IN THE SUPREME COURT, STATE OF WYOMING

MEGAN DEGENFELDER, in her official capacity as Wyoming Superintendent of Public Instruction; CURTIS E. MEIER, JR., in his official capacity as Wyoming State Treasurer; and STATE OF WYOMING,

Appellants
(Defendants),

v.

WYOMING EDUCATION ASSOCIATION, a Wyoming nonprofit membership corporation; JENY GARDNER, individually and on behalf of her minor child; CHRISTINA HUTCHISON, individually and on behalf of her minor children; KATHRYNE PENNOCK III, individually and on behalf of her minor children; KATHARINE and ZACHARY SCHNEIDER, individually and on behalf of their minor children; CHAD SHARPE and KIMBERLY LUDWIG-SHARPE, individually and on behalf of their minor child; and CHRISTINA VICKERS and BRANDON VICKERS, individually and on behalf of their minor children,

Appellees
(Plaintiffs).

No. S-25-0203

APPELLANTS' REPLY BRIEF

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ARGUMENT

I. An order granting a preliminary injunction is an appealable order.

Appellees argue that an order granting a preliminary injunction is not an appealable order. (Appellees' Br. at 2-3). In doing so, they overlook the plain text of Rule 1.05 of the Wyoming Rules of Appellate Procedure. (*Id.*). They also ignore the numerous cases in which this Court has resolved appeals of preliminary injunctions on the merits. (*Id.*).

To resolve this issue, this Court must interpret Rule 1.05. To do so, this Court applies the same methodology when interpreting procedural rules as it does statutes. *Busch v. Horton Automatics, Inc.*, 2008 WY 140, ¶ 13, 196 P.3d 787, 790 (Wyo. 2008). Interpretation begins with considering the plain meaning of the words, giving effect to all parts and construing them as a whole. *In re Est. of Seader*, 2003 WY 119, ¶ 23, 76 P.3d 1236, 1244 (Wyo. 2003). If the rule is clear and unambiguous, this Court need only give effect to its plain language. *Id.*

In this case, Rule 1.05 is clear and unambiguous: "An appealable order is . . . [i]nterlocutory orders and decrees [sic] of the district courts which . . . [g]rant . . . injunctions[.]" Wyo. R. App. P. 1.05. The rule acknowledges that an order granting an injunction may be interlocutory, but it is nevertheless an appealable order. The plain language confirms that this appeal is proper.

Moreover, the right to appeal preliminary injunctions in Wyoming has never been in serious doubt. In 1968, this Court noted that preliminary injunctions were appealable before the Rules of Civil Procedure existed and defined an appealable order. *Logan v. Stannard*, 439 P.2d 24, 25 (Wyo. 1968). It then considered the merits of the preliminary

injunction before it. *Id.* at 25-26. Thirty years later, this Court noted that the 1992 amendment to Rule 1.05 shifted the appealability criteria from finality to whether an order was appealable under the rule. *FML v. TW*, 2007 WY 73, ¶ 5, 157 P.3d 455, 458 (Wyo. 2007). Consequently, an order need not be final to be appealable, it must only fall into one of the categories in the rule. *See id.* ¶¶ 6-7, 157 P.3d 458-59 (holding that a custody order was made in a special proceeding and was therefore appealable despite not being final).

Over the years this Court has often considered the merits of a preliminary injunction without comment. For example, in *Crouthamel v. Board of Albany County Commissioners*, the appellant appealed a preliminary injunction preventing him from operating his business. *Crouthamel v. Bd. of Albany Cnty. Commr's*, 951 P.2d 835, 835, 837 (Wyo. 1998); *also, Brown v. Best Home Health & Hospice, LLC*, 2021 WY 83, 491 P.3d 1021 (Wyo. 2021); *Malave v. W. Wyo. Beverages, Inc.*, 2022 WY 14, 503 P.3d 36 (Wyo. 2022).

Both the plain language of Rule 1.05 and this Court's precedent establish that an order granting a preliminary injunction is appealable. To the extent it is necessary for this Court to address this issue at all, it should hold that an order granting a preliminary injunction—like the order in this case—is an appealable order.

II. Article 7, section 1 of the Wyoming Constitution does not prohibit the Legislature from enacting the Educations Savings Account Program.

Appellees raise article 7, section 1 of the Wyoming Constitution as a new basis for invalidating the ESA Program. (Appellee Br. at 14-28). Article 7, section 1 provides:

> The legislature shall provide for the establishment and maintenance of a complete and uniform system of public instruction, embracing free elementary schools of every needed kind and grade, a university with such

> technical and professional departments as the public good may require and the means of the state allow, and such other institutions as may be necessary.

Wyo. Const. art. 7, § 1. An appropriate textual analysis using this Court's established constitutional interpretation methodology shows that the ESA Program is well within the Legislature's authority to enact.

This Court uses the same methodology to interpret and construe the Wyoming Constitution as it does for statutes. *In re Neely*, 2017 WY 25, ¶ 41, 390 P.3d 728, 742 (Wyo. 2017). The primary goal is to ascertain the intent of the constitutional framers. *Id.* This Court first considers the ordinary and obvious meaning of the constitutional language at issue. *Seader*, ¶ 23, 76 P.3d at 1244. Every portion must be given effect and viewed together in pari materia. *Id.* If the language is clear and unambiguous, this Court merely applies its plain meaning. *Id.* Resort to the general principles of statutory construction is only necessary if the language is ambiguous, that is, susceptible to more than one interpretation. *Id.*

The plain language of article 7, section 1 requires the Legislature to create a "complete and uniform system of public instruction," and articulates what the system must include. *Id.* Most relevant, it specifies that the system must contain "free elementary schools of every kind and grade." *Id.*

In *Campbell I*, this Court considered this provision, and article 7, section 9, to conclude that the Legislature must create:

> an organization forming a network for serving the common purpose of public schools which organization is marked by full detail or complete in all respects and productive without waste and is reasonably sufficient for the

> appropriate or suitable teaching/education/learning of the state's school age children.

Campbell Cnty. Sch. Dist. v. State, 907 P.2d 1238, 1258-59 (Wyo. 1995) (*Campbell I*). The Legislature met that obligation.[1] *Campbell Cnty. Sch. Dist. v. State*, 2008 WY 2, ¶ 138, 181 P.3d 43, 84 (Wyo. 2008) (*Campbell IV*).

Appellees argue that, rather than a directive, section one is a prohibition on any education-related program not explicitly directed. (Appellees' Br. at 25-26). They contend that the framers intended to shackle the Legislature by implication. To do this, they rely on the canon of statutory construction *expressio unius est exclusion alterius*, or the principle that text applying to one subject or thing cannot be construed to apply to other subjects or things not expressly mentioned. (Appellees' Br. at 25-26). Relying on this canon is precarious given this Court's caution that it should be employed advisedly, and that it does not have universal application. *Ramsay Motor Co. v. Wilson*, 30 P.3d 482, 483 (Wyo. 1934). Nevertheless, Appellees generally claim that because section 1 requires the Legislature to create an education system, it is prohibited from providing for education outside that system. (*Id.*).

Section 1 is clear and unambiguous because it requires the Legislature to create a system of education. Nothing in section 1 or any other constitutional provision prohibits

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[1] While that system is currently under challenge, none of the issues raised in that challenge impact the ESA program, nor does the ESA Program impact those issues. *See State of Wyo. v. Wyo. Educ. Ass'n, Br. of Appellant* at 2, No. S-25-0136 (Wyo. July 24, 2025).

the Legislature from creating any other educational benefit or program separate from the system required by section 1.

The ESA Program is an exercise of the Legislature's plenary authority. Section 1 does not restrict that authority. Nearly a century ago, this Court recognized that state legislative authority is plenary, that is, the Legislature may act in any way it decides is necessary.[2] *State v. Johnson Cnty. High Sch.*, 5 P.2d 255, 261 (Wyo. 1931). Constitutions do not empower legislatures. *Id.* Rather, they withdraw powers that they would otherwise have. *Id.* This Court reinforced that principle several times over the intervening time, most recently two months ago. *Hicks v. State*, 2025 WY 113, ¶ 90, 578 P.3d 366, 391 (Wyo. 2025).

If this Court goes beyond the plain language of section 1, Appellees' authorities give no true support. In their first case, *Walters v. State ex rel. Wyoming Department of Transportation*, the appellant argued that she should have been advised of more than the warnings required in Wyo. Stat. Ann. § 31-6-102(a)(ii). (Appellees' Br. at 25 (citing *Walters v. State ex rel. Wyo. Dep't of Transp.*, 2013 WY 59, ¶¶ 13-14, 17, 300 P.3d 879, 883 (Wyo. 2013)). This Court determined that no additional warnings were necessary beyond those that appeared in the statute. *Walters*, ¶¶ 18-19, 300 P.3d at 884. This Court

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[2] While not decisive, this appears to be the unchallenged view of at least one delegate to Wyoming's constitutional convention. *J. and Debates of the Const. Convention of the State of Wyo.*, at 703. "This question of framing a constitution means simply this. That it is framed for the purpose of limitation." *Id.*

effectively refused to add requirements to the statute, and the *expressio unius* canon provided some support for refusing to do so. *Id.*

Appellees also rely on *Cathcart v. Meyer*. (Appellees' Br. at 25). There, the appellants challenged term limits for certain elected officials. *Cathcart*, ¶¶ 4-6, 88 P.3d at 1055-56. This Court recited the *expressio unius* canon as part of its general description of how it interprets and construes statutes.[3] *Id.* ¶ 45, 88 P.3d at 1067.

But the *Cathcart* Court did not rely on the canon of construction. *Id.* ¶ 47, 88 P.3d at 1068. It focused on the plain language of article 1, section 3. *Id.* That provision prohibits laws "affecting the political rights and privileges of its citizens" on account of any condition other than incompetence or court-determined "unworthiness." Wyo. Const. art. 1, § 3. In other words, term limits were laws affecting political rights and privileges, and therefore were impermissible under section 3. *Cathcart*, ¶ 47, 88 P.3d at 1068 The *expressio unius* canon was irrelevant.

Appellees' logic would prohibit much more than the ESA Program. For example, the Wyoming Constitution requires the Legislature to require children to attend school for three years between ages six and eighteen. Wyo. Const. art. 7, § 9. The current compulsory

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[3] Notably, term limits imposed in *Cathcart* and the ESA Program offered in this case are not similar in scope or structure. Term limits, by their nature, restrict who may undertake certain political activity, that is, hold office. The ESA Program is expansive. It does not restrict who can enter the public education system. It merely offers support for parents who opt out of that system.

attendance law requires children to attend school continuously from approximately ages seven through sixteen or through the tenth grade, whichever comes first. Wyo. Stat. Ann. § 21-4-102(a). In other words, children must attend school for significantly more than three years. If Appellees are correct about the Legislature's limitations, however, then it cannot require more than the three years of school set out in the Constitution. Wyo. Const. art. 7, § 9. This is only one absurd result that would follow from Appellees' argument. If adopted, its implications would range far and wide.

No amount of contortion will make the ESA Program a part of the public education system. That system currently exists and continues to receive legislative support. The Legislature appropriated $1,765,490,292 to the school finance program in 2022 for fiscal years 2023 and 2024. 2022 Wyo. Sess. Laws 165-66. That appropriation was later amended to $1,822,890,292. 2023 Wyo. Sess. Laws 233-34. In 2024, the Legislature again increased biennial school funding, appropriating $1,880,494,274—approximately $57.6 million more than the previous biennium. 2024 Wyo. Sess. Laws 304. Nothing in section 1 prohibits the Legislature from establishing, alongside and apart from the system of public education, a program to assist parents who opt out of that system.

Appellees rely on individual comments in the Wyoming Constitutional debates. (Appellees' Br. at 22-24). They claim that the framers, when discussing various provisions, expressed antipathy toward private schools and wished to restrict public funds from being paid to private schools. (*Id.*). The debates, even if they were reliable authority, do not support their conclusion.

First, just like statements of individual legislators, statements of individual founders do not aid in determining the intent of the whole body. *See Indep. Prods. Marketing Corp. v. Cobb*, 721 P.2d 1106, 1108 (Wyo. 1986) (holding that "[a]ffidavits by legislators . . . are not a proper source of legislative history"); *Greenwalt v. Ram Rest. Corp. of Wyo.*, 2003 WY 77, ¶ 52, 71 P.3d 717, 735 (Wyo. 2003) (rejecting as evidence a legislator's letter to the Legislative Service Office); *Rasmussen v. Baker*, 50 P. 819, 824 (Wyo. 1897) (noting that constitutional debates are "not a very reliable source of information" and "they are deemed an unsafe guide" to interpretation); *Powers v. State*, 2014 WY 15, ¶ 39, 318 P.3d 300, 314 (Wyo. 2014) (citing *Rasmussen* and noting the logical flaw in attributing statements by one member to an entire body). This Court should decline to delve into those statements.

Second, even if this Court gives credence to the constitutional debates in this case, they do little to support Appellees' position. Appellees first cite a discussion concerning taxation. (Appellees' Br. at 22 (quoting *J. and Debates of the Const. Convention of the State of Wyo.*, at 703-04 (1893)). The only relevance to education at all is the question of whether the proposed tax proceeds should be reserved to public schools. *J. and Debates of the Const. Convention of the State of Wyo.*, at 703-04. In doing so, one delegate expressed support for "a system of common schools" in making the point that "we ought not to have a limitation on" spending for that purpose. *J. and Debates of the Const. Convention of the State of Wyo.*, at 704. The debate moved on to discuss the general principle that profit on public funds (i.e., interest) should go to the fund from which the profit derives. *Id.* This

was not specific to the public schools, and there is no textual reason to draw sweeping conclusions from this taxation discussion. *Id.*

Appellees similarly exaggerate the prominence of private schools during the article 7 debates. (Appellees' Br. at 23-24). The bulk of the discussion they cite concerned not a funding restriction, but instead how the existing school funding should be apportioned to school districts. (*Id.* (quoting *J. and Debates of the Const. Convention of the State of Wyo.*, at 733-36)). For example, Charles Burritt of Johnson County contended that funding from the accounts in question "should be distributed among the counties in accordance with the number of children actually in attendance" as opposed to those residing in the counties. *J. and Debates of the Const. Convention of the State of Wyo.* at 734. Melville Brown of Albany County disagreed, arguing that funding should be apportioned according to all resident school-age persons. *Id.* It is in this context that Burritt stated that he didn't "go much on these outside schools." *Id.* at 735.

After receiving additional opposition, Burritt withdrew his amendment. *Id.* Even afterward, Elliott Morgan, speaking for the committee that developed the proposed language, said that the private school debate "don't cut any figure," i.e., weighs neither for or against any particular view concerning allocation. *Id.* In the end, the delegates chose to retain the requirement that school funding be distributed to counties "according to the number of children of school age in each," as opposed to the number of actual school

attendees.[4] *Id.* 736; Wyo. Const. art. 7, § 8 (1890). It is unclear how one could derive a clear consensus on the current dispute before this Court from this scant discussion concerning funding allocation.

Finally, Appellees contend that by enacting the ESA Program, the Legislature violated its obligation to provide students an opportunity to receive, and access to, a rigorous education. (Appellees' Br. at 14, 16, 19). They levy considerable criticisms at the ESA Program's requirements, even going so far as to present information that is not in the record concerning private schools that may enroll ESA Program students. (*Id.* at 16-22). Appellees logic is flawed. This Court has never held that the State must force students to be educated through the public education system. It has only required that the state provide opportunity or access to a high-quality education system. *Washakie Cnty. Sch. Dist. No. 1 v. Herschler*, 606 P.2d 310, 315 (Wyo. 1980); *Campbell I*, 907 P.2d at 1259. Nothing about the ESA Program removes that access.

Wyoming parents have always had the option to provide education to their children outside of the constitutionally prescribed public education system. The Constitution itself allows for education "by other means." Wyo. Const. art. 7, § 9. In 1887, parents were required to send their children (age six through twenty) to some school "at least three

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[4] Of course, these provisions only govern school funds, while the ESA Program is funded through the general fund. Wyo. Const. art. 7, §§ 2-9; 2024 Wyo. Sess. Laws 241; 2025 Wyo. Sess. Laws 220.

months in each and every year." 1887 Rev. Stats. of Wyo. § 3949. The law was silent about whether the school must be public or private.

In Wyoming's first legislative session as a state in 1891, it adopted the then-existing territorial law. 1890-91 Laws of Wyo. 157-58. In 1907, it amended the law and specified that children must be sent "to a public, private or parochial school, or to two or more of these schools" for the first six months of the school year. 1907 Wyo. Sess. Laws 160. The Legislature added home-based education as another option in 1985. 1985 Wyo. Sess. Laws 225-27.

Opting out of public schools, however, does not relieve parents of the obligation to provide for their children's basic education. They may do so either through a private school or a home-based educational program. Non-parochial private schools are regulated under Wyo. Stat. Ann. §§ 21-2-401 through -407. Home-based educational programs must meet requirements of a basic academic educational program, which includes fundamental instruction in reading, writing, mathematics, civics, history, literature, and science. Wyo. Stat. Ann. §§ 21-4-102(b), -101 (a)(vi).[5]

Against this backdrop, it is easy to see the ESA Program for what it really is: a program, separate from the state education system, designed to support parents who choose

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[5] The Legislature amended Wyo. Stat. Ann. § 21-4-102(b) in the 2025 session. 2025 Wyo. Sess. Laws 106-07. It removed the requirement that parents demonstrate adherence to this requirement in advance but did not alter their underlying obligation to provide a basic academic educational program. *Id.*

to forego that system. The Legislature met its obligation to provide a high-quality education system. In addition to that system, it provided the ESA Program. Nothing about the ESA Program violates the Wyoming Constitution.

III. The ESA Program does not violate article 16, section 6 of the Wyoming Constitution because the expenditure is for a public purpose and the State receives a public benefit.

Appellees also claim that the ESA Program violates on article 16, section 6 of the Wyoming Constitution. (Appellees' Br. at 31-36). This constitutional provision provides, in pertinent part:

> (a) Neither the state nor any county, city, township, town, school district, or any other political subdivision, shall:
>
> > (i) Loan or give its credit or make donations to or in aid of any individual, association or corporation, except for necessary support of the poor

To analyze whether expenditure of state funds violates article 16, section 6(a)(i),this Court considers three elements: (1) Does a public purpose exist for the transaction?; (2) If the transaction may result in a private benefit, has adequate consideration been exchanged—in other words, is there sufficient benefit accruing to the State?; and (3) Is there independent statutory authority for the State to act in the manner intended? *See, e.g.*, *Uhls v. State ex rel. City of Cheyenne*, 429 P.2d 74, 86, 90 (Wyo. 1967); *Frank v. City of Cody*, 572 P.2d 1106, 1111-12 (Wyo. 1977); *Witzenburger v. State ex rel. Wyo. Cmty. Dev. Auth.*, 575 P.2d 1100, 1133 (Wyo. 1978); *U.S. W. Commc'ns, Inc. v. Wyo. Pub. Serv. Comm'n*, 907 P.2d 343, 346 (Wyo. 1995). If each of these elements exists, an expenditure does not violate article 16, section 6.

First, in analyzing the public purpose requirement, this Court defers to the Legislature unless there is no "reasonable relation to the public interest and welfare." *Uhls*, 429 P.2d at 86-87. The *Uhls* Court further recognized that economic development from a "new or expanded industry" is an "appropriate" public purpose. *Id.* Other instances in which the Supreme Court has found that a "public purpose" exists include:

- Property tax exemptions for veterans, *State ex rel Br. of Comm'rs of Goshen Cnty. v. Snyder*, 212 P. 771, 777 (Wyo. 1923);
- The sale of revenue bonds for industrial development projects, *Powers v. City of Cheyenne*, 435 P.2d 448, 450, 452 (Wyo. 1967);
- Remedying the "critical shortage adequate housing" in the state, *Witzenburger*, 675 P.2d at 1131;
- Municipal revolving funds, *Banner v. City of Laramie*, 289 P.2d 922, 929 (Wyo. 1955); and
- Payments made to compensate the widow of a law enforcement officer slain in the line of duty, *State v. Carter*, 215 P. 477, 478, 482-83 (Wyo. 1923).

The ESA Program satisfies the public purpose prong because it purchases educational resources for parents opting out of the public school system. Wyo. Stat. Ann. §§ 21-2-901 through -909. Wyoming has long found a public purpose in ensuring that children receive education, even those who are not participating in the public school system, by requiring minimal educational standards. *See* Wyo. Stat. Ann. § 21-4-102(b) (requiring that parents opting for home-based education meet basic academic educational program requirements). The State's longstanding public interest in educating children is at least as well established as the notion that tax exemptions for veterans and compensation

to a sheriff's deputy's widow constitute public purposes. *Snyder*, 212 P. at 777; *Carter*, 215 P. at 482-83.

The second element is whether the State will receive adequate consideration for ESA Program expenditures. Article 16, section 6 does not prohibit using public funds for a public purpose even though a private benefit may accrue incidental to that purpose. *Witzenburger*, 575 P.2d at 1133. If the private benefit is more than incidental, however, there must be an exchange of adequate consideration. *Frank*, 572 P.2d at 1111-12.

The ESA Program satisfies the adequate consideration element because any public benefit going to private entities is incidental to the public purpose of supporting education. The Legislature intended to assist parents in providing education, but only those who opt out of the public education system. Wyo. Stat. Ann. § 21-2-904(b)(ii)(C). Educating children provides a public benefit. *See Campbell I*, 907 P.2d at 1279 (emphasizing the importance of education). If the public interest in education is not sufficient, the state receives adequate consideration in exchange for its payments. The ESA funds are not simply given to families. Instead, they are paid directly to providers in exchange for goods and services. Wyo. Stat. Ann. §§ 21-2-903(b), -904(b)(i). Providers are subject to certification and other requirements to avoid fraud and abuse. Wyo. Stat. Ann. §§ 21-2-906, -907. The State accordingly satisfies its long-held interest in ensuring education even to students whose parents decline to participate in the public school system.

The final part of the analysis is that statutory authority must exist for the expenditure. Although the Wyoming Supreme Court has not discussed the need for statutory authority specifically in terms of article 16, section 6(a)(i), state agencies

generally require delegated authority to act. *See, e.g., U.S. West Commc'ns, Inc.*, 907 P.2d at 346 (citation omitted) ("[A]n administrative body has only the power and authority granted by the constitution or statutes creating the same."); *see also* Wyo. Stat. Ann. § 16-3-114(c)(ii)(C).

The ESA Program satisfies the statutory authority element. *See Wyo.* Stat. Ann. § 21-2-901 through -907. The Superintendent is authorized to disburse funding according to the statutory directive and rules that she promulgates. Wyo. Stat. Ann. §§ 21-2-903(b), -906(c).

Taking all elements into account, the ESA program is not an improper donation under article 16, section 6. The State is purchasing something of value, that is, educational benefit for students whose parents have opted them out of the public education system. Any benefit to education providers, who may be private schools or some other education vendor, is incidental to the educational benefit the State receives. That educational benefit also acts as consideration for the public funds expended. In short, the ESA Program is consistent with article 16, section 6 of the Wyoming Constitution and all other provisions Appellees rely on to impose their policy preferences on the State.

CONCLUSION

For the foregoing reasons, the Superintendent of Public Instruction, State Treasurer, and State of Wyoming respectfully request that this Court reverse the district court's order enjoining the ESA Program.

Dated this 22nd day of December, 2025.

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CERTIFICATE REGARDING ELECTRONIC FILING

I, Mackenzie Williams, hereby certify that the foregoing Appellants' Reply Brief was served electronically via the Wyoming Supreme Court C-Track Electronic Filing System, this December 22, 2025, on the following party:

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