the existing CRC impermissibly misleads voters and hides the independent purpose of altering the CRC that has achieved its mission of creating a new state legislative redistricting plan after each census. On this point, the Title Board actually deleted the word “changing” that was included in the original proposed title and submission clause. The title and submission clause set by the

⁸ See <http://www.sos.state.co.us/pubs/elections/Initiatives/titleBoard/index.html>.

Title Board gives the false impression that the CRC has not otherwise been changed and disguises many of the fundamental changes to the CRC referenced above thereby (1) preventing the voters from detecting the changes and (2) appealing to many voters' desire to fix the federal redistricting process (without breaking a functional system).

To comply with the single subject requirements in the Colorado Constitution and implementing statutes, the title and submission question should alert the voter that appointment power will be transferred from the Executive and Judiciary branches to the two major parties (Section 48(1)(a)). The voters must be informed that Initiative #107 changes the Commission membership from an odd number to an even number (Section 48(1)(a)) to allow for the possibility of a stalemate by an even vote. They must be informed that the leadership of the two major parties will appoint all the commissioners, the first eight commission members from their "own party" and the last four following an application process. See Section 48(1)(b). The title and submission clause do not inform the voters that unaffiliated voters no longer will have the ability to appeal to an apolitical government body to be appointed to the CRC but will have to garner permission from the two major parties. The Title must be clear enough so that voters can deliberately choose to change a functional CRC. Given the scope of the fundamental alterations to the

commission, the only accurate way to characterize the Initiative’s treatment of the existing reapportionment commission is to describe it as being “fundamentally restructured” or “repealed and replaced by the redistricting commission” that places all of the appointment power into two major parties. Without these disclosures in the Title, the Title undoubtedly will be misleading.

IV. RELIEF SOUGHT

The Petitioners request that the Court (1) find that Initiative #107 violates the Colorado Constitution because its purposes affect two independent subjects and it is fundamentally misleading and (2) return Initiative #107 to the Title Board to reduce the Initiative to one subject and ensure the Title clearly identifies the purposes of the statute.

Dated this 3rd day of May, 2016.

Respectfully submitted,

s/ Jason Legg
Luis A. Corchado
Jason Legg
PETITIONERS

CERTIFICATE OF SERVICE

I hereby affirm that a true and accurate copy of the Petitioners' Opening Brief was sent on this day, May 3, 2016 via ICCES electronic filing system to counsel for the Title Board and counsel for the proponents at:

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