

IN THE SUPREME COURT OF MISSISSIPPI

TASHA DILLON

APPELLANT

VS.

NO.2015-CA-01677

DAVID MYERS

APPELLEE

**On Appeal From the Circuit Court
of Pike County, Mississippi
Cause Number 15-172-PCT
Honorable James D. Bell**

Brief of Appellant Tasha Dillon

Oral Argument Requested

ANTHONY R. SIMON (MS BAR 10009)
PIETER TEEUWISSEN (MS BAR 8777)
SIMON & TEEUWISSEN, PLLC
621 EAST NORTHSIDE DRIVE
JACKSON, MISSISSIPPI 39206
PHONE: 601-366-8400
COUNSEL FOR APPELLANT

CERTIFICATE OF INTERESTED PERSONS

The undersigned counsel of record certifies that the following listed persons have an interest in the outcome of this case. These representations are made in order that the Justices of Supreme Court and/or the Judges of the Court of Appeals may evaluate possible disqualification or recusal:

Tasha Dillon
Appellant

Pieter Teeuwissen, Esq.
Anthony R. Simon, Esq.
Counsel for Appellant

David Myers
Appellee

Board of Election Commissioners of Pike County, and
Pike County Circuit Clerk Roger Graves
Intervenors

Charles Wayne Dowdy, Esq.
Counsel for Intervenors

Hon. James D. Bell, Special Judge

Respectfully Submitted,

Tasha Dillon, Appellant

By: /s/Pieter Teeuwissen
PIETER TEEUWISSEN, MSB # 8777
Attorney of Record for Tasha Dillon

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STATEMENT OF THE ISSUES

The issues that this Court should resolve on appeal are:

- I. MISS. CODE ANN. §23-15-927 establishes judicial review of primary election disputes where a party executive committee fails to act. The incumbent sought resolution in the Legislature, who subsequently declined to review a primary election contest. Therefore, the trial court's procedural dismissal without holding an evidentiary hearing was erroneous.

- II. MISS. CODE ANN. §23-15-927 establishes the role of election commissioners during the proceedings of a special tribunal. Intervention as parties by the Election Commission and Circuit Clerk is contrary to statutory responsibilities. Therefore, the trial court erred by allowing intervention.

STATEMENT OF ASSIGNMENT

The Supreme Court should retain jurisdiction of this appeal. This appeal involves resolving ambiguity as to whether the proper forum for reviewing a primary election challenge for a seat in the Mississippi House of Representatives is the Judiciary or the Legislature. Resolving this issue involves reconciling Art. 4, § 38 of the Mississippi Constitution of 1890 with MISS. CODE ANN. § 23-15-927 (Supp. 2014). This determination is a fundamental and urgent issue of broad public importance requiring ultimate determination by the Supreme Court.

For these same reasons, Appellant Dillon requests oral argument.

STATEMENT OF THE CASE

During the August 4, 2015 Democratic Primary for the Mississippi House of Representatives (House) District 98, a number of irregularities occurred. These irregularities involved counting ballots, how the ballots (particularly absentee and affidavit ballots) were handled and processed by the Pike County Election Commission (PCEC), both during the open polling hours and after the election. R. at 7-12. Moreover, Dillon, her representatives, and other voters personally observed voter intimidation and misconduct during and after the election on the part of Myers' campaign. R. at 8. The PCEC, on behalf of the Mississippi Democratic Executive Committee (MDEC), certified Myers as the winner of the primary by a vote of 2003 to 1859 (144 votes or 3.7%). R. at 3. Based on various irregularities and observations, as well as the circuit clerk prohibiting a complete statutorily-provided examination of the balloting materials by Dillon and her representatives, Dillon timely served a contest petition on the chair and members of the MDEC on August 24, 2015. *See* MISS. CODE ANN. § 23-15-921.

Dillon served her contest petition on the Mississippi Democratic Executive Committee, including its Chairman and Secretary, on August 24, 2015 and served an Amendment to the Petition on September 1, 2015. R. at 17-24; R. at 28-30. Notwithstanding the filing of Dillon's petition and amendment, no hearing occurred nor did the Mississippi Democratic Executive Committee attempt to set a hearing. Under MISS. CODE ANN. § 23-15-921, a political party is required to notify "all parties concerned" at least five days before proceeding to investigate and consider the grounds upon which the election is contested. MISS. CODE ANN. § 23-15-927, however, requires

filing a petition for judicial review “within ten (10) days after any contest or complaint has been filed with an executive committee.” Because Dillon’s ten-day period for seeking judicial review was set to expire before the Mississippi Democratic Executive Committee might act, Dillon timely filed a Petition to obtain expedited relief in the Pike County Circuit Court. To date, the MDEC has *never* taken any action.

After filing the petition with the trial court and serving Myers, but before Myers filed any responsive pleading, the Pike County Board of Election Commissions and Circuit Clerk (election officials) filed an application for intervention of right (R. at 33), to which Dillon filed a response (R. at 37). Thereafter, Myers filed his Affirmative Defenses and Answer (R. at 49), and his Motion to Dismiss (R. at 56). Over Dillon’s objection, the trial court granted intervention. Finally, by agreement of the parties, all other motions and matters were heard by the trial court on October 1, 2015.

At the hearing, the Pike County Circuit Court dismissed the action finding that the circuit court did not have jurisdiction because the Mississippi House of Representatives had exclusive jurisdiction of this matter. R. at 72-73. In granting the motion to dismiss, the trial judge acknowledged “that there are conflicting cases” involving election matters and determined that this matter should be brought before the House of Representatives. T. at 20-23. Because the circuit court acknowledged that the case law was in conflict and declined to hold a hearing on the merits, Petitioner Dillon timely perfected her appeal from the Pike County Circuit Court to this Court. R. at 75-76. Dillon likewise filed a challenge with the Mississippi House of Representatives as it was unclear which forum, circuit court or the House, was proper.

The general election was held November 3, 2015. With respect to House District 98, only Representative Myers’ name appeared on the ballot, as there was not

a Republican challenger. Dillon's challenge was, therefore, timely filed with the House because it was filed with the Clerk of the Mississippi House of Representatives within 30 days of the general election. See Special Committee Resolution, Paragraph 3.

Upon calling this matter for hearing, a special committee of the House, Honorable Mark Baker, Chair, recommended returning this matter to the judiciary because it involves a primary challenge. Defendant Myers, *pro se*, argued that the House should resolve this matter. The House subsequently decided, over Myers' objection, that pursuant to House Rule 104B, it did not have authority to hear this matter. Special Committee Resolution, Paragraph 5. Stated differently, the House Committee reached the conclusion offered by Petitioner Dillon in opposition to Myers' motion to dismiss: a circuit court is the proper forum for a hearing on the merits of a ***primary*** challenge for a House seat.

Notwithstanding Dillon's timely and diligent efforts, neither the party, the circuit court nor the Legislature has taken jurisdiction and addressed the merits of Dillon's challenge.

SUMMARY OF THE ARGUMENT

Tasha Dillon has consistently and timely challenged the August 4, 2015 Democratic Primary results for House District 98, yet never received a hearing on the merits. The Mississippi Democratic Executive Committee never acted; the Pike County Court dismissed this matter; and, the Mississippi House of Representatives, pursuant to internal rule, declined to hold a hearing on the merits because this contest involves a primary election contest as opposed to a general election contest.

MISS. CODE ANN. §23-15-927 establishes judicial review of primary election disputes. The trial court erred in dismissing Dillon's petition without a hearing on the merits. The trial court accepted Myers' argument that resolution of this contest should occur in the House, not a court. Dillon argued that because this was a primary election, circuit court was the proper review forum. The House subsequently took the same position as Dillon. Hence, while the trial court's deference to the House is understandable, it was ultimately erroneous.

The trial court also erred by allowing the Pike County election commissioners and circuit clerk to intervene. MISS. CODE ANN. §23-51-931, Proceedings of Special Tribunal, specifies that the election commissioners of a county **shall** sit with the judge as advisors or assistants in the trial with respect to counts, calculations and inspections. Likewise, the circuit clerk **shall** issue subpoenas. It is axiomatic that if officials have ministerial, statutory duties to assist the process, they cannot also participate in the process as parties.

ARGUMENT

For the benefit of the counsel and those of you in the audience, I'm going to say that there are conflicting cases on election cases, and in some respects that's understandable for a number of reasons. First of all, it's a complex set of laws, and, secondly, election cases are typically heard quickly on emergency basis...

--Hon. James D. Bell (T. pp. 20-21)

- I. MISS. CODE ANN. §23-15-927 establishes judicial review of primary election disputes where a party executive committee fails to act. The incumbent sought resolution in the Legislature, who subsequently declined to review a primary election contest. Therefore, the trial court's procedural dismissal without holding an evidentiary hearing was erroneous.**

A. Standard of Review

The standard of review in an election contest is de novo for all questions of law. *McDaniel v. Cochran*, 158 So.3d 992, ¶ 3 (Miss. 2014). *Thompson v. Jones*, 17 So.3d 524, 525 (Miss. 2008)(internal citations omitted). Where an erroneous interpretation or application of law occurs, reversal is warranted. *Boyd v. Tishomingo County Executive Committee*, 912 So.2d 124, 128 (Miss. 2008)(internal citations omitted). Likewise, “[J]urisdictional questions are subject to de novo review.” *Jackson v. Bell*, 123 So.3d 437 (Miss. 2013)(internal citation omitted).

A different standard, manifest error, applies to a judge's findings of fact; as the trial court heard only procedural motions and did not conduct an evidentiary hearing, this standard is inapplicable to the case at bar.

In sum, the court cannot be blind to a direct violation of the Election Code. *Thompson v. Jones*, 17 So.3d 524, 527 (Miss. 2008)(speaking to judicial review of ballot irregularities).

B. The trial court should have conducted an evidentiary hearing.

The issue on appeal is exceptionally narrow: should the trial court have exercised jurisdiction and conducted an evidentiary hearing on the merits? The answer, both under existing Mississippi law and pursuant to a subsequent decision by the House, is: yes. While the trial court's deference to the House is understandable, even laudable, Myers' request for deference and the trial court's conclusion that it did not have jurisdiction judge was ultimately incorrect. The result is that Dillon has not received meaningful due process and an opportunity to be heard on the merits, despite timely filing a challenge before the party, the court and the legislature.

When a person desiring to contest the election of another returned as a party nominee in a legislative district composed of more than one county or parts of more than one county, that person is to file a petition reciting the grounds upon which the election is contested with the Chairperson of the respective State Executive Committee. MISS. CODE ANN. § 23-15-923. Dillon did this. R. at 17. When an executive committee fails to act, however, a court has jurisdiction to hear the Petition pursuant to authority conferred by MISS. CODE ANN. § 9-7-81 and by MISS. CODE ANN. § 23-15-927, which state:

When and after any contest has been filed with the executive committee, ... and the executive committee having jurisdiction fails to promptly meet or, having met, fails or unreasonably delays to fully act upon the contest or complaint or fails to give with reasonable promptness the full relief required by the facts and the law, the contestant shall have the right forthwith to file in the circuit court of the county in which the irregularities are charged to have occurred . . . a sworn copy of his protest

or complaint, together with a sworn petition, setting forth with particularity how the executive committee has wrongfully failed to act or to fully and promptly investigate or has wrongfully denied the relief prayed by the contest, with a prayer for a judicial review thereof. A petition for judicial review must be filed within ten (10) days after any contest or complaint has been filed with an executive committee. . . . In no event shall a prayer for relief be filed in any court other than the appropriate circuit court as authorized in this section.

In addition to §23-15-927 conferring jurisdiction, venue was proper in the Pike County circuit court, under MISS. CODE ANN. §§11-11-3, 11-41-3, and 23-15-927, as the irregularities detailed herein occurred in Pike County, and the defendant (Myers) resides or can be found in Pike County, Mississippi. Upon filing of the petition in circuit court and posting bond, the Chief Justice of the Supreme Court shall forthwith designate and notify a [judge] of a district other than that which embraces the county or any of the counties involved in the contest...to proceed to the county in which the contest has been filed... MISS. CODE ANN. §23-15-929. These statutory requirements occurred, and the contest moved quickly to an agreed hearing date. R. at 31-32; T. at 2.

On the hearing date, the Pike County Circuit Court, upon a motion of incumbent/respondent Myers, subsequently dismissed the action finding that the circuit court lacked subject matter jurisdiction and that the Mississippi House of Representatives had exclusive jurisdiction of this matter. R. at 72. In granting the motion to dismiss, the trial judge acknowledged “that there are conflicting cases...”and concluded that Dillon should lodge her challenge with the House of Representatives. T. at 20-23. Because the circuit court acknowledged that the case law was in conflict and declined to hold a hearing on the merits, Petitioner Dillon timely perfected her appeal from the Pike County Circuit Court to this Court. R. at 75.

Dillon likewise brought this matter before the Mississippi House of Representatives as it was unclear which forum, circuit court or the House, was proper. The general election was held November 3, 2015. With respect to House District 98, only Representative Myers' name appeared on the ballot, as there was not a Republican challenger. Dillon thereafter timely filed her challenge with the Clerk of the Mississippi House of Representatives within 30 days of the general election. See Special Committee Resolution, Paragraph 3.

Upon calling this matter for hearing, a special committee of the House, Honorable Mark Baker, Chair, recommended returning this matter to the judiciary because it involves a primary challenge. Incumbent Myers, *pro se*, argued to his colleagues that the House should decide this matter. The House subsequently decided, over Myers' objection, that pursuant to House Rule 104B, it only exercises authority over "[a]nyone desiring to contest the election, ***other than a primary election...***" (emphasis in original). See Special Committee Resolution, Paragraph 5. Stated differently, the House Committee reached the conclusion offered by challenger Dillon in opposition to Myers' motion to dismiss: circuit court is the proper forum for a hearing on the merits of a ***primary*** challenge for a House seat. *Barbour v. Gunn*, 890 So.2d 843 (Miss. 2004).

In the matter before the Court, the learned trial judge was tasked with reconciling 3 4, § 38 of the Mississippi Constitution with the statutory scheme governing election challenges. Article 4, § 38 states "[E]ach house shall elect its own officers, and shall judge of the qualifications, return and election of its own members." This section is not the end of the inquiry; rather, it is the beginning. The Legislature

(House) has taken two distinct actions to cede some of its constitutional authority to the judiciary. First, the Legislature passed various statutes commonly referred to as the Election Code. Second, the House promulgated rules which govern its interpretation and application of Article 4, § 38. The combination of the statutes and internal rules lead to only one logical conclusion: the House reserves its power to decide general election contests “of its own members”, but defers primary election contests to the judiciary.

Fortunately, while precedent is limited, it does exist. “Section 23-15-927 vests the circuit court with subject-matter jurisdiction following the filing of an election contest with the Executive Committee, ‘in which the irregularities are charged to have occurred,’ where the committee ‘having jurisdiction fails to promptly meet or, having met, fails or unreasonably delays to fully act upon the contest or complaint...’”. *Glenn v. Powell*, 149 So.3d 480-485 (Miss. 2014). It is undisputed that Dillon timely filed a petition with the state executive committee, and further undisputed that the committee failed to act. Thus, upon Dillon’s timely filing of a petition with the Pike County Circuit Clerk, Section 23-15-927 established judicial review. ***Id.***

“MISS. CODE ANN. §23-15-593 controls the contesting of primary elections.” *Barbour v. Gunn*, 890 So.2d 843, 847 (Miss. 2004). The *Barbour* case involved a challenge to the certified winner of the August, 2003 Republican Primary for House District 56. The State Republican Executive Committee (SREC), unlike the Democratic Executive Committee in this matter, actually met and set a hearing date on Gunn’s challenge. The hearing, however, was outside the statutory timeframe, and “therefore Gunn seized the reins of his complaint and steered it directly to the circuit court...a completely permissible procedure. It is clear from the face of MISS. CODE ANN. §23-15-

927 that a trial court has jurisdiction in these rare circumstances.” *Id.* at 847. In this case, the Mississippi Democratic Election Committee made no attempt to address Dillon’s petition, and thus, in the face of a statutory deadline, she filed her election contest in circuit court¹.

Once in circuit court, Dillon’s opponent sought a venue he perceived as more favorable: the House. This is understandable as he was the incumbent and his then legal counsel was also a member of the House. What is troublesome, however, is that as the special trial judge wrestled with the jurisdictional quandary of court versus legislature, neither House member provided the learned trial judge with the substance of House Rule 104B. Rule 104B, as referenced in the House Special Committee Resolution pertaining to this contest, clearly states that the House will only consider circumstances involving “[a]nyone desiring to contest the election, ***other than a primary...***” (emphasis original in the Resolution). This begs the question: did these two members of the House not know their rules?

“Nothing about the judicial-review process of the election code mandated by the Legislature conflicts with [a court’s] separate-mandated, constitutional powers.” *Jackson v. Bell*, 123 So.2d at 440. In fact, House Rule 104B reconciles the Legislative powers granted by the Mississippi Constitution with the election code statutes passed by the Legislature. The House reserves unto itself the power to decide general election matters which involve the “election of its own members” pursuant to Article 4, § 38. Simultaneously, the House avoids becoming a full-time judicial body by empowering the judiciary, both through statute and rule, to address primary challenges. In taking

¹ MISS. CODE ANN. §23-15-927. This section was amended in 2012 to insert the ten days language; prior to the 2012 revision, the filing time language was “forwith”. *Cook v. Brown*, 909 So.2d 1075, 1079 (Miss. 2005).

this approach, the House establishes a bright line that ensures Article 3, § 24 of the Mississippi Constitution has meaning: “[A]ll courts shall be open; and every person for an injury done...shall have remedy by due course of law...”. Dillon has diligently sought review of the August, 2015 primary and is statutorily entitled to a merits review by the circuit court. The procedural decision to dismiss was contrary to established precedent.

II. MISS. CODE ANN. §23-15-927 establishes the role of election commissioners during the proceedings of a special tribunal. Intervention as parties by the Election Commission and Circuit Clerk is contrary to statutory responsibilities. Therefore, the trial court erred by allowing intervention.

An election contest is between candidates seeking office. When a challenge occurs, it may involve any manner of irregular conduct. For example, the challenger may raise questions regarding an opponent’s qualifications or election day activities. Other times, the challenger may raise issues regarding voter registration, counting and/or disqualification of ballots, or veracity of affidavit/absentee ballots. Depending on the particulars of a challenge, the reviewing court may be called upon to decide any of a myriad of issues.

The proceedings of a special tribunal examining an election contest are controlled by MISS. CODE ANN. §23-25-931. This section states, in pertinent part, that the circuit clerk “shall” summons each of the five election commissioners of the county who, in turn, “shall sit with the judge as advisors or assistants” and are charged with various duties. The statutory role of election officials is recognized in several Mississippi cases: *Jackson v. Bell*, 123 So.2d 436, 440 (“The hearing is actually a ‘special tribunal’ which consists of the judge and five election commissioners who sit

with the judge ‘as advisors or assistants in the trial and determination of the facts.’”); *Jefferson Davis County Democratic Executive Committee v. Davies*, 912 So.2d 837, 841 (Miss. 2005)(“After making his findings, Judge Johnson polled the Jefferson Davis County Election Commissioners, who pursuant to §23-15-931, had been serving as advisors to the judge during the proceeding.); *Pegram v. Basley*, 708 So.2d 1307 (Miss. 1997)(At the judicial review trial of the decision handed by the DEC, all give members of the Tunica County Election Commission sat with the trial judge in an advisory capacity to assist in the trial and determination of facts according to MISS. CODE ANN. §23-15-931). The role of election commissioners, as established by statute and affirmed by case law, is that of advisor—not a party. This is true even though the special judge is the “controlling judge” of both the facts and the law. *Id.* at 1312. Likewise, the circuit clerk is required to issue subpoenas and secure the ballot boxes.

Under controlling statutes and case law, intervention by election officials into an election contest is improper. Dillon has **not** sued the election officials, and their intervention only clouds the true issue: which candidate received the greater number of lawfully cast votes? Importantly, the election officials, in seeking intervention, cited no authority in support of their request. T. at 33-35. The motion did not cite any statute, rule or case which purportedly gives the election officials “intervention by right”. Without legal support, the election officials are not a proper party and, instead, should return to their statutory roles as referenced in case law precedent: issuing subpoenas and serving as advisors.

CONCLUSION

Dillon has sought, and continues to pursue, her right to a merits review of the August 2015 Democratic Primary vote for House District 98. Dillon respectfully submits that the trial court erred when it dismissed her timely filed contest without an evidentiary hearing. While the trial court's deference to the Legislature was understandable, the House, desires to review general election results only, and the Legislature has established a statutory scheme for judicial review.

Accordingly, Dillon asks this Court for the following specific relief:

1. Vacate the trial court's order granting the motion to dismiss and return this matter to the Pike County Circuit Court for a hearing on the merits;
2. Reverse the trial court's decision allowing various election officials to intervene; and,
3. Direct the trial court to take other action consistent with this Court's decision and necessary to ensure an expedited hearing on the merits pursuant to statute and case law.

RESPECTFULLY SUBMITTED, this the 13th day of May, 2016.

Tasha Dillon, Appellant

By: /s/Pieter Teeuwissen
PIETER TEEUWISSEN, MSB # 8777
Attorney of Record for Tasha Dillon

CERTIFICATE OF SERVICE

The undersigned certifies that he has this day electronically filed the foregoing document with the Clerk of the Court using the Court's electronic filing system (ECF), which sent notification of such filing to all attorneys of record.

The undersigned further certifies that he has this day caused to be mailed by United States Mail, postage pre-paid, a true and correct copy of the above and foregoing document to the following:

Hon. James D. Bell, Special Judge
Special Judge
318 South State Street
Jackson, Mississippi 39201-4417

Honorable Roger A. Graves
Pike County Circuit Clerk
Post Office Box 31
Magnolia, Mississippi 39652

Respectfully submitted this the 13th day of May, 2016.

/s/Pieter Teeuwissen
PIETER TEEUWISSEN, MSB # 8777
Attorney of Record for Tasha Dillon