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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON**

JIN ZHU,

Plaintiff,

v.

NORTH CENTRAL
EDUCATIONAL SERVICE
DISTRICT – ESD 171,

Defendant.

NO. 2:15-cv-183-JLQ

PLAINTIFF’S MOTION
FOR PARTIAL SUMMARY
JUDGMENT

Hearing Date: July 8, 2016

Without oral argument

I. INTRODUCTION & SUMMARY OF ARGUMENT

A. *ESD 171 violated Washington’s Public Record Act.*

Washington’s legislature makes clear that “[t]he people of this state do not yield their sovereignty to the agencies that serve them.” RCW 42.56.030. To further that policy our state’s legislature passed the Public Records Act - - - a statute that is liberally construed so as to “assure that the public interest will be fully protected”

1 and to deny “public servants the right to decide what is good for the people to know
2 and what is not good for them to know.” *Id.*

3 On January 13, 2014, Jin Zhu made such a public record request to North
4 Central Educational Service District No. 171 (ESD 171) seeking:

5 [A] copy of North Central ESD’s programs (effective prior to June 21,
6 2012) that encouraged the school districts in North Central Washington
7 to employ minority teachers and/or that aimed to increase minority staff
8 in the NCESD.

9 Although ESD 171 knowingly possessed an affirmative action Board Policy
10 mandating that ESD 171’s superintendent “will ensure that administrative
11 procedures are developed which afford equal employment and promotion for women
12 and minorities” as well as detailed affirmative action Administrative Procedures,
13 ESD 171 did not produce those documents in response to Mr. Zhu’s public record
14 request because it “thought he wanted a program.” Instead ESD 171 told Mr. Zhu
15 that “Educational Service Districts are not required to have affirmative action
16 programs.” At no time did ESD 171 seek clarification from Mr. Zhu as to what he
17 meant by “programs”. Yet, Suzanne Reister, ESD 171’s Human Resources
18 Executive Director (the individual who responded to Mr. Zhu’s public record
19 request) was well aware that ESD 171 possessed affirmative action policies and
20 procedures. It was not until October 29, 2015 - - after Plaintiff filed this lawsuit and
21 received discovery responses from Defendant - - that Mr. Zhu learned of the ESD
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1 171 affirmative action policies and procedures that were unquestionably responsive
2 to his January 13, 2014 public record request. And it was not until Ms. Reister's
3 April 19, 2016 deposition when Plaintiff learned that the reason ESD 171 did not
4 give him the affirmative action policy and procedure (in 2014) was because ESD
5 171 was unclear about what Mr. Zhu meant by the word "programs." ESD 171's
6 after-the-fact claimed ignorance of the meaning of the word "programs" does get it
7 off the hook.
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9
10 As a matter of law ESD 171's (a) failure to seek clarification from Mr. Zhu as
11 to what he meant by "programs", (b) failure to explain the scope of its record search
12 to Mr. Zhu, and (c) failure to expand the scope of its search to beyond "programs"
13 violates the Public Record Act. The Washington State Supreme Court holds that an
14 agency is required to seek clarification from the requestor (here Mr. Zhu) if the
15 agency (as ESD 171 now admits) is unclear about the nature of the records being
16 requested yet admits that it never asked Mr. Zhu to clarify what he meant by
17 "programs." *Neighborhood All. of Spokane Cty. v. Cty. of Spokane*, 172 Wn.2d 702,
18 727 (2011)("The request sought public records...and if the agency was unclear about
19 what was requested, it was required to seek clarification.").

22 ***B. ESD 171 violated Washington's Law Against Discrimination.***

23 Washington's legislature states that practices of discrimination "threaten not
24 only the rights and proper privileges of its inhabitants but menace the institutions
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1 and foundation of a free democratic state” and guarantees the “right to obtain and
2 hold employment without discrimination.” RCW 49.60.010; RCW 49.60.030. To
3 that end, employer conduct that intentionally treats individuals differently on
4 account of their race *or* unintentionally disparately impacts those of a certain race
5 through a facially neutral employment practice are illegal. *E-Z Loader Boat Trailers,*
6 *Inc. v. Travelers Indem. Co.*, 106 Wn.2d 901, 909 (1986). ESD 171 maintains a
7 facially neutral “first come first served” hiring practice that disparately impacted Mr.
8 Zhu, a Chinese-American citizen.
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11 On April 4, 2013, Mr. Zhu applied for a Regional Science Refurbishment
12 Assistant position with ESD 171. Although Mr. Zhu was qualified for the position
13 and the only applicant (out of four) to submit a complete application for the position
14 he was not given that job (or allowed to interview for it) because of ESD 171’s
15 unwritten “first come first served” hiring practice. Instead, the job was given to Jesse
16 Swider, a white female, who applied for the job three days before Mr. Zhu but
17 undisputedly did not submit a complete application for the job. Accordingly, ESD
18 171’s “first come first served” hiring practice disparately impacted the employment
19 opportunity for qualified minority applicants. This is evident because Mr. Zhu was
20 the only Chinese-American applicant for the Refurbishment job and also the only
21 applicant who submitted a complete application for the job. As a result, ESD 171’s
22 hiring practice is illegal as a matter of law. Indeed, ESD 171 (a) admits that the
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1 practice limits the opportunities of all qualified applicants to compete for job
2 openings; (b) admits that alternatives exist to a “first come first served” practice; (c)
3 admits that the practice does not measure whether applicants for a job can actually
4 do the job; and (d) admits that the only time it used the “first come first served”
5 practice was when Mr. Zhu applied for the Refurbishment job. Accordingly,
6 summary judgment adjudication of Mr. Zhu’s disparate impact employment
7 discrimination claim under the Washington Law against Discrimination (WLAD) is
8 appropriate.
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11 Since there are no material issues of fact germane to either of these claims
12 summary judgment adjudication as to the issue of liability is appropriate.
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14 **II. ARGUMENT**

15 **A. MOTION FOR SUMMARY JUDGMENT STANDARD.**

16 Summary judgment is proper when “the pleadings. . . together with the
17 affidavits, if any, show that there is no genuine issue as to any material fact and that
18 the moving party is entitled to judgment as a matter of law.” Fed.R.Civ.P. 56(a);
19 *Celotex Corp. v. Catrett*, 477 U.S. 317, 322 (1986). An issue is “genuine” only if
20 there is a sufficient evidentiary basis on which a reasonable fact finder could find
21 for the nonmoving party and a dispute is “material” only if it could affect the
22 outcome of the suit under the governing law. *Anderson, v. Liberty Lobby, Inc.*, 477
23 U.S. 242, 248 (1986). Once the moving party has done so, the burden shifts to the
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1 opposing party to set forth specific facts showing there is a genuine issue for trial.
2 *In re Barboza*, 545 F.3d 702, 707 (9th Cir. 2008). Additionally, many PRA cases are
3 resolved on summary judgment regarding the adequacy of an agency's search and,
4 "[i]n such situations, the agency bears the burden, beyond material doubt, of
5 showing its search was adequate." *Neighborhood All.*, 172 Wn.2d at 721. Lastly,
6 courts have addressed WLAD disparate impact claims on summary judgment. *Fahn*
7 *v. Cowlitz Cty.*, 93 Wn.2d 368, 370 (1980).

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9 Since there are no material issues of fact as to Mr. Zhu's PRA and disparate
10 impact claims summary judgment adjudication is appropriate regarding liability.
11

12 **B. DEFENDANT VIOLATED WASHINGTON'S PUBLIC RECORD ACT BY NOT**
13 **SEEKING CLARIFICATION FROM MR. ZHU, BY NOT INFORMING MR. ZHU OF THE**
14 **SCOPE AND ADEQUACY OF ITS SEARCH, AND BY CONDUCTING AN INADEQUATE**
15 **SEARCH.**

16 ESD 171 silently withheld the records responsive to Mr. Zhu's public record
17 request. ESD 171 now seeks to justify its withholding by claiming it was confused
18 by the meaning of the word "program". But this after-the-fact excuse does not avoid
19 liability under the PRA. If ESD 171 was confused, it had to seek clarification from
20 Mr. Zhu as to what he meant by "programs" and to search widely giving a broad
21 construction in favor of disclosure to the request and, if that search revealed nothing,
22 tell Mr. Zhu where it searched. But ESD 171 chose the route prohibited by the PRA;
23 the agency chose to silently withhold the records until this litigation brought their
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1 withholding to light. The undisputed acts and decisions of ESD 171 violate the PRA
2 as a matter of law.

3 Washington's Public Record Act is a "strongly worded mandate for broad
4 disclosure of public records" standing for the proposition that complete access to
5 information concerning government conduct "must be assured as a fundamental and
6 necessary precondition to the sound governance of a free society." *Neighborhood*
7 *All.*, 172 Wn. 2d at 714-715. To that end, the PRA requires agencies "to disclose any
8 public record on request unless it falls within a specific, enumerated exemption" as
9 "virtually every document generated by an agency [is] available to the public unless
10 an exemption applies." *Id.* at 715, 719.¹

13 When confronted with a public record request a government agency must
14 make "an adequate search" that is "reasonably calculated to uncover all relevant
15 documents." *Id.* at 719-720. An agency "cannot limit its search to only one record
16 system if there are others that are likely to turn up the information requested." *Id.* at
17 722. An "adequate response to the initial PRA request where records are not
18 disclosed should explain" both the places searched *and* the adequacy of the search
19 as the "Public Records Act clearly and emphatically prohibits silent withholding by
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23 ¹ ESD 171 has not raised a PRA exemption defense (or any defense) to Mr. Zhu's
24 PRA claim. (ECF No. 22, pg. 15)
25

1 agencies of records relevant to a public records request.” *Id.* at 722-724. Lastly, when
2 an agency is unclear as to what is requested that agency is “required to seek
3 clarification” from the requester. *Id.* at 727.

4 Undisputedly, Mr. Zhu made a public record request on January 13, 2014
5 seeking records regarding ESD 171’s programs that encourage the employment of
6 minorities. (SOF ¶¶ 65 – 66) Undisputedly, ESD 171 received Mr. Zhu’s January
7 13, 2014 request, read the request and, on February 27, 2014 informed Mr. Zhu that
8 “[t]here are no records responsive to your request.” (SOF ¶¶ 65-69, 71-72)
9 Undisputedly, the only communication surrounding Mr. Zhu’s January 13, 2014
10 public record request is his January 13, 2014 letter, ESD 171’s January 22, 2014
11 letter seeking an extension, and ESD 171’s February 27, 2014 letter. (SOF ¶¶ 65, 69,
12 71) Undisputedly, ESD 171’s February 27, 2014 response to Mr. Zhu’s Public
13 Record Request does not, although required under *Neighborhood Alliance*, explain
14 the locations searched and adequacy of the search it made for the records Mr. Zhu
15 requested. (SOF ¶¶71-72) In fact, at her April 19, 2016, deposition, Ms. Reister still
16 refused to describe the process that ESD 171 went through in determining that no
17 records were responsive to Mr. Zhu’s January 13, 2014 public record request even
18 though *Neighborhood Alliance* mandated that ESD 171 should have informed Mr.
19 Zhu about the places it searched when it gave Mr. Zhu its final response to the public
20 record request on February 27, 2014. *See Neighborhood Alliance*, at 722-724. (SOF
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1 ¶ 78) And, undisputedly, ESD 171 never sought clarification from Mr. Zhu as to
2 what he meant by “programs” even though ESD 171 was “confused” by Mr. Zhu’s
3 use of the word “programs” and *Neighborhood Alliance* required ESD 171 to seek
4 such a clarification. (SOF ¶¶ 75-76) For it was not until Mr. Zhu filed this lawsuit
5 and deposed Ms. Reister (the person who responded to Mr. Zhu’s January 13, 2014
6 public record request) that Mr. Zhu learned that ESD 171 was “confused” by his
7 request. (SOF ¶75)

8
9 ESD 171’s search for documents responsive to Mr. Zhu’s January 13, 2014,
10 public record request was also inadequate. Ms. Reister knew what the phrase “public
11 record” meant, knew that Mr. Zhu’s January 13, 2014 request was one for public
12 records, acknowledged that ESD 171 possessed written documents relating to
13 employment of minorities at ESD 171, knew that ESD 171 possessed affirmative
14 action policies and procedures, personally accessed those documents numerous
15 times, and knew where those documents were physically located. (SOF ¶¶ 81 – 84)
16 Ms. Reister had extensive ongoing training regarding the Public Record Act. (SOF
17 ¶84) Yet, it was not until Mr. Zhu filed this lawsuit and propounded Request for
18 Production No. 14 to ESD 171 that ESD 171’s affirmative action policies and
19 procedures were produced. (SOF ¶ 87; ECF No. 017-1, pg. 6, 9, 15-18 *citing* Plaintiff
20 Request for Production No. 14)

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22 The inadequacy of ESD 171’s search in response to Mr. Zhu’s January 13,
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1 2014, public record request is further illustrated by ESD 171's conduct in this
2 lawsuit. For the same ESD 171 employee (Ms. Reister) who professed confusion
3 about Mr. Zhu's use of the word "programs" in the January 13, 2014 request was the
4 same ESD 171 employee who produced the agency's affirmative action policy and
5 procedure in response to Plaintiff Request for Production No. 14² even though
6 neither RFP 14 (and the January 13, 2014 request) used the words "affirmative
7 action." (SOF ¶87) Unquestionably, Ms. Reister had the training, wherewithal, and
8 ability to locate the affirmative action documents in 2014 yet chose not to do so.
9

10
11 Although not material to the liability aspect of this motion (but highly relevant
12 to the issue of damages), the reason why ESD 171 silently withheld its affirmative
13 action policies and procedures from Mr. Zhu in 2014 (all while misleadingly telling
14 Ms. Zhu that such agencies were "not required to have affirmative action
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² RFP No. 14 sought each "policy, practice or procedure that relates to or is
23 associated with discrimination, equal opportunity and/or retaliation that was in effect
24 during January 1st, 2012 to May 1st, 2013." (ECF No. 017-1, pg. 9)
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1 programs”³) was because ESD 171 has *never* complied with *any* of the salient parts
2 of those affirmative action policies or procedures and did not want to alert Mr. Zhu,
3 a qualified minority applicant who unsuccessfully sought employment with ESD
4 171, to the existence of such policies. (SOF ¶¶72, 88-94)

5
6 Accordingly, as a matter of law summary judgment adjudication of Mr. Zhu’s
7 Public Record Act claim is appropriate as to the issue of liability.

8 **C. DEFENDANT’S “FIRST COME FIRST SERVED” HIRING PRACTICE**
9 **DISPARATELY IMPACTS QUALIFIED MINORITY APPLICANTS.**

10 A plaintiff alleging a WLAD disparate impact claim must establish “that (1)
11 a facially neutral employment practice (2) falls more harshly on a protected class.”
12 *Kumar v. Gate Gourmet Inc.*, 180 Wn.2d 481, 503 (2014). WPI 330.02 & WPI
13 330.03. When “the plaintiff establishes the prima facie case, the burden shifts to the
14 defendant to show that the challenged requirement has a ‘manifest relationship’ to
15 the position in question.” *Shannon v. Pay 'N Save Corp.*, 104 Wn.2d 722, 727 (1985)
16 *abrogated on other grounds by Blair v. Wash. State Univ.*, 108 Wn.2d 558 (1987).
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21 ³ An agency’s dishonesty in responding to a public record request is an aggravating
22 factor in determining PRA damages. *See Zink v. City of Mesa*, 162 Wn. App. 688,
23 703 (2011).

1 If the employer meets this burden, “the plaintiff may still prevail by showing that
2 other less discriminatory alternatives can equally serve the employer’s legitimate
3 business requirements.” *Id.*

4 Washington courts look to federal court decisions when interpreting the
5 WLAD. *Grimwood v. Univ. of Puget Sound, Inc.*, 110 Wn.2d 355, 361 (1988). To
6 that end, federal disparate impact cases hold that a party seeking to establish
7 disparate impact discrimination “need only demonstrate the lack of objective criteria
8 and a disparity in job promotions.” *Hung Ping Wang v. Hoffman*, 694 F.2d 1146,
9 1148 (9th Cir. 1982). Upon meeting that burden the defendant must either (a) prove
10 “that the plaintiff’s statistics are inaccurate and no disparity exists;” or, (b) “that the
11 practice is necessary to the efficient operation of the business.” *Id.* (citations
12 omitted). Further, a plaintiff seeking to establish a disparate impact claim need not
13 prove “he would have been the most qualified individual⁴ for the jobs nor must he
14 prove discriminatory intent on the part of the” defendant. *Id.* (citations omitted).

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18 ***1. Plaintiff meets his WLAD disparate impact burden of proof.***

19 Regarding WLAD disparate impact element (1), the facially neutral
20 employment practice at issue in this case is ESD 171’s “first come first served”
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23 _____
24 ⁴ Although it is not Mr. Zhu’s burden, ESD 171’s records show that Mr. Zhu and
25 Ms. Swider were equally qualified for the Refurbishment job. (SOF ¶ 37)

1 hiring practice as it relates to applicants for temporary employment with ESD 171.
2 (SOF ¶¶ 38, 40) ESD 171’s “first come first served” practice allows the first person
3 who submits an application for a job opening to go through the entire position
4 selection process regardless of whether that person submitted a complete
5 application. (SOF ¶56) ESD 171’s “first come first served” practice further favors
6 individuals who previously worked at ESD 171. (SOF ¶¶57-58, 61)
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8 Regarding WLAD disparate impact element (2), the “first come first served”
9 practice’s effect falling on minorities (here Mr. Zhu the Chinese- American applicant
10 for the Regional Science Refurbishment Assistant position) is established as follows.
11 First, four individuals applied for the 2013 Regional Science Refurbishment
12 Assistant position: Mr. Zhu (Chinese) and three other (white) applicants. (SOF ¶¶13,
13 19, 21, 23, 25, 28) Although Mr. Zhu was the only applicant (of the four) who
14 submitted a complete application that included his cover letter, resume, and letters
15 of recommendation he was not selected for the job nor given the opportunity to go
16 through the selection process ESD 171 afforded Ms. Swider (the successful
17 candidate). (SOF ¶¶ 20, 22, 24, 28, 38) Second, ESD 171’s “ethnicity report” (which
18 includes Swider and Celeste Beatty – the white female who replaced Mr. Zhu after
19 Swider quit the Refurbishment job) reflects that nearly 92% of ESD 171’s employees
20 who identified themselves by their race, are white and none are Chinese. (SOF ¶¶
21 63, 64) Third, the only time ESD 171 has ever used the “first come first served”
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1 practice is when Mr. Zhu applied for the Regional Science Refurbishment position.
2 (SOF ¶51) Unquestionably, application of the “first come first served” policy vis-à-
3 vis the Refurbishment job resulted in Mr. Zhu, a minority, not getting the opportunity
4 to fully compete for that job.

5
6 ***2. Defendant cannot meet its WLAD disparate impact burden of proof.***

7 Having proved a prima facie disparate impact claim the burden shifts to ESD
8 171 to prove (a) that plaintiff’s statistics are inaccurate and no disparity exists; (b)
9 that the “first come first served” practice is necessary to the efficient operation of its
10 business; and (c) the “first come first served” practice is a professionally accepted
11 means that measures the ability to perform the fundamental requirements of the job.
12

13 *Hung Ping Wang*, 694 F.2d at 1148; WPI 330.03.

14
15 ESD 171 cannot claim that Mr. Zhu’s statistics are inaccurate because ESD
16 171 produced the documents upon which Mr. Zhu bases his claim. (SOF ¶¶63-64)
17 Further, ESD 171 cannot establish that no disparity exists as Mr. Zhu was the sole
18 Chinese applicant for the Regional Science Refurbishment Assistant position but did
19 not get the job (or opportunity to compete for the job by going through the same
20 process afforded the successful white candidate). Nor can ESD 171 claim that
21 “workload”, “someone need[ing] to go on emergency leave, someone [getting]
22 injured overnight in a car accident, [or] someone giving birth today” justify use of
23 the “first come first served” practice. (SOF ¶ 43) Because the Regional Science
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1 Refurbishment Assistant position opened on March 28, 2013, and Ms. Swider was
2 not hired until after April 16, 2013, and also was not paid for her work on the
3 Regional Science Refurbishment Assistant position until sometime after May 31,
4 2013, ESD 171 cannot credibly justify the “first come first serve” application
5 because of “workload” or “emergency” reasons. (SOF ¶¶ 13, 33, 35) Additionally,
6 ESD 171 admits (a) that the “first come first served” practice fails to measure
7 whether all applicants for the job are able to do the job; (b) that it has done no
8 research to determine whether the “first come first served” practice complies with
9 equal opportunity; (c) that it is aware of no other organization that uses a “first come
10 first served” practice; and (d) that the “first come first served” practice is not a
11 professionally accepted practice vis-à-vis hiring permanent employees. (SOF ¶¶44,
12 45, 46, 48)

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16 **3. *Even if Defendant meets its burden of proof Plaintiff still prevails because***
17 ***ESD 171 admits that alternatives to the “first come first served” practice***
18 ***exist.***

19 Assuming *arguendo* that ESD 171 can establish its “workload” or
20 “emergency” is needed for the “efficient operation” of the entity, Mr. Zhu still
21 prevails because he can prove “other less discriminatory alternatives can equally
22 serve the employer’s legitimate business requirements.” *Shannon*, 104 Wn. 2d at
23 727; WPI 330.03. Here ESD 171 admits that at least two alternatives exist to the
24 “first come first served” practice, including the alternative of allowing more than
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1 one applicant to go through the entire position selection process. (SOF ¶ 47)
2 Allowing the alternative of more than one applicant going through the entire hiring
3 process would “not have as harsh an impact” on minority applicants especially
4 given:

- 5
6 • ESD 171’s admission that the “first come first served” practice
7 might limit the opportunities of other qualified applicants to get
8 the job. (SOF ¶41)
- 9
10 • ESD 171 has no written policy that sets out the criteria by which
11 some qualified candidates may compete for job openings. (SOF
12 ¶50, 55)
- 13
14 • ESD 171 would not substantively answer the question of
15 whether allowing an individual who does not submit a complete
16 job application (as allowed under the “first come first served”
17 practice given Swider’s hiring) comports with its own EEO
18 policy. (SOF ¶52)
- 19
20 • ESD 171 would prefer a candidate who submitted an incomplete
21 application over a candidate who submitted a complete
22 application if the “background” of the applicant (here Mr. Zhu)
23 who did submit a complete application “wasn’t satisfactory.”
24 (SOF ¶53) Indeed, “[u]se of subjective job criteria has, in
25 many instances, a disparate impact on minorities.” *Nanty v.*
Barrows Co., 660 F.2d 1327, 1334 (9th Cir. 1981) *overruled on*
other grounds by O’Day v. McDonnell Douglas Helicopter Co.,
79 F.3d 756 (9th Cir. 1996).
- ESD 171’s unwritten practice allows former ESD 171
employees preferential treatment (i.e. Swider and Beatty) but
fails to maintain any mechanism that controls its unwritten
preferential practice. (SOF ¶57)

1 ESD 171 represents itself as an “equal opportunity employer”, but its “first
2 come first served” hiring practice does not give applicants an equal opportunity to
3 compete for job openings and had an adverse impact on Mr. Zhu, a qualified Chinese
4 applicant who, unlike the white candidate who got the job, actually submitted a
5 complete job application. Summary judgment adjudication regarding the liability
6 aspect of Mr. Zhu’s WLAD disparate impact claim is proper with the issue of
7 damages being left for trial.
8

9
10 **III. CONCLUSION**

11 Mr. Zhu’s motion should be granted.

12 DATED this May 12, 2016.

13 *s/ Matt Crotty* _____
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CERTIFICATE OF SERVICE

1
2 I certify that on May 12, 2016 I electronically filed the foregoing with the
3 Clerk of the Court using the CM/ECF system, which will send notification of such
4 filing to those attorneys of record registered on the CM/ECF system. All other
5 parties, if any, shall be served in accordance with the Federal Rules of Civil
6 Procedure.
7

8 Dated this May 12, 2016.
9

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