Robyn M. Brody (ISB No. 5678)
Brody Law Office, PLLC
P.O. Box 554
Rupert, ID 83350
Telephone: (208) 434-2778
Facsimile: (208) 434-2780
robynbrody@hotmail.com

J. Justin May (ISB No. 5818)
May, Browning & May, PLLC
1419 W. Washington
Boise, Idaho 83702
Telephone: (208) 429-0905
Facsimile: (208) 342-7278
jmay@maybrowning.com

Fritz X. Haemmerle (ISB No. 3862)
Haemmerle & Haemmerle, PLLC
P.O. Box 1800
Hailey, ID 83333
Telephone: (208) 578-0520
Facsimile: (208) 578-0564
fxh@haemlaw.com

Attorneys for Rangen, Inc.

BEFORE THE DEPARTMENT OF WATER RESOURCES

OF THE STATE OF IDAHO

IN THE MATTER OF THE PETITION FOR DELIVERY CALL OF RANGEN, INC.'S WATER RIGHT NOS. 36-02551 & 36-07694 (RANGEN, INC.)	Docket No. CM-DC-2011-004 **RANGEN, INC.'S RESPONSE IN OPPOSITION TO IGWA'S SECOND PETITION TO STAY CURTAILMENT**

COMES NOW, Rangen, Inc. ("Petitioner" or "Rangen"), by and through its attorneys, and hereby submits the following response in opposition to *IGWA's Second Petition to Stay Curtailment, and Request for Expedited Decision*, filed by the Idaho Ground Water Appropriators, Inc. (IGWA) on April 17, 2014.

I. INTRODUCTION AND BACKGROUND

On February 12, 2014, IGWA filed its first *Petition to Stay Curtailment* asking the Director to enter an order staying curtailment during the 2014-2015 growing season. *See*

IGWA's Petition to Stay Curtailment. The Director granted IGWA's first request because IGWA filed a mitigation plan which the Director found, on its face, appeared to satisfy IGWA's mitigation requirement for the 2014 growing season. The Order granting the stay stated: "Cumulatively, the proposed measures, once implemented, will fully satisfy the requirements of the Director's Order and it appears that IGWA will be able to demonstrate that it has satisfied the requirement for direct delivery of water to Rangen." *See Order Granting IGWA's Petition to Stay Curtailment*, p. 3. The Order cautioned, however: ***"Ground water users are advised that in the event the mitigation plan is not approved, the curtailment order will go into effect immediately."*** *Id.*, p. 5.

The Director held an expedited hearing on IGWA's Mitigation Plan on March 17-19, 2014. At the start of that hearing the Director granted Rangen's Motion to Dismiss Proposals 4 and 5 of IGWA's first Mitigation Plan because they exceeded the scope of the Director's legal authority. On April 11, 2014, the Director issued an Order rejecting Proposals 3 (proposed assignment of IGWA's Application for Permit for talus slope water), 6 (cleaning, deepening or enlarging the Martin-Curren Tunnel), 7 (construction of a horizontal well), 8 (over-the-rim delivery system), and 9 (pump back and aeration system). The Director did, however, give IGWA credit for mitigation activities (Proposal 1) and water delivered to Butch Morris through the Sandy Pipeline (Proposal 2). Even after giving IGWA all of these credits, the Director found that IGWA has not satisfied its obligation for the delivery of water to Rangen (either steady state impact of 9.1 cfs or direct flow of 3.4 cfs to the Martin-Curren Tunnel). The Director narrowed the scope of the curtailment order considerably to reflect the credits IGWA has been given. The new curtailment Order changes the curtailment priority date from 1962 to 1978 and gives IGWA the opportunity to further reduce the number of effected rights by moving the curtailment priority

date to 1983 if IGWA delivers a written agreement with Butch Morris that Morris will not take any water from the Martin-Curren Tunnel. The Director has given the ground water users three weeks to comply with the new curtailment order.

Despite IGWA's failure to satisfy its water delivery obligations and the narrowed scope of the Director's curtailment order, IGWA is now seeking a stay that would enjoin curtailment not only during the 2014-2015 growing season as IGWA first proposed, but now the entire time this matter is on appeal. IGWA's request should be denied because: (1) an unapproved mitigation plan cannot be used to allow out-of-priority diversions and IGWA is not likely to obtain approval for its Tucker Springs Mitigation Plan; (2) IGWA's application for a permit to use the talus slope water cannot be used as the basis for the issuance of a stay; (3) junior-priority groundwater pumpers have had ample opportunity to prepare for this curtailment; (4) the risk of curtailment of a junior-priority ground water right during a time of shortage is a risk that Idaho water users knowingly undertake; and (5) the injury to Rangen caused by junior-priority groundwater pumping is ongoing and cumulative and the Director's revised curtailment order has been narrowly crafted to address the amount of water that would accrue to Rangen during the 2014-2015 season. Rangen respectfully requests that IGWA's Second Petition to Stay Curtailment be denied.

II. LEGAL STANDARD

Once the Director makes a determination of material injury like he has in Rangen's delivery call, Rule 40 of the Conjunctive Management Rules dictates that the Director shall either: (1) "Regulate the diversion and use of water in accordance with the priorities of rights of the various surface or ground water users who rights are included within the district, . . ." or (2) Allow out-of-priority diversion of water by junior-priority ground water users pursuant to a mitigation plan that has been approved by the Director." IDAPA 37.03.11.040.01. To lessen the

economic impact the Director may, in specified circumstances, phase in the curtailment over a period up to 5 years. *Id.*

The Idaho Supreme Court recently held that the "[t]he Conjunctive Management Rules require that out-of-priority diversions only be permitted pursuant to a properly enacted mitigation plan." *In the Matter of Distribution of Water to Various Water Rights*, ___ Idaho ___, ___ P.3d ___(2013 Opinion No. 134).

IGWA's present motion seeks a stay of the Director's curtailment order to allow out-of-priority diversion while this case is on appeal without the approval of a mitigation plan that satisfies IGWA's direct delivery of water obligations. In support of its request, IGWA relies upon IDAPA 37.01.01.780, which provides generally that "[a]ny party or person affected by an order may petition the agency to stay any order, whether interlocutory or final." In the context of a petition for review, Idaho Code § 67-5274 similarly provides that "[t]he agency may grant, or the reviewing court may order, a stay upon appropriate terms." I.C . § 67-5274. This language provides little, or no, guidance as to what might be the appropriate terms for a stay that would be consistent with the Conjunctive Management Rules. In the decision granting IGWA's first *Petition to Stay Curtailment*, the Director ruled that he would consider the following factors: (1) the likelihood the moving party will prevail on appeal or in another pending proceeding; (2) whether denial of the stay will harm the moving party; and (3) whether granting the stay will cause irreparable harm to the non-moving party. *See Order Granting IGWA's Petition to Stay Curtailment.* These factors warrant a denial of *IGWA's Second Petition to Stay Curtailment.*

III. ARGUMENT

IDWR adopted the Conjunctive Management Rules in 1994. Over the past twenty years surface water users have filed delivery calls against junior-priority groundwater rights and curtailment orders have been issued, but the reality is that actual curtailment in these types of situations has not yet occurred and some even question whether conjunctive management is a reality in Idaho. *See, e.g.*, presentation titled "Conjunctive Management: Science or Fiction?"

given by Chuck Brendecke at Idaho Water User's Association 18th Annual Water Law and Resource Issues Seminar in 2001 (Hearing Exhibit 2409). While the effect of Idaho's long-standing, constitutionally mandated prior appropriation doctrine can be harsh (*see*, *American Falls Reservoir District No. 2 v. Idaho Dep't of Water Resources*, 143 Idaho 862, 869 153 P.3d 433, 440 (2007)), curtailment orders have to be enforced where material injury has been found or else conjunctive management will indeed be fiction.

A. IGWA's Tucker Springs Mitigation Plan Cannot be the Basis of a Stay and Has the Same Defects as Proposal No. 8 of IGWA's First Mitigation Plan.

IGWA contends that the Director's curtailment order should be stayed during the time this case is on appeal because it would give the Director time to rule on IGWA's Tucker Springs Mitigation Plan. *See IGWA's Second Mitigation Plan* filed on March 10, 2014. There are two problems with IGWA's position.

First, the Director should not grant a stay simply because IGWA has submitted a mitigation plan. As explained above in the section addressing the legal standard that is applicable to *IGWA's Second Petition to Stay Curtailment*, the Idaho Supreme Court recently held that "[t]he Conjunctive Management Rules require that out-of-priority diversions only be permitted pursuant to a properly enacted mitigation plan." *See In the Matter of Distribution of Water to Various Water Rights*, ___ Idaho ___, ___ P.3d ___ (2013 Opinion No. 134). In that case the Director allowed out-of-priority diversions pursuant to "replacement water plans," which were not subject to the procedural requirements of a mitigation plan. "The Director reasoned that approval as a mitigation plan would require curtailment of junior ground water users without a hearing because they could not formulate a mitigation plan until they knew how much water would be owed to the [senior water user]." *Id.* The District Court determined that "replacement water plans permitted the rules governing mitigation plans to be circumvented."

The Supreme Court "affirm[ed] the district court's holding that the Director abused his discretion by failing to comply with the procedural framework applicable to mitigation plans when he approved replacement water plans." *Id.* Based on the Supreme Court's ruling and the plain language of CM Rule 43, the only way to grant IGWA the relief it is requesting (i.e., allow out-of-priority junior groundwater pumping) is to rule on the merits of its Second Mitigation Plan and find that it satisfies IGWA's water delivery obligations (either the 9.1 cfs steady state impact or the 3.4 cfs direct flow). Until that happens, the Director has an obligation to ensure that out-of-priority groundwater pumping does not take place.

Second, even if the Director could use the submission of an unapproved mitigation plan as the basis to stay curtailment, IGWA's Second Mitigation Plan has the same defects as Proposal No. 8 of IGWA's first Mitigation Plan and is not likely to be approved. A hearing on IGWA's Second Mitigation Plan has not yet been set. While the Second Mitigation Plan identifies the source and amount of the proposed mitigation water (Tucker Springs), the plan does not contain any of the details necessary to evaluate whether it satisfies Rule 43 of the Conjunctive Management Rules as a mitigation plan. IGWA's Tucker Springs proposal is the same type of bare-bones proposal which IGWA submitted for conditional approval as part of its first Mitigation Plan. The Director rejected Proposal No. 8 for an over-the-rim delivery system and found that the lack of detail was fatal to the plan:

> IGWA cites the Director's approval of the over-the-rim plan in the Snake River Farms delivery call as support for its argument the Director should conditionally approve Proposal No. 8 and then allow IGWA to provide engineering and other plans at a later date. However, there are important distinctions between the progress IGWA had made in the over-the-rim plan when it was considered by the Department and this plan. At the time the hearing for the over-the-rim plan was heard, IGWA had exerted significant effort to justify the plan, including identifying water rights that would be acquired and wells that could be used, testing of water temperature, quality, and evaluating the reliability and biosecurity of the proposed pumping system. IGWA had also provided preliminary

> engineering plans. While the Director conditionally approved the over-the-rim plan, IGWA had taken significant steps towards the implementation of that plan. Here IGWA has not taken any steps toward implementation of this proposal.

Order Approving in Part and Rejecting in Part IGWA's Mitigation Plan; Order Lifting Stay Issued February 21, 2014, Amended Curtailment Order, p. 15.

IGWA has not provided any of the details necessary to evaluate the Tucker Springs Plan. While a hearing has not yet been held, it appears the Tucker Springs plan will be even more controversial than IGWA's first Mitigation Plan. The protest period ended approximately twelve days ago, and at this time there are five protestors including, Rangen, Buckeye Farms, Inc., Salmon Falls Land & Livestock Co., Big Bend Irrigation & Mining Co., Ltd. and Leo Ray. Aside from Rangen, these protestors are down-stream water users who would likely be injured if IGWA were allowed to proceed with a plan to divert the water from Tucker Springs through a lengthy pipeline and deliver it to Rangen over the canyon rim. Until IGWA demonstrates that its Tucker Springs proposal will deliver suitable replacement water to Rangen in the quantities that are necessary to satisfy its water delivery obligations, the Tucker Springs proposal cannot be used as a basis for staying curtailment.

B. IGWA's Application for Permit for the Talus Slope Water Cannot be Used as the Basis of Stay.

IGWA also argues that a stay should be granted while this matter is on appeal because it would give the Director time to rule on IGWA's application for permit on the talus slope water. As explained above, the CM Rules only allow out-of-priority pumping under an approved mitigation plan. IGWA tried to get its application for permit approved as part of its first mitigation plan and the Director unequivocally rejected that approach, finding:

> Pursuant to rule 43, the Director can approve proposal no. 3 only if the Director believes that the application can provide water to Rangen in the time of need, i.e., this year. The pending application cannot be prejudged in this

> proceeding. IGWA essentially asked the Director to prejudge the application. The Director declines to do so. The application seeks authorization to divert12 cfs from a point of diversion on the Rangen property. IGWA Ex. 1018 at 1. A map attached to the application shows the general area of the planned point of diversion. *Id.* at 4. The Department published notice of the application and the application was protested by Rangen. Rangen also filed a competing application and a transfer to address the point of diversion issue. The facts behind IGWA's application and the competing application and transfer are unique. ***Given the uncertainty of the application given the specific facts which have developed in this case, the Director concludes that it is too speculative to consider.***

Order Approving in Part and Rejecting in Part IGWA's Mitigation Plan; Order Lifting Stay Issued February 21, 2014; Amended Curtailment Order, p. 13 (emphasis added). IGWA now seeks to make an end-run around the ruling by using its pending application as the basis for a stay. If the Director would not grant direct relief from the curtailment order by approving a mitigation plan that included IGWA's talus slope permit, he should not grant indirect relief by issuing a stay on that basis.

C. Junior-Priority Ground Water Pumpers Have Had Ample Time to Prepare for the Curtailment Order.

Even though the Director's Amended Curtailment Order narrows the scope of curtailment considerably and gives IGWA the opportunity to even further reduce the number of curtailed junior rights, IGWA predicts widespread economic devastation caused by curtailment without submitting any evidence to support its position. The fact that a water right appurtenant to a particular piece of land is curtailed does not mean that the land, in fact, will remain idle. In fact, there can be multiple rights appurtenant to a piece of land and farmers often have multiple places of use and points of diversion that can be used to keep land productive. While Rangen understands that the Director's order is likely to result in some acres being idled, IGWA's prediction that ". . . loans will go into default, jobs will be lost, cities will be unable to provide services, businesses will close, and land will be foreclosed on" is unsubstantiated rhetoric.

The reality is that IGWA and the ground water users it represents have had years to prepare for the curtailment that has been ordered. Rangen's delivery call has been pending for more than two and a half years. In May 2012, Rangen requested that junior-priority groundwater pumpers be given notice of possible curtailment so that they could be prepared. *See Transcript of May 24, 2012 Hearing* ("Transcript") attached as *Exhibit 3 to Affidavit of J. Justin May in Opposition to Idaho Cities' Petition for Limited Intervention and in Opposition to IGWA's Petition to Stay Curtailment ("May Affidavit").* The Director advised counsel for IGWA that it had the responsibility of notifying its members ahead of a formal hearing of the possibility of curtailment. The Director stated:

> ***My inclination is that we place that burden upon [counsel for IGWA]. She's representing those folks, the groundwater users and they should, I guess, have the ability to anticipate the possibility of curtailment.*** As we go through I'm not sure I want to be issuing a notice ahead of some decision. I think that's a little difficult. When the notices were issued I think they were issued after Carl Dreyer's [sic] initial orders, and so it was based on an order that had been issued, an evaluation of where we were at from the standpoint of storage in the system or, you know, what was predicted as a water year, and those were sent out as a result. But I think we're premature.

Transcript, p. 44, lines 10-22 (emphasis added).

IGWA unequivocally rejected the Director's determination:

> Ms. McHugh: *Just for the record, we aren't planning to send out any notices.*
>
> Mr. Haemmerle: You've got a lot of confidence. That's good.
>
> Ms. McHugh: I'll represent the IGWA ground water appropriators and the board, but we're not going to send out notices to individual groundwater users.

Transcript, p. 44, line 23 – p. 45, line 4. After this exchange, the Director commented that everyone needed to be prepared for the possibility of an April 1st curtailment order. *See Transcript*, p. 45, lines 5-13.

In the Fall of 2012, the Director again made it clear to IGWA that its members needed to be prepared for a curtailment order even if it were entered at the beginning of an irrigation season. On September 26, 2012, IGWA filed a *Motion to Continue Hearing and Request for Expedited Decision* seeking to delay the hearing date in this matter from January 28, 2013 to March 11, 2013. Rangen opposed that motion arguing that:

> IGWA is looking for any way to delay the hearing of this matter because even a slight delay will probably mean that curtailment will not be ordered in 2013 even if Rangen prevails on its material injury claim. The Director has made it clear that April 1 is the "drop dead" date for ordering curtailment and that he must have time to issue a decision before that date or curtailment will not be ordered.

Response in Opposition to IGWA's Motion to Continue Hearing and Request for Expedited Decision, p. 18. Following the discovery of the so-called Mud Lake error in October 2012, the Director issued an Order suspending the hearing in this matter "until further notice." In that Order the Director stated:

> The Director must use the best available science, and at the same time must also protect senior-priority rights by enforcing an order finding material injury. Therefore, ***the parties should be fully aware that if material injury is found, the order finding material injury will be enforced, regardless of the time of year in which it is issued.***

Order Suspending Hearing and Setting Status Conference, p. 2 (emphasis added).

When the Director issued the stay of the curtailment order in February, 2014, he again told IGWA that if a mitigation plan were not approved, the curtailment would take effect immediately. The Director ruled: ***"Ground water users are advised that in the event the mitigation plan is not approved, the curtailment order will go into effect immediately."*** *Order Granting IGWA's Petition to Stay Curtailment*, p. 5.

While Rangen understands that curtailment can be harsh, the reality is that Idaho water users have been dealing with curtailment in times of shortage for decades and understand the

risks involved. Tim Deeg, the Chairman of the Board of IGWA, testified at the hearing on Rangen's delivery call that he knows that Idaho is a prior appropriation state. (Tr., p. 1747, l. 18-21). He admitted that Idaho farmers understand that curtailment is a risk they take if a junior user is causing harm to a senior user. (Tr., p. 1748, l. 1-4). Deeg also admitted that junior-priority groundwater pumping in the Eastern Snake Plain Aquifer impacts Rangen's spring flows. (Tr., p. 1750, l. 2-12). Deeg acknowledged that farmers who have late water rights understand that there is a risk that senior users like Rangen will call for their water. (*Id.*). In fact, farmers in Southern Idaho deal with shortages just about every year. The farmer who uses surface water from the Big Wood faces curtailment just about every year. The only difference between him and the groundwater pumpers in this case is that he usually only has 2-3 days to respond to the water master's notice that his water use is being curtailed. In this case, the groundwater users have been on notice for nearly two and a half years.

Even though groundwater users understand the risks of curtailment and have been given another three weeks to prepare for the narrowly constructed curtailment that has been ordered in this case, IGWA still complains that it would be unduly harsh to enforce the Director's order because of the harm that may be done to junior pumpers. There should be no dispute that harm will be done to Rangen if the stay is granted while this case is on appeal since the Director has already found that Rangen is being materially injured by junior-priority groundwater pumping. The Idaho Supreme Court has made it clear that if there is any risk of error in the administration of water rights, the risk should be borne by the junior user, not the senior:

> The application of the clear and convincing standard of proof only makes sense from a common sense perspective. If the Director determines that a senior can satisfy the decreed purpose of use on less than the decreed quantity reflected, he needs to be certain to a standard of clear and convincing evidence. In making a determination of whether or not to regulate juniors, the Director is required to evaluate whether the quantity available meets or exceeds the quantity the senior

> can put to beneficial use. If the Director regulates juniors to satisfy the senior's decreed quantity there is no risk of injury to the senior. **However, if the Director regulates juniors to satisfy a quantity less than decreed, there is risk to the senior that the Director's determination is incorrect. There is no remedy for the senior if the Director's determination turns out to be in error and the senior comes up short of water during the irrigation season. Any burden of this uncertainty should be borne by the junior....** [I]f the Director's determination is only based on a finding 'more probable than not.' The senior's right is put at risk and the junior is essentially accorded the benefit of uncertainty. The requisite high standard accords appropriate presumptive weight to the decree.

A&B Irrigation District v. IDWR, 153 Idaho 500, 517, 284 P.3d 225, 242 (2012) (emphasis added). The bottom line is that the Director has found that Rangen is being materially injured by junior-priority ground water pumping and has narrowly tailored a curtailment order that gives IGWA credit for all of its mitigation activities. The ground water pumpers have known for more than two and a half years that curtailment was a possibility and have had ample opportunity to prepare for this order. The risk of any error or harm in this process has to be shouldered by the junior users as a matter of law, not Rangen. As such, IGWA's Second Petition to Stay Curtailment should be denied.

D. Rangen continues to be materially injured by junior-priority ground water pumping.

In a somewhat confusing argument, IGWA insists that Rangen will actually benefit from the stay IGWA has requested because Rangen will receive more water. A stay of the curtailment order does not benefit Rangen in any way. In fact, it causes more harm. The issue of Rangen's use of the talus slope water has been addressed in a separate proceeding and is not at issue in this case. There is no validity to the assertion that Rangen benefits from the stay IGWA has requested. As such, IGWA's Second Petition to Stay Curtailment should be denied.

IV. CONCLUSION

The granting of a stay in these circumstances would be inconsistent with the Conjunctive Management Rules and inconsistent with the Director's obligation to protect senior water rights. Rangen respectfully requests that IGWA's Second Petition to Stay Curtailment be denied.

DATED this 25 day of April, 2014.

MAY, BROWNING & MAY

By _____
J. Justin May

CERTIFICATE OF SERVICE

The undersigned, a resident attorney of the State of Idaho, hereby certifies that on the 25 day of April, 2014 he caused a true and correct copy of the foregoing document to be served by email and first class U.S. Mail, postage prepaid upon the following:

Original: Director Gary Spackman IDAHO DEPARTMENT OF WATER RESOURCES P.O. Box 83720 Boise, ID 83720-0098 deborah.gibson@idwr.idaho.gov	Hand Delivery U.S. Mail Facsimile Federal Express E-Mail	☑ ☐ ☐ ☐ ☑
Garrick Baxter IDAHO DEPARTMENT OF WATER RESOURCES P.O. Box 83720 Boise, Idaho 83720-0098 garrick.baxter@idwr.idaho.gov kimi.white@idwr.idaho.gov	Hand Delivery U.S. Mail Facsimile Federal Express E-Mail	☐ ☐ ☐ ☐ ☑
Randall C. Budge Thomas J. Budge RACINE, OLSON, NYE, BUDGE & BAILEY, CHARTERED	Hand Delivery U.S. Mail Facsimile Federal Express	☐ ☐ ☐ ☐

P.O. Box 1391 101 South Capitol Blvd, Ste 300 Boise, ID 83704-1391 Fax: 208-433-0167 rcb@racinelaw.net tjb@racinelaw.net bjh@racinelaw.net	E-Mail	☑
Sarah Klahn Mitra Pemberton WHITE & JANKOWSKI Kittredge Building, 511 16th Street, Suite 500 Denver, CO 80202 sarahk@white-jankowski.com mitrap@white-jankowski.com	Hand Delivery U.S. Mail Facsimile Federal Express E-Mail	□ □ □ □ ☑
Dean Tranmer CITY OF POCATELLO P.O. Box 4169 Pocatello, ID 83201 dtranmer@pocatello.us	Hand Delivery U.S. Mail Facsimile Federal Express E-Mail	□ □ □ □ ☑
John K. Simpson Travis L. Thompson Paul L. Arrington BARKER ROSHOLT & SIMPSON, L.L.P. 195 River Vista Place, Suite 204 Twin Falls, ID 83301-3029 Facsimile: (208) 735-2444 tlt@idahowaters.com jks@idahowaters.com pla@idahowaters.com	Hand Delivery U.S. Mail Facsimile Federal Express E-Mail	□ □ □ □ ☑
W. Kent Fletcher FLETCHER LAW OFFICE P.O. Box 248 Burley, ID 83318 wkf@pmt.org	Hand Delivery U.S. Mail Facsimile Federal Express E-Mail	□ □ □ □ ☑
Jerry R. Rigby Hyrum Erickson Robert H. Wood RIGBY, ANDRUS & RIGBY, CHARTERED 25 North Second East Rexburg, ID 83440 jrigby@rex-law.com herickson@rex-law.com rwood@rex-law.com	Hand Delivery U.S. Mail Facsimile Federal Express E-Mail	□ □ □ □ ☑
Gary Lemmon Blind Canyon Aquaranch, Inc.	Hand Delivery U.S. Mail	□ □

2757 South 1050 East Hagerman, ID 83332 glemmon@northrim.net	Facsimile ☐ Federal Express ☐ E-Mail ☑

J. Justin May