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13 *Attorneys for Plaintiffs*

14
15 IN THE SUPERIOR COURT FOR THE STATE OF ARIZONA
16 BY AND FOR THE COUNTY OF MARICOPA

17 PUENTE, an Arizona nonprofit corporation;
MIJENTE SUPPORT COMMITTEE, an
18 Arizona nonprofit corporation; JAMIL
NASER; a resident of the State of Arizona;
19 JAMAAR WILLIAMS, a resident of the
State of Arizona; and JACINTA
20 GONZALEZ, a resident of the State of
Arizona,

21 Plaintiffs,

22 v.

23 ARIZONA STATE LEGISLATURE, a
political subdivision of the State of Arizona,

24 Defendant.

Case No.

**COMPLAINT FOR
DECLARATORY AND
INJUNCTIVE RELIEF**

1 For their complaint against Defendants the State of Arizona and the Arizona State
2 Legislature, Plaintiffs Puente, Mijente Support Committee, Jamil Naser, Jamaar Williams,
3 and Jacinta Gonzalez hereby alleged as follows:

4 INTRODUCTION

5 1. This is a case that strikes at the heart of Arizona’s Open Meeting Law and the
6 principles of transparency and democratic accountability it is designed to protect.
7 Specifically, the case concerns the extent to which our elected lawmakers may lawfully
8 engage in secretive, closed-door legislative planning sessions aimed at producing
9 legislation that will impact all Arizonans, and thereby subvert the long-established right of
10 the public to observe the legislative process and understand what interests are influencing
11 it.

12 2. On December 4, 5, and 6, 2019, the American Legislative Exchange Council
13 (“ALEC”) will be hosting an event in Scottsdale, Arizona that it calls the States & Nation
14 Policy Summit (hereafter “the Summit”). ALEC, which defines itself as a “voluntary
15 membership organization of state legislators,”¹ planned the Summit to occur in Arizona
16 with the intentional participation of members of at least five Arizona State Legislative
17 committees – specifically, (1) the Arizona State Senate’s Natural Resources & Energy
18 Committee and (2) Senate Water & Agriculture Committee; (3) the Arizona State House of
19 Representatives’ Appropriations Committee, (4) House Federal Relations Committee, and
20 (5) House Health & Human Services Committee (collectively, the “Legislative
21 Committees”).

22 3. The Summit, which will also draw state legislators and private participants
23 from across the country, will convene, in part, to formulate “model bills” that will be
24 introduced in Arizona and nationwide. Since it is the first stage of policy formulations,
25 Arizona law generally requires creation of these “model bills” to be conducted in sessions

26 ¹ See *About ALEC*, ALEC.ORG, <https://www.alec.org/about/> (last visited Dec. 3, 2019).

1 open to the public. Yet, these deliberations will be undertaken behind closed-doors and
2 with the influence of unknown and democratically unaccountable interests who will
presumably never be disclosed to the Arizona electorate.

3 4. Upon information belief, quora of each of the five Legislative Committees
4 will be attending the Summit and deliberating in these closed-door meetings – meaning that,
5 as a practical matter, each of these five Legislative Committees will have the ability to
6 firmly commit to introduce them in one or both houses of the Arizona State Legislature and
7 ultimately advance these bills through the legislative process— but without public
8 understanding of the ultimate origins of and influence upon the legislation. This secretive
9 process is not conducive to public understanding or basic political accountability.

10 5. The anticipated participation by five Legislative Committees will violate
11 Arizona’s Open Meeting Law, A.R.S. §§ 38-431 *et seq.*, which long ago established the
12 intent of Arizonans to have an open and transparent government. Specifically, the Open
13 Meeting Law requires that “[a]ll meetings of any public body shall be public meetings and
14 all persons so desiring shall be permitted to attend and listen to the deliberations and
15 proceedings,” and that “[a]ll legal action of public bodies shall occur during a public
16 meeting.” A.R.S. § 38–431.01.

17 6. The proposed closed-door meetings, during which a quorum of five
18 legislative committees will be secretly deliberating matters of public policy, violates
19 Arizona’s Open Meeting Law on its face. Accordingly, as residents of Arizona and
20 members of the Arizona public, the Plaintiffs file this Action seeking a Declaratory
21 Judgment that ALEC’s Summit constitutes a violation of Arizona’s Open Meeting Laws,
22 entitling Plaintiffs to appropriate relief.

JURISDICTION AND VENUE

1 7. This Court has jurisdiction over this matter pursuant to A.R.S. § 12-123, 12-
2 1831 *et seq.*, and 38-431.07, and Rules 1 and 4 of the Arizona Rules of Procedure for Special
3 Actions.

4 8. Venue is proper in Maricopa County pursuant to A.R.S. §§ 12-401 and 38-
5 431.07, and Rule 4(b) of the Arizona Rules of Procedure for Special Actions.

PARTIES

8 9. Plaintiff Puente (“Puente”) is an Arizona nonprofit corporation duly
9 registered with the Arizona Corporation Commission. As a grassroots migrant justice
10 organization based in Phoenix, Arizona, Puente develops, educates, and empowers migrant
11 communities to protect and defend immigrant families. Puente has been instrumental in
12 protecting immigrant communities in the wake of SB 1070, 49th Leg., 2d Sess. (Ariz. 2010),
13 an anti-immigrant law that that was passed in 2010 and profoundly impacted the lives of
14 thousands of Arizonans. SB 1070 was also reportedly drafted at an ALEC conference in
15 December 2009 by a participating Arizona state senator.

16 10. Plaintiff Mijente Support Committee is an Arizona nonprofit corporation duly
17 registered with the Arizona Corporation Commission. Mijente Support Committee is a
18 digital and grassroots hub for Latinx and Chicanx organizing and movement building and
19 has an interest in commenting on and organizing against legislation that negatively impacts
20 immigrant communities.

21 11. Plaintiff Jamil Naser is a resident of Arizona and is a lead organizer with the
22 Arizona Palestine Solidarity Alliance (“APSA”), an anti-militarization coalition working to
23 build a regional movement opposing the ongoing U.S./Israel partnership which props up
24 the brutal occupation of the Palestinian people and their lands. APSA is pro-Boycott,
25
26

1 Divestment & Sanctions (BDS), a movement that seeks to mobilize international economic
2 and political pressure on Israel and its various humanitarian crises.

3 12. Plaintiff Jacinta Gonzalez is a resident of the State of Arizona who resides in
4 Maricopa County. Ms. Gonzalez has been organizing against the policies and legislation
5 that leads to the criminalization of immigrants for over a decade.

6 13. Plaintiff Jamaar Williams is a resident of the State of Arizona who resides in
7 Maricopa County. Mr. Williams has engaged in extensive advocacy in the local Phoenix
8 chapter of the Black Lives Matter organization, through which he has helped to create safe
9 spaces for Black people in the greater Phoenix metropolitan area and participates in policy
10 discussions that address the misallocation of government resources and the lack of police
11 accountability in Phoenix and Tempe.

12 14. Each Plaintiff is “affected by an alleged violation” of A. R. S. § 38–431 within
13 the meaning of A. R. S. § 38–431.07.

14 15. Defendant Arizona State Legislature is the juridical entity that is to be named
15 for violations of Arizona’s Open Meeting Law committed by its State Legislative
16 Committees, including but not limited to the Natural Resources & Energy Committee and
17 Water & Agriculture Committee of the Arizona State Senate, and the Appropriations,
18 Federal Relations, and Health & Human Services Committees of the Arizona State House
19 of Representatives (collectively, the “Legislative Committees”).²

20 16. The Legislative Committees are “public bodies” as defined in the Open
21 Meeting Law, A.R.S. § 38–431.

22 17. Plaintiffs, each and all of them, are “affected by an alleged violation” of the
23 Open Meeting Law, A.R.S. § 38–431 within the meaning of A.R.S. § 38–431.07.

24 _____
25 ² The standing of the Arizona State Legislature to sue and be sued was recognized and
26 affirmed by the United States Supreme Court in *Ariz. State Legislature v. Ariz. Indep. Redistricting Comm’n*, 135 S. Ct. 2652, 192 L. Ed. 704 (2015).

GENERAL ALLEGATIONS

Statutory Framework

1
2 18. Arizona’s Open Meeting Law is codified at A.R.S. §§ 38–431, *et seq.*
3 (hereinafter, the “Open Meeting Law”).

4 19. Pursuant to the Open Meeting Law, “[a]ll meetings of any public body shall
5 be public meetings and all persons so desiring shall be permitted to attend and listen to the
6 deliberations and proceedings.” A. R. S. § 38-431.01(1).

7 20. The Open Meeting Law specifically applies to “public bodies,” which are
8 defined as “the legislature, all boards and commissions of this state or political subdivisions,
9 all multimember governing bodies of departments, agencies, institutions and
10 instrumentalities of this state or political subdivisions, including without limitation all
11 corporations and other instrumentalities whose boards of directors are appointed or elected
12 by this state or a political subdivision.” A.R.S. § 38-431(6).

13 21. The Open Meeting Law further expands the definition of “public bodies” to
14 include “all quasi-judicial bodies and all standing, special or advisory committees or
15 subcommittees of, or appointed by, the public body. Public body includes all commissions
16 and other public entities established by the Arizona Constitution or by way of ballot
17 initiative” A.R.S. § 38-431(6).

18 22. A “meeting,” for purposes of the Open Meeting Law, is defined as “the
19 gathering, in person or through technological devices, of a quorum of the members of a
20 public body at which they discuss, propose or take legal action, including any deliberations
21 by a quorum with respect to that action.” A.R.S. § 38-431(4).

22 23. “Legal action” is defined as “a collective decision, commitment or promise
23 made by a public body pursuant to the constitution, the public body’s charter, bylaws or
24 specified scope of appointment and the law of [Arizona].” A.R.S. § 38-431(3).

1 24. The Arizona State Legislature specifically designed the Open Meeting Law
2 to be expansive in its coverage. Accordingly, the Open Meeting Law defines “public body”
3 to include the broadest range of governmental organizations created under Arizona law to
4 include the Arizona Legislature, and its subcommittees.³ A.R.S. § 38-431.

5 25. Arizona’s Open Meeting Law is intended to open state government business
6 to public scrutiny and to prevent public bodies from making decisions in secret. The law
7 applies to “all discussions, deliberations, considerations or consultations among a majority
8 of the members of a governing body regarding matters that may foreseeably require final
9 action or a final decision of the governing body.”⁴

10 26. Any citizen of Arizona is permitted “to witness all governmental
11 policymaking activities, including any discussions leading to formal decisions made by the
12 public body.”⁵

13 27. The public may only be excluded from meetings of public bodies when they
14 gather for “executive sessions,” which can only be convened for one or more of seven
15 purposes delineated in the Open Meeting Law. A.R.S. §§ 38-431(2), -431.03(A).

16 28. Per the Open Meeting Law, “executive sessions” are only permissible where
17 public bodies are in:

18 [1] Discussion or consideration of employment, assignment,
19 appointment, promotion, demotion, dismissal, salaries,
20 disciplining or resignation of a public officer, appointee or
21 employee of any public body, except that, with the exception of
22 salary discussions, an officer, appointee or employee may
23 demand that the discussion or consideration occur at a public
24 meeting. The public body shall provide the officer, appointee or
25 employee with written notice of the executive session as is
26 appropriate but not less than twenty-four hours for the officer,
appointee or employee to determine whether the discussion or
consideration should occur at a public meeting; [2] Discussion

³ Ariz. Op. Att’y Gen. No. I83-128, 1983 WL 42773 at *1 (Nov. 17, 1983).

⁴ Ariz. Op. Att’y Gen. No. I78-285, 1978 WL 18920 at *3 (Dec. 21, 1978).

⁵ Ariz. Op. Att’y Gen. No. I83-128, 1983 WL 42773 at *1.

1 or consideration of records exempt by law from public
2 inspection, including the receipt and discussion of information
3 or testimony that is specifically required to be maintained as
4 confidential by state or federal law; [3] Discussion or
5 consultation for legal advice with the attorney or attorneys of
6 the public body; [4] Discussion or consultation with the
7 attorneys of the public body in order to consider its position and
8 instruct its attorneys regarding the public body's position
9 regarding contracts that are the subject of negotiations, in
10 pending or contemplated litigation or in settlement discussions
11 conducted in order to avoid or resolve litigation; [5]
12 Discussions or consultations with designated representatives of
13 the public body in order to consider its position and instruct its
14 representatives regarding negotiations with employee
15 organizations regarding the salaries, salary schedules or
16 compensation paid in the form of fringe benefits of employees
17 of the public body; [6] Discussion, consultation or
18 consideration for international and interstate negotiations or for
19 negotiations by a city or town, or its designated representatives,
20 with members of a tribal council, or its designated
21 representatives, of an Indian reservation located within or
22 adjacent to the city or town; and [7] Discussions or
23 consultations with designated representatives of the public body
24 in order to consider its position and instruct its representatives
25 regarding negotiations for the purchase, sale or lease of real
26 property.

A.R.S. § 38-431.03(A)(1-7).

29. The Arizona Court of Appeals recognized that plaintiffs may not have all the “specific facts” needed to prove an open meetings violation when a public body is meeting “in secret” because it is “a circular impossibility.”⁶ As a result, when a plaintiff alleges “facts from which a reasonable inference may be drawn supporting an Open Meeting Law violation, the burden shifts to the defendant to prove that an affirmative defense or exemption should permit a closed-door executive session.”⁷

⁶ *Fisher v. Maricopa Cnty. Stadium Dist.*, 912 P.2d 1345, 1351 (App. 1995).

⁷ *Id.*

History of ALEC's Influence on Legislative Processes

1 30. ALEC is a 501(c)(3) non-profit organization founded in 1973 in Chicago
2 that unites corporate lobbyists and federal, state, and local elected officials to deliberate,
3 draft and vote on “model bills” that are introduced in state legislatures across the country.

4 31. Since 2010, ALEC’s “model bills” have been introduced nearly 2,900 times,
5 in all fifty states and the U.S. Congress, with more than 600 of these model bills ultimately
6 becoming law.

7 32. ALEC’s membership, sponsors, and convening agendas are intentionally
8 hidden from the public. ALEC alleges that nearly a quarter of the nation’s state legislatures
9 are involved in the organization, in addition to 20 percent of Congress, eight sitting
10 governors, and more than 300 local elected officials.

11 33. State ALEC chairs are required to sign “loyalty oaths” to ALEC proclaiming,
12 “I will act with care and loyalty and put the interests of the organization first.”⁸

13 34. “Model bills” are drafted and introduced during ALEC convenings. State
14 legislators from around the country and private corporations participate in closed meetings
15 out of which emerge model bills. These “model bills” are ratified by legislators and private
16 interest representatives and are then introduced in state legislatures around the country, and
17 frequently ratified into law.

ALEC's Influence on Arizona Lawmaking

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19
20 35. ALEC’s impacts in Arizona have been widespread and disastrous for the
21 people of the State of Arizona and, in particular, the Plaintiffs and the individuals for whose
22 interests they advocate.

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25 ⁸ See Leo W. Gerard, *ALEC Demands Lawmakers Pledge Allegiance – to ALEC*,
26 HUFFINGTON POST (Dec. 9, 2013), https://www.huffpost.com/entry/alec-demands-lawmakers-pl_b_4408926.

1 36. While ALEC does not publish a list of its legislative members, at least twenty-
2 six members of the Arizona State Senate and House of Representatives are affiliated with
3 and have attended previous ALEC meetings, including its 46th annual meeting in Austin,
4 Texas in August 2019.

5 37. Arizona legislators who attended the August 2019 ALEC meeting in Texas
6 include:

7 a) From the Arizona House: John Allen, Nancy Barto, Leo Biasiucci, Shawwna
8 Bolick, Noel Campbell, Gina Cobb, Tim Dunn, John Fillmore, Mark
9 Finchem, Gail Griffin, John Kavanagh, Anthony Kern, Jay Lawrence, Becky
10 Nutt, Tony Rivero, Bret Roberts, T.J. Shope, Bob Thorpe, Ben Toma, Kelly
11 Townsend, Jeff Weninger.

12 b) From the Arizona Senate: Karen Fann, Sylvia Allen, David Gowan, Sine
13 Kerr, and Michelle Ugenti-Rita.

14 38. The aforementioned twenty-six Arizona Senators and House members
15 comprise quorums of each of the five Legislative Committees as follows:

16 a) Four of the seven members of the Senate Natural Resources & Energy
17 Senatorial Committee are: Sylvia Allen (member), David Gowan (member),
18 Sine Kerr (Vice-Chair), and Frank Pratt (Chair).

19 b) Four of the seven members of the Senate Water & Agriculture Committee
20 are: Sylvia Allen (member), David Gowan (member), Sine Kerr (Vice-Chair),
21 and Frank Pratt (Chair).

22 c) Six of the eleven members of the House Appropriations Committee are: Ben
23 Toma (member), Bret Roberts (member), Anthony Kern (member), John
24 Fillmore (member), John Kavanagh (Vice-Chair), and Regina Cobb (Chair).

1 d) Four of the seven members of the House Federal Relations Committee are:
2 Shawwna Bolick (member), Kelly Townsend (member), Gail Griffin (Vice-
3 Chair), and Mark Finchem (Chair).

4 e) Five of the nine members of the House Health and Human Services
5 Committee are: John Allen (member), Gail Griffin (member), Becky A.
6 Nutt (member), Jay Lawrence (Vice-Chair), and Nancy Barto (Chair).

7 39. In anticipation of the meeting in Austin, Texas, Representative John Allen,
8 ALEC's public sector chair in Arizona, "urged his colleagues in the State House and Senate
9 to book flights and hotel rooms, telling them that they wouldn't have to foot the bill
10 themselves."⁹ Rep. Allen made these statements to other legislators in an email he sent from
11 his House email account.¹⁰

12 40. Several of ALEC's "model bills" have passed — *verbatim* — in Arizona's
13 state legislature. Arizona's HB 2577, 47th Leg., 2d Sess. (Ariz. 2006) and HB 2751, 48th
14 Leg., 1st Sess. (Ariz. 2007) share language with both SB 1070 and ALEC's model anti-
15 sanctuary legislation, that would preempt duly enacted municipal laws providing sanctuary
16 from immigration enforcement policies those constituencies disagree with.

17 41. SB 1070, a law passed in 2010 which seeks to place restrictions on
18 immigration in the state, was initially drafted by Arizona State Senator Russell Pearce, a
19 member of ALEC, during an ALEC Taskforce meeting in December 2009.¹¹

20 42. At the ALEC Taskforce meeting, Senator Pearce drafted SB 1070 alongside
21 officials from the Corrections Corporation of America, a for-profit company that owns and

22 ⁹ See Elizabeth Whitman, *Arizona Republicans Flocked to Austin This Week for ALEC's*
23 *Annual Conference*, PHOENIX NEW TIMES (Aug. 16, 2019),
<https://www.phoenixnewtimes.com/news/arizona-gop-lawmakers-alec-conference-austin-republicans-koch-11343739>.

24 ¹⁰ *Id.*

25 ¹¹ See Laura Sullivan, *Prison Economics Help Drive Ariz. Immigration Law*, NPR, (Oct.
26 28, 2010), <https://www.npr.org/2010/10/28/130833741/prison-economics-help-drive-ariz-immigration-law>.

1 manages private prisons and immigrations detention centers nationally. Consistent with
2 ALEC’s closed-door policy, members of the public were not present during this initial
3 drafting process.¹²

4 43. When it was first introduced in 2010, SB 1070 immediately garnered the
5 support of 36 cosponsors, two-thirds of whom had either attended the December 2009
6 ALEC meeting where SB 1070 was drafted or were also ALEC members.

7 44. After SB 1070 was passed, Puente recognized that the bill was harmful to
8 immigrant communities and urged the Governor and local coalitions to prevent its
9 implementation. Puente Arizona identified the bill as a “steady march toward anti-
10 immigration attrition.” The bill, as described by Puente leadership, “built ways to humiliate
11 and dehumanize us through Sheriff Arpaio’s outdoor jails...and expanding penal colonies.”
12 Members of the community were forced to give birth in shackles, and lived in a constant
13 state of fear.¹³

14 45. ALEC also played an integral role in the passage of Arizona’s HB 2617, 52d
15 Leg., 2d Sess. (Ariz. 2016), a 2016 bill aiming to prevent companies from engaging in
16 Boycott, Divestment and Sanctions (“BDS”) against the state of Israel to end human rights
17 violations.¹⁴

18 46. In 2018, the American Civil Liberties Union filed a federal lawsuit on behalf
19 of Mikkel Jordahl successfully arguing than Arizona’s HB 2617, 52d Leg., 2d Sess. (Ariz.
20 2016) violates the First Amendment.¹⁵

21 ¹² See Seth Freed Wessier, *NPR Investigation: Private Prison Companies Helped Write SB*
22 *1070*, COLORLINES (Oct. 28, 2010), <https://www.colorlines.com/articles/npr-investigation-private-prison-companies-helped-write-sb-1070>.

23 ¹³ See Carlos Garcia, *Politico: Arizona, Arpaio, and SB1070 Spur Crusade for Immigrant*
24 *Rights*, PUENTE AZ (June 20, 2012), <http://puenteaz.org/blog/politico-arizona-arpaio-and-sb1070-spur-crusade-for-immigrant-rights/>.

25 ¹⁴ See Essley Whyte, *One way to silence Israel boycotts? Get lawmakers to pass anti-BDS*
26 *bills*, USA TODAY (May 1, 2019), <https://www.usatoday.com/story/news/investigations/2019/05/01/statehouse-model-bills-bds-protest-bans/3575083002/>.

¹⁵ See *Jordahl v. Brnovich*, 336 F. Supp. 3d 1016 (D. Ariz. 2018), *appeal filed*, No. 18-

1 47. Arizona’s HB 2617 is nearly identical to the bills drafted at ALEC meetings
and passed elsewhere in Illinois, South Carolina, and Rhode Island.¹⁶

2 48. In the wake of the criminalization of BDS laws, APSA and Mr. Naser faced
3 significant backlash, and Mr. Naser has been a victim of smears and attacks across Arizona.
4

5 **The Arizona ALEC Summit**

6 49. Based on the conduct of past convenings, and general ALEC practice, all of
7 the aforementioned twenty-six Arizona State Senators and House Members, who comprise
8 quora of each of the five Legislative Committees, will attend the Summit in Scottsdale,
9 Arizona December 4-6, 2019.

10 50. Upon information and belief, the Summit is not open to the general public and
11 there are no minutes or records of the proceedings made available to the general public.

12 51. Upon information and belief, these twenty-six Arizona legislators will
13 convene at the Summit to discuss, propose, and deliberate on number of “model bills” that
14 will impact public policy and likely be introduced in the Arizona State legislature, and as
15 such constitute “legal action” as defined in A.R.S. § 38-431.

16 52. Because model legislation from prior ALEC meetings resulted in laws like
17 HB 2617 and SB 1070, it is reasonably foreseeable that the Arizona state legislators
18 attending the ALEC Summit will engage in substantive deliberations and legal action that
19 are subject to the transparency requirements of Arizona’s Open Meeting Law.

20 53. The meetings will violate the basic principles of transparency and
21 accountability that the Open Meeting Law was enacted to protect.

22 54. Moreover, Plaintiffs and other members of the Arizona public are precluded
23 from presenting their views and interests in a critical stage of the legislative process, address
24

25 16896 (9th Cir. Oct. 3, 2018).
26 ¹⁶ *Id.*

1 policy implications, or otherwise engage in a robust discussion also necessary to the
2 democratic process, and specifically protected by Arizona’s Open Meeting Law.

3 55. Lack of oversight and transparency has previously led to the promulgation of
4 harmful laws and practices drafted and deliberated in secret. Without public oversight,
5 Government entities will be susceptible to shadowy dealings and will operate with
6 immunity from public scrutiny as prohibited by Arizona’s Open Meeting Laws.

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10 **FIRST CAUSE OF ACTION**

11 **Declaratory and Injunctive Relief for Violation of Arizona’s Open Meeting Law**

12 56. Plaintiffs incorporate by reference the allegations in the paragraphs above as
13 though fully set forth herein.

14 57. The gathering of the aforementioned Legislative Committees at the Summit
15 constitutes meetings of five (5) public bodies – namely the five Legislative Committees –
16 under Arizona’s Open Meeting Law, A.R.S. §§ 38-431(4),(6).

17 58. The meetings will be closed and not open to the general public.

18 59. The meetings will not be for one or more of the seven purposes set out in
19 Arizona’s Open Meeting Law governing executive sessions, which are the only meetings
20 of public bodies from which the general public may be excluded, pursuant to A.R.S. §§ 38-
21 431.03(A)(1)-(7).

22 60. Rather, the aforementioned Legislative Committees are gathering at the
23 ALEC Summit to discuss, propose or take legal action, including drafting and agreeing
24 upon legislation that may be introduced in the Arizona State Legislature.

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D. Enjoining a quora of the Legislative Committees from attending any future Summit of ALEC or similarly situated organizations, without complying with Arizona’s Open Meeting Law;

E. Awarding Plaintiffs their costs and expenses, including their reasonable attorneys’ fees, under A.R.S. § 38-431.07; and

F. Awarding such further and additional relief as is just and proper.

DATED this 4th day of December, 2019.

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By: _____
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