



ORIGINAL

IN THE SUPREME COURT OF THE STATE OF OKLAHOMA

**INDEPENDENT SCHOOL DISTRICT No. 12 OF
OKLAHOMA COUNTY, COMMONLY KNOWN AS
EDMOND PUBLIC SCHOOLS,**

Petitioner,

v.

**STATE OF OKLAHOMA, *EX. REL.* STATE BOARD OF
EDUCATION,
RYAN WALTERS, IN HIS CAPACITY AS STATE
SUPERINTENDENT OF PUBLIC INSTRUCTION
AND
PRESIDENT OF THE STATE BOARD OF
EDUCATION, AND
STATE DEPARTMENT OF EDUCATION,**

Respondents.

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STATE OF OKLAHOMA**

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**RESPONSE TO PETITIONERS' APPLICATION TO ASSUME ORIGINAL
JURISDICTION AND PETITION FOR WRIT OF PROHIBITION AND
DECLARATORY AND INJUNCTIVE RELIEF**

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RYAN WALTERS AND STATE DEPARTMENT OF
EDUCATION**

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INTRODUCTION

Under the guise of an Application to Assume Original Jurisdiction (“Application”), the Petitioner seeks to turn the Oklahoma Supreme Court into a library committee, poring over literary awards and book reviews. In contrast, Respondents’ brief shall intentionally ignore the merits and flaws of the two books cited in the Oklahoma State Department of Education’s (“SDE”) letter and complained of by the Petitioner. Rather, Respondents shall focus on the *legal* issues before the Court, *to wit*, whether SDE validly promulgated OAC 210:35-3-121(b), 121.1, 126(b), and 128 (the “Rules”) and whether SDE has the duty and authority to enforce the same.

The Application seeks a writ of prohibition preventing Respondents from enforcing the Rules, an order staying a meeting of the State Board of Education, and an order declaring that said Rules are invalid under Oklahoma law. Since the filing of Petitioner’s Application, the first two of the three remedies sought therefrom have become moot. Due to an agreement between Petitioner and Respondents, memorialized in the *Notice of Joint Stipulation to Stay Proceedings & Motion to Strike Hearing* submitted to the Court on February 28, 2024, Petitioner’s Application is no longer urgent or in pressing need for an immediate decision. Therefore, Respondents respectfully urge the Court to deny the request for assumption of original jurisdiction and allow Petitioners to appropriately file a new Petition in a district court of competent jurisdiction or otherwise abandon their pursuit.

THE PARTIES

Petitioner, Independent School District No. 12 of Oklahoma County, commonly known as Edmond Public Schools (“Petitioner” or the “District”) is a creature of state statute, given the authority by and through its board to, *inter alia*, “(m)ake rules, ***not inconsistent with the***

law or rules of the State Board of Education, governing the board and the school system of the district, OKLA. STAT. tit. 70, § 5-117 (emphasis added).

Respondent, Ryan Walters, is the Superintendent of Public Instruction, an Executive Office enumerated by the Oklahoma Constitution. Okla. Const. Art. VI, § 1(A). Respondent, the State Board of Education is likewise created by the Oklahoma Constitution, which mandates that the Superintendent of Public Instruction be President of the Board. Okla. Const. Art. XIII, §5. “The State Department of Education is that department of the state government in which the agencies created or authorized by the Constitution and Legislature are placed and charged with the responsibility of determining the policies and directing the administration and supervision of the public school system of the state.” OKLA. STAT. tit. 70, § 1-105(A).

The Administrative Procedures Act (“APA”) governs the promulgation of rules by state agencies. OKLA. STAT. tit. 75, § 250 *et seq.* “Agency” is defined in the APA as including “any constitutionally or statutorily created state board, bureau, commission, office, authority, public trust in which the state is a beneficiary, or interstate commission,” except the Legislature and the courts. OKLA. STAT. tit. 75, § 250.3(3).

ARGUMENT & AUTHORITIES

I. Petitioner has not met the burden for invocation of original jurisdiction.

A. Legal Standard: Court has the Discretion to Assume Jurisdiction but Typically Reserves Doing So Except for in Extraordinary Circumstances.

This Court has discretion in determining whether to assume jurisdiction over a controversy in which both this Court and the district courts have concurrent jurisdiction. *Oklahoma Call for Reprod. Just. v. Drummond*, 2023 OK 24, ¶ 2, 526 P.3d 1123, 1127. However, assumption of original jurisdiction by the Oklahoma Supreme Court is reserved for extraordinary circumstances and is disfavored in the law. The purpose of such assumption is

to address emergent situations where irreparable harm would likely ensue from the time spent in the standard litigation process. “A fairly consistent theme running through most of (the Court’s) cases where original jurisdiction has been assumed has been that the matter must be affected with the public interest *and there must be some urgency* or pressing need for an early determination of the matter.” *Keating v. Johnson*, 1996 OK 61, ¶ 10, 918 P.2d 51, 56. (emphasis added).

“The original jurisdiction of the Supreme Court, ... is intended primarily as a ‘stand by’ service which it will exercise only when, from the exigencies of the case, great injury will be done by its refusal so to do. A different rule would so flood this court with original actions as to destroy its efficiency as an appellate court.” *Id* at ¶ 9. “Also, it is the **rare** case that will be entertained on original jurisdiction that requests declaratory relief.” *Edmondson v. Pearce*, 2004 OK 23, ¶ 11, 91 P.3d 605, 614, as corrected (July 28, 2004) (emphasis in the original).

B. Petitioner Fails to Establish the Requisite Element of Urgency and its Claimed Harms are Purely Speculative.

As noted above, the agreed stay entered into by the Petitioner and the Respondents extinguish the purported urgency of this matter. Respondents have agreed not to enforce the provisions of the Rules until ruled upon by a court of competent jurisdiction. This has rendered moot the Petition for Prohibition as well as any claim for injunctive relief. All that remains for this Court to decide is whether (i) to assume original jurisdiction and (ii) whether to provide declaratory relief. Therefore, the urgency requirement of *Keating, supra*, is not met.

Aside from the effects of the stay on Petitioner’s claim of urgency, the purported harms warned of by Petitioner are purely speculative. Petitioner’s request for assumption of original jurisdiction is analogous to a request for injunctive relief in that each must establish a threat of imminent harm, indeed “great injury” per *Keating* at ¶ 9. The nature of such injury has been

addressed by this Court. “The need for an injunction must be shown by clear and convincing evidence, and the nature of the injury must not be speculative in nature.” *Daffin v. State ex rel. Oklahoma Dep’t of Mines*, 2011 OK 22, ¶ 7, 251 P.3d 741, 745. Yet, speculation is all the Petitioner offers.

Petitioner claims that if it complies with the directives of the Board, then it is at risk of being sued by somebody, at some time, somewhere in the future. Such claims are so speculative and uncertain, no true “emergency” could exist. Perhaps knowing such speculation is insufficient, Petitioner next claims that removing the books in question would be in violation of its students’ First Amendment rights. The United States Supreme Court’s jurisprudence regarding the First Amendment has gone through various permutations and has dealt with many issues, but never has it found a positive right to have access to every work of prose in a high school library on demand. Petitioner’s argument boils down to claiming that if it cannot use its limited resources to place two individual books on the shelf, it is in grave danger of being sued by a mystery student. Even if true, such hyperbole does not provide a basis for an emergency sufficient for the Court to assume original jurisdiction.

C. Petitioner’s Request Seeks to Turn the Supreme Court into a Trier of Fact.

Despite the fact that Petitioner failed to exhaust its administrative remedies, it seeks to have the Court rule on the validity of the Rules *and any prospective enforcement of the same* in summary fashion, without the benefit of any court weighing evidence and hearing testimony. Rather, Petitioner seeks to introduce hearsay and slanted news coverage to distract from the Board’s established authority to promulgate the Rules at issue and the Board’s proper method of steering the Rules through the administrative rules process.

There is no record for the Court to consider in this case. Petitioner would have the Court wade through hours of videos of State Board meetings and presumably weigh the context, veracity, relevance of not only those meetings, but also book awards, newspaper articles, and even a speech by the former First Lady of the United States! Petitioner is silent as to how the Court is to perform its role as trier of fact. Are witnesses to be called? Is discovery to be allowed before trial?¹

At the root of Petitioner's complaint is that its accreditation potentially could be in danger were the State Board allowed to enforce the Rules. After making the factual allegation that "SDE has threatened District with Board action to lower District's accreditation" without citation of any evidence whatsoever, Petitioner then engages in a slippery slope argument, asserting that any downgrading of accreditation status is merely a precursor to total withdrawal (Petitioner's Brief, pp. 1, 6). As there is no record, there is no indication as to who made the alleged threat on behalf of the SDE nor the nature and extent of such communication. Rather than contesting the *application* of the Rules through the normal channels of administrative procedure, or even availing itself of a District Court well equipped to conduct a trial on the merits of its claims, Petitioner improperly brought this action before the highest court of our state at a stage far too inchoate for consideration.

¹ In addition to the videos and articles cited by Petitioner in an attempt to introduce irrelevant evidence to provide color, it points to one of the thousands of pieces of legislation proposed in the current Legislature, HB 3942, seeking to strip certain powers from the Board. Since Petitioner wrote its brief, HB 3942 has not even received a hearing in committee and is now dead pursuant to rules. <http://www.oklegislature.gov/BillInfo.aspx?Bill=hb3942&Session=2400> (last visited Mar. 15, 2024)

II. The Board's Rules were promulgated in accordance with the Administrative Procedures Act

A. The Administrative Procedures Act's Method for Promulgating and Approving Rules.

If this Court were to somehow retain original jurisdiction, the sole remaining issue before the Court is whether the Board (and indeed the Legislature and the Governor) complied with the Administrative Procedures Act (the "APA") in promulgating the Rules. The APA's procedure for permanent rulemaking provides for agencies to submit their proposed rules to the Governor and the Legislature. OKLA. STAT. tit. 75, § 303.1. The Legislature then has the opportunity to approve, disapprove, or take no action on a given rule. OKLA. STAT. tit. 75, § 308.² In the event the Legislature takes no action on a rule, the Governor may approve or disapprove such rule. OKLA. STAT. tit. 75, § 308.3.

B. Senate Joint Resolution 22 Neither Approved Nor Disapproved the Rules, thereby Shifting the Authority to Approve to the Governor.

In bold type on page 4 of its Application, Petitioner asserts an inaccuracy fatal to its position, namely that the Legislature "**disapproved (the Rules) by joint resolution.**" Contrary to Petitioner's assertion, the Legislature manifestly *did not* disapprove of the rules. In fact, Senate Joint Resolution 22 ("SJR 22") establishes three categories of rules which were proposed on or before April 1, 2023. The first are those which are approved, namely all such proposed rules other than those exempted from the category of approval, in this case, the Rules at issue here as well as some rules promulgated by the Oklahoma Health Care Authority (the "OHCA rules"³).

² Contrary to Petitioner's assertion, the Legislature has failed to pass a joint resolution either approving or disapproving proposed rules in numerous legislative sessions.

³ The OHCA rules were *disapproved* by the Governor on June 23, 2023.

The second category are those rules disapproved by the Legislature. SJR 22 disapproved rules by six state agencies in Section 1, Subsections 1-6. The third category, are rules on which no action was taken by the Legislature. The distinction between the second and third category is made apparent by the lack of overlap in the language in SJR 22. That is to say, none of the rules exempted from the approved category are listed in the list of disapproved rules. Likewise, none of the rules listed in the disapproved category are mentioned in the list of exempted rules in the approved category.

For Petitioner's reading of the APA to be operative, the Legislature would be forced to list, section by section, each rule to be approved each year. As such a detailed list would be unwieldy, the Legislature has chosen instead to give blanket approval to all rules proposed on or before a certain date and *exempting* those on which it decides to take no action. According to Petitioner, the Governor's ability to approve or disapprove of rules not subject to a joint resolution pursuant to OKLA. STAT. tit. 75, § 308.3 would occur only when *no joint resolution* were passed at all. This has never been the law.

The correct reading of the procedure is also the one that gives the Legislature the most latitude. As noted above, the Legislature has three options: approve, disapprove, or take no action (thereby shifting the decision to the Governor). In consideration of the rules considered by the 2023 Regular Session, the Legislature approved the vast bulk of them, disapproved six sets, and took no action on two. Thereafter, the Governor exercised his authority to approve one set (the Rules at issue) and disapproved another (the OHCA rules).

"Elementary rules of statutory interpretation require (the Court) to avoid any statutory construction which would render any part of a statute superfluous or useless." *Nesbitt v. State*, 2011 OK CR 19, ¶ 20, 255 P.3d 435, 440. Petitioner's reading of the procedure would make

redundant not only the list of six sets of rules contained in SJR 22 as disapproved, but also the disapproval of the OHCA rules by the Governor in July of that year. Further, such reading would deprive the Legislature of a valuable tool: inaction. For these reasons, Petitioner's unique interpretation of OKLA. STAT. tit. 75, § 308.3 should be rejected.

This analysis demonstrates the inherent fallacy in Petitioner's complaint that the Board could run amok and "make *any* rule it claims is intended to ensure the opportunity for an excellent education..." (Petitioner's Brief, p. 12). Were the Board to roam so far afield, the established procedures allow *each* the Legislature and the Governor to wield a veto over such actions. Regarding the Rules at issue, the Legislature declined to wield its veto and the Governor affirmatively affixed his imprimatur.

III. The Board Possessed Sufficient Authority to Promulgate the Rules

A. Authority and Duties of the Board of Education.

The crux of Petitioner's demand from the Court is that they be free from any supervision by the SDE. Petitioner goes to great lengths, with question-begging rhetoric concerning "censorship" to aver that the Board lacks authority to alter accreditation status, but it studiously avoids the last sentence in the governing statute: "(n)othing herein shall be construed as prohibiting the withdrawing or denial of accreditation for failure to meet requirements as elsewhere provided by law." OKLA. STAT. tit. 70, § 3-104.3(B). The District's failure to meet the requirements of Section 11-201 as clarified by the Rules, is the foundation of all prospective action against it by the Board.

As noted above, the Board of Education is established by the Oklahoma Constitution. This Court has held, "(t)he Constitutional provision vesting the power of supervision of

instruction in the Board of Education is not a limitation, but a grant of power.” *Sch. Dist. No. 25 of Woods Cnty. v. Hodge*, 1947 OK 220, ¶ 24, 183 P.2d 575, 583.

The powers and duties of the State Board of Education are further set forth in statute, as follows:

A. The supervision of the public school system of Oklahoma shall be vested in the State Board of Education and, **subject to limitations otherwise provided by law**, the State Board of Education shall:

1. Adopt policies and **make rules for the operation of the public school system** of the state;

...

7. **Promulgate rules governing** the classification, inspection, supervision, and **accrediting of all** public nursery, kindergarten, elementary and **secondary schools**, and on-site educational services provided by public school districts or state-accredited private schools in partial hospitalization programs, day treatment programs, and day hospital programs as defined in this act for persons between the ages of three (3) and twenty-one (21) years of age in the state. However, no school shall be denied accreditation solely on the basis of average daily attendance.

...

20. Have authority and is **hereby required to perform all duties necessary to the administration of the public school system in Oklahoma as specified in the Oklahoma School Code; and, in addition thereto, those duties not specifically mentioned herein if not delegated by law to any other agency or official; ...**

OKLA. STAT. tit. 70, § 3-104 (emphasis added)

The language in paragraph 20 regarding the requirement to “perform all duties necessary” is especially pertinent. “A statute creating an express power in the nature of an express affirmative duty normally creates an implied power necessary to fulfill that express affirmative duty.” *W. Heights Indep. Sch. Dist. No. I-41 of Oklahoma Cnty. v. State ex rel. Oklahoma State Dep't of Educ.*, 2022 OK 79, ¶ 32, 518 P.3d 531, 543. Likewise, “(a) state administrative agency has implied powers in addition to the powers expressly granted when such implied powers are necessary for the due and efficient exercise of the express powers.”

Id. at ¶ 32.

In the context of a school district challenging the Board's authority to enforce the School Code with respect to accreditation status, this Court held, "Oklahoma law is clear that (the Board and the Superintendent) have statutory and constitutional authority to take the actions they have, follow the process they have... To rule otherwise would render the State Board's role superfluous." *Id.*, at ¶ 76.

An integral part of the School Code (acknowledged by Petitioner in its Application and which the Board is *required* to administer per OKLA. STAT. tit. 70, § 3-104(A)(20) is OKLA. STAT. tit. 70, § 11-201, which provides:

As school library media center resources are finite, the library media program shall be reflective of the community standards for the population the library media center serves when acquiring an age-appropriate collection of print materials, nonprint materials, multimedia resources, equipment, and supplies adequate in quality and quantity to meet the needs of students in all areas of the school library media program.

"An additional role of a school superintendent is that of implementing a public policy which has been statutorily enacted with a State Board possessing a role supervising a local school district's (and superintendent's) implementation." *W. Heights Indep. Sch. Dist. No. I-41 of Oklahoma Cnty.*, 2022 OK 79, ¶ 79, 518 P.3d 531, 555. Therefore, as this Court has held, it is Petitioner's role to implement the statutory policy contained in Section 11-201 and the State Board possesses a supervisory role to ensure implementation.

B. The Attorney General's Opinion Misconstrues relevant Statutes and Precedent.

The Attorney General, in *2023 OK AG 3*, asserts that "(a)ny rule promulgated only on the general 'powers and duties' within section 70 O.S. § 3-104 is invalid and may not be enforced by the State Department of Education or the Board." Respectfully, the Attorney General's opinion is ill-founded in a number of respects. First, it rests on a prior Attorney

General’s Opinion, *2020 OK AG 13*, which rightfully found that a rule passed relying on Section 3-104 could not *directly conflict with a statute on point*. In *2020 OK AG 13*, the prior Superintendent of Public Instruction was seeking to add additional terms to the express language of a statute creating the Lindsey Nicole Henry Scholarship. The then Attorney General noted the rules promulgated by the Department in reliance upon Section 3-104 were invalid because the statute in question “*explicitly prohibit(ed)* regulations that exceeded the express statutory criteria...” *Id.* at ¶ 15 (emphasis in original). There simply is no express statute prohibiting the Board from exercising oversight concerning a district’s compliance with OKLA. STAT. tit. 70, § 11-201, i.e. age-appropriate library content reflecting community standards.

Further, *2023 OK AG 3*, extrapolates from the prior opinion in ways contrary to Oklahoma law. The Attorney General’s citation of OKLA. STAT. tit. 70, § 3-104(A)(20) is simply inaccurate as it has omitted relevant language contained in the statute. For ease of reading, the language analyzed by the Attorney General is reproduced as follows in plain type with the omitted language in italics:

20. Have authority and is hereby required to perform all duties necessary to the administration of the public school system in Oklahoma as specified in the Oklahoma School Code; and, in addition thereto, those duties not specifically mentioned herein if not delegated by law to any other agency or official;

Perhaps if the only language in the statute were that cited by the Attorney General, the analysis would be valid; however, the lacking language is vital. As examined above, the imposition of a duty on the Board by the phrase “hereby required to” creates an “implied power necessary to fulfill that express affirmative duty.” *W. Heights Indep. Sch. Dist. No. I-41 of Oklahoma Cnty.* at ¶ 32.

Further, the omitted language at the end of paragraph 20 in the statute uses the broadest possible language to delegate authority to the Board. The only exception is where authority has been delegated to other agencies and officials by law. Petitioner makes no claim in its brief that the power to supervise the age-appropriate content of school libraries has been put under the authority of another such agency.⁴

Additionally, the Attorney General opinion ignores historical precedent and would eviscerate a plethora of valid and existing rules. The accreditation rule at issue in this case is not the first time that the Board has passed a rule under the authority of OKLA. STAT. tit. 70, § 3-104. The Board has done so on at least 22 separate occasions in the last two years either alone or in concert with another statute without specific rule-making authority. Several rules like OAC 210:1-5-6 cite only OKLA. STAT. tit. 70, § 3-104. Each of these rules were approved by the Legislature and the Governor. The most recent rule that was passed in this way was OAC 210:10-2-1 (Parents' rights concerning their minor children), which was approved by the Legislature on July 07, 2023, three months after the Attorney General issued his opinion.

Given the obvious animus exhibited against the present Superintendent by the Petitioner in its brief with its gratuitous *ad hominem* remarks, the Petitioner may not find this history compelling. However, the historical rule-making authority of the Board based on §3-104 does not stop there. As far back as at least **1993** the Board has continuously relied solely upon its authority under OKLA. STAT. tit. 70, § 3-104 to promulgate its rules.⁵ Again and again, the Legislature has approved the rules so promulgated. Perhaps the most striking is OAC 210:20-9-172 which through 43 subsections ranging from Art Education to Computer Science,

⁴ Furthermore, *2023 OK AG 3* includes *no* analysis of OKLA. STAT. tit. 70, § 11-201 concerning the proper use of library media center resources.

establishes the competencies for licensure and certification of teachers. Last updated in 2018, this rule was added in 1997. The cited authority? OKLA. STAT. tit. 70, § 3-104.⁶

Never once, prior to the Attorney General opinion, has any school district, Board, Legislature, or Governor ever asserted the novel position by our respected Attorney General in *2023 OK AG 3*. Moreover, “while a published Attorney General Opinion may be persuasive authority for a court, courts are not bound by the Opinion of the Attorney General.” *Edwards v. Bd. of Cnty. Comm'rs of Canadian Cnty.*, 2015 OK 58, ¶ 15, 378 P.3d 54, 60. This Court’s precedents, not the least of which, *W. Heights Indep. Sch. Dist. No. I-41 of Oklahoma Cnty.*, *supra* (decided unanimously) are fundamentally at odds with the Attorney General’s Opinion contained in *2023 OK AG 3*. This Court favorably quoted the trial court as follows: “Pursuant to 70 O.S. §§ 1-105 and 3-104, OSDE has the authority to annex, deny accreditation, place on probation and take any other action on the operation of the District.” *W. Heights Indep. Sch. Dist. No. I-41 of Oklahoma Cnty. v. State ex rel. Oklahoma State Dep’t of Educ.*, 2022 OK 79, ¶ 76, 518 P.3d 531, 553. Accordingly, even this Court’s previous rulings are at odds with the new Attorney General opinion.

Were this Court to defer to the judgment of the Attorney General in this matter, the authority granted by the Legislature would effectively be stripped of the Department of Education. Upholding *2023 OK AG 3* would not only impinge upon the Rules at issue

⁶ See also, OAC 210:1-5-6 (2022); 210:10-1-3 (2019); 210:10-1-5 (2018); 210:10-1-6 (2000); 210:10-1-10 (2024); 210:10-1-11 (2024); 210:10-3-40 (2019); 210:15-3-184 (2021); 210:15-35-1 (2023); 210:15-35-2 (2023); 210:20-1-2 (2019); 210:20-9-8 (1993); 210:20-9-96 (2020); 210:20-9-172 (2018); 210:20-18-1 (2017); 210:20-29-5 (2017); 210:25-3-4 (2020); 210:35-3-121 (2023); 210:35-3-121.1 (2023); 210:35-3-126 (2023); 210:35-3-128 (2023); 210:35-23-2 (2020).

concerning library standards, but also would eviscerate rules put in place under Superintendents representing the entire political spectrum for at least the past 30 years.

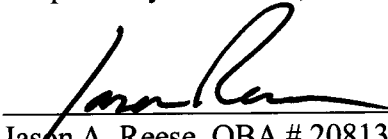
CONCLUSION

Petitioner has brought the wrong action at the wrong time in the wrong court. The action is mistaken because the Rules passed by the Board of Education were well within the purview of its authority and according to established procedures. The timing is inappropriate as no harm has accrued to the Petitioner or any other school district in this state. The choice of court is flawed for the related reason that the requisite element of urgency. Petitioner improperly attempts to turn the Oklahoma Supreme Court into a trial court, and administrative tribunal, and a library committee.

Further, due to its misunderstanding of the joint resolution passed by the Oklahoma Senate and House of Representatives and relied upon by the Governor, the Petitioner claims that the Rules were improperly implemented pursuant to the Administrative Procedures Act. Finally, Petitioner's reliance upon a novel Attorney General's opinion would destabilize the entire edifice of the administrative rules which have provided structure to the common schools of this state for decades.

In light of these manifold deficiencies in Petitioner's Application to Assume Original Jurisdiction & Petition for Writ of Prohibition & Declaratory & Injunctive Relief, Respondents respectfully request that this Court find that Oklahoma Administrative Code Rules 210:35-3-121(b), 121.1, 126(b), and 128, were validly promulgated under the established authority of the Board of Education and that *2023 OK AG 3* is not binding on Respondents. In the alternative, Respondents would request that this Court dismiss these proceedings and deny assumption of original jurisdiction.

Respectfully submitted,



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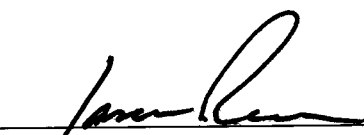
CERTIFICATE OF MAILING

This is to certify that on March 15th, 2024, a true and correct copy of the above and foregoing was mailed to the below individuals:

State Board of Education
Oliver Hodge Building
2500 N. Lincoln Blvd.
Oklahoma City, OK 73105
Respondents

The Honorable Gentner Drummond
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