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**IN THE FIRST JUDICIAL DISTRICT COURT,  
LARAMIE COUNTY, STATE OF WYOMING**

**AMERICAN TRANSPERANCY, d/b/a  
openthebooks.com, EQUALITY STATE  
TAXPAYERS ASSOCIATION, and  
STATE OF WYOMING through  
relators AMERICAN  
TRANSPARENCY, d/b/a  
openthebooks.com and EQUALITY  
STATE TAXPAYERS ASSOCIATION,**

**Plaintiffs,**

**vs.**

**CYNTHIA I. CLOUD, in her capacity  
as Wyoming State Auditor,**

**Defendant.**

**FILED**

**JUL 18 2018**

**DIANE SANCHEZ  
CLERK OF THE DISTRICT COURT**

**Case No. 190-153  
JURY TRIAL DEMANDED**

**COMPLAINT**

COME NOW Plaintiffs American Transparency d/b/a openthebooks.com and the Equality State Taxpayers Association, and the State of Wyoming through Relators American Transparency d/b/a openthebooks.com and Equality State Taxpayers Association, and for their action against Defendant Cynthia I. Cloud, Wyoming State Auditor, state as follows:

## **I. JURISDICTION AND VENUE**

1. This action is brought pursuant to the Wyoming Public Records Act, Wyo. Stat. § 16-4-201 *et. seq.* and Wyo. Stat. §1-30-101 *et seq.* for a writ of mandamus. Access to public records has been denied by the Defendant, and, pursuant to Wyo. Stat. § 16-4-203, jurisdiction and venue resides in this Court for an action to obtain public records. Jurisdiction is found in this Court under Wyo. Stat. §1-30-102 for the issuance of a writ of mandamus as the Defendant Cynthia I. Cloud has refused to perform non-discretionary, ministerial acts required of her by statute (the Public Records Act).

## **II. THE PARTIES**

2. Plaintiff American Transparency is a non-profit national organization dedicated to government transparency and accountability operating as “openthebooks.com.” It is the largest private data base of government spending in the world comprised of over four billion lines of government expenditures. Its honorary chairman is former U.S. Senator Dr. Tom Coburn. Plaintiff American Transparency made requests under the Wyoming Public Records Act that are the subject of this Complaint. The Defendant has failed to comply with the records requests. Plaintiff American Transparency is one of the relators in this action for a writ of mandamus brought in the name of the State of Wyoming.

3. Plaintiff Equality State Taxpayers Association is a non-profit association of Wyoming taxpayers dedicated to protecting Wyoming taxpayers and working to ensure openness and accountability in government. Plaintiff Equality State Taxpayers Association has joined in the requests made by Plaintiff American Transparency and the Defendant has failed to comply with the records requests of Plaintiff Equality State Taxpayers Association. Plaintiff Equality State Taxpayers Association is also a relator in this case for a writ of mandamus brought in the name of the State of Wyoming.

4. Both of the Plaintiffs have a right to the records sought by this Complaint and each has been denied those records by the Defendant.

5. This suit is brought against Defendant Cynthia I. Cloud in her official capacity as Wyoming State Auditor. She is the official custodian of the vendor transactional data (the State checkbook) that the Plaintiffs have requested under the Wyoming Public Records Act and the official having the duty to fulfill the Plaintiffs' Public Records Act requests. The Defendant's duty in fulfilling the Public Records Act requests is non-discretionary and ministerial and she has refused to perform her duties in this regard. Given her inattention to this duty, the Plaintiffs allege that the Defendant has abandoned the duties of her office in making records available to the public concerning the operations of state government.

### III. FACTUAL BACKGROUND

#### *Official Public Records*

6. The information that the Plaintiffs seek are defined by Wyoming statute as the highest order of public records to which the public has a right to obtain. The records sought by the Plaintiffs are defined by the Wyoming Statutes as “Official Public Records” for which there is a duty to maintain for access by the public. Wyo. Stat. § 16-4-201(a)(vi)(A) provides that,

“Official public records” includes all original vouchers, receipts and other documents necessary to isolate and provide the validity of every transaction relating to the receipt, use and disposition of all public property and public income from all sources whatsoever; all agreements and contracts to which the state or any agency or subdivision thereof if a party . . . all records or document required by law to be filed with or kept by any agency or the State of Wyoming;

7. By law, the State Auditor (the Defendant) is required to maintain and produce the requested data and routinely provides this data to state agencies.

#### *Auditor Cloud’s Initial Positions and Denials of Public Records*

8. American Transparency has been making public records requests of the Wyoming State Auditor’s Office since the summer of 2015. In 2015, the response to American Transparency was that the request would impair the ability of the office to discharge its duties. This argument was repeated annually until 2018.

9. Specifically, on August 25, 2015, Plaintiff American Transparency made a request under the Wyoming Public Records Act for vendor transactional data.

Plaintiff American Transparency informed the Defendant that it seeks the data to study Wyoming's level of fiscal responsibility and to give information to Wyoming citizens and citizens across America comparing fiscal responsibility among the states and compared to the federal government. Reports of fiscal responsibility and transparency have been given by Plaintiff American Transparency on such news outlets as the Wall Street Journal, USA Today, Good Morning America, ABC World News Tonight, CNN, FOX News, and Forbes Magazine. The Chief Executive Officer of American Transparency, Adam Andrzejewski, has given speeches at the January 18, 2018 Wyoming Press Association Annual Conference and the Governor's Business Forum (keynote speech for the "Dynamics of Change" Hall of Fame Dinner) relating to governmental transparency.

10. On September 2, 2015, the Defendant's office denied the request on the basis that the request was too burdensome. In follow-up communications with the Defendant's office, the Defendant's office made clear that it would not entertain any suggestions on how to efficiently obtain the data in a manner that would not constitute a burden to the Defendant's staff.

11. So began a four-year effort to obtain data. On August 16, 2016, Plaintiff American Transparency again requested the vendor transactional data under the Wyoming Public Records Act. On September 9, 2016, Defendant Cloud's office again denied the request as too burdensome.

12. On June 25, 2017, Plaintiff American Transparency again requested the vendor transactional data under the Wyoming Public Records Act. Defendant Cloud's office again denied the request. By letter dated June 30, 2017, the Defendant denied the request as too burdensome.

13. With each denial, Defendant Cloud's office has simply made blanket, unsupported assertions that complying with the request would "impair the agency's ability to discharge its duties," despite never exploring any means of fulfilling the request and despite routinely providing such data to other state agencies. For example, at one point, the Attorney General and the Auditor wrongly argued that providing state public employee salaries was an "undue burden." The Human Resources Division of the Department of Administration and Information had already produced 10,000 state employee salaries in less than two weeks without fees.

14. In a March 27, 2018 letter, the Defendant revealed that the data requested was stored from January 2013 to date in cache on a website controlled and operated by the Auditor. The data is uploaded to the website <http://sao.wyo.gov/vendor-payments> and it is available to be searched and displayed for a period of between two and three months and then the data is moved to cache on the website, no longer accessible to users of the website but available to the Auditor's Office. In 2017, American Transparency had asked for the website data and had been told that the data was "purged" when it was removed from public view. Suddenly, the data that

had been requested multiple times by American Transparency and later by Equality State Taxpayers Association was now a download away and had not been “purged.”

15. The Defendant also objected to the production of vendor data because the identity of vendors or their addresses could not be revealed. However, the identity of vendors and their addresses is a matter of public record and the Public Records Act nowhere provides for confidential treatment or non-disclosure of vendor information.

### ***The Defendant’s Reversal of Position***

16. On January 23, 2018, after consultation with the Auditor’s Office and counsel for the Auditor, Plaintiff Equality State Taxpayers Association submitted a request under the Wyoming Public Records Act for the transactional data that had been requested by Plaintiff American Transparency. By separate correspondence dated February 18, 2018, Plaintiff American Transparency renewed its prior requests under the Wyoming Public Records Act and provided clarification of its request for the transactional data that it had requested since 2015. By letter dated February 20, 2018, Plaintiff Equality State Taxpayers Association joined in the renewed and clarified request.

17. In a reversal of position, by letter dated January 30, 2018, the Defendant conceded that the data could be provided. The Defendant now confessed that the data could be provided without “impairing the duties of [her] office.” The

Defendant's office stated that it would provide a cost estimate for the amount that the Defendant would charge for the public records.

18. By letter dated March 27, 2018, the Defendant provided a cost estimate for complying with the requests of \$7,820.

19. On or about April 30, 2018, the Defendant received full payment from the Plaintiffs of the costs charged by the Defendant to fulfill the Public Records Act requests.

20. From April 30, 2018 to July 16, 2108, the Defendant dedicated a total of only approximately nine hours of professional staff time and nearly 28 hours of clerical time on fulfilling the Public Records Act requests: 37 hours total. During this period, the Defendant produced approximately four months and three weeks of the five-year data request while she previously estimated eighteen hours to produce one year of the data. Stated differently, for the time spent, the Defendant charged for two years of data but provided only four months and three weeks of data. Beyond this, taken together, by the admission of her office, the Defendant dedicated less than five days of work of one equivalent employee to fulfilling the requests out of the 77 days since the Defendant received payment for fulfilling the requests.

21. The Defendant claims that fulfilling the requests has been made more burdensome because of Medicaid payments to beneficiaries. The Defendant claims that, even though the vendor transactional data has been previously published on its

website in each instance for as long as three months, it must now charge the Plaintiffs and take time to go back through previously published data to ensure that the Defendant has not breached confidentiality. The Defendant either (i) previously breached her statutory duties by disclosing statutorily protected information; or (ii) sought to charge the Plaintiffs for a review that has already been done, in which case the Defendant Cloud fraudulently charged the Plaintiffs for a review that was previously performed. The Defendant represented that the time required to produce these records would be eighteen hours for each year requested. The reason that this data would take eighteen hours of review, the Defendant said, was purportedly that there needed to be a check for potential confidential transactions. American Transparency and Equality State Taxpayers Association questioned the need to perform confidentiality checks of the data given that the data was publicly displayed for up to 90 days and presumably had been previously checked for confidentiality. The Auditor replied on April 30, 2018 that the Plaintiffs would be charged for the confidentiality check and that every line would be so checked for a total cost of \$3,600.

22. In an editorial published in the Wyoming Tribune Eagle dated July 2, 2018 entitled "Wyomingites deserve transparency about state government spending," the Auditor contradicted herself on the need for a universal line-by-line review by limiting the application of that review to Medicaid and Victim Assistance

programs managed by Department of Health and the Attorney General's Office respectively. As such, even taking the Defendant's statement that some transactions must be reviewed, she has now admitted that the vast majority of the data need not be inspected. Despite admitting that the vast majority of data need not be inspected, the Defendant has still not acted to fulfill the vast majority of the data request. Previous fulfilled requests of the Auditor's Office have shown that transactional specific data is normally extracted and then reviewed using a Microsoft Excel spreadsheet. In this instance, a simple sort of the data by agency would be able to produce all the data from the other 84 agencies, supported boards and independent boards for production and result in a simpler process to perform the unnecessary confidentiality check. Plaintiffs maintains that the Auditor is charging the public for production of records that have been displayed on the website. Her failure to prevent disclosure of confidential data in previous operations should not be an opportunity to charge citizens for reviews that should have already been done as part of the Auditor's normal function. The Defendant alleged in her June 22, 2018 letter that there may be other confidential data, but clearly the use of a filter for agencies that do not have confidential transactions such as the Governor's Office or even the Auditor's office would be prudent to prevent needless inflation of the cost of a Public Records Act request.

23. In the denials of requested data in 2015, 2016 and 2017, the Defendant's office stated that the number of electronic records per year was 1.8 million, yet in the March 27, 2018 letter, the number of transactions was suddenly lowered to only a million per year. As such, a discrepancy exists in the reports of the amount of data in the Defendant's possession. This wide discrepancy calls into question the integrity of the Defendant's treatment of the records requests.

24. Auditor Cloud has publicly suggested that the problem is related to the legislature failing to fund transparency. She has suggested that more money is needed to accomplish the job. But the Auditor obtained funding for a \$63.9 million contract with software vendor CGI to manage Wyoming state government accounting.

25. In other interviews, although the Public Records Act contains no requirement to justify the requests and the Defendant has no statutory right to question the need for the data, the Defendant has disputed the need for the data by suggesting that the requests are being made to get information for the upcoming elections. Yet Plaintiff American Transparency has been requesting this information for four years. Like Plaintiff American Transparency, Plaintiff Equality State Taxpayers Association is dedicated to lower government wasteful and unnecessary spending and equitable taxation in Wyoming, an issue that dominated the last two

legislative sessions. Both non-profits seek transparency to meet their stated goals as non-profit organizations seeking accountability.

26. In the 77 days after the Defendant received payment for the collection of the data through July 16, 2018, the Defendant produced only four months and three weeks of the requested five years of the data. The Defendant has failed to produce any part of the vendors list. It is taking the Defendant more time to produce a copy of the transaction than it took the Defendant to process an invoice, create the electronic transaction, attest to the transaction's validity, and issue the payment. Quite obviously, this is an absurdity.

27. The Plaintiffs has asked the Defendant to work to fulfill the request and has asked for a date certain by which the data will be provided but the Defendant has refused both requests.

**COUNT I**  
**ENFORCEMENT OF THE WYOMING**  
**PUBLIC RECORDS ACT**  
**(Wyo. Stat. 16-4-201 *et seq.*)**

28. The Plaintiffs re-allege and re-state Paragraphs 1-27 as though fully restated.

29. The Plaintiffs have made requests and are entitled to the official public records they have requested as defined by Wyo. Stat. §16-4-201. The Plaintiffs have paid all fees required of them to receive such records. There exists no dispute as to

what records are to be provided pursuant to the Plaintiffs' Public Records Act request.

30. The Defendant has failed or refused to provide the public records in accordance with the Wyoming Public Records Act.

WHEREFORE, the Plaintiffs ask that the Court declare that the Defendant is in violation of the Wyoming Public Records Act and enter an order setting a date by which all responsive records must be produced as enforced by the contempt powers of the Court.

**COUNT II**  
**REQUEST FOR DECLARATION OF WILLFUL**  
**VIOLATIONS OF WYOMING PUBLIC RECORDS ACT**

31. The Plaintiffs re-allege and re-state Paragraphs 1-30 as though fully restated.

32. Defendant Cynthia I. Cloud's treatment of the Plaintiffs' Public Records Act requests demonstrates a knowing and willful violation of the Wyoming Public Records Act.

33. Specifically, for three years, the Defendant refused to provide the requested records on the basis that the requests could not be fulfilled without impairing the ability of her office to function. She then reversed positions, admitting that the records requests could be fulfilled without impairing the ability of her office to function, giving a limited number of hours required to fulfill the request.

34. Having conceded that she could fulfill the request, the Defendant has invented a new way of avoiding her statutory duties arising under the Wyoming Public Records Act. The Defendant has created delay and pretexts to delay in providing the records contrary to the requirements and intent of the Public Records Act. The Defendant has made public statements disputing the necessity of the records and has relegated the requests to the status of perpetual administrative delay, having the effect of denying the Plaintiffs their rights under the Public Records Act by non-action.

35. The Defendant purports to charge for work that presumably has already been done—i.e., reviewing the records for confidentiality requirements. Charging for work that was previously done violates the terms of the Public Records Act.

WHEREFORE, pursuant to Wyo. Stat. §16-4-205, the Plaintiffs ask that the Court enter findings that the Defendant Cynthia I. Cloud has knowingly, intentionally, and willfully violated the terms of the Wyoming Public Records Act and make a referral to the Wyoming Attorney General for imposition of the statutory penalty in the amount of \$750 per day of the continuing violation. Plaintiffs request that they be awarded their attorney fees as damages for the costs associated with bringing this suit.

**COUNT III**  
**REQUEST FOR WRIT OF MANDAMUS**

36. The Plaintiffs re-allege and re-state Paragraphs 1-35 as though fully restated.

37. At common law, and by statute, the function of mandamus is to command performance of a ministerial duty by a public official that is plainly defined and required by law.

38. Under the Wyoming Public Records Act, the Defendant has a non-discretionary and ministerial duty to produce the “official public records” requested by the Plaintiffs. Defendant Cynthia I. Cloud has refused to perform her non-discretionary, ministerial duty under the Wyoming Public Records Act.

39. Pursuant to Wyo. Stat. §1-30-103, the Plaintiffs ask the Court to compel the Defendant to immediately produce the official public records requested by the Plaintiffs. This request is brought in the name of the State of Wyoming, on the relation of the Plaintiffs, and is verified by affidavits (*See Exhibits “A” and “B”*). No adequate remedy at law exists for the Plaintiffs as the only relief available to the Plaintiffs is to obtain the requested records.

40. Pursuant to Wyo. Stat. §1-30-106, the Plaintiffs request that the Court issue a peremptory writ ordering the Defendant to produce the records immediately upon service, or, alternatively, to issue a show cause order to the Defendant to

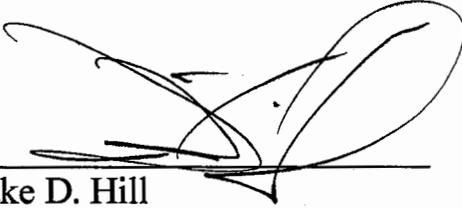
immediately appear before the Court to demonstrate why she should not be required to do the act immediately, and that this relief be entered upon the docket of the Court.

41. Pursuant to Wyo. Stat. §1-30-112, the Plaintiffs request that they be awarded damages for all expenses and costs resulting from the Defendant's refusal to perform her duties, including attorney fees as a measure of damages. The Plaintiffs also request that the Court impose the statutorily prescribed fine on the Defendant, as set forth in Wyo. Stat. §1-30-115 for the refusal to perform statutory duties.

WHEREFORE, in the name of the State of Wyoming in relation to the Plaintiffs, the Plaintiffs ask that a writ of mandamus issue to command the immediate production of the public records the Plaintiffs have requested and that the Plaintiffs be awarded damages under Wyo. Stat. §1-30-112 for all expenses they have incurred (including the expenses incurred for legal counsel) resulting from the Defendant's conduct and that the Court enter impose the statutorily prescribed fine on the Defendant under Wyo. Stat. §1-30-115 for her refusal to perform her statutory duties.

DATED this 18th day of July, 2018.

[Signature Line Found On Next Page]



By: \_\_\_\_\_  
Drake D. Hill  
Hill Law Firm, LLC  
2616 Carey Avenue  
Cheyenne, Wyoming 82001  
(307) 638-9334 (office)

# Exhibit A

IN THE FIRST JUDICIAL DISTRICT COURT,  
LARAMIE COUNTY, STATE OF WYOMING

AMERICAN TRANSPERANCY, d/b/a  
openthebooks.com, EQUALITY STATE  
TAXPAYERS ASSOCIATION, and  
STATE OF WYOMING THROUGH  
RELATORS AMERICAN  
TRANSPARENCY, d/b/a  
openthebooks.com and EQUALITY  
STATE TAXPAYERS ASSOCIATION,

Plaintiffs,

vs.

Case No. 190-153

CYNTHIA I. CLOUD, in her capacity  
as Wyoming State Auditor,

Defendant.

AFFIDAVIT OF ADAM ANDRZEJEWSKI

COUNTY OF DU PAGE        )  
  ) SS  
STATE OF ILLINOIS        )

I, Adam Andrzejewski, upon being sworn to tell the truth, depose and state as follows:

1. My name is Adam Andrzejewski. I am the Chief Executive Officer of American Transparency d/b/a openthebooks.com (hereinafter "American Transparency"). I am over the age of twenty-one years, have never been convicted

1 

of a crime, am fully competent to give this Affidavit, and am knowledgeable of the facts stated in this Affidavit.

2. American Transparency has sought to obtain records from the Wyoming State Auditor through records requests submitted under the Wyoming Public Records Act. I have reviewed the facts alleged in the complaint and affirm that those facts are true and accurate to the best of my knowledge and belief based upon personal knowledge or a review of pertinent records and correspondence between the parties. I make no representations on legal authority or legal argument contained in the Complaint.

3. Plaintiff American Transparency is a non-profit, non-partisan national organization dedicated to government transparency and accountability. We operate as "openthebooks.com." We've captured 4 billion public-sector expenditures and have built one of the world's largest repositories of government spending. Our Honorary Chairman is former U.S. Senator Dr. Tom Coburn. Plaintiff American Transparency made requests under the Wyoming Public Records Act that are the subject of this Complaint. The Defendant has failed to comply with the records requests. Plaintiff American Transparency is one of the relators in this action for a writ of mandamus brought in the name of the State of Wyoming.

5. In 2018, the Defendant reversed her prior position that she would not produce the requested public records that American Transparency had requested

since 2015. The Defendant provided a cost estimate of \$7,820 for complying with the records requests. On or about April 30, 2018, we arranged for delivery of full payment for the costs to be charged by the Defendant to fulfill the Public Records Act requests.

6. From April 30, 2018 to July 16, 2018, the Defendant has provided approximately only four months and three weeks of the State's checkbook of a request for five years of data. The Defendant has failed to produce any part of the vendor list that we have requested. The Defendant has not provided any commitment as to when the remaining records will be provided and efforts to urge timely compliance with the Public Records Act have been unsuccessful. The instant lawsuit has become necessary to enforce the Plaintiffs' rights under the Wyoming Public Records Act and to compel the Defendant to meet her statutory duties.

7. No action for damages can provide a remedy for the Defendant's failure to fulfill her statutory duties as the nature of the case is to obtain records that will be used to inform citizens across Wyoming and across American on the workings of Wyoming government.

FURTHER AFFIANT SAYETH NOT.

  
ADAM ANDRZEJEWSKI

SUBSCRIBED AND SWORN to before me on this 18 day of July, 2018.



*Laura Polanco*  
Notary Public in and for  
the County of Du Page,  
State of Illinois

My Commission Expires:

12/20/20

# **Exhibit B**

IN THE FIRST JUDICIAL DISTRICT COURT,  
LARAMIE COUNTY, STATE OF WYOMING

AMERICAN TRANSPERANCY, d/b/a  
openthebooks.com, EQUALITY STATE  
TAXPAYERS ASSOCIATION, and  
STATE OF WYOMING THROUGH  
RELATORS AMERICAN  
TRANSPARENCY, d/b/a  
openthebooks.com and EQUALITY  
STATE TAXPAYERS ASSOCIATION,

Plaintiffs,

vs.

Case No. 190-153

CYNTHIA I. CLOUD, in her capacity  
as Wyoming State Auditor,

Defendant.

AFFIDAVIT OF KEVIN LEWIS

COUNTY OF LARAMIE        )  
  ) SS  
STATE OF WYOMING        )

I, Kevin Lewis, upon being sworn to tell the truth, depose and state as follows:

1. My name is Kevin Lewis. I am an authorized representative of the Equality State Taxpayers Association. I am over the age of twenty-one years, have never been convicted of a crime, am fully competent to give this Affidavit, and am knowledgeable of the facts stated in this Affidavit.

2. I have represented the Equality State Taxpayers Association in its efforts to obtain records from the Wyoming State Auditor through records requests submitted under the Wyoming Public Records Act. I have reviewed the facts alleged in the complaint and affirm that those facts are true and accurate to the best of my knowledge and belief based upon personal knowledge or a review of pertinent records and correspondence between the parties. I make no representations on legal authority or legal argument contained in the complaint.

3. Equality State Taxpayers Association is a non-profit association of Wyoming taxpayers dedicated to protecting Wyoming taxpayers and working to ensure openness and accountability in government. Equality State Taxpayers Association has joined in the requests made by American Transparency and the Defendant has failed to comply with the records requests. Plaintiff Equality State Taxpayers Association is also a relator in this case for a writ of mandamus brought in the name of the State of Wyoming.

4. In 2018, the Defendant reversed her prior position that she would not produce the requested public records that American Transparency had requested since 2015. The Defendant provided a cost estimate of \$7,820 for complying with the records requests. On or about April 30, 2018, full payment for the costs to be charged by the Defendant to fulfill the Public Records Act requests was delivered.

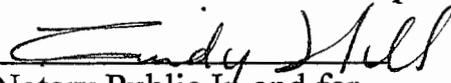
6. Since April 30, 2018, the Defendant has provided approximately only four months and three weeks of a request for five years of data. The Defendant has failed to produce any part of the vendor list that the Equality State Taxpayers Association requested. The Defendant has not provided any commitment as to when the remaining records will be provided and efforts to urge timely compliance with the Public Records Act have been unsuccessful. The instant lawsuit has become necessary to enforce the Plaintiffs' rights under the Wyoming Public Records Act and to compel the Defendant to meet her statutory duties.

7. No action for damages can provide a remedy for the Defendant's failure to fulfill her statutory duties as the nature of the case is to obtain records that will be used to inform citizens across Wyoming and across American on the workings of Wyoming government.

FURTHER AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
KEVIN LEWIS

SUBSCRIBED AND SWORN to before me on this 17<sup>th</sup> day of July, 2018.

  
Notary Public In and for  
the County of Laramie,  
State of Wyoming.

My Commission Expires:

January 30, 2019

