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**Filed**

Supreme Court of Guam, Clerk of Court

Attorneys for The 38<sup>th</sup> Guam Legislature

## IN THE SUPREME COURT OF GUAM

**IN RE:**

) SUPREME COURT CASE NO.  
) CRQ26-001  
)

**REQUEST OF LOURDES A. LEON  
GUERRERO, I MAGA'HĀGAN  
GUĀHAN, RELATIVE TO ORGANIC  
ACT LIMITS ON LEGISLATIVE  
CONDITIONS AFFECTING THE  
GOVERNOR'S AUTHORITY TO  
ESTABLISH HOSPITALS**

**RESPONDENT COUNSEL'S  
RESPONSE TO ORDER TO SHOW  
CAUSE**

Respondent Counsel, pursuant to this Court's May 20, 2026 Order to Show Cause, respectfully submits this Response regarding citation inaccuracies and errors identified by the Court. In support of and incorporated as if fully set forth herein Counsel contemporaneously submits his Declaration in Support of Respondent Counsel's Response to Order to Show Cause.

### I. FACTUAL BACKGROUND

Petitioner filed a Request for Declaratory Judgment and then Emergency Motion for Expedited Briefing and Argument on March 4, 2026, granted by this Court. In addition to other filings, on May 1, 2026, Counsel prepared and submitted his seventy-four (74) page Opening Brief pursuant to the April 21, 2026 Clerk's Notice Re: Amended Briefing Schedule.

Counsel prepared for and presented oral arguments on all relevant issues, including those issues raised by Petitioner and questions presented by this Court.

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1  
2 Throughout this process, Counsel made a good faith effort to conduct thorough reviews  
3 of all content in Respondent's Briefs for accuracy. Counsel remained aware and in  
4 compliance with all legal and ethical standards, as Supreme Court of Guam  
5 Administrative Order No. ADM25-001 requires.

6  
7 Counsel's representation, including his experience with Organic Act challenges  
8 to local laws, reflected the reasonably necessary legal knowledge, skill, thoroughness  
9 and preparation required under the circumstances as required by the Guam Rules of  
10 Profession Conduct Rules 1.1 and 1.3. Counsel did not perform perfectly and this Court  
11 was correct to point out each error.

12 Counsel notes respectfully, the Order to Show Cause itself references "Supreme  
13 Court Case No. ADM25-001" as a case citation where the referenced authority intended  
14 is instead an administrative order adopting the Judiciary of Guam's Policy on Artificial  
15 Intelligence. Counsel raises this point not critically, but only to illustrate isolated citation  
16 inaccuracies may occur even within careful professional work product and do not reflect  
17 bad faith, intentional misrepresentation, or incompetence.

18  
19 Similarly, the Order to Show Cause states Counsel cited a "nonexistent page  
20 282" of *Nelson v. Ada*, referring to "Resp't's Br. at 3, 56, 57." Counsel cited to page 282  
21 two (2) times. See Respondent's Opening Brief at pages 3, 57 (May 1, 2026). Petitioner  
22 cited to page 282 three (3) times. See Petitioner's Reply Brief at page 20 (May 13,  
23 2026).

24 In addition, the Order to Show Cause states that Counsel mis-cited paragraph 28  
25 of *A.B. Won Pat Guam International Airport Authority v. Moylan*, referring to "Resp't's  
26 Br. at 2." However, Respondent's Brief cited paragraph 28 two (2) times, once on page  
27

1  
2 2 and once on page 61. See Respondent's Opening Brief at pages 2 and 61 (May 1,  
3 2026).

4 Counsel does not raise these points to assign fault, but to place the issue in  
5 proper context: the errors at issue were citation inaccuracies within otherwise existing  
6 authorities, not fabricated cases or intentional misrepresentations by any of us.

7  
8 Counsel did have two (2) separate members of his firm cite checking, and of the  
9 approximately one hundred forty-seven (147) citations provided, Counsel erred in at  
10 least six (6) such citations. Neither the quality control system in place nor opposing  
11 Counsel's mistakes excuse Counsel's individual responsibility to catch errors.  
12 Petitioner's Counsel was likely just as careful, though Petitioner's Brief contained three  
13 (3) mis-citations to the *Nelson v. Ada*, 878 F.2d 277 (9th Cir. 1989) case, and to a non-  
14 existent "last page". See Petitioner's Reply Brief at page 20 (May 13, 2026).

## 15 II. RESPONSE TO THE COURT'S IDENTIFIED CITATION CONCERNS

16 All citations this Court questions in its Order to Show Cause reference either the  
17 Organic Act of Guam, a Guam Supreme Court Opinion, or the *Nelson v. Ada* case.  
18 Petitioner cited *Nelson* before Respondent, an Organic Act case commenced in the  
19 District Court of Guam with a parallel case before the Superior Court of Guam reaching  
20 the same conclusion.

21  
22 Respondent's Opening Brief contained Westlaw's AI generated citations to  
23 known cases and suggested points from the same cases. Counsel used the Westlaw  
24 legal research tool to (a) identify and compile citations to relevant, previously decided  
25 cases and (b) generate draft argument themes based on those authorities. Counsel  
26 and two others independently reviewed, verified, and edited all citations and arguments  
27

1  
2 before use. Even with this review, the mistakes the Court pointed out got by and made  
3 it into Respondent's Opening Brief.

4 Counsel respectfully acknowledges the Court's identification of citation and  
5 quotation errors in its briefing and the Court's directive to show cause arising from those  
6 errors. The Order to Show Cause states the Legislature's brief contains several  
7 inaccuracies identified by the Court during its sua sponte review and following the  
8 bench statement at the May 19, 2026 oral argument. The Order to Show Cause further  
9 notes examples including: misattributing a statutory quotation as a holding; referencing  
10 subject matter unrelated to the cited point; mis-citing the last page of a case; quoting a  
11 portion of Counsel's argument; and misstating that the Governor appoints the Attorney  
12 General. The Court's Order also references the Judiciary of Guam's Policy on Artificial  
13 Intelligence, effective May 1, 2025, and emphasizes the responsibility to ensure the  
14 integrity and accuracy of submissions.  
15

16  
17 **A. Petitioner and Respondent mis-cited *Nelson v. Ada*, 878 F.2d 277 (9th Cir.  
18 1989) adding one (1) extra page**

19 Counsel referenced *Nelson v. Ada* in Respondent's Brief and mistakenly cited to  
20 page 282 at pages 3 and 57, when the correct cite is just 281. See Respondent's  
21 Opening Brief at pages 3 and 57 (May 1, 2026). The correct citation should not have  
22 included page "282" and should read, "*Nelson v. Ada*, 878 F.2d 277, 281 (9th Cir.  
23 1989)".

24 The incorrect page reference may have resulted from reliance on internal PDF  
25 pagination rather than official reporter pagination. The version reviewed by Counsel  
26 contained internal PDF pages numbered 1, 2, 3, 4 and 5. The relevant discussion  
27 appeared on PDF pages 4 and 5. This appears to have been converted into an incorrect  
28

1  
2 Federal Reporter, Second Series citation to page 282. While the page citation was  
3 wrong, the reference to *Nelson* and the legal proposition for which it was cited were  
4 accurate. Counsel did not detect this citation error.

5  
6 The likely absence of prejudice is shown by Petitioner's Reply Brief. Petitioner  
7 also cited *Nelson* three (3) times on page 20 using the same incorrect page range,  
8 "281–82." See Petitioner's Reply Brief at page 20 (May 13, 2026). Petitioner's reliance  
9 on the same citation infers Petitioner understood the authority being discussed and was  
10 not misled or prejudiced. Petitioner's Briefs also relied heavily on *Nelson* for essentially  
11 the same general proposition.

12 **B. This Court rejected the Attorney General's Separation of Powers challenge**  
13 **in *A.B. Won Pat Guam International Airport Authority v. Moylan*, 2005 Guam**  
14 **5 ¶ 27**

15 Counsel cited *A.B. Won Pat Guam International Airport Authority v. Moylan*, 2005  
16 Guam 5 approximately twenty-three (23) times in Respondent's May 1, 2026 Opening  
17 Brief. The Brief mistakenly cited paragraph 28 two (2) times, when the intended citation  
18 was paragraph 27. The intended proposition was, after reviewing the legislative and  
19 other history surrounding section 1421g of the Organic Act, the Supreme Court of Guam  
20 "reject[ed] the Attorney General's assertion that Congress intended that his office be  
21 immune from all legislative control." See *A.B. Won Pat Guam Int'l Airport Auth. v.*  
22 *Moylan*, 2005 Guam 5 ¶ 27. The error was an incorrect paragraph reference, not a  
23 fabricated case, fabricated holding, or intentional misstatement of law. This Court held:

24  
25 [27] Based on our review of the legislative and other history  
26 surrounding section 1421g of the Organic Act, which we  
27 discuss in detail below, we reject the Attorney General's  
assertion that Congress intended that his office be immune  
from all legislative control.

1  
2 See *A.B. Won Pat Guam International Airport Authority v. Moylan*, 2005 Guam 5 ¶ 27.

3 See also, *Id.* at ¶¶ 64 and 67.

4 **C. In *Barrett-Anderson v. Camacho*, 2018 Guam 20, this Court did not specify**  
5 **the need to preserve structural balance among coequal branches**

6 Counsel cited *Barrett-Anderson v. Camacho*, 2018 Guam 20 approximately three  
7 (3) times in his May 1, 2026 Opening Brief. General Barrett-Anderson had argued the  
8 trial court's Order violated the separation of powers. See *Barrett-Anderson v. Camacho*,  
9 2018 Guam 20 ¶ ¶ 1 and 29. This Court did not reach the separation of powers  
10 argument.

11 This Court specifically addressed flexibility. See *Barrett-Anderson v. Camacho*,  
12 2018 Guam 20 ¶ 24. The sections below represent this Court refrained from invalidating  
13 statutes and instead worked a solution wherein the Department of Revenue and  
14 Taxation would pay for the Department's own attorney.

15  
16 [30] This court takes separation of power challenges  
17 seriously, *Calvo v. I Mina' Trentai Kuåttro Na Liheslaturan*  
18 *Guåhan*, 2018 Guam 6 ¶¶ 9, 16, and has invalidated  
19 government actions on that basis, see, e.g., *In re Request*  
20 *of Gutierrez*, 2002 Guam 1 ¶ 45 (invalidating the  
21 legislature's attempt to set specific positions and salaries for  
22 all executive branch employees); *People v. Camacho*, 1  
23 Guam R. 501, 504-05, 511 (1975) (invalidating the judicial  
24 appointment of an independent special prosecutor as a  
25 judicial invasion of executive functions). However, where  
26 statutes can be construed to avoid conditional questions,  
27 this court will not answer the question of constitutionality or  
28 organicity. See *Camacho v. Estate of Gumataotao*, 2010  
Guam 1 ¶ 23; cf. *United States v. Rumely*, 345 U.S. 41, 48  
(1953) ("Grave constitutional questions are matters properly  
to be decided by this Court but only when they inescapably  
come before us for adjudication."). We do not need to  
answer the constitutional question alleged by the Attorney  
General, because the Guam Legislature enacted a statutory  
scheme that requires DRT to pay for its own counsel.

1  
2 [31] The operative statute, which was relied on by the  
3 Superior Court to order the Attorney General to pay for  
4 DRT's independent counsel, is 5 GCA § 30102. The statute  
5 requires the opposite result.

\* \* \*  
6 [32] While 5 GCA § 30102 allows DRT to request the  
7 services of the Attorney General and the Attorney General  
8 has cognizance over DRT's legal matters, DRT must  
9 reimburse the Office of the Attorney General for such  
10 services from funds of said agency. See 5 GCA § 30102.  
11 We interpret this to mean that DRT must pay for its attorney  
12 of choice when it decides not to, or for whatever reason  
13 cannot, use the services of the Principal Guam Territorial  
14 Income Tax Attorney or the Attorney General. We offer no  
15 opinion regarding who pays for legal services of agencies  
16 that lack permission to retain counsel other than the  
17 Attorney General. Today, it is sufficient to find that the  
18 Legislature provided that DRT must pay for its legal  
19 services in cases such as this. Therefore, the trial court  
20 erred in ordering the Attorney General to pay for DRT's  
21 independent counsel.

22 *Barrett-Anderson v. Camacho*, 2018 Guam 20 ¶¶ 30-32 (Emphasis added).

23 This Court has affirmed the democratic concept of "co-equal branches of  
24 government." *In re Leon Guerrero*, 2023 Guam 11, held in part, "Recognizing this  
25 narrow exception does not raise separation of powers problems, but rather respects the  
26 principle that the government of Guam is comprised of three separate but co-equal  
27 branches of government" at ¶ 24. Shortly thereafter, this Court again addressed a  
28 separation of powers argument stating, "But it is not the judiciary's place to invade the  
internal decision-making process of how an elected official runs his office." *In re Leon*  
*Guerrero*, 2024 Guam 18, ¶ 67 citing *Santos v. Calvo*, D.C. Civ. No. 80-0223A, 1982  
WL 30790, at \*4 (D. Guam Aug. 11, 1982); see also *Barrett-Anderson*, 2018 Guam 20  
¶¶ 29–30 (discussing Attorney General's argument that "trial court's order violates the

1  
2 separation of powers by invading 'an internal decision-making process of the executive  
3 branch").

4 **D. *Fleet Services, Inc. v. Department of Administration*, 2006 Guam 6, applied**  
5 **the Guam procurement law to executive procurement without any**  
6 **separation of powers concern**

7 This Court made clear in *Fleet Services, Inc. v. Department of Administration*:

8 [14] The Guam Procurement Law, Chapter 5 of Title 5 of the  
9 Guam Code Annotated, applies to procurement within the  
10 Executive Branch:

11 § 5125. Application of this Chapter to Executive  
12 Branch.

13 Every governmental body which is in the purview of  
14 the Executive Branch . . . shall be governed by Articles 1, 3,  
15 6, 7, 10, 11 and 12 of this Chapter . . . .

16 It is the intent of I Liheslaturan Guåhan [the  
17 Legislature] to require all Executive Branch governmental  
18 bodies . . . to be governed to the maximum extent  
19 practicable by Chapter 5 of Title 5 of the Guam Code  
20 Annotated. This provision requires any governmental body,  
21 and each above-named body, to conduct their procurement  
22 activities pursuant to Chapter 5 of Title 5 of the Guam Code  
23 Annotated . . . .

24 See *Fleet Services, Inc. v. Department of Administration*, 2006 Guam 6 ¶ 14.

25 In Respondent's Brief Counsel correctly asserts:

26 The Guam Supreme Court in *Fleet Services, Inc. v. Dep't of*  
27 *Admin., Gov't of Guam*, 2006 Guam 6 applied the Guam  
28 Procurement Law to Executive Branch procurement without  
any constitutional difficulty, treating it as an uncontroversial  
regulation of executive branch procurement activity. The  
case did not identify any encroachment on the Governor's  
Organic Act powers.

See Respondent's Opening Brief at page 39 (May 1, 2026).

Counsel cited *Fleet Services, Inc. v. Department of Administration*, 2006 Guam 6  
two (2) times in Respondent's May 1, 2026 Opening Brief. Had Counsel not included  
quotation marks in the one citation, his summary would have been understood as

1  
2 appropriate legal argument. The issue was not that Counsel relied on a non-existent  
3 statute or invented legal authority. Rather, the issue was Counsel used quotation marks  
4 where the language should have been presented as Counsel's characterization of the  
5 statute's legal effect. Pages later, on page 39, Counsel cited and discussed the same  
6 provision correctly, confirming that the mistake was one of drafting and formatting, not  
7 bad faith or intent to mislead. Respondent's Brief therefore reflects Counsel understood  
8 the relevant case, but mistakenly placed quotation marks around language that should  
9 have been presented as Counsel's legal argument. Counsel correctly presented his  
10 identical argument shortly thereafter.

11  
12 Counsel respectfully acknowledges and accepts responsibility for an inadvertent  
13 use of quotation marks around a portion of one (1) phrase in Respondent's Brief, which  
14 could be read to imply attribution to the Court instead of Counsel's argument. The  
15 quotation marks were a drafting error, not an attempt to attribute language to the Court  
16 or to mislead the Court. As represented above, Counsel later articulated a near exact  
17 substantive point without quotations marks, confirming the absence of any intent to  
18 mislead. The quotation-marked phrase appears on Respondent's Brief at page 27, and  
19 the same argument appears without quotation marks on Respondent's Brief at page 39.  
20 See Respondent's Opening Brief at pages 27 and 39 (May 1, 2026).

21  
22 **E. 48 U.S.C. § 1421g(d)(1) provides "the Attorney General of Guam shall be**  
23 **appointed by the Governor of Guam"**

24 Counsel cited 48 U.S.C. § 1421g(d)(1) three (3) times in his May 1, 2026  
25 Opening Brief. The Organic Act reads in relevant part:

26 (d)(1) The Attorney General of Guam. The Attorney General  
27 of Guam shall be the Chief Legal Officer of the Government  
28 of Guam. At such time as the Office of the Attorney General

1  
2 of Guam shall next become vacant, the Attorney General of  
3 Guam shall be appointed by the Governor of Guam with the  
4 advice and consent of the legislature, and shall serve at the  
5 pleasure of the Governor of Guam.

6 (2) Instead of an appointed Attorney General, the  
7 legislature may, by law, provide for the election of the  
8 Attorney General of Guam by the qualified voters of Guam in  
9 general elections after 1998 in which the Governor of Guam  
10 is elected. The term of an elected Attorney General shall be 4  
11 years. The Attorney General may be removed by the people  
12 of Guam according to the procedures specified in section  
13 1422d of this title or may be removed for cause in accordance  
14 with procedures established by the legislature in law. A  
15 vacancy in the office of an elected Attorney General shall be  
16 filled—

17 (A) by appointment by the Governor of Guam if such  
18 vacancy occurs less than 6 months before a general election  
19 for the Office of Attorney General of Guam; or

20 (B) by a special election held no sooner than 3  
21 months after such vacancy occurs and no later than 6 months  
22 before a general election for Attorney General of Guam, and  
23 by appointment by the Governor of Guam pending a special  
24 election under this subparagraph.

25 48 U.S.C. § 1421g(d)(1) (Emphasis added).

26 The correct citation would be 48 U.S.C. § 1421g(d)(2) instead of 48 U.S.C. §  
27 1421g(d)(1). Counsel primarily intended the citation to support the Attorney General's  
28 increased status. While the Organic Act still states at 48 U.S.C. § 1421g(d)(1), "the  
Attorney General of Guam shall be appointed by the Governor of Guam," 48 U.S.C. §  
1421g(d)(2) allows for the election of the Attorney General and the Legislature provides  
for this method of selection today. Counsel believes the error this Court illudes to is  
correct. Counsel's citation remains valid law, but the proposition is incorrect.

Counsel correctly used the same citation on page 42 of Respondent's Brief.  
"Since the 1998 amendments to the Organic Act, 48 U.S.C. § 1421g(d)(1) designates  
the Attorney General as the "Chief Legal Officer of the Government of Guam." See

1  
2 Respondent's Opening Brief at page 42 (May 1, 2026). Counsel again correctly used 48  
3 U.S.C. § 1421g(d)(1) while arguing the Attorney General was now insulated from the  
4 Governor's general supervision and control but still subject to legislative regulation. See  
5 Respondent's Opening Brief at page 42 (May 1, 2026).  
6

7 Counsel argued, "Section 5150's mandatory Attorney General involvement in  
8 procurement does not, under Guam Supreme Court precedent, prevent the Governor  
9 from accomplishing her public health functions." See Respondent's Opening Brief at  
10 page 33 (May 1, 2026). In support, Counsel cited to this Court's cases and holdings  
11 relating to the current position and authority of the Attorney General. See Respondent's  
12 Opening Brief at pages 33-35 (May 1, 2026).  
13

14 While the cases and holdings were correct, the reference to the former 48 U.S.C.  
15 § 1421g(d)(1) for the Attorney General's Organic Act standing was also correct but not  
16 as reference to appointment by the Governor.  
17

### 18 III. CONCLUSION

19 Counsel recognizes the seriousness of the Court's concerns and apologizes for  
20 the inaccuracies identified in Respondent's Opening Brief. For all matters involving  
21 representation of Counsel's client before this Court and even the District Court in related  
22 proceedings, Counsel performed with diligence, met all deadlines, was attentive to all  
23 arguments raised by Petitioner and on behalf of Respondent, and fully prepared for and  
24 presented oral arguments. Respondent Counsel fulfilled his ethical obligation to  
25 exercise the legal knowledge, skill, thoroughness, preparation, reasonable diligence,  
26 and promptness necessary to represent *I Mina' Trentai Ocho Na Liheslaturan Guåhan*  
27 (The 38<sup>th</sup> Guam Legislature) as required under GRCP Rule 1.1 and 1.3.  
28

1  
2 Counsel exercised the legal knowledge, skill, thoroughness, preparation,  
3 reasonable diligence, and promptness necessary to represent his client. Counsel did  
4 not mislead this Court or ever attempt to do so. Counsel did not violate the Judiciary's  
5 AI policy or the Guam Rules of Appellate Procedure 21.1(b).  
6

7 Respondent candidly recognizes, because briefing and oral argument have  
8 concluded, any correction may have limited practical utility to the Court or opposing  
9 counsel at this juncture. Nevertheless, in a good faith effort to assist the Court's record  
10 and to demonstrate accountability, Respondent Counsel is prepared to provide  
11 corrective materials, should the Court find them helpful:

- 12 1. Short errata identifying each inaccurate citation or quotation with precise  
13 corrections and pinpoint citations;
- 14 2. A corrected brief limited to conforming corrections, accompanied by a redline  
15 showing only those corrections;
- 16 3. A supplemental letter listing the corrections with page and paragraph references  
17 for quick cross-checking; and  
18
- 19 4. If preferred, delivery of a stand-alone compilation of corrected citations and  
20 quotations for the Court's convenience, keyed to the affected pages and lines of  
21 the existing brief.

22 Respondent Counsel does not seek leave to file any corrective document unless  
23 the Court wishes to receive one and defers entirely to the Court's preference as to form  
24 and timing. If the Court directs a particular format, Respondent will file the designated  
25 corrective submission by any deadline the Court sets, and will serve the same on  
26 opposing counsel.  
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1  
2 Respondent Counsel affirms there was no intent to mislead the Court or  
3 opposing counsel. Upon being alerted to the concerns at argument and through the  
4 Order to Show Cause, Respondent promptly undertook internal review and stands  
5 ready to remediate the record as described above. To prevent any recurrence,  
6 Respondent has implemented additional safeguards for future filings, including  
7 enhanced source verification, attorney certification of quotations and citations, and pre-  
8 filing checks consistent with the Judiciary's AI Policy and the Guam Rules of  
9 Professional Conduct. The Order to Show Cause underscores the Rules of Professional  
10 Conduct require competence and diligence and that users must thoroughly review any  
11 AI-generated content prior to submission.  
12

13 If the Court concludes corrective materials would not materially aid its  
14 deliberation at this stage, Respondent Counsel respectfully requests guidance as to  
15 whether the Court would instead prefer a concise post-judgment submission to ensure  
16 the docket accurately reflects the corrected citations and quotations solely for archival  
17 clarity.  
18

19 Respectfully submitted this 29<sup>th</sup> day of May, 2026.

20 **PHILLIPS & BORDALLO, P.C.**

21  
22 By:

  
23 **MICHAEL F. PHILLIPS**  
24 Attorney for Respondent  
25  
26  
27  
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2 could be read to imply attribution to the Court instead of Counsel's argument. The  
3 quotation marks were a drafting error, not an attempt to attribute language from *Fleet*  
4 *Services, Inc. v. Department of Administration*, 2006 Guam 6 to the Court or to mislead  
5 the Court.

6  
7 7. Respondent's Opening Brief contained Westlaw's AI generated citations to  
8 known cases and suggested points from the same cases. I used the Westlaw legal  
9 research tool to (a) identify and compile citations to relevant, previously decided cases  
10 and (b) generate draft argument themes based on those authorities.

11 8. Two others members of my firm and I independently reviewed, verified,  
12 and edited all citations and arguments before use. Even with this review, the mistakes  
13 the Court pointed out got by and made it into Respondent's Opening Brief.

14 9. I fulfilled my ethical obligation to exercise the legal knowledge, skill,  
15 thoroughness, preparation, reasonable diligence, and promptness necessary to  
16 represent The 38<sup>th</sup> Guam Legislature as required under GRCP Rule 1.1 and 1.3.

17 10. I did not violate or intend to violate the Judiciary's AI policy.

18 11. I did not violate or intend to violate the requirements of Guam Rules of  
19 Appellate Procedure 21.1(b).

20 12. I recognize the seriousness of the Court's concerns and apologize for the  
21 inaccuracies identified in Respondent's Brief.

22 13. I exercised the legal knowledge, skill, thoroughness, preparation,  
23 reasonable diligence, and promptness necessary to represent The 38<sup>th</sup> Guam  
24 Legislature. I did not mislead this Court or ever attempt to do so.

25 14. I candidly recognize, because briefing and oral argument have concluded,  
26

1  
2 any correction may have limited practical utility to the Court or opposing counsel at this  
3 juncture. Nevertheless, in a good faith effort to assist the Court's record and to  
4 demonstrate accountability, I am prepared to provide corrective materials, should the  
5 Court find them helpful:

6 (a) Short errata identifying each inaccurate citation or quotation with precise  
7 corrections and pinpoint citations;

8 (b) A corrected brief limited to conforming corrections, accompanied by a redline  
9 showing only those corrections;

10 (c) A supplemental letter listing the corrections with page and paragraph  
11 references for quick cross-checking; and

12 (d) If preferred, delivery of a stand-alone compilation of corrected citations and  
13 quotations for the Court's convenience, keyed to the affected pages and lines of  
14 the existing brief.  
15

16 15. I do not seek leave to file any corrective document unless the Court  
17 wishes to receive one and defers entirely to the Court's preference as to form and  
18 timing. If the Court directs a particular format, I will file the designated corrective  
19 submission by any deadline the Court sets, and will serve the same on opposing  
20 counsel.  
21

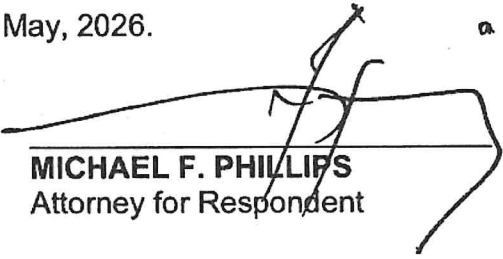
22 16. I affirm that there was no intent to mislead the Court or opposing counsel.

23 17. I have implemented additional safeguards for future filings, including  
24 enhanced source verification, attorney certification of quotations and citations, and pre-  
25 filing checks consistent with the Judiciary's AI Policy and the Guam Rules of  
26 Professional Conduct.  
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I declare under penalty of perjury under the laws of Guam that the foregoing is true and correct.

Respectfully submitted this 29<sup>th</sup> day of May, 2026.

By:   
**MICHAEL F. PHILLIPS**  
Attorney for Respondent