

<p>SUPREME COURT, STATE OF COLORADO</p> <p>2 East 14th Avenue Denver, Colorado 80203</p>	
<p>In the Matter of the Title, Ballot Title, and Submission Clause for Proposed Initiative 2023-2024 #197</p> <p>Petitioner: Linda Good f/k/a Linda Bissett,</p> <p>v.</p> <p>Respondents: Jason Bertolacci and Owen Alexander Clough,</p> <p>and</p> <p>Title Board: Theresa Conley, Christy Chase, Jennifer Sullivan</p>	
<p>Attorneys for Respondents:</p> <p>Sarah M. Mercer, #39367 David B. Meschke, #47728 Rosa L. Baum, #56652 BROWNSTEIN HYATT FARBER SCHRECK, LLP 675 15th Street, Suite 2900 Denver, CO 80202 Tel: 303.223.1100; Fax: 303.223.1111 smercercer@bhfs.com; dmeschke@bhfs.com; rbaum@bhfs.com</p>	<p>▲ COURT USE ONLY ▲</p> <p>Case Number: 2024SA93</p>
<p>RESPONDENTS' ANSWER BRIEF</p>	

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 3,462 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.

In response to each issue raised, the appellee must provide under a separate heading before the discussion of the issue, a statement indicating whether appellee agrees with appellant's statements concerning the standard of review and preservation for appeal and, if not, why not.

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/ Rosa Baum

TABLE OF CONTENTS

	Page
SUMMARY OF THE ARGUMENT	1
ARGUMENT	2
I. The Title Board properly determined that Initiative #197 encompasses a single subject.....	2
A. Requiring that the governor call the vacancy election is an implementing provision, not a separate subject.	3
1. Establishing the method by which a vacancy election is called is an implementing provision.....	4
2. Ms. Good disregards key elements of the Initiative to devise a troubling scenario.....	6
B. Establishing that a new vacancy election be conducted by a ranked voting method is not a second subject, but rather an implementing provision.	12
II. The Title Board set an accurate and clear title for Initiative #197.....	16
A. Language in Initiative #197’s title reflects the Initiative’s elements.	16
B. Initiative #197’s title properly indicates the vacancy election will be held as soon as possible.	18
CONCLUSION	18

TABLE OF AUTHORITIES

	Page(s)
Cases	
<i>Anderson v. Griswold</i> , 543 P.3d 283 (Colo. 2023)	10
<i>Trump v. Anderson</i> , 601 U.S. 100 (2024)	10
<i>People v. District Court</i> , 713 P.2d 918 (Colo. 1986)	7
<i>Meyer v. Alaskans for Better Elections</i> , 465 P.3d 477 (Alaska 2020)	12
<i>Moody v. People</i> , 159 P.3d 611 (Colo. 2007)	3
<i>State v. Nieto</i> , 993 P.2d 493 (Colo. 2000)	7
<i>In re Proposed Ballot Initiative on Parental Rights</i> , 913 P.2d 1127 (Colo. 1996)	3, 16
<i>In re Title, Ballot Title & Submission Clause for 2015–2016</i> #73, 369 P.3d 565 (Colo. 2016)	18
<i>Matter of Title, Ballot Title, & Submission Clause for 2021-</i> <i>2022 #16</i> , 489 P.3d 1217 (Colo. 2021)	2
<i>In re Title, Ballot Title and Submission Clause and</i> <i>Summary for 1999–2000 No. 200A</i> , 992 P.2d 27 (Colo. 2000)	4, 14
<i>In re Title, Ballot Title and Submission Clause, and</i> <i>Summary for 1999-00 #256</i> , 12 P.3d 246 (Colo. 2000)	6, 13
<i>Matter of Title, Ballot Title, and Submission Clause for</i> <i>2013–2014 #76</i> , 333 P.3d 76 (Colo. 2014)	14

Matter of Title, Ballot Title and Submission Clause for 2019-2020 #315, 500 P.3d 363 (Colo. 2020) 3, 18

Matter of Title, Ballot Title and Submission Clause, Summary Clause for 1997–1998 No. 74, 962 P.2d 927 (Colo. 1998) 4, 14

Constitutional Provisions

Colo. Const. art. IV, § 6 11

Colo. Const. art. V, § 1..... 16

Colo. Const. art. V § 2..... 17

Colo. Const. art. VI, § 20 11

Statutes

C.R.S § 1-1-113 10

C.R.S § 1-4-104 15

C.R.S. § 1-12-201 11

C.R.S § 1-12-202 11

C.R.S § 1-12-203 5, 7, 8, 9

C.R.S. § 1-12-204 11

C.R.S. § 1-40-106 16, 18

C.R.S. § 2-4-201 7

Other Authorities

Title Board Hearing continuation (April 3, 2024)..... 8, 10

Respondents Jason Bertolacci and Owen Alexander Clough, the proponents of Proposed Initiative 2023-2024 #197 (collectively “Respondent Proponents”), through undersigned counsel, submit their Answer Brief in this original proceeding brought by Petitioner Linda Good (“Ms. Good” or “Petitioner”) challenging the actions of the Ballot Title Setting Board (“Title Board” or the “Board”) to set a title on Proposed Initiative 2023-2024 #197 (unofficially captioned “Elections to Fill Vacancies in the General Assembly”).

SUMMARY OF THE ARGUMENT

To reorient the Court, Initiative #197 seeks to modernize the election process by addressing a specific ill of the current election system: as of the submission of this brief, political party vacancy committees, which consist of a small number of party insiders, have selected approximately one-third of the members of the Colorado General Assembly. Using vacancy committees to fill these vacancies leaves a significant percentage of Colorado voters without a direct say in electing their ultimate representative to the state legislature.

Initiative #197 eliminates this vacancy appointment process for selecting state legislators and establishes that a vacancy be filled by an election. Petitioner’s quarrels with the Initiative mischaracterize implementing provisions—that the election be held as soon as possible after the vacancy occurs and that it be conducted by a ranked voting method—in an effort to manufacture single subject concerns. These are quarrels about the Initiative’s policy, irrelevant to the single-subject determination. The Title Board correctly concluded that Initiative #197 encompasses a single subject, determined it therefore had jurisdiction over the Initiative, and set a brief and comprehensive title. This Court should, therefore, affirm the Board’s decision.

ARGUMENT

I. The Title Board properly determined that Initiative #197 encompasses a single subject.

As the Court is well aware, “an initiative will not be deemed to violate the single subject requirement merely because it spells out details relating to its implementation.” *Matter of Title, Ballot Title, & Submission Clause for 2021-2022 #16*, 489 P.3d 1217, 1221 (Colo. 2021)

(quoting *Matter of Title, Ballot Title and Submission Clause for 2019-2020 #315*, 500 P.3d 363, 367 (Colo. 2020)).

A. Requiring that the governor call the vacancy election is an implementing provision, not a separate subject.

Petitioner raises various arguments related to the involvement of the governor under Initiative #197 for the first time in her Opening Brief, and then again in her Answer Brief.¹ This Court should disregard those arguments as waived. *In re Proposed Ballot Initiative on Parental Rights*, 913 P.2d 1127, 1130 n.3 (Colo. 1996) (“[P]etitioners failed to raise this contention in their motion for rehearing, and, accordingly, we refuse to address the issue here.”) *Moody v. People*, 159 P.3d 611, 614 (Colo. 2007) (It is a “basic principle of appellate jurisprudence that arguments not advanced on appeal are generally deemed waived.”).

Yet, even if the Court were to consider Ms. Good’s arguments, she points to the Initiative’s implementing provisions that are necessarily and properly connected to the Initiative’s single subject: filling vacancies

¹ Petitioner filed her Answer Brief in this appeal a week before the deadline to do so. Her arguments in the Answer Brief largely repeat those made in her Opening Brief.

in the state legislature by voters through an election. And consequently, Ms. Good appears to be misinterpreting Initiative #197's single subject and confusing it with other measures currently before the Title Board. *See, e.g.,* Pet'r's Answer Br. at 5 (claiming Respondent Proponents' "stated single subject" includes "increasing voter participation through elected officials receiving the majority of votes in a Ranked Choice Voting method"). In fact, Ms. Good cites to and paraphrases Title Board hearings and discussions on separate measures.

1. Establishing the method by which a vacancy election is called is an implementing provision.

In drafting the Initiative, Respondent Proponents faced a statutory landscape that did not provide a mechanism for calling this new election to fill vacant seats in the General Assembly—the task is currently done by a party committee that seeks no input from the voters. Therefore, to effectuate Initiative #197's solicitation of voter input, the Initiative required a provision to set the election. This implementation detail does not defeat single subject. *See In re Title, Ballot Title and Submission Clause and Summary for 1999–2000 No. 200A*, 992 P.2d 27, 30 (Colo. 2000) (quoting *Matter of Title, Ballot Title and Submission Clause*,

Summary Clause for 1997–1998 No. 74, 962 P.2d 927, 929 (Colo. 1998)

“Implementation details that are ‘directly tied’ to the initiative’s ‘central focus’ do not constitute a separate subject.”).

The Initiative’s implementing language requiring the governor to set the vacancy election begins in section 1-12-203(1)(a), C.R.S. The requirement states:

[T]he governor shall set a day to hold a legislative election to elect a person to fill any [General Assembly] vacancy [created by the death or resignation of a member] as soon as practicable after the vacancy occurs. The election shall be held in the district for the vacant general assembly seat and no precinct or precincts may be excluded.

Respondent Proponents deliberately used the term “shall” in order to impose a duty upon the governor to call the vacancy election “as soon as practicable.” In turn, proposed section 1-12-203(1)(b) creates a limited exception to the governor’s duty to set a special vacancy election. And finally, subsection (1.7) assures continued compliance with articles 1 through 13 of title 1 of the Colorado Revised Statutes.

As argued in Respondent Proponents’ Opening Brief, Ms. Good’s interpretation of how the single subject analysis applies to Initiative #197 would too thinly slice the ideas within the Initiative so as to impede

Respondent Proponents' right to the citizen initiative process. *See* Resp't Proponents' Opening Br. at 10–11. If, for example, the method of calling the contemplated election had to be its own initiative, this could result in the replacement of the vacancy committee with an election but no way to call the vacancy election. *See Id.* Thus, delineating this implementing detail is critical to the Initiative.

2. Ms. Good disregards key elements of the Initiative to devise a troubling scenario.

Ms. Good attempts to shoehorn into this Court's consideration an argument made by a different objector before the Title Board regarding a separate measure. Because she never made these arguments before the briefing, this Court should consider these arguments waived. Moreover, Ms. Good's argument speculates as to the effects of the Initiative, a task not before the Court. *See In re Title, Ballot Title and Submission Clause, and Summary for 1999-00 #256*, 12 P.3d 246, 257 (Colo. 2000) ("Whether the Initiative will indeed have the effects the petitioners claim is beyond the scope of our review.") Nevertheless, Respondent Proponents address Ms. Good's arguments.

By citing to and quoting liberally from a motion for rehearing filed against a different measure, Ms. Good appears to now interpret the Initiative to allow a sitting governor to wield the discretionary power allotted to them to keep a vacancy in General Assembly open for over two years. Pet'r's Opening Br. at 27–31; Pet'r's Answer Br. at 17–19. This interpretation is not supported by the Initiative's plain language or Respondent Proponents' intent. Rather, it is based on a truncated reading of the Initiative. To manufacture her concerns, Ms. Good must ignore Initiative #197's proposed revisions to section 1-12-203(1)(a), and instead focus on an isolated and skewed reading of the language in the proposed new subsection (1)(b).

These self-imposed blinders are contrary to the demands of statutory interpretation and prove fatal for his argument. *State v. Nieto*, 993 P.2d 493, 501 (Colo. 2000) (quoting *People v. District Court*, 713 P.2d 918, 921 (Colo. 1986)) (“a statute must be read and considered as a whole and ‘should be interpreted so as to give consistent, harmonious, and sensible effect to all its parts’”); *see also* C.R.S. § 2-4-201(1)(b) (“In enacting a statute, it is presumed that . . . [t]he entire statute is intended

to be effective.”). The sentences in subsections (1)(a) and (1)(b) must be, and can be, read consistently and harmoniously: Initiative #197 creates a continuing duty for the governor to call an election “as soon as practicable” after the creation of a vacancy in the General Assembly.

Specifically, subsection (1)(b) creates a limited circumstance in which a governor “may” decide to not set a vacancy election and wait for the next regularly scheduled November general election. For example, the governor could decide that if a vacancy occurs in June and a vacancy election would be scheduled for September—just two months before a regularly scheduled November general election—the better course of action is to wait and hold the vacancy election as part of the general election. However, if a vacancy occurs in the October before the November election, the governor has a continuing duty, under the Initiative’s amendments to section 1-12-203(1)(a), to call a vacancy election after the upcoming November general election but before the subsequent November general election two years later. Title Board Hearing continuation at 1:52:55 (April 3, 2024), *available at* https://www.coloradosos.gov/pubs/info_center/audioBroadcasts.html (Title

Board explaining that the governor’s duty outlined in subsection (1)(a) continues to apply).² The governor would violate that duty by refusing to both conduct a vacancy election with the general election and not call a separate vacancy election in the months following the general election.

Initiative #197 assures flexibility for the timing of the vacancy elections, within the confines of notice, publishing, and reporting requirements of articles 1 through 13 of title 1 of the Colorado Revised Statute. *See* Initiative #197, § 1-12-203(1.7). The exception in section 1-12-203(1)(b) acknowledges that, depending upon the timing of the vacancy, it may be unreasonable to hold a vacancy election and have the state incur related costs.

The duty Initiative #197 imposes upon the governor also has an important statutory backstop already in place. If the sitting governor does not reasonably carry out their duty to call the vacancy election,

² Respondent Proponents cite to the Title Board rehearing on Proposed Initiative 2023–2024 #219 because, while that initiative is not before the Court, it is at this hearing during which the Title Board discussed and rejected the arguments Petitioner now raises. Notably, this rehearing was held *after* Petitioner filed her Petition for Review regarding Initiative #197 with this Court.

section 1-1-113, C.R.S., contains a cause of action to enforce a failure to execute that duty. It provides a procedure for adjudicating controversies between an official with a duty under the election code and any candidate, political party officer or representative, or person making a nomination. *See* C.R.S. § 1-1-113. As explained by this Court, section 1-1-113 has “deep roots in Colorado election law.” *Anderson v. Griswold*, 543 P.3d 283, 303 (Colo. 2023), *reversed on other grounds Trump v. Anderson*, 601 U.S. 100 (2024). As a result, in the instance that a governor’s determination not to hold a vacancy is not reasonable or where the seat is not filled as soon as practicable—clearly the case where a seat remains open for over two years—the governor would be subject to a lawsuit initiated by a candidate, political party officer or representative, or voter pursuant to section 1-1-113. Title Board Hearing continuation at 1:42:50 (April 3, 2024) (noting the governor could be sued for not filling a vacant seat as soon as practicable). Therefore, both the text of the statute and other already existing provisions in Colorado law restrict a governor’s ability to wreak havoc on our representative electoral system.

Ms. Good also asserts the unfounded accusation that Respondent Proponents' selection of this method for calling the election "will impose additional costs on local communities." Pet'r's Opening Br. at 11. Not only does Petitioner neglect to indicate what these speculative costs are, delegating to the governor the duty to call an election is not a foreign concept to Colorado law. For example, under section 1-12-202, C.R.S., it falls to the governor to "set a day to hold a congressional vacancy election to fill the vacancy." And the process to fill vacancies of U.S. senators, statewide offices, and district attorneys—to name just a few—ascribes even more power to the governor as those processes include the governor *appointing* a replacement. *See* C.R.S. § 1-12-201; Colo. Const. art. IV, § 6; Colo. Const. art. VI, § 20; C.R.S. § 1-12-204. Any claim that the proposed measure subverts the current balance of power among the branches of government is unfounded. *See* Pet'r's Opening Br. at 17.

Therefore, the text of Initiative #197 properly and completely interpreted assuages Ms. Good's concerns.

B. Establishing that a new vacancy election be conducted by a ranked voting method is not a second subject, but rather an implementing provision.

As described in Respondent Proponents' Opening Brief, Ms. Good's argument that the selection of a ranked voting method for the administration of vacancy elections for the General Assembly is a second subject incorrectly assumes that vacancies in the General Assembly are already filled by a single choice election and thus Initiative #197 *changes* that election process. *See* Pet'r's Answer Br. at 8–11. There is currently no process for electing candidates to fill vacant seats in the General Assembly. Therefore, Petitioner's examples of bills she describes as embracing the single subject of “chang[ing] the conduct of” elections to ranked choice voting are inapposite. *Id.* at 8–10 (citing as examples processes in Colorado and elsewhere³ in which measures changed the

³ Petitioner also cites to the Alaska Supreme Court's decision in which that court determined that an initiative reforming the state's election process to implement a nonpartisan primary, establishing ranked choice voting in the general election, and instituting new campaign finance laws embraced a single subject. *See Meyer v. Alaskans for Better Elections*, 465 P.3d 477 (Alaska 2020). Not only is that analysis misplaced here, the measure contemplated there is more expansive than Initiative #197 and thus favors Respondent Proponents' position.

existing election administration); *cf. Concerning Voting in Presidential Primary Elections*, Colo. SB23-301 (introduced Apr. 24, 2023) (*changing the voting process in presidential primaries from single choice voting to ranked choice voting*). That implementing a ranked voting method *could* be the single subject, or even the only purpose, of an initiative that seeks to alter an existing election process is not persuasive, much less dispositive, to the case at hand. *Cf. Pet'r's Answer Br.* at 8–11.

Conversely, notwithstanding Petitioner's continued insistence that Initiative #197 *changes* the method, Respondent Proponents agree that they *could have* made the policy choice to use a single choice voting method for the newly created elections. But that decision is not one at which the single subject analysis takes aim. *See In re 1999-00 #256*, 12 P.3d at 254 (“We have never held that just because a proposal may have different effects or that it makes policy choices that are not inevitably interconnected that it necessarily violates the single-subject requirement. It is enough that the provisions of a proposal are connected.”). Because the Initiative seeks to shift the power of who decides which candidate will fill vacancies in the General Assembly from

a small number of political party insiders to the many, the selection of a ranked voting method is an “[i]mplementation detail[] that [is] ‘directly tied’ to the initiative’s ‘central focus’” and thus “do[es] not constitute a separate subject.” *In re 1999–2000 No. 200A*, 992 P.2d at 30 (quoting *In re 1997–1998 No. 74*, 962 P.2d at 929); cf. *Matter of Title, Ballot Title, and Submission Clause for 2013–2014 #76*, 333 P.3d 76, 79 (Colo. 2014) (noting single subject concerns arise when subjects matters are “disconnected or incongruous.”).

Moreover, voters are unlikely to be surprised by the Initiative’s selection of a ranked voting method for the conduct of elections. Indeed, the Initiative spells out how the election is to be administered in the very provision Ms. Good challenges, and thus provides voters a clear answer to that logical next question. *See* Resp’t Petitioners’ Opening Br. 8–9. And any remaining risk of voter confusion is unwarranted because the Initiative’s title clearly alerts voters that the vacancy elections will be conducted using ranked voting.

Petitioner’s reliance on other statutory provisions in the election code to argue that the use of a ranked voting method is somehow

“inappropriate” or contrary to the law is unpersuasive. Pet’r’s Answer Br. at 14. As Respondent Proponents explained in their Opening Brief, under a ranked voting method, it is still the candidate with the “highest number” of votes that is elected. Resp’t Proponents’ Opening Br. at 13. And Petitioner’s citation to section 1-4-104, C.R.S., and its express delineation that the candidates “who receive a plurality of the votes cast shall be the respective party nominees,” misses a critical distinction. *See* Pet’r’s Answer Br. at 14. Section 1-4-104 applies to the selection of “party nominees.” Comparatively, Initiative #197’s use of a ranked voting method results not in a party nomination, but rather in the election of a candidate for office. Thus, the Initiative does not run afoul of the section. Ms. Good’s preferences as to the administration of elections—including whether she believes Colorado voters understand ranked voting, *see* Pet’r’s Answer Br. at 9–10, or her criticism on delays in filling vacancies due to process of conducting the election, *see* Pet’r’s Opening Br. at 26, or—may influence her vote if Initiative #197 appears on her ballot, but they should not guide this Court in its single subject analysis.

II. The Title Board set an accurate and clear title for Initiative #197.

In her arguments challenging Initiative #197's title, Ms. Good once again raises arguments she did not address at the Title Board hearings. This Court should consider these arguments waived. *See In re Parental Rights*, 913 P.2d at 1130 n.3. These include (a) erroneously claiming that the title's reference to the requirement that the candidate filling the vacancy be of the same political party as the vacating member is misleading, and (b) compounding her misinterpretation of the Initiative to claim seats in the General Assembly would be left vacant for years.

However, should the Court entertain Ms. Good's arguments, the Title Board nevertheless set a clear title, *see* Colo. Const. art. V, § 1(5.5), and avoided any construction or language "for which the general understanding of the effect of a 'yes/for' or 'no/against' vote will be unclear." C.R.S. § 1-40-106(3)(b).

A. Language in Initiative #197's title reflects the Initiative's elements.

Contrary to Ms. Good's assertions, Initiative #197's title does not include provisions absent from the Initiative itself. Ms. Good claims that

the Initiative does not require that the candidate filling the vacant seat in the General Assembly be affiliated with the same political party as the vacating member and therefore that the title's inclusion of the phrase "requiring that the candidates for the vacant position be members of the same political party as the vacating legislator and allowing any eligible voter to participate in the vacancy election" is "surreptitious." *See* Pet'r's Opening Br. at 9–10; Pet'r's Answer Br. at 6. However, Initiative #197 plainly states that the vacancy election is "subject to section 2 of article V of the state constitution." Accordingly, section 2 of article V of the Colorado constitution requires that the person filling a vacancy in the General Assembly "be a member of the same political party, if any, as the person whose termination of membership in the general assembly created the vacancy." Colo. Const. art. V, § 2(3). Therefore, not only does the Initiative not eliminate this requirement, it clearly states that any election is subject to the mandate. And, ultimately, that the Title Board chose to spell out the contents of the pertinent constitutional provision does not make the title misleading; it gives voters more readily accessible information.

B. Initiative #197's title properly indicates the vacancy election will be held as soon as possible.

Like her argument on single subject, Petitioner's clear title argument on the statutory timeline resulting from Initiative #197 depends on a misreading of the Initiative. Pet'r's Answer Br. at 17–19. The phrase in Initiative #197's title “requiring the vacancy election to be held as soon as possible after the vacancy has occurred” properly reflects the continuing duty imposed upon the sitting governor to hold an election “as soon as practicable.” Requiring that the Title Board list every permutation of when a governor may call a vacancy election would add unnecessary length in violation of the clear title requirement. *See* C.R.S. § 1-40-106(3)(b) (“Ballot titles shall be brief . . .”); *see also In re 2019-2020 #315*, 500 P.3d at 369.

Initiative #197's title clearly, correctly, and fairly expresses the intent and meaning of the measure. *In re Title, Ballot Title & Submission Clause for 2015–2016 #73*, 369 P.3d 565, 568 (Colo. 2016).

CONCLUSION

Respondent Proponents respectfully request this Court to affirm the Title Board's determination on jurisdiction to set title.

Respectfully submitted April 24, 2024.

BROWNSTEIN HYATT FARBER SCHRECK LLP

/s/ Rosa Baum

Sarah M. Mercer

David B. Meschke

Rosa L. Baum

675 15th St, Suite 2900

Denver, Colorado 80202

(303) 223-1100

smercerc@bhfs.com; dmeschke@bhfs.com;

rbaum@bhfs.com

Attorneys for Respondents

CERTIFICATE OF SERVICE

I hereby certify that on April 24, 2024, I electronically filed a true and correct copy of the foregoing **RESPONDENTS ANSWER BRIEF** via the Colorado Courts E-Filing system which will send notification of such filing and service upon counsel of record and the foregoing was served via electronic mail to the *pro se Petitioner*:

Linda Good, *Pro Se*
916 E. Costilla Way
Centennial, CO 80122
LindaLaughs@ProtonMail.com

Pro Se Petitioner

Michael Kotlarczyk, Office of the Attorney General
Sam Walter, Assistant Attorney General Fellow
State Services Section
1300 Broadway, 6th Floor
Denver, CO 80203
michael.kotlarczyk@coag.gov; samuel.wolter@coag.gov

Counsel for the Title Board

/s/ Paulette M. Chesson
Paulette M. Chesson, Paralegal