

1 Eli Dalton-Webb  
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3 Sierra Vista, Arizona 85650  
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5 *Plaintiff/Appellant*  
6

7 **IN THE ARIZONA SUPREME COURT**  
8

<p>9 Eli Dalton-Webb, a qualified elector, 10 11 Plaintiff/Appellant 12 13 v. 14 15 STEPHANIE MONEY, as a candidate for 16 Cochise College District Board Member; 17 MARISOL RENTERIA, as Director of 18 the Cochise County Elections 19 Department; DAVID STEVENS, the 20 Cochise County Recorder; and THE 21 COCHISE COUNTY BOARD OF 22 SUPERVISORS and its members, in their 23 official capacities, 24 25 Defendants/Appellees 26 27</p>	<p>Arizona Supreme Court No. CV-24-0201-AP/EL  Cochise County Superior Court No. CV202400439  Election Nomination Challenge  Opening Brief</p>
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28 **OPENING BRIEF**  
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30 **STATEMENT OF THE CASE**  
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32 1. The Plaintiff is an elector of Cochise County and pursued a civil action  
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34 in the Cochise County Superior Court against Stephanie Money, a candidate for  
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36 Cochise College District Board Member, for the 5th community college  
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38 precinct seat, to preclude Stephanie Money from be placed on the November  
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41 2024 general election ballot.  
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1                   2. In such allegation against Stephanie Money, there were two main  
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3 controversies:  
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5                   A. She did not file a statement of interest; and  
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7                   B. She did not file a financial disclosure statement  
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10                  3. The Defendant Stephanie Money, throughout this civil complaint, has  
11  
12 not once claimed to have filed either a statement of interest nor a financial  
13  
14 disclosure statement.  
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16                  4. The Defendant Stephanie Money stated in open court that the  
17  
18 Plaintiff/Appellant’s claim that Stephanie Money did not file a statement of  
19  
20 interest nor a financial disclosure statement was in fact true.  
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23                  5. At 1 hour, 41 minutes, and 45 seconds of the audio recording from the  
24  
25 trial that was held on 5 August 2024, defendant Stephanie Money said: “He  
26  
27 states that I did not file a financial disclosure form and that I did not file a  
28  
29 statement of interest. This is true.”  
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32                  6. The facts of this case were simple. The trial court judge spent very  
33  
34 little time debating facts and investigating the facts. All Parties agree Stephanie  
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36 Money did not file a statement of interest nor did she file a financial disclosure  
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38 statement. The trial spent most of its time debating law and legal interpretation.  
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7. The trial court dismissed the Appellant/Plaintiff’s civil action, with the opinion that Defendant Stephanie Money was not required to file a statement of interest and was not required to file a financial disclosure statement.

8. The two questions before this Supreme Court are the following:

A. Are community college district board member candidates required to file a statement of interest?

B. Are community college district board member candidates required to file a financial disclosure statement?

9. “college candidate” and “college member” shall hereinafter refer to “community college district board member candidate” and “community college district board member” respectively.

**STATEMENT OF FACTS**

10. All parties agree Defendant Stephanie Money did not file a statement of interest nor a financial disclosure statement.

11. The Defendant Stephanie Money stated in open court that the Plaintiff/Appellant’s claim that Stephanie Money did not file a statement of interest nor a financial disclosure statement was in fact true.

12. At 1 hour, 41 minutes, and 45 seconds of the audio recording from the trial that was held on 5 August 2024, defendant Stephanie Money said: “He

1 states that I did not file a financial disclosure form and that I did not file a  
2  
3 statement of interest. This is true.”  
4

5 13. At 4 minutes, 17 seconds of the audio recording, Plaintiff stated “I  
6  
7 have some answered interrogatories here that say the elections department has  
8  
9 not received any statement of interest or financial disclosure statement.”  
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11

12 14. Marisol Renteria, Cochise County Elections Director was personally  
13  
14 present in the gallery, who would have been able to testify to the facts, if called,  
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16 and was a named defendant in the civil action, and is an “indispensable part[y]  
17  
18 to the action” pursuant to A.R.S. § 16-351(C)(2).  
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21 15. Neither party chose to examine or question the county elections  
22  
23 director during trial.  
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26 16. The facts were obvious, Defendant Stephanie Money in open court  
27  
28 admitted to not turning in a statement of interest, trial judge did not feel the  
29  
30 need to bring up an obvious point, and so Defendant Stephanie Money waived  
31  
32 her right through silence to dispute facts, and additionally admitted in open  
33  
34 court to the facts.  
35  
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37 17. In the Plaintiff’s initial complaint (stamped filed 17 July 2024), in  
38  
39 paragraph 19, which is on Page 4, Plaintiff alleged that Defendant Stephanie  
40  
41 Money was required to have 45 signatures.  
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1 18. Parties have not disputed or even questioned the fact that Defendant  
2  
3 Stephanie needed 45 signatures. At minimum, it is intuitive that Defendant  
4  
5 Stephanie Money needed a non-zero amount of signatures. The Plaintiff was  
6  
7 alleging that all signatures in their entirety were invalid because of the  
8  
9 statement of interest controversy.  
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12 **STATEMENT OF THE ISSUES**  
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15 19. Whether or not ballot-printed college candidates, and in this case,  
16  
17 Defendant/Appellee Stephanie Money, are required to file a statement of  
18  
19 interest “Not later than the date of the first petition signature” pursuant to  
20  
21 A.R.S. § 16-311(H).  
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24 20. Whether or not ballot-printed college candidates, and in this case,  
25  
26 Defendant/Appellee Stephanie Money, are required to file a financial disclosure  
27  
28 statement pursuant to A.R.S. § 16-311(I)(1) and Chapter 3.1 of Title 38.  
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31 **ISSUE: STATEMENT OF INTEREST**  
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34 21. In general, in Arizona, in order to be a ballot-printed candidate, a  
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36 candidate must gather a sufficient number of signatures. If a candidate gathers  
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38 insufficient signatures, the candidate is ineligible to be printed on the ballot and  
39  
40 Arizona’s “sore loser law” (A.R.S. § 16-312) prevents a candidate from  
41  
42 running again in that election cycle. Before a candidate gathers signatures, a  
43  
44 candidate must file a statement of interest. If a candidate never files a statement  
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1 of interest, it is as if that candidate turned in zero signatures. It goes without  
2  
3 citation needed that all races require a non-zero amount of signatures. The  
4  
5 logical conclusion is in order to run for office in Arizona, a filed statement of  
6  
7 interest is required.  
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9  
10 22. A.R.S. § 16-322 details the number of signatures required. In this  
11  
12 brief's examples, federal Congress and college candidate signature  
13  
14 requirements to be ballot-printed are non-zero, meaning for those offices, a  
15  
16 statement of interest is required.  
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19 23. One argument that was presented in favor of Defendant/Appellee was  
20  
21 that, pursuant to A.R.S. § 15-1442(A), the defendant is not required to do  
22  
23 anything but make sure her nominating petitions substantially comply with  
24  
25 A.R.S. § 16-314. This argument fails because the next subsection down,  
26  
27 subsection B of that same section, provides that "Members of the district board  
28  
29 shall be elected at the time and place, and in the manner, of general elections as  
30  
31 provided in title 16."  
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36 24. If all the candidate had to do was print the correct petition sheets and  
37  
38 turn them in to the elections director, candidates could be non-citizens, not able  
39  
40 to speak English, turn in the petition sheets whenever they want even after the  
41  
42 election, turn in zero signatures. At what point do other laws apply?  
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1           25. Looking further into A.R.S. § 16-314, this section does not set a  
2  
3 deadline for college candidates, because subsection A is only for primary  
4  
5 elections. Pursuant to A.R.S. § 15-1442(B), the college member seats are  
6  
7 elected at the general election, not the primary election, so A.R.S. § 16-  
8  
9 314(A)'s deadline is non-applicable. Again, what is the deadline for a college  
10  
11 candidate to file their papers if the only applicable law for college candidates is  
12  
13 A.R.S. § 15-1442(A) and therefore A.R.S. § 16-314?  
14  
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16           26. Returning to A.R.S. § 15-1442(B), the legislature used vague and all-  
17  
18 encompassing language, such as “time and place, and in the manner” and “title  
19  
20 16”. If Appellant had the opportunity to write A.R.S. § 15-1442(B), Appellant  
21  
22 is unsure how else to write “time and place, and in the manner” as more all-  
23  
24 encompassing and more vague language and on top of that, the legislature used  
25  
26 “title 16”, meaning the entirety of title 16. If the legislature wanted to reinvent  
27  
28 election laws or cherry-pick which election laws they wanted to use, they  
29  
30 would have said “as provided in sections 16-xxx, 16-yyy, and 16-zzz” in A.R.S.  
31  
32 § 16-1442(B). Appellant argues that because in A.R.S. § 15-1442(B) the  
33  
34 legislature used vague and all-encompassing language for title 16, it is  
35  
36 autological to understand that the legislature was not intending to “reinvent the  
37  
38 wheel” with election law in Title 15, and preferred election law to primarily  
39  
40 reside in Title 16.  
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1 27. One cannot find the deadline for filing nomination petition papers for  
2 college candidate without reading A.R.S. § 16-311(B): “ANY person desiring to  
3 become a candidate at ANY nonpartisan election...”. Appellant argues again  
4 that the legislature used all-encompassing and vague language a third time,  
5 which is congruent in this case, since A.R.S. § 15-1442(B) points to Title 16,  
6 and A.R.S. § 16-311(B) gives a deadline for “any nonpartisan election”.  
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14 28. Further, in that same section 16-311, in subsection H, it says: “Not  
15 later than the date of the first petition signature on a nomination petition...a  
16 candidate...shall file a statement of interest with the appropriate filing officer  
17 for that office.”. It also further clarifies what the consequence is of not doing  
18 this mandatory act: “Any nomination petition signatures collected before the  
19 date the statement of interest is filed are invalid and subject to challenge.”.  
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28 29. The defendant/appellee argued that she was not required to file a  
29 statement of interest because the county website said she wasn’t required to.  
30 The Plaintiff/Appellant reminded the trial court and hereby again in this court,  
31 that information on the county website is non-binding, because if it were  
32 binding, would give the county website administrator and/or county elections  
33 director a power to usurp the actual Arizona legislature.  
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42 30. There is a legal rumor that “special district candidates are not  
43 required to file a statement of interest, therefore, college candidates are not  
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1 required to file a statement of interest”. The truth is that all ballot-printed  
2  
3 candidates are required to file a statement of interest, with the exception of  
4  
5 “Candidates for elected office for special taxing districts that are established  
6  
7 pursuant to title 48”, as prescribed in A.R.S. § 16-311(H)(1).  
8  
9

10 31. College candidates are created by title 15, not title 48. Therefore, the  
11  
12 exemption from A.R.S. § 16-311(H)(1) is non-applicable to college candidates.  
13  
14 This legal rumor is incorrect.  
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17 32. The Honorable Judge Thorn argued/implied that the Plaintiff could  
18  
19 only succeed in the signature challenge if the nomination petitions circulated  
20  
21 would materially confuse voters, based on Bee v. Day, decided in 2008.  
22  
23 Plaintiff/Appellant disagrees with this.  
24  
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27 33. In Bee v. Day, it was decided in 2008, before the legislature  
28  
29 introduced the statement of interest requirement in 2019. The Supreme Court,  
30  
31 nor the plaintiff, nor the defendant could consider a statement of interest  
32  
33 argument back in 2008.  
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37 34. Further, in Bee v. Day, the appellant Keith Bee was asserting that the  
38  
39 petitions turned in by the candidate failed to include information about an  
40  
41 expired term. Plaintiff Mr. Dalton-Webb in this case was not disputing that  
42  
43 anything confusing to voters was on Defendant Stephanie Money’s petitions  
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45 themselves, but that she did not file a statement of interest. The statement of  
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1 interest is not presented to voters on the street when presented with a  
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3 nomination petition to sign, so it was erroneous to say that filing or not filing a  
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5 statement of interest would confuse voters presented with a statement of  
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7  
8 interest.  
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10 35. The trial judge heavily implied to having done very little research  
11  
12 before presenting, perhaps surprising Plaintiff at trial with Bee v. Day when, at  
13  
14 35 minutes and 0 seconds of the trial audio recording, the trial court judge said:  
15  
16 “I went to my Westlaw account, I typed in substantial compliance with Arizona  
17  
18 election law, and Bee v. Day was the first case that popped up.”  
19  
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21  
22 36. Substantial compliance is not a consideration when filing a statement  
23  
24 of interest. A.R.S. § 16-311(H) is very clear as to the consequence of not filing  
25  
26 a statement of interest: “Any nomination petition signatures collected before  
27  
28 the date the statement of interest is filed are invalid and subject to challenge”.  
29  
30  
31 Nothing was filed.  
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34 37. Trial court and parties went into recess and returned and the  
35  
36 Honorable Judge appeared, to the Plaintiff, to have realized the case was  
37  
38 irrelevant after Plaintiff presented that Bee v. Day was decided in 2008 and the  
39  
40 statement of interest requirement was enacted in 2019 and confusion was  
41  
42 cleared up.  
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1 38. The trial judge argued that “time and place, and in the manner” from  
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3 A.R.S. § 15-1442(B) does not include a statement of interest.

4  
5 Plaintiff/Appellant disagrees.  
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7  
8 39. Interestingly, the federal constitution uses the words “Times, Places  
9  
10 and Manner” when giving the Arizona legislature authority to enact laws  
11  
12 regarding “holding Elections for Senators and Representatives” (Article 1,  
13  
14 Section 4, Clause 1). Arizona’s election laws over federal congress candidates  
15  
16 are restricted to “Times, Places and Manner”. It appears that in order to run for  
17  
18 federal congress in Arizona as a ballot-printed candidate, it is required to file a  
19  
20 statement of interest.  
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23  
24 40. To say that a college candidate is not required to file a statement of  
25  
26 interest would also say that it is unconstitutional to require a federal congress  
27  
28 candidate to file a statement of interest, as both A.R.S. § 15-1442 and Art 1 § 4,  
29  
30 Clause 1 of the federal constitution both say “time, place, and manner”.  
31  
32

33  
34 41. It appears that the legislature interpreted “Times, Places and Manner”  
35  
36 authority from the federal constitution to include authority to require federal  
37  
38 congress candidates to file a statement of interest. Thereby, in the legislature’s  
39  
40 opinion, “manner” would include statement of interest.  
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43 42. Appellant argues that “time and place, and in the manner, of general  
44  
45 elections as provided in title 16” from A.R.S. § 15-1442(B) includes the  
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1 statement of interest requirement from A.R.S. § 16-311(H) because “manner”  
2  
3 includes a statement of interest within the legislature’s interpretation of  
4  
5 “Manner” from the federal constitution when giving themselves power to  
6  
7 regulate federal congress candidates in Arizona.  
8

9  
10 43. If Stephanie Money, a college candidate, is required to turn in 45  
11  
12 signatures, pursuant to A.R.S. § 16-322(A)(5) and never turns in a statement of  
13  
14 interest, even if she turned in signatures, it would be as if she turned in zero  
15  
16 VALID signatures, pursuant to A.R.S. § 16-311(H), and if she turned in zero  
17  
18 valid signatures, pursuant to A.R.S. § 16-322(A)(5), she would fail to meet the  
19  
20 requisite signatures (in this case 45), and therefore, be disqualified to be printed  
21  
22 on the ballot.  
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25  
26 44. This statement of interest controversy alone would disqualify  
27  
28 Stephanie Money from being printed on the ballot for college member.  
29  
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31 45. The Plaintiff/Appellant, in his capacity as a qualified elector, was  
32  
33 harmed, as the clear legislative intent of requiring a statement of interest in  
34  
35 A.R.S. § 16-311(H) was for the public to be informed when candidates are out  
36  
37 gathering signatures, so that when candidates turn in their signatures to then be  
38  
39 placed on the ballot, it is no surprise to the public that candidates were  
40  
41 spending resources gathering signatures, prior to nomination papers being  
42  
43 turned in. Defendant/Appellee harmed Plaintiff/Appellant by her surprise  
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1 nomination filing, with no warning, which the statement of interest would have  
2  
3 given the public such warning.  
4

5 46. This appeal has significant public and statewide interest, as clearly,  
6  
7 Cochise County (including county attorney’s office, county elections  
8  
9 department, and a county judge) believes a statement of interest is not required.  
10  
11 However, Pima County has a different opinion. On their website<sup>1</sup>, they say:  
12  
13 “Pima Community College candidates are registered voters running in one of  
14  
15 five districts to serve as a member of the Governing Board, which is not based  
16  
17 on political party affiliation. They are required to file a Statement of Interest.”.  
18  
19  
20  
21 Two counties have different opinions on the same state law.  
22

23  
24 **ISSUE: FINANCIAL DISCLOSURE STATEMENT**  
25

26 47. As stated above, without A.R.S. § 16-311(B), we have no deadline  
27  
28 for college candidates to file their papers. Without it, college candidates could  
29  
30 turn in their papers whenever they wanted.  
31

32  
33 48. In that same A.R.S. § 16-311 where we get the deadline to file a  
34  
35 nomination paper, in subsection I, it says: “The filing officer shall not accept  
36  
37 the nomination paper of a candidate for state or local office unless the person  
38  
39 provides or has provided all of the following” followed by, in paragraph 1:  
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<sup>1</sup> <https://www.pima.gov/678/Candidates>  
48

1 “The financial disclosure statement as prescribed for candidates for that  
2  
3 office.”  
4

5 49. Pursuant to A.R.S. § 15-1442(B), college candidates are in the  
6  
7 general election. Pursuant to A.R.S. § 16-211, the general election is on 5  
8  
9 November 2024. Pursuant to A.R.S. § 16-311(B), the deadline to turn in a  
10  
11 nomination paper is 8 July 2024.  
12  
13

14 50. Pursuant to A.R.S. § 16-311(I), a financial disclosure statement is  
15  
16 required in order to file a nomination paper. The consequence of not filing a  
17  
18 financial disclosure statement with the county elections director is that the  
19  
20 county elections director “shall not accept the nomination paper”.  
21  
22

23 51. Plaintiff/Appellant asserts the legal fiction that Stephanie Money  
24  
25 never turned in a nomination paper, as the elections director should not have  
26  
27 accepted the nomination paper, as the financial disclosure statement was not  
28  
29 turned in.  
30  
31

32 52. In the opinion of the Arizona Secretary of State, college candidates  
33  
34 are required to file a financial disclosure statement.  
35  
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37 53. In the Arizona Secretary of State’s handbook “Financial Disclosure –  
38  
39 A Guide for Completing Financial Disclosure Statements” (2023 ver. 2 - Ver.  
40  
41 Release Date December 08, 2023)<sup>2</sup>, it states:  
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46 2 [https://azsos.gov/sites/default/files/docs/  
47 2024\\_Financial\\_Disclosure\\_Handbook.pdf](https://azsos.gov/sites/default/files/docs/2024_Financial_Disclosure_Handbook.pdf)  
48

1 A. on page 2, it says “Local candidates (other than precinct  
2  
3 committeemen) are also required to file a Financial Disclosure Statement  
4  
5 with the appropriate local filing officer”.  
6  
7

8 B. on page 3, it says, “A candidate for elective office (other than a  
9  
10 candidate for federal office or precinct committeeman) must file a  
11  
12 Financial Disclosure Statement at the same time he or she files a  
13  
14 nomination paper.”  
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17 54. In the Secretary of State’s Financial Disclosure handbook, on page 4  
18  
19 where it says: “A local candidate (other than a candidate for precinct  
20  
21 committeeman) must file a Financial Disclosure Statement with the officer in  
22  
23 charge of elections with whom nomination papers must be filed for the office in  
24  
25 question.<sup>23</sup>”, under footnote 23, it cites A.R.S. § 15-1442(A) as one of the  
26  
27 authorities to require a financial disclosure statement, directly stating that this  
28  
29 financial disclosure statement is required of college candidates.  
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33 55. Defendant Stephanie Money argued that she was not required to file  
34  
35 a financial disclosure statement because the county website said it was not  
36  
37 required.  
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40 56. Again, the plaintiff/appellant hereby reminds this court, that  
41  
42 information on the county website is non-binding, because if it were binding,  
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1 would give the county website administrator and/or county elections director a  
2  
3 power to usurp the actual Arizona legislature.  
4

5 57. Defendant Stephanie Money argued that she was not required to file  
6  
7 a financial disclosure statement because she did not receive any campaign  
8  
9 funds.  
10

11 58. Plaintiff/Appellant asserted and re-asserts that campaign finance  
12  
13 reporting and financial disclosure statements are two different things.  
14  
15 Campaign finance reports donors. Financial disclosure statements report the  
16  
17 candidate's personal financial life.  
18  
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21 59. During trial, at 2 hours, 11 minutes, 22 seconds of the audio of the  
22  
23 trial, after the judge allowed arguments to be presented, the trial judge stated he  
24  
25 believed that because Stephanie Money said she hasn't exceeded the campaign  
26  
27 finance reporting threshold, and Plaintiff didn't present any evidence that the  
28  
29 Stephanie Money exceeded the campaign finance reporting threshold, that she  
30  
31 isn't required to file a financial disclosure statement.  
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35 60. Appellant re-asserts that campaign finance and financial disclosure  
36  
37 statements are two different things.  
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40 61. Plaintiff/Appellant asserts that because Defendant Stephanie Money  
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42 did not file a financial disclosure statement as required by A.R.S. § 16-311(I)  
43  
44 (1), and pursuant to A.R.S. § 16-311(I), "The filing officer shall not accept the  
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1           64. The Appellant is unsure if ballots have already been printed. By the  
2  
3 time the Arizona Supreme Court decides on the matter, votes may already be  
4  
5 cast.  
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7  
8           65. In the Plaintiff's initial complaint in the lower court, Plaintiff  
9  
10 requested that Defendants, including county elections director and county  
11  
12 recorder, be prevented "from printing or preparing a publicity pamphlet or a  
13  
14 General Election ballot".  
15

16  
17           66. Plaintiff/Appellant contends that the ballots have/will already be  
18  
19 printed.  
20

21  
22           67. Plaintiff/Appellant asserts that alternative relief/remedies would need  
23  
24 to be sought.  
25

26  
27           68. Plaintiff, in his initial complaint in the lower court, stated in his  
28  
29 requested relief: "Awarding the plaintiff all other relief as is just, proper, or  
30  
31 equitable under the facts and circumstances of this case."  
32

33  
34           69. As a potential remedy for this court to give to the Appellant, is to  
35  
36 nullify all votes cast towards Stephanie Money, as her standing on the ballot  
37  
38 was solely because she collected sufficient signatures and fulfilled all other  
39  
40 requirements to be printed on the ballot. Appellant asserts that she collected  
41  
42 insufficient signatures, therefore, did not have standing to be printed on the  
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1 ballot, therefore, should not have votes counted towards her, therefore, is not  
2  
3 eligible to obtain office.  
4

5 70. From the trial in the lower court, all Parties agree that Stephanie  
6  
7 Money did not file a statement of interest and a financial disclosure statement.  
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9

10 71. From the trial, it is undisputed that the Defendant needed 45 valid  
11  
12 signatures, pursuant to A.R.S. § 16-322(A)(5). Notwithstanding, it is obvious  
13  
14 that the signature requirement would be non-zero.  
15  
16

17 72. Appellant requests this Court to rule that Appellee/Defendant is  
18  
19 required to file a statement of interest “Not later than the date of the first  
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21 petition signature on a nomination petition” pursuant to A.R.S. § 16-311.  
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24 73. Further, Appellant requests this Court to rule that since  
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26 Appellee/Defendant is required to file a statement of interest, and never did,  
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28 and the deadline was 8 July 2024, and we are past the deadline, that all  
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30 signatures turned in were invalid.  
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33 74. Further Appellant requests this Court to rule that since  
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35 Appellee/Defendant turned in zero valid signatures, which is below the 45 valid  
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37 signatures, as required by A.R.S. § 16-322(A)(5), that the Appellee/Defendant  
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39 is/was not eligible to be placed on the ballot.  
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75. Further Appellant requests this Court to rule that Appellee/Defendant was required to turn in a financial disclosure statement, pursuant to A.R.S. § 16-311(I)(1).

76. Further Appellant requests this Court to rule that since Appellee/Defendant did not turn in a financial disclosure statement, the county elections director erred in accepting Appellee/Defendant's nomination paper.

77. Further Appellant requests this Court to rule that Appellee/Defendant never turned in a nomination paper nunc pro tunc.

78. Further Appellant requests this Court to rule that votes are not to be officially canvassed in favor of Stephanie Money for this election cycle.

79. Further Appellant requests this Court to rule that Stephanie Money is not to take office from a consequence of being a candidate on the ballot.

**SERVICE OF PROCESS**

A copy of this has been sent to the following via e-mail:

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(as ordered by Hon. Justice Robert Brutinel)

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bisbeesteph@yahoo.com  
(Defendant/Appellee)

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**SIGNATURE**

I, Eli Dalton-Webb, have read the foregoing Opening Brief and am familiar with the facts and circumstances as alleged therein, and hereby state, under penalty of perjury, that the allegations contained therein are true and correct to the best of my knowledge, information, and belief.

Dated this 26th day of September, 2024.



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Eli Dalton-Webb