

Alexander Kolodin (SBN 030826)
Roger Strassburg (SBN 016314)
Veronica Lucero (SBN 030292)
Michael Kielsky (SBN 021864)
Arno T. Naeckel (SBN 026158)

Davillier Law Group, LLC

4105 N. 20th St. Ste.110

Phoenix, AZ 85016

Phone: (602) 730-2985

Fax: (602) 801-2539

Emails:

akolodin@davillierlawgroup.com

rstrassburg@davillierlawgroup.com

vlucero@davillierlawgroup.com

mkielsky@davillierlawgroup.com

anaeckel@davillierlawgroup.com

phxadmin@davillierlawgroup.com

Attorneys for the Plaintiff

IN THE SUPERIOR COURT OF THE STATE ARIZONA

IN AND FOR THE COUNTY OF SANTA CRUZ

STEVEN McEWEN, Chairman of the
Santa Cruz County Republican
Committee;

Plaintiff,

vs.

SUZANNE SAINZ, in her official
capacity as SANTA CRUZ COUNTY
RECORDER; and ALMA SCHULTZ, in
her official capacity as DIRECTOR of the
SANTA CRUZ COUNTY ELECTIONS
DEPARTMENT,

Defendants.

CASE NO:

**VERIFIED COMPLAINT FOR A
SPECIAL ACTION AND**

**APPLICATION WITH PROPOSED
ORDER TO SHOW CAUSE WHY
RELIEF SHOULD NOT BE
GRANTED**

**(Complaint Requests Order to Show
Cause)**

(Expedited Election Case)

1 Pursuant to Rule 3 *et.seq.* of the Arizona Rules of Procedure for Special Actions
2 (“ARPSA”), A.R.S. §§12-122, 12-123, 12-124, 12-2021, the Arizona Uniform
3 Declaratory Judgments Act, and other applicable law, Plaintiff for his Verified Complaint
4 against Suzanne Sainz, in her official capacity as Santa Cruz County Recorder and Alma
5 Schultz, in her official capacity as Director of the Santa Cruz Elections Department
6 (collectively, “Defendants”) makes the following allegations. In addition, Plaintiff,
7 pursuant to Rule 7.3 of the Arizona Rules of Civil Procedure, requests an order to show
8 cause why relief should not be granted on an expedited basis. A proposed order is being
9 lodged with the Court herewith.
10

11 SUMMARY

12 1. A.R.S. §16-552, entitled “*Early ballots; processing; challenges,*” provides
13 that county chairpersons of each political party with candidates on the ballot have the
14 authority to appoint early ballot challengers (as distinguished from observers):
15

16 A. The county chairman of each political party represented on the ballot, by
17 written appointment addressed to the early election board, may designate
18 party representatives and alternates to act as early ballot challengers for the
party

19 2. With certain exceptions not applicable here, A.R.S. §16-452 provides that
20 Arizona’s Election Procedures Manual (“EPM”) has the force of law and that violation of
21 that manual is a class 2 misdemeanor.

22 3. The EPM provides: “Challenges to early ballots must be submitted prior to
23 the opening of the early ballot affidavit envelope.” EPM pg. 67; *see also* A.R.S. §16-
24 552(D, G) (*accord*).

25 4. A.R.S. §16-591 indicates that the grounds for challenging a ballot are as set
26 forth in A.R.S. §16-121.01(B). Pursuant to that statute, the grounds for a challenge
27 include “the registrant is not the person whose name appears on the register” and that the
28 registrant is not a qualified registrant (*i.e.* a properly registered voter in the jurisdiction).

1 5. In addition, the EPM indicates that ballots cast by mail may be challenged
2 based on apparently inconsistent signatures on the affidavit on the return envelope when
3 compared against a known signature on the voter registration or other equivalent
4 document. EPM pg. 69.

5 6. To carry out the authority granted by the laws and authorities referenced
6 above, early ballot challengers must be able to observe the signatures on unopened early
7 ballot envelopes and the signatures to which they are being compared so that an accurate
8 record can be made as to which voters' signatures were challenged, but the Defendants
9 are refusing to allow challenges to stand close enough to the computer screens to actually
10 see the signatures.
11

JURISDICTION AND VENUE

12
13 7. This Court has original jurisdiction over actions seeking mandamus,
14 injunction, and other extraordinary writs against the state and its officers. Ariz. Const. art.
15 6, § 14; A.R.S. § 12-2021; *See also* ARPSA Rules 1, 3, & 7 (replacing prior procedures).
16

17 8. This petition (1) involves purely legal questions of first impression that are
18 (2) matters of substantial public impact and that (3) require a final resolution on an
19 expedited basis because there is no “equally plain, speedy, and adequate remedy by
20 appeal.” ARPSA 1.

21 9. Moreover, this case involves issues of substantial public impact. “The right
22 to vote is the right to participate in an electoral process that is necessarily structured to
23 maintain the integrity of the democratic system.” *Burdick*, 504 U.S. at 441. “Election laws
24 play an important role in protecting the integrity of the electoral process.” *Ariz. Pub.*
25 *Integrity All.*, 250 Ariz. at 61 ¶ 4. See also, *Teigen v. Wisconsin Elections Comm’n*, Case
26 No. 2022AP91, at 3n.4 (Wis. Supreme Ct, July 8, 2022)(“Elections are the foundation of
27 American government and their integrity is of such monumental importance that any
28 threat to their validity should trigger not only our concern but our prompt action.”).

1 10. Venue is proper in this County under A.R.S. §12-401, as, on information
2 and belief, all Defendants reside here, and conduct their businesses here, and the actions
3 complained of occurred here.

4 11. Venue is also proper in this County under Rule 4(b), ARPSA, because this
5 is the county in which the body or Defendants should have determined the matter to be
6 reviewed and the county of the principal place of business of the Defendants.
7

8 **PARTIES**

9 12. Plaintiff McEwen is an Arizona citizen and a registered voter. He is also
10 Chairman of the Santa Cruz Republican Party, which has candidates on the ballot for the
11 upcoming primary (and general) election.

12 13. Defendant, Suzanne Sainz, is the Recorder of Santa Cruz County, Arizona.
13 <https://www.santacruzcountyz.gov/287/Recorder> (accessed 2022.07.08).

14 14. The Recorder supplies and retains voter registration forms, as well as
15 assigning registration records to its proper precinct, preparing the voter list for candidates
16 and political parties, and preparing voter rosters for the voting polls.
17 <https://www.santacruzcountyz.gov/287/Recorder> (accessed 2022.07.08).

18 15. Defendant, Alma Schultz, is the Director of the Santa Cruz County Elections
19 Department.

20 16. The Santa Cruz County Elections Department, under the direction of the
21 Board of Supervisors administers, conducts and tallies all federal, state and county
22 elections held in Santa Cruz County in accordance to Arizona Revised Statutes.
23 <https://www.santacruzcountyz.gov/173/Elections> (accessed 2022.07.08).

24 17. Santa Cruz County has approximately 31,000 active registered voters
25 residing in 24 election precincts and the Elections Department is responsible for:

- 26 (a) Final vote tabulation and official results for canvassing by the
27 Board of Supervisors,
- 28 (b) Issuing, accepting and maintaining candidate, initiative, referendum
 and recall filings and campaign committee financial reports,

- (c) Providing for the printing of all election related material,
- (d) Recruiting, hiring and training election board workers, and
- (e) Securing polling locations.

<https://www.santacruzcountyaz.gov/173/Elections> (accessed 2022.07.08).

18. On information and belief, the Elections Department also is responsible for the verification of signatures on mail-in ballots and/or other early ballots, responsibility that is shared with the Defendant Recorder.

STANDING

19. Plaintiff McEwen has standing as an Arizona citizen and voter residing in Santa Cruz County. In *Arizona Public Integrity Alliance*, this Court held that “Arizona citizens and voters” have “sufficient beneficial interest to establish standing” in a mandamus action seeking to compel public officials to comply with state election laws. 250 Ariz. at 62 ¶ 12 (2020). Plaintiff also has standing as a taxpayer since the conduct of elections in the County requires the use of taxpayer funds.

20. Plaintiff McEwen seeks to compel the Defendants to perform their non-statutory duty to allow him or his designated challenger to be present and meaningfully observe the early ballot signature verification process so as to make an informed decision how to exercise his rights to challenge.

THE COURT MUST PROTECT THE RIGHT OF COUNTY PARTIES TO APPOINT EARLY BALLOT CHALLENGERS TO MAKE MEANINGFUL CHALLENGES TO INVALID SIGNATURES.

21. All early ballots received by the County and each of the original affidavits on the return envelopes signed by the voter must be delivered to the early election boards appointed by the County. (A.R.S. §16-551(C)).

22. The early election boards must check each “voter’s affidavit on the envelope containing the early ballot.” (A.R.S. §16-552(B)).

MARICOPA COUNTY BALLOT AFFIDAVIT - STATE OF ARIZONA
 I declare the following under penalty of perjury: I am a registered voter in Maricopa County, Arizona, I have not voted and will not vote in this election in any other county or state and if this is a replacement ballot, that the ballot was lost, spoiled, destroyed or not received. I understand that knowingly voting more than once in any election is a Class 5 felony and I voted the enclosed ballot and signed this affidavit personally unless noted below.

IF THE VOTER WAS ASSISTED BY ANOTHER PERSON IN MARKING OR RETURNING THE BALLOT, COMPLETE THE FOLLOWING: I declare under penalty of perjury: at the registered voter's request I assisted the voter identified in this affidavit with marking or returning the voter's ballot, I marked or returned the ballot as directly instructed by the voter; I provided the assistance because the voter was physically unable to mark the ballot solely due to illness, injury or physical limitation or was otherwise unable to return the ballot and I understand that there is no power of attorney for voting and that the voter must be able to make the voter's selection even if they cannot physically mark the ballot.

Name of Voter Assistant: _____
 Address of Voter Assistant: _____

DECLARACIÓN JURADA DE LA BOLETA DEL CONDADO DE MARICOPA - ESTADO DE ARIZONA
 Declaro lo siguiente bajo pena de perjurio: Soy un votante inscrito en el Condado de Maricopa, Arizona, no he votado y no votaré en esta elección en ningún otro condado o estado y si esta es una boleta de reemplazo, la boleta se extravió, se estropeó, se destruyó o no se recibió. Entiendo que votar celebradamente más de una vez en cualquier elección es un delito grave de Clase 5, yo voté en la boleta adjunta y firmé esta declaración jurada personalmente, a menos que se indique a continuación.

SI OTRA PERSONA AYUDÓ AL VOTANTE A MARCAR O DEVOLVER LA BOLETA, COMPLETE LO SIGUIENTE: Declaro bajo pena de perjurio: A petición del votante identifcado en esta declaración jurada a marcar o devolver la boleta del votante, yo marqué o devolví la boleta de acuerdo a lo que el votante me indicó directamente, proporcioné ayuda porque el votante físicamente no pudo marcar la boleta debido únicamente a enfermedad, lesión o limitación física o porque no podía devolver la boleta y entiendo que no hay ningún poder notarial para votar y que el votante debía hacer su selección aunque físicamente no pueda marcar la boleta.

Nombre del Asistente del Votante: _____
 Dirección del Asistente del Votante: _____

BOD CODE: 7 - 5001 - 00
 5001 WHT 00 OTH CTR 123456
 13-3812345678901
 MARICOPA COUNTY
 FAMOUS NAMES DEMO ELECTION
 123 ANYWHERE LN P44 PHOENIX
 MARY TEST VOTER JR

BALLOT WILL NOT BE COUNTED WITHOUT YOUR SIGNATURE. POWERS OF ATTORNEY are NOT valid for voting purposes.
LA BOLETA NO SE TRAMITARÁ SIN SU FIRMA. PODER DE ABOGADO NO es válido para fines de votación.

SIGN WITHIN THE BOX FIRME DENTRO DE LA CAJA

 (PHONE: If signatory is questioned) (TELÉFONO: si la firme es cuestionada) (DATE / FECHA)

Within U.S. - MAIL no later than 6 days prior to Election Day (noted on ballot) Dentro de EE.UU. - ENVÍE a más tardar 6 días antes del Día de la Elección (anotado en la boleta)

23. The image to the left is a true and correct copy of the early ballot return envelope and affidavit used by Maricopa County and the one used in Santa Cruz County is substantially similar. It is supplied here for illustrative purposes as to the

location on the return envelope of the affidavit and signature block in which the voter is to provide the signature that the County must verify and the Plaintiff must review to decide how to exercise his right to challenge.

24. Arizona law recognizes sufficiency of signature on the affidavit on the return envelope containing the early ballot as grounds for challenge.

25. If the voter's affidavit is "found to be sufficient," then the vote must be allowed to be counted. (*Id.*).

26. If the voter's affidavit is "insufficient," then the vote must not be allowed to be counted. (*Id.*). Accordingly, sufficiency of signature on the early voter's affidavit is a recognized basis for challenge under Arizona law.

27. Meaningful determination as to whether the voter's affidavit is sufficient or not requires comparison of the signature of the voter on the affidavit on the return envelope with a signature of the voter elsewhere that is known to be genuine.

28. To achieve meaningful determinations as to whether early voter affidavits are sufficient or not, A.R.S. §16-552 recognizes the right of the chairpersons of each political party with candidates on the ballot to appoint early ballot challengers to raise challenges based on appropriate legal bases, including sufficiency of verification of signature (emphasis added):

1 C. *The county chairman of each political party represented on the ballot, by*
2 *written appointment addressed to the early election board, may designate party*
3 *representatives and alternates to act as early ballot challengers for the party. No*
4 *party may have more than the number of such representatives or alternates that*
5 *were mutually agreed on by each political party to be present at one time. If such*
6 *agreement cannot be reached, the number of representatives shall be limited to one*
7 *for each political party.*

8 *H. Party representatives and alternates may be appointed as provided in*
9 *subsection C of this section to be present and to challenge the verification of*
10 *questioned ballots pursuant to section 16-584 on any grounds permitted by this*
11 *section. Questioned ballots that are challenged shall be presented to the early*
12 *election board for decision under the provisions of this section.*

13 29. A.R.S. §16-584 also recognizes ballot verification by signature comparison
14 as a verification method authorized by Arizona law.

15 30. In addition, Elections Procedures Manual (2019), promulgated by the
16 Secretary of State (“EPM”) also recognizes (with the force of law) that signature
17 verification is a lawful basis for challenge of early ballots:

18 *[B]ecause voters who cast an early ballot in-person at an on-site early*
19 *voting location, emergency voting center, or through a special election board must*
20 *show identification prior to receiving a ballot, early ballots cast in-person should*
21 *generally not be invalidated based solely on an allegedly inconsistent signature*
22 *absent other evidence that the signatures were not made by the same person.*

23 (EPM pg. 69). The EPM clearly indicates that inconsistent signatures **are** adequate
24 grounds for challenging early ballots cast **by mail and not in-person**.

25 31. In addition, A.R.S. §16-591 indicates additional grounds for challenging a
26 ballot are as set forth in A.R.S. §16-121.01(B) or on the ground that the voter has voted
27 before at that election.

28 32. A.R.S. §16-594 indicates that a record must be kept of the names of the
challenged voters, the grounds of the challenge, and the determination of the board upon
the challenge.

1 **THE COUNTY IS OBSTRUCTING THE EXERCISE BY PLAINTIFF OF**
2 **THE RIGHT TO MEANINGFULLY OBSERVE AND CHALLENGE**
3 **EARLY BALLOTS' SIGNATURE VERIFICATION**

4 33. By email dated July 7, 2022, Kimberly J. Hunley, Chief Deputy, Santa Cruz
5 County Attorney's Office advised the Plaintiff that the County would not allow
6 challengers, like himself, to be close enough to the computer screens displaying the
7 signatures on the return envelopes to actually see the signature images themselves or the
8 ones that were being compared with them:

9 [W]e have very limited space. We have done our very best to make the early
10 vote verification process as transparent as possible, while protecting voter
11 confidentiality, ballot security, and complying with the law. Political observers are
12 welcome to observe every step of the early voting process, including signature
13 verification, **we simply do not have the ability to provide a space for**
14 **observation of the actual computer screens during signature verification.** We
15 do scan all signatures into the system as the signatures are verified.

16 (See, Exhibit A attached, emphasis added). Having offered access in accordance with the
17 law to the signature verification process, the County has a duty to make that process
18 meaningful, but is not doing so.

19 34. The only access to the signature verification process that the County will
20 provide is at so far away a distance—and in another room—that the challengers will not
21 be able to see the actual signatures on the affidavit images that are being compared with
22 the known signatures from the County's records:

23 [W]e set up an observation area **just outside the room** we are referring to
24 as the **early vote verification center.** You will be able to observe the ballots
25 throughout processing through the long glass window. You will also be able to hear
26 staff processing ballots as there are cutouts in the glass for individuals to pass
27 documents back and forth to one another through the glass. Chairs are set up for
28 political observers in both the early vote center and outside the early vote
verification center.

(*Id.*).!

1 35. Looking on from another room through a glass window too far from the
2 computer screens to actually see the images of the signatures on the early ballot affidavits
3 and the images of the known signatures to which they are being compared is not the kind
4 of access necessary to make the Plaintiff's right to challenge meaningful. In fact, the
5 County's scheme intentionally obstructs that right

6 **PLAINTIFFS HAVE NO EQUALLY PLAIN, SPEEDY, AND ADEQUATE**
7 **REMEDY BY APPEAL**

8
9 36. The issues raised herein are a matter of high urgency because the County is
10 **already engaging in the signature verification process** for the primary election (which
11 is set for August 2, 2022) that this case seeks to stop. (*Id.*).

12 37. Early voting for the primary began on July 6, 2022.
13 <https://azsos.gov/elections/elections-calendar-upcoming-events> (accessed July 8, 2022).

14 38. The deadline to request ballots by mail is July 22, 2022. (*Id.*).

15 39. The deadline to request mail in ballots for the general election (which is set
16 for November 8, 2022) is October 28, 2022, and early voting will begin on October 12,
17 2022. (*Id.*).

18 40. There is not sufficient time to bring this claim in the usual process of trial
19 court-court of appeals-supreme court because the wrong that Plaintiff seeks to right is
20 already on-going and will be until the conclusion of the primary election on or about
21 August 2, 2022.

22 41. Accordingly, there is no equally plain, speedy, and adequate remedy by
23 appeal (Rule 1, Ariz. Rules Spec. Action).

24 42. Moreover, issues raised here implicate election integrity in a very real way.

25 **QUESTIONS RAISED**

26
27 **I.** Does the statutory right of the Plaintiff under A.R.S. 16-552 to be present
28 and to challenge early ballots' signature verification necessarily require meaningful access

1 to the information necessary to determine if the signatures on the ballot envelope affidavits
2 match the known signatures?

3 **II.** Does denial by the County of access to observe the information on the
4 computer screens necessary to meaningfully challenge signature verifications abridge
5 Plaintiff's right under A.R.S. 16-552?
6

7 **THE QUESTIONS RAISED ARE PROPER FOR**
8 **SPECIAL ACTION RELIEF**

9 43. The Defendants have failed to exercise discretion which they have a duty to
10 exercise; or to perform a duty required by law as to which they have no discretion. (Rule
11 3 (a), Ariz. Rules Spec. Action).
12

13 44. Under A.R.S. §16-552, the Plaintiff has a right to be meaningfully present
14 and to challenge the signature verification process being conducted by the County and the
15 County does not have the discretion to frustrate his exercise of that right by denying him
16 access to the images of the signatures that he needs to decide whether to challenge a
17 particular ballot.

18 45. By creating the Plaintiff's right to be present and challenge, A.R.S. §16-
19 552 imposes a duty on the County to give Plaintiff access to be present in a meaningful
20 way so as to exercise his right to challenge in an informed way. The County does not have
21 discretion to shirk its duty in this regard.

22 46. In addition, the Defendant is proceeding or threatening to proceed without
23 or in excess of jurisdiction or legal authority. (Rule 3 (b), Ariz. Rules Spec. Action).

24 47. The County is moving ahead to conduct signature verification of mail-in
25 ballots while at the same time violating its duty to provide Plaintiff access to the process
26 in a meaningful way so that he can actually see the information that he needs to decide
27 whether to challenge a particular ballot. The County does not have the legal authority to
28 proceed in violation of the law.

1 48. The County has made a determination that was arbitrary and capricious or
2 an abuse of discretion that it is simply impossible due to space constraints to afford
3 Plaintiff the access he needs. (Rule 3 (c), Ariz. Rules Spec. Action).

4 49. The County has a number of options open to it to afford the required access
5 to Plaintiff like splitting the signal carrying the signature images between the computer
6 screens that Plaintiff cannot see and big screen televisions located in his room that he
7 could see. The County’s dereliction in making the necessary access available is arbitrary
8 and capricious under these circumstances. It is also partisan as the Defendants are
9 Democrats and the Plaintiff is Republican.
10

11 **INJUNCTIVE RELIEF IS WARRANTED**

12 50. When public officials seek to exceed their legal authority in the means by
13 which they conduct an election, the typical multi-factor standard for preliminary
14 injunctive relief need not be satisfied. Rather, plaintiffs in cases such as these are entitled
15 to preliminary injunctive relief by showing that they are likely to prevail on their claim
16 that Defendants have acted unlawfully. *Ariz. Pub. Integrity All. v. Fontes*, 250 Ariz. 58,
17 64 ¶ 26 (2020) (“Because Plaintiffs have shown that the Recorder has acted unlawfully
18 and exceeded his constitutional and statutory authority, they need not satisfy the standard
19 for injunctive relief.”).¹
20

21 51. Thus, if Plaintiff establishes the likelihood of success on the merits (as is the
22 case here), then irreparable harm, balance of hardships, and public policy in the movant’s
23 favor are presumed, and the requisite injury is shown by demonstrating that the movant is
24
25
26

27 ¹ Typically, a party seeking a preliminary injunction is obligated to establish: (a) a strong likelihood of success on
28 the merits; (b) the possibility of irreparable injury; (c) the balance of hardships favors the movant; and (d) public
policy favors the injunction.” *Shoen v. Shoen*, 167 Ariz. 58, 63 (App. 1990). However, the movant may show either
probable success on the merits and the possibility of irreparable injury or the presence of serious questions and that
the balance of hardships tips sharply in the movant’s favor to obtain relief. *Id.*

1 “beneficially interested” in compelling the public officials to perform their legal duty. *Id.*
2 at 64 ¶¶ 26–27.

3 52. All Arizona citizens and voters are “beneficially interested” in the
4 enforcement of Arizona constitutional and statutory provisions related to election law. *Id.*
5 at 62 ¶¶ 11–12.

6
7 **PRAYER FOR RELIEF**

8 A. As to the primary election set for August, the Plaintiff requests immediate
9 relief in the form of an injunction that the signature verification process for
10 early ballots immediately stop until provisions are made for him to be
11 meaningfully present and see the information on the computer screens that is
12 being used for signature verification.
13
14

15 B. Given that early voting has already begun for the primary election, Plaintiff
16 requests the Court set a show cause hearing on an expedited basis to determine
17 why relief should not be immediately granted.
18

19 C. As to the general election set for November and all future elections, the
20 Plaintiff requests permanent relief that no signature verification of early ballots
21 be conducted without provisions made for challengers to be meaningfully
22 present and see the information on the computer screens that is being used for
23 signature verification.
24
25

26 D. In any special action, a party may claim costs and attorneys' fees as in other
27 civil actions. (Rule 4(g), Ariz. Rules Spec. Action). Accordingly, Plaintiff
28 requests this Court award costs and attorneys' fees in full pursuant to ARS 12-

1 2030, 12-348, the private attorney general doctrine, and any other applicable
2 law

3 E. Plaintiff also requests that a show cause hearing be set and further requests any
4 other relief that the Court determines should be granted.
5

6
7 **RESPECTFULLY SUBMITTED** this 11th day of July 2022

8
9 By: /s/ Roger Strassburg

10 Alexander Kolodin
11 Roger Strassburg
12 Veronica Lucero
13 Michael Kielsky
14 Arno T. Naeckel
15 **Davillier Law Group, LLC**
16 4105 N. 20th Street Ste. 110
17 Phoenix, AZ 85016
18 *Attorneys for the Plaintiff*

19 **EXHIBITS**

20 A. Email thread, July 7, 2022, among Defendant and Plaintiff.

21 B. Proposed Order to Show Cause

22 **VERIFICATION**

23 The facts set forth in the complaint to which this verification is attached are all
24 readily ascertainable from sources for which this Court may take judicial notice.
25 However, in an abundance of caution, I verify under penalties for perjury that the facts
26 set forth therein are true and correct to the best of my knowledge and belief. To the extent
27
28

1 that I am relying upon documents for my verification, I have a reasonable belief that those
2 documents are true and accurate.

3
4
5 *DATE: July 11, 2022*

6 *PRINTED NAME: Steven McEwen*

7 *SIGNATURE: /s/Steven McEwen*

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