

**SETTLEMENT AGREEMENT**

The PLAINTIFFS, Daniel LaChance, Henry Conroy, Yvonne Mayer, and Robert McCormick, hereby agree to settle and resolve with finality the lawsuit pending in an Arizona Superior Court against the DEFENDANTS Cochise County, the Cochise County Jail District, the Cochise County Supervisors, the Cochise County Jail District Board Members, the Cochise County Recorder, and the Cochise County Elections Director, filed in June, 2023, arising from the Plaintiffs' challenge to the election of May 16, 2023 which created the Cochise County Jail District. The parties hereby agree to file jointly in Superior Court a voluntary motion to dismiss requesting dismissal of the case pursuant to settlement.

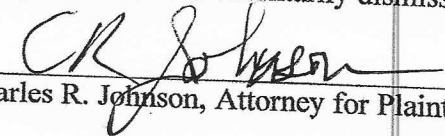
The parties agree that the May 16, 2023 jail district election was not lawfully executed by Cochise County, particularly as follows:

1. The Defendants agree, as found by the Arizona Court of Appeals, that more than 10,000 registered voters were disenfranchised by the failure to provide them a ballot. And those voters were not provided a method to cast their votes in person on election day.
2. The Plaintiffs contend that a super majority "yes" vote of 60% of those voting was required, but not achieved, to enact the jail district tax. Defendants do not take a position on that issue at this time, and expect the issue to be resolved by the courts.
3. The Defendants agree to stop collection of the tax until and unless a new election is held which remedies the foregoing shortcomings in the previous election, and which does not disenfranchise so-called "inactive voters."
4. The Plaintiffs agree that the 51% of yes votes in the May 16, 2023 satisfies the petition requirement for a new jail district tax election.
5. The Defendants agree to pay \$130,000 to Plaintiff Daniel LaChance within 30 days of the execution of this agreement to pay for and offset the costs of legal fees incurred in this matter.
6. The County will hold a new jail district election for the public to consider the jail district tax at an election that meets all legal requirements in November of 2025.
7. This Agreement is contingent upon approval of the joint motion to voluntarily dismiss.

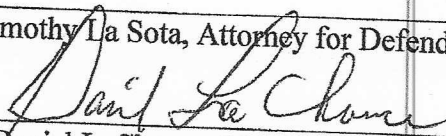
DATED this 24<sup>th</sup> day of March, 2025

DATED this \_\_\_\_\_ day of March, 2025

DATED this 24<sup>th</sup> day of March, 2025.

By   
Charles R. Johnson, Attorney for Plaintiffs

By \_\_\_\_\_  
Timothy La Sota, Attorney for Defendants

By   
Daniel LaChance, Plaintiff

DATED this 24<sup>th</sup> day of March, 2025

By Henry Steve Conroy by  
Henry Conroy, Plaintiff

DATED this 24<sup>th</sup> day of March, 2025

CR Johnson per his  
authorization

By Yvonne Mayer by  
Yvonne Mayer, Plaintiff

DATED this 24<sup>th</sup> day of March, 2025.

CR Johnson per her  
authorization  
By Robert J. McCormick  
Robert McCormick, Plaintiff

DATED this \_\_\_\_\_ day of March, 2025

Defendants:  
Cochise County,  
by its Board of Supervisors,  
and the Cochise County Jail District Board,  
by its Members:

By \_\_\_\_\_  
Frank Antenori

By \_\_\_\_\_  
Thomas Crosby

By \_\_\_\_\_  
Kathleen Gomez

DATED this \_\_\_\_\_ day of March, 2025

By \_\_\_\_\_  
Cochise County Recorder  
and Elections Director

DATED this \_\_\_\_ day of March, 2025

By \_\_\_\_\_  
Henry Conroy, Plaintiff

DATED this \_\_\_\_ day of March, 2025

By \_\_\_\_\_  
Yvonne Mayer, Plaintiff

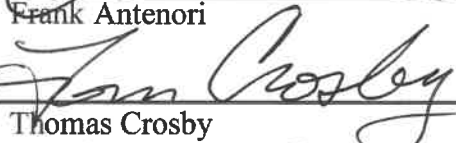
DATED this \_\_\_\_ day of March, 2025.

By \_\_\_\_\_  
Robert McCormick, Plaintiff

DATED this 27 day of March, 2025

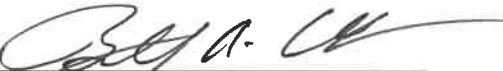
Defendants:  
Cochise County,  
by its Board of Supervisors,  
and the Cochise County Jail District Board,  
by its Members:

By   
Frank Antenori

By   
Thomas Crosby

By   
Kathleen Gomez

DATED this 27 day of March, 2025

By   
Cochise County Recorder  
and Elections Director  
Marisol Renteria