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The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

SUSAN SOTO PALMER, et. al.,

Plaintiffs,

v.

STEVEN HOBBS, et. al.,

Defendants,

and

JOSE TREVINO, ISMAEL CAMPOS, and ALEX YBARRA,

Intervenor-Defendants.

Case No.: 3:22-cv-05035-RSL

Judge: Robert S. Lasnik

PLAINTIFFS' REPLY IN SUPPORT OF MOTION TO BIFURCATE AND TRANSFER, STRIKE, AND/OR DISMISS INTERVENORS' CROSSCLAIM

NOTE FOR MOTION CALENDAR: November 25, 2022

INTRODUCTION

This Court should grant Plaintiffs' Motion to Bifurcate and Transfer, Strike and/or Dismiss Intervenors-Defendants' Crossclaim. Intervenor-Defendants' crossclaim is 1) duplicative of a claim that Intervenor-Defendants' lead counsel already brought in *Garcia et al. v. Hobbs*, 2) jurisdictionally interferes with these Plaintiffs' Section 2 Voting Rights Act (VRA) claim, and 3) if Intervenor-Defendants' crossclaim should survive at all, it should be transferred and consolidated with the *Garcia* case. Finally, when considering how to handle Intervenor-Defendants' crossclaim the Court should consider that recently discovered evidence demonstrates that counsel for the Garcia Plaintiffs, the Intervenor-Defendants, and at least one member of the Washington Redistricting Commission have been coordinating legal machinations since at least

1 before the *Garcia* suit was filed with design to frustrate the enforcement of the federal Voting
2 Rights Act. Remarkably, Commissioner Paul Graves coordinated the funding and filing of the
3 racial gerrymandering legal challenge against the plan ***he drew.*** The purpose of that challenge is
4 certainly not to protect Latino voting rights. Rather, the goal is to *worsen* the cracking of the
5 Yakima area Latino voters beyond the dilutive district Commissioner Graves drew. As Plaintiffs
6 will prove at trial in this case, the effort led by Commissioner Graves was an intentional and
7 concerted effort to dilute the voting strength of Yakima area Latino voters. His coordinated effort
8 to interfere with Plaintiffs' Section 2 case by filing a competitor lawsuit purporting to challenge
9 the constitutionality of ***his own conduct*** underscores that discriminatory intent. The Court should
10 not permit this bad faith behavior to interfere with the adjudication of this case.

11

12 **ARGUMENT**

13 Intervenor-Defendants' crossclaim should be dismissed and/or bifurcated and transferred.

14 **I. Intervenor-Defendants, the *Garcia* Plaintiffs, and Washington Redistricting**
15 **Commissioner Paul Graves are coordinating to frustrate this enforcement action**
16 **under the Voting Rights Act.**

17 Recent document production reveals that Intervenor-Defendants, lead counsel for the
18 Garcia Plaintiffs Drew Stokesbary, and Washington Redistricting Commissioner Paul Graves have
19 been coordinating litigation strategies since at least March 4, 2022. *See* Exhibit 1. Although
20 Commissioner Graves and others have been less than diligent in producing ESI, bits and pieces
21 from produced communications reveal that the filing of the *Garcia* case, the subsequent effort to
22 intervene in this case, and then the effort to file a crossclaim in this case are part of coordinated
23 efforts with Commission Graves to prevent compliance with Section 2 of the Voting Rights Act.
24 At his November 21, 2022 deposition, Washington Redistricting Commissioner Joseph "Joe" Fain
25 was examined with two exhibits which show that Commissioner Fain, Commissioner Graves, the
26

1 Washington State Republican Party, Adam Kincaid at the National Republican Redistricting Trust,
2 and Counsel Andrew Stokesbary have been working together to craft a legal case *against the*
3 *version of district 15 that they drew and voted to approve*.

4 First, there is a retainer agreement showing Commissioners Fain and Graves, along with
5 the Washington State Republican Party, hired the law firm of Davis Wright Tremaine, LLP in
6 November 2021 to "prepare a memorandum concerning the Voting Rights Act's application to
7 proposed districts in and around Yakima, and such other similar work as the parties direct." *See*
8 Exhibit 2. After receiving the memo, which contained no factual or statistical analysis of voting
9 patterns in the Yakima Valley and was rife with legal errors, Commissioners Fain and Graves
10 worked diligently to prevent the drawing of an effective district for Latinos and in fact themselves
11 pushed to ensure that the 15th Legislative District was made up of a bare majority of Latino citizens
12 of voting age (CVAP) but still would not elect a Latino candidate or choice. *See* Expert Report of
13 Dr. Henry Flores, Dkt. 104. Email communications from Commissioner Graves and staffers for
14 the Commission, as well as testimony from staffers and Commissioner Pinero Walkinshaw, further
15 demonstrate that Graves intentionally pushed to have district 15 over 50% Latino CVAP, but
16 Republican performing, to further his litigation interests.

17 Further, Commissioner Graves was directly involved in coordinating the funding and filing
18 of the *Garcia* case, which challenges the district *he drew* and that *he demanded* meet a precise
19 50.02% Latino CVAP—a strategy he thought would insulate it from liability in a Section 2 lawsuit.
20 After Plaintiffs filed that lawsuit, Commissioner Graves went to work to stand up a competing
21 legal challenge with the aim of undermining Latino voting strength even further. Commissioner
22 Graves, on March 4, 2022 wrote, "Rob and David are lawyers at Davis Wright Tremaine here in
23 Seattle, getting up to speed on the redistricting litigation. Adam runs the National Republican

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redistricting trust, and it's [sic] foundation, the Fair Lines America Foundation, which I believe can serve as a financing vehicle for this work. I'll let you three connect." Exhibit 1. Intervenor-Defendants and *Garcia* Counsel State Representative Stokesbary was then forwarded the email by Robert McGuire of Davis Wright Tremaine on March 7, 2022. Just eight days after Commissioner Graves connects these lawyers with Mr. Stokesbary, on March 15, the *Garcia* case was filed, which complains that the commission's map unlawfully considered race when it drew a 50% majority Latino district. But the complaint leaves out that Graves, working with these lawyers, intentionally worked to ensure the commission map included a Latino CVAP over 50% in the 15th district so that he and his legal team could leverage that fact in filing Shaw claims like they filed with strawmen Plaintiffs in the *Garcia* case and then with the Intervenors in this case. *See id.* This conduct is intentional discrimination, not racial gerrymandering.

In their attempt to bring the duplicative and coordinated claim in this case, Intervenor-Defendants make the same argument as made by the coordinated *Garcia* Plaintiffs: "[d]iscovery has since shown that Legislative District 15 ("LD 15") was an unconstitutional racial gerrymander."[1] These claims too rely on the 50% CVAP district that Commission Graves included to setup their Shaw claim, and the Intervenor-Defendants too are represented by Mr. Stokesbary.

[1] This claim is peculiar—Mr. Stokesbary claims that he only now knows of the information needed to file the crossclaim despite filing the exact same claim in *Garcia* prior to discovery.

1 Given these facts, the Court should not allow the Intervenor-Defendants to obstruct the orderly
2 administration and trial of this case.

3 **II. Plaintiffs' Section 2 VRA Claim Must Be Disposed of Before Any Constitutional**
4 **Claims**

5 In their opposition, Intervenor-Defendants acknowledge that the resolution of their crossclaim
6 is dependent on Plaintiffs' VRA claims and bifurcation may be warranted. *See* Dkt. # 109 at 3-4.
7 If Plaintiffs prevail on their VRA claim, Intervenor-Defendants' crossclaim and the *Garcia*
8 plaintiff's claim will become moot. Indeed, a review of Plaintiffs' expert reports (detailing the
9 presence of the *Gingles* factors, the totality of circumstances, and the intentional discrimination
10 that pervaded the adoption of LD 15) illustrates that it is *likely* that their Section 2 claims will
11 indeed prove dispositive. *See* Dkt. # 104 (expert reports of Dr. Collingwood, Dr. Estrada, and Dr.
12 Flores).

13 The evidentiary burden in a Section 2 VRA case differs from that of a racial gerrymandering
14 claim. Under Section 2, a party must demonstrate that minority voting strength is being diluted
15 and that the political process is "not equally open to participation by [a racial minority group] in
16 that its members have less opportunity than other members of the electorate to participate in the
17 political process and to elect representatives of their choice." 52 U.S.C. § 10301(b). In *Thornburg*
18 *v. Gingles*, 478 U.S. 30 (1986), the Supreme Court identified three necessary preconditions ("the
19 *Gingles* preconditions") for a claim of vote dilution under Section 2: (1) the minority group must
20 be "sufficiently large and geographically compact to constitute a majority in a single-member
21 district"; (2) the minority group must be "politically cohesive"; and (3) the majority must vote
22 "sufficiently as a bloc to enable it . . . usually to defeat the minority's preferred candidate." 478
23 U.S. at 50-51. The Supreme Court has directed courts to consider the non-exhaustive list of factors
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1 found in the Senate Report on the 1982 amendments to the Voting Rights Act in determining
2 whether, under the totality of the circumstances, the challenged electoral device results in a
3 violation of Section 2. The Senate Factors include: (1) the history of official voting-related
4 discrimination in the state or political subdivision; (2) the extent to which voting in the elections
5 of the state or political subdivision is racially polarized; (3) the extent to which the state or political
6 subdivision has used voting practices or procedures that tend to enhance the opportunity for
7 discrimination against the minority group; (4) the exclusion of members of the minority group
8 from candidate slating processes; (5) the extent to which members of the minority group bear the
9 effects of discrimination in areas such as education, employment, and health, which hinder their
10 ability to participate effectively in the political process; (6) the use of overt or subtle racial appeals
11 in political campaigns; and (7) the extent to which members of the minority group have been
12 elected to public office in the jurisdiction.
13
14 Conversely, under a claim for racial gerrymandering, a party "must show that 'race was the
15 predominant factor motivating the legislature's decision to place a significant number of voters
16 within or without a particular district'" without a compelling justification (such as compliance with
17 the VRA). *Alabama Legislative Black Caucus v. Alabama*, 575 U.S. 254, 272 (2015). The standard
18 articulated by the Supreme Court is that a plaintiff must show that the legislature or line drawers
19 subordinated traditional redistricting principals, such as ignoring "compactness, contiguity, respect
20 for political subdivisions or communities defined by actual shared interests,' *ibid*., incumbency
21 protection, and political affiliation." *Id.* at 273. As such, a racial gerrymandering claim does not
22 require any statistical or quantitative evidence that is essential in a Section 2 case. Further, the
23 principle of constitutional avoidance would nevertheless counsel against the Court adjudicating
24 the racial gerrymandering claim when the lawfulness of LD 15 can be decided on the statutory
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1 grounds raised by Plaintiffs. *See Lyng v. Nw. Indian Cemetery Protect Ass'n*, 485 U.S. 439, 445
2 (1988). When circumstances meet the *Gingles* test, map drawers are not just permitted to consider
3 race in constructing the map, *they are obligated to do so*. Stated another way, a map drawn
4 cognizant of race in order to meet the requirements of Section 2 of the Voting Rights Act is not in
5 violation of the *Shaw* series of cases.

6
7 **III. Consolidation with the *Garcia* Case Is Inappropriate and Would Prejudice Plaintiffs**

8 Consolidation of this case for discovery and trial with the *Garcia* in a single trial is
9 inappropriate and would prejudice Plaintiffs. Plaintiffs have already stated in their Motion, dkt.
10 #105, why a three-judge panel would not be able to hear Plaintiffs' statutory claims. *See id.* at 3-6
11 ("Empaneling a three-judge district court for this entire case because of Intervenors' belated
12 crossclaim would prejudice Plaintiffs because it would inject uncertainty as to the three-judge
13 district court's jurisdiction to adjudicate their case. Should Plaintiffs prevail and the State appeal,
14 the Supreme Court might determine that a three-judge district court lacked jurisdiction to decide
15 Plaintiffs' VRA claim, requiring the case to be vacated and adjudicated anew. *See, e.g.*, *Allen v.*
16 *State Bd. of Elections*, 393 U.S. 544, 560 (1969) (holding that Supreme Court has "jurisdiction
17 over an appeal brought directly from the three-judge court of only if the three-judge court was
18 properly convened")."). While the State and Intervenor-Defendants argue that a three-judge court
19 *may* have jurisdiction to hear Plaintiffs claims, the alternative in which such panel lacked
20 jurisdiction would jeopardize the ability of Plaintiffs to attain relief in time for the 2024 election,
21 causing irreparable harm to Plaintiffs, who were already denied relief in 2022. Moreover, Secretary
22 of State Hobbs noted his concern in response to Plaintiffs' motion that "thorny jurisdictional
23 issues," including the "motions practice and interlocutory appeals related to those jurisdictional
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issues has the potential to delay trial and implicate the *Purcell* principle…" Dkt. 112 at 2. Thus, Secretary Hobbs urged that the Court "strictly hold Intervenor-Defendants to their representation that their crossclaim 'will require no alteration of the Court's current Scheduling Order.'") *Id*. at 2. (citing Dkt. 109 at 3).

Additionally, the State's proposal to move trial *yet again* to June would interfere with binding commitments in June of 2023.[2] Several of Plaintiffs' counsel have scheduled trials during this period that would directly conflict with the State's proposal. There are also witness availability issues that present challenges in June. Plaintiffs counsel have worked diligently to line up the necessary trial participants while holding off end-of-school year and travel plans until after the scheduled May travel period. It is an unreasonable burden to Plaintiffs to move their trial date again, especially given the duplicative nature of the claim in Intervenor-Defendants' crossclaim and the machinations of Commissioners Graves and Fain, Intervenors' lead counsel Mr. Stokesbary, and the National Republican Redistricting Trust to obstruct this proceeding.

Finally, Intervenor-Defendants fail to respond substantively to Plaintiffs' motion to strike for failure to seek leave to file an amended pleading. Their response recited the same precedent that they cited in their untimely answer from other district courts that does not reflect practice before this Court. Furthermore, the response failed to explain why leave is merited under factors

[2] Plaintiffs fully briefed the issue of unavailability for a June trial in their Opposition to State of Washington's Motion to Modify Scheduling Order in July 2022. *See* Dkt. # 81. The Court has already taken these considerations into account when setting the new trial date for May of 2023.

considered in the Ninth Circuit. *See Desertrain v. City of Los Angeles*, 754 F.3d 1147, 1154 (9th Cir. 2014).[3]

CONCLUSION

This Court should not reward the Intervenor-Defendants for coordinating to stall out Plaintiffs claims. For the foregoing reasons, the Court should bifurcate the crossclaim, transfer it, and consolidate it with the *Garcia* case. The *Garcia* case should then be held in abeyance pending a decision on Plaintiffs' VRA claim. Alternatively, the Court should strike or dismiss Intervenor-Defendants' crossclaim.

Dated: November 25, 2022

By: /s/ Edwardo Morfin

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Ernest Herrera*
Leticia M. Saucedo*
Deylin Thrift-Viveros*
Mexican American Legal Defense
and Educational Fund

[3] Intervenors contend that Plaintiffs lacked standing to seek dismissal of their suit. But Plaintiffs' dismissal arguments related to Intervenors' standing—a jurisdictional issue this Court is required to consider regardless of whether the Secretary or the State object on that basis.

1 *Admitted pro hac vice
2 *Counsel for Plaintiffs*

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CERTIFICATE OF SERVICE

I certify that all counsel of record were served a copy of the foregoing this 25th day of November, 2022 via the Court's CM/ECF system.

/s/ Edwardo Morfin

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EXHIBIT 1

Suite 3300
920 Fifth Avenue
Seattle, WA 98104-1610

Robert J. Maguire
206.757.8094 tel
206.757.7094 fax

robmaguire@dwt.com

November 4, 2021

Washington State Republican Party
Attn: Caleb Heimlich
11811 NE 1st Street
Suite A306
Bellevue, WA 98005

Paul Graves
Washington State Redistricting Commission
1007 Washington Street SE
Olympia, WA 98105

Joe Fain
Washington State Redistricting Commission
1007 Washington Street SE
Olympia, WA 98105

Re: DWT Representation regarding Redistricting

Dear Paul, Joe, and Caleb:

Thank you for selecting Davis Wright Tremaine LLP to represent the Washington State Republican Party ("WSRP") and Paul Graves and Joe Fain, Commissioners of the Washington State Redistricting Commission, (hereinafter "Interested Parties") jointly regarding the redistricting matter. The purpose of this letter is to confirm our representation and set forth the terms on which DWT will represent you and to obtain your informed consent to the joint representation. Please review this letter and return a signed copy reflecting our agreement to the terms of this engagement.

Scope of Representation and Political Consent

We understand our representation of the Interested Parties concerns advising Commissioner Graves and Commissioner Fain concerning their work on the Washington State Redistricting Commission. Our work will include preparing a memorandum concerning the Voting Rights Act's application to proposed districts in and around Yakima, and such other similar work as the Interested Parties direct.

Please recognize that DWT is a large firm, with more than 500 lawyers around the country. We represent many clients involved in political activities with differing views. In addition, many of our lawyers are actively involved as volunteers for political committees or as volunteers for nonprofit voter groups. Some volunteers for committees might be involved in fundraising,

election monitoring, providing political strategic advice, or commenting publicly on various issues which could be involved in the issues the Committee asks us to address. In addition, some of our lawyers may be asked to provide legal services to parties, campaigns, or advocacy organizations with respect to various constitutional, business, commercial, litigation (including election litigation), and regulatory issues (including voting rights issues).

For the most part, we do not anticipate that any of these contemplated activities performed by any of our lawyers would create an impermissible conflict of interest within the meaning of the ethical rules. However, even if the interests of another committee, campaign, nonprofit voter rights group, or other entity or individual in connection with any of these contemplated activities arguably ends up being directly adverse to the Committee within the meaning of the ethical rules, you agree that the lawyer or staff performing such activity on behalf of another committee, campaign, nonprofit voter rights group, or other entity or individual may nonetheless do so, provided that (i) the contemplated activity is not substantially related to the specific issues that we are handling for the Committee; and (ii) no lawyer performing any legal work for the Committee is involved in the arguably adverse representation.

Engagement Terms

At Davis Wright Tremaine LLP we believe it is essential that our clients and we have the same understanding of the client-attorney relationship. With this in mind, enclosed for your review is a copy of our Standard Terms of Engagement for Legal Services, which describes in greater detail the basis on which we provide legal services to our clients. As supplemented by this letter, the Standard Terms of Engagement constitutes our engagement agreement. Therefore, we ask that you review it carefully and contact us promptly if you have any questions about our relationship.

Retainer

At this time we are not requesting a retainer. However, should we ask for one at some point, the retainer will be held in our trust fund until the completion of the representation and applied to the last bill. If there is the prospect for a significant amount of legal service in any period likely to incur fees and costs in excess of the retainer, we may require that the retainer be increased to an amount reasonably necessary to cover such fees and costs. For additional information about the retainer, please refer to our Standard Terms of Engagement for Legal Services.

Legal Fees

Harry Korrell, David Nordlinger and I will be the primary attorneys at Davis Wright Tremaine handling your work. Fees for services are based on a variety of factors including, for example, time and effort involved, the experience of those doing the work, the complexity of the matter and the amount involved. Of these and other considerations, the time devoted and the experience of those providing the services will be given the most weight. For example, my rate at present is

$665 per hour while Harry's rate is $795 per hour and David's rate is $465 per hour. We may involve other lawyers or paralegals, if necessary.

WSRP has agreed to pay all legal fees and associated costs we incur in providing representation to the Interested Parties. Our acceptance of the payment of fees and expenses by WSRP for our representation of you, the Interested Parties, along with WSRP will not in any way interfere with the independence of our professional judgment or with our attorney-client relationship with you, except to the extent set forth in the Joint Representation section of this letter.

Conflicts of Interest

Based on all of the information available, we do not perceive any conflicts of interest between you that would preclude the joint representation. Nor does it appear likely that any such conflict will arise in the future. If at any time, you perceive a conflict of interest in our representation of the three of you, we request that you bring that to our attention immediately. Similarly, we are obligated to tell you if we ever perceive such a conflict.

You have agreed to waive any actual or potential conflicts of interest that may arise as a result of our joint representation of the three of you. However, if a conflict or potential conflict of interest arises between the three of you in the future, and any of you wishes for DWT to withdraw from the representation, DWT will withdraw from the representation of all three of you, and will not continue to represent any individual, unless the conflict can be resolved in another mutually agreeable manner.

Confidentiality and Attorney-Client Privilege

Joint representation creates a special situation regarding the confidentiality of lawyer-client communications. Any communications you have with us will be kept confidential from the world at large, as in other lawyer-client relationships. However, because we represent all Interested Parties, we cannot keep matters relating to this joint representation confidential from any of the other Interested Parties. If any one of you requests that we keep information related to the representation confidential from the others, we may be required to withdraw.

Similarly, the evidentiary rule of attorney-client privilege does not apply as between joint clients in a joint representation. If there is a future dispute between any of you represented by DWT in in this joint engagement, the attorney-client privilege with respect to communications between any of you on the one hand, and members of DWT, on the other, in connection with the subject matter of the joint representation would be waived as to the other clients.

Material Advantages and Disadvantages

The principal advantage of joint representation is that having one lawyer represent multiple parties is generally more efficient and less costly than if each of you elected to retain your own separate counsel to represent you. This advantage is particularly applicable in the dispute

context where, as here, the legal and factual issues related to your individual disputes are similar and the legal analysis required will also be similar.

The principal disadvantage is that there is always the possibility of future conflicts arising out of this representation or otherwise as the facts of the Dispute are discovered. In such an event, we might be forced to withdraw from representation. Each of you would then be forced to hire a separate lawyer.

Please let me repeat that we are eager to represent you in this matter, and we hope that the terms of joint representation are acceptable to you. Obviously, at any time throughout our representation of any of you, you may, and if you are at all uncomfortable with our joint representation, you should, seek independent counsel. This is an important decision, and we suggest that you also consider consulting independent counsel to assist you in deciding whether to consent to the terms of this letter. There is no requirement that you do so, and whether you consult such counsel is your decision.

Otherwise, if these terms are acceptable to you, please date and sign the enclosed copy of this letter and return it to me.

We are pleased that you are entrusting its work to us, and we will do our best to provide you with prompt, high quality legal counsel. It is important for us to know how our clients feel about the services we provide. If you ever feel we are not meeting this commitment or you have other questions about our relationship, please do not hesitate to call me or our Managing Partner, Scott W. MacCormack. We look forward to serving you.

Sincerely,

Davis Wright Tremaine LLP

Robert J. Maguire

Enclosure

Consented and Agreed to:

WASHINGTON STATE REPUBLICAN PARTY

By:______________________

Its: ______________________

Consented and Agreed to:

WASHINGTON STATE REDISTRICTING COMMISSION

____

PAUL GRAVES, COMMISSIONER

Consented and Agreed to:

WASHINGTON STATE REDISTRICTING COMMISSION

____

JOE FAIN, COMMISSIONER

EXHIBIT 2

From:
Sent: Monday, March 7, 2022 8:17 AM PST
To: robmaguire@dwt.com
Subject: Re: Connect re Washington state

Drew Stokesbary
Stokesbary PLLC
1003 Main St., Suite 5
Sumner, WA 98390
www.stokesbarypllc.com

On Mar 7, 2022, at 7:48 AM, Maguire, Robert <robmaguire@dwt.com> wrote:

Rob Maguire
Davis Wright Tremaine LLP

Begin forwarded message:

From: "Maguire, Robert" <robmaguire@dwt.com>
Date: March 4, 2022 at 10:40:34 AM PST
To: Adam Kincaid <adam@thenrrt.org>
Cc: "Nordlinger, David" <DavidNordlinger@dwt.com>, harrykorrell@dwt.com
Subject: RE: Connect re Washington state

Hi Adam -

It's nice to meet you. Please let me know if you have a few minutes to talk today about Washington redistricting litigation plans. Thanks.

Rob Maguire | Davis Wright Tremaine LLP
920 Fifth Avenue, Suite 3300 | Seattle, WA 98104
Tel: (206) 757-8094 | Fax: (206) 757-7094
Email: robmaguire@dwt.com | Website: www.dwt.com

Anchorage | Bellevue | Los Angeles | New York | Portland | San Francisco | Seattle | Washington, D.C.

-----Original Message-----
From: Paul Graves <paul@enterprisewashington.org>
Sent: Friday, March 4, 2022 7:09 AM
To: Adam Kincaid <adam@thenrrt.org>; Maguire, Robert <robmaguire@dwt.com>; Nordlinger, David <DavidNordlinger@dwt.com>

Subject: Connect re Washington state

[EXTERNAL]

Rob, David, Adam,

Rob and David are lawyers at Davis Wright Tremaine here in Seattle, getting up to speed on the redistricting litigation. Adam runs the National Republican redistricting trust, and it's foundation, the Fair Lines America Foundation, which I believe can serve as a financing vehicle for this work. I'll let you three connect.

Paul Graves
President, Enterprise Washington
206-818-5607
Sent from my phone