No. 91615-2

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

v.

ARLENE'S FLOWERS, INC., d/b/a/ ARLENE'S FLOWERS AND GIFTS, and BARRONELLE STUTZMAN,

Appellants.

INGERSOLL and FREED,

Respondents,

v.

ARLENE'S FLOWERS, INC., d/b/a/ ARLENE'S FLOWERS AND GIFTS, and BARRONELLE STUTZMAN,

Appellants.

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TABLE OF CONTENTS

TABLE OF AUTHORITIES iii

I. INTRODUCTION 1

II. ARGUMENT 2

A. *Masterpiece* condemns any government hostility toward religion. 2

1. *Masterpiece* constrains officials acting legislatively, executively, or judicially. 3

2. The Attorney General cannot excuse his unequal treatment of Bedlam Coffee and Mrs. Stutzman. 6

a. The Attorney General's Letters. 6

b. Consumer Complaints 8

c. Who the WLAD Protects. 8

d. The WLAD Liability Standards. 10

e. Offensiveness. 12

B. The hostility toward Mrs. Stutzman's religious beliefs permeates this entire litigation. 13

C. Respondents cannot force Mrs. Stutzman to personally participate in ceremonies like same-sex weddings. 15

D. The State may not compel Mrs. Stutzman to create artistic expression that she deems objectionable. 17

E. Forcing Mrs. Stutzman to create custom floral arrangements celebrating a same-sex wedding and to personally participate in that event triggers and fails strict scrutiny. 21

III. CONCLUSION 25

CERTIFICATE OF SERVICE 27

TABLE OF AUTHORITIES

***Cases*:**

Cantwell v. Connecticut,
310 U.S. 296, 60 S. Ct. 900, 84 L. Ed. 1213 (1940).....3

Church of the Lukumi Babalu Aye, Inc. v. Hialeah,
508 U.S. 520, 113 S. Ct. 2217, 124 L. Ed. 2d 472 (1993).....5

Hurley v. Irish-American Gay, Lesbian and Bisexual Group of Boston,
515 U.S. 557, 115 S. Ct. 2338, 132 L. Ed. 2d 487 (1995)..... 17-18, 22

Janus v. American Federation of State, County, & Municipal Employees, Council 31,
138 S. Ct. 2448, 201 L. Ed. 2d 924 (2018).....21

Kaahumanu v. Hawaii,
682 F.3d 789 (9th Cir. 2012) 21

Klein v. Oregon Bureau of Labor & Industries,
289 Or. App. 507, 410 P.3d 1051 (2017).....15

Lawrence v. Chater,
516 U.S. 163, 116 S. Ct. 604, 133 L. Ed. 2d 545 (1996)..... 5-6

Masterpiece Cakeshop, Ltd. v. Colorado Civil Rights Commission,
138 S. Ct. 1719, 201 L. Ed. 2d 35 (2018)..... *passim*

National Institute of Family & Life Advocates v. Becerra,
138 S. Ct. 2361, 201 L. Ed. 2d 835 (2018).....19, 21

New Jersey v. T.L.O.,
469 U.S. 325, 105 S. Ct. 733, 83 L. Ed. 2d 720 (1985).....3

New York Times Co. v. Sullivan,
376 U.S. 254, 84 S. Ct. 710, 11 L. Ed. 2d 686 (1964).....13

R.A.V. v. City of St. Paul,
505 U.S. 377, 112 S. Ct. 2538, 120 L. Ed. 2d 305 (1992).....22

Scrivener v. Clark College,
181 Wn.2d 439, 334 P.3d 541 (2014)..... 15-16

Thomas v. Review Board of Indiana Employment Security Division, 450 U.S. 707, 101 S. Ct. 1425, 67 L. Ed. 2d 624 (1981).....24

United States v. Playboy Entertainment Group, Inc., 529 U.S. 803, 120 S. Ct. 1878, 146 L. Ed. 2d 865 (2000).....24

West Virginia Board of Education v. Barnette, 319 U.S. 624, 63 S. Ct. 1178, 87 L. Ed. 1628 (1943).....4

***Constitutional Provisions and Statutes*:**

Colo. Rev. Stat. § 24-34-306(4).....5

RCW 19.86.080(1).....4

RCW 49.60.215 16

Wash. Const. Art. III, § 21 3-4

***Other Authorities*:**

Bedlam Coffee Video, Vimeo, https://vimeo.com/user40726072/review/292380783/0c7f9182eb.....9

Brief Regarding Rehearing En Banc, *Washington v. Trump*, 858 F.3d 1168 (9th Cir. 2017) (No. 17-35105), *available at* https://bit.ly/2D5553Q. 3

Press Conference Video (Feb. 17, 2017), https://bit.ly/2G9MOVT. ... 13-14

Oral Argument Video, *available at* https://bit.ly/2SP3aaj.....8, 19

Transcript of Oral Argument, *Masterpiece Cakeshop, Ltd. v. Colo. Civil Rights Comm'n*, 138 S. Ct. 1719 (2018), *available at* https://bit.ly/2BKvORw. 23-24

I. INTRODUCTION

The Free Exercise Clause forbids even "slight suspicion" of government hostility toward religion. *Masterpiece Cakeshop, Ltd. v. Colo. Civil Rights Comm'n*, 138 S. Ct. 1719, 1731, 201 L. Ed. 2d 35 (2018). Nothing about Respondents' hostility is slight. They initiated and waged a nearly six-year legal campaign against a 74 year-old grandmother and floral artist, Barronelle Stutzman, seeking to hold her personally liable for living out her faith after she politely declined to participate in and create custom floral arrangements celebrating a same-sex wedding. Meanwhile, the State declined even to investigate another business—Bedlam Coffee—that expelled a group of Christians while denigrating their faith in the process. The difference could be no greater; the hostility no starker.

Respondents try to excuse this hostility but to no avail. The Attorney General first claims an exemption from free-exercise scrutiny because he does not adjudicate. But free-exercise protection extends far beyond adjudicators—to all state actors who manifest hostility toward religion.

The State then attempts to differentiate the Bedlam Coffee situation from this case because Mrs. Stutzman did not accede to the State's demand that she must violate her conscience. But the Attorney General did not send a similar mandate to Bedlam Coffee. So the State's arguments actually establish—rather than dispel—its unequal treatment of Mrs. Stutzman.

The individual Respondents' arguments fare no better. They have inextricably linked their case to the State's and cannot separate it. Even now, they continue to reveal hostility by comparing Mrs. Stutzman's religious beliefs to those of slave owners and segregationists—the exact comparison that *Masterpiece* denounced. From this case's inception, Respondents have infused the process with hostility toward Mrs. Stutzman's beliefs. *Masterpiece* holds that such actions violate the First Amendment.

II. ARGUMENT

A. *Masterpiece* condemns any government hostility toward religion.

This case does not turn on whether business owners can *generally* deny access to goods and services to certain classes of people. *Contra* Att'y Gen. Resp. Br. ("A.G. Br.") 1; Ingersoll & Freed Resp. Br. ("I.F. Br.") 15. For her entire career, Mrs. Stutzman has served gays and lesbians, including the individual Respondents. CP 46-47, 537-38, 543-44. All that is at stake here is declining to design custom artistic expression celebrating same-sex marriages or to physically attend and participate in those weddings.

A key issue on remand is whether the State has "applied [its laws] in a manner that is neutral toward religion." *Masterpiece*, 138 S. Ct. at 1732. Respondents cannot hide behind general rules or subjective good intentions to make this showing. It is unconstitutional if any official "act[ed] in a

manner that passes judgment upon or presupposes the illegitimacy of [Mrs. Stutzman's] religious beliefs and practices." *Id.* at 1731.

1. *Masterpiece* constrains officials acting legislatively, executively, or judicially.

Respondents' chief argument is that *Masterpiece* applies only to adjudicators. A.G. Br. 11, 15, 17, 25-29; I.F. Br. 1, 11, 13. This troubling denial of responsibility cannot be taken seriously. The Free Exercise Clause governs state action of any kind. *Cantwell v. Connecticut*, 310 U.S. 296, 303, 60 S. Ct. 900, 84 L. Ed. 1213 (1940). The Attorney General can no more skirt the Free Exercise Clause because he is not a judge than a teacher can skirt the Fourth Amendment because he is not a police officer. *New Jersey v. T.L.O.*, 469 U.S. 325, 333-35, 105 S. Ct. 733, 83 L. Ed. 2d 720 (1985). For the Attorney General to argue that he can ignore free-exercise protections underscores his religious hostility. And his position undermines this Court's role. As the Attorney General said elsewhere, the executive's "assertion of 'unreviewable' authority is not unique to this litigation. But abdicating the courts' constitutional role would be."[1]

The Attorney General cannot deny that he has engaged in state action. He is the State's highest legal officer. His position was created by

[1] Brief Regarding Rehearing En Banc at 22, *Washington v. Trump*, 858 F.3d 1168 (9th Cir. 2017) (No. 17-35105), *available at* https://bit.ly/2D5553Q.

the Washington Constitution. Wash. Const. Art. III, § 21. And he brought this action "in the name of the state." RCW 19.86.080(1).

The Attorney General—like every litigant faced with a controlling legal decision—tries to limit *Masterpiece* to its facts. A.G. Br. 17. His arguments are unpersuasive for at least three reasons.

First, the *Masterpiece* opinion extends beyond adjudicators. While *Masterpiece* discussed agency adjudicators, the Court never limited its holding to them. It condemns any "signal of official disapproval of [Mrs. Stutzman's] religious beliefs" or any government "practice [that] disfavor[s] the religious basis of [her] objection." *Masterpiece*, 138 S. Ct. at 1731. It reminds "all officials" that "even [the] slight suspicion that proposals for state intervention stem from animosity to religion or distrust of its practices" is forbidden. *Id*. (citation omitted).

Masterpiece also noted "the State's duty under the First Amendment not to base laws or regulations on hostility to a religion or religious viewpoint." *Id.* That includes "the State or its officials" attempting to "prescribe what shall be offensive" to punish some citizens and excuse others. *Id.* Such disparate treatment by a government "'official, high or petty,'" violates the First Amendment. *Id.* (quoting *W. Va. Bd. of Educ. v. Barnette*, 319 U.S. 624, 642, 63 S. Ct. 1178, 87 L. Ed. 1628 (1943)). If these protections applied only to adjudicators, *Masterpiece* would have said so.

But it spoke of "the State" and of government "officials." That makes perfect sense because the First Amendment binds *all* state actors, irrespective of their function. Notably, the officials in *Masterpiece* were not just "adjudicators." They were also accusers, deciding to prosecute after a probable-cause finding, and issuing a complaint that led to a formal hearing. Colo. Rev. Stat. § 24-34-306(4). The Attorney General did the same here, filing a complaint against Mrs. Stutzman that resulted in a formal hearing.

Second**,** *Masterpiece*'s heavy reliance on *Church of the Lukumi Babalu Aye, Inc. v. Hialeah*, 508 U.S. 520, 113 S. Ct. 2217, 124 L. Ed. 2d 472 (1993), further demonstrates that its ruling reaches beyond adjudicators. *Lukumi* had nothing to do with adjudication. It was a challenge to two ordinances—clear legislative action. 508 U.S. at 528. Yet the *Masterpiece* majority grounded its ruling in *Lukumi*, quoting it at least five times and discussing it extensively. A First Amendment principle barring religious hostility in legislative (*Lukumi*) and judicial (*Masterpiece*) acts necessarily extends to executive acts, too.

Third**,** the U.S. Supreme Court would not have vacated this Court's prior decision and remanded if *Masterpiece* applied only to adjudication. That order means that *Masterpiece* "reveal[ed] a reasonable probability that [this Court's] decision [in Mrs. Stutzman's case] rests upon a premise that [this Court] would reject if given the opportunity for further consideration."

Lawrence v. Chater, 516 U.S. 163, 167, 116 S. Ct. 604, 133 L. Ed. 2d 545 (1996) (per curiam). Respondents' narrow reading of *Masterpiece* is wrong.

2. The Attorney General cannot excuse his unequal treatment of Bedlam Coffee and Mrs. Stutzman.

Religious objectors can prove free-exercise violations in different ways, including disparate treatment. *Masterpiece*, 138 S. Ct. at 1730-31. When enforcing Washington's public-accommodation law, the Attorney General treated Mrs. Stutzman differently than Bedlam Coffee. And the Attorney General's excuses fall flat.

a. The Attorney General's Letters. The Attorney General's main defense centers on the letter and Assurance of Discontinuance his office sent Mrs. Stutzman. A.G. Br. 6, 30-31, 35. The Attorney General paints that communication as benign, but it was not. The letter threatened to sue Mrs. Stutzman unless she agreed to celebrate same-sex marriage through her artistic expression or to stop designing wedding flowers altogether, even though no clearly established law required that. CP 1325-29. When Mrs. Stutzman refused to accede, the Attorney General carried out this threat by bypassing the Washington State Human Rights Commission, employing an unprecedented use of the CPA, and filing this suit. CP 1-5, 1503. And he sought penalties and fees against Mrs. Stutzman personally. CP 2, 4.

But when Bedlam Coffee's owner flagrantly violated the State's public-accommodation law by expelling a Christian group for expressing their religious beliefs *outside* his shop, the Attorney General did practically nothing. No letter threatening to sue. No Assurance of Discontinuance. No apparent concern that people of faith were denied their right to full enjoyment of a public accommodation by enduring a demeaning anti-religious rant and denial of service for their beliefs and associated conduct. The Attorney General merely sent a few form letters offering to informally mediate the dispute and stating that *others* thought Bedlam Coffee violated the State's public-accommodation law. *See, e.g.*, Appellants Mot. to Supplement Record, Ex. A at Mot.Supp.0005-08, 0025-28. When Bedlam Coffee's owner did not respond, the Attorney General did nothing.

As these actions show, the State views Christians like Mrs. Stutzman as foes to be prosecuted, not citizens to be protected. In Washington, those people of faith always lose. If they are creative professionals declining to celebrate same-sex marriage, the State deploys its full arsenal to punish them, even personally. If they are customers enjoying coffee, the State refuses to protect them. But the rules change for others. The State allows gay and lesbian proprietors like the Bedlam Coffee owner to reject Christians. And the state ensures that LGBT customers can force Christian creative professionals to create what the State concedes to be protected

expression. Oral Argument Video at 40:49-40:53, *available at* https://bit.ly/2SP3aaj. Only religious hostility explains the disparity.

b. Consumer Complaints. As another excuse, the Attorney General argues that he never received a complaint saying that Bedlam Coffee "has a policy of turning away customers based on their religion" or a complaint "from anyone who had been denied service at Bedlam Coffee." A.G. Br. 24, 34. But *no one* filed a complaint with the Attorney General against Mrs. Stutzman either. The Attorney General admits as much yet defends waging a nearly six-year legal campaign against her. A.G. Br. 30.

Only for Mrs. Stutzman does the State say it "often opens investigations and files enforcement actions without having first received a consumer complaint." *Id.* Meanwhile, the State refused to investigate, let alone sue, Bedlam Coffee even though the Attorney General's office received dozens of complaints from outraged citizens. *See* Appellants Mot. to Supplement Record, Ex. A at Mot.Supp.0004, 0011, 0024, 0041, 0044-88. The State's practice changes based on who is investigated and what that person believes. That is quintessential religious hostility.

c. Who the WLAD Protects. The Attorney General next contends that he did not investigate or prosecute Bedlam Coffee because there was "no clear evidence" that it discriminated "based on religion in violation of the WLAD." A.G. Br. 32. According to the State, same-sex marriage is

inextricably intertwined with sexual orientation, but Christians' religiously motivated pro-life speech is not inexorably tied to creed, *id.* at 32-33, even though the link between religion and pro-life views is well known and was recognized by Bedlam Coffee's owner.

If Mrs. Stutzman's religious objection to celebrating same-sex marriage is inextricably linked to sexual orientation, then the coffee shop owner's secular objection to Christians' faith-based speech is inexorably tied to Christianity. *Cf. Masterpiece*, 138 S. Ct. at 1736 (Gorsuch, J., concurring). In Mrs. Stutzman's case, the State advocated for a broad construction of the WLAD, interpreting it to ban acts even *indirectly* causing unequal treatment. Att'y Gen. Resp. Br. 10-11 (filed Dec. 23, 2015) ("A.G. 2015 Br."). But for Bedlam Coffee, the State claimed that the WLAD did not protect Christian customers even though the customers specifically mentioned Jesus Christ and Bedlam Coffee's owner attacked their faith by saying: "I'd f--k Christ in the a--, okay."[2] A.G. Br. 32-33.

The State's duplicity has an insidious effect. People of faith have less protection from discrimination under the WLAD (as in the Bedlam Coffee case), and they are subject to harsher enforcement under the WLAD (as in this case). Aggressively protecting the secular commitments of some

[2] Bedlam Coffee Video, Vimeo, https://vimeo.com/user40726072/review/292380783/0c7f9182eb.

while dismissing the religious convictions of Christians exemplifies not just disparate treatment but outright religious hostility. *Masterpiece* forbids the Attorney General from giving "some latitude" to Bedlam Coffee and none to Mrs. Stutzman. 138 S. Ct. at 1728.

d. The WLAD Liability Standards. The Attorney General's brief illustrates that the State changes its enforcement standards according to official sympathies. *Cf. Masterpiece*, 138 S. Ct. at 1730-31. In prosecuting Mrs. Stutzman, the State adopted and applied a strict-liability standard: any discriminatory impact on same-sex couples violates the WLAD. Mrs. Stutzman's decision not to celebrate same-sex marriage was wrong, and her longtime service of LGBT customers irrelevant. A.G. Br. 9; A.G. 2015 Br. 11-13. But for Bedlam Coffee's owner, the State considered the context and his state of mind and accepted his justifications. A.G. Br. 19-23, 31.

Simply put, the State presumed that Mrs. Stutzman illegally discriminated against same-sex couples based on the foreseeable effects of her conduct—that she could not create custom floral designs in one limited context. Yet the State reversed that presumption for Bedlam Coffee's owner even though the foreseeable effects of his conduct would leave groups of Christians unserved. This unequal treatment reflects a "negative normative 'evaluation of the particular justification' for [Mrs. Stutzman's] objection

and the religious grounds for it." *Masterpiece*, 138 S. Ct. at 1731 (citation omitted).

The double-standard continued when the Attorney General justified not prosecuting or even investigating Bedlam Coffee because the owner allegedly served the Christian group on other occasions. A.G. Br. 23, 32. But when Mrs. Stutzman pointed out that she served the individual Respondents for nearly a decade and would gladly do so again, the State dismissed her testimony as "irrelevant." A.G. 2015 Br. 12. One fact produces no investigation for Bedlam. The same fact produces a punitive legal campaign against Mrs. Stutzman.

The double-standard reappeared when the State treated Bedlam Coffee's ejection of Christians as the application of a neutral policy against serving "patrons that distribute threatening fliers targeted at children." A.G. Br. 33. Such a gerrymandered, post-hoc excuse based on objections wholly unrelated to serving beverages is not a "neutral principle[]," yet the State endorsed it anyway. *Id*. But when Mrs. Stutzman explained that she will not create custom floral arrangements celebrating same-sex marriage *for anyone*, the State labeled her neutral policy "irrelevant." A.G. 2015 Br. 12.

In short, the State has gamed the system. It ignores Bedlam Coffee's mental state, but not Mrs. Stutzman's. It cites a general willingness to serve a protected class to exonerate Bedlam Coffee, but not Mrs. Stutzman. And

it defers to a supposedly neutral policy of Bedlam Coffee, but not Mrs. Stutzman. Throughout, the State fails to apply a "consistent legal rule." *Masterpiece*, 138 S. Ct. at 1736 (Gorsuch, J., concurring). But officials may not pick a different "standard to suit [their] tastes depending on [their] sympathies." *Id.* at 1737 (Gorsuch, J., concurring). By doing so here, by considering Bedlam Coffee's "conscience-based objections as legitimate, but treat[ing] [Mrs. Stutzman's] as illegitimate," the State sat "in judgment of [Mrs. Stutzman's] religious believes themselves." *Id.* at 1730. *Masterpiece* declares such conduct unconstitutional.

e. Offensiveness. Officials cannot apply public-accommodation laws based on their "assessment of offensiveness." *Masterpiece* 138 S. Ct. at 1731. But the State did that here. Not enforcing the WLAD against Bedlam Coffee was appropriate, the State says, because the shop expelled a group whose speech—distributed elsewhere—was "threatening," "creepy," "repulsive," "garbage," "ugly crap," or "[t]rying to stir up hate." A.G. Br. 19, 22-23, 31-33. The State deemed the Christian group's speech offensive—or at least credited Bedlam Coffee's owner's perception that it was offensive—and allowed the shop to expel its customers.

In contrast, the State ignored Mrs. Stutzman's sincere plea that it would offend her faith to create custom artistic expression celebrating same-sex marriage. The State does not consider celebrating same-sex weddings

offensive. It is only when same-sex couples face religious disagreement that the State finds something offensive. A.G. Br. 4. That led the State to punish Mrs. Stutzman based on the rule that "even religiously motivated discrimination is still discrimination and can be prohibited" A.G. 36, while allowing secularly motivated discrimination against Christians to go unchecked. *Masterpiece* condemns this disparate treatment.

B. The hostility toward Mrs. Stutzman's religious beliefs permeates this entire litigation.

Turning from the State to the individual Respondents, they argue that the Free Exercise Clause does "not apply to private individuals" and so state hostility "has no bearing" on their lawsuit. I.F. Br. 14. But this ignores that the individual Respondents can sue Mrs. Stutzman only because state statutes allow it. *New York Times Co. v. Sullivan*, 376 U.S. 254, 265, 84 S. Ct. 710, 11 L. Ed. 2d 686 (1964) (allowing party to invoke First Amendment defense in civil action brought by private party). By invoking these statutes and using the same religiously hostile arguments as the Attorney General, the individual Respondents' suit also violates free-exercise guarantees.

The individual Respondents' argument also ignores how they and the State jointly coordinated, briefed, and argued this case at every stage. The Attorney General and counsel for the individual Respondents publicly proclaimed their "wonderful partnership . . . all the way through this case,"

their significant "communication" regarding strategy, their "great working relationship . . . all along the way," and their efforts to work "very closely together . . . throughout the process," including moot courts where they formulated joint strategies. Press Conference Video at 0:23-0:26, 0:42-0:50, 6:14-6:18, 7:06-7:10, 9:21-9:37 (Feb. 17, 2017), https://bit.ly/2G9MOVT. In light of this close relationship, the individual Respondents' actions cannot be isolated or insulated from the Attorney General's hostility.

Nor can the individual Respondents credibly suggest that the State's religious hostility never affected the trial court's or this Court's rulings. Both opinions jointly considered and decided the State's and the individual Respondents' claims. In these circumstances, quarantining the Attorney General's hostility is impossible. *Masterpiece* illustrates the point. It requires religious neutrality "in all of the circumstances in which [Mrs. Stutzman's] case was presented, considered, and decided," and that neutrality was lacking here. 138 S. Ct. at 1732. The trial court's and this Court's orders must be set aside just as in *Masterpiece*, which involved the synchronized presentation and consideration of arguments made by the State of Colorado and the separately represented same-sex couple. *Id*.

C. Respondents cannot force Mrs. Stutzman to personally participate in ceremonies like same-sex weddings.

Masterpiece, along with many other cases, forbids the State from compelling someone to personally participate in same-sex wedding celebrations contrary to their religion. Respondents do not deny this. They instead say participation is not at issue. That is wrong for three reasons.

First, the record, construed in the light most favorable to Mrs. Stutzman, establishes that she declined to personally participate in—that is, provide full wedding support for—Mr. Ingersoll's wedding. CP 544-46. To be sure, Mr. Ingersoll testified after the fact that he wanted only sticks or twigs. A.G. 40; I.F. Br. 4-5. But he never asked Mrs. Stutzman for sticks or twigs, which she would have provided. CP 544, 546. Her decision turned on the details as she understood them; it was not a categorical denial.

This fact holds even though some of Mrs. Stutzman's customers do not request full wedding support. A.G. 40; I.F. Br. 4-5. The proper focus is what "a long time customer" like *Mr. Ingersoll* "typically asks for" and what Mrs. Stutzman declined to provide to him—"full wedding support." CP 544. *See Klein v. Oregon Bureau of Labor & Indus.*, 289 Or. App. 507, 537, 410 P.3d 1051, 1071 (2017) (focusing on cake designer's "customary practice" to determine what was requested). Customary practices and Mrs. Stutzman's testimony are decisive, particularly because this Court must

"consider all facts and make all reasonable factual inferences in the light most favorable to the nonmoving party." *Scrivener v. Clark Coll.*, 181 Wn.2d 439, 444, 334 P.3d 541 (2014).

Second, Respondents put participation at the center of this case by seeking—and obtaining—injunctive relief. Because Mr. Ingersoll's request is past, the injunction is justified only by Respondents challenge to Mrs. Stutzman's policy on full wedding support for *future* same-sex weddings. CP 546-47. Respondents even invoked this policy below to justify an injunction. CP 2330. Respondents cannot invoke the policy to justify injunctive relief and now claim that full wedding support is irrelevant.

Third, the injunction below compels full wedding support because it requires Mrs. Stutzman to provide "*[a]ll* goods, merchandise, and services offered or sold" for same-sex weddings "on the same terms." CP 2420 (emphasis added). Respondents' attempt to limit this language to services sold separately is unpersuasive. A.G. Br. 40-41. For one thing, Mrs. Stutzman charges separately for participating in weddings. CP 1589-90. In addition, the injunction covers services "offered," not just "sold." This tracks the WLAD, which forbids "any distinction" in services offered, whether sold separately or bundled. RCW 49.60.215. To say otherwise would let businesses decline any service—everything from food delivery to valet parking—for which there was not a separate charge. But this Court

has not interpreted the WLAD that way. Nor does the injunction make this distinction. Rather, the injunction—like the law it effectuates—enjoins Mrs. Stutzman's full-wedding-support policy and thereby forces her to personally participate in same-sex weddings unless she abandons that wedding work. This case thus involves compelled participation, which the Free Exercise Clause forbids.

D. The State may not compel Mrs. Stutzman to create artistic expression that she deems objectionable.

Religious objections like Mrs. Stutzman's are "in some instances protected forms of expression." *Masterpiece*, 138 S. Ct. at 1727. Ignoring this, Respondents say that *Masterpiece* avoided free-speech issues yet somehow supports all their free-speech arguments. A.G. Br. 42. This contradictory position is flawed. Although *Masterpiece* ruled on free-exercise grounds, its logic supports Mrs. Stutzman's argument (1) that while states may lawfully apply public-accommodation laws in countless instances, they may not use them to compel artistic expression, and (2) that this analysis turns on the expressive nature of what Mrs. Stutzman creates.

Through its citation to *Hurley v. Irish-American Gay, Lesbian and Bisexual Group of Boston*, 515 U.S. 557, 572, 115 S. Ct. 2338, 132 L. Ed. 2d 487 (1995), *Masterpiece* affirmed that the First Amendment bars states from applying public-accommodation laws to compel expression. 138 S. Ct.

at 1727. Respondents try to limit *Hurley* to nonprofit groups, saying that only such a "peculiar" application of the law is forbidden. A.G. Br. 44-45; I.F. Br. 16. But public-accommodation laws often apply beyond businesses to "other actors in the economy and in society." *Masterpiece,* 138 S. Ct. at 1727. So there is nothing peculiar about these laws applying to nonprofits. The "peculiar" application that *Hurley* condemned was to "speech itself," 515 U.S. at 572-73—something that both nonprofits and businesses do.

Masterpiece recognizes that protecting business owners who create speech may be appropriate if that protection does not allow "all purveyors" to decline to *sell* all goods and services for same-sex weddings. *Id*. at 1728-29. This fits Mrs. Stutzman's arguments perfectly. She will sell sticks and twigs and countless other premade items for same-sex weddings. What she cannot do is create *custom* arrangements celebrating those ceremonies.

That *Masterpiece* approved public-accommodation laws generally does not mean that they are a blank check the State may use to compel the hand of artists. *Contra* A.G. Br. 42; I.F. Br. 17 (arguing that the "potentially expressive nature of a flower arrangement [is] irrelevant"). Laws may be valid in most applications, but unconstitutional in some. Mrs. Stutzman's arguments recognize this. She has not tried to facially invalidate the WLAD or argued for a broad exception protecting everything expressive businesses do. Her speech arguments only forbid applying public-accommodation laws

to compel expression, whether parades, poems, or custom floral arrangements. *Contra* Oral Argument Video at 41:36-42:12, *available at* https://bit.ly/2SP3aaj (the State argued that it may use the WLAD to compel poets to write poems celebrating a particular message).

This belies Respondents' near-apocalyptic fear of allowing extensive discrimination, creating unbounded exceptions, and overturning 140 years of case law. A.G. Br. 42; I.F. Br. 18-21. Mrs. Stutzman's actual compelled-speech argument is narrow. It protects only speech, not conduct (e.g., catering or bartending)—a line "long drawn" by precedent and "long familiar to the bar." *Nat'l Inst. of Family & Life Advocates v. Becerra*, 138 S. Ct. 2361, 2373, 201 L. Ed. 2d 835 (2018) (*NIFLA*). That argument is not broad because there are "innumerable goods and services that no one could argue implicate the First Amendment." *Masterpiece*, 138 S. Ct. at 1728. And it protects only objections to conveying messages, not categorical denials of service to classes of people. *Id*. at 1723 (separating an inability to create "images celebrating [same-sex] marriage" from "a refusal to sell any cake at all"). The only speech argument that gained no traction in *Masterpiece* was Respondents'—that the First Amendment imposes no limit on governments that use public-accommodation laws to compel business owners to create custom artistic expression.

Next, *Masterpiece* shows that free-speech analysis focuses on the final creation (e.g., wedding cakes or floral arrangements), not the act of selling or creating speech. Arlene's Br. 37. Denying this, the State isolates a line from *Masterpiece* where the Court said that "few" people would think that wedding cakes are speech. A.G. Br. 43. But *Masterpiece*'s very next sentence affirms that "new contexts can deepen our understanding of" what speech is. 138 S. Ct. at 1723. Either way, *Masterpiece* focused on the end product, not the act of selling or creating.

Undeterred, the State tries to reinterpret this Court's earlier decision as focusing on floral arrangements. A.G. Br. 43. But not even the individual Respondents buy this. As they note, this Court "found that the regulated activity here is the sale of floral arrangements, not the arranging of flowers." I.F. Br. 17. That characterization is accurate and conflicts with *Masterpiece*.

Focusing on Mrs. Stutzman's final custom creations also undermines reliance on third-party perceptions. The issue is whether her arrangements convey a message that she deems objectionable. It is irrelevant whether bystanders think she endorses any message. Rejecting this, Respondents deny that Mrs. Stutzman engages in expression at all since she creates arrangements for religious couples without endorsing their religion. A.G. 44; I.F. Br. 17. But this conflates separate issues. All Mrs. Stutzman's custom wedding arrangements inherently convey celebratory

messages about the marriage. They do not necessarily say anything about the couple's religion. *Kaahumanu v. Hawaii*, 682 F.3d 789, 799 (9th Cir. 2012) (a wedding's message is "celebration of marriage and the uniting of two people in a committed long-term relationship."); CP 607.

No matter what Respondents say, the doctrine is compelled expression, not compelled endorsement. No one seeing the abortion notice in *NIFLA* would think pro-life pregnancy centers endorsed that message. 138 S. Ct. at 2371-76. And no one in *Janus v. American Federation of State, County, & Municipal Employees* would think objecting state employees compelled to pay union dues endorsed their union's speech. 138 S. Ct. 2448, 2463-65, 201 L. Ed. 2d 924 (2018). But these cases still found First Amendment violations. Respondents dismiss them as outside the public-accommodation context. A.G. Br. 45; I.F. Br. 16. But that is like saying *Hurley* applies only to parades or *Barnette* only to pledges. These cases' logic extends beyond their precise facts and protects speakers engaged in different mediums of communication, including Mrs. Stutzman's.

E. Forcing Mrs. Stutzman to create custom floral arrangements celebrating a same-sex wedding and to personally participate in that event triggers and fails strict scrutiny.

Laws trigger strict scrutiny when they compel speech, regulate speech in content-based ways, or compel participation in sacred events like wedding ceremonies. Arlene's Br. 25-32, 42-43. Mrs. Stutzman has shown

why the first and last points apply here. So does the second because the State is forcing her to celebrate particular content—same-sex marriage.

In response, Respondents defend their injunction as content neutral because it requires equal access without mentioning speech or any specific service. A.G. Br. 48-49. But that does not matter. The law in *Hurley* did not mention parades and did not, "on its face, target speech or discriminate on the basis of its content"; it forbade "the act of discriminating" yet still regulated speech based on content. 515 U.S. at 572. The same is true of Respondents' injunction. It does not require Mrs. Stutzman to create flowers celebrating every event, just same-sex weddings. She can avoid it only if she stops creating arrangements celebrating opposite-sex weddings, not other events. So the injunction is triggered by certain content and mandates speech addressing certain content. That is a content-based application of the law. And it triggers strict scrutiny.[3]

Respondents cannot satisfy this standard. They repeat their mantra of needing to stop discrimination generally. A.G. Br. 46-47; I.F. Br. 18-21. But *Masterpiece* recognized that refusing to sell goods to an entire class is

[3] Respondents try to distinguish *R.A.V. v. City of St. Paul* because it confronted a law regulating speech. 505 U.S. 377, 112 S. Ct. 2538, 120 L. Ed. 2d 305 (1992); A.G. Br. 49. That is not quite true. The law there regulated *unprotected* speech (fighting words), which is just like conduct.

not the same as declining to create a particular piece of artistic expression. 138 S. Ct. at 1728. Stopping the former does not justify compelling the later.

This explains why certain remarks that Respondents pull from *Masterpiece* do not establish strict scrutiny. *See* A.G. Br. 47-48; I.F. Br. 15. Those statements simply stressed the importance of ensuring general access to services and warned about allowing religious objections to overcome public-accommodation laws as "a general rule." 138 S. Ct. at 1727. That general rule does not apply to the rare situation when someone is compelled to create custom artistic expression or to personally participate in weddings. Indeed, Justices Thomas and Gorsuch would not have joined the majority opinion in *Masterpiece* if it contradicted their concurrence's view that Colorado compelled speech in violation of the First Amendment.

Even ignoring *Masterpiece*, Respondents have undermined their own alleged interests. As noted, the State cannot compel Mrs. Stutzman to create artistic expression when it allows Bedlam Coffee to discriminate. Arlene's Br. 45 n.15. The State has no response to that. Likewise, forcing people to participate in weddings is so egregious that Respondents do not even defend it. In fact, counsel for the individual Respondents—the same organization that represented the respondents in *Masterpiece*—conceded to the U.S. Supreme Court that compelling "physical participation in . . . a religious ceremony" like a same-sex wedding is problematic. Transcript of

Oral Argument at 77-78, *Masterpiece Cakeshop, Ltd. v. Colo. Civil Rights Comm'n*, 138 S. Ct. 1719 (2018), *available at* https://bit.ly/2BKvORw.

At bottom, Respondents' only strict-scrutiny argument is their slippery slope one—that protecting Mrs. Stutzman will cause widespread discrimination. A.G. Br. 46-47; I.F. Br. 18-21. But Respondents carry the burden to justify this fear, and they have failed to do so. They offer "supposition" and nothing more. *United States v. Playboy Entm't Grp., Inc.*, 529 U.S. 803, 822-23, 120 S. Ct. 1878, 146 L. Ed. 2d 865 (2000); *Thomas v. Review Bd. of Ind. Emp't Sec. Div.*, 450 U.S. 707, 719, 101 S. Ct. 1425, 67 L. Ed. 2d 624 (1981) (noting the lack of "evidence in the record" to suggest that a religious accommodation would create widespread concerns). Not only has Mrs. Stutzman explained why her compelled-expression argument is limited, Respondents failed to identify another paid artist in Washington who has declined to celebrate same-sex weddings, and they point to only a few other instances nationwide. I.F. Br. 19.

Critically, Respondents' arguments ignore that Mrs. Stutzman's constitutional interests are particularly strong, and the State's enforcement interests are especially weak, in this context involving (1) the creation of art celebrating weddings and (2) personal participation in those ceremonies—events with deep spiritual significance for countless people. This case is thus far easier than some that might arise outside the wedding context.

Respondents finally resort to guilt by (unrelated) association, equating Mrs. Stutzman's religious beliefs to objections to interracial marriage, defenses of slavery, housing discrimination, and racial discrimination in education, among other things. I.F. Br. 19-21. Respondents never explain what all that has to do with politely declining to create artistic expression for, or declining to personally participate in, a wedding ceremony. Nor do they explain how the law's protection of Mrs. Stutzman will lead to these things.

Respondents do make one thing crystal clear: they consider Mrs. Stutzman's religious beliefs reprehensible, yet again invoking racism and slavery as comparators. But stamping out religious beliefs that the State regards as odious is not a compelling interest. It is the precise type of religious hostility that *Masterpiece* denounced. *Compare* I.F. Br. 20 ("From the earliest days, religion was used to justify slavery"), *with Masterpiece*, 138 S. Ct. at 1729 (denouncing official's remark that "religion has been used to justify all kinds of discrimination," including "slavery").

III. CONCLUSION

Masterpiece condemns religious hostility by government officials no matter the context. This Court should adhere to *Masterpiece* and reverse the Superior Court's judgment.

Respectfully submitted this the 13th day of February, 2019.

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