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IN THE SUPREME COURT  
OF THE STATE OF WASHINGTON

No. 96781-4

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AMERICAN HOTEL & LODGING ASSOCIATION, SEATTLE HOTEL  
ASSOCIATION, and WASHINGTON HOSPITALITY ASSOCIATION,

Appellants,

v.

CITY OF SEATTLE,

Respondent,

and

UNITE HERE! LOCAL 8; SEATTLE PROTECTS WOMEN,

Respondent.

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**APPELLANTS AMERICAN HOTEL & LODGING ASSOCIATION,  
SEATTLE HOTEL ASSOCIATION, AND WASHINGTON  
HOSPITALITY ASSOCIATION'S ANSWER TO AMICUS BRIEFS  
OF STATE OF WASHINGTON AND NATIONAL EMPLOYMENT  
LAW PROJECT, ET AL.**

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## I. INTRODUCTION

The Attorney General asks this Court to water down the single subject rule to fast-track enactment of comprehensive legislation. Slow down. In a time when public faith in government is at record lows, it is especially important to uphold structural safeguards—like the single subject rule— that protect the integrity of our legislative process. The single subject rule is enshrined in both our State’s constitution and the Seattle Municipal Code: it is part of the bedrock of our system of government. It ensures that only laws supported by a majority of the legislators or voters make it onto the books; no unpopular law can ride through on the coattails of a popular one. The Court should reject a call to destabilize this core principle of our democracy in the interest of an easier legislative process.

The AG is right that the single subject rule makes it harder to solve complex problems in one fell swoop. A robust single subject rule means more work by interest groups and legislators to take on multifaceted problems, sometimes using bill packages instead of a single enactment. There is a natural appeal to more latitude in lawmaking. We want our legislators, interest groups, and our AG, to think big, and think creatively. Parsing out a complex legislative initiative into separate laws and marshaling support for each takes work. But it’s worth it. It adds integrity

to our laws, and our legislative process, and to government in general. It is also required. We must resist the urge to compromise now and pay for it later in public distrust driven by avoidable abuses of the legislative process.

The AG's brief does not support overturning the Court of Appeals' sound decision for three reasons. First, the brief mischaracterizes the Court of Appeals decision as imposing new requirements for compliance with the single subject rule. It does no such thing. The Court of Appeals faithfully and thoughtfully applies this Court's single subject jurisprudence, examining I-124 through the lens of a number of this Court's single subject rule decisions. An intermediate appellate court did its job by carefully examining the controlling law from this Court and applying it to the case before it. Nothing new here.

Second, the AG's brief is itself internally inconsistent. It acknowledges, as it must, that the single subject rule requires provisions within a law be rationally related both to the title, *and to each other*. Then it asserts the Court of Appeals should not have addressed the second part of the test. It says that the Court of Appeals' finding that the subparts of I-124 are "rationally related to the general subject of hotel employee working conditions" and may facilitate that general purpose "should have resulted, under this Court's precedent, in a conclusion that the measure

complied with the single-subject requirement.” AG Br. 16-17. That collapses the two inquiries into one. This Court has been clear: assessing rational unity *among* the provisions of a law is a *separate*, second inquiry.

Third, the AG’s brief argues that the Court of Appeals decision is a roadblock to comprehensive legislation necessary to solve complex problems. Not so. The single subject rule does not blockade comprehensive legislation; it merely requires bill packages when a legislative initiative includes multiple different laws that come at a problem from different angles. That is exactly what the Seattle City Council is considering while this appeal is ongoing: a legislative package based on I-124 but properly split into separate laws that must each receive majority approval to become law. The reaction to that bill package showcases the importance of the single subject rule: different views on the different laws that may drive different outcomes through the legislative process.

The amicus brief filed by the National Employment Law Project (“NELP”) and a number of individuals argues that the separate laws contained in I-124 are all important for hotel workers. But the brief fails to look at the laws through the lens of this Court’s single subject test. It also entirely fails to address how I-124’s blacklist provision—which

affects all hotel guests in Seattle—fits into an enactment otherwise largely regulating the employer-employee relationship for hotel workers.

## II. ARGUMENT

### A. The Court of Appeals Did Not Impose Additional Requirements for Compliance with the Single Subject Rule

The AG argues the Court of Appeals’ thoughtful application of this Court’s single subject jurisprudence represents a radical new approach that imposes new requirements for compliance with the rule. Not so. There is nothing new about how the Court of Appeals properly applied this Court’s single subject test.

The Court of Appeals appropriately started its analysis by determining whether the title of I-124 is general or restrictive. Slip op. at 10-11. After recognizing AHILA’s argument that I-124’s title contains some restrictive language, the Court of Appeals found that on the whole the title was general, and proceeded to apply this Court’s more lenient single subject test for laws with general titles. *Id.* When a title is general, the single subject rule requires two things: (1) that the provisions of a law are germane to the title; and (2) that the provisions are germane to one another. *City of Burien v. Kiga*, 144 Wn.2d 819, 825-26 (2001). The Court of Appeals properly considered both of these requirements. It concluded that I-124 met the first, but failed the second. In assessing

whether the provisions of I-124 are germane to one another, the Court of Appeals carefully considered this Court's numerous cases determining whether "rational unity" exists among the several matters addressed in a law. *See Kiga*, 144 Wn. 2d at 826.

The Court of Appeals held the provisions in I-124 are not all necessary to implementation of the others, which is one way this Court has assessed rational unity among the provisions of a law:

Part 1's sexual harassment provisions are not necessary to implement Part 2's hazardous chemical restrictions, or vice versa. Similarly, Part 3's requirements for medical insurance subsidies are not necessary to implement Part 1's sexual harassment protections, or vice versa. And Parts 1, 2, and 3 are not necessary to implement Part 4's seniority list and job security provisions.

Slip op. at 15 (citing *Amalgamated Transit*, 142 Wn.2d at 217); *see also*

Slip op. at 16-17. The Court of Appeals also found that I-124 lacks rational unity based on this Court's other approaches to the inquiry. *Id.* at 12-17.

The AG asserts that "the Court of Appeals added an additional requirement that the 'operative provision' of each subdivision have an additional purpose that must relate to the purpose of every other subdivision, beyond its relation to the general purpose of the measure as a whole." AG Br. at 17. That is not a new requirement. This Court has plainly and repeatedly held that to comply with the single subject rule a

law cannot contain two provisions with “two unrelated purposes.” *Lee v. State*, 185 Wn. 2d 608, 621 (2016) (citing *Amalgamated Transit Union Local 587 v. State*, 142 Wn.2d 183, 207 (2000)). This requirement comes directly from this Court’s single subject decisions. In *Amalgamated Transit*, this Court found that there was not rational unity between the two provisions in a law because they had unrelated purposes: one being to “specifically set license tab fees at \$30” and the other being “to provide a continuing method of approving all future tax increases.” 142 Wn.2d at 217.

In *Lee*, this Court reiterated that when a law contains multiple provisions the “key inquiry is whether the subjects are so unrelated that ‘it is impossible for the court to assess whether either subject would have received majority support if voted on separately.’” 185 Wn. 2d at 620 (quoting *Kiga*, 144 Wn.2d at 825). The Court applied this test to a law containing two subjects: (1) a reduction to the current sales tax rate; and (2) a change to the way all future tax increases are approved. *Id.* at 622. The Court rejected the argument that the two provisions both related to “taxes” or a general purpose of “fiscal restraint.” *Id.*

Contrary to the AG’s assertion, the Court of Appeals did nothing new by looking to the purposes of the various subparts of I-124 to assess rational unity. The Court of Appeals was simply applying this Court’s

single subject test when it found that I-124's main provisions had different, unrelated purposes: "protecting some employees from a guest's sexual assault or harassment has a different purpose than ensuring that all hotel employees maintain their jobs when a hotel changes ownership."

Slip op. at 15.

**B. The Single Subject Test Requires More Than Connecting Disparate Laws to a General Purpose Contained in the Title**

The AG tries to collapse the single subject rule into a single inquiry: do the provisions in a law serve the same general purpose set forth in the title. That is not how this Court construes the single subject rule, and for good reason. If the single subject rule only required different laws to fall under a general purpose, the rule would not serve its core purpose: to "prevent logrolling or pushing legislation through by attaching it to other legislation." *Amalgamated Transit*, 142 Wn.2d at 207.

The AG's brief acknowledges that this Court's single subject test has two requirements: "the relevant test is whether each subpart of a general measure is rationally related to the general purpose of the measure and to the other subparts." AG Br. at 14. However, the brief advocates that the two requirements should fold into one when a law contains a broad general purpose in its title. *Id.* at 16-17. It asserts that the Court of Appeals' finding that "each subdivision of I-124 was rationally related to

the general subject of hotel employee working conditions” and may facilitate that general purpose “should have resulted... in a conclusion that the measure complied with the single-subject requirement.” *Id.* The AG’s proposed approach would effectively eliminate the requirement that the provisions within a law have rational unity with each other.

The AG asserts that the “relevant question is whether each provision is rationally related to the others... [which] is satisfied where, as here, each provision shares a common objective.” *Id.* at 17. That is not how this Court assesses rational unity, because doing so would collapse the two part test into one, just as the AG’s brief does. The “common objective” the AG cites is simply a restatement of the title of I-124: “to positively impact working conditions of hotel employees.” *Id.* The AG’s framing of the single subject test would allow a law with wildly different subparts that loosely serve a common purpose in the title. The AG seems to accept the prospect of laws containing vastly different operative provisions, so long as the drafters intended a comprehensive enactment:

Of course, there will often be different operative provisions and purposes behind different subdivisions of a broad, comprehensive measure, but this Court has recognized that the people and legislative bodies have the prerogative to determine how comprehensive a measure will be.

*Id.* at 16. The AG’s brief suggests that drafters of legislation can obviate one of the two requirements of this Court’s single subject test—rational unity among a law’s subparts—simply by giving a law a broad title that expresses a general purpose that can be loosely connected to any number of different laws. The Court should not endorse that approach, which would undermine the single subject rule’s protection against logrolling. Drafters of legislation could choose a popular, broad general purpose as a title, like “a law concerning the general welfare of citizens,” and then hitch any number of unpopular laws unrelated to a popular one. If the AG and Respondents were right, *Amalgamated*, *Kiga*, and *Lee* would have been decided differently if someone had just thought to articulate the general purpose of “protecting the wallets of Washington residents.” But that is not enough. A measure’s separate provisions must be rationally related *to each other*. A “common objective,” even a noble one, is not enough.

The AG’s only support for a conflated single subject test is an ancient case, *Casco Co. v. Pub. Util. Dist. No. 1 of Thurston Cty.*, 37 Wn. 2d 777, 786 (1951), which this Court has not cited in *any* of its vast number of subsequent single subject rule cases. In *Casco*, the Court stated that to “constitute plurality of subject, an act must embrace two or more dissimilar and discordant subjects, that by no fair intendment can be considered as having any legitimate connection with or relation to each

other.” *Id.* at 790. If that were the current test, several of this Court’s cases would have come out differently, as noted above. The AG’s brief latches onto this dated articulation of the single subject rule from a case that gives no clarity as to how it should be applied. In the decades since *Casco*, through dozens of decisions, this Court’s single subject jurisprudence has become more robust. A case with no citations anywhere in the Court’s rich body of law in this area should not be where courts look to for the latest and greatest on the single subject rule. The Court of Appeals considered the many, more recent controlling cases at length and applied this Court’s approach to assessing whether a law has rational unity among its subparts. The Court should not look to a long-forgotten, inapposite decision from the 1950s as the AG’s amicus brief implores.

**C. The Single Subject Rule Does Not Prevent Comprehensive Legislation**

The central theme in the AG’s amicus brief is that the single subject rule makes it harder for “voters and elected legislative bodies ... to address complex issues through comprehensive legislation.” AG Br. at 1. That is true in the sense that some, but certainly not all, comprehensive legislation must be enacted as a bill package to comply with the single subject rule. Comprehensive laws that contain provisions that are germane to each other can be enacted together. Laws—like I-124—that

lack the requisite rational unity among the subparts have to be enacted separately.

Separate laws addressing different aspects of an industry or taking on an issue from different angles can be and often are enacted at the same time as part of a bill package. *See* AHLA Supp. Br. at 16-18. That is exactly what the Seattle City Council is in the process of trying to do with the goals of I-124 as a result of this litigation. In June of this year, a committee of the Seattle City Council held a meeting to consider a version of I-124 broken into four separate laws. *See* Agenda, Housing, Health, Energy and Workers' Rights Committee Special Meeting, June 27, 2019, *available at* <http://seattle.legistar.com/View.ashx?M=A&ID=708705&GUID=70DFF271-D2E0-41D3-83D0-363A9016FFF9> (committee agenda, containing links to the four proposed enactments that split up the different laws in I-124).

The response to these proposed separate laws has been different than for I-124, which improperly mashed them all together. For instance, on June 25, 2019, the American Civil Liberties Union sent a letter to the Seattle City Attorney and Mayor opposing the separate law that is patterned after the blacklist provision in I-124. *See* Appendix A. The ACLU likened the proposed blacklist provision banning hotel guests

accused of sexual harassment to a “no-fly” list. App. A at 2. The ACLU traced our country’s “troubling history with so-called ‘blacklists,’ dating back to the McCarthy era,” and asserted that this one would violate procedural due process protections. *Id.* at 1-5.

The response to this bill package version of I-124 showcases the additional challenges to enacting a set of laws separately, but also the importance of the single subject rule’s guarantee of separate votes for different laws. By splitting up the laws in I-124, constituents like those represented by the ACLU have the freedom to oppose the blacklist provision without opposing the other pieces of the bill package they may endorse. In contrast, I-124 put to Seattle voters a single yes-no on an initiative containing, among other laws, (1) a popular panic button law; (2) a gold level insurance mandate for a single industry; (3) a job security law; (4) the first ever blacklist law that requires hotels to punish accused guests without notice or an opportunity to be heard; and (5) a new private right of action for violations of workplace safety rules. It is absurd to expect that voters all feel the same about each of these disparate laws. Voters were deprived the opportunity to voice opinions, as the ACLU has now done, on any particular law within I-124.

I-124, with its mashup of separate laws, was whisked through on the popularity of panic buttons<sup>1</sup> in a way that compromises the integrity of the legislative process. The single subject rule has long protected transparency, precision, and honesty in our legislative process:

Forty-one state constitutions include a provision limiting legislation to a single subject. The theory behind these single subject rules—ensuring a transparent and focused legislative process—is as relevant today as it has ever been. ***The framers of these states’ constitutions intended the restriction to function as a mechanism through which to secure political accountability by keeping laws precise and lawmakers honest.***

Annie Melton, *Single Subject Rules and Civil Rights: Using Legislative-Process Restrictions to Facially Challenge Constitutionally Suspect Laws*, 27 J.L. & POL’Y 257, 258 (2018) (citations omitted). In a time when public trust in government is disturbingly low,<sup>2</sup> it is critical that the courts

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<sup>1</sup> See AHLA Supp. Br. at 12-16; Shawn D. Fabian, “Panic Button” Laws Make Their Way Across The U.S., NAT. L. REV., May 9, 2019.

<sup>2</sup> Trust and Distrust in America, PEW RESEARCH CENTER, July 22, 2019, <https://www.people-press.org/2019/07/22/trust-and-distrust-in-america/>. This distrust is most pronounced among lower income populations and those with less education. *Id.* The current public distrust of government comes after decades of slow erosion that has brought us to historic lows for the past decade. See Public Trust in Government, PEW RESEARCH CENTER, April 11, 2019, <https://www.people-press.org/2019/04/11/public-trust-in-government-1958-2019/>.

enforce structural protections like the single subject rule. The Court of Appeals' decision did not thwart the proper legislative process. Rather it prompted separate consideration by the Seattle City Council of the different laws in I-124. This second effort at comprehensive legislation affecting the hotel industry through a bill package should ensure that each of the separate laws enacted is supported by a majority of its voters or legislators.

**D. Laws That Serve the Same Constituency Cannot Always Be Enacted in a Single Vote**

The amicus brief filed by NELP (and a number of individuals) asserts that each of the laws in I-124 serve hotel workers. Maybe so, but that is not enough to satisfy the single subject rule. The Court's single subject test requires rational unity among laws for them to be enacted together. Many laws that serve a common constituency lack rational unity. Consider a number of laws affecting farmers: laws regulating chemical fertilizers, laws regulating the wages and hours of farm workers, laws regulating real estate taxes in farming communities, and laws funding roads serving farming communities all affect farmers. The laws all affect farmers, but the separate laws affect different other constituents: chemical manufacturers and distributors and nearby landowners affected by chemical fertilizers; farm workers and their families; landowners; and

drivers, passengers, and other residents of farming communities. The same with I-124, which contains laws affecting hotel workers by regulating the employer-employee relationship *and also* a blacklist that applies to hotel guests from Seattle and around the country. NELP's brief fails to assess I-124 through the lens of this Court's single subject jurisprudence. As discussed above and in AHLA's Supplemental Brief, through that lens, I-124 plainly fails the single subject rule.

NELP's brief also fails to identify *any* other hotel worker law that mandates hotels maintain and enforce a blacklist for guests accused of sexual harassment, let alone a blacklist as regressive as the one in I-124, which requires automatic punishment of accused guests without notice or an opportunity to clear their name. Seattle voters had a right to vote separately on such a controversial law. If the blacklist provision had been separate, we now have a sense of the opposition to it. Civil liberties advocates like the ACLU oppose that kind of law, which undermines the procedural due process rights of accused hotel guests. *See* App. A.

### **III. CONCLUSION**

The Court should affirm the Court of Appeals' sound finding that I-124 violates the single subject rule. The Court of Appeals applied this Court's single subject test and, contrary to the AG's suggestion, did not impose any new requirements. The AG's concern that the single subject

rule makes the legislative process more challenging should not change the result. The single subject rule is an important structural protection of the legislative process that helps ensure our laws had majority support.

RESPECTFULLY SUBMITTED this 3<sup>rd</sup> day of September, 2019.

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By /s/ Harry J. F. Korrell

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## CERTIFICATE OF SERVICE

The undersigned declares under the penalty of perjury under the laws of the State of Washington that I am now and at all times herein mentioned, a citizen of the United States, a resident of the state of Washington, over the age of eighteen years, not a party to or interested in the above-entitled action, and competent to be a witness herein.

On this date, I caused to be served in the manner noted below, a copy of the Appellants American Hotel & Lodging Association, Seattle Hotel Association, and Washington Hospitality Association's Answer to State of Washington's Amicus Brief on the following:

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