SUPREME COURT, STATE OF COLORADO 2 E. 14th Avenue Denver, Colorado 80203 Original Proceeding, C.A.R. 21 Saguache County District Court Judge Martin Gonzales Case No.: 13CV30009	
In Re: **Plaintiffs:** MAURICE JONES, et al. v. **Defendants:** CHRISTIAN SAMORA, et al.	**▲ COURT USE ONLY ▲**
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BRIEF OF *AMICI CURIAE* COLORADO LAWYERS COMMITTEE, COLORADO COMMON CAUSE, AND VET VOICE FOUNDATION

C.A.R. 32 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:

The brief complies with C.A.R. 28(g).

☒ It contains 4,369 words.

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

☒ As *amici curiae* are not parties and have not raised any of the issues on appeal, the brief contains neither statements of the applicable standard of appellate review, nor citations to the precise location in the record where issues were raised and ruled on.

☒ 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.

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ISSUE PRESENTED FOR REVIEW

Whether the district court erred by setting aside the results of a municipal election because there had been the *potential* for the secrecy of ballots to be compromised, despite the court's finding that the secrecy of ballots *had not in fact* been compromised, and that the election had been free from fraud and conducted in substantial compliance with the election rules.

INTERESTS OF THE AMICI CURIAE

The Colorado Lawyers Committee ("Lawyers Committee") is a nonpartisan coalition of 59 Colorado law firms that provide pro bono legal services to improve conditions for children, the poor and other disadvantaged communities through advocacy, negotiation and litigation. Founded in 1978, the Lawyers Committee focuses primarily on major public policy issues and systemic changes rather than representation of individuals.

One of the ongoing projects of the Lawyers Committee is its Election Task Force, which was established in 2004. The Election Task Force is a bipartisan working group of individuals and organizations in the legal community which reviews and monitors election and voting rights issues. Its mission is to maximize the right of all Colorado citizens to cast and have their ballots counted without regard to factors such as race, physical disability, or income. The Lawyers Committee, through the

Election Task Force, has worked closely with five Secretaries of State on a number of issues over the past nine years. Task Force members routinely participate in public policy meetings and serve as a resource to state officials and other interested groups on election-related matters.

Colorado Common Cause ("CCC") is a state chapter of Common Cause, a national non-profit citizens' advocacy group that works to ensure open, honest and accountable government at the national, state and local levels. Founded in 1970, Common Cause currently has over 300,000 members nationwide and over 7,000 members and supporters in Colorado. Common Cause long has been a supporter and proponent of election integrity and campaign finance reforms across the nation. Citizens, lawmakers, and press have come to rely on CCC for credible, non-partisan information about government transparency, election fairness, and the influence of money in politics. Since 2004, Colorado Common Cause has a led a nonpartisan coalition focused on making sure that every eligible voter is able to cast a ballot and have confidence that the ballot is counted accurately. Based on the problems identified through this work, Common Cause works with election administrators and decision makers to advance policies for improved voter access.

The Vet Voice Foundation ("VVF") was founded in 2009 to mobilize veterans to become leaders in our nation's democracy through participation in the civic and

democratic process. VVF seeks to harness the energy and drive of the dedicated men and women who have fought for their country, and put it to work at home and in their communities on the important issues they face, such as health care, jobs, the environment, and housing. Because military members fight for the right to vote, increasing access to the vote is an important goal for VVF, and VVF believes service members need as many options to register and vote as possible. VVF has 7,652 members in Colorado, and these veterans have engaged in poll watching, voter registration, and advocating for policies that support more voter participation and protect voter rights.

The Colorado Lawyers Committee, Colorado Common Cause, and the Vet Voice Foundation (collectively, "the Amici") believe that all voters in Colorado will be directly affected by the outcome of this case.

INTRODUCTION

This case presents the Court with two important constitutional principles suspended in tension. In one direction pulls the right to vote, "a fundamental right of the first order." *Erickson v. Blair*, 670 P.2d 749, 754 (Colo. 1983). Opposing it is the constitutional command that "secrecy of the ballot is guaranteed the citizen." *Taylor v. Pile*, 391 P.2d 670, 673 (Colo. 1964). The trial court below acknowledged both principles, found them in conflict, and determined that the requirement of secrecy

outweighed the right to vote. The trial court "declare[d] the Election void *ab initio*, simply because under the circumstances the secrecy of the ballot could have been violated." Judgment (June 7, 2013), Petition for Review, Ex. 4 (hereafter "Judg."), p. 21 (emphasis added.)

The Amici agree with Petitioners that this was error. The trial court's ruling threatens all elections in Colorado. For instance, any disabled voter seeking assistance in the polling place, or any overseas military voter choosing to email his ballot, would thereby risk voiding the results of an entire election. The mere possibility of a secrecy violation cannot outweigh the fundamental right of the people to be heard.

SUMMARY OF ARGUMENT

This Court has repeatedly and emphatically recognized that a citizen's right to vote is fundamental. The citizen's right to a secret ballot is likewise enshrined in the Colorado Constitution, and is essential to preventing fraud and maintaining the integrity of elections. But secrecy has never been described as "fundamental," and the mere possibility that secrecy could have been violated should not result in an entire election being set aside – especially where, as here, there was no actual harm to any voter's right to secrecy. The trial court's ruling here is inconsistent with Colorado law and threatens to restrict access to the vote for thousands of Colorado voters. This Court should grant the Petition for Review, reverse the trial court's holding, and

clarify that, in the absence of fraud or illegality, the mere possibility that voter secrecy could have been violated is insufficient to void the results of an election.

ARGUMENT

I. THE RIGHT TO VOTE IS FUNDAMENTAL.

Constitutional government rests upon a foundation of ballots. Access to the ballot is protected by the Colorado Constitution, which (unlike its federal counterpart) explicitly creates a right to vote: "[a]ll elections shall be free and open; and no power, civil or military, shall at any time interfere to prevent the free exercise of the right of suffrage." COLO. CONST. Art. II, § 5. A citizen's right to vote "is fundamental because its exercise preserves all other rights." *Bruce v. City of Colorado Springs*, 971 P.2d 679, 684 (Colo. App. 1998), *citing Harman v. Forssenius*, 380 U.S. 528 (1965).

For that reason, this Court has long recognized that "the right to vote is at the core of our constitutional system and is a fundamental right of every citizen." *Jarmel v. Putnam*, 499 P.2d 603, 603 (Colo. 1972), *citing Dunn v. Blumstein*, 405 U.S. 330 (1972). "[i]t is axiomatic that 'the right to vote is a fundamental right of the first order.'" *Bickel v. City of Boulder*, 885 P.2d 215, 225 (Colo. 1994) (emphasis added), *quoting Meyer v. Lamm*, 846 P.2d 862, 874 (Colo. 1993).

A. Because Voting is a Fundamental Right, Election Statutes are Liberally Construed.

From this first principle spring several well-established rules of law. First, election statutes must be liberally construed: "no law should be so strictly construed as to prohibit from voting those otherwise qualified to exercise the privilege." *In re Interrogatories of the U.S. Dist. Court Pursuant to Rule 21.1*, 642 P.2d 496, 497 (Colo. 1982), *citing Kellogg v. Hickman*, 21 P. 325 (Colo. 1888). The rule of liberal construction protects the right to vote against unnecessary restrictions. *Meyer*, 846 P.2d at 875. For instance, this Court held in *Erikson v. Blair* that it must "interpret absentee voting legislation in light of the realities of modern life and the fundamental character of the right of suffrage," in order "to permit a fuller expression of public opinion at the ballot box." 670 P.2d at 754 (internal quotations and citation omitted). Indeed, the Municipal Election Code, which governed the election at issue here, codifies the rule of liberal construction. C.R.S. (2012) § 31-10-1538 ("This article shall be liberally construed so that all legally registered electors may be permitted to vote . . . .").

B. Because Voting is a Fundamental Right, the Law Requires Only Substantial Compliance With Election Statutes.

Second, and corollary to this rule of liberal construction, is the rule of substantial compliance. For over a century, this Court has been "committed to the doctrine that all provisions of the election laws are not mandatory, and that the will of the electors when fully and freely expressed will not be defeated by a strict and

technical construction of the law." *Johnson v. Earl*, 94 P. 294, 299 (Colo. 1908)*; see also Meyer*, 846 P.2d at 875 ("the rule of substantial compliance is firmly grounded in prior decisions of this court"). An election will not be void merely for failure to strictly comply with election regulations, unless a statute explicitly demands such compliance. *Meyer*, 846 P.2d at 875-76 (collecting cases). All voters "should be able to present their views on issues of public importance without being encumbered by an unyielding standard of statutory exactitude." *Erikson*, 670 P.2d at 754; *see also Moran v. Carlstrom*, 775 P.2d 1176, 1180 (Colo. 1989) (same); Petition, pp. 15-17.

C. Because Voting is a Fundamental Right, an Election May Not Be Lightly Set Aside.

Finally, Colorado observes the general rule that, as expressions of the popular will, "elections are not lightly set aside." *Kelly v. Novey*, 318 P.2d 214, 215 (Colo. 1957); *see Baldauf v. Gunson*, 8 P.2d 265, 266 (Colo. 1932) ("the power to reject election returns should be exercised with great caution and only as a last resort"); *Burbank v. Board of Com'rs of Eagle County*, 201 P. 43, 45 (Colo. 1921) ("The result of the election is manifestly an expression of the popular will … and should not be lightly set aside."); *Felzien v. School Dist. RE-3 Frenchman*, 380 P.2d 572, 574 (Colo. 1963) ("Elections should not be lightly set aside."); *Bickel*, 885 P.2d at 227 ("We have recognized that elections should not be lightly set aside . . . .") (internal quotations, alterations and citation omitted).

A court may void the results of an election only if the evidence of fraud or misconduct is sufficient to overcome the presumption that the election is a valid expression of the people's will. *Baldauf*, 8 P.2d at 266. Absent such proof of fraud or misconduct, "'[t]he will of the people should not be defeated by an honest mistake of election officers … form should be subservient to substance when no legal voter has been deprived of his vote and no injury of any kind has been done to anyone.'" *Id.*, *quoting Weston v. Markgraf*, 160 N.E. 215, 217 (Ill. 1928).

In short, this Court has consistently refused to void elections unless there is clear evidence of fraud or misconduct. To do otherwise would undermine the foundation of the republic: the citizens' right to vote.

II. SECRECY IS ESSENTIAL, BUT NOT FUNDAMENTAL.

Secrecy is likewise a constitutional guarantee. *See Taylor*, 391 P.2d at 673 ("[T]he secrecy of the ballot is guaranteed the citizen."). Specifically, the Colorado Constitution mandates that "[a]ll elections by the people shall be by ballot, and … no ballots shall be marked in any way whereby the ballot can be identified as the ballot of the person casting it." COLO. CONST. Art. VII, § 8; *see id.* (permitting the use of voting machines, "provided that secrecy in voting is preserved"). Though this Court has never described the right to secrecy as "fundamental" for purposes of equal-

protection analysis,[1] secrecy is undoubtedly "essential" to our political system. *Mahaffy v. Barnhill*, 855 P.2d 847, 850 (Colo. 1993) ("Secrecy after casting a ballot is as essential as secrecy in the act of voting, and should also be preserved as vigorously.").

A. The Purpose of Secret Voting is to Prevent Corruption.

Like many states in the late nineteenth century, Colorado adopted the "Australian ballot" as a means to prevent political corruption by removing any ability (or incentive) for an elector to sell his vote. E. Scott Adler & Thad E. Hall, *Ballots, Transparency, and Democracy,* 12 ELECTION L. J. 146, 148-49 (2013) (describing the secret ballot as one of several reforms intended "as a means of eliminating the 'vote market'"). In *Vigil v. Garcia,* this Court recognized that "[t]he Australian ballot law was enacted for the purpose of promoting purity of elections," and accordingly, held that persons assisting illiterate voters must be sworn to secrecy or "[i]t will be possible for any number of voters to market their votes and call in the judges to see the goods properly delivered … a machine in aid of corruption." 87 P. 543, 546-47 (Colo.

[1] Respondents argue that the constitutional guarantee of secrecy represents a fundamental right – *see, e.g.,* Ans. br., pp. 38-41, 41 (secrecy in voting "is fundamental and requires strict observance"), *citing Taylor*, 391 P.2d at 673. But Respondents overstate *Taylor*'s holding. The *Taylor* court used the term "fundamental" in describing the district attorney's brief, which consisted of "two propositions … propositions so fundamental to our system of government" that they required no additional authority. *Id.* In other words, the *Taylor* court did not explicitly label secrecy itself as a "fundamental right." Moreover, its decision ultimately turned on flaws destroying the trial court's jurisdiction, not on secrecy. *Id.* at 671, 673-74. The Amici thus disagree that *Taylor* is "a towering pronouncement about the central character of the right to vote by secret ballot." Ans. br., p. 39.

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1906). Thus, the constitutional use of the term "ballot" itself implies the secret ballot, as distinct from *viva voce* or open voting. *See State v. Jackson*, 811 N.E.2d 68, 71-73 (Ohio 2004) (interpreting similar constitutional language, concluding "that 'ballot' must mean 'secret voting'").

From this constitutional and historical purpose, it follows that serious violations of ballot secrecy must void an election. For instance, in *Taylor*, this Court held that "[t]he use of 'marked ballots' by which the vote of every elector could be ascertained resulted in a void election." 391 P.2d at 673 (emphasis added); *see id.* ("In the 'election' under consideration there were no ballots cast except 'marked' ballots."). In *Vigil*, "the judge became so intoxicated as to be incapacitated for duty and compelled to sleep during much of the time that the votes were being counted;" among numerous other irregularities, the count was "made in a large part by unsworn and unauthorized persons while the election officers were either asleep or sitting around smoking." 87 P. at 546. This Court found that where "misconduct has the effect of destroying the integrity of the returns and avoiding the prima facie character which they ought to bear, such returns should be rejected." *Id.* at 547. Similarly, in *Mahaffey*, where the trial court found that ten electors had voted illegally in an election decided by only four votes, this Court determined that the contestor had overcome

the presumption of legality and "sustained his burden" to set aside the results. 855 P.2d at 851.

In sum, election results "may be rejected where fraud and irregularities occur to such an extent that it is impossible to separate with reasonable certainty the legal votes from the illegal or spurious votes." *Baldauf*, 8 P.2d at 266.

B. The Right to Secrecy is Defined More Narrowly Than the Right to Vote.

Yet while this Court has liberally construed the right to vote (*supra*, § I), the boundaries of the right to secrecy have been delineated far more precisely. In *Mahaffy*, for instance, this Court reaffirmed *Taylor* but construed its holding narrowly: "*Taylor* stands for the proposition that where voters who appear on the election rolls vote with the good faith belief that they are eligible to do so, they may not thereafter be required to disclose how they voted." 855 P.2d at 850. Importantly, the *Mahaffey* court specified that an elector's right to secrecy "is personal, and it is for the voter to determine whether to invoke its protection." *Id.* at 851.

Five years later, in *Bruce v. City of Colorado Springs*, the court of appeals heard constitutional and statutory challenges to a mail-ballot election, and rejected both. 971 P.2d at 683-84. First, the plaintiff argued that "the possibility that fraud may occur" outweighed the government's interest in promoting citizens' exercise of their right to vote. *Id.* at 683. The court disagreed, holding that "[t]he right to vote is the

essence of a democratic society…. Thus, legislative efforts to achieve this goal of increased voter participation should be encouraged." *Id.* at 684, *citing Peterson v. City of San Diego*, 666 P.2d 975 (Cal. 1983). The plaintiff went on to urge that even so, in this particular election "voters in this election were denied their right to a secret ballot and, therefore, the election is void." *Bruce*, 971 P.2d at 685. The court again disagreed, holding that "[s]ubstantial compliance provides the appropriate level" of review. *Id.* In the absence of fraud, the court refused to void the election. *Id.*

Notably, the *Peterson* case approvingly cited in *Bruce* rejected a constitutional argument based on the right to secret voting:

> [T]he secrecy provision of [the California] Constitution was never intended to preclude reasonable measures to facilitate and increase exercise of the right to vote such as absentee and mail ballot voting. We may not assume that the secrecy provision was designed to serve a purpose other than its obvious one of protecting the voter's right to act in secret, <u>when such an assumption would impair rather than facilitate exercise of the fundamental right</u>.

666 P.2d at 978 (emphasis added). *See also Wilks v. Mouton*, 722 P.2d 187, 193 (Cal. 1986) (construing *Peterson*, holding that the constitutional mandate that "'[v]oting shall be secret.' … does not mean that every ballot including absentee and mailed ballots must actually be cast in secret").

Most recently, in *Marks v. Koch*, the court of appeals closely considered the meaning of Art. VII, § 8, and "conclude[d] that the phrase 'secrecy in voting' … protects from public disclosure the identity of an individual voter and any content of

the voter's ballot that could identify the voter." 284 P.3d 118, 122 (Colo. App. 2011) *cert. granted,* 11SC816, 2012 WL 1305968 (Apr. 16, 2012), *cert. denied as improvidently granted* (June 21, 2012), *reh'g denied* (July 16, 2012). Most relevant here, the court held that "[t]he content of a ballot is *not* protected … when the identity of the voter cannot be discerned from the face of that ballot." *Id.* (second emphasis added). The court thus determined that the constitutional guarantee of secrecy did not protect electronic images of voted ballots from being released as public records pursuant to the Colorado Open Records Act. *Id.* at 123-24.

In sum, while secrecy in voting is "essential," Colorado courts have not considered it to be "fundamental." Only when violations of secrecy have risen to the level of pervasive fraud, calling into question the fairness of election results, will courts allow those results to be set aside and the election voided. *See also Wilks*, 722 P.2d at 194 (plaintiff's request that the court "invalidate each of the votes cast because it was not cast in secret is inconsistent with our obligation in reviewing a contested election to protect the individual's exercise of the franchise in the absence of manifest illegality").

III. THE COURT SHOULD CLARIFY THAT AN ELECTION CANNOT BE VOIDED BY THE MERE POSSIBILITY THAT SECRECY COULD HAVE BEEN VIOLATED.

Some circumstances permit, even compel, a court to void an election. This is not such a case. And while this case reveals a tension between the fundamental right to vote and the constitutional mandate of secret voting, the Court need not choose between the two – because here, *there was no actual violation of secrecy*. This Court should grant the Petition to clarify that setting aside an entire election is not the proper remedy for a merely theoretical breach of secrecy.

A. The Trial Court Voided the Election Despite Finding That There Had Been No Fraud and No Violation of Secrecy.

Despite finding no fraud and no violation of the secret ballot, the trial court set aside the election. In its order below, the trial court unambiguously found that there were no actual violations of ballot secrecy:

> The Court is satisfied that counting of absentee ballots occurred with stubs affixe[d] but, that this was not intentional nor is there any evidence that anyone, including the election judges, took this opportunity to in fact violate the secrecy of the ballot.

Judg., ¶ 35, p. 11 (emphasis added). The trial court also explicitly found that "[t]his Election was free from 'clearly established … frauds' and from culpable negligence." *Id.*, p. 19, *quoting Baldauf*, 8 P.2d at 266 (trial court's ellipses).

Even so, the trial court concluded that it "has a duty under *Taylor v. Pile* to declare the Election void *ab initio*, simply because … the secrecy of the ballot could

have been violated." Judg., p. 21 (emphasis added). The "critical point" for the trial court was "that the election judges had access to the list [of absentee ballot numbers] … they could have made a mental or physical note of the absentee ballot numbers corresponding to specific voters[.]" *Id.* (emphasis added). The trial court was wrong: it had no such duty, and its holding (if allowed to stand) would unduly restrict the fundamental right to vote of thousands of legal voters.

B. The Trial Court's Reliance on *Taylor* is Inconsistent With Subsequent Decisions of This Court.

The trial court's decision is inconsistent with more recent pronouncements from this Court regarding the fundamental right to vote. For instance, in *Erickson*, this Court announced that absentee voters, "no less than in-person voters, should be able to present their views on issues of public importance without being encumbered by an unyielding standard of statutory exactitude." 670 P.2d at 754. The *Erickson* court explicitly balanced the right to be protected against the actual harm, and rejected "the needless disenfranchisement of absent voters for unintended and insubstantial irregularities without any demonstrable social benefit." *Id.* at 755 (emphasis added); *see also Bickel*, 885 P.2d at 226-27 ("Imposing a requirement of strict compliance with voting regulations, especially in the absence of any showing of fraud or other intentional wrongdoing, would unduly restrict the franchise.") (emphasis added).

Respondents argue that these cases are inapposite because secrecy is not procedural. Ans. br., pp. 39-42 (rule of substantial compliance applies only to "lesser legal obligations, and secrecy in voting does not fall into that category."). But courts have in fact applied the substantial compliance standard to preserve the rights of absent voters against challenges grounded in ballot secrecy. The *Bruce* court rejected the plaintiff's similar argument that "because the statutory requirements … were not followed, voters in this election were denied their right to a secret ballot and, therefore, the election is void." 971 P.2d at 685. Even though the errors alleged by the plaintiff implicated ballot secrecy, the court applied the substantial compliance standard, and – in the absence of fraud – refused to void the election. *Id.; see also Meyer*, 846 P.2d at 876 (rule of substantial compliance applies to rules of election procedure, including those designed "to protect the voter in his constitutional right to vote in secret") (*quoting Young v. Simpson*, 42 P. 666 (Colo. 1895)).

C. The Trial Court's Ruling Will Make Modern Elections Unworkable.

Moreover, if it is allowed to stand, the trial court's ruling will have serious, negative effects upon ballot access. Most voters in Colorado no longer vote in person. A rule allowing courts to void an election whenever and wherever "the secrecy of the ballot could have been violated" potentially would disenfranchise millions of voters.

For instance, under the Municipal Election Code that governed this election, a disabled voter who requires assistance "is entitled, upon his request, to receive the assistance of any one of the judges of election or, at his option, of any qualified elector." C.R.S. (2012) § 31-10-608(1). Under the trial court's ruling, any such assistance would risk voiding the entire election, since the judge or elector entering the polling booth could make "a mental or physical note" of how the disabled elector voted. Similarly, under the federal Uniform and Overseas Citizens and Absentee Voters Act (UOCAVA), Colorado must allow military and other overseas voters to return their ballot by fax or email, methods which are neither secret nor anonymous. *See* Colo. Sec. of State, Elections Div., *2011-2012 Guide for Military and Overseas Electors* (2011), p. 4, *http://www.sos.state.co.us/pubs/elections/UOCAVA_Info/Guide.pdf*. By the trial court's rule, any election which included such unsecured overseas votes would be subject to challenge and void for the obvious *possibility* that a judge could note how some individuals had voted.[2]

The Petitioners and other *amici curiae* have ably described in more detail the effect of the trial court's ruling on Colorado elections. The Amici share their

[2] Under UOCAVA, voters choosing these unsecured methods must also execute a waiver of their right to secrecy. *See* Election Rule 25.2.6, 8 CCR § 1505-1 (2011). But this does not alter the analysis. Those unsecured ballots, like absentee ballots, are viewed and counted by judges sworn to secrecy. *See* C.R.S. (2012) § 1-6-114. The possibility still exists that a corrupt judge could violate that oath and engage in fraud sufficient to void the election.

concerns about the effect of the trial court's ruling on the administration of future elections in this state. Most critically, however, the ruling threatens the basic access to the ballot for every disabled, overseas, and absentee voter in Colorado.

This Court has long been committed to interpreting "absentee voting legislation in light of the realities of modern life and the fundamental character of the right of suffrage." *Erickson*, 670 P.2d at 754. The trial court's ruling is flawed in both respects. It would endanger the voting methods used by the majority of modern electors, and risk denying these citizens their most fundamental right. The Court should grant the Petition in order to reverse the trial court and clarify that a mere possibility is not enough – that only an actual breach of the constitutional guarantee of secrecy can be the basis for setting aside an entire election.

CONCLUSION

The Colorado Lawyers Committee, Colorado Common Cause, and the Vet Voice Foundation respectfully request that this Court grant the Petition for Review, reverse the trial court's holding, and clarify that, in the absence of fraud or illegality, the mere possibility that voter secrecy could have been violated is insufficient to void the results of an election.

Respectfully submitted this 9th day of August, 2013.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 9th day of August, 2013, a true and correct copy of the above and foregoing **BRIEF OF *AMICUS CURIAE* COLORADO LAWYERS COMMITTEE, COLORADO COMMON CAUSE, AND VET VOICE FOUNDATION** was filed via the ICCES e-file system.

s/ Paige Finnell
Paige Finnell