No. 21-533

In the Supreme Court of the United States

BRAD MARTIN, IN HIS INDIVIDUAL CAPACITY AND AS AN EMPLOYEE OF THE ARIZONA DEPARTMENT OF PUBLIC SAFETY; STATE OF ARIZONA,

Petitioners,

v.

CARLOS CASTRO,

Respondent.

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT

BRIEF IN OPPOSITION

BENJAMIN L. RUNDALL
COUNSEL *of Record*
HONOR LAW GROUP, PLLC
4450 S. RURAL RD., STE. C-220
TEMPE, AZ 85282
(602) 282-0223
RUNDALL@HONORLAWGROUP.com

QUESTION PRESENTED

1. Whether the Ninth Circuit correctly held that permitting a police dog to continue biting a handcuffed suspect could constitute excessive force.

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INTRODUCTION

In March 2017, a group of police officers and a SWAT team executed a search warrant to arrest Respondent at his home. Respondent fled, but officers soon apprehended him on the roof of a neighboring house and shot him twice with a Taser, causing him to fall from the roof. *See* Pet. App. 16–19. An officer deployed a police dog as a "pain compliance tool" to subdue Respondent and commanded the police dog to bite Respondent's left calf. *See* Pet. App. 20. Police video shows the police dog bit Respondent for at least 50 seconds, including a 12- to 26-second period after he had been handcuffed. *See* Pet. App. 26. The bite caused severe, permanently disfiguring injuries to Respondent's leg that have required multiple surgeries and extensive physical therapy. Pet. App. 26.

Respondent sued the detective who handled the police dog and the state of Arizona under 42 U.S.C. § 1983. The district court denied Petitioners' motion for summary judgment, holding that genuine disputes of fact precluded summary judgment and qualified immunity. Pet. App. 29–32. The Ninth Circuit affirmed, explaining that its "caselaw is clear that an officer cannot direct a police dog to continue biting a suspect who has fully surrendered and is under the officer's control." Pet. App. 4–5 (citing *Hernandez v. Town of Gilbert*, 989 F.3d 739, 745 (9th Cir. 2021)).

This application of established doctrine to the particular facts presented here does not warrant review. First, the decision below is a correct and straightforward application of *Graham v. Connor*, 490 U.S. 386 (1989), and this Court's precedent concerning unreasonable force and qualified immunity. Second, there is no split of authority on the question

presented. None of the cases Petitioners cite to portray a conflict involved a police dog biting a handcuffed suspect, and Petitioners offer no reason to believe that any other court of appeals would have reached a different decision than the Ninth Circuit did below. Indeed, decades of Ninth Circuit caselaw—and caselaw from other courts of appeals—make clear that the use of a police dog on a handcuffed suspect in Respondent's position is unreasonable. Third, because of its procedural posture—and the genuine disputes of material fact identified by both the district court and the Ninth Circuit—this case would be a poor vehicle for this Court's review.

The Petition should be denied.

STATEMENT

On March 11, 2017, a group of ten police officers and a SWAT team executed a search warrant to arrest Respondent at his home. Pet. App. 15, 19. Respondent fled, but the officers soon spotted him on the roof of a neighboring house. Pet. App. 15–16. The officers ordered Respondent to come down, but he instead said "I'm done," raised his hands, and sat on the roof while illuminated by a police spotlight. Pet. App. 16. Police then fired a Taser at Respondent, who again repeated "I'm done, I'm done." Pet. App. 18. Police then fired a second Taser at Respondent, who immediately fell from the roof. Pet. App. 19.

The facts that follow are disputed, *see* Pet. App. 19 ("The parties further dispute what happened once [Respondent] was on the ground."), but the police video of Respondent's arrest makes clear that the police dog bit him for at least 12 seconds after he was handcuffed. "The dog bite caused severe, permanent-

ly disfiguring injuries to [Respondent's] leg that have required multiple surgeries and extensive physical therapy to treat." Pet. App. 26.

Respondent filed suit under 42 U.S.C. § 1983, asserting vicarious liability state law claims against the State of Arizona for battery (Count One), intentional infliction of emotional distress (Count Two), and gross negligence (Count Four). Respondent also asserted a Fourth Amendment excessive force claim against Detective Brad Martin, who deployed the police dog (Count Three). Pet. App. 7. Respondent alleged that the police dog bit him for 44 seconds after he was handcuffed.

The district court concluded that Detective Martin was not entitled to summary judgment or qualified immunity on Count Three. Pet. App. 27–28. The court denied Detective Martin's motion for summary judgment because "[b]ased on the record evidence, there is a genuine issue of material fact whether the force used was greater than reasonable under the circumstances." Pet. App. 27–28. And it concluded he was not entitled to qualified immunity, explaining that the Ninth Circuit's decisions in *Guy v. City of San Diego*, 608 F.3d 582 (9th Cir. 2010), *Mendoza v. Block*, 27 F.3d 1357 (9th Cir. 1994), *Watkins v. City of Oakland*, 145 F.3d 1087 (9th Cir. 1998), and *Hartsell v. Cnty. of San Diego*, 802 F. App'x 295 (9th Cir. 2020) (mem. op.), establish that "[n]o reasonable officer could have believed that it was lawful to use a K9 to continue to bite a suspect after he was handcuffed and lying still." Pet. App. 31.

The district court also concluded that Arizona was not entitled to state law qualified immunity or state law statutory immunity on Respondent's state law claims. Pet. App. 32–36. The district court ex-

plained that "there are disputed issues of material fact precluding summary judgment on the basis of qualified immunity under Arizona law," Pet. App. 33, and "on the basis of Arizona's justification statutes," Pet. App. 36.

Petitioners filed an interlocutory appeal, and the Ninth Circuit affirmed. The Ninth Circuit explained that its "caselaw is clear that an officer cannot direct a police dog to continue biting a suspect who has fully surrendered and is under the officer's control." Pet. App. 4–5 (citing *Hernandez*, 989 F.3d at 745). The court also observed that the genuine disputes of material fact identified by the district court preclude summary judgment on Respondent's claims. Pet. App. 5.

Petitioners then filed a petition for a writ of certiorari.

REASONS FOR DENYING THE WRIT

This Court should deny certiorari for three reasons. First, the decision below is a correct and straightforward application of this Court's precedent. Second, there is no split of authority on the question presented. None of the cases Petitioners cite to portray a conflict involved police officers permitting a police dog to bite a handcuffed suspect, and Petitioners offer no reason to believe that any other court of appeals would have reached a different decision than the Ninth Circuit did below. Third, because of its procedural posture—and the genuine disputes of material fact identified by both the district court and the Ninth Circuit—this case would be a poor vehicle for this Court's review.

A. The Decision Below Is Correct.

Certiorari is unwarranted because the Ninth Circuit correctly applied established law to the facts of this case.

1. Detective Martin's use of a police dog to bite Respondent after Respondent was handcuffed constituted excessive force.

"Qualified immunity attaches when an official's conduct does not violate clearly established statutory or constitutional rights of which a reasonable person would have known." *White v. Pauly*, 137 S. Ct. 548, 551 (2017) (per curiam) (internal quotation marks omitted). A right is clearly established when it is "sufficiently clear that every reasonable official would have understood that what he is doing violates that right." *Mullenix v. Luna*, 577 U.S. 7, 11 (2015) (per curiam) (internal quotation marks omitted).

Courts employ an objective-reasonableness test to evaluate whether an officer has used excessive force in violation of the Fourth Amendment. *Graham*, 490 U.S. at 387. Whether an officer has used excessive force depends on "the facts and circumstances of each particular case, including the severity of the crime at issue, whether the suspect poses an immediate threat to the safety of the officers or others, and whether he is actively resisting arrest or attempting to evade arrest by flight." *Id.* at 396.

The evidence, viewed in the light most favorable to Respondent, the non-movant, supports a finding that Petitioners used excessive force. *See Smith v. City of Hemet*, 394 F.3d 689, 701 (9th Cir. 2005). First, "the quantum of force used," *see id.*, against Respondent "was enough to cause severe physical injury," Pet. App. 26. The police dog bit Respondent for at least 50 seconds, possibly as long as 88 sec-

onds. Pet. App. 26. And it "caused severe, permanently disfiguring injuries to [Respondent's] leg that have required multiple surgeries and extensive physical therapy to treat." Pet. App. 26.

Second, the *Graham* factors did not favor the use of such severe force, *see Hemet,* 394 F.3d at 701, either before Respondent had been handcuffed (when his conduct did not suggest he posed a safety risk or might flee further) or after (when he could not have posed a safety risk or fled further). Although the district court found that the government's interest in apprehending Respondent—who had been accused of robbery—was substantial, Respondent posed no risk to officer safety while "handcuffed and subdued." *See* Pet. App. 4a; *Graham*, 490 U.S. at 397. Nor could Respondent have fled, *see Graham*, 490 U.S. at 397, due to both the handcuffs and the fact police officers had just Tasered him twice and caused him to fall off of a roof, Pet. App. 23–24. Petitioners offer no basis upon which to conclude the government's interest in applying force to a "handcuffed and subdued" suspect, *see* Pet. App. 4, is substantial. The continued police dog bite was thus greater force than necessary under the circumstances.

2. The decision below defines the issue at the appropriate level of generality, and is entirely consistent with this Court's precedent.

The decision below is correct, and does not incorrectly frame the legal issue presented at too high a level of generality. Indeed, Ninth Circuit "caselaw is clear that an officer cannot direct a police dog to continue biting a suspect who has fully surrendered and is under the officer's control," *Hernandez*, 989 F.3d at 745, and squarely refutes Petitioners' theory that Detective Martin was not on notice that his use of force violated the Fourth Amendment, *see* Pet. 25. In

1994, the Ninth Circuit considered a § 1983 claim filed by a suspect bitten by a dog while handcuffed. *Mendoza*, 27 F.3d at 1358–59. The court explained that "no particularized case law is necessary for a deputy to know that excessive force has been used when a deputy sics a canine on a handcuffed arrestee who has fully surrendered and is completely under control." *Id.* at 1362. In 1998, the Ninth Circuit applied *Mendoza* to hold "that it was clearly established that excessive duration of the [police dog] bite and improper encouragement of a continuation of the attack by officers could constitute excessive force that would be a constitutional violation," and affirmed denial of qualified immunity. *Watkins*, 145 F.3d at 1093; *see also Koistra v. County of San Diego*, 310 F. Supp. 3d 1066, 1082–84 (S.D. Cal. 2018) (denying qualified immunity to officer who used police dog against suspect "who had surrendered by putting her arms up and asserted she was unarmed"). Multiple courts of appeals have reached similar conclusions. *See, e.g.*, *Cooper v. Brown*, 844 F.3d 517, 524 (5th Cir. 2016) (denying qualified immunity on the basis that "permitting a dog to continue biting a compliant and non-threatening arrestee is objectively unreasonable."); *Priester v. City of Riviera Beach, Fla.*, 208 F.3d 919, 927 (11th Cir. 2000) (no reasonable officer could believe that the use of a dog to attack and bite a plaintiff, who had submitted to the police when he was discovered, and did not pose a threat of bodily harm or attempt to flee or resist arrest, was lawful force).

Petitioners seek to confuse the issue by eliding the distinction between a permissible dog bite of an at-large suspect and an impermissible dog bite of a detained suspect. But this Court's precedent requires that courts consider whether a suspect is

handcuffed in evaluating whether the force used was reasonable by instructing courts to evaluate "whether the suspect poses an immediate threat to the safety of the officers or others," and "whether he is actively resisting arrest or attempting to evade arrest by flight." *See Graham*, 490 U.S. at 396. Whether a suspect has been handcuffed bears directly on each of these questions: after being handcuffed, a suspect poses a substantially lower threat to the safety of officers and others, and cannot evade arrest by flight. *Cf. McCoy v. Meyers*, 887 F.3d 1034 (10th Cir. 2018) (previously dangerous situation faced by officers did not justify post-restraint beating and carotid restraint because suspect was handcuffed, had ceased resisting, and could not flee); *Cavanaugh v. Woods Cross City,* 625 F.3d 661, 666 (10th Cir. 2010) ("It is not objectively reasonable to ignore specific facts as they develop (which contradict the need for [a particular] amount of force), *in favor of prior general information about a suspect*.") (emphasis added).

For these reasons, multiple courts have recognized that force may be unreasonable against a detained suspect but not against an un-detained one. For example, in *Crenshaw v. Lister*, the Eleventh Circuit held it was objectively reasonable for an officer to briefly use the force exerted by a police dog to subdue and detain an armed suspect until he could be handcuffed. 556 F.3d 1283, 1291–93 (11th Cir. 2009). And in *Priester v. City of Riviera Beach, Fla.*, the Eleventh Circuit held it was objectively unreasonable for police officers to allow a police dog to bite and hold a suspect for two minutes, which, adopting plaintiff's characterization, the court described as "an eternity." 208 F.3d 919, 924 (11th Cir. 2000). In *Edwards v. Shanley*, the Eleventh Circuit acknowledged the consistency of its prior decisions in *Lister*

and *Priester*, applying *Priester* to reverse a grant of qualified immunity for an officer who ordered a dog attack on a compliant suspect. 666 F.3d 1289, 1297–98 (11th Cir. 2012).

Multiple other courts of appeals also recognize this rule. In *Lamont v. New Jersey*, the Third Circuit held that "even where an officer is initially justified in using force, he may not continue to use such force after it has become evident that the threat justifying the force has vanished." 637 F.3d 177, 184 (3rd Cir. 2011). In *Waterman v. Batton*, the Fourth Circuit held that "force justified at the beginning of an encounter is not justified *even seconds later* if the justification for the initial force has been eliminated. 393 F.3d 471, 481 (4th Cir. 2005) (emphasis added). In *Cooper v. Brown*, the Fifth Circuit held with respect to a fleeing misdemeanor suspect that "permitting a dog to continue biting a compliant and non-threatening arrestee is objectively unreasonable," requiring the officer to "assess not only the need for force, but also the relationship between the need and the amount of force used," and concluded that Fifth Circuit caselaw "makes *certain* that once an arrestee stops resisting, the degree of force an officer can deploy is reduced." 844 F.3d at 523–24 (emphasis added). In *Baker v. City of Hamilton*, the Sixth Circuit emphasized that it has "held repeatedly that the use of force after a suspect has been incapacitated or neutralized is excessive as a matter of law." 471 F.3d 601, 607 (6th Cir. 2006). In *Becker v. Elfreich*, the Seventh Circuit explained that it has been "well-established that police officers cannot continue to use force once a suspect is subdued." 821 F.3d 920, 928 (7th Cir. 2016) (quoting *Abbott v. Sangamon County, Ill.* 705 F.3d 706, 732 (7th Cir. 2013) (dating the well-established right prior to 2007)). And in *Hol-*

land ex rel. Overdorff v. Harrington, the Tenth Circuit held that it was objectively unreasonable to hold four handcuffed detainees at gunpoint while a search was conducted "after they had completely submitted to the SWAT deputies initial show of force," after which the justification for the threat of deadly force had "simply evaporated." 268 F.3d 1179, 1197 (10th Cir. 2001). Likewise, the decision below correctly applied this Court's qualified immunity jurisprudence.

Further, there is no conflict between the decision below and this Court's decision in *City and County of San Francisco v. Sheehan,* 575 U.S. 600 (2015). In *Sheehan*, this Court held that police officers who twice entered the room of a disabled woman living in a group home, in response to her threats to kill a social worker and others—while holding a knife—were entitled to qualified immunity in the woman's § 1983 claim. *Id.* at 611–12. This Court explained that cases concerning "needlessly withholding sugar from an innocent person who is suffering an insulin reaction," *see Graham*, 490 U.S. at 388–89, concerning "an officer's use of a beanbag gun to subdue 'an emotionally disturbed' person who 'was unarmed . . . and had not committed any serious offense,'" *see Deorle v. Rutherford*, 272 F.3d 1272, 1275 (9th Cir. 2001), and concerning officers' shooting back (and killing) a suspect who shot at them, *see Alexander v. City and County of San Francisco*, 29 F.3d 1355, 1358 (9th Cir. 1994), did not clearly establish that it was unreasonable to forcibly enter the home of an armed, mentally ill suspect. *Sheehan*, 575 U.S. at 614–15. "No matter how carefully a reasonable officer read *Graham*, *Deorle*, and *Alexander* beforehand, that officer could not know" his or her conduct violated the law. *Id.* at 616. By contrast, the Ninth Circuit's

caselaw on the question presented has been clear for years. *See* Pet. App. 4a–5a ("Our caselaw is clear that an officer cannot direct a police dog to continue biting a suspect who has fully surrendered and is under the officer's control.") (*quoting Hernandez*, 989 F.3d at 745).

Finally, amici's argument that this Court's recent decision in *Rivas-Villegas v. Cortesluna*, No. 20-1539, 2021 WL 4822662 (2021) (per curiam) warrants reversal is incorrect. There, the Ninth Circuit relied upon a single case in defining a purportedly clearly established right, holding that kneeling on the back of a visibly injured suspect could be unconstitutional. *Cortesluna v. Leon*, 979 F.3d. 645, 654 (9th Cir. 2020) (*rev'd sub nom Rivas-Villegas v. Cortesluna*, No. 20-1539)). This Court, finding the Fourth Amendment infringement in *Rivas-Villegas* to be non-obvious, reversed both for want of precedent and because the decision below defined the excessive force employed at too general a level to have placed the statutory or constitutional question beyond debate. *Rivas-Villegas v. Cortesluna* No. 20-1539, 2021 WL 4822662 at *4 (citing *White v. Pauly*, 137 S. Ct. 548, 551 (2017)). No such deficiency plagues the Ninth Circuit's decision in this case. *See Mendoza*, 27 F.3d at 1361–62; *Watkins*, 145 F.3d at 1093.

B. The Petition Does Not Implicate a Genuine Split of Authority Warranting Resolution by This Court.

Certiorari is also unwarranted because the Petition does not present a conflict of authority that warrants this Court's review.

Petitioner contends that the decision below conflicts with decisions from the Fifth, Sixth, and Eighth Circuits. But two of these four decisions are unpublished, and none even hint at—much less acknowledge—a conflict of authority on the question presented. That is because each case involved a range of factual circumstances that differed from those presented here, and only the decision below involved a police dog bite of a handcuffed suspect.

The decision below does not conflict with the Fifth Circuit's decision in *Escobar v. Montee*, 895 F.3d 387 (5th Cir. 2018), which did not involve a police dog biting a handcuffed suspect. Escobar assaulted his wife and ran from police officers who were pursuing him by foot and by helicopter. *Id.* at 390. During the chase, the officers were informed that Escobar had a knife, and Escobar's mother "had called and said the police would have to kill Escobar to catch him; he would not go without a fight." *Id.* The officers deployed a police dog, which bit Escobar while his knife was on the ground within his reach. *Id.* at 390–91.

The Fifth Circuit's conclusion that this use of force was not unreasonable turned largely on the fact that the dog bite occurred while Escobar was in the process of surrendering—during which time he had a knife nearby, which his mother had told officers he might use—*before he had been handcuffed*: "Given the information from Escobar's mother and the nature of the chase (at night, through multiple backyards in a residential neighborhood), [the officer] had reason to doubt the sincerity of Escobar's surrender. And because the knife remained within reach, [the officer] could reasonably believe that Escobar—if the dog was called off before handcuffing—would then try to harm someone." *Id.* at 395–96; *see also id.* at

395 ("A reasonable officer could easily conclude that Escobar's surrender was not genuine."). Because Escobar, unlike Respondent, had not been handcuffed, there is no reason to believe the Fifth Circuit would have reached a different outcome in this case.

Nor does the decision below conflict with the Sixth Circuit's decision in *Zuress v. City of Newark*, 815 F. App'x 1 (6th Cir. 2020), which makes no mention of the suspect being handcuffed during the police dog bite. In *Zuress*, police officers attempted to initiate a traffic stop of a Jeep following a confidential informant's tip about suspected drug activity. *Id.* at 3. The Jeep's driver pulled over, stopped the vehicle, and "abruptly opened the driver's side door and fled." *Id.* While officers pursued the driver, Zuress—the Jeep's passenger—"drove away without authorization." *Id.* Zuress was later intercepted and pulled over. Upon exiting the Jeep, Zuress repeatedly failed to comply with officers' commands and instead "waved her hands around, and reached down towards her waistband." *Id.* Officers then released a police dog, who bit Zuress's left arm. *Id.* The police dog's bite continued while other officers approached the suspect, while officers checked the Jeep "for other occupants," *see id.*, while one officer switched places with another on top of Zuress to hold her down, and while an officer attempted to get the police dog to release its bite (which took 24 seconds). *Id.*

The Sixth Circuit's conclusion that the officer's use of force was not unreasonable turned largely on this particular sequence of events. The court "acknowledged that it is possible for 'a delay in calling off a police dog to rise to the level of an unreasonable seizure,'" but explained that the "facts here do not support a Fourth Amendment violation." *See id.* at 7 (internal citations omitted). First, the period

before the police officer attempted to get the police dog to release its bite was not an unreasonable use of force because during that time the officer was working to ensure officer safety by, for example, checking the Jeep for other suspects. *Id.* Second, the 24-second period during which the officer attempted to get the police dog to release its bite was not an unreasonable use of force because the "continued bite was not a 'means intentionally applied' to Zuress, and thus "did not constitute a violation of the Fourth Amendment." *Id.* at 7–8; *see also Greco v. Livingston Cty.*, 774 F.3d 1061, 1064 (6th Cir. 2014) (a "delay in calling off [a police] dog . . . may rise to the level of an unreasonable seizure").

Nor does the decision below conflict with the Eight Circuit's decision in *Kuha v. City of Minnetonka*, 365 F.3d 590 (8th Cir. 2003), which also did not involve a police dog biting a handcuffed suspect. After a police officer pulled him over following a night of drinking, Kuha "opened his door, got out, looked at the officer, and ran from his car." *Id.* at 595. The officer called for backup, and a police dog found Kuha and bit him for about 10 to 15 seconds. *Id.* at 596. The officer "repeatedly told Kuha he would not call off the dog until Kuha let go of the dog and put his hands up." *Id.* "Kuha eventually complied and [the officer] called off the dog." *Id.*

The Eighth Circuit concluded that "a jury could properly find it objectively unreasonable to use a police dog trained in the bite and hold method without first giving the suspect a warning and opportunity for peaceful surrender," but that the officer did not use unreasonable force in requiring Kuha to release the police dog before calling off the dog. *Id.* at 598, 601. *Kuha* thus has no bearing on the question presented here.

C. This Case Would Be a Poor Vehicle to Review the Question Presented.

Even if this Court were interested in clarifying its qualified immunity jurisprudence, this case would be a poor vehicle for doing so.

First, the decision below is fact-bound and key facts remain disputed. *See, e.g.*, Pet. App. 13a (dispute regarding Respondent's criminal history), 16a (dispute regarding "much of what happened while [Respondent] was on the roof"), 19a ("The parties further dispute what happened once [Respondent] was on the ground."), 21a–22a (dispute regarding Respondent's purported attempt to escape, whether Detective Martin had reason to fear Respondent was armed, and length of dog bite), 33a ("there are disputed issues of material fact precluding summary judgment"), 36a (same). This Court is "a court of final review and not first view," *Zivotofsky v. Clinton*, 566 U.S. 189, 201 (2012) (quoting *Adarand Constructors, Inc. v. Mineta*, 534 U.S. 103, 110 (2001)), and therefore should let the lower courts resolve these key disputes.

Second, even if the question presented were worthy of certiorari—which it is not—this case is a classic instance of where this Court should permit the issue to percolate further. Two of the four court of appeals cases in the purported split were unpublished, and none acknowledge a split of authority on the question presented. The benefits of percolation have long been recognized as a reason for denying certiorari. As Justice Frankfurter observed: "A case may raise an important question but the record may be cloudy. It may be desirable to have different aspects of an issue further illuminated by the lower courts. Wise adjudication has its own time for ripen-

ing." *Maryland v. Baltimore Radio Show*, 338 U.S. 912, 918 (1950).

Issues are presented for this Court's review where the record is clear, and courts of appeals have struck fundamentally different stances on a key legal question. When cases present that clear record and affirmatively take a stance in light of the current caselaw, this Court will have the benefit of the analysis and cross-commentary of various courts. That is not the case here, where no cited case has identified a conflict of authority and the district court and Ninth Circuit have warned that the record below is characterized by genuine disputes of material fact regarding multiple key issues.

CONCLUSION

For the foregoing reasons, the Petition should be denied.

Respectfully submitted,

BENJAMIN L. RUNDALL
Counsel of Record
HONOR LAW GROUP, PLLC
4450 S. Rural Rd.
Suite C-220
Tempe, AZ 85282
(602) 282-0223
rundall@honorlawgroup.com

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