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August 10, 2021

Honorable Judge Jill Clifton
Hearing Clerk's Office
U.S. Department of Agriculture
Stop 9203 South Building, Room 1031
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via email:
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Marilyn.kennedy@usda.gov
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Re: Objection to Order Deferring Ruling on non-party Objection filed 2021 July 23 (Fri), AWA Docket 19-0004

Dear Hon. Judge Clifton:

The Animal Welfare Institute (AWI) objects to the "Order Deferring Ruling on non-party Objection filed 2021 July 23 (Fri)," dated August 9, 2021, because the Order continues to unreasonably impinge on the First Amendment rights of the public and the press to observe and disseminate information about these proceedings, and because the Order lacks any basis that comports with the constitution.

Importantly, although the Order Deferring Ruling contemplates that another Order could potentially be issued on Friday, August 13, 2021, the Order Deferring Ruling explicitly leaves in place restrictions on observation and information dissemination that infringe on the First Amendment with regard to hearings that will be conducted this week, August 9–13, 2021. Given the court's delays regarding AWI's initial request of May 26, 2021 to attend the hearing and subsequent filings, the failure to commit to rendering a decision and order on August 13, 2021 is also of concern.

As described in AWI's original "Objection to Conditions Order," and as detailed more fully below, the limitations that have been imposed on public observation of the hearings in this matter, and on the ability of observers to disseminate information about these hearings, violate AWI's rights under the First Amendment. By continuing to impose those limitations on the hearings scheduled this week, the Order Deferring Ruling is causing irreparable harm to the rights of AWI and of the public and the press. *See Elrod v. Burns*, 427 U.S. 347, 373 (1976) ("The loss of First Amendment freedoms, even for minimal periods of time, unquestionably constitutes irreparable injury.").

For these reasons, AWI formally requests that the Order Deferring Ruling be withdrawn and that AWI be provided with unfettered access to the hearings currently scheduled for August 9–13, 2021, September 20-24, 2021, and any subsequent dates.

DISCUSSION

I. AWI has a First Amendment Right to Unfettered Access to These Hearings

The First Amendment guarantees that members of the press and the public have a right to attend trials, including administrative proceedings such as this one. As the Supreme Court has explained, "in the context of trials . . . the First Amendment guarantees of speech and press, standing alone, prohibit government from summarily closing courthouse doors which had long been open to the public . . . ." *Richmond Newspapers, Inc. v. Virginia*, 448 U.S. 555, 576 (1980). The First Amendment right to attend trials is an aspect of the "virtually absolute protection [accorded] to the dissemination of information or ideas," and *Richmond Newspapers* should be understood as "squarely h[olding] that the acquisition of newsworthy information is entitled to . . . constitutional protections . . . ." *Id.* at 582 (Stevens, J., concurring). Further, "an arbitrary interference with access to important information is an abridgment of the freedoms of speech and of the press protected by the First Amendment." *Id.* at 583 (Stevens, J., concurring).

Although *Richmond Newspapers* concerned a criminal trial, the Supreme Court and Courts of Appeal have also found that the same First Amendment rights guarantee access to civil proceedings, including adjudications by administrative agencies. *See id.* at 580 n. 17 ("Whether the public has a right to attend trials of civil cases is a question not raised by this case, but we note that historically both civil and criminal trials have been presumptively open."); *see also id.* at 573 n.9 (collecting cases establishing the recognition of this principle "in a variety of contexts over the years"). Indeed, "[e]very circuit to consider the issue has concluded that the qualified First Amendment right of public access applies to civil as well as criminal proceedings." *Dhiab v. Trump*, 852 F.3d 1087, 1099 (D.C. Cir. 2017) (Rogers, J., concurring) (collecting cases from the Second, Third, Fourth, Seventh, Eighth, Ninth, and Eleventh Circuits).

As to civil administrative proceedings such as this matter, various Courts of Appeal have unequivocally found that in the absence of an overriding interest in closure, the First Amendment guarantees the public and the press the right to attend and to disseminate information. *New York Civil Liberties Union v. New York City Transit Authority*, 684 F.3d 286, 298–304 (2d Cir. 2012) (finding both based on historical experience and based on logic that administrative proceedings "are subject to a public right of access under the First Amendment"); *see especially id.* at 302 n.12 (collecting support for the proposition that "[t]he tradition of openness in formal administrative adjudicatory proceedings generally has amply demonstrated the favorable judgment of experience"); *see also Detroit Free Press v. Ashcroft*, 303 F.3d 681, 694–95 (6th Cir. 2002) (finding that the First Amendment guarantees the right to attend administrative adjudications over deportation proceedings, and collecting similar holdings from the Third, Sixth, and Ninth Circuits in which these First Amendment standards have been applied to administrative proceedings).

In addition to the overwhelming weight of precedent confirming that this type of civil administrative adjudication is presumptively open to the public, both experience and logic amply demonstrate that a First Amendment right of access applies to this particular proceeding. *See Press-Enterprise Co. v. Superior Court of Cal., County of Riverside* ("*Press-Enterprise II*"), 478 U.S. 1, 9 (1986) ("If the particular proceeding in question passes these tests of experience and logic, a qualified First Amendment right of public access attaches.") As to experience, AWI's understanding is that this particular type of adjudicatory proceeding under the Animal Welfare Act has historically featured unfettered public access; to AWI's understanding, it is only the fact that this particular proceeding is being held remotely that has led to the current restrictions on public access. *See* Order Deferring Ruling at 1–2 (suggesting that "the limited, borrowed, telephone conferencing capacity of this Hearing by Dial-In Telephone Conference . . . is a platform least compatible with APHIS's objective to provide the public with unfettered access to the Hearing."). To AWI's knowledge, no party has provided any contrary evidence. Accordingly, experience amply demonstrates that this type of hearing has historically been open.

Likewise, as to "logic," it is beyond any reasonable dispute that "public access plays a significant positive role in the functioning of the particular process in question." *Press-Enterprise II*, 478 U.S. at 8–9 (recognizing that "many governmental processes operate best under public scrutiny"). The Supreme Court has repeatedly reaffirmed the value of openness to adjudicatory proceedings, noting that "a trial courtroom also is a place where the people generally—and representatives of the media—have a right to be present, and where their presence historically has been thought to enhance the integrity and quality of what takes place." *Richmond Newpapers*, 448 U.S. at 578. As the Court has stressed, public access "enhances the quality and safeguards the integrity of the factfinding process, with benefits to both the defendant and to society as a whole," "fosters an appearance of fairness, thereby heightening public respect for the judicial process . . . [and] permits the public to participate in and serve as a check upon the judicial process—an essential component in our structure of self-government." *Globe Newspaper Co. v. Superior Court for Norfolk Cty.*, 457 U.S. 596, 606 (1982).

Here, in particular, as the USDA itself has noted, public access would ensure "that the truth can be heard and disseminated," ensure that Mr. Moulton's "version of the truth does not negate the First Amendment," and provide an accurate account of how the USDA is "enforcing the AWA, Regulations, and Standards." *See* USDA Response to Animal Welfare Institute's Objection to ALJ's Conditions Order at 3–4. Again, no party has presented any contrary evidence to indicate that public scrutiny fails to play "a significant positive role in the functioning of the particular process in question." *Press-Enterprise II*, 478 U.S. at 8. To the contrary, the USDA's reasoning that "[a] fair and open hearing would allow the facts to be presented, squashing any false information the Respondent is concerned about," USDA Response at 3, is exactly the type of value that the Supreme Court has recognized as supporting a First Amendment right of access. *See Richmond Newspapers*, 448 U.S. at 569 (describing "the importance of openness to the proper functioning of a trial" as providing "assurance that the proceedings were conducted fairly to all concerned").

For these reasons, it is beyond any legitimate dispute that the First Amendment guarantees the right of the press and the public, including AWI, to unfettered public access to these Hearings.

II. There is No Constitutional Basis to Restrict Access to These Hearings

Where, as here, "a qualified First Amendment right of access attaches . . . proceedings cannot be closed unless specific, on the record findings are made demonstrating that closure is essential to preserve higher values and is narrowly tailored to serve that interest." Where, as here, a First Amendment right of access attaches, that interest may be overcome only where there is "an overriding interest based on findings that closure is essential to preserve higher values and is narrowly tailored to serve that interest." *Press-Enterprise II*, 478 U.S. at 13–14. AWI incorporates by reference its prior objections, dated July 23, 2021, specifically including the prior objections that the current restrictions on public access are not based on any specific, on the record findings, and that the current restrictions are in no way narrowly tailored to serve any legitimate overriding interest.

Moreover, AWI's current objection is based on the fact that, as the USDA has observed, Mr. Moulton has provided no evidence sufficient to justify any restrictions on public access. Mr. Moulton bears the burden of demonstrating "a substantial probability" of damage to "compelling or overriding" government interest, rather than a mere "reasonable likelihood." *Id.* at 14 (rejecting a "reasonable likelihood test" that involve a "lesser burden" than the "substantial probability test"). As the party requesting restrictions on access, that burden is squarely and solely Mr. Moulton's. *See U.S. v. Doe,* 63 F.3d 121, 130 (2d Cir. 1995) (noting that "[t]he burden of establishing a substantial probability of danger rests squarely on the shoulders of the movant" requesting that a proceeding be closed).

Moreover, before ordering any restrictions on public access, a decision-maker has procedural obligations that are critical to ensuring that the public and the press are not deprived of their First Amendment rights without due process. The "minimum procedures necessary to protect the first amendment right of access" include that "specific findings must be articulated on the record at the time [a proceeding] is sealed" and "notice and an opportunity to be heard are prerequisites." *Washington Post v. Robinson*, 935 F.2d 282, 288–89 (D.C. Cir. 1991). Where a court does not provide reasonable, written notice and "allow interested parties an opportunity to intervene *before ruling on the motion*," the court violates the constitution. *Id.* at 289 (emphasis added). "[A]dvance notice of a motion to seal is generally necessary to afford interested parties an opportunity to intervene *before* the court hears and rules on the motion." *Id.* at 290 (emphasis in original); *see also In re Hearst Newspapers, LLC,* 641 F.3d 168, 186 (5th Cir. 2011) (A court "deprive[s] the [media] of its First Amendment right of access without due process in refusing to give the press and public . . . notice and an opportunity to be heard before closing the [] proceeding.").

Likewise, before issuing any restriction on access, the court must consider whether less-restrictive alternative approaches could suffice. *See Press-Enterprise Co. v. Superior Court of California, Riverside County* ("*Press-Enterprise I*"), 464 U.S. 501, 511 (1984) ("Absent

consideration of alternatives to closure, the trial court could not constitutionally close the [proceeding]."); *see also id.* at 520 ("[P]rior to issuing a closure order, a trial court should be obliged to show that the order in question constitutes *the least restrictive means available* for protecting compelling state interests." (Marshall, J., concurring) (emphasis in original)).

Where a movant requesting that a proceeding be closed provides evidence purportedly justifying closure, a decision-maker must not only protect the First Amendment right to access, and the right to due process, by providing an opportunity to respond *before* issuing any order closing a proceeding, but also has a duty to closely scrutinize the movant's evidence. Where a movant's claims for closure consist of "conclusory or wholly implausible allegation of danger," a reviewing court "may be justified in denying a closure motion without making any explicit findings of fact." *U.S. v. Doe*, 63 F.3d at 130. Even where a movant's claims go beyond the merely conclusory or implausible, to properly exercise their discretion, courts should evaluate "the adequacy and credibility of the [movant's] affidavit," including the possibility of "a hearing so as to take contrary evidence from the government or *any other party opposing the motion* and to assess the credibility of the [movant] with the aid of cross-examination." *Id.* (emphasis added).

Here, the Order Deferring Ruling, as well as the prior Conditions Order, have violated these important constitutional principles in several ways, depriving AWI of its First Amendment rights without due process of law. First, these orders have imposed restrictions on these hearings without providing AWI any notice or opportunity to be heard before the restrictions were imposed. AWI asked to attend the hearing by letter dated May 26, 2021 and that request was granted on June 24, 2021.[1] Despite this, at 4:23pm on July 22, 2021 – just over one business day before the start of the hearing – observers were emailed a list of restrictions that limit their ability to meaningfully monitor and report on the hearing. This significantly harms AWI, as we have a history of both attending and reporting on such hearings. During the previous research-related AWA hearing – Santa Cruz Biotechnology in 2015 – AWI not only had multiple staff physically attend the hearing, but also posted nightly hearing updates on its website.[2]

Likewise, these restrictions were imposed without any constitutionally adequate specific written findings based on evidence in the record. Third, to the extent these restrictions were imposed based on purported evidence from two telephone conferences at which AWI was not allowed to be present, AWI has never had any opportunity to respond to them. Most critically, because the restrictions on access have been applied to hearings while AWI's objections based on its First Amendment rights are still pending, the restrictions have violated, and continue to violate, AWI's First Amendment rights without any constitutionally adequate due process.

Furthermore, to the extent the restrictions on public access are based on the scanty, conclusory "evidence" that Mr. Moulton has submitted in writing, the restrictions lack any constitutional basis because Mr. Moulton's purported evidence is wholly inadequate to justify any restrictions on access. To begin with, Mr. Moulton has provided *absolutely no evidence*

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[1] Email from Erin Hoagland, Attorney Advisor, Office of Administrative Law Judges; "Judge Clifton asked me to inform you that she has approved the Animal Welfare Institute's request to attend the virtual hearing in AWA Docket No. 19-0004."

[2] https://awionline.org/content/information-santa-cruz-biotechnology-inc

indicating that any of the organizations seeking access to these Hearings have harmed or would harm any cognizable interest. Indeed, *none of Mr. Moulton's purported evidence has anything to do with AWI*. Instead, Mr. Moulton has conflated AWI with other organizations, particularly PETA, *that are not seeking access to these proceedings.* Because Mr. Moulton's evidence thus fails to provide any basis to believe that the entities actually seeking access to these Hearings would in any way harm any cognizable interest, he has entirely failed to justify any restrictions on public access.

Notably, AWI's original Objection, dated July 23, 2021, specifically explained that Mr. Moulton had not identified any evidence explaining how AWI's participation could possibly harm any cognizable interest. In Mr. Moulton's response, dated August 6, 2021,[3] he did not identify any way in which AWI or any other organization actually requesting access would impair any cognizable overriding interest. Instead, Mr. Moulton again offered the ostensible conduct of PETA as a weak excuse to infringe on the public's right to attend these hearings. Additionally, Mr. Moulton's description of PETA's conduct is inconsistent with his own purported evidence: for example, Mr. Moulton speculates that PETA was somehow "made aware of what [Mr. Moulton] had to say in [his] opening remarks," but in fact the letter from PETA attached to Mr. Moulton's comments specifically noted that PETA obtained its information from Mr. Moulton's "letter to the Administrative Law Judge," a publicly available document. The fact that Mr. Moulton could not even accurately describe PETA's one-page letter—the sole evidence Mr. Moulton supplied in response to AWI's objection—undermines Mr. Moulton's credibility.

Further, Mr. Moulton has deeper credibility problems that should be taken into account. Mr. Moulton has the been the subject of at least two disciplinary actions by the Minnesota Bar which resulted in law license suspensions. On September 28, 2006, Moulton was suspended from the practice of law for a minimum of 90 days for failing to file and timely pay hundreds of thousands of dollars in state and federal employer withholding tax returns for the period of 1998 through 2005.[4] In its Opinion the court notes that "the referee's findings and conclusion are based at least in part on credibility determinations."[5] The Court added that an aggravating factor not addressed by the referee is the fact that some of Moulton's misconduct took place while he was on probation between March 22, 2002, and March 2004.[6] Moulton's reinstatement was denied on August 6, 2007 and again on March 31, 2010.[7] He was then granted conditional reinstatement/probation on June 10, 2010.

Although Mr. Moulton eventually satisfied the older outstanding tax liabilities, during the time of his conditional reinstatement he failed to remain current on his tax obligations on numerous occasions resulting in a second petition for disciplinary action filed on March 18, 2019

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[3] AWI also objects to the fact that it was not provided with a copy of Mr. Moulton's August 6 response and had no way to know that this response existed, until it was mentioned in the Order Deferring Ruling. AWI was forced to specifically request a copy. This delay in providing information that is directly germane to AWI's constitutional rights provides yet another example of why it is crucial for these hearings to be held in a truly open manner.

[4] *In re Moulton*, 721 N.W.2d 900 (Minn. 2006), *as modified*, 733 N.W.2d 777 (Minn. 2007) (order).

[5] *In re Moulton*, 721 N.W.2d 900, 905 (Minn. 2006).

[6] *Id*. at 904; *See* FN 7: "The referee does not find Respondent's claims credible."

[7] http://lprb.mncourts.gov/LawyerSearch/pages/LawyerSearchResults.aspx?k=0136888

which resulted in a second suspension. The Supreme Court upheld this second suspension in a Per Curiam opinion dated July 1, 2020. In upholding the suspension, the Court noted that "[t]he referee found that Moulton's disciplinary history, the fact that his misconduct was intentional, his failure to recognize the wrongful nature of his misconduct, his selfish motivation, and his lack of remorse were all aggravating factors."[8] The Court also noted its "concern about Moulton's commitment to abiding by his professional obligations is heightened by the referee's finding that Moulton attempted to minimize the seriousness of his misconduct and blamed others for his misconduct."[9]

Because Mr. Moulton has failed to provide any credible evidence justifying any restrictions on access to these Hearings, he has entirely failed to carry "[t]he burden of establishing a substantial probability of danger" to any overriding government interest. *See U.S. v. Doe,* 63 F.3d at 130.

Finally, to the extent that your orders have expressed concern about witness harassment, I wish to explicitly assure you that neither AWI nor its members condone nor engage in the harassment of anyone. For example, AWI's official policy, explained on its website, states that "[w]hile AWI's mission is to alleviate the suffering of nonhuman animals, the principle followed by AWI of compassion and nonviolence applies to human animals as well as nonhuman animals. The Animal Welfare Institute condemns violence directed against all living creatures. **There are no exceptions."** AWI, *Who We Are*, https://awionline.org/content/who-we-are (emphasis added). This principle, which animates all of the work that AWI does, ensures that AWI does not undertake or condone any type of harassment or intimidation.

Moreover, AWI's work to promote the welfare of animals by engaging with policy-makers, scientists, industry, and the public depends fundamentally on AWI's credibility; as such, AWI has no interest in peddling falsehoods, as Mr. Moulton baselessly accuses. Indeed, Mr. Moulton has identified absolutely no way in which AWI's dissemination of information regarding his chinchilla ranch ostensibly spreads any falsehoods—because no such evidence exists. To the contrary, AWI's website describing Mr. Moulton's chinchilla ranch, as well as these Hearings, serves an important public purpose by disseminating accurate, truthful information, based on publicly available evidence including USDA's own Inspection Reports, photos, and various filings in this court case that AWI has obtained through the Freedom of Information Act and which are available to the public. The accurate dissemination of such information cannot by any fair definition be construed as any effort to harass or intimidate anyone.

Finally, to the extent that you are concerned about any conduct of third parties, such as the actions that Mr. Moulton has described, it is incumbent on you as a decision-maker tasked with the protection of due process and the First Amendment, to seriously consider the Supreme

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[8] *In re Petition for Disciplinary Action against Daniel J. Moulton, a Minnesota Attorney*, *Registration No. 0136888*, Case A19-0444 at *12, available at http://lprb.mncourts.gov/LawyerSearch/casedocs/MOULTON-A19-0444-07012020.pdf

[9] *In re Petition for Disciplinary Action against Daniel J. Moulton, a Minnesota Attorney, Registration No. 0136888*, Case A19-0444 at *13.

Court's guidance on how "public trials ha[ve] significant community therapeutic value." *Richmond Newspapers*, 448 U.S. at 570. As the Court explained:

> When a shocking crime occurs, a community reaction of outrage and public protest often follows. Thereafter the open processes of justice serve an important prophylactic purpose, providing an outlet for community concern, hostility, and emotion. Without an awareness that society's responses to criminal conduct are underway, natural human reactions of outrage and protest are frustrated and may manifest themselves in some form of vengeful 'self-help,' as indeed they did regularly in the activities of vigilante 'committees' on our frontiers. The accusation and conviction or acquittal, as much perhaps as the execution of punishment, operate to restore the imbalance which was created by the offense or public charge, to reaffirm the temporarily lost feeling of security and, perhaps, to satisfy that latent urge to punish.

Id. at 571. Further, as the Supreme Court admonished, "The crucial prophylactic aspects of the administration of justice cannot function in the dark; no community catharsis can occur if justice is done in a corner or in any covert manner." *Id.* at 571–72. "A result considered untoward may undermine public confidence, and where the trial has been concealed from the public view an unexpected outcome can cause a reaction that the system at best has failed and at worst has been corrupted." *Id.* As the Supreme Court has thus explained, closure of proceedings such as these Hearings can have profoundly harmful effects on the public's perception of whether justice is being fairly and impartially administered.

III. The Order Deferring Hearing Constitutes an Ongoing Constitutional Violation

For the reasons described above and in AWI's original Objection dated July 23, 2021, the restrictions on public access to these Hearings, and to the ability to accurately disseminate information about these Hearings, violate the constitution. Moreover, these restrictions have been imposed in a manner that violates the right to due process, because they have been imposed, and are continuing to be imposed, in a manner that has deprived, and will continue to deprive, AWI of its rights to due process.

AWI understands that the current restrictions on access are animated in part by the use of a "limited, borrowed, telephone conferencing capacity" that you consider "a platform least compatible with APHIS's objective to provide the public with unfettered access to the Hearing," Order Deferring Ruling at 1–2. However, AWI believes that the presently available technology is quite capable of providing unfettered access to these Hearings that comports with the constitution. To the extent the technology is not up to the task, the appropriate course of action is not to infringe on the First Amendment; it is to find suitable technology.

Similarly, to the extent that your "primary objective remains to gather evidence (testimony and exhibits) upon which my Decision and Order will be based, and to do so without losing the days already scheduled August 9-13 (Mon-Fri) 2021," Order Deferring Ruling at 1, this is also an insufficient basis to infringe on the First Amendment. The desire not to lose trial

days already scheduled is understandable, but such concerns of administrative convenience are hardly an "overriding interest" sufficient to outweigh the public's First Amendment rights. Furthermore, the time constraints in this case are a situation that the court has repeatedly created. This court waited almost two months after AWI's May 26, 2021 request to attend this hearing – and almost a month after the court granted AWI access on June 24, 2021 – to issue its restrictions on July 22, 2021, just a little more than one business day before the first week of the hearing started. After AWI filed its Objection the very next day, July 23, Erin Hoagland, Attorney Advisor, Office of Administrative Law Judges stated in an email that "Judge Clifton will set dates for responses to the Objection at an appropriate time next week." That did not occur. Instead, this court issued an order dated Monday, August 2 (which was not provided to AWI until the morning of August 3) granting a deadline for responses by the end of the day on Friday, August 6 leaving NO business days before the second week of hearings which started on August 9. Then, on August 9, the court further delayed a decision until the conclusion of this second week of hearings. Even if this interest were of constitutional weight, the Order Deferring Ruling is not narrowly tailored to serve that interest. The appropriate course would be to issue a ruling that protects the public's First Amendment rights without delay, so that the Hearing may proceed as scheduled and in the open manner that the constitution and our system of government demand. *See Richmond Newspapers*, 448 U.S. at 569 (noting that openness is "an indispensable attribute of an Anglo-American trial").

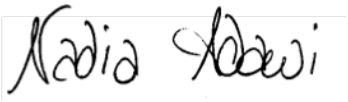
The ongoing deprivation of the First Amendment right to access is causing irreparable harm to AWI. *See Elrod v. Burns*, 427 U.S. at 373 ("The loss of First Amendment freedoms, even for minimal periods of time, unquestionably constitutes irreparable injury."). It is no consolation that the Order Deferring Ruling contemplates that AWI *might* have access to *some* of the Hearings in the future; to the contrary, the Supreme Court has explicitly found that the deprivation of access even to a portion of a trial is a violation of the First Amendment. *See Press-Enterprise Co. v. Superior Court of California, Riverside County*, 464 U.S. 501, 511 (1984) (rejecting as unconstitutional limits on access to *voir dire* proceedings even though the public had access to several days of such proceedings).

CONCLUSION

Because the Conditions Order dated July 22, 2021, and the Order Deferring Ruling dated August 9, 2021, constitute ongoing violations of the First Amendment, AWI objects to these orders. AWI requests that these orders be rescinded and that AWI immediately be provided unfettered access to the Hearings in this matter.

Thank you for your consideration.

Sincerely,



Nadia Adawi
Executive Director/General Counsel

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CERTIFICATE OF SERVICE

Daniel J. Moulton, a/k/a Dan Moulton, d/b/a Moulton Chinchilla Ranch, Respondent
Docket: 19-0004

Having personal knowledge of the foregoing, I declare under penalty of perjury that the information herein is true and correct, and this is to certify that a copy of the OBJECTION TO ORDER DEFERRING RULING ON NON-PARTY OBJECTION FILED 2021 JULY 23 (FRI), AWA DOCKET 19-0004 has been furnished and was served upon the following parties on August 10, 2021 by the following:

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Respectfully Submitted,

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