

FILED

IN THE DISTRICT COURT OF THE CHEROKEE NATION

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Robin Carter Mayes,)
Candidate at Large, Pro Se)
)
Petitioner,)

CLERK OF DISTRICT COURT
TODD HEMBREE
CHEROKEE NATION
CLERK

v.)

Case No. CV-17-273

Cherokee Nation Election Commission,)
Cherokee Nation Office of the Attorney)
General, TODD HEMBREE, an individual,)
SHAWNA CALICO, an individual,)
TERESA HART, an individual, CAROLYN)
ALLEN, an individual, PAMELA SELLERS,)
an individual, JOHN DOE, unknown)
individuals.)
Respondents.)

**SPECIAL LIMITED ENTRY OF APPEARANCE AND
MOTION TO DISMISS AMENDED PETITION**

Respondents, Cherokee Nation Office of the Attorney General (“OAG”) and Cherokee Nation Attorney General, Todd Hembree (“AG Hembree”) (collectively, “AG Respondents”), by and through the undersigned counsel, appears specially and for the limited purpose of this filing only, and without waiving any positions or defenses and/or objections, and appears only for the purpose of moving to dismiss this lawsuit for failure to state a claim for which relief can be granted, lack of jurisdiction and the additional reasons set forth below, pursuant to Rule 123 of the Rules for the District Court of the Cherokee Nation. In support of this motion, AG Respondents show the Court as follows:

INTRODUCTION

Though the structure has changed, the substance remains the same in Petitioner Robin Carter Mayes' ("Mayes") Amended Petition, filed on August 25, 2017, wherein he again alleges general grievances, none of which have any basis in law or fact. Mayes asserts no new claims, nor does he assert any facts not alluded to previously in the original petition. Nonetheless, Mayes again requests this Court (1) declare LA-12-16, codified at Title 26, Section 11(C)(12)(f) unconstitutional; and (2) issue a writ of mandamus ordering the Cherokee Nation Election Commission to conduct a hearing where he can air his grievances regarding the 2017 General Election – neither of which the Court has the jurisdictional authority to do. For this reason, the Court must dismiss the Amended Petition.

The Office of the Attorney General & Attorney General Hembree

The OAG is a constitutionally-created department within the Executive Branch of the Cherokee Nation ("Nation"). Cherokee Const. art. XII, Sec. 13. The Attorney General and his/her assistants are duty-bound to represent the Nation in all criminal cases in the Nation's courts; in all civil actions where the Nation is a named party; and shall have other duties as the Council prescribes by law. *Id.* One such duty is to investigate and prosecute all actions, civil or criminal, relating to civil actions or crimes against or within the jurisdiction of the Nation in coordination with the Nation's Marshal Service, as well as any federal, state or local agency. 51 C.N.C.A § 105(B)(14). Thus, the OAG is the principal investigatory department in the Nation.

The Election Commission & Commissioners S. Calico, M. Calico, Hart, Allen & Sellers

The Cherokee Nation Election Commission ("Commission") is constitutionally-created, autonomous and permanent entity of the Nation. Cherokee Const. art. IX, Sec. 1. Though autonomous, the Commission is not a separate branch of the government. *See Id.* The

Commission is responsible for the administration of all the Nation's elections. *Id.* Of relevance to this case, the Tribal Council has directed the Commission to report "any accusations concerning campaign activities" to the OAG for investigation. 26 C.N.C.A. § 11(C)(12)(f). Should the Attorney General find merit to the allegations, a report is made to the Commission "for possible assessment of penalties and/or disqualification," pursuant to the Election Code. *Id.*

SUMMARY OF ARGUMENT

Mayes's first claim is against the Commission and its Commissioners; the second alleges that certain investigatory authority delegated to the OAG and AG Hembree is unconstitutional. As set forth below, Mayes's Amended Petition should be dismissed in its entirety for (1) failure to state a claim upon which relief may be granted; (2) lack of subject matter jurisdiction; (3) lack of standing; and (4) failure to serve any of the named Respondents with summons of the lawsuit.

As to the Commission, Mayes requests the Court issue a writ of mandamus ordering the Commission to conduct a hearing "regarding Petitioner's complaints and determination of the issues of whether or not the candidates interfered the [Commission] and election process and should be disqualified." (Pet. at ¶ 17.) Mayes erroneously cites Title 26, Section 38 in support. (Pet. at ¶ 17.) Contrary to Mayes's understanding, Section 38 provides a hearing for a candidate *accused* of interfering with an election, not an individual *alleging* interference. Moreover, Title 26, Section 101, *et seq.*, which provides a legally protected right to challenge an election based on allegations of interference and fraud, clearly provided Mayes with the remedy he now seeks the Court to order. The Court should not allow Mayes to circumvent Cherokee law simply because he chose not to follow the proper procedure. The Court must dismiss the first claim.

As to the claims implicating the OAG, AG Hembree and the purported investigator, Mayes asserts that a provision of the Nation's Election Code is inconsistent with the Cherokee

Constitution. (Pet. at ¶ 18.) Specifically, Title 26, Section 11(C)(12)(f), which directs the Commission to report accusations concerning campaign activities to the OAG for subsequent investigation. (Pet. at ¶ 15.) Mayes contends incorrectly that the provision directing the OAG to investigate accusations of campaign irregularities is unconstitutional because the Election Commission is autonomous by constitutional provision. (Pet. at ¶ 12-13.) Mayes further alleges that AG Hembree's investigation of the alleged campaign irregularities constituted interference in the 2017 General Election. (Pet. at ¶ 14.) As a result, Mayes contends he is entitled to a declaratory judgment finding Title 26, Section 11(C)(12)(f) unconstitutional.

As a sovereign, the Nation and its agencies and officials enjoy immunity from suit, unless the United States Congress has abrogated its immunity or the Nation explicitly consents to be sued. It has not done so here. Mayes, no stranger to the Cherokee Courts, mistakenly believes the Cherokee Nation Declaratory Judgment Act, LA-06-09, codified at Title 12, *alone* is sufficient to give this Court subject-matter jurisdiction. It is not. Mayes fails to cite any other jurisdictional statute, which permits him to maintain a lawsuit against the OAG – a department of the Nation that enjoys sovereign immunity from this type of suit. Mayes additionally fails to establish he has standing to bring this action against the OAG and fails to plead a claim for relief. Moreover, Mayes cannot overcome the immunity AG Hembree enjoys as an appointed official of the Nation by merely naming AG Hembree in his individual capacity in the case caption when Mayes seeks to prevent AG Hembree from taking action in his *official* capacity in the future. Mayes is requesting the Court establish rights and order remedies that are simply not available under Cherokee law. The Court must dismiss the claim for declaratory relief.

ARGUMENTS & AUTHORITIES

I. Applicable Legal Standards

Rule 123 of the Cherokee Nation District Court Rules authorizes the Court to dismiss this proceeding for (1) lack of jurisdiction over the subject matter; (2) lack of jurisdiction over the person; (3) insufficiency of process or service thereof; or (4) failure to state a claim upon which relief can be granted. To the extent Cherokee law is silent, the Court shall apply Federal Rules of Evidence and/or Civil Procedure for guidance. LA-16-16, Section 5; *In re the Amendment and Adoption of District Court Rules and Procedures*, SC-AD-13-04 (2013).

II. The Court Must Dismiss the Action Because Mayes Fails to State a Claim for Which this Court Can Grant Relief

The court lacks jurisdiction over the matter because Mayes fails to plead facts sufficient to establish an “actual controversy,” as required by Title 12, Section 1203 – the statute upon which he basis his claim. Rule 123(4) of the District Court Rules empowers this Court to dismiss this proceeding for Mayes’s failure to state a claim upon which relief can be granted. “To survive a motion to dismiss, a complaint must contain sufficient factual matter, accepted as true, to state a claim to relief that is plausible on its face.” *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (internal quotation marks omitted). Plaintiffs must allege specific facts that would support the conclusion that they are entitled to relief. *Khalik v. United Air Lines*, 671 F.3d 1188, 1191 (10th Cir. 2012) (“[M]ere labels and conclusions . . . will not suffice.” (internal quotation marks omitted)).

The Cherokee Nation Declaratory Judgment Act, 12 C.N.C.A. § 1203, provides in pertinent part,

The District Court may, *in cases of actual controversy*, determine rights, status, or other legal relations, including but not limited to a determination of the construction or validity of . . . any statute, municipal ordinance, or other governmental regulation, whether or not other relief is or could be claimed . . . a

Court may refuse to make a determination where the judgment, if rendered, would not terminate the controversy, or some part thereof, giving rise to the proceeding.

Id. (emphasis added). Based on a plain reading of the statute, the threshold question the Court must determine in a declaratory action is whether a justiciable controversy exists. *See Schilling v. Rogers*, 363 U.S. 666, 677 (1960) (concluding the availability of declaratory relief “presupposes the existence of a judicially remedial right.”) Likewise, the right to a declaratory judgment is further limited by the phrase, “a Court *may refuse* to make a determination,” indicating the Court is competent to hear declaratory actions, but it is not required to do so. *Public Affairs Assoc., Inc. v. Rickover*, 369 U.S. 111, 112 (1962).

Here, Mayes fails to meet even the most basic of pleading requirements to establish that a justiciable controversy exists. As established in Part IV(a), *infra*, Mayes fails to adequately allege he has suffered an actual or threatened injury following the passage of Title 26, Section 11(C)(12)(f). Moreover, Mayes’s allegations that the OAG and/or AG Hembree has or will hinder *any* Cherokee citizen’s right to vote if it investigates election campaign irregularities is conclusory and speculative at best. And, Mayes makes no allegations that the OAG or AG Hembree hindered his right to vote in the 2017 General Election or interfered with the election in which he was a candidate.

In addition, no justiciable controversy can exist when there has been no invasion of a legally protected right. As explained in Part IV(b), *infra*, Title 26, Section 37(B) establishes a right for the *accused* candidate, not the *accusing* candidate, to a hearing and appeal when he or she has been accused of interference or improperly influencing an election. Mayes is the accusing candidate, not the accused. He is therefore not entitled to the hearing and appeal established by Section 37(B). Likewise, Section 38, the statute Mayes now cites in support of his claim, allows the Commission to hold a hearing for the candidate *accused* of interference, not the

candidate *alleging* interference. Furthermore, the Court cannot and should not reward Mayes for his attempt to circumvent the established procedures outlined in Title 26, Section 101, *et seq.*, which provide a legally protected right to challenge an election based on allegations of interference and fraud. In doing so, the Court would judicially create a legally protected right where none exists under Cherokee law.

As a result, the Court should not allow this case to proceed based on conclusory allegations and unwarranted deductions of facts or legal conclusions masquerading as facts. The Court must dismiss the action for failure to state a claim for which relief can be granted.

III. The Court Lacks Subject Matter Jurisdiction Over Mayes's Claims Against the OAG and AG HEMBREE

Mayes fails to cite any Cherokee law that grants this Court jurisdiction over the OAG or AG Hembree for the specific relief requested. Instead, Mayes states without further explanation that "this Court has jurisdiction of the subject matter and of the parties to this action." (Pet. at ¶ 2.) Rule 123(1) empowers the Court to dismiss this matter for lack of jurisdiction over the subject matter. The OAG's and AG Hembree's sovereign immunity is a threshold matter of subject matter jurisdiction, which must be addressed before any other issues. *See Saucier v. Katz*, 533 U.S. 194, 201 (2001), *receded from on other grounds by Pearson v. Callahan*, 555 U.S. 223 (2009). "Tribal sovereign immunity is a matter of subject matter jurisdiction, which may be challenged by a motion to dismiss . . ." *Miner Elec., Inc. v. Muscogee (Creek) Nation*, 505 F.3d 1007, 1009 (10th Cir. 2007). Mayes bears the burden of demonstrating subject-matter jurisdiction. *Packard v. Provident Nat'l Bank*, 994 F.2d 1039, 1045 (3d Cir.) (establishing burden for claims against the United States), *cert. denied*, 510 U.S. 964 (1993).

a. Mayes's declaratory judgment action against the OAG and AG Hembree is barred by sovereign immunity.

“It is well-established as a matter of Cherokee law and federal law that suits against the Indian tribes and in this instance, the Cherokee Nation, are permissible only when the tribe has waived sovereign immunity. *Littlejohn v. Smith et al.*, JAT-03-18, 2 (2004). Doctrines of tribal sovereign immunity require immediate dismissal of unconsented lawsuits against the Nation, its enterprises, agencies, agents, entities and departments possess sovereign immunity from suit. *See e.g., Santa Clara Pueblo v. Martinez*, 436 U.S. 49, 58 (1978), *Kiowa Tribe of Okla. v. Mfg. Tech., Inc.*, 523 U.S. 751, 754 (1998). “A waiver of sovereign immunity is an express statement that the Cherokee Nation consents to be sued.” *Mayes v. Smith*, JAT-01-12, 3 (2001). Here, Mayes has the burden of showing that the Nation has consented to suit. *United States v. Sherwood*, 312 U.S. 584, 586 (1941) (establishing burden for claims against the United States).

Mayes has failed to show that the Nation has consented to be sued for the specific relief he requests. Accordingly, the OAG – an agency of the Nation – is shielded by the Nation's sovereign immunity. Likewise, AG Hembree – an appointed official of the Nation – is also shielded by the Nation's sovereign immunity. Furthermore, Mayes cannot overcome the bar of sovereign immunity for AG Hembree by naming him in his individual capacity in the case caption. There is no basis for suing a government official for declaratory or injunctive relief in his or her individual and personal capacity. *Hatfill v. Gonzales*, 519 F.Supp.2d 13, 19 (D.D.C.2007); *accord Feit v. Ward*, 886 F.2d 848, 858 (7th Cir.1989). Indeed, inherent in the relief Mayes requests by seeking an order declaring Title 26, Section 11(C)(12)(f) unconstitutional is to prohibit AG Hembree from investigating election interference claims in the future. Therefore, only by acting in his *official* capacity as the Attorney General, not as an

individual acting *personally*, can he comply with a court declaration finding Section 11(C)(12)(f) unconstitutional, invalid and unenforceable. *Hatfill*, 519 F.Supp.2d at 26 (“[O]nly by acting as a government official (not as an individual acting personally), can a public official's compliance with a court decree remedy the governmental action, policy or practice that is being challenged.”) Thus, the goal served by asserting claims against AG Hembree in his individual capacity cannot be achieved because the relief requested seeks to conform AG Hembree’s conduct to Cherokee law, not recovery from AG Hembree personally.

b. The Declaratory Judgment Act does not waive sovereign immunity.

Mayes attempts to invoke this Court’s jurisdiction under the Cherokee Nation Declaratory Judgment Act, LA-06-09, codified at Title 12, §§ 1201-08; however, nothing in the Act provides the requisite waiver of sovereign immunity. While the Act does provide a mechanism for which a party may seek a determination of “rights, status, or other legal relations” including the “construction or validity of . . . any statute . . .,” there is nothing in the Act that expressly waives the Nation’s sovereign immunity. 12 C.N.C.A. § 1203. Indeed, the right to declaratory relief alone does not enlarge the jurisdiction of the Court; a petitioner must assert an independent basis for subject matter jurisdiction when initiating a case against the government. *Cardtoons, L.C. v. Major League Baseball Players Ass’n*, 95 F.3d 959, 964 (10th Cir. 1996) (citing *Skelly Oil Co. v. Phillips Petroleum Co.*, 339 U.S. 667, 671 (1950)) (internal citations omitted).

Furthermore, the only mention of the Nation or its entities is found in Section 1205(C). There, the Act provides “if a statute or regulation is alleged to be unconstitutional, the Attorney General of the Cherokee Nation shall also be served with a copy of the proceeding and entitled to be heard.” 12 C.N.C.A. § 1205(C). Thus, while the OAG must be served if a case implicates the

constitutionality of a statute or regulation, there is no waiver of the OAG's or AG Hembree's immunity from suit. Hence, the Act does not confer subject matter jurisdiction over Mayes's claims against the OAG or AG Hembree.

For these reasons, the Court must dismiss the action as to the OAG and AG Hembree because Mayes cannot overcome the bar of sovereign immunity.

IV. The Court Must Dismiss the Action Because Mayes Lacks Standing to Sue

This Court also lacks jurisdiction as a result of Mayes's failure to demonstrate any concrete injury in fact. It is well-established that standing is an essential and unchanging part of Cherokee law; it goes to the Court's very jurisdiction to hear the case. Cherokee Const., art. VIII, sec. 6; *see also Mayes v. Blackfox, et al.*, JAT-02-18 (2002) ("*Mayes* and *Phillips* read together, indicate that this Court will apply the standing doctrine, as developed in the federal system, as a guiding principle.")

In order to have standing, Mayes must have suffered an injury in fact – an invasion of a legally protected interest which is concrete and particularized, and actual or imminent, not conjecture or hypothetical. *See Mayes v. Thompson, et al.*, JAT-95-15, 10 (1995) ("A party only has standing if they can demonstrate a stake in the outcome" and "[t]he injury in fact must be actual or imminent, and cannot be too remote or speculative.") (internal citations omitted); *accord, Baker, et al. v. McKinley-Reynolds*, JAT-04-15; *John Cornsilk v. Meredith Frailey, et al.*, JAT-05-03; *In the Matter of McKinley & Reynolds*, JAT-04-15. "Moreover, the Court has never been willing to extend standing to individuals based solely on their 'citizenship' status." *Mayes*, JAT-95-15 at 10. (internal citations omitted). Mayes has failed to allege facts demonstrating the requisite injury.

a. Mayes fails to assert any particularized injuries that are “actual or imminent” and traceable to the OAG’s or AG Hembree’s actions.

Although Mayes asserts that Section 11(C)(12)(f) “severely and unfairly restricts Cherokee citizens from their right to due process,” Mayes fails to plead any facts that support this conclusion or explain, in other than the most conclusory fashion, how the alleged “interference” hindered or will hinder *any* Cherokee citizen’s right to vote. (Original Pet. at 2.)¹ Moreover, nothing in the Original Petition or Amended Petition states or suggests that Mayes himself was unable to vote because of the OAG’s or AG Hembree’s purported “interference.” Rather, his claims against the OAG and AG Hembree are nothing more than general and hypothetical grievances that, based on the Petition, may occur sometime in the future. Accordingly, Mayes fails to set forth any allegations which, if taken as true, would establish a causal nexus between the supposed harm suffered and alleged wrong doing of the OAG or AG Hembree. As a consequence, this Court must dismiss the Petition because Mayes lacks standing to bring the suit.

b. Mayes fails to assert an invasion of a legally protected interest.

To the extent Mayes alleges certain injuries to himself; those injuries do not establish standing. Title 26, Section 37(B) establishes the right to a hearing and an appeal for a candidate *accused* of interference and improper influences. 26 C.N.C.A. § 37(B) (providing the accused candidate, not the accuser, with reasonable notice of the charges and the opportunity to respond at a hearing as well as the right to appeal the Commission’s decision to the Supreme Court). Section 37(B) does not provide a right of a hearing and an appeal for a candidate *accusing* another candidate of interfering or improperly influencing a campaign. *Id.* Here, Mayes is the

¹ In his Amended Petition, Mayes “incorporates and re-alleges the factual allegations contained in Section II of the original Petition filed June 1, 2017.” (Pet. at ¶ 14.)

candidate making the accusations, not the candidate being accused. Thus, he is not the candidate Section 37(B) vests with the right of a hearing and appeal of an adverse decision.

Moreover, Section 38, which Mayes now cites in support of request to order the Commission to conduct a hearing, provides no legally protected interest. Instead, the hearing referenced in Section 38 is the hearing for the candidate *accused* of campaign interference under Section 37(B), not a candidate or individual *asserting* campaign interference. 26 C.N.C.A. § 38. In fact, nothing in Section 37(B), Section 38, the Election Code, or any other source of Cherokee law establishes such a right. To be sure, as an At-Large Candidate, Mayes did have the right to challenge the election results, pursuant to Title 26, Section 101 *et seq.*, “Challenges to Election Results.” In doing so, he could have lodged every complaint he now asserts, including fraudulent absentee voting, the validity of the election outcome and any other allegation necessitating a recount. 26 C.N.C.A. § 101. Instead, Mayes chose to usurp the established judicial process to satisfy his own personal curiosity instead of utilizing the remedy available to all disgruntled candidates. Moreover, Mayes is neither a resident nor a registered voter in District Four – the district in which the majority of his complaints are based. As such, he has no legally protected interest to establish the standing necessary to support his claims.

There can be no invasion of a legal protected right where no such right exists. As a result, the Court must dismiss the Petition because Mayes lacks standing to bring the suit.

V. The Court Lacks Jurisdiction to Issue a Writ of Mandamus Against the Commission

Along with his declaratory judgment action, Mayes filed a petition for writ of mandamus. There is no Cherokee law that authorizes this Court to issue such a writ. Indeed, the only Court in the Cherokee Nation with the authority to order a writ of mandamus is the Supreme Court. *Compare* Cherokee Const. art. VIII, sec. 4 (“[T]he Supreme Court shall have power to issue,

hear and determine writs of habeas corpus, mandamus, quo warranto, certiorari, prohibition and such other remedial writs as may be provided by law and may exercise such other jurisdiction as may be conferred by statute.”), *with* Cherokee Const. art. VIII, sec. 6 (“The District Courts of the Cherokee Nation shall be courts of general jurisdiction and shall be vested with original jurisdiction, not otherwise reserved to the Supreme Court . . .”).

Moreover, Mayes has not established that a writ of mandamus is necessary or appropriate in this case. The writ of mandamus “has traditionally been used in the federal courts only to confine an inferior court to a lawful exercise of its prescribed jurisdiction or to compel it to exercise its authority when it is its duty to do so.” *Kerr v. U.S. Dist. Court*, 426 U.S. 394, 402 (1976) (citations and quotations omitted). “The remedy of mandamus is a drastic one, to be invoked only in extraordinary situations.” *Id.* For a court to issue a writ of mandamus, the party seeking the writ must not have any “other adequate means to attain the relief” it desires, and must prove that its right to the writ is “clear and indisputable.” *Id.* at 403 (citation omitted). As established above, Mayes fails to cite any Cherokee law that establishes a clear and indisputable right to the relief he is requesting. For this reason, the Court must dismiss the Petition because it lacks jurisdiction to order the writ of mandamus.

VI. The Court Must Dismiss the Petition Because Mayes Has Failed to Serve Any of the Parties With a Summons of the Lawsuit

To date, Mayes has failed to serve any of the parties with summons of the lawsuit. To address the issue, the Court held a hearing on June 16, 2017 at which all named parties were present. Prior to the hearing, the OAG and the Commission filed separate motions asserting, among other arguments, that the Court must dismiss the Petition because Mayes failed to prove he served any of the parties with proper notice of this matter, pursuant to Rule 101 of the Court Rules of the District Court of the Cherokee Nation and Title 12, Section 1205(C) of the

Cherokee Nation Code. In its ruling, the Court found Rule 3(5), which speaks to filing documents by fax/email, “ambiguous and conflicts with the summons requirements of Cherokee Nation law and Federal Rules of Civil Procedure.” June 16, 2017 Order at 1. Based on this finding, the Court held there is no further need for summons since the OAG and the Commission had actual notice of the lawsuit and were present for the hearing, despite Mayes’s failure to serve either party with a summons prior to the hearing. *Id.*

For purposes of this Motion to Dismiss the Amended Complaint, the OAG maintains its objection to Mayes’s failure to serve the OAG with summons of the lawsuit pursuant to Rule 101 and 12 C.N.C.A. § 1205(C). Likewise, AG Hembree asserts his objection because Mayes has also failed to serve him with summons of the lawsuit. The OAG further renews and incorporates its arguments asserted in Part V of its Special Limited Entry of Appearance and Motion to Dismiss, filed on June 14, 2017; any and all arguments asserted in support of its insufficient service of process claim asserted at the June 16, 2017 Hearing; and its arguments asserted in its Special Limited Entry of Appearance and Amended Motion to Dismiss filed on July 6, 2017.

CONCLUSION

For the reasons discussed above, the Court should dismiss the Amended Petition for Writ of Mandamus and Declaratory Judgment.

Respectfully submitted,



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CERTIFICATE OF MAILING

I hereby certify that on the 2nd day of October, 2017, a true and correct copy of the above document was hand delivered, emailed or mailed with proper postage fully prepaid thereon, to the following:

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