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8 *Attorney for Plaintiffs*

9 MONTANA THIRD JUDICIAL DISTRICT COURT, DEER LODGE COUNTY

10	JOSHUA CYPHER and DISABILITY RIGHTS)	Cause No. DV-24-75
11	MONTANA)	
12)	
13	Plaintiffs,)	FIRST AMENDED COMPLAINT
14)	FOR INJUNCTIVE RELIEF AND
15	vs.)	DECLARATORY JUDGMENT
16)	
17	TONI HOFLAND, in her official capacity as)	
18	Deer Lodge County Clerk and Recorder and)	
19	Election Administrator,)	
20)	
21	<u>Defendant.</u>)	

22 **INTRODUCTION**

23 “[T]he vote is the most powerful instrument ever devised by human beings for
24 breaking down injustice and destroying the terrible walls which imprison men
25 because they are different from others.”¹

1. This case is about whether patients at the Montana State Hospital (“the State
Hospital” or “the Hospital”) enjoy the fundamental right to vote.

¹ Lyndon B. Johnson, Remarks in the Capitol Rotunda at the Signing of the Voting Rights Act, Online by Gerhard Peters and John T. Woolley, The American Presidency Project, <https://www.presidency.ucsb.edu/node/241195>.

- 1 2. Mr. Cypher and most other patients at the Hospital are involuntarily² detained by the
2 state at this Hospital for the purpose of treatment. The Hospital is so poorly run by
3 our state government that the federal government revoked its certification and
4 removed all Medicare and Medicaid payments to the Hospital “due to [the Hospital’s]
5 failure to meet Medicare’s basic health and safety requirements.”³
- 6 3. Over the past several years, much has been said by federal officials, the state
7 executive office, state legislators, and state judges about how poorly Montana is
8 doing running this facility and what the state must do to fix it. However, patients of
9 the Hospital most directly impacted by its poor operations have been absent from
10 those policy conversations.
- 11 4. With the assistance of Plaintiff Disability Rights Montana,⁴ several Montana State
12 Hospital patients attempted to register and request absentee ballots so they could vote
13 in the upcoming election. The government’s response has been to further keep them
14 silent by denying them their fundamental right to vote.
- 15 5. In order to preserve the fundamental right to vote, Plaintiffs respectfully ask the Court
16 to declare that:
- 17 a. A person involuntarily committed by a Montana court, whether criminally or
18 civilly, is not “adjudicated of unsound mind” and retains their right to vote in
19 Montana provided they meet the other requirements to vote in Montana unless

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21 ² In this case the term “involuntary” is used to refer to individuals who are either civilly or criminally committed to
the Montana State Hospital.

22 ³ Centers for Medicare & Medicaid Services, *Notice to Public of Montana State Hospital Mandatory Termination*
(Apr. 8, 2022), <https://www.cms.gov/files/document/montana-montana-state-hospital-public-notice-04082022.pdf>

23 ⁴ Section 208 of the Voting Rights Act of 1965, as amended, provides “[a]ny voter who requires assistance to vote
24 by reason of blindness, disability, or inability to read or write may be given assistance by a person of the voter’s
25 choice, other than the voter’s employer or agent of that employer or officer or agent of the voter’s union.” 52 U.S.C.
§ 10508.

1 the individual has been specifically “adjudicated to be of unsound mind” by a
2 court of competent jurisdiction based on competent findings; and

- 3 b. The Montana State Hospital is not a “penal institution” and therefore patients
4 at Montana State Hospital who meet the other requirements to vote in
5 Montana are not barred from registering to vote or voting on the ground that
6 the individual is “serving a sentence for a felony in a penal institution.”

7 **JURISDICTION AND VENUE**

- 8 6. The Court has jurisdiction over this matter under Mont. Code Ann. § 3-5-302(b) and
9 (c).
10 7. This Court has jurisdiction to grant declaratory relief pursuant to Mont. Code Ann §
11 27-8-201, et seq. and injunctive relief pursuant to Mont. Code Ann § 27-19-101.
12 8. Venue is proper before this Court under Mont. Code Ann. § 25-2-125 because the
13 actions by Defendant Hofland, a public officer, occurred in Deer Lodge County and
14 under § 25-2-118(a) because the Defendant resides in Deer Lodge County.
15

16 **PARTIES**

17 *Plaintiff Joshua Cypher*

- 18 9. Joshua Cypher is a patient at Montana State Hospital.
19 10. On April 3, 2024 this Court sentenced Plaintiff for the crime of felony aggravated
20 assault in case number DC-22-93.
21 11. The Court committed Plaintiff to the Hospital. Judgment, p. 4, *State v. Cypher*
22 (Mont. 3rd Jud. Dist. Ct., April 8, 2024) (No. DC-22-93).
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1 *Plaintiff Disability Rights Montana*

2 12. Disability Rights Montana is a nonprofit organization headquartered in Helena,
3 Montana. Disability Rights Montana’s mission is to protect and advocate for the
4 human, legal, and civil rights of Montanans with disabilities while advancing dignity,
5 equality, and self-determination.

6 13. Disability Rights Montana is the federally mandated civil rights protection and
7 advocacy system (P&A) for Montana authorized under multiple federal laws,
8 including the Developmental Disabilities Assistance & Bill of Rights Act of 2000, 42
9 U.S.C §§ 15041, et seq., and the Protection and Advocacy for Individuals with
10 Mental Illness Act (“PAIMI Act”), 42 U.S.C §§ 10801, et seq.

11 14. Congress enacted the PAIMI Act with the specific purposes of “ensur[ing] that the
12 rights of individuals with mental illness are protected[]” and establishing a system to
13 “protect and advocate [for] the rights of . . . [individuals with mental illness] through
14 activities to ensure the enforcement of the Constitution and Federal and State
15 statutes.” *Id.* at § 10801(b). The Act specifically defines “individual with mental
16 illness” to include a person “who has a significant mental illness or emotional
17 impairment . . . and . . . who is an inpatient or resident in a facility rendering care or
18 treatment.” *Id.* at § 10802(4)

19 15. Under the PAIMI Act, Disability Rights Montana is authorized to “investigate
20 incidents of abuse and neglect of individuals with mental illness,” *id.* at §
21 10801(b)(2)(B), and is required to “pursue administrative, legal, and other appropriate
22 remedies to ensure the protection of individuals with mental illness who are receiving
23 care or treatment in the State,” *id.* at § 10805(a)(1)(B).

1 16. Under what is commonly called P&A “access authority,” Disability Rights Montana
2 must have access “to facilities in the State providing care or treatment,” the
3 individuals receiving treatment there, and, under specified conditions, their records.
4 *See id.* at § 10805(a)(3–4); 42 C.F.R. § 51.42(b) (“A P&A system shall have
5 reasonable unaccompanied access to public and private facilities and programs in the
6 State which render care or treatment for individuals with mental illness, and to all
7 areas of the facility which are used by residents or are accessible to residents.”).

8 17. P&As “are responsible for enforcing federal and state law on behalf of individuals
9 with disabilities who otherwise would face perhaps insurmountable obstacles to
10 seeing their rights enforced and their interests protected.” *Ind. Prot. & Advoc. Servs.*
11 *Comm’n v. Comm’r, Ind. Dep’t of Corr.*, 642 F. Supp. 2d 872, 876 (S.D. Ind. 2009).
12 In addition to pursuing the rights of those it protects, a P&A system may “press[] its
13 own rights.” *Va. Off. for Prot. & Advoc. v. Stewart*, 563 U.S. 247, 251 (2011).

14 18. Under its access authority Disability Rights Montana actively monitors the Hospital.
15 Disability Rights Montana represents and advocates for the rights of individuals with
16 mental illness from across Montana who are, or could be, involuntarily committed to
17 the Hospital.

18 19. Additionally, under the PAIMI Act, Disability Rights Montana is required to maintain
19 a board of directors that includes “a significant representation of individuals with
20 mental illness who are, or have been eligible for services, or have received or are
21 receiving mental health services” and their “family members, guardians, advocates, or
22 authorized representatives.” *See* 42 C.F.R. § 51.22(b)(2). Disability Rights Montana
23 must also maintain an advisory council composed of at least 60% individuals who
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1 have received or are receiving mental health services and their family members. *See*
2 42 U.S.C § 10805(a)(6). Disability Rights Montana’s advisory council includes
3 patients at the Hospital, including patients convicted of felonies.

4 *Defendant Toni Hofland*

5 20. Defendant Hofland is the duly appointed election administrator for Deer Lodge
6 County, “responsible for the administration of all procedures relating to registration
7 of electors and conduct of elections. . . .” *See* Mont. Code Ann. § 13-1-301(2).
8 Defendant Hofland is sued in her official capacity.

9 **FACTS COMMON TO ALL COUNTS**

10 21. “[T]he right to vote is fundamental.” *Montana Democratic Party v. Jacobsen*, 2022
11 MT 184, ¶ 19, 410 Mont. 114, 127, 518 P.3d 58, 65 (hereinafter, *Jacobsen I*)
12 (abrogated in part on other grounds by *Montana Democratic Party v. Jacobsen*, 2024
13 MT 66, 545 P.3d 1074 (hereinafter, *Jacobsen II*)).
14
15 22. “[T]he right to vote freely and unimpaired preserves—and is a bulwark for—other
16 basic civil and political rights.” *Jacobsen II*, ¶ 23. “Suffrage is the basic right
17 without which all others are meaningless.” *Jacobsen I*, ¶ 19. “It is perhaps the most
18 foundational of our Article II rights and stands, undeniably, as the pillar of our
19 participatory democracy.” *Id.* “If we are to have a true participatory democracy, we
20 must ensure that as many people as possible vote for the people who represent them.
21 ...” *Id.* (quoting Montana Constitutional Convention, Verbatim Transcript, Feb. 17,
22 1972, Vol. III, p. 402). The franchise right is afforded greater protection under the
23 Montana Constitution than under the U.S. Constitution. *Jacobsen II*, ¶ 17.
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1 23. Mont. Const., Art. IV, § 2 defines who enjoys this right: “Any citizen of the United
2 States 18 years of age or older who meets the registration and residence requirements
3 provided by law is a qualified elector unless he is serving a sentence for a felony in a
4 penal institution or is of unsound mind, as determined by a court.” *See also* Mont
5 Code. Ann. § 13-1-111.

6 24. Joshua Cypher is a patient at the state hospital.

7 25. Mr. Cypher is over the age of 18.

8 26. Mr. Cypher is a resident of the state of Montana and Deer Lodge County and has
9 been for more than thirty (30) days.

10 27. Mr. Cypher is a citizen of the United States.

11 28. Mr. Cypher is a patient at the Montana State Hospital in Warm Springs, MT currently
12 living in the “Delta Unit.”

13 29. On April 3, 2024, this Court sentenced Plaintiff for the crime of felony aggravated
14 assault in case number DC-22-93. Plaintiff was involuntarily committed to Montana
15 State Hospital under the custody of the Montana Department of Public Health and
16 Human Services.

17 30. On September 30, 2024, while at Montana State Hospital, Plaintiff filled out a
18 complete Montana Voter Registration Application (“Registration”) which was mailed
19 to the Deer Lodge County Election administrator by staff at Disability Rights
20 Montana later that day. *See* Montana Voter Registration Application, Ex. A.

21 31. The Registration listed Plaintiff’s last residential address prior to commitment as “506
22 Adams St. Anaconda Deer Lodge County, [MT] 59711.” Plaintiff is still an owner of
23 that residence.
24

1 32. Defendant confirmed receipt of the completed voter Registration but rejected the
2 registration in an email to Christa Gabriel of Disability Rights Montana stating,
3 amongst a list of other rejected registrations, “Joshua Cypher (DOC Commit – not
4 eligible).” *See* Email Toni Hofland to Christa Gabriel (Oct 2, 2024), Ex. B⁵.

5 33. On October 7, 2024, Mr. Cypher filed the initial complaint herein and motion for a
6 temporary restraining order (TRO) directing Defendant Hofland to register him to
7 vote, provided he otherwise met the requirements to register, regardless of whether he
8 is currently sentenced for a felony. The Court granted that TRO the same day.
9 Findings of Fact, Conclusions of Law, Temporary Restraining Order at Order Setting
10 Hearing at 13.

11 34. Thereafter, Defendant did register Mr. Cypher to vote and transmitted his ballot.

12 35. However, this did not adequately secure Mr. Cypher’s constitutional right to vote.

13 36. At present, and without permanent injunctive and declaratory relief from this Court,
14 Mr. Cypher’s right to vote in the November 5, 2024 and subsequent elections “may
15 be challenged at any time by any registered elector” on the grounds that Mr. Cypher
16 “is of unsound mind, as determined by a court” or “has been convicted of a felony
17 and is serving a sentence in a penal institution.” *See* Mont. Code Ann. § 13-13-
18 301(1).

19 37. Further, Mr. Cypher’s registration in this and subsequent elections is subject to
20 cancellation. *See* Mont. Code Ann. § 13-2-402 (requiring cancellation if the “(3) the
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24 ⁵ The names of other potential voters are redacted to protect their confidentiality as patients at MSH.

1 elector is of unsound mind as established by a court” or “(4) the incarceration of the
2 elector in a penal institution for a felony conviction is legally established.”).

3 38. At present, and without permanent injunctive and declaratory relief from this Court,
4 the voting rights of all involuntarily committed individuals at the Hospital who
5 otherwise meet the qualifications to vote—convicted felons or not—are likewise in
6 jeopardy.

7 39. Disability Rights Montana is legally required to protect these individuals from the
8 unlawful deprivation of their fundamental right to vote.

9 40. Based on Disability Rights Montana’s review, the Court’s TRO has not adequately
10 functioned to protect the voting rights of patients at the Hospital to date. Disability
11 Rights Montana is aware of another patient at the hospital whose right to vote has
12 been restricted, despite the election administrator’s receipt of a copy of the Court’s
13 TRO.⁶ And, Disability Rights Montana is aware of ongoing inconsistent application
14 of Mont. Const. Art. IV, § 2 and Mont. Code Ann. § 13-1-111 to Hospital patients
15 since issuance of the Court’s TRO.

16 41. Moreover, the issues presented in this case pose a continuing problem not only for
17 current patients at the Hospital, but for anyone who has ever been involuntarily
18 committed in Montana.

19
20 ⁶ Plaintiffs do not allege that any election administrator has violated the Court’s TRO. However, at least one
21 election administrator in a different county asserted that they will not register a constituent of Disability Rights
22 Montana who is a patient at the Hospital in the same circumstance as Mr. Cypher (a “guilty but mentally ill” felon).
23 Disability Rights Montana provided the election administrator and the county attorney with a copy of the Court’s
24 order. The county attorney consulted with the Secretary of States office, but they were unable to provide any
25 guidance, and has formally requested an attorney general opinion on the matter but has not yet received one. Thus,
the county attorney opined that individual should not be registered because, as a patient at MSH criminally
committed, the county attorney asserts, the patient “is in a penal institution.” To date, the individual has not been
registered. Plaintiffs respectfully disagree with the county attorney’s opinion but have submitted this matter to the
court precisely to obtain the court’s determination of the issues.

1 42. The current Montana voter registration application form requires potential voters to
2 make the following affirmation:

3 I affirm under penalty of perjury that the information on this application is true and
4 correct, and that *I am not serving a felony conviction in a penal institution nor have*
5 *been found to be of unsound mind by a court.* I understand that if I have given false
information on this application, I may be subject to a fine or imprisonment, or both,
under federal and/or state law.⁷

6 43. The form does not define what it means to “have been found to be of unsound mind
7 by a court,” place any time limitation on such a finding, or make any provision for the
8 possibility that the individual’s rights were, at some point, restored. The form also
9 does not define what a “penal institution” is.

10 44. If election administrators are permitted to assume, without contrary guidance from the
11 courts, that people involuntarily committed to the Hospital are categorically adjudged
12 of “unsound mind” individuals wishing to vote would be justifiably afraid to sign an
13 affirmation—under penalty of perjury—attesting that they have never been adjudged
14 of “unsound mind” if they have ever been involuntarily committed, even if that was
15 years ago. Likewise, if election administrators are already disenfranchising voters on
16 the assumption that the Hospital is a “penal institution,” individuals who are
17 criminally committed to the Hospital would be justifiable afraid to attest that they are
18 not “serving a felony conviction in a penal institution.” This lack of definitional
19 clarity chills the individuals’ fundamental right to vote.

20 45. Like many other patients Disability Rights Montana has tried to help register, Mr.
21 Cypher wants his vote to be counted, so he can exercise some measure of choice in
22

23 ⁷ Montana Secretary of State, Montana Voter Registration Application (emphasis added), *available at*
24 <https://votemt.gov/voter-registration/>

1 selecting the elected officials who control most aspects of his life as a patient at the
2 State Hospital. Issuance of the relief requested in this action is essential to preserving
3 and protecting these individuals' rights.

4 46. Disability Rights Montana wants every lawfully eligible voter to have the chance to
5 vote, regardless of their disability status or the fact that they are or were involuntarily
6 committed.

7 **COUNT I: VIOLATION OF MONT. CONST., ART. IV, § 2**
8 (Injunctive Relief)

9 47. Plaintiffs incorporate all other allegations of this Complaint.

10 48. Mr. Cypher presently meets all requirements to vote in Montana under Mont. Const.,
11 Art. IV, § 2 and Mont. Code Ann. § 13-1-111.

12 49. Mr. Cypher has never been “adjudicated to be of unsound mind.”

13 50. Mr. Cypher is not currently “serving a sentence for a felony in a penal institution.”

14 51. Mr. Cypher’s right to vote is and will remain in jeopardy unless the Court acts to
15 protect his rights.

16 52. Mr. Cypher therefore seeks a preliminary and permanent injunction directing the
17 Defendant to maintain his registration and allow him to vote for so long as he meets
18 the requirements to vote in Deer Lodge County under Mont. Const., Art. IV, § 2 and
19 Mont. Code Ann. § 13-1-111.

20 **COUNT II: DECLARATORY JUDGMENT**
21 (Mont. Code Ann. §§ 27-8-101, et seq.)

22 53. Plaintiffs incorporate all other allegations of this Complaint.

23 54. “Any person . . . whose rights, status, or other legal relations are affected by a statute,
24 municipal ordinance, contract, or franchise may have determined any question of
25

1 construction or validity arising under the instrument, statute, ordinance, contract, or
2 franchise and obtain a declaration of rights, status, or other legal relations
3 thereunder.” Mont. Code Ann. § 27-8-202.

4 55. As discussed above, Mr. Cypher’s right to vote and the voting rights of all
5 involuntarily committed individuals at the Hospital who otherwise meet the
6 qualifications to vote—convicted felons or not—are in jeopardy unless the Court
7 declares their rights as requested herein.

8 56. Mr. Cypher is entitled to a declaratory judgment to determine his voting rights.

9 57. Likewise Disability Rights Montana is entitled to a declaratory judgement to clarify
10 the rights of the constituents it is obligated to protect from unlawful voting rights
11 deprivations.

12 58. Plaintiffs therefore seek a declaratory judgment as detailed below.

13 **PRAYER FOR RELIEF**

14 Plaintiffs respectfully request that the Court:

- 15 1. Issue a preliminary and permanent injunction directing the Defendant to maintain
16 Joshua Cypher’s voter registration and allow him to vote for so long as he meets the
17 requirements to vote in Deer Lodge County under Mont. Const., Art. IV, § 2 and
18 Mont. Code Ann. § 13-1-111.
- 19 2. Issue its order declaring that:
 - 20 a. A person involuntarily committed by a Montana court, whether criminally or
21 civilly, is not “adjudicated of unsound mind” and retains their right to vote in
22 Montana provided the person meets the other requirements to vote in Montana

1 unless the individual has been specifically “adjudicated to be of unsound
2 mind” by a court of competent jurisdiction based on competent findings; and


3 b. For purposes of determining who is qualified to vote under Mont. Const., Art.
4 IV, § 2 and Mont. Code Ann. § 13-1-111, Montana State Hospital is not a
5 “penal institution” and therefore patients at Montana State Hospital who meet
6 the other requirements to vote in Montana are not barred from registering to
7 vote or voting on the ground that the individual is “serving a sentence for a
8 felony in a penal institution.”

9 3. Award Plaintiff’s attorney’s fees and costs as allowed by law; and

10 4. Grant such other and further relief as the Court deems just and proper.

11 DATED this 18th day of October, 2024.

12 DISABILITY RIGHTS MONTANA

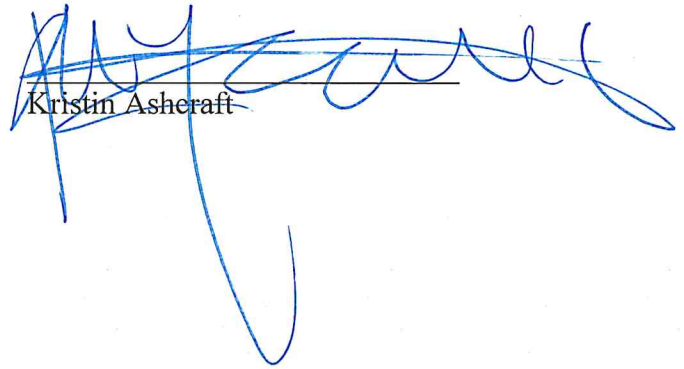
13
14 By: 
15 Tal M. Goldin,
16 *Attorney for Plaintiff*

CERTIFICATE OF SERVICE

The undersigned does hereby certify that on the 18th day of October, 2024, I mailed a true and correct copy of the foregoing, postage prepaid, first class, to the following:

Matt Enrooth, Esq.
Deer Lodge County Attorney's Office
800 Main Street
Anaconda, MT 59711

DISABILITY RIGHTS MONTANA



Kristin Ashcraft

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Montana Voter Registration Application

Please type or print clearly using black or blue ink. Fields marked with an asterisk (*) are required. If you do not provide all the required information, your application to register to vote will not be complete.

Check all that apply: New Registration Name Change Address Change Signature Update Other

SECTION 1: ELIGIBILITY REQUIREMENTS

Are you a citizen of the United States?* Yes No
Will you be at least 18 years of age on or before the next election?* Yes No
Will you be a Montana resident for at least 30 days before the next election?* Yes No

If you checked "No" in response to any of these questions, you do not meet the eligibility requirements to vote.

SECTION 2: APPLICANT AND IDENTIFICATION INFORMATION

Name*: Cypher Joshua David
Last Name* First Name* Middle Name/Initial Suffix

Date of Birth*: 70 Phone (Recommended): 693-7600 Email (Recommended): _____
Month Day Year

Select one of the following identification (ID) options and provide the required information*:

- I have a Montana driver's license # and it is: unknown
- I do not have a Montana driver's license. The last 4 digits of my Social Security Number (SSN) are:
- I do not have a Montana driver's license or a Social Security Number. I have presented an original or enclosed a copy of a current and valid photo ID (including but not limited to, Tribal ID, Military ID, or school district or post secondary education photo ID) that shows my name OR an alternative form of identification that shows my name and current address (e.g. paycheck stub; utility bill; bank statement; or government document).

506 Adams St Anaconda Deer Lodge 59711
Montana Residential Address* City County Zip Code
P.O. Box 100 Warm Springs MT 59756
Mailing Address (if different than residential) City State Zip Code

If Applicable:

- Military Domestic (or military spouse or dependent) — only if on active duty and will be absent from place of registration
- Military Overseas (or overseas military spouse or dependent)
- U.S. Citizen Overseas

SECTION 3: PREVIOUS REGISTRATION INFORMATION (Will be used to provide cancellation information to former jurisdiction) REQUIRED IF NAME CHANGED OR IF PREVIOUSLY REGISTERED TO VOTE IN ANOTHER MONTANA COUNTY OR IN ANOTHER STATE

Previous Registration Name: Joshua David Cypher

506 Adams St Anaconda MT 59711
Address of previous registration City State Zip Code

SECTION 4: ABSENTEE BALLOT INFORMATION

I request an absentee ballot to be mailed to me for ALL elections in which I am eligible to vote as long as I reside at the address listed on this application.

If your mailing address differs during certain times of the year, please add the seasonal mailing address information, or contact your county election office. Seasonal mailing address for the period of: _____ through _____
Month Day Year Month Day Year

Seasonal Mailing Address (if applicable) City State Zip Code

SECTION 5: AFFIRMATION

I affirm under penalty of perjury that the information on this application is true and correct, and that I am not serving a felony conviction in a penal institution nor have been found to be of unsound mind by a court. I understand that if I have given false information on this application, I may be subject to a fine or imprisonment, or both, under federal and/or state law.

Signature*: Joshua D. Cypher Date*: 9.30.24

THE AFFIRMATION ON THIS APPLICATION FOR VOTER REGISTRATION MUST BE SIGNED BY THE APPLICANT - FAILURE TO DO SO WILL PREVENT APPLICATION FROM BEING PROCESSED

From: Toni Hofland <thofland@adlc.us>
Sent: Wednesday, October 2, 2024 1:29 PM
To: Christa Gabriel <christag@disabilityrightsmt.org>
Subject: Warm Springs Registrants

Disability Rights Montana

Warning: Sender thofland@adlc.us has never sent any emails to your organization. Please be careful before replying or clicking on the URLs.

[Report Phishing Block as Spam Remove Banner](#)

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Hi Christa,

Following is the list of names that I returned registrations to:

[REDACTED]

Joshua Cypher (DOC Commit – not eligible)

[REDACTED]

Thanks,

Toni Hofland

ANACONDA-DEER LODGE COUNTY

Clerk & Recorder

Election Administrator

(406) 563-4063

Fax: (406) 563-4078

Documents are now available online at www.idocmarket.com!

*****Requests of Clerk & Recorder personnel for title, easement, mineral rights, or any other search of Anaconda-Deer Lodge County publications/documents which create any legal liability regarding accuracy, guarantees and finality are prohibited. County clerks are not lawyers or legal aides and cannot offer legal advice or verify research results. County clerks are responsible for recording documents not researching documents.***

CERTIFICATE OF SERVICE

I, Tal M. Goldin, hereby certify that I have served true and accurate copies of the foregoing Complaint - Amended Complaint to the following on 10-18-2024:

Matthew Calvin Enrooth (Govt Attorney)
800 Main Street
Anaconda MT 59711
Representing: Toni Hofland
Service Method: eService

Electronically Signed By: Tal M. Goldin
Dated: 10-18-2024