No. 101061-3

IN THE SUPREME COURT OF
THE STATE OF WASHINGTON

CHRISTOPHER DENNEY,

Petitioner,

v.

CITY OF RICHLAND,

Respondent.

ANSWER TO PETITION FOR REVIEW

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I. INTRODUCTION

Petitioner Christopher Denney seeks review of a decision affirming a summary judgment ruling in favor of respondent City of Richland. In this Public Records Act lawsuit, the trial court ruled that two investigative reports prepared at the request of the city attorney were protected work product and properly deemed exempt from public disclosure. *Denney v. City of Richland*, ___ Wn. App. 2d ___, 510 P.3d 362 (2022) (the "Decision").

The reports were prepared for City Attorney Heather Kintzley by third party investigators who were instructed by Ms. Kintzley that they would be acting as an extension of the city attorney's office and that their reports would be confidential. CP 156, 203. Ms. Kintzley directed preparation of the reports in this manner because the circumstances relating to Mr. Denney's complaint of workplace harassment caused her to reasonably anticipate litigation by Mr. Denney against the City. Decision at 365-368. Within three months of the date of

the latter of the two reports, Mr. Denney initiated a tort action against the City for employment discrimination claims that encompassed the content of his earlier complaints. *Id*. at 369.

The Court of Appeals determined that the reports were protected attorney work product. The court based its decision on undisputed statements and conduct of Mr. Denney during several weeks preceding the creation of the first report, which also informed Ms. Kintzley's basis for requesting the second report. *Id*. at 365-368

Mr. Denney does not argue that the Court of Appeals applied the wrong legal standard. Instead, Mr. Denney asks this Court for a change in the law of work product protection. Mr. Denney argues that workplace investigations by public employers are an exceptional circumstance where the purposes served by the work product doctrine must give way to public disclosure. In fact, his theory is bolder. According to Mr. Denney, any area touching on antidiscrimination investigations—not just public employment—may require

suppressing the work product doctrine in some new but unarticulated fashion. Petition at 18

The work product doctrine's guiding principles were settled by the United States Supreme Court in *Hickman v. Taylor*, 329 U.S. 495, 511 (1947). This Court considered federal jurisprudence and accepted the traditional work product formulation in *Heidebrink v. Moriwaki*, 104 Wn.2d 392, 395, 706 P.2d 212 (1985). The Court reexamined the basis for the doctrine in the PRA context in *Limstrom v. Ladenburg*, 136 Wn.2d 595, 609-612, 963 P.2d 869 (1998), and again in *Sanders v. State*, 169 Wn.2d 827, 854-857, 240 P.3d 120 (2010). No Washington case and no federal case known to the undersigned has given special consideration to the subject matter of a dispute as an element of the work product doctrine.

The City agrees with Mr. Denney that workplace investigations can pose an intersection of antidiscrimination purposes and work product protection. But this only points out the need for lawyers and judges to have reliable rules for

making work product determinations in all areas where litigation is reasonably anticipated. Lawyers need to be able to undertake objective factual investigations to advise their clients properly just as much in workplace discrimination matters as elsewhere, and the "necessity for protection of attorney work product does not diminish because an attorney represents a government agency." *Soter v. Cowles Pub. Co.*, 162 Wn.2d 716, 742, 174 P.3d 60 (2007).

Mr. Denney has literally no precedent—much less any Washington precedent conflicting with the Court of Appeals decision—for the argument that the work product doctrine should not apply where the subject matter of the anticipated litigation involves public employment workplace discrimination.

The rest of Mr. Denney's petition is based on the fact-specific analysis of the Court of Appeals regarding the two investigative reports. Mr. Denney argues that the City was a bad actor in seeking to protect the reports, and that Ms.

Kintzley's grounds for directing preparation of the reports as work product were unreasonable. These theories were fully explored below and do not present a reason for the Court to grant review under RAP 13.4(b).

The Court should decline Mr. Denney's invitation to upend decades of work product jurisprudence. Trial courts are adept at identifying unsubstantiated claims of work product. There is no principled way to vary the work product doctrine based on the subject matter of a dispute.

II. COUNTERSTATEMENT OF THE CASE

The facts of this case are set forth in *Denney*, 510 P.3d at 365-69. The factual recitation in Mr. Denney's petition is misleading in several respects.

First, Mr. Denney states that Ms. Kintzley "admitted" during her deposition that the reports were created to comply with the City's antidiscrimination policy "rather than" in anticipation of litigation. Petition at 15. His citation for this, CP 310-311, says no such thing. He also states that the reports

were “undisputedly” created for ordinary City business purposes “and without regard for any anticipated litigation.” Petition at 13. This time he cites a page from a legal brief filed by the City (CP 370), which also does not support his position.

In fact, these assertions are patently false. The record is uncontroverted that but for Ms. Kintzley's reasonable anticipation of litigation from Mr. Denney against the City, she would not have retained third party investigators to investigate Mr. Denney's complaints. CP 160-163, 189-191. Otherwise, these particular investigation reports would not have been prepared. The substantive content of the reports also would have differed. Decision at 372; CP 189, 191, 310-311.

Second, Mr. Denney claims that the City has a routine practice whereby “all documents appear to be prepared in anticipation of litigation” and adds that this “is precisely what the City of Richland has done here.” Petition at 19. This is also false. The Court of Appeals correctly determined that the city attorney's office is "rarely involved" in normal workplace

investigations where only remedial action is contemplated and litigation is not anticipated. Decision at 366; CP 145-147, 166-167. Even in cases where the city attorney's office conducts the investigation, records about an investigation are not withheld absent a determination that litigation is anticipated. CP 147-148.

Since 2012, the City's records indicate that it has used outside investigators in four instances other than the present. CP 86-87. One of these resulted in a work product assertion. CP 88. Ms. Kintzley testified in her deposition that "[t]here are many, many, many investigations that go on that are not conducted by outsiders and, you know, HR is responsible for those." CP 316. In the ordinary course, Ms. Kintzley would never hear about a workplace investigation. CP 145.

Ms. Kintzley's reasonable anticipation of litigation with Mr. Denney was corroborated by contemporaneous evidence, including her engagement letter with the third party investigators. This letter stated that the investigation "will be

conducted at the behest and direction of Richland City Attorney Heather Kintzley, and is intended for the purpose of potential litigation." CP 203. This was not mere boilerplate in a retainer letter, but was written by Ms. Kintzley to ensure the confidentiality of the reports. CP 156. She wanted the investigators "to appreciate that they were an extension of the City attorney's office and that I was asking them to perform an objective investigation into the veracity of the statements so that I could assess the risk to the City and give good legal advice to my client…." *Id*.

Third, Mr. Denney argues that Ms. Kintzley "misled [Mr. Denney] in violation of the RPCs" by informing Mr. Denney in an email dated May 9, 2016, that her interests as City Attorney were not adverse to his. Petition at 14. Ms. Kintzley's email stated that as counsel to the City she was required to take action to address unlawful workplace conduct regardless of what an investigation might reveal. CP 61. She explained that her duty was to the City as a legal entity, not to any particular individual,

and that she would seek to hold accountable anyone engaged in unlawful conduct. *Id*. As the Court of Appeals noted when discussing the email in context of her subjective anticipation of litigation, the "evidence supporting Ms. Kintzley's assertion of subjective intent is overwhelming and uncontested." Decision at 371-372.

Ms. Kintzley's objectively reasonable grounds for anticipation of litigation are a different matter from the May 9 email. On this point, her decision was informed by her further consideration of several factors, including: 1) Mr. Denney's reference to the involvement of legal counsel, as reported to Ms. Kintzley by Capt. Hardgrove (CP 149, 178); 2) Mr. Denny's own email refusing to provide any statements to anyone at the City until a meeting could take place with his union president and his attorney (CP 61); 3) Mr. Denney's assurances of cooperation with an investigation but unwillingness to specify the factual basis of his complaint (CP 149-152, 168-169, CP 186-189); 4) Mr. Denney's avoidance of

the City's process for developing an investigation on the alleged harassment (*id*.); 5) his union's ongoing arbitration of a labor grievance relating to a promotion Mr. Denney did not obtain (CP 152); and 6) a former co-worker's statement on behalf of Mr. Denney that "matters would end up in court." CP 155.

Mr. Denney's criticism of Ms. Kintzley is a red herring. On being initially presented with the claim of harassment, Ms. Kintzley explained to Mr. Denney that he could provide factual information without fear that doing so would cause Ms. Kintzley to protect or cover for the perpetrator. CP 61. Ms. Kintzley's communication encouraged him to state facts, without which no remedial action could possibly occur. CP 61. This purpose was not in conflict with her role as City Attorney to advise her client about its litigation risk.

Finally, Ms. Kintzley never "induced" Mr. Denney "to trust her" with anything. Petition at 15. For an investigation to proceed, Mr. Denney needed to explain how he was harassed.

It did not matter to Ms. Kintzley whether he gave a written statement to her or to HR, but she needed him to understand the importance of coming forward with information. CP 151. As events transpired, Mr. Denney in fact got his wish and the ensuing investigations were not conducted by Ms. Kintzley or the City HR department.

III. ARGUMENT WHY REVIEW SHOULD BE DENIED

Mr. Denney's petition is based on the "substantial public interest" prong of RAP 13.4(b)(4). Mr. Denney asks this Court to delineate a category of litigation in which the work product doctrine will not apply. Petition at 25.

A. The Court should not alter the existing attorney work product rules.

Mr. Denney argues that no PRA exemption should apply to workplace investigatory reports of public employers, even if those records were clearly created in reasonable anticipation of

litigation and otherwise fully qualify as protected work product.[1] Petition at 25.

The most applicable case is *Soter*, in which the Court recognized that the legislature codified the work product doctrine in the PRA. 162 Wn.2d at 749. The legislature did so without regard to the type of investigative report or other document at issue. RCW 42.56.290. Mr. Denney cites *Soter* in passing, but he ignores its importance here. Petition at 16.

In *Soter*, the tragic death of a nine-year-old schoolchild prompted PRA requests for investigative materials of a school district. 162 Wn.2d at 725-29. These materials, including reports and notes of witness interviews, were the work of a team of lawyers and investigators. *Id*. at 743. They were

[1] Mr. Denney's suggestion that his new rule should be limited to cases where "a public employer is required by law to investigate internal complaints of discrimination," is illusory because employers in Washington are required by law to take appropriate remedial action in response to *all* complaints of harassment. *See Perry v. Costco Wholesale, Inc.*, 123 Wn. App. 783, 793, 98 P.3d 1264 (2004).

"highly protected opinion work product." *Id*. The newspaper requesting the records argued that exempting the documents from production would encourage agencies to use the work product doctrine to avoid disclosure of "contentious or potentially embarrassing investigations." *Id*. at 748.

In response, the Court emphasized the policy justifications for the work product doctrine in modern litigation, citing *Hickman v. Taylor*. *Id*. at 748-49. Further, "[w]hether or not we agree, the legislature has provided that attorney work product and documents containing attorney client privileged information are to be protected from public disclosure under certain circumstances." *Id*. at 749. The Court concluded that "[g]eneral arguments that either attorney-client privilege or the work product doctrine should not apply when a record is being sought under the Public Records Act are more properly directed toward the legislature, which is in a position to change the law if it sees fit." *Id*.

Mr. Denney complains that the Court of Appeals "created a *per se* work product exemption under the PRA." Petition at 19. But as *Soter* recognized, the work product doctrine is part of the PRA. This Court should reject Mr. Denney's proposal to change the work product doctrine. As discussed below, the work product doctrine, and the associated test for dual purpose documents, is already adequate to identify and reject improper claims of PRA exemptions.

1. The work product doctrine applies without regard to the subject matter of a dispute.

Mr. Denney argues that public agencies will shield reports they deem damaging while producing reports that depict agencies in a positive light. Petition at 24. He has things backwards. The work product doctrine applies to records created only *after* an attorney has determined that litigation is threatened or is reasonably anticipated. *See Binks Mfg. Co. v. National Presto Indus.*, 709 F.2d 1109, 1120 (7th Cir. 1983) (even though litigation ultimately resulted, memorandum did

not qualify as work product because it was not created in anticipation of litigation).

The work product doctrine is unconcerned with the conclusions reached in an investigative report. In this case, the investigations determined that Mr. Denney's claims were unfounded. CP 158. But the reports' conclusions are irrelevant to whether the reports were prepared in anticipation of litigation in the first place.[2]

An agency withholding records under RCW 42.56.290 bears the burden of establishing that the records qualify as attorney work product. *Limstrom*, 136 Wn.2d at 612. Trial courts regularly make this determination. Mere vague assertions will not suffice. *See Estate of Dempsey by and through Smith v. Spokane Wash. Hospital Co. LLC*, 1 Wn. App.

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[2] The work product doctrine never protects underlying facts, which is why all the records Mr. Denney requested, including those relied upon by the City's investigators, were produced to Mr. Denney, and only the reports themselves were withheld. CP 191-192. Also note that Mr. Denney never made a claim of substantial need and undue hardship under CR 26(b)(4).

2d 628, 639, 406 P.3d 1162 (2017), *review denied*, 190 Wn.2d 1012 (2018) (conclusory use of "work product terms and catchphrases" is inadequate).

Mr. Denney is wrong that this allows public agencies to adopt routine practices whereby all documents are fictitiously prepared in anticipation of litigation. Concern about improper "routine practices" was extensively analyzed in 1985 in *Heidebrink,* 104 Wn.2d at 396-402. The point is that the rules have proved workable for decades. The inquiry focuses on the nature of the documents and the circumstances of the case or, in the words of *Heidebrink*, on the "specific parties involved and the expectations of those parties" so that parties may not "mechanically form[ ] their practices so as to make all documents appear to be prepared in 'anticipation of litigation.'" *Id.* at 400.

2. Mr. Denney's argument to change work product law is ill-conceived.

The ramifications of Mr. Denney's proposal to change the work product doctrine would extend far beyond the Public Records Act.

Again, the touchstone is *Soter*. There, the Court noted that even in light of the policy goals of the PRA, when considering the controversy exemption and the extent of protection offered by CR 26(b)(4), "we are interpreting the civil discovery rule that applies to all civil cases." *Soter*, 162 Wn.2d at 743. New precedent on work product will not only impact attorneys representing government agencies, but also "will impact *all* attorneys engaging in civil practice." *Id*. (emphasis in original).

As already shown, the work product doctrine protects categories of documents—those prepared in anticipation of litigation—without regard to subject matter, but rather based "on the specific parties and their expectations." *Harris v. Drake*, 152 Wn.2d 480, 487, 99 P.3d 872 (2004). Mr. Denney does not provide any rules-based guidelines for what should

change, although his argument would alter a basic procedural point of law. Mr. Denney's view is supported by no Washington precedent and runs contrary to *Soter*. His petition for review gives no reason to believe that any other jurisdiction or academic commentator has found merit in a similar approach.

Mr. Denney emphasizes that the public has a substantial interest in preventing workplace discrimination. Petition at 1, 18, 26-27. This is certainly correct, and a different lawsuit filed by Mr. Denney against the City in May 2017—the lawsuit correctly anticipated by Ms. Kintzley in 2016—tested his theory of workplace discrimination. CP 211-215. However, RAP 13.4(b)(4) is not met every time the subject matter of litigation implicates state law of substantial public interest.

Many areas of law implicate the public interest. *See, e.g.*, RCW 70A.305.010 (disposal of hazardous waste); RCW 36.70A.010 (coordinated land use planning). Mr. Denney has no suggestions on which topics of public importance—other

than discrimination in public employment—should influence the work product doctrine.

A few of the ramifications of Mr. Denney's proposal are obvious. Public employers would no longer have the benefit of protected work product in the same way that exists in other areas of law.[3] Public employers will litigate against adversaries who do not operate under the same rules. A claimant's own investigatory reports will still be protected to the full extent of CR 26(b)(4).

Aside from the obvious unfairness this will pose for pretrial discovery, there are other implications. The decision-making of public employers in pre-litigation circumstances will be less informed by lawyer guidance, or at least lawyer guidance will be less informed by neutral background

[3] Presumably Mr. Denney thinks private employers should still be allowed to rely on the existing work product rule in CR 26(b)(4). Mr. Denney's theory does not account for why discrimination in public employment requires one approach for work product but discrimination in the private sector can be adequately addressed under current law.

investigation. This is inimical to the purpose underlying the work product doctrine, which is to create a rules-driven process within an adversarial system to enhance the role of lawyers in advising their clients. *See Soter*, 162 Wn.2d at 742.

3. Courts routinely evaluate claims of attorney work product, including dual purpose documents.

The fact that the City had an independent legal duty to investigate Mr. Denney's complaints does not mean that the reports are not attorney work product, but does highlight that such dual purpose documents are given additional scrutiny.

Here, Ms. Kintzley explained that the investigations were performed so that she could determine the veracity of the allegations, perform a risk assessment, and give proper advice to her client. CP 310. The reports also informed the question of whether workplace remedial action was needed. *Id*. "Protected documents can have dual purposes." Decision at 370.

The standard for assessing work product for documents that have both a litigation and a non-litigation purpose is settled law, including in the employment setting. *See Humann v. City of Edmonds*, Cause No. C13-101MJP, 2014 WL 12026090 * 2-3 (W.D. Wash. May 12, 2014) (work product doctrine held to protect report of consultant hired by city's attorney to investigate whistleblower complaint); *Adams v. City of Montgomery*, 282 F.R.D. 627, 634 (M.D. Ala. 2012) (work product doctrine held to protect correspondence and report of investigator hired by city's attorney to investigate discrimination complaint); *cf. Morgan v. City of Federal Way*, 166 Wn.2d 747, 755, 213 P.3d 596 (2009) (work product doctrine did not apply to workplace investigation report that was not prepared in anticipation of litigation).

Mr. Denney ignores *Humann* and *Adams*, as well as all of the dual-purpose doctrine cases cited by the Court of Appeals. Decision at 370-371. He cites *Morgan* at various points, but fails to acknowledge that *Morgan* does not support his

argument because the records in that case had nothing to do with anticipated litigation. *Morgan*, 166 Wn.2d at 755.

The Court of Appeals focused on whether Ms. Kintzley subjectively believed Mr. Denney intended to litigate against the City, whether her determination was objectively reasonable, and whether the two reports would have been prepared in substantially the same form otherwise. Decision at 370-372. This was consistent with *Heidebrink*'s emphasis on evaluating "the specific parties involved and the expectation of those parties." Decision at 371-372; *Heidebrink*, 104 Wn.2d at 400. The Court of Appeals decision is a fact-specific, orthodox application of settled work product jurisprudence. Its application of the law to the facts of this case does not warrant review under RAP 13.4(b)(4).

B. Whether Mr. Denney distrusted the City's human resources department is irrelevant to the work product inquiry.

As another fact-specific contention that has little to do with RAP 13.4(b)(4), Mr. Denney argues that he distrusted the

City's HR department and that a claim of work product is objectively unreasonable if based solely on the fact that an employee "expresses distrust of an HR department[.]" Petition at 29-30. This argument is not a faithful description of the holding of the Court of Appeals and is also not based on the trial court record.

Mr. Denney is wrong to suggest that under current law public agencies can shield records by merely "assert[ing] the employee showed distrust." Petition at 23. Employee distrust of employers and their HR processes is irrelevant to the work product inquiry, which focuses on whether an attorney subjectively anticipated litigation and, if so, whether that anticipation was objectively reasonable. Decision at 371. Mr. Denney portrays his skepticism of the fairness of any investigation by the City as a way to undermine the reasonableness of Ms. Kintzley's anticipation of litigation. But the attempt to transfer his state of mind onto her litigation risk assessment is a pointless exercise. Mr. Denney may well have

been concerned about a fair investigation at the same time that Ms. Kintzley began to reasonably anticipate litigation. The end result was that independent investigators were retained, his allegations were determined to be unfounded, and Ms. Kintzley had a reliable basis to assess the legal risk of those allegations. CP 308.

Ms. Kintzley never stated that Mr. Denney's distrust of the process was the basis for her decision to hire third parties to perform the investigations. CP 149-156. Mr. Denney's collective statements and conduct, on the other hand, were grounds for her to reasonably anticipate litigation. *See supra* at 6, 9-11. The pertinent inquiry should not be informed by "looking at one motive that contributed to a document's preparation" but rather by all the "circumstances surrounding the document's preparation…." *In re Grand Jury Subpoena (Mark Torf/Torf Envtl. Mgmt.*), 357 F.3d 900, 908 (9th Cir. 2004).

An attorney who cites only an employee's stated distrust of an HR department will never have a valid basis for invoking work product. Mr. Denney sets this up as a straw argument with the hyperbole that such a claim is "[a]ll a public employer needs to" assert. Petition at 23. Mr. Denney's distrust did not cancel out the objectively reasonable grounds cited by Ms. Kintzley and acknowledged by the Court of Appeals. There is no evidence Ms. Kintzley concerned herself with Mr. Denney's opinions about the HR department in a way that superseded the actual reasons she stated for her anticipation of litigation.

C. The Court of Appeals did not impermissibly shift the burden of proof to Mr. Denney on any part of the work product/PRA exemption analysis.

Mr. Denney argues that the decision below found that the City carried its burden on work product "simply by asserting that an employee distrusted its HR department[.]" Petition at 31. Again, this is not an accurate statement of the Court of Appeals holding.

The City did not argue that the work product doctrine should apply because Mr. Denney distrusted the HR department. Ms. Kintzley's awareness of Mr. Denney's distrust of the HR department was never offered by her has a justification for seeking third party investigations in anticipation of litigation. Ms. Kintzley's decision was informed by Mr. Denney's statements, his conduct, and her perceptiveness of the circumstances surrounding the probable litigation risk of the City. She explained all of this in detail, under oath, in her deposition. *See supra* at 6, 9-11.

Mr. Denney manipulates these events and the holding of the Court of Appeals to claim that the court erroneously drew improper inferences in the City's favor on summary judgment. Petition at 30-31. But as shown above, his distrust was not a factor contrary to the grounds articulated by Ms. Kintzley for her reasonable anticipation of litigation. This is not a situation where Mr. Denney's state of mind has any relevance to the substantive legal issues.

Otherwise, any litigant could defeat his or her adversary's claim of work product protection by swearing out a declaration that he or she had not formed an intent to sue yet, but only distrusted the adversary's position on a potential dispute. If the time for measuring the reasonable anticipation of litigation is established by a prospective plaintiff's own statement of intent, confidential pre-suit investigations will generally be impossible. Attorneys who initiate investigations meant to be confidential work product will be subject to second-guessing by plaintiffs who will, when discovery disputes arise, have every incentive to re-cast their earlier motivations as benign or otherwise focused on anything but litigation.

No case validates this kind of gamesmanship. A 1989 Texas Supreme Court opinion that required a plaintiff to manifest an intent to sue in order to justify a defendant's creation of work product was overturned four years later because it "impair[ed] the policy goals of the witness statement

and party communication privileges." *In Re Fairway Methanol LLC*, 515 S.W.3d 480, 491 (Tex. Ct. App. 2017), *recognizing overruling of*, *Flores v. Fourth Court of Appeals*, 777 S.W.2d 38, 41 (Tex. 1989). A commentator observed that the *Flores* rule was unsound because it allowed plaintiffs to control the point at which work product protection attaches by choosing when to make overtly known their litigation plans. Alex Wilson Albright, *The Texas Discovery Privileges: A Fool's Game*, 70 Tex. L. Rev. 781, 817 (1992).

All of the factors Ms. Kintzley described are compatible with Mr. Denney's reservations, and his reservations do not make any of her grounds untrue or less objectively reasonable. Strictly by the rules of CR 56, further, there was no summary judgment evidence that Mr. Denney in fact harbored the distrust now emphasized in his petition. He moved for summary judgment solely on the basis of miscellaneous documents attached to a declaration of his lawyer. CP 36, 46-117. In opposing the City's cross-motion for summary judgment he

submitted a declaration of his own. CP 292-293. In it, no mention is made of his distrust as an explanation for behavior in response to the investigatory process. *Id*.

IV. CONCLUSION

For the foregoing reasons, the City of Richland respectfully requests that this Court deny Mr. Denney's petition for review.

I certify that this document contains 4,697 words, excluding the parts of the documents exempted from the word count by RAP 18.17.

RESPECTFULLY SUBMITTED this 28th day of July, 2022.

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DECLARATION OF SERVICE

I hereby declare that on the day set forth below, I electronically filed the foregoing ANSWER TO PETITION FOR REVIEW with the Supreme Court of the State of Washington, and arranged for service of a copy of the same on the parties to this action as follows:

Jesse Wing Nathaniel Flack McDonald Hoague & Bayless 705 2nd Ave., Ste. 1500 Seattle, WA 98104	☒ Via WA State Courts' Portal ☐ Via First Class Mail ☒ Via Email ☐ Via Overnight Delivery

DATED THIS 28th day of July, 2022, at Yakima, Washington.

Janet L Rose

JANET L. ROSE

MENKE JACKSON BEYER, LLP

July 28, 2022 - 4:16 PM

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