

DIRECTOR OF THE DEPARTMENT OF LABOR & INDUSTRIES
STATE OF WASHINGTON

In re:

CAROLYN WERRE,

APPELLANT,

Determination of Compliance No. DOC-
025-15,

OAH Docket No. 2014-LI-0233

DIRECTOR'S ORDER

RCW 49.48.084(4); RCW 34.05

Joel Sacks, Director of the Washington State Department of Labor & Industries, having considered the appeal filed by Carolyn Werre (the Appellant) and briefing submitted to the Director's Office, and having reviewed the record, issues this Director's Order.

The parties in this matter are the Department of Labor & Industries, the Appellant, and the American Indian Community Center Association.

The Director makes the following Findings of Fact, Conclusions of Law, and Final Decision and Order.

I. FINDINGS OF FACT

1. The Office of Administrative Hearings issued and served the Initial Order on November 24, 2015.
2. On December 22, 2015, the Director received a timely filed petition for review from the

Appellant.

3. The Director adopts and incorporates all the Order's Findings of Fact.
4. The Director also adopts and incorporates the Order's "Issue Presented," "Order Summary," and "Hearing" summary.

II. CONCLUSIONS OF LAW

1. Based on the Appellant's timely filed petition for review, there is authority to review and decide this matter under RCW 49.48.084 and RCW 34.05.
2. The Director adopts and incorporates Conclusions of Law and Order No. 1-5 and 7-18.
3. The Appellant did not prove by a preponderance of the evidence that she had unpaid wages due to her.
4. The Appellant has not shown that any witnesses were excluded or that any error was committed in this regard.
5. The transcripts of the deposition of Appellant taken on August 12, 2015, and September 4, 2015, were submitted to the Director. Because the transcripts were not admitted at the hearing, they were not considered by the Director. To the extent the submission of the transcripts was a request for their admission, such request is denied. The transcripts will be retained, without consideration, in the record.

III. DECISION AND ORDER

Consistent with the above Findings of Fact and Conclusion of Law, the Determination of Compliance is AFFIRMED and the Order of November 24, 2015, is incorporated by reference herein.

DATED at Tumwater this 28 day of April, 2016.



JOEL SACKS
Director

SERVICE

This Order was served on you the day it was deposited in the United States mail. RCW 34.05.010(19).

APPEAL RIGHTS

Reconsideration. Any party may file a petition for reconsideration. RCW 34.05.470. Any petition for reconsideration must be filed within 10 days of service of this Order and must state the specific grounds on which relief is requested. No matter will be reconsidered unless it clearly appears from the petition for reconsideration that (a) there is material clerical error in the order **or** (b) there is specific material error of fact or law. A petition for reconsideration, together with any argument in support thereof, should be filed by mailing or delivering it directly to Joel Sacks, Director of the Department of Labor and Industries, P. O. Box 44001 Olympia, Washington 98504-4001, with a copy to all other parties of record and their representatives. Filing means actual receipt of the document at the Director's Office. RCW 34.05.010(6).

NOTE: A petition for reconsideration is not required before seeking judicial review. If a petition for reconsideration is filed, however, the 30-day period will begin to run upon the resolution of that petition. A timely filed petition for reconsideration is deemed to be denied if, within twenty (20) days from the date the petition is filed, the Director does not (a) dispose of the petition **or** (b) serve the parties with a written notice specifying the date by which it will act on the petition. RCW 34.05.470(3).

Judicial Review. Any petition for judicial review must be filed with the appropriate court and served within 30 days after service of this Order. RCW 34.05.542. RCW 49.48.084(5) provides: "Orders that are not appealed within the time period specified in this section and Chapter 34.05 RCW are final and binding, and not subject to further appeal." Proceedings for judicial review may be instituted by filing a petition in superior court according to the procedures specified in chapter 34.05 RCW, Part V, Judicial Review and Civil Enforcement.

DECLARATION OF MAILING

I, Lisa Rodriguez, hereby declare under penalty of perjury under the laws of the State of Washington, that the DIRECTOR'S ORDER was mailed on the 28 day of April 2016, to the following via regular and certified mail, postage prepaid:

Ryan Best
Best Law PLLC
905 W. Riverside, Ste. 409
Spokane, WA 99201

Amanda Goss, Senior Counsel
Attorney General's Office
800 Fifth Ave., Ste. 2000
Seattle, WA 98104

Francis Devereaux
American Indian
Community Center Assoc.
801 E. 2nd Avenue
Spokane, WA 99202

DATED this 28 day of April, 2016, at Tumwater, Washington.

**WASHINGTON STATE
OFFICE OF ADMINISTRATIVE HEARINGS
FOR THE DEPARTMENT OF LABOR AND INDUSTRIES**

In the matter of:

CAROLYN WERRE,

Appellant/Wage Claimant.

Docket No. 2014-LI-0233

INITIAL ORDER

Agency: Labor and Industries
Program: Wage Payments
Agency No. DOC-025-15

1. ISSUES PRESENTED

1. Whether the Department correctly determined that the employer American Indian Community Center Association did not owe Appellant Carolyn Werre wages for overtime hours worked between January 1, 2011 to February 19, 2014, as set forth in the Determination of Compliance issued August 12, 2014.

2. ORDER SUMMARY

1. The Department correctly determined that the employer American Indian Community Center Association did not owe Appellant Carolyn Werre wages for overtime hours worked between January 1, 2011 to February 19, 2014, as set forth in the Determination of Compliance issued August 12, 2014.

3. HEARING

1. Hearing Date: September 28, 2015 to October 1, 2015
2. Administrative Law Judge: Courtney Beebe
3. Appellant: Carolyn Werre
4. Agency: Department of Labor and Industries
 1. Representative: Amanda J. Goss, Assistant Attorney General
 2. Employer Rep.: Brian P. McClatchey, McClatchey Law Firm, PLLC
5. Exhibits: The Administrative Law Judge admitted Department Exhibits 1 through 46. The Administrative Law Judge excluded Appellant's Exhibits E, M, N, P, T, U, X, Z, AA, BB, CC, DD, EE, LL, MM, SS, UU, VV, WW, YY, ZZ, EEE, FFF, GGG, HHH, and admitted Exhibit DDD as redacted. The Administrative Law Judge admitted Appellant's remaining Exhibits A-ZZZ unless specifically excluded.
6. Appellant's Witnesses: Gary Fox, Loree Eard, Linda Lauch, Diane Robnett, Marian Bolen, Katie Maucian, and Belle Innes.
7. Department's Witnesses: Debra Campbell, Sylvia Cardenas, Francis Devereaux, Jeremy Gordon, Debra Guenther, Mary Hagen, Patti Jennen, Mary Jones, Sophie Tonasket, and Kathy Richards.

4. FINDINGS OF FACT

The Administrative Law Judge finds the following facts by a preponderance of the evidence:

Jurisdiction

1. On February 19, 2014, Carolyn Werre ("Appellant") submitted a wage complaint (Exhibit12) to the Department of Labor and Industries ("Department"), claiming that her employer the American Indian Community Center Association ("AICC") owed her wages for overtime hours worked between January 1, 2011 and February 19, 2014.¹
2. On August 12, 2014, the Department issued a Determination of Compliance (Exhibit1), concluding that the AICC did not owe Appellant wages for overtime hours worked between January 1, 2011 and February 19, 2014.
3. On August 27, 2014, the Appellant submitted a request for hearing to the Department (Exhibit 2).

Overtime Wages and Investigation of Complaint

1. The AICC is a non-profit organization that assists members of the Native American Community in North-East Washington. The AICC has multiple funding sources that include government contracts, private donations, and grants.
2. Appellant became involved in the AICC in the 1970s and has acted as a loyal supporter, employee, and volunteer in varying capacities with the organization. Appellant became involved because she married into a Native American family and the success and support of the local Native American community became personally important to Appellant. Appellant worked very hard to support AICC and she became a respected and admired member of the AICC and local Native American community.
3. During the period of January 1, 2011, through February 19, 2014, the Appellant was employed by the AICC as the supervisor of the Visitation Program. This

¹ In the Appellant's original wage complaint, Exhibit 12, the Appellant alleged she was owed overtime wages for the period of January 1, 2012 through February 19, 2014. However, the parties agreed on the record at the March 23, 2015 status conference that the Appellant's wage claim would be amended to include wages for an additional year, and that the period at issue would be January 1, 2011 through February 19, 2014.

program assisted with transporting and supervising parent-child visits for children who were in foster care or dependency proceedings as per the Indian Child Welfare Act. The State of Washington Department of Social and Health Services (“DSHS”) paid AICC for conducting the visitations by remitting funds based on the number of visitations. Occasionally one of the local Native American tribes would pay AICC directly for the same service.

4. Appellant, like the other AICC employees, desired to continue the success of the AICC and would volunteer to perform work at other events held at the AICC. Appellant assisted with weekly Thursday night dinners, holiday events, funerals and other weekend events. The AICC did not require Appellant to participate in these activities as part of her employment as the supervisor of the Visitation Program. These events were largely unrelated to the Visitation Program, but integral to the success of AICC.
5. The AICC, as staffed during the period at issue, could only perform a certain number of visitations per day because AICC could only pay Appellant to work forty hours per week. Similarly, the other Visitation Program staff members worked a limited number of hours per week. The limitations on the number of hours an employee in the Visitation Program worked was dependent on the overall AICC budget; the work time allotted for employees of the Visitation Program was not based directly on, nor was it dependent on, the payments AICC received from DSHS for visitations. It was within the discretion of the AICC’s Board of Directors and Executive Director to allot the funds received by DSHS and other funding sources.
6. The AICC did not grant the Appellant, as supervisor of the Visitation Program, any discretion or authority to 1) increase the number of visitations in order to obtain more money from DSHS, or 2) determine how payments from DSHS would be spent on wages, overtime, or other expenditures.
7. Appellant disagreed with the AICC’s decision to limit the number of hours she and other staff members could work. Appellant believed that she could schedule more visits and transports, work more hours to complete the work, and receive overtime pay based on the additional funds that DSHS would pay the AICC for the increased number of visits and transports.
8. Appellant did not have a set work schedule, but AICC expected her to schedule visitations and transportations to occur according to times that would accommodate the work and school schedules of the parents and children. This need required Appellant and other staff members of the Visitation Program to

work in the evenings and on weekends. Scheduling the visitation and transportation appointments was within the Appellant's discretion and Appellant frequently scheduled transportation and visitation appointments in the afternoons and evenings of weekdays and weekends (Exhibits 5-8).

9. The AICC has a written policy that all employees were to work the number of hours AICC assigned the employees to work, and that employees were not to work overtime. If an employee encountered a situation that required the employee to work more than the number of hours allotted by AICC, then the employee was to obtain pre-approval from a supervisor to work overtime hours or work the hours and then work reduced hours on another day within the same pay period.
10. The AICC informed Appellant of this written policy and Appellant understood the policy. The AICC informed Appellant that she was to work forty hours per week and no more hours than the allotted number. The Appellant understood that she was to perform all assigned tasks as the supervisor for the Visitation Program within forty hours per week.
11. The AICC had a method by which its employees reported work hours on time sheets. Employees would record the number of hours worked, as well as any vacation and / or sick leave taken, on the time sheet. Requests to draw payment of funds from vacation leave were also accounted for on the time sheets. The employee would then submit the timesheet to the employee's supervisor for approval. After the timesheet was approved, the timesheet would be sent to payroll and the employee would be paid according to the approved time sheet.
12. The Appellant filled out timesheets twice per month (Exhibit 13). The Appellant would account for work time, vacation and/or sick leave, and money draws for the period of the 1st through the 15th of the month on one time sheet, and for the period of the 16th through the 30th or 31st of the month on a second time sheet. Appellant submitted all timesheets to her supervisor for approval. All time sheets were approved by Appellant's supervisor. Appellant was paid according to the time sheets that she filled out, were approved by her supervisor, and forwarded to pay roll.
13. Appellant did not claim overtime hours, i.e. hours worked in excess of forty hours per week or eight hours per day, on her time sheets for the period of January 1, 2011 through December 15, 2013 and January 16, 2014 through February 15, 2014. Appellant received all wages, leave payments, and money draws due to her from AICC for these periods.

14. Appellant, however, claimed 12 hours of overtime on a timesheet submitted to her supervisor for the period of December 16, 2013 through December 31, 2013. (Exhibit 13, pp.48-49.) Appellant similarly claimed 11 hours of overtime on a time sheet for the period of January 1, 2014 through January 15, 2014. (Exhibit 13, pp.50-51.) Appellant's supervisors approved Appellant's timesheets as submitted.
15. However, after reviewing the visitation calendars for these weeks (Exhibits 8), pay roll and Appellant's supervisors were not able to confirm that Appellant in fact worked the additional hours claimed because there were records of cancelled visitations that she claimed she worked and she claimed working during holiday hours and events. Regardless, AICC instructed Appellant that she was to take time off of work to off-set the overtime hours she claimed she worked because AICC could not afford to pay Appellant the unverified overtime she claimed she worked and because Appellant did not obtain pre-approval to work the overtime hours from her supervisor.
16. Appellant refused to follow the directive of the AICC regarding the hours she was allotted to work and claim on her timesheet. AICC and Appellant engaged in conflict over overtime pay and other budgetary issues and the escalating conflict resulted in the termination of Appellant's employment on February 19, 2014.

Credibility Findings

17. The testimony of the parties and the documentation presented conflicted on material points. Based upon the evidence presented, and having carefully considered and weighed all the evidence, including the demeanor and motivations of the parties, the reasonableness of the testimony and the totality of the circumstances presented, the Administrative Law Judge finds that the Appellant's testimony and documentary evidence regarding the number of overtime hours Appellant worked between January 1, 2011, and February 19, 2014, lacks credibility.
18. The Administrative Law Judge makes this finding based on several observations. First, the Appellant did not use the AICC's reasonable method of reporting overtime by filling out her timesheets to reflect the actual hours worked, she simply recorded eight hours per day each workday as well as leave and draw requests.
19. Second, the Appellant presented at least four inconsistent accounts of the number of hours she worked each week (Wage Complaint (Exhibit 12); IRA

Spreadsheet (Exhibit 27); Appellant's Interrogatory Response (Exhibits 15-17); Additional Interrogatory Response (Exhibit 10)), despite multiple opportunities to provide correct and consistent information.

20. Third, the Appellant engaged in a practice of changing and manipulating AICC records in order to support her assertion that she worked overtime hours. The Appellant obtained the original 2013 visitation scheduling calendars (Exhibit 7) when she left employment, and inserted her name into appointments she did not attend when compared with the visitation reports for the same visits noted on the visitation scheduling calendar (Exhibits 35-46). Notably, the Appellant's manipulations and changes to the 2013 visitation scheduling calendars are inconsistent with the hours she asserted she worked for the same days in her original Wage Complaint (Exhibit 12), IRA Spreadsheet (Exhibit 27), and Interrogatory Responses (Exhibits 15-17 and 10).
21. Lastly, while the Appellant's witnesses corroborated Appellant's testimony that she was a fixture at the AICC who worked hard for the local Native American community and that the Appellant is person of generally good character, none of the Appellant's witnesses corroborated Appellant's testimony that she was required to work at the community Thursday night dinner, holiday dinners, funerals, or other weekend events at AICC. To the contrary, the Department presented multiple, credible witnesses that all consistently testified that participation such activities was outside AICC employment and considered volunteer work.

5. CONCLUSIONS OF LAW

Based on the facts above, the Administrative Law Judge makes the following conclusions:

Jurisdiction

1. The Office of Administrative Hearings has jurisdiction over the persons and subject matter of this case under RCW 49.48.084 and 34.05.

Applicable Law

2. The Fair Labor Standards Act of 1938 ("FLSA") deals with overtime and minimum wage requirements for employees. The Washington Minimum Wage Act ("WMWA"), RCW 49.46 and the Wage Payment Act, RCW 49.48 ("WPA") are based on the FLSA, but not identical.

3. Wage Payment Act, RCW 49.48 (WPA) authorizes administrative enforcement of wage payment requirements. Upon receipt of a wage complaint that alleges a violation of a wage payment requirement, the Department "shall investigate" and, unless otherwise resolved, "shall" issue either a citation (when finding a wage law violation) or a determination of compliance (when finding no violation) within sixty days. RCW 49.48.083. The Department may extend the time period by providing advance written notice to the employee and the employer setting forth good cause for an extension of the time period. (Id.)
4. Wage payment requirements are those "set forth in RCW 49.46.020, 49.46.130, 49.48.010, 49.52.050, or 49.52.060, and any related rules adopted by the department." RCW 49.48.082(10). These wage payment requirements include, but are not limited to, requirements to pay minimum wages, overtime wages, agreed wages, and wages for final pay periods. RCW 49.48.082(12).
5. RCW 49.52.050(2) provides that it is unlawful to willfully withhold an agreed wage, which includes any wage an "employer is obligated to pay such employee by any statute, ordinance, or contract." The provisions of RCW 49.52.050(2) include oral or written agreements for hourly wages in excess of the minimum wage.
6. Under the WPA, the wage claimant has the initial burden of showing *prima facie* evidence of a wage payment law violation. See, *Anderson v. Mt. Clemens Pottery Co.*, 328 U.S. 680, 687-688, S.Ct. 1187, 90 L.Ed. 1515 (1946) (federal minimum wage law under Fair Labor & Standards Act); *MacSuga v. County of Spokane*, 97 Wn.App. 435, 445-446, 983 P.2d 1167 (1999). The *prima facie* showing must be supported by a preponderance of the evidence. A preponderance of the evidence is that evidence which, when fairly considered, produces the stronger impression, has the greater weight, and is the more convincing as to its truth when weighed against the evidence in opposition thereto. *Yamamoto v. Puget Sound Lbr. Co.*, 84 Wash. 411, 146 Pac. 861 (1915).
7. RCW 49.46.010(7) defines "wage" as:

[C]ompensation due to an employee by reason of employment, payable in legal tender of the United States or checks on banks convertible into cash on demand at full face value, subject to such deductions, charges, or allowances as may be permitted by rules by director.

RCW 49.46.010(7).
8. An employer is required to pay overtime when an employee works over 40 hours in a work week. RCW 49.46.130(1). The overtime rate is not less than one and a half times the regular rate at which the worker is employed. *Id.*

9. Hours worked means all hours which the worker is authorized or required by the business to be on the premises or at a prescribed work place. This could include travel time, training, and meeting time, wait time, on-call time, and time for putting on and taking off uniforms and also may include meal periods. RCW 49.48 and 49.46 and 49.52.

10. The Department's Administrative Policy ES.C.2 states in part:

"Hours Worked" means all hours during which the employee is authorized or required, known or reasonably believed by the employer to be on duty on the employer's premises or at a prescribed work place. An analysis of "hours worked" must be determined on a case-by-case basis, depending on the facts. See WAC 296-126-002(8).

The Department's interpretation of "hours worked" means all work requested, suffered permitted or allowed . . . "Hours worked" includes, for example a situation where an employee may voluntarily continue to work at the end of the shift. The employee may desire to finish an assigned task or may wish to correct errors, prepare time reports or other records. The reason or pay basis is immaterial. If the employer knows or has reason to believe that the employee is continuing to work, such time is working time.

An employer may not avoid or negate payment of regular or overtime wages by issuing a rule or policy that such time will not be paid or must be approved in advance. If the work is performed, it must be paid. It is the employer's responsibility to ensure that employees do not perform work that the employer does not want performed.

11. Under the FLSA, the employer is liable if it knew or should have known the employee was performing uncompensated work. *Forrester v. Roth's I.G.A. Foodliner, Inc.*, 646 F.2d 413, 414 (9th Cir. 1981); *Davis v. Food Lion*, 792 F.2d 1274, 1276 (4th Cir.1986). "If an employer establishes a reasonable process for an employee to report uncompensated work time the employer is not liable for non-payment if the employee fails to follow the established process," because the employee has prevented the employer from "knowing its obligation to compensate the employee and thwarts the employer's ability to comply with the FLSA." *White v. Baptist Memorial Health Care Corporation*, 699 F.3d 869 (6th Cir.2012).

12. There is no evidence that the AICC ever agreed to pay any of its workers, including the Appellant, overtime pay. To the contrary, there is evidence of a specific written policy that it does not allow employees to work overtime without approval from the employee's supervisor. Moreover, the employees, current director, and former director all credibly and consistently testified that the AICC does not allow employees to work overtime without approval from

the employee's supervisor and that no employee's request to work overtime has ever been approved. Instead, employees are required to take time off for overtime worked in order to off-set the number of overtime hours.

13. The Appellant was informed by AICC repeatedly that she was not to work more than forty hours per week, that her assigned work must be performed within those hours, and that she was to account only for work performed that she was assigned to perform by AICC, not volunteer work she chose to perform to support the AICC. Appellant was also aware of the written policy of AICC that she was to obtain approval for working overtime if she intended to claim payment for the work.
14. Regardless of the AICC policies and the Appellant's knowledge and understanding of the policies, the AICC has a reasonable process for reporting overtime hours worked. The AICC provided its employees with time sheets for the employees to fill out and for the employee's supervisor to sign. Because Appellant did not submit to AICC time sheets that included overtime hours during the period at issue, the Appellant has failed to show that AICC knew or should have known that she was working overtime, and how much overtime she was working, during the period at issue.
15. Granted, the Appellant submitted two timesheets that included a claim for hours worked over forty hours in a week. (Exhibits 13, pp.48-51.) However, as found above, the Appellant's testimony and documentation lacks any credibility and is inconsistent to such a degree that neither the AICC nor the undersigned can verify that the Appellant actually worked the overtime hours she claimed she worked.
16. Also the Appellant's claims that she is owed overtime pay for performing tasks at Thursday night community dinners, holiday dinners, funerals, and other weekend events, lack merit. It is clear that the AICC, its employees, and its volunteers all considered participation in these events to be a donation of time as a volunteer. There is no evidence presented by the Appellant that AICC, a non-profit organization that depends heavily on the donation of time by its members for its success, ever assigned Appellant, much less any other employee, to work at events outside their assigned employment tasks.
17. While the Appellant certainly should be recognized for her good work and significant dedication to the AICC over a long period, it is clear from the testimony and evidence that Appellant does not have a bona fide dispute with the AICC regarding overtime hours worked and presented no credible or corroborated evidence to support her claim. Instead, the evidence presented showed that the dispute between the Appellant and AICC centered on a fundamental disagreement about the potential money AICC could earn from DSHS with the Visitation Program and how that money should be spent on wages for employees. Such an internal employment dispute is not within the

purview of the Department for resolution as it does not implicate the overtime wages Appellant may or may not be entitled to for hours actually worked.

18. Based on the posture of the evidence presented and the AICC's reasonable process for reporting, the Department's August 12, 2014 Determination of Compliance must be affirmed.

6. INITIAL ORDER

1. The Department Labor and Industries' August 12, 2014, Determination of Compliance is AFFIRMED.

Dated: Tuesday November 24, 2015.



Courtney Beebe
Administrative Law Judge
Office of Administrative Hearings

PETITION FOR REVIEW

Any party that disputes this Initial Order may file a Petition for Administrative Review with the Director of the Department of Labor and Industries.² A Petition for Administrative Review may be mailed to the Director or delivered to the Director at the Department's physical address listed below.

Mailing Address:

Director
Department of Labor and Industries
PO Box 44001
Olympia, WA 98504-4001

Physical Address:

Director
Department of Labor and Industries
7273 Linderson Way SW
Tumwater, WA 98501

Whether you mail or deliver the Petition for Administrative Review, the Director *must actually receive* the Petition for Administrative Review during office hours at the Director's office within 30 days of the date this Initial Order was mailed to the parties. Part of filing a Petition is providing copies to the other parties at the same time.

If the Director does not receive a Petition for Administrative Review within 30 days from the date of the Initial Order, the Initial Order shall become final with no further right to appeal.³

If you timely file a Petition for Administrative Review, the Director will conduct an administrative review under chapter 34.05 RCW.

CERTIFICATE OF MAILING IS ATTACHED

² RCW 49.48.084 and RCW 34.05.464.

³ RCW 49.48.084 and Chapter 34.05 RCW.

CERTIFICATE OF SERVICE FOR OAH DOCKET NO. 2014-LI-0233

I certify that true copies of this document were served from Tacoma, Washington upon the following as indicated:

<p>Carolyn Werre 823 E. North Avenue Spokane, WA 99207</p>	<p><input checked="" type="checkbox"/> First Class Mail, Postage Prepaid <input checked="" type="checkbox"/> Certified Mail, Return Receipt <input type="checkbox"/> Hand Delivery via Messenger <input type="checkbox"/> Campus Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> E-mail</p>
<p>Department of Labor and Industries Amanda J. Goss, AAG 800 Fifth Avenue, Suite 2000 Seattle, WA 98104</p>	<p><input checked="" type="checkbox"/> First Class Mail, Postage Prepaid <input checked="" type="checkbox"/> Certified Mail, Return Receipt <input type="checkbox"/> Hand Delivery via Messenger <input type="checkbox"/> Campus Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> E-mail</p>
<p>American Indian Community Center Assoc. Francis Devereaux 801 East 2nd Avenue Spokane, WA 99202</p>	<p><input checked="" type="checkbox"/> First Class Mail, Postage Prepaid <input checked="" type="checkbox"/> Certified Mail, Return Receipt <input type="checkbox"/> Hand Delivery via Messenger <input type="checkbox"/> Campus Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> E-mail</p>
<p>Brian P. McClatchey McClatchey Law Firm, PLLC 7 South Howard St. Suite 214 Spokane, WA 99201</p>	<p><input checked="" type="checkbox"/> First Class Mail, Postage Prepaid <input checked="" type="checkbox"/> Certified Mail, Return Receipt <input type="checkbox"/> Hand Delivery via Messenger <input type="checkbox"/> Campus Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> E-mail</p>

Date: Tuesday, November 24, 2015

OFFICE OF ADMINISTRATIVE HEARINGS

Julie Wescott

Julie Wescott
Legal Assistant 2