

In the Matter of)
Elissa for DC) Docket No. OCF 2022-FI-006
)
Robert Price, Treasurer)
P.O. Box 552)
Washington, D.C. 20004)

**REQUEST FOR HEARING DE NOVO
UNDER 3 D.C. MUN. REGS. § 3709.11**

Petitioners Councilmember Elissa Silverman and Elissa for DC (Petitioners) submit this request for hearing de novo with the Board of Election, and state:

INTRODUCTION

Petitioners request an expedited hearing de novo regarding the Office of Campaign Finance’s (OCF) erroneous ruling. Since the inception of the allegations underlying this matter, Councilmember Silverman has been completely cooperative. During the investigative period, OCF agreed—in writing—to consider Councilmember Silverman’s response provided she send it within 90 days. OCF disregarded this written agreement, prejudiced Councilmember Silverman, and violated her right to due process. Although Petitioners request a hearing, this constitutional violation is so glaring that it warrants immediate vacatur. Petitioners thus request that the Board of Elections (Board) vacate and remand this matter to OCF for further proceedings.

Besides OCF’s due process violation, the reasoning underlying its order is unsupportable. Given that Councilmember Silverman is an at-large D.C. Councilmember up for reelection in the November 8, 2022 General Election, conducting a poll in *any* D.C. Ward would have been relevant and beneficial to her reelection so long as the poll was of D.C. voters. To find otherwise would preclude District-wide candidates that use Fair Election program (FEP) funds from conducting polls specific to any given Ward. Additionally, the circumstances of Petitioners’ Polls prove the results were particularly important to furthering Councilmember Silverman’s reelection. There is no evidence to the contrary given that OCF failed to investigate or interview any other candidate or person. The evidentiary asymmetry is unsurprising—because no such evidence exists. The uncontroverted evidence is that polling Ward 3 helped Petitioners understand Ward 3 voters’ priorities and informed Councilmember Silverman’s endorsement decision. If Councilmember Silverman endorsed a candidate that either did not win or was not aligned with her interests and priorities, the endorsement could have harmed her own electoral chances. In other words, polling Ward 3 was directly relevant to Councilmember Silverman’s campaign. OCF’s ruling is wrong and should be reversed.

BACKGROUND

I. Factual Background

Councilmember Silverman is an incumbent at-large D.C. Councilmember who is running for reelection in the 2022 General Election as an Independent candidate. Elissa for DC is

Councilmember Silverman’s designated candidate committee. This Request relates to two polls Petitioners commissioned on June 7, 2022, ahead of the Primary Election. The discussion below provides the necessary background on the polling and Petitioners’ use of the results, which was provided to OCF. (*See generally* **Exhibit 1.**)

A. Petitioners commissioned two Polls to support Councilmember Silverman’s reelection in the 2022 General Election.

In D.C. Council elections for at-large seats, voters may select up to two at-large candidates on their ballots. Given that D.C. has a large, Democratic constituency, this typically means that Democratic at-large candidates receive the most votes in each Ward. This has not been the case, however, in recent elections for Ward 3. Councilmember Silverman, who runs as an Independent candidate, has won the most votes in Ward 3, over her Democratic challenger, in each of the last two at-large election cycles. Thus, given that Ward 3 is an important electoral base delivering a sizeable number of votes for her re-election, it is imperative that Councilmember Silverman be well-informed of Ward 3 priorities.

The weekend before Memorial Day, Tricia Duncan and Ben Bergmann, both candidates in the Ward 3 Council Democratic Primary Election, contacted Councilmember Silverman and asked for her official endorsement. Given the importance of Ward 3 to Councilmember Silverman’s reelection, any Ward 3 endorsement required substantial vetting. If Councilmember Silverman endorsed a candidate that either did not win or was not aligned with her priorities, the endorsement would harm her electoral chances in the General Election.

In electoral politics, strong polling numbers and access to money in the closing weeks of the election generally translate to electoral success. In local Ward races in D.C., media outlets and civic organizations rarely conduct polling. The money advantage in the race was clear, however. Days after Duncan and Bergmann asked for her endorsement, the *Washington Post* published an article identifying an outside interest group—Democrats for Education Reform (DFER)—that was spending hundreds of thousands of dollars in the Ward 3 Council Democratic Primary Election supporting candidate Eric Goulet. DFER’s spending in Ward 3 was of importance to Councilmember Silverman for at least two reasons. *First*, in terms of fundraising for specific policies, DFER traditionally raises money from groups and constituents that are aligned with Councilmember Silverman’s opponents. *Second*, in the 2020 election, Councilmember Silverman supported a challenger to an incumbent D.C. Councilmember that DFER backed. In that same election, Councilmember Silverman was critical of DFER’s campaign literature, which drew public attention.

Thus, if DFER was spending money in Ward 3, it was not to align itself with Councilmember Silverman, her campaign, or the policies that she supports. Thus, when asked to endorse a Ward 3 candidate in the Primary Election, Councilmember Silverman not only needed to endorse a candidate that aligned with her politically, but also a candidate that had the best chance of defeating any DFER-backed candidate.

B. Petitioners conducted two targeted polls through Amplify, Inc. and TargetSmart Communications LLC.

To inform her endorsement, Councilmember Silverman, through Elissa for DC, commissioned two polls related to the Democratic Primary Election.

First, on June 7, 2022, Councilmember Silverman commissioned Amplify, Inc. to conduct a poll related to the Democratic Primary Election (the Amplify Poll). The Amplify Poll was conducted using an automated voter survey. The poll used automated dialing to deliver a pre-recorded survey to capture a snapshot of Ward 3 voter opinion. Respondents were asked to record their opinion to five questions by pressing numbers on their phone. The five questions asked, “If the election were held today, who would you support,” and proceeded to poll these elections: Mayor of D.C., Ward 3 Democratic Primary, Council at Large, Council Chair, and D.C. Attorney General. A script of the Amplify Poll was provided to OCF. Of the 12,333 voters dialed by Amplify’s system, only 64 completed the entire survey. Because of the low engagement with the survey, the margin for error was 12%. Amplify provided an Excel spreadsheet with the raw response data and survey report, which was provided to OCF.

Second, also on June 7, 2022, Councilmember Silverman commissioned TargetSmart Communications LLC to conduct a poll related to the Ward 3 Council Democratic Primary Election (the TargetSmart Poll). The TargetSmart Poll was conducted using live-caller representatives to survey Ward 3 voters. TargetSmart call-center representatives made 346 successful contacts with voters. TargetSmart call-center representatives contacted voters through a mix of landlines, cell phones, and text messages, and recorded each respondents’ answers to the questions. TargetSmart call-center representatives asked respondents a number of demographic, voter-frequency, and voter-opinion questions. Question number seven stated: “[I]f the June Democratic primary election for City Council in your district were held today, for whom would you vote?” TargetSmart’s survey report was disclosed to OCF.

The total cost of the Polls was \$6,277.52. The Amplify Poll cost \$1,277.52, and the TargetSmart Poll cost \$5,000. The invoice for each Poll was provided to OCF. Petitioners used funds from Councilmember Silverman’s Elissa for DC campaign account to pay for the Polls. The funds in this account include funds raised by the campaign prior to receiving funds through D.C.’s Fair Elections program (or FEP); FEP “base” funds received after qualifying for the ballot; and FEP funds after meeting the qualifying threshold of small-dollar donations from D.C. voters. Expenditures for each poll were listed in Councilmember Silverman’s June 10, 2022 campaign-finance report, which was filed with OCF.

C. Councilmember Silverman informed both Duncan and Bergmann that she could not endorse them in the Ward 3 Democratic Primary Election.

After reviewing the polling data, Councilmember Silverman called Duncan and Bergmann separately to inform each candidate that she could not endorse them in the Ward 3 Council Democratic Primary Election. After Councilmember Silverman informed Duncan and Bergmann that she would not endorse either candidate, they asked for Councilmember Silverman’s thoughts on Ward 3 primary topics. Councilmember Silverman’s responses were

tailored to the questions asked by each candidate. Specific to Duncan, Duncan asked Councilmember Silverman whether her candidacy might impact the election outcome. Councilmember Silverman told Duncan that vote splitting was a reality, and, if that concerned her, she needed to be comfortable staying in the race knowing that choice could help elect a candidate with whom she disagreed. Councilmember Silverman was clear, however, the choice to continue was Duncan's and she needed to do what she felt was right given the investment of herself, her family, and her friends. Contrary to inaccurate news reports, Councilmember Silverman never recommended that Duncan withdraw from the race. Councilmember Silverman advised Duncan that only Duncan could make that decision.

As to Bergmann, he asked Councilmember Silverman what she thought Duncan would do. Councilmember Silverman advised Bergmann that she discussed concerns over vote splitting with Duncan but did not know whether Duncan would continue her campaign. Like with Duncan, Councilmember Silverman did not recommend Bergmann withdraw from the race.

To be clear, Councilmember Silverman did *not* share the results of the Polls with Duncan or Bergmann. Rather, in her conversations with these candidates, Councilmember Silverman shared that Eric Goulet was leading and that Matt Frumin was his closest challenger. Councilmember Silverman discussed no other details of the Polls with Duncan or Bergmann, and expressly told both candidates she would not share the results of the Polls.

D. The results of the Polls directly benefited Councilmember Silverman's reelection campaign in measurable ways.

Councilmember Silverman commissioned the Polls for three reasons. *First*, and most critically, the Polls informed Councilmember Silverman's endorsement in Ward 3. Before polling, Councilmember Silverman had impressions of Ward 3 voter priorities based on her own campaigning and observations. Several candidates, including Duncan and Bergmann, had similar political platforms that aligned with Councilmember Silverman, so it was unclear to Councilmember Silverman which candidate of similar positions had the most voter support. Thus, polling the Ward 3 race allowed her to gain valuable electoral information on a decision that was critical to her own at-large race. *Second*, in selecting the right Ward 3 candidate to endorse, Councilmember Silverman also wanted to back the candidate with the best chance of defeating the DFER-backed candidate. This served Councilmember Silverman's own electoral interests because losing in Ward 3 would undermine DFER as a political influencer for the General Election in which Councilmember Silverman was a candidate. *Third*, Councilmember Silverman wanted to sample a less expensive, automated polling system before her General Election. Amplify offered a robust poll of five primary races in Ward 3 at a fraction of the cost of more traditional polling services. For example, TargetSmart would have charged up to \$25,000 for the five primary elections polled through Amplify, which charged just \$1,200. Thus, in conducting a poll with Amplify, Councilmember Silverman received the benefit of sampling a new low-cost polling service offering data in five primary elections which, in turn, allowed her to compare Amplify's low-cost model with more traditional polling agencies, and on races that mattered to her reelection campaign. At bottom, the Polls were conducted at Councilmember Silverman's sole direction and for her own electoral benefit.

II. Procedural Background

A. One of Councilmember Silverman’s challengers filed a complaint and request for investigation.

On August 23, 2022, Karim Marshall, an at-large candidate in the D.C. Council race, filed a complaint and request for investigation (Complaint) against Petitioners with OCF. (*See generally Exhibit 2.*) Marshall alleged Petitioners “conducted a telephonic push poll of Ward 3 voters,” and, “[a]mong the question asked[,] was a ranked preference poll regarding candidates in the race for the Ward 3 Councilmember.” (*Id.* ¶ 18.) Marshall further alleged that the “poll identified CANDIDATE A as the candidate with the best chance of” winning (*id.* ¶ 19), and that a June 14, 2022 news article had reported that Councilmember Silverman “discuss[ed] the results of the poll with undisclosed persons in Ward 3,” including “CANDIDATE B” (*id.* ¶ 20). Marshall also pointed out that CANDIDATE B and CANDIDATE C suspended their campaigns on June 13, 2022, and June 14, 2022, respectively. (*Id.* ¶¶ 22, 23.)

Based on this, Marshall claimed that “these discussions support an inference of impermissible coordination” and “an unauthorized in-kind contribution.” (*Id.* ¶¶ 21, 25.) Marshall requested that OCF “[i]ssue public guidance on the allowable use of polling data” and a “written admonition against [Petitioners], specifically identifying the improper behavior.” (*Id.* ¶¶ 28, 20.) Marshall also asked OCF to fine Petitioners. (*Id.* ¶ 31.)

B. Petitioners cooperated with OCF’s investigation.

Three days later, on August 26, 2022 (Friday), OCF, through General Counsel William SanFord, emailed Councilmember Silverman informing her that OCF had commenced an investigation based on the allegations and that she “may provide the responses [she] deem[ed] appropriate.” (**Exhibit 3** at 1.) On August 31, 2022 (Wednesday), counsel for Petitioner, Jason Downs, Esq., called Mr. SanFord, informed him that he represented Petitioners, and confirmed Petitioners’ intention to respond to the allegations. (**Exhibit 4** at 1–2, attach. 1 at 1.) Mr. Downs followed up in writing. (*Id.*) That same day, Mr. SanFord responded, “advis[ing] that OCF w[ould] be submitting questions” to Petitioners and that timely responses were “imperative to the fair adjudication of this matter.” (*Id.* attach. 2 at 1.) Mr. Downs informed Mr. SanFord that Petitioners intended to fully cooperate with the investigation.

On September 23, 2022, Mr. SanFord sent Petitioners 20 questions. As promised, Petitioners provided full responses to each of OCF’s questions on October 7, 2022. (*See Exhibit 1* at 1–9.) OCF did not ask for follow up.

C. OCF reneged, without explanation, on its promise to allow Councilmember Silverman time to respond to the Complaint.

Early in the investigation, Messrs. SanFord and Downs discussed the timing of OCF’s investigation. In fact, on their introductory call on August 31, 2022, Mr. Downs asked whether OCF planned to issue a decision before Councilmember Silverman responded to the allegations. (**Exhibit 4** at 1.) At that time, Mr. Downs noted that Councilmember Silverman could respond

by September 30, 2022, and asked OCF not to issue a decision before Councilmember Silverman responded. (*Id.*) Mr. SanFord agreed and stated OCF would not issue a ruling until Councilmember Silverman responded. Mr. SanFord went a step further and stated that, if Councilmember Silverman responded within the 90-day investigative window set forth in the D.C. Municipal Regulations (before November 21, 2022), OCF would not issue a ruling and would consider Councilmember Silverman’s response. (*Id.*)

During the August 31 call, Mr. SanFord also said he understood Councilmember Silverman was a candidate in an ongoing and active election, that Mr. SanFord wanted to give her ample time to respond, and that Mr. SanFord did not want to influence the upcoming election. (*Id.*) Mr. Downs assured Mr. SanFord that Councilmember Silverman would respond to the Complaint within the 90-day investigative period.

Mr. Downs memorialized the above conversation in an email to Mr. SanFord, which he confirmed in writing. Mr. Downs’s August 31 email read:

I’m confirming that my office represents Elissa Silverman and Elissa For DC. We will submit a response to the allegations related to OCF FI 2022-006. I understand from our discussion today that **OCF will not issue a decision until Ms. Silverman and Elissa for DC have a chance to respond in writing within the 90-day window** set forth in D.C. Mun. Regs. 3704.7. Please let me know if my understanding is incorrect. Otherwise, please accept this email as confirmation that **Ms. Silverman and Elissa For DC intend to respond in writing before the expiration of the 90-day timeframe set forth in D.C. Mun. Regs. 3704.7.**

(*Id.* at 2, attach. 1 at 1.) Mr. SanFord responded in confirmation:

Your understanding that the Office of Campaign Finance (OCF) will not issue a decision(order) regarding the above referenced investigation prior to receipt of a response from Ms. Silverman and the Elissa for DC Principal Campaign Committee **as long as the response is received within the 90 day investigative period prescribe by 3DCMR Section 3704.7 is correct.**

(*Id.* at 2, attach. 2 at 1.) Based on the assurances that Councilmember Silverman could submit her response within 90 days, she kept campaigning. (*Id.* at 2.)

Then, on September 28, for unknown reasons, Mr. SanFord reversed his prior position and denied the above exchange ever occurred. (*Id.*) He insisted that Councilmember Silverman must provide a response by no later than October 14. Mr. Downs asked Mr. SanFord to honor their original and express agreement regarding timing. (*Id.*)

What is particularly concerning is that Mr. SanFord denied the verifiable August 31 exchange ever occurred. (*Id.* at 2.) He claimed “at no point did I indicate to you that the a [*sic*] respondent in an investigation could wait 90 days to submit responses to allegation [*sic*] in a complaint” (*id.*), despite stating “that the Office of Campaign Finance (OCF) will not issue a decision(order) regarding the above referenced investigation prior to receipt of a response from

Ms. Silverman and the Elissa for DC Principal Campaign Committee **as long as the response is received within the 90 day investigative period prescribe by 3DCMR Section 3704.7**” (*id.* at 2, attach. 2 at 1). This denial is either a deliberate misstatement or a reckless and repeated disregard for the truth. Under either scenario, OCF changed its position.

Mr. Downs noted that the changed position prejudiced Councilmember Silverman and explained that, if OCF issued an adverse order before Petitioners had an opportunity to respond to the allegations, it would introduce serious due process concerns into this matter. (*Id.* at 2.) In any event, Mr. Downs told Mr. SanFord that Petitioners would respond to the Complaint by November 4, 2022—17 days earlier than originally agreed. (*Id.*)

D. Despite its prior assurances, OCF rushed its decision and erred in doing so.

On October 27, 2022, OCF notified Petitioners of its adverse order. (*See generally Exhibit 5.*) Despite no reference to 3 D.C. Mun. Regs. §§ 3013.1 and 4209.6 in the Complaint, and no notice that OCF was investigating violations of these provisions, OCF found Petitioners “are in violation of 3DCMR Section 3033.1 [*sic*] and 3DCMR Section 4209.6 pursuant to their expenditure of Fair Election Funds to commission a Poll regarding a Primary Election in which the Councilmember was not a candidate.” (*Id.* at 12.) Those provisions require FEP funds to “be used solely for the purpose of financing, directly or indirectly, the election campaign of a candidate,” § 3013.1, and prohibit “[a]n expenditure for any other purpose other than the furtherance of the participating candidate’s ... election,” § 4209.6. Without citation to authority or any OCF guidance, OCF concluded that Petitioners’ \$6,277.52 in polling expenditures “[c]learly ... was not an acceptable expenditure of campaign funds.” (*Id.* at 12.) Thus, OCF ordered Petitioners “to refund the amount of \$6,1277.52 [*sic*] and all other costs associated with the [Polls] to the Fair Elections Program.” (*Id.* at 13.)

Because OCF committed multiple errors in investigating and resolving the Complaint, Petitioners request an expediated hearing de novo under 3 D.C. Mun. Regs. § 3709.11.

ARGUMENT

I. OCF Violated Petitioners’ Due Process Rights.

A procedural due process violation occurs “when a government official deprives” a person of property or liberty “without appropriate procedural protections.” *English v. District of Columbia*, 717 F.3d 968, 972 (D.C. Cir. 2013). At minimum, the Constitution requires government actors to afford an individual “notice and an opportunity to be heard” before depriving the individual’s or liberty or property. *Id.*

OCF’s order violated Petitioners’ due process rights in at least two ways. *First*, in finding that Petitioners violated 3 D.C. Mun. Regs. §§ 3013.1 and 4209.6, OCF deprived Petitioners of sufficient notice. These regulations do not appear anywhere in the Complaint, which only alleged that the Polls constituted an “unauthorized in-kind contribution” in violation of “section 332f(d)(5)” of D.C.’s Campaign Finance Act of 2011. (**Exhibit 2 ¶¶** 13, 16–21.) And despite frequent correspondence regarding the investigation and Complaint, OCF did not provide

Petitioners any indication that they were being investigated for violating 3 D.C. Mun. Regs. §§ 3013.1 and 4209.6. This lack of notice did not stop OCF from searching for violations outside the four corners of the Complaint. OCF acknowledges as much in its order, circumventing the actual allegations because “the expenditure of campaign funds” on polls “in which the Candidate was not on the ballot *also raises questions [about] whether other violations may have occurred.*” (**Exhibit 5** at 4 (emphasis added).) Thus, not only did OCF fail to give Petitioners notice of the ultimate violations found, but it actively searched for such violations outside the Complaint’s allegations. This lack of notice and opportunity to be heard in response to unalleged violations raised sua sponte by OCF violated Petitioners’ due process rights.

Second, OCF deprived Petitioners due process by moving the goalposts on the response deadline in contradiction of its assurances. From Mr. Downs’s first call addressing the Complaint with OCF on August 31, 2022, Mr. SanFord agreed that Petitioners would have 90 days—including November 21, 2022—to respond to the Complaint and assured Mr. Downs that OCF would not issue any ruling on the Complaint until Petitioners responded. The Board need not take Petitioners’ word for it; Mr. SanFord confirmed this agreement in writing hours after speaking with Mr. Downs. (**Exhibit 4** at 2, attach. 2 at 1.) Then, a month later, Mr. SanFord reversed course without any explanation and demanded that Petitioners respond to the Complaint in seven days. (*Id.* at 2.) Equally concerning, when reversing course of the response deadline, Mr. SanFord refused to acknowledge his own prior written assurances about the response deadline. Given this abrupt about-face, Mr. Downs informed OCF in writing on October 14, 2022, that Petitioners would not be responding by the new deadline, but assured OCF that Petitioners would respond by November 4, 2022. (*Id.* at 3.) But OCF issued its adverse order on October 27, 2022, without affording Petitioners any opportunity to be heard on the violations entered against them. Thus, OCF’s order deprived Petitioners of an opportunity to be heard by: (1) renegeing on a response deadline that Petitioners relied on; and (2) issuing an adverse order before Petitioners responded to the Complaint.

Given these violations, the Board should immediately vacate OCF’s order and remand the case to afford Petitioners the opportunity to respond to the Complaint.

II. OCF Erred in Finding Violations of 3 D.C. Mun. Regs. §§ 3013.1 and 4209.6.

OCF’s order fares no better on substance. The order concludes that, in conducting the Polls, Councilmember Silverman violated 3 D.C. Mun. Regs. §§ 3013.1 and 4209.6, respectively. (*See Exhibit 5* at 12.) Because nothing on this record supports a violation of either provision, the Board should vacate OCF’s order in its entirety.

Sections 3013.1 and 4209.6 effectively preclude the same activity. Section 3013.1 requires FEP funds to “be used solely for the purpose of financing, directly or indirectly, the election campaign of a candidate,” whereas section 4209.6 prohibits “[a]n expenditure for any other purpose other than the furtherance of the participating candidate’s ... election.” In short, these provisions prohibit a candidate from using FEP funds for any “purpose” other than “financing,” or “furthering” the participating candidate’s own election.

On the record before OCF, the Polls were conducted for one primary purpose: to benefit Councilmember Silverman's reelection. As explained at length in her written answers to OCF's questions, Petitioners commissioned the Polls for Councilmember Silverman's benefit. Historically Ward 3 is an important Ward for her at-large bid; the Polls allowed Councilmember Silverman to align herself with a candidate that not only reflected her own policies and values, but had a chance to win. Had she endorsed a candidate without vetting the candidate, including polling, she risked harming her own electoral chances. Separately, DFER was spending millions in the Ward 3 race before Petitioner conducted the Polls. Because DFER and DFER-backed candidates represent a direct threat to Councilmember Silverman's electoral success, the Polls benefited Councilmember Silverman by allowing her to align herself with the Ward 3 candidate who had the best chance to beat a DFER-funded candidate.

On the other hand, the record contains *no evidence* that the Polls were conducted for any purpose other than furthering Councilmember Silverman's reelection. And how could it? OCF issued its adverse order without interviewing or investigating *any* other candidates from the 2022 Primary Election—or any other person for that matter. In that way, the violations found in OCF's order are wholly without evidentiary support.

Moreover, the implications of affirming OCF's unsupported conclusion impacts every campaign expenditure in future D.C. elections. If any spending to benefit a candidate's election can be forged into a campaign-finance violation without evidence to the contrary, OCF will become a clearinghouse for campaign expenditures, examining the "purpose" of every expenditure to determine whether it was truly for the purpose of financing or furthering the candidate's election. Take campaign expenditures to feed campaign staff on election night. Is an expenditure for a platter of Jimmy John's sandwiches made for the purpose of furthering the candidate's election, or was it merely for the benefit of a group of hungry volunteers? OCF's ruling invites these inquiries into trivial campaign-finance expenditures going forward.

At bottom, OCF's order not only failed to identify a specific violation on the face of Petitioners' conduct, but also reached its conclusion without any supporting evidence. Accordingly, OCF's order was issued in error and should be reversed.

CONCLUSION

Petitioners request that the Board VACATE OCF's October 27, 2022 order and REMAND with instructions that OCF provide Petitioners an opportunity to respond to the Complaint. If the Board reaches the merits of the order, Petitioners ask that the order be REVERSED and the Complaint DISMISSED.

DATED this 2nd day of November, 2022.

BROWNSTEIN HYATT FARBER SCHRECK, LLP

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Attorney for Petitioners