No. 19-518

In the Supreme Court of the United States

COLORADO DEPARTMENT OF STATE,
Petitioner,

v.

MICHAEL BACA, POLLY BACA, AND ROBERT NEMANICH,
Respondents.

On Petition for a Writ of Certiorari to the U.S. Court of Appeals for the Tenth Circuit

MOTION FOR LEAVE TO FILE AMICUS BRIEF AND AMICUS BRIEF OF THOMAS E. WEAVER IN SUPPORT OF RESPONDENTS

Thomas E. Weaver
PO Box 1056
Bremerton, WA 98337
(360)792-9345
tweaver@tomweaverlaw.com
**Counsel of Record*

Motion for Leave to File Amicus Brief

COMES NOW, Thomas E. Weaver, and moves this Court for leave to appear as *amicus curiae* in support of Respondents.

Thomas E. Weaver is a lawyer living and practicing in the State of Washington and licensed to practice in this Court. Mr. Weaver has argued over 350 appellate cases in the Washington appellate courts and the Ninth Circuit Court of Appeals and has been granted leave by the Washington Supreme Court to appear as *amicus curiae* in at least twelve cases. Mr. Weaver co-wrote the Petition for Certiorari in McLemore v. Shoreline, 19-202, certiorari pending in this Court.

Mr. Weaver also has a significant interest in American political history and is currently researching and writing a book on the history of the Electoral College. Consistent with Rule 37, this brief brings to this Court's attention relevant historical information not already brought to its attention by the parties that will assist in its decision. Mr. Weaver has no financial interest or any other interest in the outcome of this case other than presenting this Court with factually accurate textual and historical information relevant to the Questions Presented.

Respondent Michael Baca has filed with this Court Blanket Consent to all *amicus* briefs. Petitioner has not filed blanket consent, necessitating a motion.

Respectfully submitted,

Thomas E. Weaver

Thomas E. Weaver
PO Box 1056
Bremerton, WA 98337
(360)792-9345
tweaver@tomweaverlaw.com
**Counsel of Record*

NOVEMBER 7, 2019

Table of Contents

Table of Authorities

Page(s)

Cases

Congressional Records

Constitutional Provisions

Newspapers and Periodicals

Other Authorities

Interest of the *Amicus*

Thomas E. Weaver[1] is a lawyer living and practicing in the State of Washington and licensed to practice in this Court. Mr. Weaver has argued over 350 appellate cases in the Washington appellate courts and the Ninth Circuit Court of Appeals and has been granted leave by the Washington Supreme Court to appear as *amicus curiae* in at least twelve cases. Mr. Weaver co-wrote the Petition for Certiorari in McLemore v. Shoreline, 19-202, certiorari pending in this Court.

Mr. Weaver also has a significant interest in American political history and is currently researching and writing a book on the history of the Electoral College. Consistent with Rule 37, this brief brings to this Court's attention relevant historical information not already brought to its attention by the parties that will assist in its decision. Mr. Weaver has no financial interest or any other interest in the outcome of this case other than presenting this Court with factually accurate historical information relevant to the Questions Presented.

---

[1] No counsel for any party authored this brief in whole or in part and no person or entity made a monetary contribution specifically for the preparation or submission of this brief. No person other than *Amicus Curiae* made a monetary contribution to its preparation or submission. The Respondents have filed blanket consent. Petitioner consent is not known. This Brief is being filed earlier than 10 days before the due date with a Motion to File.

Summary of Argument

The second Question Presented by the pending Petition for Certiorari presents an important question of constitutional interpretation never before directly addressed by this Court: the legality of so-called "faithless," or independent, electors. The case asks whether an elector, having been duly chosen by a State as an elector in the "manner as the Legislature thereof may direct" as required by Article II, §1, and having exercised his or her "vote by ballot for President and Vice-President" as required by the Twelfth Amendment, may then be removed as an elector and replaced by another elector?

Amicus makes two arguments. First, the issue presented is an important issue for which this Court should grant certiorari. The Court has a rare opportunity with the pending case to answer this important constitutional question divorced from an active political controversy.

Second, the text, history and, and practice of the Electoral College over the past two-and-a-half centuries supports the position that electors are lawfully permitted to exercise independent judgment in voting for the President and Vice-President, and frequently do. In one instance, the election of 1872, Congress ruled that three electors who failed to exercise independent judgment forfeited their votes. Every time Congress has taken up the issue of limiting elector discretion, either by congressional action or proposed

constitutional amendment, it has declined to act. This Court should acknowledge and affirm this history.

Argument

1. The United States Supreme Court should grant certiorari to the second Question Presented by the Petition for Writ of Certiorari and reach the merits of this important issue.

Although *amicus* believes the Tenth Circuit decision in this case should be affirmed, *amicus* also agrees with the petitioner that the current case presents an excellent vehicle to address for the first time the legality of electors exercising independent judgment in voting. This Court should grant certiorari as to the second Question Presented[2] and affirm.

---

[2] The Petition for Certiorari raises two Questions Presented. In the first Question Presented, Petitioner argues Respondent Michael Baca lacks standing to sue. *Amicus* believes this Court should deny certiorari as to the first Question Presented or, in the alternative, affirm the finding of standing for the reasons outlined in the Tenth Circuit decision. For the reasons set out in this brief, this Petition presents a rare and important question related to independent electors that should be decided on the merits.

Although so-called "faithless" electors[3] have existed since the beginning of the republic, this Court has never directly addressed the legality of their actions. The most important case to discuss the issue, *Ray v. Blair*, dealt with the collateral issue of whether a state may lawfully require electors to take an oath or pledge, not what should happen if that pledge were violated. *Ray v. Blair*, 343 U.S. 214, 72 S.Ct. 654, 96 L.Ed. 894 (1952). Notwithstanding the fact that the legality of electoral independence was not squarely addressed by *Ray v. Blair*, the dissenters took it upon themselves to reach that issue, saying, "No one faithful to our history can deny that the plan originally contemplated, what is implicit in its text, that electors would be free agents, to exercise an independent and nonpartisan judgment as to the men best qualified for the Nation's highest offices." *Ray* at 232 (Justice Jackson, dissenting), citing Federalist 68.

Petitioner argues the issue of electoral independence is an issue of "profound importance to the Nation" and one that should "be decided by

---

[3] The pejorative term "faithless elector" has been used for many decades to indicate electors who have failed to vote in accordance with their oath or pledge. In the aftermath of the general Election of 2016, there were calls by some people to try and change the election results and prevent Donald Trump from receiving a majority of elector votes. Proponents of this idea started using the more approbatory term "Hamilton electors," a reference to Hamilton's Federalist 68. *Amicus* prefers the more neutral title "independent elector" and that term will be used throughout this Brief unless the context requires otherwise.

this Court now, not in the heat of a close presidential election." Petition for Certiorari, 36. *Amicus* agrees this issue should be decided divorced from pending election results, and this Petition presents such an opportunity.

As set out in more detail below, Congress has twice argued the issue of whether to allow or disallow votes cast by independent electors. In both debates, the participants expressed relief that the results of their debate would not have any tangible effect on the election. In the first debate, following the election of 1872, Congress debated whether to allow or disallow three Electoral College votes cast for Horace Greeley, a man who died after the general election but before the Electoral College vote. President Grant's reelection was never in doubt. During the debate, New York Senator Roscoe Conkling, a major voice in late nineteenth century politics, argued the votes should be counted because the counting of the votes was "ministerial merely, and this question being independent of the question of the effect of the votes or the count." Congressional Globe, 42nd Congress, 2rd Session, February 12, 1873, 1285. Likewise, Senator John Scott of Pennsylvania argued that the votes for Horace Greeley should be counted, "postponing the question of the legal effect of votes cast for a man who shall appear to have been dead at the time they were cast, until the whole vote shall come to be counted." *Id.* In the opinion of these senators, it was unnecessary to reach the merits of whether electors should be allowed to vote for a dead man and what to do if a dead man won the election, given that President Grant's reelection was secure.

What effect, if any, the election of a dead man might have should be left for another day.

Likewise, following the Election of 1968, Congress adjourned for two hours to debate whether to allow a single electoral vote for George Wallace from a North Carolina elector. Ultimately, the vote was allowed to stand, but in large part because President Nixon's election was guaranteed. As Representative Charles Jonas put it, "Fortunately we can debate this issue dispassionately and objectively because the result of the election in the Electoral College will not be affected regardless of the outcome of the contest today." Congressional Record, 90th Congress, Volume 115, Part 1, January 6, 1969, 147.

What is significant about both the 1873 and 1969 debates is that the election of Presidents Grant and Nixon were never in doubt. It is not difficult, however, to envision a scenario where independent electors have a tangible effect on the final outcome. In the Election of 2000, George W. Bush won the Electoral College vote against Al Gore 271 to 266. If just three independent electors had switched their votes, the final outcome would have been reversed.

This Court's experience in 2000 should also act as a cautionary tale. The general election was held on November 7, 2000 with Bush as the apparent winner in Florida. On November 16, the Florida Democratic Party and Gore filed suit in Leon County alleging a variety of election irregularities. On November 17, the trial court

denied relief. On November 21, the Florida Supreme Court reversed and expanded the time for a manual recount of the vote. On December 4, this Court reversed and remanded, commenting on the need for "expedition requisite for the controversy." *Bush v. Palm Beach County Canvassing Board*, 531 U.S. 70, 75, 121 S.Ct. 471, 148 L.Ed.2d 366 (2000). On November 26, the Florida Elections Canvassing Commission certified Bush to be the winner. Gore again sued, alleging election fraud in three counties. A judge in Leon County held a two day trial starting on December 2 and issued its oral decision denying relief on December 4. Four days later, on December 8, the Florida Supreme Court reversed and ordered 9000 votes in Miami-Dade County be recounted by hand. This Court granted certiorari on December 9 and reversed on December 12. *Bush v. Gore*, 531 U.S. 98, 121 S.Ct. 525, 148 L.Ed.2d 388 (2000).

While this Court's decision on December 12, 2000 decided with finality the legal controversy before it, it was not without some significant damage to the reputation of the Court. Two trial court decisions, two Florida Supreme Court decisions, and two United States Supreme Court decisions in the span of twenty-three days is highly unusual in American jurisprudence and many criticize the haste with which this Court worked. On addition to the haste, critics have also pointed out the politically charged atmosphere in which the decision was made. As one newspaper put it twelve years after the decision, "More recently, however, few decisions have occasioned more bitterness and rancor than *Bush v. Gore*, a 5-4 decision split along

ideological lines. It was seen by many (principally, of course, on the left) as a political act disguised as jurisprudence and designed to alter the course of the single most consequential political act of a democracy — the election of a president." Chicago Tribune, "Why Roberts Did It," July 2, 2012. The time to decide difficult election issues is not in the middle of an election controversy, but, to paraphrase Representative Jonas, when the result of the election will not be affected and dispassionate and objective discourse can prevail. Because the question is now before the Court divorced from an active political controversy, this Court should grant certiorari to the second Question Presented of the Petition.

2. This Court should affirm the Tenth Circuit and acknowledge the historical role of independent electors.

Throughout its Petition, Petitioner relies heavily on what it characterizes as "longstanding historical practice" to support its position that states may prohibit independent electors from voting their conscience. Petition for Certiorari, 28. But while the Petition for Certiorari contains detailed historical data from the early years of the republic to the passage of the Twelfth Amendment, it contains little historical data after 1804. In fact, as this *amicus* brief will demonstrate, independent electors have a rich history that extends well past 1804 and continues into the present. Further, while *amicus* agrees that the history of the Electoral College is important to this analysis, he

disagrees with the conclusion that that history allows states to replace electors who do not vote in accordance with their oath. As Justice Jackson put it, no one "faithful to our history can deny that the plan originally contemplated, what is implicit in its text, that electors would be free agents." *Ray v. Blair* at 232 (Justice Jackson, dissenting).

In reviewing the historical record of independent electors, three conclusions can be reached. First, a fair reading of the text, history, and practice of the Electoral College since the beginning of the republic leads to the conclusion that electors lawfully can and often do exercise independent discretion in casting their votes. Second, the existence of the Electoral College and the ability of independent electors to circumvent the will of the voters has been heavily criticized by prominent public figures of every political persuasion for over two centuries. Third, despite this persistent criticism, every attempt to eliminate or significantly modify the Electoral College, either by congressional action or constitutional amendment, has failed. This Court should not circumvent that history.

Despite Alexander Hamilton's claim in Federalist 68 that that the Electoral College is "almost the only part of the system, of any consequence, which has escaped without severe censure," the Electoral College has suffered from persistent and frequently withering criticism almost from the outset. Fundamental flaws in the system exposed by the Election of 1800 forced a major retooling of the system with the Twelfth

Amendment in 1804. The Electoral College has been subsequently amended three other times, in Amendment XIV, §2, Amendment XXIII, and Amendment XXIV, but each of these amendments only brought minor changes. In addition, major revisions to the Electoral College system were proposed to Congress in 1826; during the Reconstruction Era, when at least three constitutional amendments were proposed; and in the period following the World War II, when four separate constitutional amendments passed either the House or the Senate but failed in the other chamber. Each of these efforts to eliminate or make major modifications to the Electoral College system proved unsuccessful, and the fundamental Electoral College system remains essentially unchanged since 1804.

Criticisms of the Electoral College generally fall into three categories: (1) it fails to elect the president by direct vote of the people; (2) it is an unnecessary vestige of antebellum America where compromise with the slave holding states was required; and (3) the power of electors to vote independently threatens to undermine the democratically elected winners of the election. While the first two of these criticisms lie outside the scope of the pending Petition, the latter criticism is directly implicated by the Petition.

The text of the Electoral College clause of the 1787 Constitution supports the position that electors are to exercise independent judgment in exercising their vote for President, without regard to external factors. The clause, which is found in

three paragraphs of Article II, §1, is at once the longest and most detailed of all the clauses in the Constitution and the most vague. While other clauses set forth detailed requirements for choosing Representatives and Senators and their qualifications, the language regarding electors states they are to be appointed by each state "in such manner as the Legislature thereof may direct." But on one point the clause is clear: the role of the elector is to "vote by Ballot for two persons" for president. In the three paragraphs that make up the Electoral College clause, the word "vote" (or "votes" or "voted") appears eleven times and the word "Ballot" (capitalized in the original) appears three times. This proliferation of the word "vote" is repeated in the Twelfth Amendment, where the word is used twelve times, and begins, "The Electors shall meet in their respective states and vote by ballot for President and Vice-President." Excluding Article II, §1, the word "vote" appears only five other times in the body of the 1787 Constitution, and each time clearly refers to a person exercising independent judgment. Article 1, §3 provides that each Senator shall have one vote (as opposed to voting jointly as a state), but the Vice-President shall have no vote except in the case of a tie. Article 1, §7 provides that laws shall be decided on votes of yeas and nays, the names of those voting for and against the law shall be recorded, and the vote presented to the President. This textual analysis supports the position that electors are to exercise independent judgment in voting.

That Alexander Hamilton expected electors to exercise independent judgment is clear from his oft-quoted Federalist 68, where he described the qualities of the men he expected to act as electors as "men most capable of analyzing the qualities adapted to the station, and acting under circumstances favorable to deliberation, and to a judicious combination of all the reasons and inducements which were proper to govern their choice. A small number of persons, selected by their fellow-citizens from the general mass, will be most likely to possess the information and discernment requisite to such complicated investigations."

In the beginning, all electors exercised independent judgment in voting. In the Election of 1788, George Washington was famously the only president to receive the unanimous support of each of the 69 voting electors. But that only tells part of the story. Because each elector was required pursuant to Article II, §1 to vote twice for president, the electors scattered their second votes across eleven candidates from six different states. Alexander Hamilton successfully steered the majority of electors into voting for John Adams, with John Jay coming in a distant third place, but the remaining electors distributed their votes among a variety of prominent statesmen and favorite sons. In total, ten men, not including Washington and Adams, received electoral votes, including two men who received one vote each. Thirty-two years later in 1820, New Hampshire Elector William Plumer, who was pledged to vote for James Monroe but cast his vote instead for John Quincey Adams, allegedly did so in order to prevent

a unanimous vote for Monroe and to preserve President Washington's record of being the only President to receive the unanimous support of the electors. In doing so, he became arguably the most famous "faithless elector" in American history and no controversy was raised by this vote.

After the contested Election of 1824, which was decided by the House of Representatives after no candidate achieved an electoral majority, Congress created a joint committee chaired by Senator Thomas Hart Benton of Missouri, a highly respected and influential Senator in the early Nineteenth Century, to investigate the possibility of amending the Constitution to modify or eliminate the Electoral College. Speaking in 1826, Senator Benton explained the original understanding of the role of electors, "It was the intention of the constitution that these electors should be an independent body of men, chosen by the people from among themselves, on account of their superior virtue, discernment and information, and that this select body should be left to make the election according to their own will, without the slightest control from the body of the people." Niles Weekly Register, Speech to Senate, Volume 74, 338.

By the time Justice Joseph Story wrote his highly influential *Commentaries on the Constitution*, he noted what he considered a disturbing trend by state legislatures to bind the votes of electors, something he considered a subversion of the original intent. Writing in 1833, Justice Story said, "It is notorious that the electors

are not chosen with reference to particular candidates, and are silently pledged to vote for them. Nay, upon some occasions the electors publicly pledge themselves to vote for a particular person; and this, in effect, the whole foundation of the system, so elaborately constructed, is *subverted*. . . So that nothing is left to the electors after their [state legislature's] choice but to register votes which are already pledged; and an exercise of independent judgment would be treated as a political usurpation, dishonorable to the individual, and a fraud upon his constituents." J. Story, *Commentaries*, §1463 (emphasis added). In sum, these important voices from the ratification debate and early Nineteenth Century are clear evidence that the original meaning of the word "vote," as used in both the 1787 Constitution and the Twelfth Amendment, contemplated the use of independent judgment by the electors.

There is only one election where independent voters have affected the outcome of the election, albeit only temporarily. While Martin Van Buren easily won the 1836 election, his choice for Vice-President, Ricard Johnson, failed to achieve a majority of the electoral vote. Virginia's twenty-three electors opposed Johnson's election as Vice-President because he was openly involved in a sexual relationship with a slave of mixed race. Ignoring their pledge to vote for both Van Buren and Johnson, the Virginia coalition voted for Senator William Smith for Vice-President instead. As a result, no candidate carried a majority and, pursuant to the Twelfth Amendment, the election was decided by the Senate, where Johnson was

promptly chosen Vice-President on the first ballot by a vote of 33 to 16. Register of Debates, 24th Congress, February 8, 1837, 738-39.

As noted earlier, Congress has twice engaged in a major debate over the role of independent electors. But those two debates arose in markedly different circumstances. The first arose in the aftermath of the 1872 election. In the November general election, Republicans Ulysses Grant and Henry Wilson easily won over their Democratic rivals, Horace Greeley and Benjamin Brown. Had things gone smoothly, the total electoral vote should have been 300 to 80. But things did not go smoothly. Relevant to this Petition, on November 29, 1872, just days before the date on which the electors were expected to vote, Greeley died, leaving his 80 electors without a candidate. Despite the fact the Democratic electors had all pledged their vote to Greeley, fourteen electors chose not to vote at all and the rest gave their votes to five different men, including three Georgians who voted for Greeley. The votes for Vice-President were even more varied, with eight Democrats receiving votes.

When Congress met to count the Electoral College votes, there was a motion to disallow the three votes for Greeley on the basis that, in the words of Representative George Hoar of Massachusetts, a person "deceased before the vote is cast" is not a "person within the meaning of the Constitution." Congressional Globe, 1873, 1285. Although the Senate voted 44 to 19 to allow the votes to stand, the House of Representatives voted

101 to 99 to disallow the votes and the motion to disallow the votes passed. This represents the first and only time in American history that an electoral vote was discounted by Congress on the ground of *who* the elector voted for, as opposed to some other reason such as election fraud or corruption. What is ironic is that the electors who exercised independent judgment and voted for someone other than their pledged candidate had their votes counted while the three electors who voted consistent with their pledges had their votes discounted.

The other major debate about independent electors occurred following the Election of 1968. When the votes from the state of North Carolina were read, it was announced that Richard Nixon received twelve electoral votes and George Wallace received one vote. Dr. Lloyd Bailey, Elector from Rocky Mount, North Carolina, voted for Wallace, ostensibly because Wallace won Dr. Bailey's congressional district. Representative James O'Hara, Democrat from Michigan, and Senator Edmund Meese, Republican from Maine (and future Attorney General), filed a written objection, joined by an additional thirty-seven Representatives and six Senators. Among the objectors were future Republican President George H.W. Bush and future Democratic Vice-President Walter Mondale.

Speaking in favor of the motion, Representative James Wright, Democrat from Texas and future Speaker of the House, stated:

> The basic question is that of sovereignty. Who, under the American system, is sovereign? In whom does the ultimate right and the power of decision reside? Are the people sovereign? Do they have the right to expect – indeed, to insist that their clearly expressed wishes shall be faithfully carried out by the college of electors, that strangely anomalous and almost anonymous appendage which the Constitution rather awkwardly interposed between them and their chosen leaders? Or shall we determine today that the people, in the final analysis, have no such right at all? Shall we declare that they have no authority whatever to require that their votes be faithfully reflected by their agents, the electors – no right, no remedy, no recourse and no protection against the faithless elector who betrays their trust, abuses his office disdains their wishes, and cavalierly substitutes his will for theirs? Think what a dangerous precedent that would be.

Congressional Record, Volume 115, Part 1, 146-47. According to Representative Wright, the role of electors is to perform a "perfunctory duty." He continued "The Electoral College is a creaky and antiquated bit of machinery, a relic of the powdered wig and snuffbox era. We have long since outgrown it. Personally I think we should be done with it

entirely." Congressional Record, Volume 115, Part 1, 147.

The first Representative to speak in favor of counting the vote, Charles Jonas of North Carolina, did so with "grave misgivings." Congressional Record, Volume 115, Part 1, 147. On the one hand, he felt it circumvented the will of the voters of North Carolina to allow Dr. Bailey, whose name did not appear on the ballot and whose identity was largely unknown, to vote for his preferred choice. On the other hand, he could find no constitutional provision or statute that required him to vote in accordance with the election results. In the absence of such a provision, the vote must be counted as cast. Many other congressmen made the same point, arguing that the Constitution allows electors to vote however they wish.

The House and Senate debated for two hours on the question before taking a vote. In the end, the objection was rejected by a vote of 228 to 170 in the House and 58 to 33 in the Senate and the vote for Wallace was counted. In reading the congressional debate, however, two points stand out. First, is the bipartisan nature of the objections to the electoral vote. Both prominent Republicans and prominent Democrats voted to disallow Dr. Bailey's vote, despite the fact that reversing his vote would result in an additional vote for the Republican candidate, Richard Nixon.

Second, most Representatives and Senators that voted to oppose the motion did so reluctantly. Opposition to the motion was not based the belief

that Dr. Bailey's decision was beneficial or good for the electoral process, but based upon the belief that the Constitution and its history have consistently upheld the right of electors to vote independently and Congress should not interfere with that history.

Since the debate in 1969, electors have continued to cast independent votes, doing so in the elections of 1972, 1988, 2004, and 2016. The independent elector in 1988, Margarette Leach, switched her votes, voting for Lloyd Bentsen instead of Michael Dukakis for President and Dukakis instead of Bentsen for Vice-President, saying at the time, "I wanted to call attention to the fact that once somebody has been elected to the Electoral College, you really don't have any control over them." The Salina Journal, "It's Official; Bush Elected President," December 20, 1988. The most varied Electoral College results since the passage of the Twelfth Amendment occurred during the Election of 2016 when, in addition to Respondent Michael Baca, seven independent electors voted for five candidates.

Amicus declines to comment on what, if any, changes or amendments should be made to the Electoral College to correct its perceived deficiencies. That is for the political processes to work out. But under the current constitutional framework set out in the plain text of Article II, §1 and the Twelfth Amendment, as well as the history and practice of the Electoral College, once an elector has been selected in the "manner as the Legislature thereof may direct," it is up to that

elector to "vote by ballot for President and Vice-President." The attempt by Colorado to control the vote of the electors "might be a noble endeavor . . ., but the fact that a given law or procedure is efficient, convenient, and useful will not save it if it is contrary to the Constitution." *Arizona State Legislature v. Arizona Independent Redistricting Commission*, 135 S.Ct. 2652, 2678, 192 L.Ed.2d 704 (2015) (Chief Justice Roberts, dissenting) (commenting on the elections clause of Article 1, §4), quoting *INS v. Chadha*, 462 U.S. 919, 103 S.Ct. 2764, 77 L.Ed.2d 317 (1983). This Court should affirm the Tenth Circuit.

Conclusion

This Court should grant certiorari to the second Question Presented and affirm the Tenth Circuit.

Respectfully submitted,

Thomas E. Weaver

Thomas E. Weaver
PO Box 1056
Bremerton, WA 98337
(360)792-9345
tweaver@tomweaverlaw.com
**Counsel of Record*

NOVEMBER 7, 2019