CERTIFICATE OF SERVICE-AMICUS CURIAE BRIEF
Washington State Supreme Court 91615-2

I certify, under penalty of perjury under the laws of the state of Washington, that I served, via electronic mail, a true and correct copy of the *AMICUS CURIAE* BRIEF OF PROTECTING CONSTITUTIONAL FREEDOMS INC., upon the following:

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DATED this 2Nd day of February 2016, at Kennewick, Washington.

CERTIFICATE OF SERVICE – MOTION TO FILE AMICUS CURIAE BRIEF
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DATED this 2Nd day of February 2016, at Kennewick, Washington.

Supreme Court No. 91615-2

SUPREME COURT OF THE STATE OF WASHINGTON

ROBERT INGERSOLL, et al. Plaintiffs-Respondents,

v.

ARLENE FLOWERS, INC., et al. Defendants-Appellants.

STATE OF WASHINGTON Plaintiff-Respondent,

v.

ARLENE FLOWERS, INC., et al. Defendants-Appellants.

AMICUS CURIAE BRIEF OF PROTECTING CONSTITUTIONAL FREEDOMS INC.

PROTECTING CONSTITUTIONAL FREEDOMS INC.

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CASES

STATUTES

I. INTEREST OF *AMICUS CURIAE*

Rights and Freedoms guaranteed to citizens by the constitutions of states and the Federal Government are frequently challenged. Protecting these rights and freedoms is the interest of *AMICUS.CURIAE*.

II. ISSUES TO BE ADDRESSED BY *AMICUS CURIAE*

III. STATEMENT OF THE CASE

Defendants sold flowers to an unmarried same-sex couple but refused, as the exercise of Religion, to provide services for their wedding. The Court denied constitutional scrutiny of the refusal, denied CPA and WLAD examination of the "unfairness" of the refusal and held that the refusal was sexual-orientation discrimination.

IV. ARGUMENT

A. The Constitutional Freedoms realized by citizens distinguish the United States and the States within the many nations on earth. The Rights and Freedoms are fundamental to liberty. Our Courts seek to and must insure that the citizens realize these rights and freedoms.

"No Issue is More Fundamental to American Liberty Than Freedom of Religion…Our Nation's Founders Cherished Religious Independence…: Our Founders Were Wise Enough to Know if They Imposed Their Religious Beliefs Onto Others, One Day, Religious Beliefs of Others Could be Imposed Upon Them. Freedom From Government Interference, an Essential Component of the Protection of Religious Liberty, can be Guaranteed Only by Imposing Absolute Neutrality in Religious Matters Upon the State." Justice Chambers dissenting in *State ex rel. Gallwey v. Grimm*, 48 P.3d 274,146 Wn.2d 445, 487 (Wash. 2002)

B. The Individual Plaintiffs correctly identify the existence of "Religious People" in these many states but the Individual Plaintiffs join the Attorney General (AG) and the Trial Court in fundamentally failing to comprehend the distinction between Religious Doctrine and personal preference/prejudice.

1. The Court fundamentally fails to correctly analyze the constitutional freedom to exercise Religious Rights of the Defendants relative to statutory rights of the Individual Plaintiffs: the AG, Individual Plaintiffs and the Trial Court ignore the Washington Courts' method of determining if an act in business was unfair as required by the Consumer Protection Act (CPA) and for the Washington Law Against Discrimination (WLAD).

2. The Trial Court confirmed that Defendant's religious beliefs were Christian which restricted marriage to that of a man and a woman and which were set forth in the Resolutions of the Southern Baptist Convention (SBC)which specifically excluded same-sex marriage.[1]

3. Ms. Stutzman told Defendant Ingersoll that she couldn't do his wedding because of her relationship with Jesus Christ.[2] It is certain that the Trial Court knew that Defendant's refusal to serve customer Ingersoll at his wedding was based on her Christian Religious Beliefs, that her church was affiliated with the SBC which resolved that marriage was only between a man and a woman and that her beliefs and the tenants of the SBC were based on the Holy Bible[3].

4. With marked awareness of Ms. Stutzman's assertion that her refusal was the exercise of her Religious Beliefs, the AG asserted that Mrs. Stutzman's acts were unfair for the WLAD[4]:

a. The AG states that Washington courts have found an act or practice "unfair" under the CPA where the defendant's conduct:

"offends public policy, as it has been established by statutes,

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1 Memorandum Decision 6.
2 Id, 7.
3 fn5 of Memorandum Decision identifying the Declaration of Professor David Burk. Dr. Burk's Declaration is summarized Brief of Appellants 7-8.
4 AG's Response Brief 19

the common law, or otherwise" or is "immoral, unethical, oppressive, or unscrupulous . . . ." *Blake v. Fed. Way Cycle Ctr*., 40 Wn. App. 302, 310, 698 P.2d 578 (1985) (quoting *Fed. Trade Comm'n v. Sperry & Hutchinson Co*., 405 U.S. 233, 244 n.5, 92 S. Ct. 898, 31 L. Ed. 2d 170 (1972))

b. The AG's reference to *Klem v. Washington Mutual Bank,* 295 P.3d 1179, 176 Wn.2d 771 (Wash. 2013) and cite to *Blake* at 310 leaves suspect[5] the AG's failure to bring the Trial Court's focus on *Blake* at 310-11 where the analysis formulated by the Federal Trade Commission is found. *Blake* at 311 provides a detailed analysis to determine if an act is "unfair" for CPA and WLAD needs.

5. With certainty of Ms. Stutzman's assertion that her refusal was the exercise of her Religious Beliefs, the AG inferred that Mrs. Stutzman's acts "offended public policy and/or were immoral, unethical, oppressive, or unscrupulous[6].

a. The Trial Court confirmed that Defendant Stutzman's religious beliefs were Christian which restricted marriage to that of a man and a woman and which were set forth in the Resolutions of the Southern Baptist Convention (SBC)which

[5] RPC 3.3 burdens counsel to disclose pertinent legal authority to the tribunal.
[6] AG's Response Brief 19

specifically excluded same-sex marriage.[7] Ms. Stutzman told Defendant Ingersoll that she couldn't do his wedding because of her relationship with Jesus Christ.[8] It is certain that the Trial Court knew that Defendant Stutzman's refusal to serve customer Ingersoll at his wedding was based on her Christian Religious Beliefs, that her church was affiliated with the SBC which resolved that marriage was only between a man and a woman and that her beliefs and the tenants of the SBC were based on the Holy Bible[9].

2. With marked awareness of Ms. Stutzman's assertion that her refusal was the exercise of her Religious Beliefs, the AG stated[10]:

a. The AG states that Washington courts have found an act or practice:

"unfair" under the CPA where the defendant's conduct "offends public policy, as it has been established by statutes, the common law, or otherwise" or is "immoral, unethical, oppressive, or unscrupulous . . . ." *Blake,* supra310 (quoting *Fed. Trade Comm'n v. Sperry,*supra)

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[7] Memorandum Decision 6.

[8] Id, 7.

[9] fn5 of Memorandum Decision identifying the Declaration of Professor David Burk. Dr. Burk's Declaration is summarized Brief of Appellants 7-8.

[10] AG's Response Brief 19

The AG's reference to *Klem v. Washington Mutual Bank,* 295 P.3d 1179, 176 Wn.2d 771 (Wash. 2013) and cite to *Blake* at 310 leaves suspect[11] the AG's failure to bring the Trial Court's focus on *Blake* at 310-11 where the analysis formulated by the Federal Trade Commission is found. *Blake* at 311 provides a detailed analysis to determine if an act is "unfair" for CPA and WLAD needs.

3. With certainty of Ms. Stutzman's assertion that her refusal was the exercise of her Religious Beliefs, the AG stated[12]:

a. The AG states that Washington courts have found an act or practice:

> "unfair" where the defendant's conduct "offends public policy…or is "immoral, unethical, oppressive, or unscrupulous . . . ." *Blake v. Fed. Way Cycle Ctr*., 40 Wn. App. 302, 310, 698 P.2d 578 (1985) (quoting *Fed. Trade Comm'n v. Sperry*, supra.

Which adjective(s) in the *Blake* phrase "…conduct "offends public policy…,or is "immoral, unethical, oppressive, or unscrupulous . . . ." that apply are not revealed. The Plaintiffs and Court, may so believe, however, this would

[11] RPC 3.3 burdens counsel to disclose pertinent legal authority to the tribunal.

seem to be unlikely since millions throughout the world, and in the State of Washington cherish this belief. Can such be the understanding here? Probably not.

But that issue had to be avoided and that could only be accomplished by *simply* concluding that Mrs. Stutzman's act was not Exercise but was discrimination. Why did she wait?

A trier of fact could have: 1. required the Plaintiffs to consider the potential for the triggering of a culture war exceeding that related to abortion: 2. Required the parties to realize that many, in circumstances distant from a public accommodation, will be ridiculed and experience hurt feelings. *Amicus* is unaware of the record regarding the problem of humiliation but *Amicus* is aware that that many religions will not admit to membership those who are in same-sex relationships or marriages. The Court is requested to take Judicial Notice of this fact.

It is without doubt that the Plaintiffs and Trial Court considered the analysis in *Blake,* supra, and in additional cases, regarding "unfair" and how it is determined for the

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[12] AG's Response Brief 19

CPA and WLAD. They also recognized the hazard of that analysis. Hence, the Trial Court's non-sequitur conclusion "…that to accept any [of] the Defendants' arguments would be to disregard well-settled law….[13]"

C. Mrs. Stutzman's refusal to serve at Plaintiffs' wedding requires the refusal to be an "unfair" act in commerce.

> Although the Consumer Protection Act does not define the term "unfair," the Supreme Court has held that in order to be unfair…, conduct must have a tendency or capacity to deceive a substantial portion of the public. *Blake*, infra at 310-11; *Haner*, 97 Wash.2d at 759, 649 P.2d 828. If a defendant's act or practice is not per se unfair,,,, the plaintiff must show the conduct is " unfair" or " deceptive" under a case-specific analysis of those terms.

The Court notes "We must liberally construe the CPA to serve its beneficial purposes and may look to federal law for guidance in doing so. RCW 19.86.920. Our Supreme Court has suggested a defendant's act or practice might be " unfair" if it " 'causes or is likely to cause substantial injury to

[13] Memorandum Decision 5.

consumers which is not reasonably avoidable by consumers themselves and not outweighed by countervailing benefits." *Mellon v. Regional Trustee Services Corp.*, 334 P.3d 1120, 182 Wn.App. 476, 489-90 (Wash.App. Div. 3 2014); *See Klem*, *supra*, at 786-87 (quoting 15 U.S.C. § 45(n)). Similarly, a defendant's act or practice might be " unfair" if it " offends public policy as established 'by statutes [or] the common law,' or is 'unethical, oppressive, or unscrupulous,' among other things."; see Fed. Trade Comm'n, supra.

The Consumer Protection Act (CPA) identifies sources to which Washington courts should look for guidance in construing its provisions. Among these are federal court interpretations of federal statutes dealing with matters similar to those involved in the Consumer Protection Act. RCW 19.86.920; see Short v. Demopolis, 103 Wash.2d 52, 56, 691 P.2d 163 (1984).

In enacting the CPA, the Washington legislature made clear its intent for Washington courts to be guided by federal court and Federal Trade Commission…" *State v. LG Elecs., Inc.*, 340 P.3d 915, 185 Wn.App. 123, 133-34 (Wash.App.

Div. 1 2014) with guidance from Federal Statute 15 U.S.C. 45(a) and

citing Blake, supra, and Klem, supra commenting 15 U.S.C. 45(n) - Current federal law suggests that a "practice is unfair

[if it] causes or is likely to cause substantial injury to consumers which is not reasonably avoidable by consumers themselves and not outweighed by countervailing benefits." Federal Trade Commission Act of 1914, 15 U.S.C. § 45(n) (quoted in Klem, 176 Wn.2d at 787).

The Statute provides as follows;

15 U.S.C. 45(n)Standard of proof; public policy considerations
The [Federal Trade] Commission shall have no authority under this section or section 57a of this title to declare unlawful an act or practice on the grounds that such act or practice is unfair unless the act or practice causes or is likely to cause substantial injury to consumers which is not reasonably avoidable by consumers themselves and not outweighed by countervailing benefits to consumers or to competition. In determining whether an act or practice is unfair, the Commission may consider established public policies as evidence to be considered with all other evidence. Such public policy considerations may not serve as a primary basis for such determination.

RCW § 19.86.920 provides as follows. “The legislature hereby declares that the purpose of this act is to complement

> the body of federal law governing restraints of … unfair.. practices in order to protect the public and foster fair and honest competition. It is the intent of the legislature that, in construing this act, the courts be guided by final decisions of the federal courts… and the federal trade commission…It is…the intent of the legislature that this act shall not be construed to prohibit acts or practices which are reasonable in relation to the development and preservation of business or which are not injurious to the public interest, nor be construed to authorize those acts or practices which unreasonably restrain trade or are unreasonable per se".

D. A path for the analysis of "unfairness" of an act in commerce is extracted from the foregoing:

The commercial "practice is unfair [if it] causes or is likely to cause substantial injury to consumers, which is not reasonably avoidable by consumers themselves and not outweighed by countervailing benefits."

1.The act or practice is not unfair unless the act or practice causes or is likely to cause substantial injury to consumers which is not reasonably avoidable by consumers themselves and not outweighed by countervailing benefits to consumers or to competition.

In determining whether an act or practice is unfair, the Commission may consider established public policies as evidence to be considered with all other evidence. Such public policy considerations may not serve as a primary basis for such determination. 15 U.S.C. 45(n)

For Mrs. Stutzman – there is evidence as follows:

a.There are ample providers who will serve weddings for same-sex couples and thus the lack of service is reasonably avoided by the consumers themselves,

b.There is little injury involving gas and feelings, $7.90 in this case.

c.The injury is not substantial but is nominal as found by the Trial Court.[14]

d.The injury and denial are not outweighed by countervailing benefits to consumers or to competition.

e.In determining whether an act or practice is unfair, established public policies may be evidenced.

f.Such public policy considerations may not serve as a primary basis for such determination. 15 U.S.C. 45(n)

2. The AG's sentence "This Court has not established a specific legal standard for "unfairness" (*see Klem*, 176 Wn.2d at 788),[15]" either discounts the analysis from *Blake*, supra 310-11 and the Supreme Court in *Federal Trade Commission v. Sperry & Hutchinson Co.*, 405 U.S. 233, 92 S.Ct. 898, 31 L.Ed.2d 170 (1972) or the sentence from *Klem* at 788 is dicta[16].

3. A trier of fact, guided by Blake and the FTC, would conclude that the act in the present case was not "Unfair" for either the CPA or WLAD.

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[14] Id 34.

[15] AG's Response Brief 19.

E. Our courts acknowledge that this nation was founded by Religious People[17] who have practiced and exercised their faith in accordance with Religious Doctrines founded on the Holy Scriptures which support the tenants of their faiths:

1. Where a defense is based on the constitutional guarantee of freedom to exercise protected Religious Beliefs, the Trial Court is obligated to determine the nature and source of the contended Religious Belief.

2. The Individual Plaintiffs, the AG and the Trial Court mock the Defendants by suggesting that any arbitrary personal preference or misunderstanding cannot be distinguished from Religious Doctrine.

3. Absent examination of the basis of the asserted Religious Belief, the result will be the equating of Religious Doctrine with personal preferences or misunderstandings or, as may be perceived and revealed, to be the personal preferences of the Individual Plaintiffs, of the AG or the Trial Court.

4. The Individual Plaintiffs are nonsensical in arguing that "a religious business owner could claim a right to discriminate on any

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16 State v. Montano, 239 P.3d 360, 169 Wn.2d 872, 883 (Wash. 2010)

17 In Zorach v. Clauson, 343 U.S. 306, 313 (1952), we gave specific recognition to the proposition that "[w]e are a **religious people** whose institutions presuppose a Supreme Being." … …Mr. Justice Clark in *School District of Abington Township, Pennsylvania v. Schempp*, ,213 83 S.Ct. 1560, 10 L.Ed.2d 844 (1963). Emphasis added.

basis…"[18] The Trial Court failed to analyze and differentiate Religious Beliefs founded on Religious Doctrine from individual preferences.

5. If a defendant's act … is not per se unfair or deceptive, the plaintiff must show the conduct is " unfair" or " deceptive" under a case-specific analysis of those terms. *Mellon v. Regional Trustee Services Corp.,* 334 P.3d 1120, 182 Wn.App. 476, 489 citing RCW 19.86.920 and *Klem v. Wash. Mut. Bank*, 176 Wn.2d 771, 787, 295 P.3d 1179 (2013) and quoting 15 U.S.C. § 45(n)).

F. Protections for same-sex couples would not be significantly undermined if the Court were to endorse a legal distinction between a state statute regarding sexual orientation discrimination and conduct associated with constitutional rights of exercise of religion; if same-sex couples could easily obtain services for weddings the WLAD protection would be of little use to them[19];

1. The failure to distinguished Religious Beliefs from individual preferences is revealed by the AG. The AG is unexcused in not realizing the fact that a *misunderstanding* (personal preference or prejudice) by some of the Southern Baptist Convention regarding race[20] is a specific example of interposing personal prejudice and preferences for Religions Doctrine. The

[18] Id 16.
[19] Individual Plaintiff's Brief 11.

AG doesn't understand what comprises Religious Doctrine. The Individual Plaintiffs are ignorant[21] of the magnitude of the Holy and Sanctified state of Marriage and the Scriptural significance recognized and practiced over the centuries.

The Individual Plaintiffs state "…there is no principled basis on which to grant an exception in Mrs. Stutzman's case, and not in the case of another person who claims to want to Exercise their Religion in public, contending that such is without doubt discrimination.[22]"

It is ludicrous to state that supportable Religious Doctrines can arise from the mere personal preferences or prejudices. Courts are able to differentiate between Religious Doctrine and a personal preference or prejudice. There will not be a Religious Doctrine found which supports denial of the sale of a cheese sandwich because of race, sexual orientation or other protected classes. However, it is judicially proper and constitutionally required, to consider acts, founded on personal preferences/prejudices, to determine if the acts do comprise the exercise of Religious Belief. Such assertions have not stumped our courts, e.g., the Religious use of peyote was regulated because the use was a crime in Utah. *Empl. Div., Dep't of Human Res. of Ore. v. Smith*, 494 U.S. 872, 879, 110 S. Ct. 1595, 108 L. Ed. 2d 876

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[20] AG's Response Brief 38 fn12.
[21] Individual Plaintiff's Brief 16 fn9.
[22] Id

(1990). There was no crime in this case. The Individual Plaintiffs' think that "Mrs. Stutzman can hold her religious beliefs but she is not entitled to [exercise][23] them in a place of public accommodation."[24] But a citizen's contention that their acts are the exercise of Religious Belief must not be dismissed, without scrutiny, merely because a state enacts a law.

2. The AG repeats his confusion regarding the concept of "Religious Belief based on Religious Doctrine" contrasted with acts based on personal preferences/prejudices. The AG attempts, but clearly fails, to construct analogies with the refusal to serve flowers based on Religious Doctrine. 1. "… but women should be subservient to men, I will not hire women to supervise men.[25]" The AG does not suggest a Religious Doctrinal basis regarding women supervising men. 2. Likewise regarding service to interracial customers, there is no suggested Religious Doctrine[26]. The Religious Doctrine for Mrs. Stutzman is Holy Matrimony found in the wedding of a man and a woman. Analogies regarding sale of alcohol[27] and cohabitating[28] likewise fail. An attempted analogy by the New Mexico

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[23] Id. Here the Individual Plaintiffs use the word "invoke" as a clever attempt to not refer to the constitutionally protected "exercise of Religion".
[24] Id 24.
[25] AG's Response Brief 12.
[26] Id 17.
[27] Id 14.
[28] Id 15.

Supreme Court fails on the same basis.[29] The Religious Doctrinal basis for the Defendants' and Mrs. Stutzman is found with absolute certainty to support the refusal to serve at a wedding other than a wedding between a man and a woman. Such claims will be revealed to be based on individual personal preference or prejudice and not on the Sanctity of Holy Scripture focused on the Holy and Sanctified Marriage of a man and a woman. The AG and the Individual Plaintiffs[30] assert that Mrs. Stutzman's personable and pleasant interactions with Mr. Ingersoll, is irrelevant, when she knew he was buying flowers for his homosexual companion. The AG, the Individual Plaintiffs and the Trial Court should have found this past agreeable relationship as evidence of a pattern of practice underscoring the willingness and ability to serve customers with whom she may have had personal criticisms of their lifestyle choices. The Trial Court should have held this years long practice as another grounds for requiring the AG and Individual Plaintiffs to prove "unfairness" rather than avoid that task by the Trial Court's use of the phrase "well settled law"[31]. The AG's assertion that "The long lack of commercial discrimination available suggests Defendants' willingness to serve Mr. Ingersoll at other times again makes no

[29] Id 12.
[30] Individual Plaintiff's Brief 11.
[31] Id 5

difference.[32]" may be unfounded relative to commercial services other than those which infringe the constitutional freedoms of Mrs. Stutzman. The AG's citation to a ruling from another state is not precedent for the Washington State Supreme Court and the sentence "This is discrimination, pure and simple, and it is not based on marital status. *See Elane Photography*, 309 P.3d at 62-63.[33]" is a mere conclusion by the AG and contradicts Mrs. Stutzman's testimony and long relationship with Mr. Ingersoll.

G. The AG and the Trial Court references to RCW 9A.36.078[34] [35] and bigotry[36] [37]are gratuitous in suggesting that Mrs. Stutzman is a criminal and a bigot. The suggestion is that those who believe that Holy Marriage is only between a man and a woman are bigots and criminals under Criminal Statute RCW 9A.36.078.

No one in this case discouraged or interfered in the marriage of the Individual Plaintiffs. The AG and Trial Court affront citizens of Washington State with this inference. The Individual Plaintiffs cite *Christian Legal Soc'y Chapter of the Univ. of Cal., Hastings Coll. of the Law v. Martinez*, 561 U.S.

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[32] Id 17
[33] Id
[34] AG's Response Brief 20 fn5.
[35] Memorandum Decision 36 fn22.
[36] AG's Response Brief 20 fn5.
[37] Memorandum Decision 36 fn22.

661, 689, 130 S. Ct. 2971, 177 L. Ed. 2d 838 (2010)[38] suggest that Religions and Religious Denominations which accept sinful members will be frowned upon if membership is eliminated upon the discovery of or open display of their sinful acts. The parties to this case and the Trial Court may be surprised, that memberships have and will be terminated by many churches when such open acts occur.

V. CONCLUSION

The Trial Court should be reversed.

Respectfully submitted this 2nd Day of February 2016.

AMICUS CURIAE PROTECTING CONSTITUTIONAL FREEDOMS, INC.
FLOYD E. IVEY, WSBA #6888

[38] Individual Plaintiff's Brief 11.

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MOTION TO SUBMIT *AMICUS CURIAE* BRIEF OF PROTECTING CONSTITUTIONAL FREEDOMS INC.

AMICUS CURIAE Moves per Appellate Rule 10.6 to submit *AMICUS CURIAE* BRIEF OF PROTECTING CONSTITUTIONAL FREEDOMS INC.

This Motion is filed contemporarily with the proposed AMICUS CURIAE BRIEF.

In accordance with Rule 10.6(b) the following statement is made: (1) The applicants interest and the person or group applicant represents regards the relentless challenge to rights under the First and Second Amendments of the United States Constitution and of like provisions in the constitutions of the several states. The particular case presently addressed is a matter from Richland Washington near where counsel resides. (2) The matter involves Religious Beliefs and rights known to counsel and as seen by counsel to be fraught with confusion and error as reported in the press. Counsel has considered the issues since early 2015, has read and researched the Brief and Memorandum Decision, and finds the parties to have failed to have addressed significant state and Federal cases and statutes regarding the disposal of the issues of the case. (3) Specific issues to which the amicus curiae brief will address arise from the perceived replacement of the Rights of Belief and Exercise with either a John Stuart Mill philosophy or with the personal preferences of the plaintiffs. (4) applicants first reason for believing that additional argument is necessary arises from the absence, in this case, of

critical examination and analysis of the distinction of Religious Doctrine contrasted with personal preferences and prejudices. The parties, including the AG and the Trial Court are perceived, from the assertions in the Briefs and Memorandum Decision, to urge the Supreme Court to ignore constitutional scrutiny in favor of current cultural whims. Seen in the AG's brief are attempts to analogize the Religious Doctrine and Belief relied upon by the Defendants with constructs having no relation to easily tested Religious Doctrine. Counsel asks the Court to allow the consideration of the briefing submitted as Amicus Curiae.

Counsel's second reason for this request depends from the unfortunate assertion that citizens with Religious Beliefs are bigots and that their attitudes and actions are either criminal or are approaching criminal. This issue is found in material submitted by the AG. is contained in the Memorandum Decision and is asserted by the Individual Plaintiffs.

Respectfully submitted this 2nd Day of February 2016

Floyd E. Ivey, WSBA 6888, PROTECTING CONSTITUTIONAL FREEDOMS INC.