

DIRECTOR OF THE DEPARTMENT OF LABOR & INDUSTRIES
STATE OF WASHINGTON

In re: PEACHSTATE HEALTH
MANAGEMENT, LLC dba AEON
CLINICAL LABORATORIES & HANIF
ROSHAN and SPOUSE and MARITAL
COMMUNITY THEREOF,

Citation and Notice of Assessment No.
W-612-17

OAH Docket No. 09-2017-LI-00552

No. 2018-WPA-022

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 Initial Order served on April 23, 2018, having considered the petition for administrative review filed by Peachstate Health Management, LLC (the Appellant), briefing submitted to the Director's Office, and having reviewed the record created at hearing, issues this Director's Order.

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 April 23, 2018.

2. On May 15, 2018, the Appellant timely filed a petition for administrative review with the Director.

3. The Director adopts and incorporates the Initial Order's findings of facts No. 4.1 through 4.3, and 4.5 through 4.23.

4. The Director adopts and incorporates the Initial Order's "Issues," the "Order Summary," and the "Hearing" summary.

5. Peachstate Health Management, LLC dba AEON Clinical Laboratories (Peachstate) is a laboratory service provider based out of Georgia. Mr. Roshan is the founder, CEO, and Chairman of Peachstate.

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. I have considered the findings and conclusions of the Initial Order, which correctly analyzes the legal issues in this appeal, and adopt and incorporate all the Initial Order's conclusions of law and "initial order" section.

III. DECISION AND ORDER

Consistent with the above Findings of Fact and Conclusions of Law, the Citation and Notice of Assessment and Amended Citation and Notice of Assessment is affirmed. The Initial Order of April 23, 2018 is incorporated by reference herein.

1. Payment of wages. See Citation and Notice of Assessment for payment information and the effect of the failure to pay wages and interest. The Appellant is ordered to pay wages to Scott Collins in the amount of \$9,616.00. The Appellant is also ordered to pay interest in the amount of one percent per month under RCW 49.48.083(2) for these wages. The

Appellant is ordered to make these payments within thirty days of the date of service of this final Director's Order.

2. Payment of Civil Penalty: The Appellant is ordered to pay the Department a penalty in the amount of \$1000. *See* Citation and Notice of Assessment for payment information.

DATED at Tumwater, Washington this 19 day of October 2018.



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 by emailing to DirectorAppeal@LNI.WA.GOV, 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 Deck, hereby declare under penalty of perjury under the laws of the State of Washington, that the DIRECTOR'S ORDER was mailed on the 19 day of October 2018, via U.S. Mail, postage prepaid, to the following:

Paul S. Suda
Peachstate Health Management, LLC
dba AEON Global Health Laboratories
2225 Centennial Drive
Gainsville, GA 30504

Heather Leibowitz
Assistant Attorney General
Attorney General's Office
800 Fifth Ave., Ste. 2000
Seattle, WA 98104

Hanif Roshan and Spouse
Peachstate Health Management, LLC
dba AEON Global Health Laboratories
2225 Centennial Drive
Gainsville, GA 30504

Scott Collins
4004 58th Place SW
Seattle, WA 98116

DATED this 19 day of October 2018, at Tumwater, Washington.



Lisa Deck

**WASHINGTON STATE
OFFICE OF ADMINISTRATIVE HEARINGS**

In the matter of:

Peachstate Health Management, LLC
dba AEON Clinical Laboratories,

Appellant/Employer.

Docket No. 09-2017-LI-00552

INITIAL ORDER

Agency: Labor and Industries

Program: Wage Payments

Agency No. W-612-17

1. ISSUES

- 1.1. Did Peachstate Health Management LLC dba AEON Clinical Laboratories violate RCW 49.48.010 by failing to pay Scott Collins for 200 hours worked at the regular rate of \$100,000.00 per year?
- 1.2. If so, what wages are owed?
- 1.3. If so, under RCW 49.48.010 and RCW 49.15.083(2), what is the interested owed?
- 1.4. If so, under RCW 49.48.083 what penalties should be assessed?
- 1.5. Is it proper for the Department to hold Mr. Roshan personally liable for wages owed?

2. ORDER SUMMARY

- 2.1. Peachstate Health Management LLC dba AEON Clinical Laboratories violated RCW 49.48.010 by failing to pay Mr. Collins for 200 hours of work performed at the rate of \$100,000.00 per year. Peachstate is liable for \$9,616.00 in unpaid wages.
- 2.2. Peachstate shall pay interest in the amount of 1% of the unpaid wages for each month these wages are unpaid and to accrue at the rate of 1% for each month that the interest is unpaid – all calculated accordingly by the Department.
- 2.3. Peachstate shall pay a \$1,000.00 penalty for willfully violating the wage payment requirements of RCW 49.48.010.
- 2.4. The Department of Labor and Industries may impose personal liability upon employer's CEO Mr. Roshan and Spouse, and the Marital Community Thereof, as an Individual, for the unpaid wages, interest, and penalty recited above.

3. HEARING

- 3.1. Hearing Date: February 21, 2018
- 3.2. Administrative Law Judge: Dawn Bettinger

3.3. Appellant/Employer: Peachstate Health Management, LLC dba AEON
Global

3.3.1. Representative: Paul Suda, Attorney

3.3.2. Witnesses:

3.3.2.1. Hanif Roshan, Chief Executive Officer and Chairman of Peachstate Health Management LLC dba AEON Clinical Laboratories

3.4. Agency: Labor and Industries

3.4.1. Representative: Heather Leibowitz

3.4.2. Witnesses:

3.4.2.1. Scott Collins, Wage Claimant

3.4.2.2. Alfredo DiTolla, Department of Labor and Industries Industrial Relations Agent.

3.5. Exhibits: Exhibits 1 through 21 were admitted with the exception of Exhibit 7 pages 21-23, which were excluded as being duplicative of Exhibit 2. Exhibit 7 pages 9-20 and pages 50-51 were also excluded.

4. FINDINGS OF FACT

I find the following facts by a preponderance of the evidence:

Jurisdiction

4.1. On May 5, 2017, the Department of Labor and Industries ("Department") issued a Citation and Notice of Assessment to Peachstate Health Management LLC dba AEON Clinical Laboratories and to Shawn Desai individually alleging failure to pay wages to Scott Collins for the period of May 4, 2016 to June 8, 2016.

4.2. Employer filed a timely appeal.

4.3. On January 10, 2018, the Department amended the Citation and Notice of Assessment to remove Shawn Desai from individually liability, and alleged that Hanif Roshan is individually liable after additional information was disclosed.

Peachstate Health Management LLC dba AEON Clinical Laboratories and Scott Collins

4.4. Peachstate Health Management LLC dba AEON Clinical Laboratories ("Peachstate") is a laboratory service provider based out of Georgia. Mr. Roshan is the founder, CEO and Chairman of Peachstate. While Mr. Roshan was the CEO and chairman of Peachstate, Mr. Roshan cannot be responsible to know what employees are doing. Testimony Mr. Roshan.

4.5. Peachstate hired Scott Collins as the Vice President of Sales for the Northwest region effective September 22, 2015. Mr. Collins' direct supervisor was

Mr. Richard Hersperger. Mr. Hersperger sent Mr. Collins an offer letter which was signed by Mr. Collins on September 22, 2015. Mr. Roshan and Mr. Hersperger participated in the interview of Mr. Collins. Ex 2 pgs 6-8.

- 4.6. Mr. Collins' salary was \$100,000.00 per year with potential for commission payments. Mr. Collins received his pay via direct deposit and did not receive a formal statement of income from Peachstate. Ex 2 pg 6 and Testimony of Mr. Collins.
- 4.7. A salary structure review was set for the "60, 90 and 120 day marks then every quarter thereafter." Ex 2 pg 7. These salary reviews did not happen. Testimony Mr. Collins.
- 4.8. Mr. Collin's duties were to help develop a sales force in the Northwest, to reach out to existing independent sales agents, and to bring in sales. Mr. Collins did not have a set daily work schedule, for example 8 am to 5 pm. Mr. Collins would sometimes work more than 40 hours a week due to the nature of sales opportunities. Because Mr. Collins collected a salary he did not keep track of his actual hours worked. When asked by the Department to reconstruct his hours, Mr. Collin's estimated that he worked 200 hours from the date of the first missed paycheck in May 2016 to the time he stopped working for Peachstate in June 2016. This means that if Mr. Collins worked every day during the weekday he worked a total of 8 hours a day. Given Mr. Collins testimony about sometimes working more than an 8-hour day due to the nature of being in sales, this reconstruction is reasonable. Testimony Mr. Collins.
- 4.9. Mr. Hersperger held weekly sales meetings. Mr. Roshan would participate 50-60% of the time. During the sales meetings, each sales person discussed what projects were set up and what confirmed sales if any were made. March 2016 was the last sales meeting. Testimony Mr. Collins.
- 4.10. Mr. Collins did not produce any sales. Mr. Roshan expressed his frustration with Mr. Collins' lack of sales numbers and contends that he told Mr. Collins in a phone call that Mr. Collins had the month of April 2016 to produce sales or he would be fired. Mr. Collins disputes that he every had a phone call with Mr. Roshan let alone being told he would be fired. Testimony Mr. Roshan and Mr. Collins.
- 4.11. Mr. Roshan later told Mr. Collins in a phone call that he was fired. Mr. Roshan says he followed up the phone call with an email and a text message also telling Mr. Collins he was fired. Testimony of Mr. Roshan and Mr. Collins.
- 4.12. No evidence of the email or the text message from Mr. Roshan to Mr. Collins was produced. The lack of evidence of this email or text messages coupled with

Mr. Roshan's testimony of not knowing what the employees were doing despite being the CEO of the company, is not credible.

- 4.13. Mr. Collins did not return his work-issued lap top. Mr. Roshan assumed that the laptop was not returned because once a salaried employee is terminated, that employee then has the option to be a 1099 independent contractor being paid only on commissions. Testimony of Mr. Roshan.
- 4.14. No employment documents to substantiate the change in employment status of Mr. Collins were submitted.
- 4.15. Mr. Collins stopped receiving the direct deposits in May 2016. Mr. Collins after two missed paychecks contacted Mr. Hersperger about the non-payment. Ex 7.
- 4.16. Despite not receiving his paycheck, Mr. Collins continued to work and sent account and project information back to support staff. Ex 7 pgs 30-35.
- 4.17. Mr. Collins also worked on a project called Top Co. Mr. Collins and Mr. Hersperger emailed about the project in May. A presentation had been scheduled for June 2016. Testimony of Mr. Collins and Ex. 7 pg 37-45.
- 4.18. On May 24, 2016 Mr. Collins sent an email to Mr. Hersperger, Mr. Henry, and Mr. Blanchard again asking about his status since he had not received any payment of his salary. Mr. Collins indicated that he would continue to work as usual until he was given confirmation that his status changed. Mr. Hersperger responded to this email and said that he would call Mr. Collins. Mr. Hersperger did not call Mr. Collins. Testimony Mr. Collins and Ex 7 pg 36.
- 4.19. On May 25, 2016 Mr. Collins again emailed Mr. Hersperger regarding his status and how to proceed on the Topco account. Again Mr. Hersperger indicated he would call Mr. Collins but did not. Ex 7 pg 44.
- 4.20. On June 3, 2016 Mr. Collins sent another email to Mr. Hersperger, Mr. Henry, Mr. Blanchard and also included the attorney for Peachstate Mr. Paul Suda, again asking about his status and why he had not been paid. This email also included a demand for payment of wages and to clarify his status with the company. Mr. Collins then stopped working on all projects. Ex 7 pg 47.
- 4.21. At no time did anyone from Peachstate tell Mr. Collins to stop working. Testimony Mr. Collins.
- 4.22. At all times, Mr. Roshan controlled payroll and employment for Peachstate. Testimony Mr. Roshan.
- 4.23. Mr. Collins worked on projects for Peachstate and worked to make sales until June 6, 2016. After two pay cycles have passed and emails asking about his

status went unanswered by his employer, Mr. Collins stopped working.

5. CONCLUSIONS OF LAW

Based upon the facts above, I make the following conclusions:

Jurisdiction

- 5.1. The Office of Administrative Hearings has jurisdiction over the persons and subject matter of this case under RCW 34.05, RCW 49.46, RCW 49.48, and RCW 49.52.

Burden of Proof

- 5.2. Under the Wage Payment Act ("WPA"), the Department 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.
- 5.3. 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).
- 5.4. "If the employer fails to keep records, the burden is on the employer to prove the claimed hours were not worked." *MacSuga v. County of Spokane*, 97 Wn. App. 435, 445, 983 P.2d 1167 (1999). If the employee shows by "reasonable inference" the number of hours worked, then the burden shifts to the employer. *Id.* at 445 (citing *Anderson v. Mt. Clemens Pottery Co.*, 328 U.S. 680, 66 S. Ct. 1187, 90 L.Ed 1515 (1946)).

Applicable Laws and Analysis

- 5.5. 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.
- 5.6. Wage Payment Act, RCW 49.48 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.

- 5.7. 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. RCW 49.48.083.
- 5.8. 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).
- 5.9. 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.
- 5.10. 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.
- 5.11. 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. WAC 296-126-002(8). 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, 49.46 and 49.52.
- 5.12. It is the employer's responsibility to keep records regarding employee hours. Employers shall "make, keep, and preserve such records of the persons employed and of the wages, hours, and other conditions and practices of employment. RCW 49.46.040(3).
- 5.13. When the employee does not keep records, the Department allows for reasonable reconstruction of hours. "[T]he employee must first show by reasonable inference the number of hours worked to shift the burden onto the employer to provide otherwise." *MacSuga v. Cy. of Spokane*, 97 Wn. App. 435, 445, 983 P.2d 1167 (1999).
- 5.14. Mr. Collins reasonably reconstructed his hours worked. Peachstate did not keep records of hours Mr. Collins worked and did not pay Mr. Collins for 200 hours worked in violation of RCW 49.48.010.

Interest on Unpaid Wages

- 5.15. Unpaid wages may accrue interest at the rate of 1% of the unpaid wage amount until payment is received by the Department, calculated from the first date wages were owed to the employee. RCW 49.48.083.
- 5.16. The Department correctly calculated interest up to the time it issued Citation and Notice of Assessment No. W-612-17. Interest will continue to accrue at the same rate until such time as Peachstate pays the unpaid wages. Peachstate is responsible for paying this interest under RCW 49.48.083

Penalty

- 5.17. "If the department determines that the violation of the wage payment requirement was a willful violation, the department also may order the employer to pay the department a civil penalty" of ten percent of the total unpaid wages or \$1,000.00, whichever is more, but not more than \$20,000.00. RCW 49.48.083(3).
- 5.18. RCW 49.48.082(11) defines "willful" as a "knowing and intentional action that is neither accidental nor the result of a bona fide dispute . . .". See also, *Schilling v. Radio Holdings, Inc.*, 136 Wn.2d 152, 159-60, 961 P.2d 371 (1998) (willful means the result of a knowing and intentional action); *Morgan v. Kingen*, 166 Wn.2d 526, 534, 210 P.3d 995 (2009) (willful means volitional, knowledgeable, intentional).
- 5.19. Mr. Collins was not paid for work done in May 2016. Mr. Collins sent numerous emails to his immediate supervisor Mr. Hersperger to ask about his status in the company and to ask why he was not paid. Those emails were received and acknowledged, and despite this, Mr. Collins was never given any answers or paid. After a month of continued work, Mr. Collins sent an email on June 3, 2016 demanding payment and demanding to know his status. This email also included Mr. Suda, the attorney for Peachstate. This email also went unanswered. Peachstate willfully failed to pay Mr. Collins in violation of RCW 49.48.083. The Department properly assessed the penalty of \$1,000.00.

Personal Liability of Mr. Roshan

- 5.20. Personal liability for wage claim violations is imposed under RCW 49.52.050. Liability is imposed on employers, officers, vice principals or agents of any employer for violation of wage payment laws, including the violations at issue here. A vice principal or agent must have the authority to make decisions regarding the payment of wages, and that person must have acted pursuant to that authority in withholding the wages to which the worker is lawfully entitled or individual liability cannot be imposed. *Ellerman v. Centerpoint Prepress Inc.*, 143 Wn.2d 514, 22 P.3d 795 (2001).

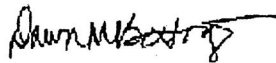
5.21. Mr. Roshan is the CEO and Chairman of Peachstate. Mr. Roshan participated in the hiring of Mr. Collins. Mr. Roshan also participated in the weekly sales meetings ran by Mr. Hersperger. Mr. Roshan had control over payroll and the hiring and firing of employees. Mr. Roshan claims to have fired Mr. Collins as well via phone, email and text message despite no evidence of those documents. Thus, for purposes of RCW 49.48.010, Mr. Roshan was an employer. The Department may impose personal liability on Mr. Roshan for wages owed to Mr. Collins.

6. INITIAL ORDER

IT IS HEREBY ORDERED THAT:

- 6.1. The Department's Notice of Citation and Assessment W-612-17 is **AFFIRMED**. Peachstate violated RCW 49.48.010 by failing to pay Mr. Collins for 200 hours worked. Peachstate is liable for \$9,616.00 in unpaid wages.
- 6.2. Peachstate shall pay interest in the amount of 1% of the unpaid wages for each month these wages are unpaid and to accrue at the rate of 1% for each month that the interest is unpaid – all calculated accordingly by the Department.
- 6.3. Peachstate shall pay a \$1,000.00 penalty for willfully violating the wage payment requirements of RCW 49.48.010.
- 6.4. The Department of Labor and Industries pay impose personal liability upon Mr. Roshan and Spouse, and the Marital Community Thereof, as an Individual, for the unpaid wages, interest, and penalty recited above.

Issued from Tacoma, Washington on the date of mailing.



Dawn Bettinger
Administrative Law Judge
Office of Administrative Hearings

CERTIFICATE OF SERVICE ATTACHED

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.¹ You may e-mail your Petition for Administrative Review to the Director at directorappeal@lni.wa.gov. You may also mail or deliver your Petition for Administrative Review 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:

7273 Linderson Way SW
Tumwater, WA 98501

If you e-mail your Petition for Administrative Review, please do not mail or deliver a paper copy to the Director.

Whether you e-mail, 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. You must also provide a copy of your Petition for Administrative Review 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.²

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

¹ RCW 49.48.084 and RCW 34.05.464.

² RCW 49.48.084 and Chapter 34.05 RCW.

CERTIFICATE OF SERVICE FOR OAH DOCKET NO. 09-2017-LI-00552

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

Peachstate Health Management, LLC dba AEON Global Health Laboratories c/o Paul Suda 2225 Centennial Drive Gainsville, WA 30504 Appellant/Employer 7015 0640 0001 8223 8829	<input checked="" type="checkbox"/> First Class Mail <input checked="" type="checkbox"/> Certified Mail, Return Receipt 7015 0640 0001 8223 8829 <input type="checkbox"/> Hand Delivery via Messenger <input type="checkbox"/> Campus Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> E-mail
Paul Suda 2225 Centennial Drive Gainsville, GA 30504 Appellant Representative 7015 0640 0001 8223 8836	<input checked="" type="checkbox"/> First Class Mail <input checked="" type="checkbox"/> Certified Mail, Return Receipt 7015 0640 0001 8223 8836 <input type="checkbox"/> Hand Delivery via Messenger <input type="checkbox"/> Campus Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> E-mail
Heather Leibowitz, AAG Office of the Attorney General MS: TB-14 800 Fifth Ave., Ste. 2000 Seattle, WA 98104 Agency Representative	<input type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail, Return Receipt <input type="checkbox"/> Hand Delivery via Messenger <input checked="" type="checkbox"/> Campus Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> E-mail
Scott Collins 4004 58th PL SW Seattle, WA 98116 Intervenor/Wage Claimant 7015 0640 0001 8223 8843	<input checked="" type="checkbox"/> First Class Mail <input checked="" type="checkbox"/> Certified Mail, Return Receipt 7015 0640 0001 8223 8843 <input type="checkbox"/> Hand Delivery via Messenger <input type="checkbox"/> Campus Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> E-mail

Date: Monday, April 23, 2018

OFFICE OF ADMINISTRATIVE HEARINGS



Ricci Frisk
 Legal Administrative Manager