

# **Bond Case Briefs**

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## **REFERENDA - ARIZONA**

### **Arizona School Boards Association, Inc. v. State**

**Supreme Court of Arizona - January 6, 2022 - P.3d - 2022 WL 57291**

School board association and others brought action seeking declaration that sections of four legislative budget reconciliation bills violated constitutional title requirement or single subject rule.

The Superior Court ruled that challenged sections violated title requirement and that one bill violated single subject rule. State appealed, and appeal was transferred.

The Supreme Court held that:

- Plaintiffs had standing under Uniform Declaratory Judgments Act (DJA);
- Bill titles did not satisfy title requirement;
- One bill violated single subject rule;
- An act that violates the single subject rule is void in its entirety, abrogating *Clean Elections Institute, Inc. v. Brewer*, 209 Ariz. 241, 99 P.3d 570; and
- Holding that bill violated single subject rule would be applied retroactively.