

IN THE CIRCUIT COURT OF HAMILTON COUNTY, TENNESSEE

RON LITTLEFIELD,)	
)	
<i>Plaintiff,</i>)	
)	No. _____
vs.)	
)	
HAMILTON COUNTY ELECTION)	Div. ____
COMMISSION,)	
)	
<i>Defendant.</i>)	

SECOND COMPLAINT FOR DECLARATORY JUDGMENT AND INJUNCTIVE RELIEF

Comes Ron Littlefield (“**Mayor Littlefield**”), by and through counsel, and for his Second Complaint for Declaratory Judgment and Injunctive Relief (“**Second Complaint**”), states as follows:

SUMMARY

1. For the second time, Mayor Littlefield is forced to bring an action to prevent the irreparable harm that will be caused by the continuing, manifest errors of the Defendant Hamilton County Election Commission (the “**Election Commission**”) concerning the proper application of the comprehensive procedures and standards that the Tennessee General Assembly has prescribed for any effort to recall municipal elected officials.

2. Tenn. Code Ann. § 2-5-151 expressly provides that it supersedes and replaces any conflicting provision of a municipality’s charter regarding the recall of elected municipal officials. Municipalities can vary by local option only one aspect of the comprehensive State recall procedure, but, as the Circuit Court judge correctly found in the first lawsuit brought by

Mayor Littlefield, the citizens of Chattanooga have not chosen to apply that exception to their City.

3. In a series of actions beginning in June, 2010, the Election Commission has repeatedly ignored the clear mandates of State law and, in each of these instances, has unlawfully applied standards or procedures that are contrary to State law. As described in more detail in this Second Complaint, the Election Commission's acts include:

- Unlawfully establishing a lower requirement for recall signatures than required by State law and unlawfully certifying a recall petition based upon this lower requirement;
- Unlawfully counting signatures that were not dated, in violation of State law and unlawfully certifying a recall petition based upon this violation of state law;
- Unlawfully accepting signatures on petitions that substantially varied in substance from that previously approved and unlawfully certifying a recall petition based upon this violation of law;
- Unlawfully approving a petition form that misstated the recall procedure and did not include a question, as required by State law, and unlawfully certifying a recall petition based upon these illegalities;
- Unlawfully approving and applying a two-step recall procedure, in defiance of State law that requires a three-step recall procedure;

- Unlawfully scheduling an election to select a new mayor in August, 2012, when State law requires that, if a recall effort gathers sufficient signatures, there must first be an election solely on the question of whether an office holder should be recalled and removed from office;
- Unlawfully announcing that qualifying petitions would be made available for election of a new mayor, when State law prohibits election of an official to an office that has not yet been vacated; and
- Unlawfully attempting to schedule a recall election for the November, 2010 statewide election, even though State law only permits recall elections to be held at the time of a general county or municipal election.

4. In each instance, the Election Commission has refused to comply with and apply mandatory provisions of State law, and in several cases, has applied superseded and irrelevant provisions of the Chattanooga City Charter.

5. The Election Commission has ignored well-reasoned, substantive conclusions reached by the Circuit Court Judge in Mayor Littlefield's first lawsuit. These substantive conclusions, concerning the application of the mandatory State law provisions, were not reversed or otherwise addressed by the intervening holding of the Tennessee Court of Appeals. Instead, the Court of Appeals held only that the former proceedings were premature, because the Election Commission had not then taken final action to certify recall petitions and schedule a recall election.

6. The Election Commission has taken its most recent actions to certify an unlawful recall petition and to schedule an unlawful election in contempt of the injunction issued by the Circuit Court in Mayor Littlefield's first lawsuit, even though the injunction remains in effect because the mandate has not yet been returned by the Court of Appeals.

7. By suggesting that its mere certification of recall petitions causes a vacancy in the Office of Mayor, the Election Commission's unlawful actions have created uncertainty and have disrupted the normal operations of the City of Chattanooga.

8. If not immediately enjoined, the Election Commission's unlawful actions to remove a duly elected incumbent office holder, in violation of law, will cause manifest and irreparable harm to Mayor Littlefield and the citizens of Chattanooga.

PARTIES, JURISDICTION AND VENUE

9. Mayor Littlefield is the duly elected and incumbent Mayor of the City of Chattanooga, whose elective term extends until April, 2013.

10. The Hamilton County Election Commission ("**Election Commission**") is the currently serving county election commission for Hamilton County, Tennessee, appointed pursuant to Tenn. Code Ann. § 2-12-101.

11. This Court has jurisdiction pursuant to Tenn. Code Ann. § 16-10-101 and Tenn. Code Ann. § 29-14-102.

12. Venue is proper in this Court pursuant to Tenn. Code Ann. § 20-4-101.

FACTUAL BACKGROUND

13. In 2010, certain groups and individuals undertook to seek the recall and removal of Mayor Littlefield from the office of Mayor of the City of Chattanooga.

14. On June 16, 2010, the Election Commission met and certified a form of a petition to be circulated concerning the recall of Mayor Littlefield. The Election Commission also announced the intent to schedule a recall election for the November 2, 2010 election, if sufficient signatures were collected. A copy of the minutes of the June 16, 2010 Election Commission meeting is attached as **Exhibit A**.

15. The form of the petition approved by the Election Commission on June 16, 2010 is attached as **Exhibit B**.

16. On August 5, 2010, the Election Commission met and determined that the number of signatures of registered voters of the City of Chattanooga required for such petition would be computed according to the provisions of Section 3.18 of the Charter of the City of Chattanooga (“**Charter**”), namely “qualified voters equal in number to at least 50 percentum (50%) of the entire vote for all candidates for the office of Mayor cast at the last preceding general municipal election” A copy of the minutes of the August 5, 2010 Election Commission meeting is attached as **Exhibit C**.

17. The Election Commission thereafter received signed petitions seeking an election for the recall and removal of Mayor Littlefield from the office of Mayor, and has determined the voting qualifications of the persons signing the petitions.

18. Several versions of the petition have been circulated that vary from the petition approved by the Election Commission. These versions omitted spaces where the date each person signed could be stated, and they included language not approved by the Election

Commission. Examples of the different versions of the signed petitions submitted to the Election Commission are included in **Exhibit D**.

19. Neither the form of the petition approved by the Election Commission on June 16, 2010 (**Exhibit B**), nor any of the signed petitions subsequently turned in to the Election Commission, included a question concerning the recall.

20. On the examples included in **Exhibit E**, each petition signature marked with a check mark (✓) has been designated as valid by the Election Commission's staff, and each petition page contains in the top right corner a tally of the petition signatures on that page designated as valid by the Election Commission's staff. As the examples contained in **Exhibit E** illustrate, the Election Commission's staff has been designating as valid petition signatures those that do not contain the date(s) of signature, as well as those contained on petitions which do not include the language approved by the Election Commission. Copies of those petitions which significantly and substantially vary in the form and content of that previously approved by the Election Commission are part of **Exhibit D**.

21. On August 31, 2010, Mayor Littlefield filed his First Verified Complaint for Declaratory Judgment and Injunctive Relief. Thereafter, by order of the Circuit Court entered on September 3, 2010, the City of Chattanooga (the "**City**"), and James Folkner ("**Mr. Folkner**") were permitted to intervene in that proceeding.

22. The trial of the First Verified Complaint was held on September 7, 2010. The relevant and material facts underlying the disputes in that proceeding were stipulated by the parties at this time. A copy of said stipulation is attached here to as **Exhibit F**.

23. By Memorandum Order entered September 8, 2010, the Circuit Court enjoined the "Hamilton County Election Commission from certifying the petitions submitted to it for the

recall of Ron Littlefield as Mayor of the City of Chattanooga.” The Circuit Court concluded that the provisions of Section 3.18 of the Charter of the City of Chattanooga were superseded by Tenn. Code Ann. § 2-5-151. A copy of the Memorandum Order of the Circuit Court is attached hereto as **Exhibit G**.

24. Thereafter, Mr. Folkner appealed the Circuit Court’s determination to the Tennessee Court of Appeals. The Court of Appeals rendered its opinion on November 3, 2011, vacating the Circuit Court’s judgment, and dismissing the Complaint. The Court of Appeals held that “the trial court rendered a ruling without allowing the Election Commission to formally decide whether or not to certify the recall petition.”

25. On November 8, 2011, Mayor Littlefield submitted his Petition for Rehearing, pursuant to Tenn. R. App. P. 39(a), and that Petition was denied by the Court of Appeals by ordered filed December 2, 2011. Copies of the Petition and the Order are attached hereto as **Exhibit H**.

26. Despite the fact that the mandate has not been returned with regard to the appeal, *see* Tenn. R. App. 42, the Election Commission met on November 17, 2011, and took the following actions:

- (a) the Election Commission voted that the number of petition signatures required to certify a recall would be the number specified by the City Charter, Section 3.18, rather than by Tenn. Code Ann. § 2-5-151;
- (b) the Election Commission certified the petitions previously submitted to it for the recall of Mayor Littlefield, in spite of their insufficiency under Tenn. Code Ann. § 2-5-151; and

- (c) the Election Commission set an election for August 2, 2012, to select a new mayor, in spite of the fact that there has been no vote of the people of the City of Chattanooga that Mayor Littlefield should be removed from office.

A copy of the minutes of the November 17, 2011 meeting is attached hereto as **Exhibit I**. Each of the actions taken by the Election Commission was in direct violation of State law and was in direct violation of the injunction issued by the Circuit Court and of Tenn. R. App. 43(b), as the mandate in the appeal has not yet been returned.

27. In so acting, the Election Commission applied recall provisions contained in Section 3.18 of the City Charter. The actions of the Election Commission were taken in violation of Tenn. Code Ann. § 2-5-151, and in disregard of the previous holding of the Circuit Court, confirming that Tenn. Code Ann. § 2-5-151 provided the governing law in this case.

28. Furthermore, the Election Commission has unlawfully determined that qualifying petitions for the August 2, 2012 election for Mayor would be issued beginning January 6, 2012, with the qualifying deadline for the return of the petitions by noon on April 5, 2012.

29. Mayor Littlefield submits that there was no reason for the Election Commission to act before the appeal had been fully and finally resolved, as was evidenced by the fact that, after certifying the recall petitions, the Election Commission did not schedule an election, albeit an illegal one, until a date more than nine (9) months later.

30. Mayor Littlefield would further show that, by its express terms, Tenn. Code Ann. § 2-5-151 governs the procedure for recall of elected municipal officials, and supersedes contrary municipal charter provisions. Under that statute, certification of the proper number of recall petitions leads to an election in which the issue of whether to recall the city official is voted upon. The statute superseded City Charter recall provisions suggesting that, upon

certification of petitions to recall the Mayor, the office becomes immediately vacant and an election is held to fill the position. The Election Commission has announced that it will ignore the controlling State law and will accept nominating petitions for election of a new mayor at the August election.

31. The Election Commission's announced intention to apply superseded Charter provisions, and to hold an illegal election to fill the office of Mayor on August 2, 2012, even though that office will not be vacated until April, 2013, has caused and will continue to cause irreparable harm to Mayor Littlefield and to the citizens of the City of Chattanooga.

32. The Election Commission will not suffer any injury from the grant of the requested injunction prohibiting the Election Commission to proceed with an illegal recall procedure and an illegal election. Grant of the requested injunction will manifestly serve the public interest by permitting the orderly resolution of the pending appellate litigation.

COUNT I

VIOLATION OF TENN. CODE ANN. § 2-5-151(d)

33. Mayor Littlefield restates and incorporates by reference each allegation set forth in the preceding paragraphs of this Second Complaint.

34. Tenn. Code Ann. § 2-5-151(d) provides in pertinent part as follows:

Petitions shall be signed by at least fifteen percent (15%) of those registered to vote in the municipality or county.

35. Tenn. Code Ann. § 2-5-151(j) provides:

This section shall control notwithstanding any statutory provision or charter provision of a municipality or county to the contrary; provided, that any contrary

charter provision of a municipality or county which is enacted after July 1, 1997, shall control with respect only to the requirements set forth in subsection (d) relating to the statutory minimum number of signatures required in a petition, and to the provisions of subdivision (f)(1) relating to the seventy-five day deadline for filing of a petition after final certification by the county election commission.

36. No change to the Chattanooga City Charter relating to the statutory minimum number of signatures set forth in Tenn. Code Ann. § 2-5-151(d) or to the seventy-five day deadline contained in Tenn. Code Ann. § 2-5-151(f)(1) has occurred after July 1, 1997. Accordingly, the State law requirement that a recall petition be signed by at least fifteen percent (15%) of those registered to vote in the municipality preempts and supersedes the Chattanooga City Charter requirement of a lower number of signatures.

37. The Election Commission has announced, and has previously stipulated as a fact as evidenced in **Exhibit F**, that approximately 8,957 valid petition signatures would be required by Section 3.18 of the Charter. The Election Commission has also announced, and has previously stipulated as a fact as evidenced in **Exhibit F**, that approximately 14,854 valid petition signatures would be required by Tenn. Code Ann. § 2-5-151(d).

38. The Election Commission decided that the number of signatures required for a recall would be the lower number specified by Section 3.18 of the Charter, instead of the number provided by Tenn. Code Ann. § 2-5-151(d). The Election Commission's decision was unlawful.

39. The Election Commission's decision concerning the number of signatures required for a successful recall petition was arbitrary, as the Election Commission had previously determined in 2003, in response to advice of its counsel, that the required minimum number of signatures of registered voters of the City of Chattanooga for a similar initiative would be that set out under Tenn. Code Ann. § 2-5-151(d). See Opinion of Jerry H. Summers and article "Save

Our Streets Must Restart Petition Drive,” *Chattanooga Times Free Press* (April 30, 2003) attached as **Exhibit J**.

40. Mayor Littlefield is entitled to a declaration of this Court that the statutory minimum number of signatures required for a recall is to be determined in accordance with Tenn. Code Ann. § 2-5-151(d).

41. Mayor Littlefield is entitled to have this Court enjoin the Election Commission, both temporarily and permanently, from acting unlawfully and contrary to the requirements of Tenn. Code Ann. § 2-5-151, and other applicable law, and from scheduling a recall election relating to Mayor Littlefield based upon any statutory minimum number of signatures other than as prescribed by Tenn. Code Ann. § 2-5-151(d).

COUNT II

VIOLATIONS OF OTHER PROVISIONS OF TENN. CODE ANN. § 2-5-151

42. Plaintiff restates and incorporates by reference each allegation set forth in the preceding paragraphs of this Second Complaint.

43. Section 3.18 of the Charter authorizes the recall of elected officials, including the mayor. A copy of Section 3.18 of the Charter is attached to the Complaint as **Exhibit K**.

44. For cities that authorize the recall of elected officials, Tenn. Code Ann. § 2-5-151 establishes the requirements for the recall procedure. The requirements of Tenn. Code Ann. § 2-5-151 apply “notwithstanding any statutory provision or charter provision of a municipality or county to the contrary,” except that local governments could, after July 1, 1997, enact different requirements only for the minimum number of signatures to trigger a recall election and/or the time for collecting signatures after certification of the petition form. Tenn. Code Ann. § 2-5-

151(j). The City of Chattanooga has not, at any time after July 1, 1997, enacted different requirements for the minimum number of signatures and the time for collecting signatures.

**A. NO ELECTION MAY BE HELD TO ELECT A NEW MAYOR
WHEN THE OFFICE HAS NOT BEEN VACATED**

45. Tenn. Code Ann. § 2-5-151 requires that, if the requirements for a recall petition have been met as to a municipal elected official, an election shall be held to determine whether the official shall be recalled. The elected official is only removed from office if a majority of qualified voters vote that the official shall be recalled. In such a case, the vacancy in office would thereafter filled in accordance with the law.

46. The Election Commission has violated State law by scheduling an election to select a new mayor when (1) no election has occurred in which a majority of qualified voters have voted to recall the incumbent Mayor, and (2) no vacancy exists in the office of Mayor.

B. REQUIREMENT OF THE DATE FOR SIGNATURES OBTAINED

47. Tenn. Code Ann. § 2-5-151(e)(4) requires that each petition signature counted toward the statutory minimum number of signatures contain “the date of the signature.”

48. The forms of petition submitted to the Election Commission and attached to the Complaint as **Exhibit D** omitted spaces where the date of signature could be stated. Many petitions, as illustrated by the examples contained in **Exhibit E**, contain spaces for the date of the signature that are otherwise blank.

49. The Election Commission and its staff have acted erroneously and in violation of state law by accepting as valid any petition signatures that do not contain the date of the signature.

50. The Election Commission acted arbitrarily and contrary to State law by certifying signatures on petitions that do not contain the date of each signature.

51. The Election Commission has further violated state law by scheduling a recall election based upon signatures on petitions that do not contain the date for each signature.

C. REQUIREMENT OF THE DESIGNATION OF A QUESTION

52. Tenn. Code Ann. § 2-5-151(b)(2), (e)(1), (f)(2), and (i) require that a recall petition must set forth the full text of the question proposed to be presented for a vote of the people, whether the referenced incumbent official shall be recalled. The Election Commission's counsel has recognized this requirement in previous advice given the Election Commission. *See* April 22, 2009 letter from Chris Clem to the Election Commission, attached as **Exhibit L** ("The specific question to be placed on the ballot [sic] needs to be included. In this case, I would recommend: 'Shall Ron Littlefield be recalled as Mayor of Chattanooga? Yes or No?'").

53. None of the forms of petition certified by the Election Commission contains any question proposed for a vote of the people.

54. The Election Commission has acted erroneously and in violation of state law in certifying the form of petition attached to the Complaint as **Exhibit B**, because it did not contain any question and, particularly, did not contain the question whether Mayor Littlefield shall be recalled from the office of Mayor of the City of Chattanooga.

55. The Election Commission has violated State law, Tenn. Code Ann. § 2-5-151(h), by certifying signatures on petitions that do not contain any question and, particularly, do not contain the question whether Mayor Littlefield shall be recalled from the office of Mayor of the

City of Chattanooga. As such, the petitions and the signatures fail to meet applicable legal requirements.

56. The Election Commission has further violated state law by scheduling a recall election based upon signatures on petitions of various forms that did not contain any question and, particularly, did not contain the question whether Mayor Littlefield shall be recalled from the office of Mayor of the City of Chattanooga.

D. IMPROPER DESCRIPTION OF THE RECALL PROCESS

57. The Election Commission acted unlawfully and arbitrarily in certifying signatures on petitions in the form attached to the Complaint as **Exhibit B**, because such form contains a description of the recall process that is inconsistent with the requirements set forth in Tenn. Code Ann. § 2-5-151, stating “[i]f this petition is determined to have the sufficient number of valid signatures then the Mayor of Chattanooga is automatically recalled and the board of election commissioners shall at once order and fix a date for holding said successor election not less than thirty days nor more than sixty days from the date of the certificate showing that a sufficient petition was filed.”

58. The Election Commission has further violated State law by scheduling a recall election based upon signatures on petitions of various forms that contained an incorrect description of the recall process set forth in controlling State law.

E. SIGNATURES ON UNAPPROVED FORMS OF PETITIONS

59. The Election Commission and its staff have acted arbitrarily, erroneously and in violation of State law by accepting as valid signatures on petitions that were inconsistent with the form of petition approved by the Election Commission. See **Exhibit D**.

60. The Election Commission has further violated state law by scheduling a recall election based upon signatures on petitions that were inconsistent with the form of petition approved by the Election Commission.

61. Based upon the violations of Tenn. Code Ann. § 2-5-151 as alleged in Counts I and II of this Second Complaint, Mayor Littlefield is entitled to a declaration by this Court that

- (i) the statutory minimum number of signatures required for a recall election for Mayor Littlefield is established by Tenn. Code Ann. § 2-5-151(d), and the Election Commission has violated the provisions of Tenn. Code Ann. § 2-5-151 by establishing a lower minimum number of signatures required and by certifying a recall petition based upon this lower minimum number of signatures.
- (ii) the Election Commission may not schedule and hold an election to select a new mayor for the City of Chattanooga on August 2, 2012, or on any other date, as the office of Mayor has not been vacated;
- (iii) the Election Commission may not certify, pursuant to Tenn. Code Ann. § 2-5-151(h), and may not count toward applicable minimum signature requirements, petition signatures that are not dated as required by Tenn. Code Ann. § 2-5-151(e)(4);

- (iv) the Election Commission may not certify a petition form that does not comply with the requirements of Tenn. Code Ann. § 2-5-151, and it may not count toward the applicable minimum signature requirements, any signatures on a petition that does not comply with such requirements;
- (v) the Election Commission may not certify, pursuant to Tenn. Code Ann. § 2-5-151(h), and may not count toward applicable minimum signature requirements, petition signatures that are not affixed to the full text of the question whether Mayor Littlefield should be recalled as Mayor of the City of Chattanooga;
- (vi) the Election Commission may not certify, pursuant to Tenn. Code Ann. § 2-5-151(h), and may not count toward applicable minimum signature requirements, signatures on petitions that are inconsistent with the form of the petition approved by the Election Commission; and
- (vii) the Election Commission may not certify, pursuant to Tenn. Code Ann. § 2-5-151(h), and may not count toward applicable minimum signature requirements, signatures on petitions that contain an incorrect description of the recall process.

62. Mayor Littlefield is entitled to have this Court enjoin the Election Commission, both temporarily and permanently, from acting contrary to the requirements of Tenn. Code Ann. § 2-5-151 and other applicable law, and from holding an election on August 2, 2012, or on any other date to select a new mayor for the City of Chattanooga.

WHEREFORE, Mayor Littlefield respectfully prays for the following relief:

1. That the Court issue a declaratory judgment, finding that:
 - (a) As to Count I, the statutory minimum number of signatures required for a recall election for Mayor Littlefield is established by Tenn. Code Ann. § 2-5-151(d), and

that the Election Commission has violated the provisions of Tenn. Code Ann. § 2-5-151 by establishing a lower minimum number of signatures required and by certifying a recall petition based upon this lower minimum number of signatures.

(b) As to Count II, the Election Commission has violated Tenn. Code Ann. § 2-5-151, in that

- (i) the Election Commission has scheduled and decided to hold an election to select a new mayor for the City of Chattanooga on August 2, 2012, despite the fact that the office of Mayor has not been vacated;
- (ii) contrary to Tenn. Code Ann. § 2-5-151(h), the Election Commission has certified, and counted toward applicable minimum signature requirements, petition signatures that are not dated as required by Tenn. Code Ann. § 2-5-151(e)(4);
- (iii) contrary to Tenn. Code Ann. § 2-5-151, the Election Commission has certified a petition form that does not comply with the requirements of State law, and that it has unlawfully counted toward the applicable minimum signature requirements signatures on petitions that do not comply with such requirements;
- (iv) contrary to Tenn. Code Ann. § 2-5-151(h), the Election Commission has certified, and counted toward minimum signature requirements, petition signatures that are not affixed to the full text of the question whether Mayor Littlefield should be recalled as Mayor of the City of Chattanooga;
- (v) contrary to Tenn. Code Ann. § 2-5-151(h), the Election Commission has certified, and counted toward minimum signature requirements, signatures

on petitions that are inconsistent with the form of the petition approved by the Election Commission; and

(vi) contrary to Tenn. Code Ann. § 2-5-151(h), the Election Commission has certified, and counted toward applicable minimum signature requirements, signatures on petitions that contain an incorrect description of the recall process.

(c) The actions of the Election commission, taken at its meeting on November 17, 2011, which approved petitions calling for the recall of Mayor Littlefield and setting a recall election for August 2, 2012, are void.

(d) The Election Commission is prohibited from taking any action in further violation of the injunction issued by the Circuit Court in its Memorandum Opinion entered September 8, 2010; and

2. That, pursuant to Tennessee Rules of Civil Procedure 65.01, 65.03, and 65.04, the Court issue a temporary and permanent injunction after hearing, to enjoin the Election Commission from placing on the ballot for the election to be held in August 2, 2012, any question, issue, or election regarding whether Mayor Littlefield shall be recalled from the office of Mayor of the City of Chattanooga or whether a new mayor shall be elected. For purposes of the injunction sought, the term "Petition" means the petitions in whatever form referencing the recall of Mayor Ron Littlefield, submitted prior to the August 30, 2010 deadline established by the Election Commission.

3. That the Court grant Mayor Littlefield such other, further and general relief to which he may be entitled.

4. That the Court tax all costs and expenses of this action, including attorneys' fees and discretionary costs, against the Election Commission.

THIS IS THE SECOND APPLICATION FOR EXTRAORDINARY RELIEF.

Respectfully submitted,

CHAMBLISS, BAHNER & STOPHEL, P.C.

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