

**Iowa District Court  
Polk County, Iowa**

CARL OLSEN,	)	
	)	
Petitioner,	)	
	)	
vs.	)	
	)	Docket No. CV 51068
IOWA BOARD OF PHARMACY	)	
	)	
Respondent.	)	

**PETITION FOR JUDICIAL REVIEW**

Carl Olsen (“Petitioner” hereafter) respectfully petitions for judicial review of the following actions of the Iowa Board of Pharmacy (“Board” hereafter):

(1) the Board’s January 5, 2015, decision (attached hereto as Exhibit #1, at Addendum A) denying Petitioner’s July 7, 2014, Marijuana Scheduling Petition (attached hereto as Exhibit #2);

(2) the Board’s March 9, 2015, decision (attached hereto as Exhibit #3, at p. 2) denying Petitioner’s January 12, 2015, Marijuana Scheduling Petition for Reconsideration (attached hereto as Exhibit #4); and

(3) the Board’s November 3, 2015, decision (attached hereto as Exhibit #5) not to recommend the change it approved on January 5, 2015 (attached hereto as Exhibit #1, at Addendum B) for the reclassification of cannabidiol.

## **Introduction**

Marijuana is listed in Schedule 1 of the Iowa Uniform Controlled Substances Act (Iowa Code Chapter 124). Iowa Code § 124.204(4)(m). Schedule 1 of the Act is restricted to substances that have no “accepted medical use in treatment in the United States.” Iowa Code § 124.203(1)(b). See Ruling on Petition for Judicial Review, McMahon v. Iowa Board of Pharmacy, No. CV 7415, Polk County District Court (April 21, 2009), at page 4, footnote 1 (“A finding of accepted medical use for treatment in the United States alone would be sufficient to warrant recommendation for reclassification or removal pursuant to the language of Iowa Code section 124.203”) (attached hereto as Exhibit #6, at p. 4, n. 1).

At the time the Petitioner filed his request asking the Board to recommend the reclassification of marijuana, there were thirty-four (34) jurisdictions, twenty-

three (23) states<sup>1</sup> and the District of Columbia<sup>2</sup> that had legally recognized the medical use of marijuana in the United States, and another ten (10) states<sup>3</sup> that had accepted extracts of marijuana. Iowa is one of those ten (10) states that recognized extracts of marijuana.<sup>4</sup>

Between July 7, 2014, the time the Petitioner filed his request asking the Board to recommend the reclassification of marijuana, and the Board's November

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<sup>1</sup> Alaska Statutes § 17.37 (1998); Arizona Revised Statutes, Title 36, Chapter 28.1, §§ 36-2801 through 36-2819 (2010); California Health & Safety Code § 11362.5 (1996); Colorado Constitution Article XVIII, Section 14 (2000); Connecticut Public Act No. 12-55, Connecticut General Statutes, Chapter 420f (2012); Delaware Code, Title 16, Chapter 49A, §§ 4901A through 4926A (2011); Hawaii Revised Statutes § 329-121 (2000); Illinois Public Act 98-0122 (2013), 410 Ill. Comp. Stat. Ann. 130/1-130/199 (2014); 22 Maine Revised Statutes § 2383-B (1999); Annotated Code of Maryland Section 13-3301 through 13-3303 and 13-3307 through 13-3311 (2014); Massachusetts Chapter 369 of the Acts of 2012 (2012); Michigan Compiled Laws, Chapter 333, §§ 333.26421 through 333.26430 (2008); Minnesota SF 2470 -- Signed into law by Gov. Mark Dayton on May 29, 2014, Approved: By Senate 46-16, by House 89-40, Effective: May 30, 2014; Montana Code Annotated § 50-46-101 (2004); Nevada Constitution Article 4 § 38 - Nevada Revised Statutes Annotated § 453A.010 (2000); New Hampshire Revised Statutes Annotated Chapter 126-W (2013); New Jersey Public Laws 2009, Chapter 307, New Jersey Statutes, Chapter 24:6I, §§ 24:6I-1 through 24:6I-16 (2010); New Mexico Statutes Annotated § 30-31C-1 (2007); New York Pub. Health §§ 3360-3369-e (2014); Oregon Revised Statutes § 475.300 (1998); Rhode Island General Laws § 21-28.6-1 (2006); 18 Vermont Statutes Annotated § 4471 (2004); Revised Code Washington (ARCW) § 69.51A.005 (1998).

<sup>2</sup> D.C. Law 18-210; D.C. Official Code, Title 7, Chapter 16B, §§ 7-1671.01 through 7-1671.13 (2010).

<sup>3</sup> Alabama, Senate Bill 174, Signed into law by Governor Robert Bentley (Apr. 1, 2014); Florida, Senate Bill 1030, Signed into law by Governor Rick Scott (June 16, 2014); Iowa, Senate File 2360, Signed into law by Governor Terry Branstad (May 30, 2014); Kentucky, Senate Bill 124, Signed into law by Governor Steve Beshear (Apr. 10, 2014); Mississippi, House Bill 1231, Signed by Gov. Phil Bryant (Apr. 17, 2014); North Carolina, House Bill 1220, Signed by Gov. Pat McCrory (July 3, 2014); South Carolina, Senate Bill 1035, The bill became law because Governor Nikki Haley did not sign or veto the bill within five days of its passage (May 29, 2014); Tennessee, Senate Bill 2531, Signed into law by Gov. Bill Haslam (May 16, 2014); Utah, House Bill 105, Signed into law by Governor Gary Herbert (Mar. 21, 2014); Wisconsin, Assembly Bill 726, Signed by Governor Scott Walker (Apr. 16, 2014).

<sup>4</sup> Iowa, SF2360, May 30 2014, 2014 Iowa Acts Chapter 1125.

3, 2015, scheduling recommendations to the legislature for 2016,<sup>5</sup> an additional nine (9) jurisdictions had accepted some form of medical marijuana,<sup>6</sup> bringing the total to forty-two (42) jurisdictions in the United States that had accepted some form of medical marijuana as of November 3, 2015.

### **Background**

On July 21, 2009, the Board issued a proposal to hold public hearings on the question of marijuana's accepted medical use in the United States (attached as Exhibit #7). The proposal was reported in an editorial in the Des Moines Register on July 27, 2009 (attached as Exhibit #8). Hearings were held at the following times and locations (attached as Exhibit #9):

Wednesday, August 19, 2009 – 10:00 a.m. to 7:00 p.m.  
Iowa State Historical Building (Auditorium)  
600 East Locust Street  
Des Moines, Iowa

Wednesday, September 2, 2009 – 10:00 a.m. to 7:00 p.m.  
The Music Man Square (Reunion Hall)  
308 South Pennsylvania Avenue  
Mason City, Iowa

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<sup>5</sup> “Departments and agencies of state government shall, at least forty-five days prior to the convening of each session of the general assembly, submit copies to the legislative services agency of proposed legislative bills and joint resolutions which such departments desire to be considered by the general assembly.” Iowa Code § 2.16 (2015).

<sup>6</sup> Louisiana, SB143, June 29, 2015 (medical marijuana); Georgia, HB1, April 16, 2015 (marijuana extract); Missouri, HB2238, July 14, 2014 (marijuana extract); Oklahoma, HB2154, April 30, 2015 (marijuana extract); Texas, SB339, June 1, 2015 (marijuana extract); Virginia, HB1445, February 26, 2015 (marijuana extract); Wyoming, HB32, March 2, 2015 (marijuana extract); Guam, Proposal 14A, November 4, 2014 (medical marijuana); Puerto Rico, EO 2015-10, May 3, 2015 (medical marijuana).

Wednesday, October 7, 2009 – Noon to 7:00 p.m.  
University of Iowa  
Bowen Science Building (3rd Floor Auditorium)  
51 Newton Road  
Iowa City, Iowa

Wednesday, November 4, 2009 – 10:00 a.m. to 7:00 p.m.  
Harrah's Casino & Hotel (Ballroom I)  
One Harrah's Boulevard  
Council Bluffs, Iowa

Both written and oral testimony was received during the four months of hearings.

Each of the four hearings was transcribed by a certified court reporter, SueAnn Jones, CSR, RPR, Johnson Reporting Services, Ltd., Certified Shorthand Reporters, 913 27th Street, West Des Moines, Iowa 50265, (515) 224-1166.

On February 17, 2010, the Board reached the unanimous conclusion that marijuana should be removed from Schedule 1 (attached as Exhibit #10).

On November 24, 2010, the Board approved legislation recommending that marijuana be removed from Schedule 1 (attached as Exhibit #11).

The Board's November 24, 2010, legislative proposal was prepared by the Legislative Services Agency and submitted as a pre-filed agency bill<sup>7</sup> (attached as Exhibit #12).

Prior to the start of the 2011 session, the Legislative Services Agency also submitted the Office of Drug Control Policy ("ODCP" hereafter) scheduling

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<sup>7</sup> See footnote 5.

recommendation to maintain marijuana in Schedule 1 as a pre-filed agency bill<sup>8</sup> (attached as Exhibit #13).

And, prior to the start of the 2012 session, the Legislative Services Agency again submitted a pre-filed agency bill<sup>9</sup> by ODCP opposing the Board's bill and recommending that marijuana remain classified in Schedule 1 (attached as Exhibit #14).

### **Procedural History**

1. The Petitioner's Marijuana Scheduling Petition was filed with the Board on July 7, 2014 (see Exhibit #2).

2. The Board considered the Marijuana Scheduling Petition on August 27, 2014, and voted to form a subcommittee to make a report to the full Board at its next meeting on November 19, 2014 (attached as Exhibit #15, at p. 4).

Petitioner made an audio recording of the August 27, 2014 meeting (attached as Exhibit #16; the audio recording is available upon request). The Board distributed a newspaper article from the August 26, 2014, Des Moines Register, "Cannabis oil 'light years away' for Iowa families," at the meeting (attached as Exhibit #17).

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<sup>8</sup> See footnote 5.

<sup>9</sup> See footnote 5.

3. The subcommittee held a public hearing on November 17, 2014, and took written and oral statements (the written statements are attached as Exhibits #18 and #19).

4. On November 19, 2014, the subcommittee recommended granting the Marijuana Scheduling Petition (attached as Exhibit #20), but the recommendation was tabled indefinitely (see Exhibit #21, at p. 6) at the Board meeting. Petitioner made an audio recording of the November 19, 2014 meeting (attached as Exhibit #22; the audio recording is available upon request).

5. On December 1, 2014, the Petitioner submitted a written response to some of the arguments that were made at the Board meeting on November 19, 2014 (attached as Exhibit #23).

6. On December 8, 2014, the Petitioner submitted a Correction to Erroneous Interpretation of Law Petition to the Office of Drug Control Policy (attached as Exhibit #24) for erroneous statements it submitted to the Board on November 17, 2014, citing the Iowa District Court (see Exhibit #6) ruling that abuse potential is not a factor that requires marijuana to be maintained in Schedule 1 (Schedule 2 has the same abuse potential as Schedule 1).

7. On December 21, 2014, the Petitioner submitted a request to the Office of the State Ombudsman asking if the Office of Drug Control Policy is subject to the Iowa Administrative Procedures Act. On December 22, 2014, the

Office of the State Ombudsman said it could not answer the question (attached as Exhibit #25).

8. On December 26, 2014, the Petitioner submitted a Correction to Erroneous Interpretation of Law Petition for Reconsideration to the Office of Drug Control Policy after the Petitioner's Correction to Erroneous Interpretation of Law Petition was denied (attached as Exhibit #26).

9. On December 26, 2014, the Petitioner requested clarification from the Monitoring the Future Principle Investigator asking if the Office of Drug Control Policy had correctly interpreted his position on the scheduling of marijuana. On December 26, 2014, the Principle Investigator of the Monitoring the Future study replied that many of the state medical marijuana laws, but not the rescheduling of marijuana, promote drug abuse (attached as Exhibit #27).

10. On December 29, 2014, the Board notified the Petitioner that the recommendation of the subcommittee would be removed from the table and considered at the January 5, 2015, Board meeting (attached as Exhibit #28).

11. On January 1, 2015, the Petitioner notified the Board that Congress had temporarily suspended for one year the enforcement of federal Schedule 1



when state law provides for the medical use of marijuana (attached as Exhibit #29).<sup>10</sup>

12. On January 2, 2015, the Board's proposed changes to the schedules of controlled substances for 2015 was pre-filed<sup>11</sup> with the Iowa legislature (attached as Exhibit #30).

13. On January 5, 2015, the Board rejected the subcommittee's recommendation and denied the Marijuana Scheduling Petition (see Exhibit #1, at Addendum A). Petitioner made an audio recording of the January 5, 2015 meeting (attached as Exhibit #31; the audio recording is available upon request).

14. On January 12, 2015, the Petitioner filed a Marijuana Scheduling Petition for Reconsideration of the Board's ruling from January 5, 2015 (attached as Exhibit #32).

15. On March 2, 2015, the Petitioner submitted additional items for consideration by the Board for the Petitioner's Marijuana Scheduling Petition for Reconsideration of the Board's ruling from January 5, 2015 (attached as Exhibit #33).

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<sup>10</sup> There is a recent federal court ruling on Section 538 of the Consolidated and Further Continuing Appropriations Act of 2015, Pub. L. 113-235, 128 Stat. 2130 (2014) ("2015 Appropriations Act"), which has now been extended for another year. *United States v. Marin Alliance*, Case 3:98-cv-00086-CRB (Northern District of California, Document 277, Filed 10/19/15).

<sup>11</sup> See footnote 5.

16. At the March 9, 2015, meeting of the Board, the Petitioner submitted a written statement addressing the concerns the board had raised at the November 19, 2014, and January 5, 2015, meetings (attached as Exhibit #34).

17. At the March 9, 2015, meeting of the Board, the Board denied the Petitioner's Marijuana Scheduling Petition for Reconsideration without any discussion or written explanation (attached as Exhibit #35, at p. 2).

18. At the November 4, 2015, meeting of the Board, the Petitioner submitted a Request for Clarification of the Board's proposed changes to the schedules of controlled substances for 2016 because the recommendation the Board made to reschedule cannabidiol was not included in the proposed changes (attached as Exhibit #36).

19. On November 5, 2015, the Petitioner received an email from the Assistant Attorney General characterizing the Petitioner's November 4, 2015, Request for Clarification as a request for some kind of administrative action by the Board and said it was submitted too late (attached as Exhibit #37).

20. On November 15, 2015, the Petitioner filed an Open Records Request with the Board asking what was done to promote the Board's January 5, 2015, recommendation for the rescheduling of cannabidiol (attached as Exhibit #38)

21. On November 17, 2015, the Petitioner received a second email from the Assistant Attorney General saying she was confused about the nature of the Request for Clarification (attached as Exhibit #39).

22. On November 25, 2015, the Board responded to the Open Records Request with the documents requested by the Petitioner (attached as Exhibit #40). There are only two emails that were exchanged between the Board and legislators, so I've attached those as Exhibits #40-1 and #40-3. Neither of those emails were initiated by the Board. Exhibit #40-1 is an invitation dated January 16, 2015, to the Board from the chair of the Senate Judiciary Committee to attend a subcommittee meeting on SSB 1005 on January 20, 2015. Exhibit #40-2 is a cancellation notice of the January 20, 2015, Senate Judiciary Committee subcommittee meeting on SSB 1005. Exhibit #40-3 is a response from the Board dated April 7, 2015, responding to a request from the Republican Senate Caucus.

23. On December 29, 2015, the Board's proposed changes to the schedules of controlled substances for 2016 was pre-filed<sup>12</sup> with the Iowa legislature (attached as Exhibit #41).

### **Jurisdiction, Parties & Venue**

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<sup>12</sup> See footnote 5.

1. This is an action for judicial review as authorized by Iowa Code § 17A.19 which is part of the Iowa Administrative Procedures Act.
2. The name of the Petitioner is Carl Olsen.
3. Petitioner resides at 130 E. Aurora Ave., Des Moines, Iowa 50313-3654.
4. The Iowa Board of Pharmacy is the agency named as the Respondent in this action.
5. The Board maintains its principal headquarters in Polk County, Iowa.
6. Subject matter jurisdiction and venue of this matter properly lies in Polk County, Iowa by virtue of Iowa Code § 17A.19(2).
7. This is an appeal from final actions by the Board dated January 5, 2015 (see Exhibit #1), denying the Petition, March 9, 2015 (see Exhibit #3), denying the Petition for Reconsideration, and December 29, 2015 (see Exhibit #41), recommending changes to the schedules of controlled substances that do not include those requested by the Petitioner.
8. The action appealed from is the refusal of the Board to make a recommendation to the Iowa State General Assembly that marijuana be removed from Schedule I of the Act.
9. Petitioner has exhausted administrative remedies and this is an appeal from final action of the respondent agency.

### **Allegations**

10. On February 17, 2010, the Board made a unanimous ruling recommending that the Iowa legislature remove marijuana from Schedule 1 of the Iowa Uniform Controlled Substances Act (see Exhibits #7 through #12), supported by four months of research, written documentation, and oral testimony in 2009.

11. Since the Board's unanimous ruling on February 17, 2010, the Board has not found any evidence that would contradict the ruling it made in 2010.

12. In 2008, there were 12 states that had accepted the medical use of marijuana. Now, there are 40 states<sup>13</sup> and three federal jurisdictions that have accepted the medical use of marijuana. More than three times as many states have accepted marijuana's medical use as of 2015 than there were in 2008. Professional medical organizations have recently recommended that marijuana be removed from Schedule 1 (particularly, the American Academy of Neurology in December of 2014, and the American Academy of Pediatrics in January of 2015). The Board found absolutely zero evidence to the contrary.

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<sup>13</sup> Louisiana accepted the medical use of marijuana on June 29, 2015, HB 143.

13. The facts have not changed since the Board made its recommendation in 2010 and there are no facts in dispute in this case. The evidence has only gotten stronger.

14. There is no disagreement between the Petitioner and the Board that medical evidence warranting removal of marijuana from Schedule 1 has only gotten stronger.

15. The Petitioner agrees with the Board's decision in 2010 to recommend removing marijuana from Schedule 1.

16. There is nothing for this court to decide regarding the sufficiency of the evidence.

17. Iowa Code § 124.203(2) requires that, "If the board finds that any substance included in schedule I does not meet these criteria, the board shall recommend that the general assembly place the substance in a different schedule or remove the substance from the list of controlled substances, as appropriate."

18. Because the Board has not found any evidence to suggesting that marijuana should not be reclassified, the Board must recommend removal of marijuana from Schedule 1.

19. Doing nothing is not an option for the Board, unless material facts have changed that would prove its previous decision was in error.

20. Because material facts have not shown the Board was in error when it recommended removing marijuana from Schedule 1 in 2010, the Board must recommend the general assembly remove marijuana from Schedule 1.

21. Because marijuana no longer meets the criteria required by Schedule 1 of the Act the Board has a legal duty to recommend the general assembly remove marijuana from Schedule 1. Iowa Code § 124.203(2).

22. Because another executive branch agency, the Office of Drug Control Policy, which has no authority to recommend scheduling, has continually attempted to subvert the clear authority the legislature has given the Board of Pharmacy to recommend scheduling changes, the Board has a duty to defend its position against an unconstitutional attack from the same branch of government to which it belongs, the executive branch.

23. The ruling of the Board is:

Iowa Code § 17A.19(10)(a).

The decision of the Board is unconstitutional because it violates due process for the Board to ignore the statutory provisions of Iowa Code § 124.203(2) when a citizen brings it to their attention. The legislature has not given the Board the option of ignoring the scheduling criteria. The scheduling criteria exist to protect the public health.

Iowa Code § 17A.19(10)(b).

The decision of the Board exceeds the discretion given to the Board as a matter of law, because the Board has no authority to ignore the provisions of Iowa Code § 124.203(2).

Iowa Code § 17A.19(10)(c).

The decision of the Board is based upon an erroneous interpretation of the law whose interpretation has not clearly been vested by a provision of law in the discretion of the agency. The Board must recognize accepted medical use of marijuana in the United States when state laws show it has been accepted for medical use.

Iowa Code § 17A.19(10)(d).

The decision of the Board is based on faulty logic and errors in fact. The Board did not find that any facts that had changed that would have cast doubt on the validity of the unanimous decision it made in 2010 to recommend reclassification of marijuana. The Board's finding that opium plants are in Schedule 1 was a critical error and a finding that marijuana should be in the same schedule as opium plants should have resulted in a finding that marijuana should be removed from Schedule 1.

Iowa Code § 17A.19(10)(e).

The decision of the Board was based on improper interference from another executive branch agency, the Office of Drug Control Policy, in flagrant disregard for a district court order making it clear that abuse potential is not a relevant fact in moving a substance from Schedule 1 to Schedule 2. The Office of Drug Control Policy filed legislation opposing the Board in 2011 and 2012, and it incorrectly stated the positions of the Monitoring the Future study and the National Institute on Drug Abuse in 2014, neither of which as ever taken any position on scheduling. It is an unconstitutional violation of separation of powers for two executive branch agencies to oppose each other when one has been authorized by the legislature to make a specific decision (scheduling) and the other has not.

Iowa Code § 17A.19(10)(f).

The decision of the Board was based on an erroneous finding that opium plants are in Schedule 1. Opium plants are in Schedule 2 and always have been. Opium plants have never been in Schedule 1.

Iowa Code § 17A.19(10)(h).

The decision of the Board not to recommend the removal of marijuana from Schedule 1 is inconsistent with the Board's prior finding that marijuana should be removed from Schedule 1. The Board has not justified the inconsistency by stating credible reasons sufficient to indicate a fair and rational basis for the inconsistency.



Iowa Code § 17A.19(10)(i)

The decision of the Board is so illogical as to render it wholly irrational because opium plants are not in Schedule 1 and the Board said marijuana should be in the same schedule as opium plants which are in fact in Schedule 2 and not in Schedule 1. Other arguments that only products can be moved to lower schedules are also illogical as there are many substances in the lower schedules that are not products.

Iowa Code § 17A.19(10)(j).

The decision of the Board is a result of a decision-making process in which the agency did not accurately identify relevant and important matter relating to the propriety or desirability of the action in question that a rational decision maker in similar circumstances would have considered prior to taking that action. The Board incorrectly stated that opium plants are in Schedule 1 and marijuana belongs in the same classification as opium plants. Opium plants have always been in both state and federal Schedule 2 and marijuana is in Schedule 1. If marijuana belongs in the same classification as opium plants, then marijuana is clearly in the wrong schedule.

Iowa Code § 17A.19(10)(k).

The decision of the Board was not required by law and has a negative impact on public health so grossly disproportionate to the benefits accruing to the public interest that it must necessarily be deemed to lack any foundation in rational agency policy. The Board has no legal authority to withhold its advice from the legislature and the Board has a duty to protect the public interest by advising the legislature annually. The Board's arguments that the legislature must reclassify a substance before the Board can reclassify it is completely backward from the plain meaning of the statute. The Board's role is to advise the legislature, not to wait for advice from the legislature.

Iowa Code § 17A.19(10)(m).

The decision of the Board was based on an irrational, illogical, and wholly unjustifiable application of law to fact because the Board said it can only reclassify products and then recommended the reclassification of cannabidiol which is not a product. The Board said it had no idea what was in the various products covered by the Iowa Medical Cannabidiol Act and then recommended that cannabidiol be reclassified. Cannabidiol is not a product.

Iowa Code § 17A.19(10)(n).

The decision of the Board was an abuse of discretion because the Board made up its mind to deny the petition and then tried to come up with reasons for it. The reasons given were just opinions of various Board members that were not based in fact or law.

### **Prayer for Relief**

WHEREFORE, the Petitioner prays for:

- A. A judgment setting aside the January 5, 2015, ruling of the Iowa Board of Pharmacy denying the Marijuana Scheduling Petition; and
- B. A declaratory ruling from the court, establishing that, as a matter of law, marijuana has “accepted medical use in treatment in the United States”; and
- C. A writ of mandamus requiring the Iowa Board of Pharmacy to perform its duty to recommend removal of marijuana from Schedule I of the Iowa Controlled Substances Act, Iowa Code Chapter 124, according to requirements of Iowa Code § 124.203.

Respectfully Submitted:

/s/ Carl Olsen  
Carl Olsen, Pro Se  
130 E. Aurora Ave.  
Des Moines, IA 50313-3654  
515-343-9933

**Affidavit of Service**

**State of Iowa**     )  
                                  ) **SS:**  
**County of Polk**    )

I certify under penalty of perjury that on or before January 4, 2016, and in compliance with the notice requirements of Iowa Code Section 17A.19(2), I effected service of notice of this action by mailing copies of this petition to all parties of record in the underlying case before the Iowa Board of Pharmacy addressed to the parties or their attorney of record as follows:

Iowa Board of Pharmacy  
400 SW Eighth Street, Suite E  
Des Moines, Iowa 50309-4688

Meghan Gavin  
Assistant Iowa Attorney General  
1305 E. Walnut Street  
Des Moines, IA 50319

/s/ Carl Olsen  
Carl Olsen, Pro Se Petitioner