

ARKANSAS STATE CLAIMS COMMISSION

-Claim Form-

Please note that all sections must be completed, or this form will be returned to you, which will delay the processing of your claim.

1. Claimant's Legal Counsel - ☐ (If representing yourself (Pro Se) please check this box and proceed to section 2)

Arkansas
State Claims Commission

(last name) (first name) (email) OCT 17 2023

(address) (city) (state) (zip) (primary phone) RECEIVED

Arkansas Bar Number: _____

If not licensed to practice law in Arkansas, please contact the Claims Commission for more information.

2. Claimant

Sanders, Leticia
(title/last name/first name or company)

(email)

(address) (city) (state) (zip) (primary phone)

3. State Agency Involved: (must be an Arkansas state agency. The Arkansas Claims Commission has no jurisdiction over county, city, or other municipalities)

State of Arkansas

(state agency involved)

4. Incident Date

January 01, 2023

5. Claim Type Motion of violation of AR. Const. ART. 6 sections ~

Please provide a brief explanation of your claim. If additional space is required please attach additional statements to this form.

See Attached paperwork

- 5a. Check here if this claim involves damage to a motor vehicle. ☐

- 5b. Check here if this claim involves damage to property other than a motor vehicle. ☐

All property damage claims require a copy of your insurance declarations covering the property or motor vehicle at the time of damage.

I did not have insurance covering my property/motor vehicle at the time of damage. ☐

All property damage claims require ONE of the following (please attach):

1. Invoice(s) documenting repair costs, OR
2. Three (3) estimates for repair of the damaged property, OR
3. An explanation why repair bill(s) or estimate(s) cannot be provided.

6. Was a state vehicle involved? (If Yes, please complete the following section)

No

(type of state vehicle involved)

(license number)

(driver)

7. Check here if this claim involves personal injury.

All personal injury claims require a copy of your medical insurance information and relevant medical bills in place at the time of the incident.

I do not have health insurance ☐

8. Amount Sought: _____

The undersigned certifies that to the best of my knowledge, information, and belief, this claim is not being presented for any improper purpose; this claim is warranted by existing law or by a non-frivolous argument for extending, modifying, or reversing existing law or for establishing new law; and the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery.

Leticia Sanders

Claimant

ACKNOWLEDGEMENT

State of Arkansas
County of Pulaski

On this the 17th day of October, 2023, before me, the undersigned notary, personally appeared Leticia Sanders known to me (or satisfactorily proven) to be the person whose name is subscribed to this instrument and acknowledged that he/she executed the same for the purposes therein contained.

In witness whereof I hereunto set my hand and official seal.

[Signature]
Signature of Notary Public

My Commission expires: 3-29-2027



ARKANSAS STATE CLAIMS COMMISSION

Arkansas
State Claims Commission

OCT 17 2023

LETICIA SANDERS

CLAIMANT

RECEIVED

v.

STATE OF ARKANSAS

RESPONDENT

**MOTION OF VIOLATION OF AR. CONST. ART. 6 § 5 &
MOTION TO SUE ARKANSAS STATE.FOR VIOLATION AR .CONST ART 6 § 5.**

Now before the Arkansas State Claims Commission Claimant Leticia Sanders is filing a Motion of Violation of AR CONST. ART 6 § 5 which is as follows:

1. No person shall be eligible to the office of governor except a citizen of the United States, who shall have attained the age of thirty years old and shall have been seven years a resident of this state.
2. The state of Arkansas has allowed Sarah Huckabee Sanders to violate the written qualification law for the residents of this state.
3. Sarah Huckabee Sanders ascended to the role of press secretary on July 31, 2017.
4. Sarah Huckabee Sanders is not eligible for the governing seat until July 31, 2024.
5. Even if Sarah Huckabee Sanders ascended to her role of press secretary in 2016, Huckabee will still be ineligible until 2023 which means she has violated the laws and rules of the written Arkansas Constitution.
6. I am suing the State of Arkansas for the violation of Arkansas Constitution Article 6 Section 5 in the amount of \$10,000,000.00.

7. I will urge other residents to file a claim with Arkansas State Claims Commission as well.

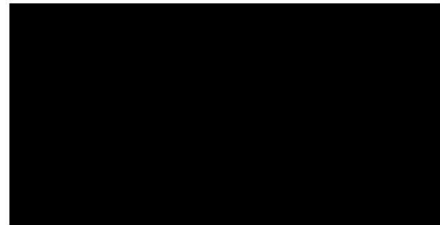
8. Sarah Huckabee Sanders must resign immediately for violation of AR.CONST. ART. 6 § 5.

Wherefore the Claims Commission must reserve awards for claimants. For allowing this illegal position to take place against the Constitution.

Sincerely submitted,

Leticia Sanders

By: Leticia Sanders



CERTIFICATE OF SERVICE

I Leticia Sanders hereby certify that a true and correct copy was delivered by U.S.

Mail to respondent at the address 101 E Capitol Avenue, Suite 410 Little Rock,

AR 72201, on or about this 18th, day of October 2023.

From: [ASCC New Claims](#)
To: John.Payne@ArkansasAG.gov; [Katie Wilson](#)
Cc: [Kathryn Irby](#)
Subject: CLAIM: Leticia Sanders v. SOA, Claim No. 240613
Date: Wednesday, November 8, 2023 11:22:00 AM
Attachments: [Leticia Sanders SOA agency ltr .pdf](#)
[Leticia Sanders Claim.pdf](#)

Please see attached. Contact Kathryn Irby with any questions.

Thank you,
Caitlin

Caitlin McDaniel

Administrative Specialist II

Arkansas State Claims Commission

101 East Capitol Avenue, Suite 410

Little Rock, Arkansas 72201

(501) 682-1619

ARKANSAS STATE CLAIMS COMMISSION

(501)682-1619
FAX (501)682-2823



KATHRYN IRBY
DIRECTOR

101 EAST CAPITOL AVENUE
SUITE 410
LITTLE ROCK, AR 72201-3823

November 8, 2023

Mr. John Payne
Arkansas Attorney General's Office
323 Center Street, Suite 200
Little Rock, Arkansas 72201

(via email)

RE: ***Leticia Sanders v. State of Arkansas***
Claim No. 240613

Dear Mr. Payne,

Enclosed please find a copy of the above-styled claim filed against the State of Arkansas. Pursuant to the Arkansas Rules of Civil Procedure, as well as Claims Commission Rule 2.2, you have **thirty days from the date of service** in which to file a responsive pleading.

Your responsive pleading should include your agency number, fund code, appropriation code, and activity/section/unit/element that this claim should be charged against, if liability is admitted, or if the Claims Commission approves this claim for payment. This information is necessary even if your agency denies liability.

Sincerely,

Kathryn Irby

ES: cmcdaniel

cc: Leticia Sanders, *Claimant* (w/o encl.)

<p><u>Note to Claimant or Claimant's counsel:</u> The Claims Commission copied you on this correspondence to provide you with confirmation that your claim has been processed and served upon the respondent agency.</p>

From: [John Payne](#)
To: [ASCC New Claims](#); [Katie Wilson](#)
Cc: [Kathryn Irby](#); [Laura Purvis](#); [Noah Watson](#)
Subject: RE: CLAIM: Leticia Sanders v. SOA, Claim No. 240613
Date: Wednesday, November 8, 2023 2:15:32 PM
Attachments: [Leticia Sanders SOA agency ltr .pdf](#)
[Leticia Sanders Claim.pdf](#)

Kathryn,

Laura Purvis and Noah Watson will defend this claim. Laura is copied on this email and will provide her contact information by separate communication.

Let us know if you have any questions.

Thanks-

John Payne

Deputy Attorney General | Civil Litigation Division



From: ASCC New Claims <ASCC.New.Claims@arkansas.gov>
Sent: Wednesday, November 8, 2023 11:23 AM
To: John Payne <john.payne@arkansasag.gov>; Katie Wilson <katie.wilson@arkansasag.gov>
Cc: Kathryn Irby <Kathryn.Irby@arkansas.gov>
Subject: CLAIM: Leticia Sanders v. SOA, Claim No. 240613

Please see attached. Contact Kathryn Irby with any questions.

Thank you,
Caitlin

Caitlin McDaniel

Administrative Specialist II

Arkansas State Claims Commission

101 East Capitol Avenue, Suite 410

Little Rock, Arkansas 72201

(501) 682-1619

From: [Laura Purvis](#)
To: [Kathryn Irby](#)
Subject: Re: CLAIM: Leticia Sanders v. SOA, Claim No. 240613
Date: Wednesday, November 8, 2023 2:20:33 PM

You don't often get email from laura.purvis@arkansasag.gov. [Learn why this is important](#)

Hello Kathryn,

I hope you are well today! As John mentioned, I will be defending this claim. If you need to reach me, my contact information is laid out in the signature block below.

All the best,

Laura Purvis
Assistant Attorney General – Civil Litigation Division

Office of Attorney General Tim Griffin
323 Center Street, Suite 200 | Little Rock, Arkansas 72201
Office: (501) 320-3085 | Email: laura.purvis@arkansasag.gov

From: John Payne <john.payne@arkansasag.gov>
Sent: Wednesday, November 8, 2023 2:15 PM
To: ASCC New Claims <ASCC.New.Claims@arkansas.gov>; Katie Wilson <katie.wilson@arkansasag.gov>
Cc: Kathryn Irby <Kathryn.Irby@arkansas.gov>; Laura Purvis <laura.purvis@arkansasag.gov>; Noah Watson <noah.watson@arkansasag.gov>
Subject: RE: CLAIM: Leticia Sanders v. SOA, Claim No. 240613

Kathryn,

Laura Purvis and Noah Watson will defend this claim. Laura is copied on this email and will provide her contact information by separate communication.

Let us know if you have any questions.

Thanks-

John Payne

Deputy Attorney General | Civil Litigation Division



From: ASCC New Claims <ASCC.New.Claims@arkansas.gov>
Sent: Wednesday, November 8, 2023 11:23 AM
To: John Payne <john.payne@arkansasag.gov>; Katie Wilson <katie.wilson@arkansasag.gov>

Cc: Kathryn Irby <Kathryn.Irby@arkansas.gov>

Subject: CLAIM: Leticia Sanders v. SOA, Claim No. 240613

Please see attached. Contact Kathryn Irby with any questions.

Thank you,
Caitlin

Caitlin McDaniel

Administrative Specialist II

Arkansas State Claims Commission

101 East Capitol Avenue, Suite 410

Little Rock, Arkansas 72201

(501) 682-1619

From: [Laura Purvis](#)
To: [ASCC Pleadings](#)
Cc: [Monique Fleming](#)
Subject: Sanders v. State of Arkansas, Claim No. 240613
Date: Wednesday, December 6, 2023 10:02:29 AM
Attachments: [Sanders_MTD BIS.pdf](#)
[Sanders_Notice of Appearance.pdf](#)

You don't often get email from laura.purvis@arkansasag.gov. [Learn why this is important](#)

Good morning,

Please find attached for filing my Notice of Appearance and Respondent's Motion to Dismiss and Incorporated Brief in Support for the above-referenced claim.

Thank you,

Laura Purvis
Assistant Attorney General – Civil Litigation Division

Office of Attorney General Tim Griffin
323 Center Street, Suite 200 | Little Rock, Arkansas 72201
Office: (501) 320-3085 | Email: laura.purvis@arkansasag.gov

**BEFORE THE STATE CLAIMS COMMISSION
OF THE STATE OF ARKANSAS**

LETICIA SANDERS

CLAIMANT

v.

CASE NO. CC-240613

STATE OF ARKANSAS

RESPONDENT

**RESPONDENT’S MOTION TO DISMISS
AND INCORPORATED BRIEF IN SUPPORT**

I. INTRODUCTION AND FACTS

Claimant, Leticia Sanders, brings this Claim alleging that “[t]he state of Arkansas has allowed Sarah Huckabee Sanders to violate the written qualification law for the residents of this state.” Claim at ¶ 2. And, without offering any factual allegations, Sanders also alleges that “Sarah Huckabee Sanders is not eligible for the governing seat until July 31, 2024.” *Id.* at ¶ 4. Sanders now requests the State Claims Commission award her \$10,000,000 and order the Governor to immediately resign “for the violation of Arkansas Constitution Article 6 Section 5.” *Id.* at ¶ 6.

Ultimately, Sanders’s claim is moot under Arkansas precedent; she does not allege facts about the State of Arkansas’s actions, much less facts showing that the State violated the Arkansas Constitution; and to the extent she seeks injunctive relief, her claim falls outside the jurisdiction of the Commission.

II. STANDARD OF REVIEW

Arkansas is a fact-pleading jurisdiction. The Supreme Court of Arkansas “has specifically and deliberately rejected the theory of notice-pleading.” *Arkansas Dep’t of Env’t Quality v. Brighton Corp.*, 352 Ark. 396, 403, 102 S.W.3d 458, 463 (2003). The Arkansas Rules of Civil Procedure make it clear that a complaint fails to state a claim unless it contains specific facts which,

if true, would entitle the plaintiff to some relief. Rule 8(a) provides that “[a] pleading which sets forth a claim for relief . . . *shall* contain . . . a statement in ordinary and concise language of facts showing that . . . the pleader is entitled to relief[.]” Ark. R. Civ. P. 8 (emphasis added).

Accordingly, a complaint must state facts sufficient to allege a viable cause of action. *Martin v. Equitable Life Assur. Soc. of the U.S.*, 344 Ark. 177, 180, 40 S.W.3d 733, 736 (2001). This means that the *facts* must be sufficient to establish the elements of the claim. *Alvarado v. St. Mary-Rogers Mem’l Hosp., Inc.*, 99 Ark. App. 104, 107, 257 S.W.3d 583, 586 (2007). Simply reciting the elements of a claim and alleging that the defendant violated them is not enough because a plaintiff’s legal conclusions are not assumed to be true. *Nelms v. Morgan Portable Bldg. Corp.*, 305 Ark. 284, 288, 808 S.W.2d 314, 316 (1991).

III. ARGUMENT

A. Sanders’ Claim should be dismissed for failure to state facts upon which relief can be granted.

Sanders’ claim against the State of Arkansas for allegedly violating Art. 6, § 5 of the Arkansas Constitution is unfounded and lacks the factual allegations necessary to state a claim for relief. Art. 6, § 5 of the Arkansas Constitution states, “No person shall be eligible to the office of Governor except a citizen of the United States who shall . . . have been seven years a resident of this State.”¹ Sanders’s claim fails for three reasons.

First, Sanders’s claim is moot. She has not asserted any cause of action, but the Supreme Court of Arkansas has held that “once the election takes place, the issue of a candidate’s eligibility under [ARK. CODE ANN.] § 7-5-207(b) [which is the statute that allows a “special action” to

¹ There is no statutory or case law in Arkansas establishing that a Governor’s seven-year residency must have been the seven years immediately prior to the Governor’s term.

challenge a candidate's qualifications] becomes moot." *Clement v. Daniels*, 366 Ark. 352, 355, 235 S.W.3d 521, 523 (2006). Thus, the Commission should dismiss Sanders's claim as moot.

Second, Sanders failed to allege any facts about how the State violated the gubernatorial residency requirement. She also fails to allege any facts about where the Governor resided before she was elected (or even where she resides now). And even if she did, Arkansas law requires an analysis of the candidate's intended "domicile." *Id.* at 355, 235 S.W.3d at 524. "In other words, the determination of residence is a question of intention, to be ascertained not only by the statements of the person involved, but also from his conduct concerning the matter of residence." *Id.* Further, a candidate for office will not obtain a new place of residency "until he abandons his old one," and this abandonment must be evidenced by the candidate's intent (e.g., where the candidate votes, maintains a license, files income taxes, etc.). *Id.* A person need not physically remain in a state to maintain a domicile in that state. *Id.* at 358, 235 S.W.3d at 526.

Taking the minimal facts that Sanders has alleged as true, she fails to state any facts about the Governor's intended domicile being anywhere other than the State of Arkansas, and because of this, it is also impossible for Sanders to show that the State of Arkansas violated its own Constitution.

Third, to the extent that Sanders seeks injunctive relief from the Claims Commission (i.e., Claim at ¶ 8 stating "Sarah Huckabee Sanders must resign immediately"), the Commission does not have jurisdiction since this form of relief is not barred by sovereign immunity. *See* ARK. CODE ANN. § 19-10-204(a)(1).

IV. CONCLUSION

For these reasons, the Commission should dismiss Sanders' Claim entirely as moot and for failure to state facts upon which relief can be granted. At the very least, it should dismiss her claim for injunctive relief for lack of jurisdiction.

Respectfully submitted,

TIM GRIFFIN
Attorney General

By: /s/ Laura Purvis
Laura Purvis
Ark Bar No. 2023239
Assistant Attorney General
Arkansas Attorney General's Office
323 Center Street, Suite 200
Little Rock, AR 72201
PH: (501) 320-3085
Fax: (501) 682-2591
Email: laura.purvis@arkansasag.gov

Attorneys for Respondent

CERTIFICATE OF SERVICE

I Laura Purvis, hereby certify that on December 6, 2023, I filed the foregoing with the Arkansas State Claims Commission via ASCCPleadings@Arkansas.gov and mailed the foregoing document by U.S. Postal Service to the following non-electronic filing participant:

Leticia Sanders
[REDACTED]
[REDACTED]

/s/ Laura Purvis
Laura Purvis

**BEFORE THE STATE CLAIMS COMMISSION
OF THE STATE OF ARKANSAS**

LETICIA SANDERS

CLAIMANT

v.

CASE NO. CC-240613

STATE OF ARKANSAS

RESPONDENT

NOTICE OF APPEARANCE

Assistant Attorney General Laura Purvis hereby enters her appearance as counsel for the Respondent, the State of Arkansas, and requests that all future services and correspondence be sent accordingly.

Respectfully submitted,

TIM GRIFFIN
Attorney General

By: /s/ Laura Purvis
Laura Purvis
Ark Bar No. 2023239
Assistant Attorney General
Arkansas Attorney General's Office
323 Center Street, Suite 200
Little Rock, AR 72201
Phone: (501) 320-3085
Fax: (501) 682-2591
Email: laura.purvis@arkansasag.gov

Attorneys for Respondent

CERTIFICATE OF SERVICE

I Laura Purvis, hereby certify that on December 6, 2023, I filed the foregoing with the Arkansas State Claims Commission via ASCCPleadings@Arkansas.gov and mailed the foregoing document by U.S. Postal Service to the following non-electronic filing participant:

Leticia Sanders
[REDACTED]
[REDACTED]

/s/ Laura Purvis
Laura Purvis

DEC 15 2023

ARKANSAS STATE CLAIMS COMMISSION

LETICIA SANDERS

CLAIMANT

RECEIVED

v.

Case No. CC-240613

STATE OF ARKANSAS

RESPONDENT

**MOTION TO OPPOSE RESPONDENT'S MOTION TO DISMISS AND
MOTION TO SUBPENOA TAXES & PROPERTY RECORDS FOR DOMICILE**

1. INTRODUCTION AND FACTS

Respondent, Attorney General Laura Purvis, brings a response alleging that Sarah Huckabee Sanders has not violated the written qualification law for the residents of this state due to domicile. Rule 2.26-51-102(9),((c) states that in situations where it is not clear if the requirements of either domicile (a) or place of abode (b) have been met, a residency determination can only be made after thoroughly reviewing the facts on a case-by-case basis. When reviewing the facts, the Supreme Court of Arkansas has held that we are not bound to accept a taxpayer's claims of intent when the circumstances point to a contrary conclusion. Furthermore, when acts are inconsistent with a taxpayer's declarations, the acts will be controlled, and our conclusions regarding residency should be based on the facts and circumstances proved. The following factors should be reviewed in making a residency determination:

*Address used on federal income tax returns;

*Address used on telephone, utility and commercial documents;

- *Address used on real and personal property tax documents;
- *Location of Taxpayer. How often and for how long is Taxpayer present at the location at issue;
- *Location of immediate family, such as spouse and children;
- *Length of time in Arkansas of Taxpayer and immediate family;
- *Absence of factors in other states.

II. STANDARD OF REVIEW

Arkansas may be a fact-pleading jurisdiction. The case and controversy: the standing issue while the power of the Judicial review is not found expressly in the Constitution. The Court does not function as an advisory board. It only resolves disputes. Substantial factor a major consideration of the elements for requirements for a cause of action documentary rules of evidence and statutes that govern the admissibility of evidence. You can only be a full resident of one state. After Huckabee Sanders left the White House in June of 2019, she became a commentator for fox news. The legality of the quality or state of being in accordance with the law. Huckabee has committed an illegal action which violates the Antitrust laws-Sherman Act section 1 and the Clayton Act. According to 203Limitations Statutes Applicable to suits against the government; the statutes create a new legal liability, with the right to a suit for its enforcement, provided the suit is brought within twelve months, and not otherwise.

III. ARGUMENT

A. Sanders' Claim should not be dismissed for the facts that the State has violated the Constitution rules for qualifying Huckabee Sanders and Claimant Sanders should be granted the request relief.

Claimant Sanders, claim is valid, Huckabee Sanders has not spent more than six months in the State of Arkansas to be considered domiciled to be the Governor of Arkansas. First, Huckabee has not had a known permanent address for her parents left Arkansas in 2009, relocating to Florida at 756 Blue Mountain Rd, in Santa Rosa Beach according to the Arkansas Democrat-Gazette. What school was Huckabee Sanders children registered at for seven years while Sarah Huckabee traveled while in the political field? What job has Huckabee Sanders spouse held for seven years in the state of Arkansas? What is Huckabee Sanders permanent address for seven years that she paid utilities at? Why did Huckabee Sanders have to purchase a home instead of moving back to the home she claimed to have domiciled? According to 203 Limitations Statutes applicable to suits against the government, one has twelve months to bring a suit. As a known running candidate Claimant Sanders has the right to file a suit.

Second, the state has violated the claimant in the Judicial system to allow this illicit action. A suite will be filed in the federal Courts for Claimant has a civil right to do so as an entity of the United States and of Arkansas. Huckabee has lived across the country and her parents in Florida for about eleven years. Claimant has listed the violation of the State and Sarah Huckabee Sanders illicit acts. Sarah Huckabee Sanders was reported as a known liar when she was the press secretary according to public

reported records. At <https://mydmv.arkansas.gov> one must obtain an Arkansas driver's license and register your vehicle within 30 days of becoming a resident. It is illegal to possess two different state-issued driver's licenses at the same time. However, it is possible to carry diverse types of driver's licenses-if you are in the military, moved from overseas, or have an international driver's permit. A driver's license is permitted where one spends most of one's time. The claimant did state how the State violated the gubernatorial residency requirement with *Id.* Arkansas Constitution Article 6 section 5 which is the gubernatorial requirements.

Third, Claimant Sanders has grounds to file a claim to the Federal Court and the Supreme Court in Washington for the violation of the local government. Case and Controversy *Id.* The standing issue while the power of Judicial review is not found expressly in the Constitution, The Court does not act and an advisory board. It resolves disputes that will be entered into by the Federal Courts. Also, Sarah Huckabee Sanders must submit proof of residency to be considered domiciled for it is not clear of her residency before returning back to Arkansas and her Parents returning to Arkansas in 2020. Substantive laws- Laws that define our rights and obligations (202)514-2000 U.S. Department of Justice 203 Limitations statutes applicable to suites against the government. *Id.* 2-26 Ark. Code §51-102(9),(c). I stand corrected of Sarah Huckabee Sanders resign dated and returned date in 2019 instead of 2017. For she was a commentator for Fox news not in Arkansas. I require that the Court prove Huckabee Sanders was domicile in Arkansas for residency and requirements to hold the governor

seat in Arkansas is legitimate to the Constitution. Did Sarah Huckabee Sanders file her taxes in 2017-2019 in Washington or Arkansas? The claimant had to file with an agency and will file with federal courts jurisdiction also. Claimant filed with the Arkansas Commission to acknowledge the illegal act of the state actions to violate Arkansas Constitution and a removal will be filed with the proper Courts for jurisdiction of Huckabee Sanders removal for her illicit act to become the governor of Arkansas.

IV. CONCLUSION

For these reasons, the Commission should not dismiss Claimant Sanders' Claim as moot and for the state to prove Huckabee residency as domicile in Arkansas with her filed taxes, children school registration for seven years, personal paid taxes in Arkansas, and known domicile resident for seven years. At the very least, it should grant claimant's claim for relief of the States violation of the known illicit act. The claimant does not have to list what state Huckabee Sanders returned from giving Huckabee Sanders has been living in Washington in 2017-2019, New York, and Florida where her parents resided for eleven years or even Iowa. The State needs to prove domicile for seven years with taxes, residency, spouse job location, and children registered school. For when Sarah Huckabee Sanders returned to Arkansas she purchased a \$600,000 home in Little Rock, she did not return to a domicile residency.

Respectfully submitted,
Leticia Sanders
Leticia Sanders, pro se



CERTIFICATE OF SERVICE

I Leticia Sanders, hereby certify that a true and correct copy was delivered by U.S. certified mail to respondent at address 323 Center Street, Suite 200 Little Rock, AR 72201 on or about this 15th day of December 2023.

From: [Laura Purvis](#)
To: [ASCC Pleadings](#)
Cc: [Monique Fleming](#)
Subject: Sanders v. State of Arkansas, Claim No. 240613
Date: Friday, December 22, 2023 1:22:57 PM
Attachments: [Sanders Reply to Response to MTD.pdf](#)

You don't often get email from laura.purvis@arkansasag.gov. [Learn why this is important](#)

Good afternoon,

Please find attached for filing Respondent's Reply to Claimant's Response to Motion to Dismiss for the above-referenced claim.

Thank you,

Laura Purvis
Assistant Attorney General – Civil Litigation Division

Office of Attorney General Tim Griffin
323 Center Street, Suite 200 | Little Rock, Arkansas 72201
Office: (501) 320-3085 | Email: laura.purvis@arkansasag.gov

**BEFORE THE STATE CLAIMS COMMISSION
OF THE STATE OF ARKANSAS**

LETICIA SANDERS

CLAIMANT

v.

CASE NO. CC-240613

STATE OF ARKANSAS

RESPONDENT

**RESPONDENT’S REPLY TO CLAIMANT’S RESPONSE TO
MOTION TO DISMISS**

On December 15, 2023, Claimant, Leticia Sanders, filed a response to Respondent’s motion to dismiss attempting to supplement her original Claim with new facts, making conclusory statements about what federal and state law requires, and requesting that the State prove the Governor’s residency prior to her taking office. Claimant does not address the arguments made in Respondent’s motion to dismiss. Instead, she raises new, confusing legal arguments that seem to fall outside the scope of her original claims.

In order to survive dismissal, Arkansas Rule of Civil Procedure 12(b)(6) requires that a complaint state facts upon which relief can be granted. A complaint fails to state a claim unless it contains specific facts which, if true, would entitle the plaintiff to some relief. Rule 8(a) provides that “[a] pleading which sets forth a claim for relief . . . *shall* contain . . . a statement in ordinary and concise language of facts showing that . . . the pleader is entitled to relief[.]” Ark. R. Civ. P. 8 (emphasis added).

Claimant Sander’s Claim still does not satisfy the fact-pleading requirements set forth by the Arkansas Rules of Civil Procedure. Therefore, the Commission should disregard Claimant’s response to the motion to dismiss and dismiss her original Claim entirely as moot and for failure to state facts upon which relief can be granted.

Respectfully submitted,

TIM GRIFFIN
Attorney General

By: /s/ Laura Purvis
Laura Purvis
Ark Bar No. 2023239
Assistant Attorney General
Arkansas Attorney General's Office
323 Center Street, Suite 200
Little Rock, AR 72201
PH: (501) 320-3085
Fax: (501) 682-2591
Email: laura.purvis@arkansasag.gov

Attorneys for Respondent

CERTIFICATE OF SERVICE

I Laura Purvis, hereby certify that on December 22, 2023, I filed the foregoing with the Arkansas State Claims Commission via ASCCPleadings@Arkansas.gov and mailed the foregoing document by U.S. Postal Service to the following non-electronic filing participant:

Leticia Sanders

[REDACTED]
[REDACTED]

/s/ Laura Purvis
Laura Purvis

From: [REDACTED]
To: [ASCC Pleadings](#)
Cc: [REDACTED]
Subject: Reply to Respondents CC-240613
Date: Tuesday, January 2, 2024 2:42:45 PM
Attachments: [BEFORE THE STATE CLAIMS COMMISSION reply 12_29_23.docx](#)

You don't often get email from [REDACTED]. [Learn why this is important](#)

Hello, upon receiving this email, I Leticia Sanders request a copy of today's stamp of receiving the opposed reply. Please, email the stamp copy today. Thank you.

Respectfully Submitted,

Leticia Sanders

BEFORE THE STATE CLAIMS COMMISSION
OF THE STATE OF ARKANSAS

LETICIA SANDERS

CLAIMANT

v.

CASE NO. CC-240613

STATE OF ARKANSAS

RESPONDENT

**CLAIMANT REPLY TO OPPOSE RESPONDENT'S RESPONSE TO
MOTION TO DISMISS & MOOT**

On December 15, 2023, Claimant Sanders responded to the Respondents response to dismiss the claim filed by claimant. The claimant did not file a new claim, but the claimant responded with a Motion to prove domicile before the claim may be dismissed. Claimant is entitled to request the proper documentation to prove the respondents claim for domicile of Sarah Huckabee Sanders. The claimant has a civil right as an entity in the state of Arkansas to make sure the laws, constitution, rules, and regulations are followed by every human in this state. It is not clear that Sarah Huckabee Sanders is within compliance with Arkansas Constitution Article 6 Section 5. According to *Id.* Rule 2.26-511102(9), (c) states that in situations where it is not clear if the requirements of either domicile(a) or place of abode(b) have been met, residency determination can only be made after thoroughly reviewing the facts on Sarah Huckabee Sanders property for domicile, children school, husband job, and where taxes has been paid. The Respondents want to say domicile with no provided proof in which Claimant has request with Motion to clear the violation of a problematic issue in question. Respondents note that claimant did not provide where Sarah Huckabee

Sanders return from which is not reasonable to dismiss, but reasonable to file a Motion for Respondents to make it clear with proof of domicile. The claimant made it known that Huckabee parents, has not been a resident for eleven years which make them ineligible for their resident to noted domicile. The claimant made it known that Huckabee parents move back in 2020. The claimant respectfully requests that the Commission grants the claimants Motion for Respondent to prove Huckabee -Sanders's domicile due to Huckabee Sanders' return purchasing a \$600,000 home in West Little Rock and no listed domicile property. The Claimant has satisfied the fact-forgoing pleading with the violation of Arkansas Constitution Article 6 Section 5 as the former gubernatorial candidate Huckabee Sanders has violated the Constitution until proven otherwise. The Respondents have a duty to prove domicile documentation and no exhibits attached to confirm domicile.

Respectfully Submitted,

Leticia Sanders

[REDACTED]

[REDACTED]

CERTIFICATE OF SERVICE

I Leticia Sanders, hereby certify that a true and correct copy will be delivered by U.S. mail to respondents at address 323 Center Street, Suite 200 Little Rock, AR 72201 on 29th day of December 2023, or after due to the holidays.

From: [ASCC New Claims](#)
To: [REDACTED]
Bcc: "[Kathryn Irby](#)"
Subject: FW: Reply to Respondents CC-240613
Date: Wednesday, January 3, 2024 2:08:00 PM
Attachments: [BEFORE THE STATE CLAIMS COMMISSION reply 12_29_23.docx](#)

Ms. Sanders, please allow this email to serve as a confirmation of receipt of the attached filing.

Thank you,
Caitlin

Caitlin McDaniel
Administrative Specialist II
Arkansas State Claims Commission
101 East Capitol Avenue, Suite 410
Little Rock, Arkansas 72201
(501) 682-1619

From: Ticia Sanders [REDACTED]
Sent: Tuesday, January 2, 2024 2:43 PM
To: ASCC Pleadings <ascccpleadings@arkansas.gov>
Cc: Ticia Sanders [REDACTED]
Subject: Reply to Respondents CC-240613

You don't often get email from [REDACTED]. [Learn why this is important](#)

Hello, upon receiving this email, I Leticia Sanders request a copy of today's stamp of receiving the opposed reply. Please, email the stamp copy today. Thank you.

Respectfully Submitted,

Leticia Sanders

From: [REDACTED]
To: laura.purvis@arkansasag.gov
Cc: [ASCC Pleadings](#); [REDACTED]
Subject: Fw: Reply to Respondents CC-240613
Date: Thursday, January 4, 2024 1:47:21 PM
Attachments: [BEFORE THE STATE CLAIMS COMMISSION reply 12_29_23.docx](#)

You don't often get email from [REDACTED]. [Learn why this is important](#)

Hello, here is the certificate of service via email of the for-going-pleadings from Claimant.

----- Forwarded Message -----

From: ASCC New Claims <ascc.new.claims@arkansas.gov>
To: [REDACTED]
Sent: Wednesday, January 3, 2024 at 02:08:37 PM CST
Subject: FW: Reply to Respondents CC-240613

Ms. Sanders, please allow this email to serve as a confirmation of receipt of the attached filing.

Thank you,

Caitlin

Caitlin McDaniel

Administrative Specialist II

Arkansas State Claims Commission

101 East Capitol Avenue, Suite 410

Little Rock, Arkansas 72201

(501) 682-1619

From: Ticia Sanders [REDACTED]
Sent: Tuesday, January 2, 2024 2:43 PM
To: ASCC Pleadings <asccpleadings@arkansas.gov>
Cc: Ticia Sanders <[REDACTED]>
Subject: Reply to Respondents CC-240613

You don't often get email from [REDACTED]. [Learn why this is important](#)

Hello, upon receiving this email, I Leticia Sanders request a copy of today's stamp of receiving the

opposed reply. Please, email the stamp copy today. Thank you.

Respectfully Submitted,

Leticia Sanders

BEFORE THE STATE CLAIMS COMMISSION
OF THE STATE OF ARKANSAS

LETICIA SANDERS

CLAIMANT

v.

CASE NO. CC-240613

STATE OF ARKANSAS

RESPONDENT

**CLAIMANT REPLY TO OPPOSE RESPONDENT'S RESPONSE TO
MOTION TO DISMISS & MOOT**

On December 15, 2023, Claimant Sanders responded to the Respondents response to dismiss the claim filed by claimant. The claimant did not file a new claim, but the claimant responded with a Motion to prove domicile before the claim may be dismissed. Claimant is entitled to request the proper documentation to prove the respondents claim for domicile of Sarah Huckabee Sanders. The claimant has a civil right as an entity in the state of Arkansas to make sure the laws, constitution, rules, and regulations are followed by every human in this state. It is not clear that Sarah Huckabee Sanders is within compliance with Arkansas Constitution Article 6 Section 5. According to *Id.* Rule 2.26-511102(9), (c) states that in situations where it is not clear if the requirements of either domicile(a) or place of abode(b) have been met, residency determination can only be made after thoroughly reviewing the facts on Sarah Huckabee Sanders property for domicile, children school, husband job, and where taxes has been paid. The Respondents want to say domicile with no provided proof in which Claimant has request with Motion to clear the violation of a problematic issue in question. Respondents note that claimant did not provide where Sarah Huckabee

Sanders return from which is not reasonable to dismiss, but reasonable to file a Motion for Respondents to make it clear with proof of domicile. The claimant made it known that Huckabee parents, has not been a resident for eleven years which make them ineligible for their resident to noted domicile. The claimant made it known that Huckabee parents move back in 2020. The claimant respectfully requests that the Commission grants the claimants Motion for Respondent to prove Huckabee -Sanders's domicile due to Huckabee Sanders' return purchasing a \$600,000 home in West Little Rock and no listed domicile property. The Claimant has satisfied the fact-forgoing pleading with the violation of Arkansas Constitution Article 6 Section 5 as the former gubernatorial candidate Huckabee Sanders has violated the Constitution until proven otherwise. The Respondents have a duty to prove domicile documentation and no exhibits attached to confirm domicile.

Respectfully Submitted,

Leticia Sanders

[REDACTED]

[REDACTED]

CERTIFICATE OF SERVICE

I Leticia Sanders, hereby certify that a true and correct copy will be delivered by U.S. mail to respondents at address 323 Center Street, Suite 200 Little Rock, AR 72201 on 29th day of December 2023, or after due to the holidays.

BEFORE THE ARKANSAS STATE CLAIMS COMMISSION

LETICIA SANDERS

CLAIMANT

V.

CLAIM NO. 240613

STATE OF ARKANSAS

RESPONDENT

ORDER

Now before the Arkansas State Claims Commission (the “Commission”) is the motion filed by the State of Arkansas (the “Respondent”) to dismiss the claim filed by Leticia Sanders (the “Claimant”). Also pending are other filings by Claimant titled as a motion. Based upon a review of claim file, including Respondent’s motion, and the law of the State of Arkansas, the Commission hereby finds as follows:

1. Claimant filed the instant claim, alleging that Governor Sarah Huckabee Sanders is ineligible to be governor. Claimant alleged violations of the Arkansas Constitution. In support of her claim, Claimant attached a document titled “Motion of Violation of AR. Const. Art. 6§5 & Motion to Sue Arkansas State for Violation AR. Const. Art. 6§5.”¹ In that document, Claimant asserted that the Governor “must resign immediately” due to the constitutional violations.

2. Respondent filed a motion to dismiss, arguing, *inter alia*, that Claimant’s claim should be dismissed for failure to state facts upon which relief can be granted and any claim for injunctive relief is outside the jurisdiction of the Commission.

3. Claimant responded with a document titled “Motion to Oppose Respondent’s Motion to Dismiss and Motion to Subpoena Taxes & Property Records for Domicile.”

¹ Section 5 of Article 6 of the Arkansas Constitution provides that:

No person shall be eligible to the office of Governor except a citizen of the United States, who shall have attained the age of thirty years, and shall have been seven years a resident of this State.

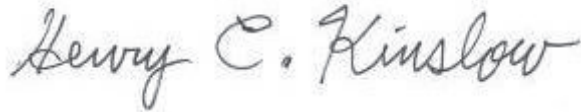
4. Respondent filed a reply brief, arguing that Claimant's claim does not state facts upon which relief can be granted.

5. The Commission finds that Claimant's claim must be dismissed, as the Commission does not have jurisdiction over Claimant's post-election attempt to challenge the Governor's eligibility. Ark. Code Ann. § 19-10-204.²

6. As such, Claimant's claim is DISMISSED for lack of jurisdiction. All other pending motions are hereby rendered moot.

² The Arkansas Supreme Court held in *Oliver v. Phillips* that the "right to contest an election is purely statutory." 375 Ark. 287, 291, 290 S.W.3d 11, 13 (2008). Arkansas law provides for "a statutory right to challenge the eligibility of a candidate before the election" under Ark. Code Ann. § 7-5-207(b). *Id.* at 291, S.W.3d at 14. However, as to a post-election challenge, "the only private right to challenge an election is found under Ark. Code Ann. § 7-5-801, which provides for a challenge by a candidate to contest certification by the county board of election commissioners." *Id.* (emphasis added).

IT IS SO ORDERED.



ARKANSAS STATE CLAIMS COMMISSION
Henry Kinslow



ARKANSAS STATE CLAIMS COMMISSION
Paul Morris, Chair



ARKANSAS STATE CLAIMS COMMISSION
Sylvester Smith

DATE: January 18, 2024

Notice(s) which may apply to your claim

- (1) A party has forty (40) days from the date of this Order to file a Motion for Reconsideration or a Notice of Appeal with the Claims Commission. Ark. Code Ann. § 19-10-211(a)(1). If a Motion for Reconsideration is denied, that party then has twenty (20) days from the date of the denial of the Motion for Reconsideration to file a Notice of Appeal with the Claims Commission. Ark. Code Ann. § 19-10-211(a)(1)(B)(ii). A decision of the Claims Commission may only be appealed to the General Assembly. Ark. Code Ann. § 19-10-211(a)(3).
- (2) If a Claimant is awarded less than \$15,000.00 by the Claims Commission at hearing, that claim is held forty (40) days from the date of disposition before payment will be processed. *See* Ark. Code Ann. § 19-10-211(a). Note: This does not apply to agency admissions of liability and negotiated settlement agreements.
- (3) Awards or negotiated settlement agreements of \$15,000.00 or more are referred to the General Assembly for approval and authorization to pay. Ark. Code Ann. § 19-10-215(b).

From: [Kathryn Irby](#) on behalf of [ASCC Pleadings](#)
To: [REDACTED]; [Laura Purvis](#)
Cc: [Monique Fleming](#); [Mika Tucker](#)
Subject: ORDER: Sanders v. State of Arkansas, Claim No. 240613
Date: Friday, January 19, 2024 1:25:00 PM
Attachments: [C37--Sanders v. SOA, 240613.pdf](#)

Ms. Sanders and Ms. Purvis, please see attached order entered by the Commission.

Thanks,
Kathryn Irby

Arkansas State Claims Commission
101 East Capitol Avenue, Suite 410
Little Rock, Arkansas 72201
(501) 682-1619

BEFORE THE STATE CLAIMS COMMISSION
OF THE STATE OF ARKANSAS

Arkansas
State Claims Commission

FEB 16 2024

RECEIVED

LETICIA SANDERS

CLAIMANT

v.

CASE NO. CC-240613

STATE OF ARKANSAS

RESPONDENT

Motion for Reconsideration with Petition to Amend
& Subpoena Domicile records

I, the Claimant, is requesting reconsideration with a petition to Amend and subpoena Domicile proof for the respondent not submitting proof is admission of guilt as a disqualified leader.

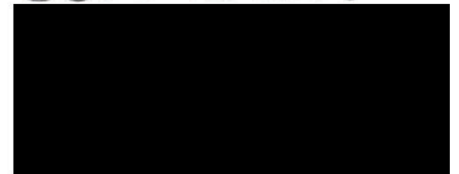
1. The world is aware of respondents Sarah Huckabee Sanders National fabricator.
2. The Respondent has not held a seven-year residence in the state of Arkansas.
3. There is no immunity when one has violated the constitution or law.
4. The Respondent has no proof of spouse job for seven years, or school records for the children for seven years.
5. The Respondent's Huckabee Sanders parents have not resided in Arkansas for eleven years and sold their property in Florida in 2020.
6. The people have a civil duty to make sure everyone abide by the Constitution and the law.
7. Under the Rule of law, the government are accountable under the law.
8. Being a seven-year resident has been adjudicated in Arkansas constitution.
9. It is a violation of claimant civil rights to not hold the Respondent's accountable for not abiding to the Constitution and regulations.

10. Does the Respondent have a right to violate the constitution and not be held accountable?
11. Do the Respondent place themselves in a violation for not providing Domicile documentation?
12. Is it ethical to allow a disqualified person to have a position they do not qualify for, Under a written regulation?
13. What is the state saying to the people, when you will not enforce the constitution or and laws to same people who enforce them.
14. How do you want the people to listen to you and abide if the Respondents will not?
15. Claimant settlement stays the same for the violation of Civil Rights by Respondents.

16. I. Petition to Amend & Subpoena Domicile records.

17. I Petition for the Respondent's to be Subpoena to prove Domicile.
18. Taxes for the past seven years.
19. Spouse job for the past seven years.
20. Children school for the past seven years.
21. The documents must reflect seven years before 2021.
22. As the claimant simultaneously files with the court for a Petition of Domicile documents.

Bethany Smith



Certificate of Service

I Leticia Sandes, pro se hereby certifies that a true and correct copy of the foregoing pleadings was delivered to Respondent Tim Griffin Attorney General State of Arkansas by U.S. mail with proper postage affixed to 323 Center Street, Suite 200 Little Rock, AR 72201, on 16th day of February 2024.

BEFORE THE ARKANSAS STATE CLAIMS COMMISSION

LETICIA SANDERS

CLAIMANT

V.

CLAIM NO. 240613

STATE OF ARKANSAS

RESPONDENT

**ORDER ON CLAIMANT'S
MOTION FOR RECONSIDERATION**


Now before the Arkansas State Claims Commission (the “Commission”) is a motion filed by Leticia Sanders (the “Claimant”) for reconsideration of the Claims Commission’s January 18, 2024, order dismissing Claimant’s claim against the State of Arkansas (the “Respondent”). In that motion, Claimant also filed a “petition to amend & subpoena domicile records.” Based upon a review of the claim file, including the instant motion, and the law of the State of Arkansas, the Commission hereby unanimously finds that Respondent’s motion should be denied, given that Claimant’s motion does not set forth new or additional evidence that was not previously available. *See* Commission Rule 7.1. The Commission further finds that Claimant’s request to amend her claim is untimely, as is her subpoena request, given that her claim has been dismissed.

Regarding Claimant’s statement in her motion that her civil rights are being violated, the Commission does not have jurisdiction to consider such a claim.


IT IS SO ORDERED.



ARKANSAS STATE CLAIMS COMMISSION
Solomon Graves



ARKANSAS STATE CLAIMS COMMISSION
Henry Kinslow



ARKANSAS STATE CLAIMS COMMISSION
Paul Morris, chair

DATE: March 7, 2024

Notice(s) which may apply to your claim

- (1) A party has forty (40) days from the date of this Order to file a Motion for Reconsideration or a Notice of Appeal with the Claims Commission. Ark. Code Ann. § 19-10-211(a)(1). If a Motion for Reconsideration is denied, that party then has twenty (20) days from the date of the denial of the Motion for Reconsideration to file a Notice of Appeal with the Claims Commission. Ark. Code Ann. § 19-10-211(a)(1)(B)(ii). A decision of the Claims Commission may only be appealed to the General Assembly. Ark. Code Ann. § 19-10-211(a)(3).
- (2) If a Claimant is awarded less than \$15,000.00 by the Claims Commission at hearing, that claim is held forty (40) days from the date of disposition before payment will be processed. *See* Ark. Code Ann. § 19-10-211(a). Note: This does not apply to agency admissions of liability and negotiated settlement agreements.
- (3) Awards or negotiated settlement agreements of \$15,000.00 or more are referred to the General Assembly for approval and authorization to pay. Ark. Code Ann. § 19-10-215(b).

From: [Kathryn Irby](#) on behalf of [ASCC Pleadings](#)
To: [REDACTED]; [Laura Purvis](#)
Cc: [Monique Fleming](#); [Mika Tucker](#)
Subject: ORDER: Sanders v. State of Arkansas, Claim No. 240613
Date: Friday, March 8, 2024 7:02:00 AM
Attachments: [14--Sanders -- 240613.pdf](#)

Ms. Sanders and Ms. Purvis, please see attached order entered by the Commission.

Thanks,
Kathryn Irby

Arkansas State Claims Commission
101 East Capitol Avenue, Suite 410
Little Rock, Arkansas 72201
(501) 682-1619

From: [ASCC New Claims](#)
To: [REDACTED]
Subject: FW: ORDER: Sanders v. State of Arkansas, Claim No. 240613
Date: Wednesday, March 20, 2024 1:04:00 PM
Attachments: [14--Sanders -- 240613.pdf](#)

Dear Ms. Sanders,

Per our conversation, please see attached.

Thank you,
Caitlin

Caitlin McDaniel

Administrative Specialist II

Arkansas State Claims Commission

101 East Capitol Avenue, Suite 410

Little Rock, Arkansas 72201

(501) 682-1619

BEFORE THE ARKANSAS STATE CLAIMS COMMISSION

Arkansas
State Claims Commission

MAR 27 2024

RECEIVED

LETICIA SANDERS

CLAIMANT

v.

CLAIM NO. 240613

STATE OF ARKANSAS

RESPONDENT

PETITION FOR A NOTICE OF APPEAL

OF THE FINAL ORDER TO THE GENERAL ASSEMBLY,

AND MOTION FOR A HEARING

Now, before the Arkansas State Claims Commission, the Claimant filed a claim to contest the eligibility and qualification of the Respondent to serve as the Governor of Arkansas in the 2023 election. The Final Order, transmitted on March 7, 2024, states; "Based upon a review of the claim filed including the instant motion, and the law of the State of Arkansas, the Commission hereby unanimously finds that Respondent's motion should be denied, given that Claimant's motion does not set forth new or additional evidence that was not previously available." The Claimant has not presented any new evidence, and the Respondent did not provide any documentation as part of discovery to claim domicile. Allowing an unqualified candidate to hold a position that does not meet the State Rule of law to qualify is a violation. The Respondent is known nationally as a liar and did not suspect anyone would challenge her eligibility as a candidate. The Claimant requested the Respondent to verify with disclosed documentation of domicile in the form of property, children attending schools, spouse's employer, and the state in which she paid taxes. None of the requested documentation has been disclosed. It is on record that Governor Sanders's parents resided in Florida for eleven years and sold

their property in Florida in 2020. As a citizen of the United States of America and a native of this land, the Claimant has all rights to ensure that everyone follows the Rules of the Land, no matter what. Is the government for the people or fame and money? If the government will not lead by example, how can they ask the people to follow in the right direction? The Claimant asks that the General Assembly conduct this matter with due diligence, follow the Rule of Law and the Arkansas Constitution, and grant in favor of the Claimant. The claimant must have a hearing of the allowed violation of Arkansas Constitution. **Exhibit A** is a copy of the Final Order, and **Exhibit B** is a copy of Claimant Motion to Oppose Respondent Motion to Dismiss with a Subpoena for domicile documentation.

Respectfully Submitted,

Leticia Sanders



A handwritten signature in cursive script that reads "Leticia Sanders".

CERTIFICATE OF SERVICE

I Leticia Sanders, pro se hereby certify that a true and correct copy will be delivered by U.S. mail to respondents at address 323 Center Street, Suite 200 Little Rock, AR 72201 on 27th day of March 2024.

BEFORE THE ARKANSAS STATE CLAIMS COMMISSION

LETICIA SANDERS

CLAIMANT

V.

CLAIM NO. 240613

STATE OF ARKANSAS

RESPONDENT

**ORDER ON CLAIMANT'S
MOTION FOR RECONSIDERATION**

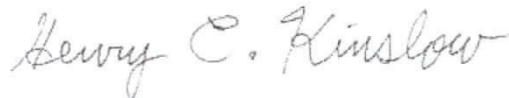
Now before the Arkansas State Claims Commission (the "Commission") is a motion filed by Leticia Sanders (the "Claimant") for reconsideration of the Claims Commission's January 18, 2024, order dismissing Claimant's claim against the State of Arkansas (the "Respondent"). In that motion, Claimant also filed a "petition to amend & subpoena domicile records." Based upon a review of the claim file, including the instant motion, and the law of the State of Arkansas, the Commission hereby unanimously finds that Respondent's motion should be denied, given that Claimant's motion does not set forth new or additional evidence that was not previously available. *See* Commission Rule 7.1. The Commission further finds that Claimant's request to amend her claim is untimely, as is her subpoena request, given that her claim has been dismissed.

Regarding Claimant's statement in her motion that her civil rights are being violated, the Commission does not have jurisdiction to consider such a claim.

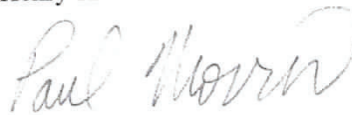
IT IS SO ORDERED.



ARKANSAS STATE CLAIMS COMMISSION
Solomon Graves



ARKANSAS STATE CLAIMS COMMISSION
Henry Kinslow



ARKANSAS STATE CLAIMS COMMISSION
Paul Morris, chair

DATE: March 7, 2024

Notice(s) which may apply to your claim

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- (2) If a Claimant is awarded less than \$15,000.00 by the Claims Commission at hearing, that claim is held forty (40) days from the date of disposition before payment will be processed. *See* Ark. Code Ann. § 19-10-211(a). Note: This does not apply to agency admissions of liability and negotiated settlement agreements.
- (3) Awards or negotiated settlement agreements of \$15,000.00 or more are referred to the General Assembly for approval and authorization to pay. Ark. Code Ann. § 19-10-215(b).

MAR 27 2024

RECEIVED

ARKANSAS STATE CLAIMS COMMISSION

LETICIA SANDERS

CLAIMANT

v.

Case No. CC-240613

STATE OF ARKANSAS

RESPONDENT

MOTION TO OPPOSE RESPONDENT'S MOTION TO DISMISS AND
SUBPOENA
MOTION TO SUBPENOA TAXES & PROPERTY RECORDS FOR DOMICILE

1. INTRODUCTION AND FACTS

Respondent, Attorney General Laura Purvis, brings a response alleging that Sarah Huckabee Sanders has not violated the written qualification law for the residents of this state due to domicile. Rule 2.26-51-102(9),(c) states that in situations where it is not clear if the requirements of either domicile (a) or place of abode (b) have been met, a residency determination can only be made after thoroughly reviewing the facts on a case-by-case basis. When reviewing the facts, the Supreme Court of Arkansas has held that we are not bound to accept a taxpayer's claims of intent when the circumstances point to a contrary conclusion. Furthermore, when acts are inconsistent with a taxpayer's declarations, the acts will be controlled, and our conclusions regarding residency should be based on the facts and circumstances proved. The following factors should be reviewed in making a residency determination:

*Address used on federal income tax returns;

*Address used on telephone, utility and commercial documents;

- *Address used on real and personal property tax documents;
- *Location of Taxpayer. How often and for how long is Taxpayer present at the location at issue;
- *Location of immediate family, such as spouse and children;
- *Length of time in Arkansas of Taxpayer and immediate family;
- *Absence of factors in other states.

II. STANDARD OF REVIEW

Arkansas may be a fact-pleading jurisdiction. The case and controversy: the standing issue while the power of the Judicial review is not found expressly in the Constitution. The Court does not function as an advisory board. It only resolves disputes. Substantial factor a major consideration of the elements for requirements for a cause of action documentary rules of evidence and statutes that govern the admissibility of evidence. You can only be a full resident of one state. After Huckabee Sanders left the White House in June of 2019, she became a commentator for fox news. The legality of the quality or state of being in accordance with the law. Huckabee has committed an illegal action which violates the Antitrust laws-Sherman Act section 1 and the Clayton Act. According to 203Limitations Statutes Applicable to suits against the government; the statutes create a new legal liability, with the right to a suit for its enforcement, provided the suit is brought within twelve months, and not otherwise.

III. ARGUMENT

A. Sanders' Claim should not be dismissed for the facts that the State has violated the Constitution rules for qualifying Huckabee Sanders and Claimant Sanders should be granted the request relief.

Claimant Sanders, claim is valid, Huckabee Sanders has not spent more than six months in the State of Arkansas to be considered domiciled to be the Governor of Arkansas. First, Huckabee has not had a known permanent address for her parents left Arkansas in 2009, relocating to Florida at 756 Blue Mountain Rd, in Santa Rosa Beach according to the Arkansas Democrat-Gazette. What school was Huckabee Sanders children registered at for seven years while Sarah Huckabee traveled while in the political field? What job has Huckabee Sanders spouse held for seven years in the state of Arkansas? What is Huckabee Sanders permanent address for seven years that she paid utilities at? Why did Huckabee Sanders have to purchase a home instead of moving back to the home she claimed to have domiciled? According to 203 Limitations Statutes applicable to suits against the government, one has twelve months to bring a suit. As a known running candidate Claimant Sanders has the right to file a suit.

Second, the state has violated the claimant in the Judicial system to allow this illicit action. A suite will be filed in the federal Courts for Claimant has a civil right to do so as an entity of the United States and of Arkansas. Huckabee has lived across the country and her parents in Florida for about eleven years. Claimant has listed the violation of the State and Sarah Huckabee Sanders illicit acts. Sarah Huckabee Sanders was reported as a known liar when she was the press secretary according to public

reported records. At <https://mydmv.arkansas.gov> one must obtain an Arkansas driver's license and register your vehicle within 30 days of becoming a resident. It is illegal to possess two different state-issued driver's licenses at the same time. However, it is possible to carry diverse types of driver's licenses-if you are in the military, moved from overseas, or have an international driver's permit. A driver's license is permitted where one spends most of one's time. The claimant did state how the State violated the gubernatorial residency requirement with *Id.* Arkansas Constitution Article 6 section 5 which is the gubernatorial requirements.

Third, Claimant Sanders has grounds to file a claim to the Federal Court and the Supreme Court in Washington for the violation of the local government. Case and Controversy *Id.* The standing issue while the power of Judicial review is not found expressly in the Constitution, The Court does not act and an advisory board. It resolves disputes that will be entered into by the Federal Courts. Also, Sarah Huckabee Sanders must submit proof of residency to be considered domiciled for it is not clear of her residency before returning back to Arkansas and her Parents returning to Arkansas in 2020. Substantive laws- Laws that define our rights and obligations (202)514-2000 U.S. Department of Justice 203 Limitations statutes applicable to suites against the government. *Id.* 2-26 Ark. Code §51-102(9),(c). I stand corrected of Sarah Huckabee Sanders resign dated and returned date in 2019 instead of 2017. For she was a commentator for Fox news not in Arkansas. I require that the Court prove Huckabee Sanders was domicile in Arkansas for residency and requirements to hold the governor

seat in Arkansas is legitimate to the Constitution. Did Sarah Huckabee Sanders file her taxes in 2017-2019 in Washington or Arkansas? The claimant had to file with an agency and will file with federal courts jurisdiction also. Claimant filed with the Arkansas Commission to acknowledge the illegal act of the state actions to violate Arkansas Constitution and a removal will be filed with the proper Courts for jurisdiction of Huckabee Sanders removal for her illicit act to become the governor of Arkansas.

IV. CONCLUSION

For these reasons, the Commission should not dismiss Claimant Sanders' Claim as moot and for the state to prove Huckabee residency as domicile in Arkansas with her filed taxes, children school registration for seven years, personal paid taxes in Arkansas, and known domicile resident for seven years. At the very least, it should grant claimant's claim for relief of the States violation of the known illicit act. The claimant does not have to list what state Huckabee Sanders returned from giving Huckabee Sanders has been living in Washington in 2017-2019, New York, and Florida where her parents resided for eleven years or even Iowa. The State needs to prove domicile for seven years with taxes, residency, spouse job location, and children registered school. For when Sarah Huckabee Sanders returned to Arkansas she purchased a \$600,000 home in Little Rock, she did not return to a domicile residency.

Respectfully submitted,
Leticia Sanders
Leticia Sanders, pro se



Arkansas
State Claims Commission

DEC 15 2023

RECEIVED

CERTIFICATE OF SERVICE

I Leticia Sanders, hereby certify that a true and correct copy was delivered by
U.S. certified mail to respondent at address 323 Center Street, Suite 200 Little Rock, AR
72201 on or about this 15th day of December 2023.

Arkansas
State Claims Commission

MAR 27 2024

RECEIVED

BEFORE THE STATE CLAIMS COMMISSION
OF THE STATE OF ARKANSAS

LETICIA SANDERS

CLAIMANT

v.

CASE NO. CC-240613

STATE OF ARKANSAS

RESPONDENT


**CLAIMANT REPLY TO OPPOSE RESPONDENT'S RESPONSE TO
MOTION TO DISMISS & MOOT**

On December 15, 2023, Claimant Sanders responded to the Respondents response to dismiss the claim filed by claimant. The claimant did not file a new claim, but the claimant responded with a Motion to prove domicile before the claim may be dismissed. Claimant is entitled to request the proper documentation to prove the respondents claim for domicile of Sarah Huckabee Sanders. The claimant has a civil right as an entity in the state of Arkansas to make sure the laws, constitution, rules, and regulations are followed by every human in this state. It is not clear that Sarah Huckabee Sanders is within compliance with Arkansas Constitution Article 6 Section 5. According to *Id.* Rule 2.26-511102(9), (c) states that in situations where it is not clear if the requirements of either domicile(a) or place of abode(b) have been met, residency determination can only be made after thoroughly reviewing the facts on Sarah Huckabee Sanders property for domicile, children school, husband job, and where taxes has been paid. The Respondents want to say domicile with no provided proof in which Claimant has request with Motion to clear the violation of a problematic issue in question. Respondents note that claimant did not provide where Sarah Huckabee

Sanders return from which is not reasonable to dismiss, but reasonable to file a Motion for Respondents to make it clear with proof of domicile. The claimant made it known that Huckabee parents, has not been a resident for eleven years which make them ineligible for their resident to noted domicile. The claimant made it known that Huckabee parents move back in 2020. The claimant respectfully requests that the Commission grants the claimants Motion for Respondent to prove Huckabee -Sanders's domicile due to Huckabee Sanders' return purchasing a \$600,000 home in West Little Rock and no listed domicile property. The Claimant has satisfied the fact-forgoing pleading with the violation of Arkansas Constitution Article 6 Section 5 as the former gubernatorial candidate Huckabee Sanders has violated the Constitution until proven otherwise. The Respondents have a duty to prove domicile documentation and no exhibits attached to confirm domicile.

Respectfully Submitted,

Leticia Sanders



CERTIFICATE OF SERVICE

I Leticia Sanders, hereby certify that a true and correct copy will be delivered by U.S. mail to respondents at address 323 Center Street, Suite 200 Little Rock, AR 72201 on 29th day of December 2023, or after due to the holidays.