HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

NICHOLAS POWER, Plaintiff, v. SAN JUAN COUNTY, a municipal subdivision of the State of Washington; MILENE HENLEY, San Juan County auditor in her personal capacity; JOHN and JANE DOES 1-99, unknown San Juan County officials, employees and agents, in their personal capacity, Defendants.	No. 2:18-cv-00811-MJP PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER Note for Motion Calendar: Friday, June 29, 2018[1] ORAL ARGUMENT REQUESTED

I. INTRODUCTION

Plaintiff, Nicholas Power, a candidate for San Juan County Prosecutor in the November 2018 election, hereby moves for a Temporary Restraining Order requiring San Juan County remove the County Auditor's opinion statement on its official website urging a "guideline" which unconstitutionally chills First Amendment protected political speech and favors incumbent candidates.

The parties have stipulated that San Juan County's Code ("SJCC") 18.40.400(c) (the "Ordinance"), which limits the use of political signage to 45 days before an

[1] By stipulation of the parties and as ordered by the Court. Dkt. 8, 10.

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election, is unconstitutional pursuant to longstanding United States Supreme Court precedent. Dkt. 8. However, there are remaining exigent issues in controversy.

Namely, Plaintiff asserts that San Juan County is impermissibly chilling First Amendment protected speech by publishing a statement on its website under the imprimatur of the County Auditor on County letterhead with disparaging value judgments regarding political speech. The Auditor, who oversees the election in an ostensibly neutral role, urges candidates in the upcoming election to comply with the unconstitutional Ordinance as a "guideline" and refrain from displaying any political signs more than 45 days prior to an election. The Supreme Court has held that temporal sign restrictions impermissibly favor incumbent candidates who are known to the electorate and suppress protected political speech.

The County's publication of a guideline which favors incumbents has the substantial capacity to chill the political speech of challengers and supporters, including the Plaintiff, and should be removed as violative of the First Amendment.

II. FACTS AND PROCEDURAL BACKGROUND

A. Factual History

1. Plaintiff is a candidate for political office in San Juan County against an entrenched incumbent.

On May 18, 2018 Plaintiff filed as a candidate to run for the office of San Juan County Prosecuting Attorney. Plaintiff is the sole challenger to five-time incumbent San Juan Prosecuting Attorney Randall Gaylord who has served as the County's elected prosecutor since 1994. Dkt. 1-1 at 3. Even though both candidates have declared preference for the Democratic Party, since the position is partisan, Mr. Power and Mr. Gaylord will be on the ballot for the primary election scheduled for August 7, 2018 and the general election on November 6, 2018.

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Mr. Power sought to and continues to seek to erect campaign signs on his property and on the property of citizens throughout San Juan County in order to publicize his candidacy and communicate issues to the electorate. *Id*. As a challenger to a long-time incumbent, Mr. Power has an acute need to overcome the name recognition which naturally accrued to Mr. Gaylord after being in office for 24 years.

2. San Juan County's political sign ordinance is held unconstitutional in Superior Court.

On May 21, 2018, Plaintiff brought suit in San Juan County Superior Court against a single defendant, San Juan County, alleging that San Juan County's political sign ordinance (SJCC 18.40.400(c) (enacted 1998)) was unconstitutional. Dkt. 1-1. Specifically, Plaintiff alleged that he and his supporters were prohibited from erecting such signs because of SJCC 18.40.400(C), which provides that:

> Political signs shall be permitted outright; provided, ***that they shall not be erected more than 45 days prior to an election*** and shall be removed by the candidate or landowner no more than 72 hours following an election terminating candidacy. Political signs shall not exceed six square feet in area."

Dkt. 1-1 at 3 – 4 (Emphasis added).

Plaintiff moved for a TRO on the ground that the temporal restraints in SJCC 18.40.400(c) were facially unconstitutional under both the Washington Constitution, see *Collier v. The City of Tacoma*, 121 Wn.2d 737 (1993), and the Constitution of the United States, *see City of Ladue v. Gilleo*, 512 U.S. 43 (1994). *See also George's County, Md.,* 33 F. Supp. 2d 447 (D. Md. 1999) (striking down a virtually identical 45 day limit on political signage).

On the same day the suit was filed, Superior Court Judge Kathryn Loring entered a TRO enjoining the enforcement of the Ordinance and scheduled a show cause hearing for June 1, 2018 on whether a preliminary injunction should be issued. Dkt. 2-5.

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3. San Juan County publishes a guideline urging compliance with the unconstitutional Ordinance.

On May 30, two days prior to the show cause hearing, San Juan County Auditor Milene Henley disseminated an "op-ed" press release and submitted it to local newspapers and blogs for publication using official San Juan County letterhead, email, and title as Auditor. Dkt. 2-11 at 12-13. Auditor Henley's "op-ed" piece was also posted by Defendant San Juan County on its primary homepage on May 30 and continues to be published on the County's homepage. Dkt. 2-16 at 17; Declaration of Nicholas Power ("Power dec."), Ex. A.[2]

Auditor Henley is responsible for administering and overseeing elections in San Juan County, as she notes in her "op-ed." Dkt. 2-16 at 18. In Auditor Henley's "op-ed" piece, Ms. Henley refers to political signs as "popping up like pesky dandelions across the country side." *Id*. She further refers to political signs as an "infection." *Id*. Moreover she states, "Political signs, according to San Juan County land use code are permitted so long they are put up not more than forty-five days before an election and taken down within three days after." *Id*. She further opined that in 1998 when the ordinance was adopted such temporal restrictions "seemed like a good idea," and that "Nobody wanted to see the landscape permanently blighted with signs, especially in a community such as ours, a place people come for the natural environment and rural appearance." *Id*.

Most chilling, however, is the Auditor's proposition that the unconstitutional ordinance should still serve as a "guideline" of the County. She writes:

> **As an administrator of elections**, I like yard signs because they remind people there is an election coming up. Not so much in some mainland locations, where signs go up eighteen months before an election. But San Juan County's law – **given recent events, let's just call it a "guideline"**

[2] The article is posted at https://sanjuanco.com/ (last accessed on June 20, 2018).

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> **– because it limits the duration of the signage**, effectively alerts people that it's almost time to vote."

Id. (Emphasis supplied).

In light of Auditor Henley's pronouncements "as an administrator of elections" that, although enjoined by Superior Court, the Ordinance should still be a guideline, Plaintiff filed an amended complaint and added Auditor Henley as a defendant, asserting a claim against her for violation of Plaintiff's First Amendment rights in publishing this statement chilling political speech and against San Juan County for publishing it.

B. Procedural History

1. San Juan County Superior Court issues a Preliminary Injunction enjoining the Ordinance.

On May 21, 2018, San Juan Superior Court Judge Loring granted a TRO temporarily enjoining the temporal aspect of the Ordinance. Dkt. 2-5 at 2-3. During the June 1, 2018 show cause hearing, Judge Loring entered a Preliminary Injunction similarly enjoining the enforcement of the temporal aspect of the Ordinance throughout the pendency of the proceedings. Dkt 2-14 at 2-4. During the June 1 hearing, Plaintiff orally moved for an order requiring the County to take down from its website Auditor Henley's recently published statement urging candidates to refrain from certain political speech. Dkt. 2-15 at 2-3. Judge Loring reserved ruling and ordered the parties brief the matter and continued the hearing until June 6, 2018.

2. San Juan County removes to United States District Court.

On June 4, 2018, before the continued hearing could be held in Superior Court, Defendants removed the case to this court on Federal Question grounds. On June 12, 2018, the San Juan County Council adopted a moratorium suspending the temporal restrictions of SJCC 18.40.400(c) so that a constitutionally compliant ordinance could

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be adopted. The parties have stipulated to the unconstitutionality of the temporal restriction of the Ordinance and narrowed the issues in controversy before this Court.

C. San Juan County's ongoing publication disparaging protected political speech is a ripe issue in controversy.

The parties were unable to reach a stipulation regarding removal of the statement posted on the primary homepage of San Juan County chilling the protected political speech of challengers and their supporters. The continued publication of the Auditor's statement instructs citizens on when it is appropriate to post political signs and disparages protected speech as "pesky", an "infection," and as a "blight." Dkt. 2-16 at 18. Plaintiff herein moves the Court for an order requiring the removal of statements by the County disparaging political speech or asserting that the unconstitutional temporal restriction on the Ordinance should be a guideline for candidates in the November election.

At the hearing held on June 1, 2018 Judge Loring twice stated in open court that she thought that the "op-ed" piece "undermined" the TRO that she had just ordered days before its publication. San Juan County residents have interpreted the article in the same way as Plaintiff and Judge Loring: to be a "policy statement" by County Auditor Milene Henley that "the time limit would remain the county's "guideline." Power dec., Ex. B.

The harm from this "op-ed," and the way it undermines the TRO meant to protect Plaintiff's clear constitutional rights, is palpable. Most importantly, evidence now exists that the publication of the "op-ed" piece has indeed acted to chill the speech of Mr. Power's supporters. The County's Paper of Record, The Journal of the San Juans, has run for seven consecutive days on its homepage a letter by a reader Meahgan Rader which states in its entirety:

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> I read Milene Henley's recent letter to the editor and fully agree that political signs, aka roadside spam, don't need to be up more than 45 days prior to an election.
>
> To expand the spam window serves no purpose and only increases the potential of the signs turning into litter. Posting signs outside of those guidelines will not help you earn our votes.

Ex. B to Power dec.[3]

Likewise, in another blog a commenter, who identified himself as Dan Christopherson, stated on June 7, 2018: "Nobody wants to see these campaign signs any longer than the time limit. It's visual pollution, like billboards." Ex. C to Power dec.[4]

The "op-ed" is effectively communicating that there is still some official standard in place and that candidates should not exercise their First Amendment rights. It is easy then to conclude that citizens would feel chilled in placing signs outside of the 45-day window as they would fear approbation from their neighbors and government.

Make no mistake, the County is communicating the message to the electorate that Mr. Power's candidacy is a pesky infestation against the entrenched power structure in the County. Plaintiff is challenging the five-term incumbent prosecuting attorney in San Juan County. As early as 2003, the incumbent Prosecutor recognized that the County's statute was unconstitutional – but yet it remained in effect through four more county prosecutor elections. *See* Dkt. 2-8 at 8, Dkt. 2-8 at 9-14. Auditor Henley was also aware that the Ordinance was unconstitutional before she published her statement; Auditor Henley was informed by Prosecutor Gaylord in August of 2017 that the County's sign ordinance was not enforceable because of its unconstitutional infirmity. Dkt. 2-8 at 21.

III. Argument and Authority

[3] Journal of the San Juans, available at: http://www.sanjuanjournal.com/letters/no-to-political-sign-extension-letter/, last visited June 19, 2018.

[4] Available at: "https://orcasissues.com/guest-opinion-does-this-really-need-to-be-a-federal-case/#comments, last visited June 19, 2018.

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A. Standard for Temporary Restraining Order

To obtain a TRO, a plaintiff must establish that (1) they are likely to suffer irreparable harm in the absence of the TRO; (2) they are likely to succeed on the merits; (3) the balance of equities tips in their favor; and (4) the issuance of the TRO is in the public interest. *Winter v. Natural Res. Def. Council, Inc*., 555 U.S. 7, 20 (2008) () (setting forth standard for preliminary injunction); *Lockheed Missile & Space Co., Inc. v. Hughes Aircraft Co.,* 887 F. Supp. 1320, 1323 (N.D. Cal. 1995) ("The standard for issuing a temporary restraining order is identical to the standard for issuing a preliminary injunction."). A stronger showing on one of these four elements may offset a weaker showing on another. *Alliance for the Wild Rockies v. Cottrell,* 632 F.3d 1127, 1131 (9th Cir. 2011). "`[S]erious questions going to the merits and a balance of hardships that tips sharply towards the plaintiff can support issuance of a preliminary injunction, so long as the plaintiff also shows that there is a likelihood of irreparable injury and that the injunction is in the public interest." *Id.* at 1135 (9th Cir. 2011).

Plaintiff can readily establish each of these four factors and his request for a TRO should be granted.

B. Plaintiff Has and Will Suffer Irreparable Harm

It is well established that a constitutional deprivation of free speech rights is an irreparable injury. “[T]he loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury." *Elrod v. Burns,* 427 U.S. 347, 373 (1976); *see also Jacobsen v. U.S. Postal Serv*., 812 F. 2d 1151 (9th Cir. 1987).

The Supreme Court has repeatedly held that the First Amendment “has its fullest and most urgent application [in] the conduct of campaigns for political office.” *Buckley v. Valeo*, 424 U.S. 1, 14-15 (1976)(citing *Monitor Patriot Co. v. Roy,* 401 U.S. 265, 272 (1971)). “In a republic where the people are sovereign, the ability of the citizenry to make informed choices among candidates for office is essential, for the

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identities of those who are elected will inevitably shape the course that we follow as a nation." *Buckley*, 424 U.S. at 14-15. This "requires us to err on the side of protecting political speech rather than suppressing it." *Fed. Election Comm'n v. Wis. Right to Life, Inc.,* 551 U.S. 449, 457 (2007).

Moreover, these rights are even more compelling in light of Plaintiff's important right to seek election to public office. The United States Supreme Court has repeatedly held that the individual's right to seek public office is inextricably intertwined with the public's fundamental right to vote, and may be limited only where necessary to achieve a compelling state purpose. *See Anderson v. Calebrezze*, 460 U.S. 780 (1983) (holding that an early filing requirement placed an unconstitutional burden on independent candidates and on the voting rights of his supporters); *Lubin v. Panish,* 415 U.S. 709 (1974) (holding that the state must provide alternative to fee requirement for indigent candidates); *Bullock v. Carter,* 405 U.S. 134 (1972) (invalidating fee requirement as unreasonable burden on candidates). *See also Mancuso v. Taft,* 476 F.2d 187 (1st Cir. 1973) (right to run for office is protected by First Amendment).

C. Plaintiff is Likely to Succeed on the Merits and the Remedy Sought is Appropriate and Necessary in the Public Interest.

Here, the continued publication of Auditor Henley's "op-ed" piece on the County's primary homepage severely acts to disadvantage Plaintiff and Plaintiff has a substantial likelihood of succeeding on the merits of his claim that this "op-ed" violated and continues to violate his First Amendment rights. As the Washington State Supreme Court said when it declared temporal restrictions of election signs unconstitutional:

> Although the Tacoma ordinances are viewpoint neutral, they define and regulate a specific subject matter — political speech. This content-based distinction, while viewpoint neutral, is particularly problematic because it inevitably favors certain groups of candidates over others. The incumbent, for example, has already acquired name familiarity and therefore benefits

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> greatly from Tacoma's restriction on political signs. **The underfunded challenger, on the other hand, who relies on the inexpensive yard sign to get his message before the public is at a disadvantage. We conclude therefore that while aesthetic interests are legitimate goals, they require careful scrutiny when weighed against free speech interests because their subjective nature creates a high risk of impermissible speech restrictions.**

Collier v. City of Tacoma, 121 Wn.2d 737, 751-752 (1993). (Emphasis added).

Equitable remedies for constitutional injuries are a longstanding and important part of not only the jurisprudence, but the history of this country. *See Brown v. Board of Education*, 347 U.S. 483 (1954). The Washington Supreme Court has held that such remedies are within the broad discretion of trial courts and that customized remedies are required. “When the equitable jurisdiction of the court is invoked ... whatever relief the facts warrant will be granted." *Kreger v. Hall,* 70 Wn.2d 1002, 1008, (1967).

Before Judge Loring, the County objected on the basis that ordering a take-down was a prior restraint. But this is not a prior restraint, because Auditor Henley has already made her statement. Plaintiff does not seek to compel the Auditor to make any statement of neutrality or otherwise; Plaintiff is simply seeking an order requiring the County not to chill political speech by advocating for, or stating the existence of, an unconstitutional guideline.

In any event, while prior restraints are presumptively unconstitutional, not all prior restraints are prohibited. Federal law has long recognized the validity of some prior restraints on constitutionally unprotected speech. *See Near v. Minnesota ex rel. Olson,* 283 U.S. 697, 716 (1931). *See also Seattle v. Bittner, supra* at 757 (some prior restraints on obscenity valid).

Equitable remedies are appropriate here. Victims of unconstitutional conduct may seek prospective relief against government officials acting in their official capacities to ameliorate other ongoing or imminent violations of individual constitutional rights. Even prior to the revivification of 42 U.S.C. § 1983 worked by *Monroe v. Pape*,

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365 U.S. 167 (1961), it was understood that actions for prospective relief against state officers to halt ongoing or imminent constitutional violations were available. *See Ex parte Young*, 209 U.S. 123 (1908); *General Oil Co. v. Crain*, 209 U.S. 211 (1908).

More recently in *Arizona Students' Association v. Arizona Board of Regents*, 824 F.3d 858 (2016), the Ninth Circuit expressly found that a plaintiff may bring a § 1983 claim invoking First Amendment rights to political speech that identifies "a practice, policy, or procedure that animates the constitutional violation at issue" and that in such an instance, equitable remedies – even prospective ones -- are appropriate:

> Although sovereign immunity bars money damages and other retrospective relief against a state or instrumentality of a state, it does not bar claims seeking prospective injunctive relief against state officials to remedy a state's ongoing violation of federal law. *Ex Parte Young,* 209 U.S. 123, 149-56…(1908); *see also Quern v. Jordan,* 440 U.S. 332, 337, …(1979); *Agua Caliente Band of Cahuilla Indians v. Hardin,* 223 F.3d 1041, 1045 (9th Cir. 2000). The *Young* doctrine allows individuals to pursue claims against a state for prospective equitable relief, including any measures ancillary to that relief. *Green v. Mansour,* 474 U.S. 64, 68-71, …(1985); *Hutto v. Finney,* 437 U.S. 678, 689-92…(1978) (allowing the recovery of attorney's fees and costs). To bring such a claim, the plaintiff must identify a practice, policy, or procedure that animates the constitutional violation at issue. *Hafer v. Melo,* 502 U.S. 21, 25…(1991); *Monell v. N.Y.C. Dep't of Soc. Servs.,* 436 U.S. 658, 690 & n. 55…(1978).

824 F.3d at 865. The Ninth Circuit went on to reverse the district court's dismissal:

> "[t]he district court erred when it failed to apply *Young* to ASA's claim of ongoing First Amendment retaliation, and its request for prospective injunctive and declaratory relief. As explained below, the ASA properly alleged a First Amendment retaliation claim, and it identified ABOR's changes to its fee-collection policies as the sources of ongoing violations of federal law within the meaning of *Young* and its progeny.

Id.

Importantly, the *Arizona Students' Association* Court specified what specifically

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was required to be pled to establish a First Amendment claim for "chilling". The Court said:

> **A plaintiff may bring a Section 1983 claim alleging that public officials, acting in their official capacity, took action with the intent to retaliate against, obstruct, or chill the plaintiff's First Amendment rights**. *Gibson v. United States,* 781 F.2d 1334, 1338 (9th Cir. 1986). To bring a First Amendment retaliation claim, the plaintiff must allege that (1) it engaged in constitutionally protected activity; (2) the defendant's actions would "chill a person of ordinary firmness" from continuing to engage in the protected activity; and (3) the protected activity was a substantial motivating factor in the defendant's conduct — i.e., that there was a nexus between the defendant's actions and an intent to chill speech. *O'Brien,* 818 F.3d at 933-34 (citing *Pinard v. Clatskanie Sch. Dist. 6J,* 467 F.3d 755, 770 (9th Cir. 2006); *Mendocino Envt'l Ctr. v. Mendocino County,* 192 F.3d 1283, 1300 (9th Cir. 1999)); *see also Blair v. Bethel Sch. Dist.,* 608 F.3d 540, 543 (9th Cir. 2010). **Further, to prevail on such a claim, a plaintiff need only show that the defendant "intended to interfere" with the plaintiff's First Amendment rights and that it suffered some injury as a result; the plaintiff is not required to demonstrate that its speech was actually suppressed or inhibited.** *Mendocino Envt'l Ctr.,* 192 F.3d at 1300.

Id. at 867 (emphasis added).

In *Arizona Students' Alliance*, the Court identified that, "the test for determining whether the alleged retaliatory conduct chills free speech is objective; it asks whether the retaliatory acts "`would lead ordinary student[s] ... in the plaintiffs' position' to refrain from protected speech." *O'Brien v. Welty,* 818 F.3d 920, 933-34 (9th Cir. 2016) (quoting, *Pinard v. Clatskanie Sch. Dist. 6J,* 467 F.3d 755, 770 (9th Cir. 2006). Further, the *Arizona Students' Alliance* Court observed:

> Otherwise lawful government action may nonetheless be unlawful if motivated by retaliation for having engaged in activity protected under the First Amendment. A state, division of the state, or state official may not retaliate against a person by depriving him of a valuable government benefit that that person previously enjoyed, conditioning receipt of a government benefit on a promise to limit speech, or refusing to grant a benefit on the basis of speech.

824 F.3d at 869 (internal citations omitted).

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Moreover, the Ninth Circuit has expressly found that motive may be established using direct or circumstantial evidence. In cases involving First Amendment retaliation in the employment context, the Ninth Circuit held that a plaintiff may rely on evidence of temporal proximity between the protected activity and alleged retaliatory conduct to demonstrate that the defendant's purported reasons for its conduct are pretextual or false. *Ulrich v. City & County of San Francisco,* 308 F.3d 968, 980 (9th Cir. 2002).

Here, the facts – which are almost wholly undisputed – demonstrate that:

1) the County was on notice that its Code provision that regulated political signs was unconstitutional;

2) the County knew that the Superior Court had ordered that the Ordinance was unconstitutional and could not be enforced against Plaintiff;

3) Plaintiff and Mr. Gaylord were adversaries in an on-going political campaign for the office of Prosecuting Attorney;

4) Mr. Gaylord is an incumbent candidate for 24 years, and Mr. Power is a challenger;

5) restrictive sign regulations or policies favor incumbents because of their already established name recognition;

6) Mr. Power has a constitutional right to participate in an election for which he is a qualified candidate;

7) Mr. Power is entitled pursuant to a “Free and Equal” election provided for Article 1, Section 19 of the Washington State Constitution; and

8) the “op-ed” piece came out just days after the Superior Court entered a TRO in this matter and expressed that Plaintiff was likely to prevail on the merits of is claim that the Ordinance was unconstitutional.

Here, the County was undeniably on notice that both its code provision and the Auditor’s statement that a “guideline” still existed violated Mr. Power’s constitutional rights. An equitable remedy is warranted given the County’s open advocacy for a guideline which suppresses protected political speech and which has resulted in

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confusion amongst the public as to what is legally permissible. The County's value judgments regarding good and bad political speech on the County Auditor's letterhead published on the County's website unconstitutionally chills protected speech.

D. Public Interest Favors Granting a TRO

Defendants cannot demonstrate a viable public interest in promoting an unconstitutional assertion of policy. To be clear, Plaintiff is not asking the Court to order an individual to be gagged with respect to a personal opinion about what kind of protected speech she likes and does not like. Indeed, undergirding this action is the position that citizens must be free to criticize and opine on the operation of their government, its laws and policies and be able to communicate their support or disapproval of candidates, officials, laws and policies. Accordingly, if the County Auditor has opinions about what political speech she likes and does not like, she may express those in her individual capacity. But such notions should not be suggested in her official capacity as County Auditor, and should not be posted on the County's official website in suggestion that the views are those of the County.

E. The Court should order only a nominal bond

Fed. R. of Civ. P 65 requires a Court to consider an appropriate security for movant to give. On May 21, 2018, Judge Loring required Plaintiff to post a cash bond of $1000 into the Court's registry. At the June 1, 2018 hearing, however, Judge Loring ordered the return of $999 dollars to Plaintiff and entered the temporary injunction. The County has no financial stake in suppressing political speech or issuing unconstitutional guidelines.

Plaintiff would request that this Court find that this $1 remains a sufficient security and that no further bond or security be posted.

IV. Relief Requested

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This Court should order Defendants to refrain from implying or otherwise communicating that the temporal aspects of former SJCC 18.40.400(c) is an official guideline or policy of Defendant San Juan County or its Auditor's Office.

This Court should further order Defendants to refrain from publishing or continuing to publish, state, advise or imply that the time limits embodied in former SJC 18.40.400(c) are effective, or that the County has any guideline or "official position" as to the temporal duration that political signs may be erected.

The Court should further order the County to remove Ms. Henley's statement from its County website, effective immediately.

DATED: June 22, 2018.

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CERTIFICATE OF SERVICE

I hereby certify that on this date I filed the foregoing document with the Clerk of the Court using the court's ECF filing system which will automatically serve the filing on the registered ECF users.

DATED June 22, 2018, at Seattle, Washington.

s/Cynthia Heidelberg
Cynthia Heidelberg

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