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**IN THE COURT OF APPEALS
OF THE STATE OF WASHINGTON
DIVISION I**

Northwest Center, et al.,

Defendants/Appellants

v.

Lennie J. Thompson

Plaintiff/Respondent

**RESPONDING BRIEF OF PLAINTIFF/RESPONDENT
LENNIE J. THOMPSON, Pro se.,
and
MOTION TO ATTACH APPEAL/REVIEW
OF HARRASSMENT ORDER**

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I. INTRODUCTION

Plaintiff/Respondent, Lennie J. Thompson seeks immediate relief from the harassing and debilitating actions Northwest Center has taken against him in this misaligned attack designed and orchestrated to encumber him, a single individual, with very little law experience, in order to put as much of a burden as possible on him to navigate the mechanization of the law and the court system. It is Mr. Thompson's assertion that the lower trial court judge, the Hon. Beth M. Andrus, reserved the so-called mandatory \$10,000 fine and court and legal fees for trial due to Lennie's assertion in court that the U.S. Supreme Court and many law experts including the Gonzaga Law Review¹...

I. Introduction (page 264)

A group of concerned citizens band together to oppose a powerful developer's plan to build a solid waste disposal facility near a residential area. The citizen group appears at public hearings on the matter, submits letters and reports to relevant federal and state agencies, and publishes letters in the local media. The enraged developer then files suit against the citizen group and its things, defamation, intentional interference with business relations, abuse of process, and civil conspiracy. The citizen group asserts a defense based on its constitutional right to petition the government. The tenacious and well-funded developer survives the citizen group's early attempt to dismiss on the pleadings. The developer then assails the citizen group with oppressive discovery, seeking such information as membership lists, meeting minutes, and financial records. Eventually, after years of litigation, the citizen group prevails and recovers statutory costs and attorney fees. Notwithstanding the loss in court, the developer is pleased; it expected to lose going in, but the cost was sustainable. More importantly, the developer achieved an

¹ A Better SLAPP Trap: Washington State's Enhanced Statutory Protection for Targets of "Strategic Lawsuits Against Public Participation"
Michael Eric Johnston*

* Judicial Law Clerk, Washington Court of Appeals, Division 111 (2000 to present), Division 1 (1998-2000); J.D., *magna cum laude*, Gonzaga University School of Law, 1998; Editor-in-Chief, *Gonzaga Law Review*, 1997-1998.

important strategic victory. The exhausted members of the citizen group, fearful of future litigation, will find it difficult to organize and sustain a campaign if a similar issue arises in the future.

The above scenario is typical of a Strategic Lawsuit Against Public Participation ("SLAPP"). A SLAPP is a retaliatory lawsuit filed against public interest groups and individuals whose constitutionally protected use of the political process offends their opponents.¹ SLAPPs rose to prominence in the 1980s in a number of contexts.² In the most common type of SLAPP, a private business enterprise sues a public interest group, and all individuals connected with it, under a variety of theories, particularly defamation.³ The vast majority of such suits fail on the merits, but not before achieving, or at least furthering, the strategic goal of disrupting the public interest activity and placing a chill on the public's future participation in political activity.⁴ A number of states have enacted legislation to deter and combat SLAPPs.

Several legal commentators have cited Washington Revised Code sections 4.24.500-.520 as an example of such legislation. Historically, Washington has seen few SLAPPs, but a recent case, *Right-Price Recreation v. Connells Prairie Community Council*,⁵ is a classic example. Although neither the Washington State Court of Appeals, nor the Washington Supreme Court interpreted sections 4.24.500-.520 in *Right-Price Recreation*, the procedural history of that case exposed certain weaknesses in the scope of protection a SLAPP target can expect from the Washington statutes.

A BETTER SLAPP TRAP

Supreme Court eventually dismissed the developer's complaint under general principles of defamation law without addressing the weaknesses of sections 4.24.500-.520.⁶ While *Right-Price Recreation* was before the Washington Supreme Court, the Washington State Legislature revisited sections 4.24.500-.520 and amended it to provide greater protection from SLAPPs.⁷

1. **GEORGE W. PRING & PENELOPE CANAN, SLAPPS: GETTING SUED FOR SPEAKING OUT** 8-9 (1996).

2. *See id.* at 3.

3. *See id.* at 6-7.

4. *See id.* at 29.

5. 105 Wash. App. 813, 21 P.3d 1157 (2001), *remanded by* 146 Wash. 2d 370, 46 P.3d 789 (2002) (*Right-Price Recreation I*). In his capacity as a judicial law clerk for the Washington Court of Appeals, the author had no role in connection with *Right-Price Recreation*. [Vol. 38:2

A New York court exhibited a particularly clear grasp of the SLAPP issue when it stated:

SLAPP suits function by forcing the target into the judicial arena where the SLAPP filer foists upon the target the expenses of a defense. The longer the litigation can be stretched out, the more litigation that can be churned, the greater the expense that is inflicted and the closer the SLAPP filer moves to success. The purpose of such gamesmanship ranges from simple retribution for past activism to discouraging future activism. Needless to say, an ultimate disposition in favor of the target often amounts merely to a pyrrhic victory. Those who lack the financial resources and emotional stamina to play out the "game" face the difficult choice of defaulting despite meritorious defenses or being brought to their knees to settle. The ripple effect of such suits in our society is enormous. Persons who have been outspoken on issues of public importance targeted in such suits or who have witnessed such suits will often choose in the future to stay silent. Short of a gun to the head, a greater threat to First Amendment expression can scarcely be imagined.²

Illustratively, the California SLAPP statute addresses this issue to a considerable extent. 171 Under this statute an alleged SLAPP is subject to a "special motion to strike" unless the filer can establish probable success on the merits. 172 The target may file the special motion within sixty days of the service of the filer's complaint or, "in the court's discretion at any later time upon terms it deems proper." 173 The trial court will hear argument on the special motion "not more than thirty days after service unless the docket condition of the court require a later hearing." 174 As noted above, discovery was the main concern of the Washington Court of Appeals in *Right-Price Recreation*. 175 Forcing targets to bear the heavy burdens of extensive litigation, including oppressive

170. See *Right-Price Recreation, LLC v. Connells Prairie Cmty. Council*, 146 Wash. 2d 370, 46 P.3d 789 (2002) (*Right-Price Recreation II*).

171. See CAL. CIV. PROC. CODE § 425.16 (West Supp. 2002).

172. § 425.16(b)(1).

173. § 425.16(f).

174. *Id.*

175. *Right-Price Recreation, LLC v. Connells Prairie Cmty. Council*, 105 Wash. App. 813, 822-26, 21 P.3d 1157, 1163-64 (2001) (*Right-Price Recreation I*).

176. See, e.g., *Gordon v. Marrone*, 590 N.Y.S.2d at 649, 656 (1992).

177. CAL. CIV. PROC. CODE § 425.16(g).

² *Gordon v. Marrone*, 590 N.Y.S.2d 649, 656 (1992).

discovery, is a primary goal of SLAPP filers.¹⁷⁶ In this regard, the California statute states:

All discovery proceedings in the action shall be stayed upon the filing of a notice of motion made pursuant to this section. The stay of discovery shall remain in effect until notice of entry of the order ruling on the motion. The court, on noticed motion and for good cause shown, may order that specified discovery be conducted notwithstanding this subdivision. ¹⁷⁷

The Washington statute should incorporate a similar discovery stay in order to avert oppressive discovery practices.

...spurn the Anti-Slapp law as a tool for high priced lawyers and people with money to do exactly what we asserted above – this is unfair and the court, once the court ascertains the truth from the evidence Mr. Thompson will present, should strike the Harassment Order and grant Mr. Thompson the \$10,000 fine and court costs and legal fees equal to that which Northwest Center and Summit Law would have charged him. It is Mr. Thompson's assertion that Judge Andrus suspected that Mr. Thompson's assertions were correct. And that is why she cut off Summit Law's attorney when he stated that, "Since Mr. Thompson is dropping the defamation part of his lawsuit, Summit Law is dropping its request for a 10,000 fine, court costs, and legal fees". She dismissed with prejudice because she hasn't seen enough of this case to decide if she wants to give NWC their pound of flesh, or award Mr. Thompson those fines and fees as she is allowed to do when it becomes evident that Summit Law and Northwest Center have been putting on this dog and pony show as a distraction and a burden to the plaintiff, Mr. Thompson,

in hopes that he would not be able to make his first important deadline in his breach of contract suit which is in April. Awarding Mr. Thompson these fines and fees and ordering Northwest Center to pay immediately would go a long way in the leveling the playing field between Mr. Thompson and Summit Law. In order to fairly ascertain the validity of his case this court must know all of the facts since Mr. Thompson's hiring at Northwest Center.

II. STATEMENT OF THE CASE

A. Background Facts.

The first thing the courts must realize is that Northwest Center has lied about Mr. Thompson from the beginning of this conflict. But the most blatant, and easily provable lie, is the one in NWC's opening brief to the appellate court, page 4 under STATEMENT OF THE CASE, paragraph 3, line 2, "*For example, Mr. Thompson stood outside of the Northwest Center's central office and yelled or argued with employees as they entered or exited the building.*" What makes this such a blatant lie is due to the following facts:

1. During the National Labor Relation Boards 8 month investigation no one, including management, and especially Jonathan Whipple, never once mentioned this alleged incident.

2. During the harassment hearing this alleged incident was never mentioned, although many other untrue accusations were hurled at Lennie in Mr. Whipple's harassment complaint. He states, "Lennie made

sure everyone knew he was a convicted felon. A lot of people told me that I was his target." It was also pointed out that Lennie had visited Geoff Nisbet at his home and made what sounded like a veiled threats. When in reality Lennie had heard that Virginia Burzotta had had a mental breakdown/hysterical fit at a recent board meeting and was fired the next day Lennie saw it as an opportunity to appeal to Mr. Nisbet's character and integrity by trying to convince him that he no longer needed to fear Virginia's tyranny. When Lennie arrived with fresh homemade fruit pies (Mr. Nisbet's a vegetarian and has loved my baking in the past) he said this, "You've put me in a very awkward position Lennie. I wish you all the best, I really do," Lennie realized then that Mr. Nisbet, being a foreign national, with a wife and new baby would be hard-pressed to jeopardize his job and family security by stepping up and doing the right thing. So Lennie backed off and merely mentioned that after the incident with Virginia there was no telling what she would say in court. He agreed and Lennie left without pressing him for his help. (As I will state later I am no salesman and have no "killer" instinct when it comes to selling – even ideas.)

3. After Lennie's quiet and peaceful protest (where Mr. Thompson smiled and waved at everyone coming in the driveways and made sure not to block traffic coming and going- See Picture) Mr. Thompson received a letter from Emily May at Northwest Center (this is the same letter brought up at the harassment hearing after Judge Peter Nault said "he could not find a pattern of harassment". Summit Law's

representative then produced this contrived letter that Lennie had forgotten completely about – due to its totally bogus content – and used it to say that Mr. Thompson had been warned (2 years earlier) not to bother NWC clients). This letter was full of lies and innuendos which painted a distorted and ugly picture of Mr. Thompson’s legal union organizing activities (See Ex-1, Emails; E-11 & E-7 thru E-10, E-13, E-15, E-18 thru 21, and E-24 thru E-30) protected by the National Labor Relations Act. These emails are the only evidence Northwest Center has against me. In the harassment hearing they stated Mr. Thompson had been contacting employees and clients and that when Lennie started he agreed not to contact anyone after leaving NWC. Mr. Thompson then asked to see my file (Ex-1; E-19 & E-20). When Lennie found no such signed agreement in his employee file Lennie pointed this out to Emily May and she admitted there was no signed agreement so NWC’s assertion that Lennie could not contact people was a scare tactic. It even claimed that Mr. Thompson went to see a client with the intent of defaming Northwest Center. The client mentioned in this letter is one Mr. Thompson had never even heard of - much less spoken to – and we challenge Northwest Center to show any documentation linking Mr. Thompson with this client's name. This alleged incident with an unknown client was the main reason and focus of the letter. Due to its fraudulent nature it should be considered “fruit from a poisonous tree”. And by law should be thrown out in its entirety along with the harassment order along with this ANTI SLAPP suit.

B. PLAINTIFF/RESPONDANT'S STATEMENT

The following is a statement in Lennie Thompson's words:

When Thomas Jefferson first arrived in France as the US Ambassador, he was shocked, and appalled, at the poverty, desolation, and starvation he saw in the streets. However, he was forced by position to rub elbows with an aristocracy that had an attitude not unlike today's Republicans – if the people don't have any money (bread), then let them dig for gold (let them eat cake), as if it were a commodity that was laying around for anyone to partake. After many years as ambassador he returned to America to find the new government engaging in similar practices that had eventually brought down the French aristocracy. He protested vehemently and reminded those who started and formulated this great adventure called freedom that returning to the folly of having an elitist form of government, such as Kings, Queens, dictators, and other such tyrants, after having fought so hard to be free of such evil, was hypocrisy in the truest sense.

Now like me, Jefferson was no stranger to tragedy. During his lifetime he lost all but one of his children and his wife. Four months before writing the Declaration of Independence he received word that his mother died and that his daughter was very ill. But still he and he alone, wrote the Declaration of Independence. Ben Franklin refused to because he said he would never write anything that somebody else would edit. It was then left to James Madison and Thomas Jefferson.

James Madison's insisted that Thomas Jefferson write it. One reason is because Madison was such an abrasive person that most would not accept his words. But the main reason James Madison said that Thomas Jefferson had to write this famous document was because he was 10 times the writer as Mr. Madison. History has not made much of it but Thomas Jefferson and James Madison were the last two founding fathers to die 50 years to the day after they wrote the Declaration of Independence.

At the end of his days Jefferson proclaimed two basic principles. He said, " We cannot be complacent until two conditions are met: 1.) Every human being born on this continent has the right to equal, indeed, identical treatment in the machine of the law irrespective of race, creed, or class of origin. 2.) Everyone born on this continent to have roughly equal opportunity and modest prosperity. (Not hanging on by the skin of your teeth and fingernails.) And until those conditions are met we cannot rest. When those conditions are met we may say (as he would) now you may dismiss me. My work is done."

As "We the People" look at our court system today it is common knowledge that unless you can afford an attorney, chances of getting justice are next to impossible when faced with the overwhelming resources of those who are in control. It is ironic that in today's prison system the definition of "Capital Punishment" is: "Them that have the capital don't get punished. Those that don't have capital get punished."

In the late 1800s Darwinism permeated many aspects of our culture, including law schools. Now law students were being taught that the law should evolve with the changing times. To that end in the early 1950s it became apparent that many Hispanic GIs were enrolling in law school due to the G.I. Bill. The National Bar Association, and law schools across the country, banded together and raised the requirement for law school from two years to three years. By doing this they forced many poor Hispanic people to take degrees which got them into the workforce quicker and cheaper.

But this deeply racial and discriminating action is not the worst thing that has evolved due to lawyers and the court system. A language so convoluted, and indiscernible, has been created so that only those who are properly schooled in a three year law school can speak and understand that language. This is *not* what Thomas Jefferson meant when he said, "Equal – indeed identical treatment in the machine of the law, irrespective of race, creed, or class of origin."

A natural consequence of this perversion of what the founding fathers originally intended and that is to create a legal system that was fair and accessible to all, is that now the courts are manipulated by the rich and famous to force their agenda on the American people and the world. That agenda is what the Bible calls "The root of all evil" – the love of money – greed. Can we really claim, as Thomas Jefferson wished, that we all, "have a right to roughly equal opportunity and modest prosperity"? (When he talked about prosperity for everyone he

meant that. It was why he rebuked the newly forming American aristocracy for acting so high and mighty and above the common people. “No! He said, “We are all equal and we all must act that way”.)

Abraham Lincoln was a strong, lanky, hard worker who disliked physical labor but could outwork most any man. His father even rented him out for \$.25 a day of which Abraham never saw a penny. So it is no wonder that when he first made his own money he truly appreciated the value of his labors. In an early venture taking goods and slaves down the Mississippi River on a barge he was forever and permanently changed when he saw the conditions of slaves. He had experienced what it felt like to work from dawn till dusk without compensation. This was the beginning of a decade’s long process which culminated in the Civil War and the 14 amendment. Like his mentor, Thomas Jefferson, Lincoln believed that everyone should be free and able to prosper without the fear of losing everything to someone more powerful and without scruples. The “Carpetbaggers” are famous for just such chicanery.

If, as the Darwinists proclaim, law should evolve and realize that a person's job, in this day and age, is their property and should not be taken from them without due process of law. Today, what one owns is most often tied to what one owes. Therefore, the link between employment and property is so intertwined that one cannot arbitrarily take the former without also taking a person's property. Loss of job equates to loss of home, transportation, and more often than not – family.

In September of 2008 I was interviewed by Joe Smith at Northwest Center. His first question to me was, " Before we start the interview I have to ask why would you your master's degree and all your experience want to come Northwest Center to work for \$12 an hour." I replied, "My degrees are fairly new. I'm just looking for a new career and am willing to work my way up from the bottom." He replied, "Well I'm looking at all of your experience, resume, and education and I believe we have another job for which you will be well suited and pays \$14.50 an hour. So I'm going to refer you to see CJ Glenn in another department. We'll set up another interview with him."

I not only returned for an interview with CJ Glenn but I had to return again (50 miles each way) to meet Jonathon Whipple for 5 seconds. I guess just so he could look at me.

Now as the e-mails will show (E-1) I fully divulged my one and only crime and also submitted a document from United States of America, Washington State Indeterminate Sentencing Board releasing me from any further punishment or recriminations and returning all of my rights except my right to bear arms. They advised me to contact the ATF for that.

I posit this, if Jonathon Whipple and others at Northwest Center are in fear of me because I'm a "convicted felon" then where was that concern when they were hiring me for a job which serves one of the most "at risk" and "vulnerable" clientele protected from "convicted

felons” by law? Their real, and only, fear is that they will be exposed for the malevolent employers they are. Such exposure will show many faults in Northwest Center's management, training, and how their ineffectiveness has deprived developmentally disabled clients of receiving truly effective job coaching. It was my infamous eight-page letter implying that Northwest Center fell short in these areas as well as how they compensated and treated their employees which is the real reason I was terminated. It is common knowledge at NWC that when Tom Everill shared my letter with one of his vice presidents and old-school chums the vice president's response was, “Either he goes or I go!”

But I digress. Within a couple of weeks of my hiring CEO Tom Everill attended a large Northwest Center staff meeting. He told us that he wanted Northwest Center to get back to the business of serving clients and not being concerned so much on making money. Manager Joe Smith said it was the first time in the 25 years he had been there that a CEO attended such a staff meeting.

Two months after I was hired Northwest Center announced a freeze on promotional raises. Six months later Tom Everill laid off our house lawyer, some vice presidents, and other redundant or unnecessary managers and or assistant managers. Very few line staff were let go. Joe Smith said that it was the first time he had ever seen vice presidents and management let go before line staff.

I was blown away! I had seen the five-page document when I was hired, which had promised that all employees receive extensive training, extensive support from their managers, retraining if necessary, and promised that Northwest Center would do everything it could to help me correct any errors or mistakes in order to make me a better employee. Everything I heard and saw during orientation and the first few weeks of my employment indicated that this was a place where synergy was the standard operating procedure in all things benevolent at Northwest Center. Synergy is that construct usually found in an open organization which promotes open door policies, open communication, the fostering of ideas and constructive criticism, and above all second chances.

And now I was hearing words from the CEO of what supposedly was a benevolent organization which fostered an environment where everyone cared for and helped everyone else. (I emailed him and praised him for being a "Wise CEO" and he invited me to visit him and talk about the clients sometime, E-5.) Where, as one visiting mother to Northwest Center said, "This is a place that is like what the world should be." (From an interoffice email story about NWC). I was so inspired and encouraged that I had finally found a place where with all my talents, abilities, and education I couldn't help but pour everything I had into the work at Northwest Center. For the first two weeks I didn't do much of anything, except observe a few clients and their job coaches. But no real training was offered. Toward the end of that first two weeks Jonathan

Whipple gave me a list of potential clients. I spent days in the records room reading extensively about the clients I might be working with. I was warned not to spend too much time in that room or I would go buggy. I spent hours of very productive time learning all about my clients before I met them. It paid big dividends later. In one case a client of mine was having dizzy spells and falling down. He has a cleft pallet and very few can understand him. It just so happened that my best friend as a kid, and favorite aunt, had speech impediments and I learned to understand and communicate with just about anyone – even foreign language speakers. His caregivers and other support team were having his brain scanned and all kinds of stuff until I mentioned to them something I had read in his file about very bad breath in his early years with Northwest Center, due to bad teeth. From my own personal experience I knew that an infected molar near his inner ear could cause pressure on that inner ear and cause the dizziness. When his staff followed through on my suggestion they were blown away by my insight and knowledge of the clients past and what turned out to be the remedy for his condition.

When I was finally introduced to my clients I started the job of checking on them to make sure they were doing well in their jobs. Something I noticed right away about nearly every client was that when the job coach, me, showed up they got real nervous and started acting real busy.

I remember how intimidated I felt with my abusive, redheaded Scott/Irish, dad standing over me and criticizing my work. I realized that our clients tended to look at job coaches as a second boss. I started earning their trust by impressing upon them that I was not their boss. But that in fact I was more like a friend, only on a professional level, who was there to help them with whatever they needed to make them successful, healthy, safe, and happy.

When I would meet with their parents/caregivers and DSHS case workers for annual planning meetings I would work very hard at convincing them that I was an old-school customer service expert. And whatever they needed to help our client, whether it was work related or not, they could call me. If I didn't have an answer I knew how to network resources in order to give them the help they need.

It sometimes took two or three meetings/conversations to convince them I was sincere. Once I gained their confidence they opened up to me and gave me insight into our client that helped me to give the best possible customer service available.

I saved jobs. I retrained clients who hated their jobs so that they could better perform their jobs and gain the respect of their coworkers and supervisors.

In one case I convinced the head of HR at Safeway's Northwest division in Bellevue to rescind a \$1500 promissory note that their so-called recovery team intimidated one of our clients into signing after she was caught shoplifting during breaks. When this incident first occurred,

Jonathan Whipple, Virginia Burzotta, and others connected to Northwest Center were running around like chickens with their heads cut off trying to figure out what to do. Jonathan Whipple informed me that we received an e-mail from a disgruntled former Northwest Center employee who is now a caseworker from DSH S. Her question was, "What are you doing to support our client?"

Since I first heard from Jonathan Whipple on the phone about the situation on the way home the night before I had only come up with a solution. When I came into the office and everyone was running around acting desperate the first thing I did was Google Safeway's developmental disability department. I called the head lady who coordinates over 10,000 disabled employees nationwide and explained the situation. I pointed out the fallacy of fining someone and making them sign a document which they really didn't understand. I also mentioned that Safeway had barred her for life but her dad had been coming there with our client for decades and he refused to follow such demeaning mandates. As a member of the community, I told her it would be bad publicity and public relations for Safeway to follow through and collect the \$1500 promissory note. She agreed and gave me the direct line to the head of HR for the Northwest division in Bellevue. She also agreed. And told me she would look into it and within 10 days sent a letter rescinding the promissory note. Even the disgruntled former Northwest Center employee who was the caseworker from DSH S had tried to find relief for our client that old day to no avail. She and the

client's father were amazed and blown away with the ease and effectiveness with which I accomplished this task.

After a while I started to sense a nervous attitude from Mr. Whipple and Virginia as though they feared I might climb over them and eventually become their boss. This was not my intent.

Although after the letter to and meeting with our CEO early in my employment Geoff Nisbet met me in the hall directly afterwards and said, "So how did our next CEO's meeting go with our present CEO?" He saw my potential early on and was constantly praising my work (It is my goal to subpoena the interoffice emails, that pertain to me and this case and support my assertion that I was an exemplary employee and that the "reasons" they gave for firing me were totally unjustified.). I told him that I thought that he would make a better CEO because it was obvious to me that he knew more and taught more than anyone else in the organization.

From the time I first started working at Northwest Center we had 75 clients who need jobs. Over the nearly 2 years I was there many of those hired to find jobs became criticized, and frustrated because they were expected to obtain results with little or no training.

In January of 2010, the year I was fired, I was requested to attend the training for what was referred to as "Customized Job Carving". I noticed that the other job coaches who did what I did were not required to come. I can only conjecture that they thought because I had been

such a shining star since my arrival that I might perform similar miracles getting clients jobs. They were mistaken.

At the beginning of the meeting I placed myself at the long table directly across from our highly paid trainer. Before the meeting really got started I raise my hand and said this, "I just want to say up front that I am not a salesman - never have been. I just don't have the instincts to go for the 'kill', as they call it."

At this point the assistant manager of the job recruiting department, Katie Martin, who is highly regarded by Virginia, Mr. Whipple, and many others, including myself, said this, "Oh Lennie, I've always thought you could be much more than a job coach." She is a bright young lady whose care for the clients and enthusiasm for the job makes her one of the brightest and best Northwest Center has to offer.

Her comment gave me pause to reflect on just what I really did have to offer Northwest Center. Although I was willing to try to find jobs, I realized that my true potential at Northwest Center would be realized if they would allow me to train our other job coaches to give the kind of coaching and excellent customer service that had made me so successful at the job. In an earlier conversation with Safeway's HR director she commented that, "You know many of those jobs are given to clients who can't really do the job. It's more like a charity situation." I assured her that we at Northwest Center expect our clients to do the job they were hired for. I assured her that we at Northwest Center were taking steps to do a better job of fitting the client to the job.

I was tested by Menses as having a 150+ IQ and the test indicated my specialty is in what is called Spatial Math – which translates “Big Picture Mentality”. What I saw was an organization frantic to do whatever it takes to get 75 clients jobs. I also realized that many of the young college graduates that got these jobs had very little or no experience in the job market, especially in the areas that many of our clients worked. I, however, had done just about every job an uneducated person could get so I knew what was required by my clients’ employers and how to get it done. I also knew that if you can’t produce a product that someone wants you just can’t sell it. That is what Northwest Center has been trying to do.

It was then that I started to write the letter (E-28, 22 thru 26. Please note how Virginia Burzotta tried to get her assistant, Krissy Shaw, to tell me who gave me her email address –no doubt so they could get rid of my inside people). At one point I asked our Administrative Coordinator, Geoff Nisbet, if it would be possible to train our other job coaches to do what I do. His response was, "Nobody can do what you do, Lennie!" "But what if I trained them? I asked. His eyebrows rose with a curious, but interested, expression. “I’ll run it by Virginia and see what she thinks,” he said.

But I sensed that Mr. Nisbet, who had become so busy that we hardly ever spoke anymore, would have little time to pursue my inquiry. You see when I first started at Northwest Center Geoff Nisbet was really the only person who spent any time with me giving me any real training.

This usually involved proper procedures regarding paperwork. But he also gave me some useful insight into the autistic which later helped me formulate a plan to save one of my client's jobs.

This client had been verbally warned several times over an eight year period not to steal candy and other items. One day his boss called me crying saying that she would have to fire our client because this time he had taken \$40 that they had left next to the cash register. When confronted he gave it right back. She said that her company had a no tolerance policy and she could lose her job if they found out she had let similar incidences go in the past. I suggested we try a two-week suspension and after that two-week suspension have our client sign a contract stating that he would not steal again and have his bosses and mom sign it too. It then would be posted in his locker, his closet at home, and other strategic places. She wasn't sure what to do at that point so I suggested I call my bosses, who had more experience with this than me, or so I thought, and see if they had any ideas. Mr. Whipple explained that our client had a history of theft and losing his job was a natural consequence of his actions. He had no solutions to save a job our client had had for 8 years. He was such an excellent custodian and his boss was heartbroken she was going to have to fire him.

When I called my clients boss back her first question was, "Now how does this suspension and contract work?" This client is a very bright young man. He could do so much more. When I was fired my first so-called "harassing" (?) E-mail to Northwest Center was a request to

follow-up on this client and several other clients' needs that I had been working on. My main concern was that this afore mentioned client could have a lot more freedom and quality of life if he was taught how to use the regular bus. It never happened. I was going to attempt it on my own time and dime but now Northwest Center has me so spooked I am afraid to do what comes natural to me - help those in need! I can't even contact my clients, even though I already have permission of several parents and guardians, without fear of another trumped up charge of harassment or worse. I need the court to order NWC to back off so that I can pursue 'disclosure' and witnesses.

Keep in mind that during my whole time at Northwest Center I was never reprimanded for misconduct, poor performance, or not adhering to the standards of paperwork which is the bogus reasons for which they fired me. I challenge Northwest Center to produce any real evidence that their reasons for firing me have validity.

On the other hand, the record will show that several in-house e-mails from Geoff Nisbet praised me constantly for my great job performance and top quality/punctual paperwork. In Northwest Center's brief to the appellate court mentioned my 'poor job performance' but failed to mention the 'paperwork issue' as one of the reasons the letter said I was fired. I believe this is due to their realization that my paperwork is unimpeachable. And that perhaps Virginia's motive for wanting to keep flow notes uninteresting, as Geoff Nisbet described to me, was merely a tool to keep anyone from looking capable, and

exceptional and therefore show her up and quite possibly pass her up and take the CEO position she and Jonathan Whipple had their eyes on. It is common knowledge that after her mental breakdown and subsequent firing, research and investigation uncovered the fact that Virginia had many, many hours of work time that she could not account for. It was eventually realized by Northwest Center that she had not been doing her job all along. And perhaps it was for this reason that proper training, mentoring, and all those other things promised to us in Northwest's centers five-page 'Principle of Conduct' (to be presented at trial) never happened because Virginia was AWOL and her main tool for training was to wait for someone to make a mistake and then ream them out.

In my own personal experience I sent an e-mail to Virginia one morning and mentioned a client's name in the e-mail which I found out after the fact was allegedly a violation of confidentiality policies. After she yelled at me in an email I was met out in the hall by a chuckling, but concerned, Geoff Nisbet. He gave me this warning, "It's usually better to e-mail Virginia later in the day. She can often be short and irritable in the morning and may not use much tact when responding that early in the day."

I also have clients' job supervisors, parents, caregivers, and caseworkers who will testify to the excellent quality customer service I gave them and our clients. They will also testify to the lack of services they received before I was the job coach for the client and how

obviously vested and willing to do whatever it took to help my clients and them. As one supermarket manager stated when I was prepping him to allow me to retrain my client so he could do an acceptable job, "That previous job coach didn't do squat."

After 80 hours of training during a two-month period using photographs and labels in a five by a photo which shows every step of the process of cleaning the stores or bathrooms (when the client saw my first draft he said it was the best thing he ever got to help him his job). While I was training I did a lot of public relations work with his coworkers who I am told didn't like working with him because he kept forgetting customers purchases. Several customers and cashiers had requested that he not be allowed serve them or work with them. I explained that with his barrier bagging groceries was almost impossible because it required him to think differently for each item he bagged. I knew there were many things he could be trained to do that didn't involve short term memory. (I became Frozen Food Manager for Safeway at 16. A year later, our store in the little town of Kelso was given a letter of commendation by the Portland Division office for having one of the top three stores, in frozen food sales, in the Portland Division.) When I was done everyone appreciated him and he started to enjoy his job. A couple of months later the store closed. But he got a job with the same supermarket chain at a store closer to his home. I convinced the new store manager that he could do many other tasks but bagging groceries was difficult for him.

A few months later at an annual planning meeting with his caseworker and mom I explained the process of training him to clean bathrooms and show them the small photo album I created to help him do and learn the job properly. He told us that they had been giving him jobs like pulling old milk and dairy products by using the pull date. A simple list and instructions were all he needed. And then he announced that last week he had cleaned the bathrooms at the new store and was told later that was the cleanest they had ever been. I picked up the photo out, smiled at the caseworker, and announced, "He now has this task embedded in his long-term memory. He can clean any bathroom. He no longer needs this photo album. All the case manager could say is, "Wow!" She didn't even bother asking the normal questions about how much time I had spent with the client working on certain things. She could see, like Geoff Nisbet often observed, I went way beyond the call of duty and always went the extra mile.

In May of 2010 Jonathan Whipple came to me all excited and happy. He told me, "The board has set aside a certain amount for those who are deserving of raises. You've got one of the highest raises we gave \$.95."

At the time I was still writing my eight-page proposal for better training and compensation. I looked at John and said, "Really! After all the jobs and money I've made and saved for Northwest Center you're telling me that's all I'm worth?" "Well some people didn't get anything. .

Some people didn't get anything. Some people got \$.25 or \$.50 an hour. You got one of the highest raises.”

“John I have a 1997 Corolla with over 200,000 miles on it that if it had a serious break down I wouldn't be able to fix it. And without a car I wouldn't be able to do my job.” He replied, “Well unfortunately that has happened to some of our employees.”

I couldn't believe it, “You mean to tell me that Northwest Center with all of its industries and resources including a used car lot couldn't figure out some way of putting valued employees into a decent used car and arranged to take payments out of their checks?”

Needless to say he was less than ecstatic over my response. This happened two weeks before I sent the offending letter to Tom Everill. When I did send it I received an out of office reply. Mr. Everill would not be back until Monday. When he returned he e-mailed me and stated, “This is a lot to think about. I'll have to get back to you.” I replied, “I understand. It's a lot to take in. I will wait with anticipation for your response.”

Three days later, on Wednesday morning, Jonathan Whipple called me in the field. He asked if I would come in to the office about 3:30 before going home. I asked why and he said he just wanted to discuss something with me. I called my prayer chain. (cont... page 30)

Not having said much about it up until this point the court should be aware that God and His son Jesus and the Holy Spirit have had a great and daily impact on my life since abuse, and neglect led me to a

place in my life where I was forced to rob a small hometown trailer bank for \$4,315.00 in 1978 to pay for an \$800 cocaine debt I thought I was going to get killed over. At the time my father was dying of a brain tumor and my step-mother had frozen me out of the construction business he and I had and subsequently closed me off from my father. He died just before Christmas and right before I was sentenced.

Since I accepted the undeniable truths in the Bible and started to try daily to live by those principles and laws that Common Law and subsequently modern day law are derived from I have only one real desire in this world - to pay back a little of what He gave so much of to me - eternal life, hope, joy, beauty, forgiveness, mercy, truth and justice. Because I have seen and received so little truth and justice in my life I was recently told by a counselor that I have been a victim all of my life. That is not something a 61-year-old man like myself wants to hear.

That is why, as I have stated, I am dedicated to exposing Northwest Center's dastardly and malevolent deeds not only for truth and justice for myself but for all those who receive services and work(ed) for Northwest Center and organizations like them. By bringing their darkness into the light that darkness will disappear.

I know that Northwest Center was started by a conglomerate of parents with special needs children who were primarily Christian. But after over 40 years it is only natural that such a large nonprofit organization that has to compete for new employees and retention of old employees with government agencies that pay nearly twice as much with

excellent benefits. What tends to happen is that those who are highly motivated, and have a lot to offer go to where they can receive better pay, compensation, and union protection. Those who aren't motivated and have far less to offer tend to stay put and wait out the years until the competition takes better jobs leaving them to rise to the top. These despots like Virginia Burzotta and Jonathan Whipple (Who got his job through a fellow lawyer friend of his dad who was a board member at Northwest Center. His father has had the connections and power to attain many jobs for Northwest Center clients. If not for these two facts Jonathan Whipple wouldn't have lasted a year at Northwest Center, given his job history.)

Which brings me to another issue? The lawyers at Summit Law keep referring to me as a convicted felon. Although this is technically true, 30 years of dedication to public service, an executive resume that impresses most that see it and letters of recommendation from judges, lawyers (I served on the Montana Bar Association's 'Fee Dispute Resolution Board'), county commissioners, professors, and pastors I believe that reference is inflammatory and designed to stereo type me as an obviously violent person. Did you know that when I robbed the bank I took the bullets out for fear of hurting anyone accidently? I had it in my mind that if confronted I would give up without a struggle. I just needed help and didn't know how to get it.

How would Mr. Whipple like it if I referred to him as an inapt, addle-brained alcoholic, with short and long-term memory problems,

daddy acceptance issues, with no real management training or experience and who uses his employees for scapegoats in order to avoid admitting to his own mistakes and failures in training his employees (E-41). He does this because of his fear of failure in the eyes of his father. But I won't sink to that level.

I will point out that after I sent my letter within a few weeks a huge staff meeting was called and Northwest Center employees were promised better training, and raises based on performance and not seniority. Part of his plan was for supervisors like Jonathan Whipple to perform employee evaluations. In a conversation he had with Shannon Reid he laughed when she asked when he was going to start doing evaluations. Needless to say there were never any evaluations or raises based on them. It was all just another dog and pony show to appease the masses until they forgot about my letter which outlined similar ideas.

After that Northwest Center started to become a strictly 'scientific management' oriented organization. The synergy that I thought Northwest Center had was a mirage which has turned into the ghost of Christmas past.

The day after I visited Geoff Nisbet, who had told me a year into the job that it was a great job but should pay more, there was a big staff meeting at Northwest Center. In the meeting management made many demands of the line staff requiring them to do much more than they ever have. I was pleased to hear that Mr. Nisbet spoke up and said, "How can you expect people to do so much for only \$12 an hour."

After months of being one of Jonathan Whipple's biggest confidants, it was brought to his attention that he had not trained Shannon Reid to bill differently than others on an especially different client who had a job acquired by Mr. Whipple's father. Realizing the mess had made he put it on Shannon Reid as being the one who failed. He defriended her on Facebook and rode her so hard that she finally quit in frustration and disgust. (I have a letter - which will be presented as evidence at trial, along with her personal testimony in court - she wrote to unemployment that paints a perfect picture of how you can be on top at NWC for years and suddenly tossed for phony and arbitrary reasons.)

Case in point – (cont. from page 26) Two days after Tom Everill respondent to my letter, as I said before, I was called into the office by Jonathan Whipple. In my spirit I knew something was up. So I made a couple of calls and ask my wife and a couple of friends at work to contact their prayer cha chains and pray for me at 3:30. I started praying too.

When I arrived at Northwest Center, Jonathan Whipple met me with a big smile and a handshake. He then escorted me into the large training room where VP Virginia Burzotta and HR director Emily May were waiting. I could see by the look of horror and pain in Emily's face that something very bad was about to happen, and she didn't like being a part of. As I was coming to the table I was told that there would be no disciplinary action or correction (In other words they were completely

circumventing their 5 page promise of correction and retraining if needed.)

When I sat down next to Jon he fired me in the most eloquent, and obviously very well practiced, terminology I had ever heard. "Lennie, at this time Northwest Center is terminating its employer/employee relationship with you." Upon reflection I can't help but feel that because of the ease in which Mr. Whipple made this statement he had done it many times - often without provocation - so he displayed, and probably felt, no look of remorse, shame, nor expressed any need to apologize.

The announcement took me quite by surprise - so much so that it took me a few seconds to respond. "Why I asked?" John responded, "We've had some complaints from some of your clients employers who don't like the way your coaching their employees." "Who" I asked? "They wish to remain anonymous," Mr. Whipple responded.

"Well I find that very hard to believe, given the fact that I've worked very hard to build a rapport with all of my clients employers and coworkers and assure them that whenever they had a problem with our client(s) to call me immediately, 24/7," I replied. VP Virginia Burzotta replied, "Well I don't know about that, but your flow notes are more about you than your clients."

"Look, I know what this is really about. It's about the letter I wrote to Tom Everill," I replied. Virginia said, as she looked at Jon, "I didn't see a letter did you John?" "No," he said.

III. ARGUMENT

I knew for certain then that this procedure was just a formality. And rather than fire me for no reason, which just wouldn't have flown with the rest of the staff, (especially those who knew my Superior work), in an organization that is supposed to be benevolent and full of synergy. Firing someone for "NO REASON" goes against everything Northwest Center "says" they believe in. That is why they have to give a REASON - no matter how bogus - why they fire people.

One of the reasons I had called and asked people to pray for me was to pray for my tongue. When I was younger I had a propensity towards reacting bitterly to unjust and unfair treatment by telling people just exactly how I felt about it, even if it was someone else who was being mistreated. I wanted to make sure I didn't say anything that could be used against me should the meeting end in a negative outcome.

So after we wrapped up Emily may escorted me to my office as I collected my belongings and exited the building. In the hallway, where no one could hear us, Emily confessed this to me, "I saw the letter Lennie." The look on her face was one that told me she didn't know what else to say. And though I felt like asking her if she knew if Virginia and Jon had seen the letter once again, my empathetic heart just couldn't see fit to put her on the spot, knowing how miserable she already was over the situation.

I left immediately in my car for the 50 mile trip home. Later I called Andre Butler at Northwest Center and he reported to me that Jonathan

Whipple had been running frantically back and forth in the hallway between the main lobby and clients entrance fervently asking Andre, as well as others, “Is that Lennie? Is that his car? Is he coming back?” Finally Andre told him, “Jon, Lennie lives 50 miles from here. He's halfway home by now.” Mr. Butler told me later how comical he thought it was that Jon was in such fear of me. Andre knows from spending many hours with me and hearing my life story and how victimized I was all my life, and he knows, as anyone who really does know me, that I don't have a vengeful bone in my body. That's not to say I don't believe in truth and justice that is acquired through lawful and civil means.

I would no more risk my future, family, and freedom than I would deny my beloved Jesus Christ, even with a gun at my head, or my loved ones. Because despite how the media portrays the few fanatics that “claim” to know Jesus and follow the laws and principles in the Bible, real Christians always ask first, “What would Jesus do?” It just goes to show how little effort my immediate supervisor, Jonathan Whipple, put into getting to know me.

The root of this whole controversy lies in the unconstitutional laws called “will to work” or “right to work” laws. These laws were created through much effort and expense by big business to convince the masses that the fate of their jobs was in their hands (not unions and their dues), or their employers, should things not work out. Their real purpose is to

finally re-create a workforce that is forced to do whatever its employers demand.

An unexpected side effect is that now employers interpret that “any reason” means they can make up a reason, even if it isn't true. But it means exactly that –“any reason”. But Oxford's *Advances Learning Dictionary* defines “reason” as:

“a cause or an explanation for something that has happened or that somebody has done.”

Please note that the definition says “has done” and “has happened”. And though the definition says there needs to be an “explanation” none was given to me. By keeping be the complaining employers anonymous and not pointing to specifics in my ‘paper work’ they denied me a real “reason”. That’s because the smallest morsel of job ineffectiveness on my part, if any, pales in comparison to the monumental feats, and with the help of God miracles, I performed in the nearly 2 years I worked at Northwest Center.

Therefore, as I've tried to make clear, the only fear anyone at Northwest Center has is knowing my abilities, education, and skill to figure things out and come up with solutions. Once the truth is revealed some of them will either be out of a job or up on federal charges for lying to the NLRB.

I believe there are two reasons the NLRB wasn't able to move forward with any charges: 1) Because for decades conservatives have been defunding a national watchdog agency that endeavors to protect the

majority of people in this country who actually work for a living. Though Summit Law sites “personal reasons” as the reason the NLRB chose not to pursue my case, I was told by the local director, Bob Sweeney, and each of the three different English as a second language extern lawyers I had on my case over a 10 month period (no continuity and lots of language barriers) that, “Unless we can build a rock solid case that is a slam dunk/guarantee win we cannot afford to move forward.”

So as I stated earlier without resources, especially money and good lawyers, it is nearly impossible for the common man to get justice under the labor laws of this country. Questions: How appropriate is it for Judge Nault to represent NWC given his history on the bench and his involvement as the presiding judge on the harassment case under question?) As US Supreme Court Chief Justice Black once said, and I paraphrase: **When all other remedies fail the common man it is up to the courts to see that justice is done.**

My question to the court today is do you believe I can receive justice if the courts cannot somehow clear the obstacles of bureaucracy, and so-called legal interpretations, without help from the courts. By help I mean someone who could do some pro bono work for me navigating the process for subpoenas, summons, and any other convoluted processes that will encumber me from moving forward with my case. I'm not asking for help in the court room or preparing briefs or doing all

the work in the processes mentioned. I merely need a willing advisor to help me through these hurdles.

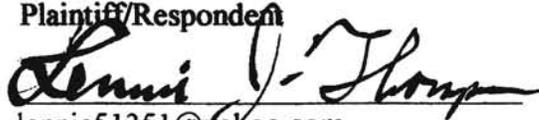
IV. CONCLUSION

Northwest Center never proved their case against Lennie regarding the harassment of Jonathan Whipple. His statements (mostly lies) were never substantiated by anyone he and Northwest Center alluded to. If others at Northwest Center were truly afraid of Lennie then they should have been required to either testify at the harassment hearing, which they *will* at trial. Or submit a sworn affidavit to that effect.

Not having met this burden, the right to face my accusers, this court should strike down the harassment order or rehear the harassment case. In either case the court should strike the Harassment Order and grant Mr. Thompson the \$10,000 fin costs, and legal fees and statutory penalty under RCW 4.24.525 equal to that which Northwest Center and Summit Law would have charged him because they have defined just what other cases show – the ANTI SLAPP laws are abused and used against the weak and that is exactly what has happened in this case.

DATED this 22nd day of March, 2013,

Respectfully submitted
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Plaintiff/Respondent



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Exhibit 2; (E-mail Exhibits):

Northwest Center has copies of all of these emails and since they chose not to bring them to the harassment hearing but alluded to them the court should look at these to show how benevolent and non-threatening they are.

E-1) Lennie Thompson to Northwest Center – September 30, 2008 – criminal background statement – (3)-[Represents number of pages.]

E-2) Lennie Thompson to spirit radio – December 29, 2008 – Christmas presents for clients (1)

E-3) Lennie Thompson to church – January 16, 2009 – permission read Virginia's e-mail (5)

E-4) Neal Cronic – June 18, 2009 – safety meeting at emergency command ctr. (2)

E-5) Lennie Thompson to Tom Everell – July 15, 2009 – praising CEO for wise layoff decisions (3)

E-6) Northwest Center to Lennie Thompson – September 15, 2009 – Jean Kantu announces radio adds.(1)

Labor Organizing Efforts/Terminations

E-7) Lennie Thompson to Shannon Reid – May 15, 2010 – regarding organization of labor (1)

E-8) Lennie Thompson to Shannon Reid – May 15, 2010 – regarding organization of labor (2)

E-9) Lennie Thompson to NLRB – May 15, 2010 – regarding organization of labor (2) FWD^^^

E-10) Lennie Thompson to NLRB – June 10, 2010 – regarding organization of labor (2) FWD^^^

E-11) Lennie Thompson to Emily May/GF/fwd NLRB – June 12, 2010 – re: CLIENTS NEEDS after Lennie's Termination (2)

E-12) Lennie Thompson to Tom Everill – June 24, 2010 – reconsider termination (1)

- E-13) Lennie Thompson to Tom Everill/fwd-NLRB – July 15, 2010 – reconsider termination (1)
- E-14) Lennie Thompson to Tom Everill – July 18, 2010 – reconsider termination/teeth pulled (1)
- E-15) Lennie Thompson to Tom Everill/FWD-NLRB – July 18, 2010 – reconsider termination/teeth pulled (1)
- E-16) Lennie Thompson to Board Member Ms. Maddox – July 24, 2010 – regarding hypocrisy of NWC (1)
- E-17) Lennie Thompson to Board Member Ms. Maddox/fwd NLRB – July 24, 2010 – regarding hypocrisy of NWC (1)
- E-18) L. Thompson to Seattle Public Health/fwd-NLRB – July 28, 2010 – re: unsanitary conditions @ Fairlane Café(2)
- E-19) Lennie Thompson to Northwest Center/fwd NLRB – October 5, 2010 –re: employment records(2)
- E-20) Lennie Thompson to Northwest Center/fwd NLRB – October 5, 2010 –re: employment records(6)
- E-21) Lennie Thompson to NLRB – October 5, 2010 – contact with LIUNA regarding representation(1)
- E-22) Lennie Thompson to Geoff Nisbet and 50 other NWC EMPLOYEES – October 19, 2010 –ESTEEMED Coworkers**
- E-23) Krissy Shaw to Lennie Thompson(Virginia Burzotta’s Assistant) – October 19, 2010 – how e-mails obtained(1)**
- E-24) Krissy Shaw to ^^ ^^/fwd TEAMSTERS – October 19, 2010 – how e-mails obtained(2)
- E-25) Krissy Shaw to ^^ ^^/fwd NLRB– October 19, 2010 – how e-mails obtained(2)
- E-26) Lennie Thompson to Summit Law – October 19, 2010 – informed NWC’s lawyers regarding 50 e-mails to NWC(1)
- E-27) Lennie Thompson to NLRB – October 24th 2010 – request for section 10 J proceedings/return to work(1)

- E-28) **L Thompson to NLRB – November 5, 2010–Original Email(10/19/10) with responses from NWC(14)**
- E-29) Lennie Thompson to NLRB – November 4, 2010 – correspondence regarding Cassie and Geoff as witnesses (1)
- E-30) Lennie Thompson to NLRB – February 14, 2011 –RE: NO Discussing Wages policy at NWC(1)
- E-31) NLRB appeals to Lennie Thompson – March 9, 2011 – confirmation number: 220727(1)
- E-32) NLRB appeals to Lennie Thompson – March 9, 2011 – confirmation number: 220719(1)
- E-33) Lennie Thompson to Tom Everill – May 5, 2011 – peace and resolve(1)
- E-34) ***Today God is First*** Fwd from L. Thompson to Tom Everill – May 24, 2011 –“Fostering the Right Environment”(2)
- E-35) ***Today God is First*** Fwd from L. Thompson to Tom Everill – May 26, 2011 –“Life of Service”(2)
- E-36) ***Today God is First*** Fwd from L. Thompson to Tom Everill June 5, 2011 –“Confronting Evil”(2)
- E-37) ***Today God is First*** Fwd from L. Thompson to Geoff Nisbet – June 5, 2011 –“Confronting Evil”(2)
- E-38) Lennie Thompson to Jonathon Whipple – June 9, 2011 – sorry I upset you(1)
- E-39) Whipple pulled a shotgun on me-***Today God is First*** “Success”(2)
- E-40) ***Today God is First*** Fwd from L. Thompson to Tom Everill -June 10, 2011 –“The Success Test”(2)
- E-41) **Shannon Reid to Lennie Thompson – September 6, 2011- Sharon's letter unemployment re: unfair treatment (9)**

CERTIFICATE OF SERVICE

I, the undersigned, certify under penalty of perjury according to the laws of the State of Washington that on this date the foregoing document was filed with the Clerk of Appeals of the State of Washington and, caused to be served in the manner noted below a copy of same on the following individuals:

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Via First Class U. S Mail

DATED this 22nd day of March, 2013.


Lennie J. Thompson, Pro se, MPA