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October 30, 2013

Ms. Kelly Williams  
Lake Havasu City Clerk  
2330 McCulloch Blvd., N.  
Lake Havasu City, AZ 86403

RE: Applications for Initiative Serial Numbers Submitted by  
Help Dr. Bill Stop The Sewer Fiasco and Help Dr. Bill With The \$5 Million

Dear Ms. Williams:

Your letter of October 23<sup>rd</sup> directed to Dr. Ullery has been referred to my office. I do not see any specific criticism of the applications.

The reasoning in the letter is not specific enough to put someone on notice of what to challenge in regard to your reasoning. You simply say the application is “considered to be legally invalid”, but provide no reasoning.

For example, you might have some criticism of the form or format, or might have a criticism of the substance or wording, or might be of the opinion that same is not subject to initiative. However, simply saying “legally invalid” is insufficient.

It would be very inefficient for my client to have to file a lawsuit just to smoke out what the problem allegedly is. Obviously this matter will go to litigation, but at least my client should have a right to know what we are litigating about.

Essentially, the last time there was a similar proposal there were specific legal opinions which critiqued the wording of that particular proposal. In this case there is nothing whatsoever pointing out what would be “legally invalid.”

Therefore please consider this letter formal demand to proceed with the applications or provide specific reasons why they are regarded as deficient.

In the event that neither is forthcoming on or before Tuesday, November 5, 2013 my office will deem these demands refused and will therefore feel free to institute legal action that may be appropriate.

Yours very truly,

HARVEY R. JACKSON

HRJ/htp

cc: Lake Havasu City Attorney  
Dr. Ullery