

**From the desk of:**

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**VIA ELECTRONIC MAIL:** [katie.mallery@state.sd.us](mailto:katie.mallery@state.sd.us)  
**& CERTIFIED MAIL**

Government Accountability Board  
c/o Katie Mallery  
2000 E. 52nd Street North  
Sioux Falls, SD 57104

**Re: *In the Matter of Government Accountability Complaint 2021-03***

Dear Members of the Government Accountability Board:

Enclosed please find the following:

1. Governor Noem's Motion to Dismiss and Response to Complaint 2021-03;
2. Governor's Exhibits 1-2; and
3. Governor Noem's Motion to Strike.

Pursuant to SDCL 3-24-4, we respectfully request that this letter as well as all information, reports, complaints, and investigative records and files remain confidential unless and until the Board votes to conduct a contested case hearing. Additionally, as explained in the Motion to Strike, Governor Noem further requests that certain records and information be stricken from the record and redacted regardless of whether this matter proceeds to a contested case hearing.

As the Board knows from the file before it, Complaint 2021-03 was filed by Jason Ravensborg in his official capacity as the Attorney General. As of April 12, 2022, Mr. Ravensborg has been suspended from his duties and taken a leave of absence following his impeachment by the South Dakota House of Representatives, and his suspension will continue until he is either removed from office or acquitted by the Senate.

It is our understanding that Chief Deputy Charles McGuigan has assumed the responsibilities of the Attorney General until the impeachment process is resolved. In order to preserve the confidentiality of these proceedings, we believe it is necessary to substitute Chief Deputy McGuigan for Mr. Ravensborg as the named complainant unless and until Mr. Ravensborg is restored to office.

If the Board requires additional information or documentation before issuing its decision, please do not hesitate to contact us.

On behalf of Governor Noem, we wish to thank the Board for its time and attention to this matter and the service it provides to the State of South Dakota.

Sincerely,

REDSTONE LAW FIRM LLP



Lisa M. Prostrollo

LMP/jmg  
Enclosures