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25 (designated local counsel)

26 Attorneys for Plaintiffs

27 IN THE UNITED STATES DISTRICT COURT  
28 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

29 FAITH CENTER CHURCH  
30 EVANGELISTIC MINISTRIES, a  
31 California nonprofit religious corporation,  
32 and HATTIE HOPKINS, an individual,

33 Plaintiffs,

34 v.

35 FEDERAL D. GLOVER, member and  
36 Chair of the Contra Costa County Board of  
37 Supervisors, MARK DESAULNIER,  
38 member of the Contra Costa County Board

CASE NO. \_\_\_\_\_

**VERIFIED COMPLAINT FOR  
DECLARATORY AND INJUNCTIVE  
RELIEF AND DAMAGES**

\* Applications pro hac vice submitted concurrently with this complaint.

1 of Supervisors, JOHN M. GIOIA, member  
2 of the Contra Costa County Board of  
3 Supervisors, MILLIE GREENBERG,  
4 member of the Contra Costa County Board  
5 of Supervisors, GAYLE B. UILKEMA,  
6 member of the Contra Costa County Board  
7 of Supervisors, JOHN SWEETEN, Contra  
8 Costa County Administrator, ANNE  
9 CAIN, Contra Costa County Librarian, and  
10 PATTY CHAN, Senior Branch Librarian  
11 for the Antioch branch of the Contra Costa  
County Public Library, LAURA  
O'DONAHUE, Administrative Deputy  
Director for the Antioch branch of the  
Contra Costa County Public Library, in  
their individual and official capacities,

Defendants.

12 Come now the plaintiffs, Faith Center Church Evangelistic Ministries and Hattie Mae  
13 Hopkins (collectively "Faith Center"), by and through counsel, pursuant to the Federal Rules of  
14 Civil Procedure and against the Defendants aver the following:

## 15 I.

### 16 INTRODUCTION

17 1. This case is about the Defendants' refusal to allow a religious group to use a  
18 public library meeting room for religious purposes. By written policy, Defendants have  
19 excluded the Plaintiffs solely because of their religious viewpoint and the religious content of  
20 their speech. This is a flagrant violation of the First and Fourteenth Amendments to the United  
21 States Constitution. Plaintiffs seek declaratory relief, injunctive relief, nominal damages, costs  
22 and attorneys' fees.

## 23 II.

### 24 JURISDICTION AND VENUE

25 2. This action arises under the United States Constitution, particularly the First and  
26 Fourteenth Amendments; and under federal law, particularly 28 U.S.C. §§ 2201, 2202 and 42  
27 U.S.C. §§ 1983 and 1988.  
28

1           3.      This Court has original jurisdiction over these federal claims by operation of 28  
2 U.S.C. §§ 1331 and 1343.

3           4.      This Court has authority to issue the requested declaratory relief under 28 U.S.C.  
4 § 2201.

5           5.      This Court has authority to issue the requested injunctive relief under 28 U.S.C. §  
6 1343(3).

7           6.      This Court is authorized to award the requested damages under 28 U.S.C. §  
8 1343(3).

9           7.      This Court is authorized to award attorneys’ fees under 42 U.S.C. § 1988.

10          8.      Venue is proper under 28 U.S.C. § 1391 in the Northern District of California  
11 because this claim arose there, and most of the parties reside within the District.

### 12                                 **III.**

#### 13                                 **INTRADISTRICT ASSIGNMENT**

14          9.      Pursuant to L.R. 3-2(c)-(d) & 3-5, this case is a civil rights case, in a non-  
15 excepted category, suitable for assignment to the San Francisco or Oakland divisions because the  
16 civil action arose in Contra Costa County.

### 17                                 **IV.**

#### 18                                 **IDENTIFICATION OF PLAINTIFFS**

19          10.     Plaintiff Faith Center Church Evangelistic Ministries, a.k.a. Faith Center  
20 Evangelistic Ministries, is a non-profit religious corporation in the State of California and may  
21 sue and be sued in its own name.

22          11.     Plaintiff Hattie Mae Hopkins is the leader and registered agent of Faith Center  
23 Church Evangelistic Ministries and a resident of Sacramento, California.

### 24                                 **V.**

#### 25                                 **IDENTIFICATION OF DEFENDANTS**

26          12.     Defendant Federal D. Glover is a member and the chair of the Contra Costa  
27 County Board of Supervisors, maintaining an office in Pittsburg, California. Among other  
28 things, this Defendant is responsible for establishing general policies and plans for the operation

1 of Contra Costa County government, including the county library system. This Defendant is sued  
2 in his official and individual capacities.

3 13. Defendant Mark DeSaulnier is a member of the Contra Costa County Board of  
4 Supervisors, maintaining an office in Concord, California. Among other things, this Defendant  
5 is responsible for establishing general policies and plans for the operation of Contra Costa  
6 County government, including the county library system. This Defendant is sued in his official  
7 and individual capacities.

8 14. Defendant John M. Gioia is a member of the Contra Costa County Board of  
9 Supervisors, maintaining an office in El Cerrito, California. Among other things, this Defendant  
10 is responsible for establishing general policies and plans for the operation of Contra Costa  
11 County government, including the county library system. This Defendant is sued in his official  
12 and individual capacities.

13 15. Defendant Millie Greenberg is a member of the Contra Costa County Board of  
14 Supervisors, maintaining an office in Danville, California. Among other things, this Defendant  
15 is responsible for establishing general policies and plans for the operation of Contra Costa  
16 County government, including the county library system. This Defendant is sued in her official  
17 and individual capacities.

18 16. Defendant Gayle B. Uilkema is a member of the Contra Costa County Board of  
19 Supervisors, maintaining an office in Lafayette, California. Among other things, this Defendant  
20 is responsible for establishing general policies and plans for the operation of Contra Costa  
21 County government, including the county library system. This Defendant is sued in her official  
22 and individual capacities.

23 17. Defendant John Sweeten is the Contra Costa County Administrator, maintaining  
24 an office in Martinez, California. Among other things, this Defendant is responsible for  
25 implementing Contra Costa County Board of Supervisors policies, including those governing the  
26 county library system. This Defendant is sued in his official and individual capacities.

27 18. Defendant Anne Cain is the Contra Costa County Librarian, maintaining an office  
28 in Pleasant Hill, California. Among other things, this Defendant is responsible for overseeing all

1 county libraries and enforcement of Contra Costa County policies governing the county library  
2 system. This Defendant is sued in her official and individual capacities.

3 19. Defendant Patty Chan is the Senior Branch Librarian of the Antioch Branch of the  
4 Contra Costa County Public Library system, maintaining an office in Antioch, California.  
5 Among other things, this Defendant is responsible for implementing Contra Costa Board of  
6 Supervisors policies governing the country library system, particularly the Antioch Branch. She  
7 is also responsible for overseeing the use of library facilities by outside groups and individuals  
8 like the Plaintiffs. This Defendant is sued in her official and individual capacities.

9 20. Upon information and belief, based upon telephone conferences with Ms.  
10 Hopkins, Defendant Laura O'Donahue is the Administrative Deputy Director of the Antioch  
11 Branch of the Contra Costa Public Library system, maintaining an office in Antioch California.  
12 Among other things, this Defendant is responsible for implementing Contra Costa Board of  
13 Supervisors policies governing the country library system, particularly the Antioch Branch. She  
14 is also responsible for overseeing the use of library facilities by outside groups and individuals  
15 like the plaintiffs. This Defendant is sued in her official and individual capacities.

## 16 VI.

### 17 STATEMENT OF FACTS

#### 18 **Background**

19 21. Plaintiff Faith Center Church Evangelistic Ministries (“Faith Center”) is led by  
20 Plaintiff Hattie Mae Hopkins.

21 22. Ms. Hopkins believes that, as a Christian, she is called to share her faith with  
22 others.

23 23. Ms. Hopkins believes that there are many individuals who need to hear about the  
24 gospel of Jesus Christ, but may never set foot inside a church building.

25 24. Ms. Hopkins holds organized meetings under the auspices of Faith Center, that,  
26 pursuant to the foregoing beliefs, are not held inside a traditional church building.

27 25. Faith Center currently holds meetings in Sacramento, California and Woodland,  
28 California.

1 26. Participants at Faith Center’s meetings:

- 2 a. discuss educational, cultural, and community issues from a religious  
3 perspective;  
4 b. engage in religious speech and religious worship; and  
5 c. engage in discussing the Bible and other religious books, teaching, praying,  
6 singing, sharing testimonies, sharing meals, and discussing social and political  
7 issues.

8 27. Early in 2004, after praying about it, Ms. Hopkins believed that God was leading  
9 her to begin holding Faith Center meetings in Antioch, California.

10 **Antioch Library**

11 28. The Contra Costa County Library has a branch in Antioch, California.

12 29. The Antioch Branch of the Library (“Library”) has a meeting room that is  
13 available for use by outside individuals and organizations.

14 30. This meeting room is located on the Library premises and is available during  
15 Library business hours on a first-come, first-served basis.

16 31. The Contra Costa County Board of Supervisors encourages the use of library  
17 meeting rooms for educational, cultural and community related meetings, programs, and  
18 activities.

19 32. Upon information and belief, based on written Library policies, Defendants allow  
20 a variety of nonprofit organizations to use library meeting rooms.

21 33. Non-profit and civic organizations may use the meeting rooms free of charge for  
22 meetings open to the general public.

23 34. An individual or organization seeking to reserve the meeting room need only  
24 submit to the Library a completed application that discloses the name of the individual or  
25 organization, the date and time requested, and the activity taking place.

26 35. If the room is not otherwise scheduled for the requested date and time, the  
27 application is to be approved, assuming that the requested time is within regular business hours.  
28

1 **Plaintiffs' applications**

2 36. In May 2004, Faith Center participant and Area Coordinator Mary Ward obtained  
3 an application to use the Antioch Library meeting room.

4 37. Mary Ward is a resident of Antioch, California.

5 38. Mary Ward faxed the application to Ms. Hopkins in Sacramento, California.

6 39. Ms. Hopkins filled out and signed the application, requesting the meeting room  
7 for two dates: May 29, 2004, and July 31, 2004.

8 40. Library personnel informed Ms. Hopkins that she needed to fill out a separate  
9 application for each date requested.

10 41. Ms. Hopkins complied by faxing two applications to the Library – one for May  
11 29, 2004, and the other for July 31, 2004. True and correct copies of these applications are  
12 attached as Exhibits A & B.

13 42. Ms. Hopkins then telephoned the Library in May 2004 and spoke to two separate  
14 Library employees to confirm that Faith Center's dates were on the Library calendar.

15 43. Both Library employees confirmed that the dates were on the official Library  
16 calendar.

17 44. During one of these confirmation conversations, Ms. Hopkins asked if the room  
18 was soundproof.

19 45. The Library employee said no, and expressed concern that noise from high school  
20 students in the area would bother Faith Center's meeting.

21 46. Ms. Hopkins replied that the noise would not be a bother to Faith Center's  
22 meeting.

23 47. Ms. Hopkins asked if the sound from Faith Center's meeting would be a bother to  
24 Library patrons.

25 48. The Library employee said no.

26 **May 29, 2004 Meeting**

27 49. On May 29, 2004, Ms. Hopkins, Ms. Ward, and approximately 12-15 persons  
28 intending to participate in the planned Faith Center meeting arrived at the Library.

1           50.     The meeting took place as planned and as described in Paragraphs 26.

2           51.     Out of consideration for the library’s patrons, the meeting participants did not use  
3 musical instruments or amplified sound.

4           52.     Toward the end of the meeting, Library employees “Jenna” and “Lisa” informed  
5 Ms. Hopkins and Ms. Ward that groups were not permitted to use Library meeting rooms for  
6 religious activities.

7           53.     Ms. Hopkins asked if the reason for the prohibition was because of any excessive  
8 noise resulting from the Faith Center meeting.

9           54.     The employees said that there was no noise problem with Faith Center – the  
10 problem was that Faith Center was conducting religious activities.

11          55.     The employees showed Ms. Hopkins a written policy entitled “Resolution 92/793  
12 – Contra Costa County Library – Policy for Use of Meeting Rooms in Libraries” (“policy”),  
13 which forbade religious groups to use Library facilities. A true and correct copy of that policy is  
14 attached as Exhibit C.

15          56.     The policy states that “[l]ibrary meeting rooms shall not be used for religious  
16 purposes.” *See Ex. C.*

17          57.     The employees further stated to Ms. Hopkins that they didn’t have a copy of her  
18 application.

19          58.     Ms. Hopkins promptly presented a copy of her application.

20          59.     The employees responded that the group should have never gained access and that  
21 the Library volunteer who had admitted the group was not fully familiar with Library policies.

22          60.     Ms. Ward stated that a librarian had given permission for the group to use the  
23 room after finding out the group had the room reserved.

24          61.     Ms. Hopkins expressed her concerns that such a policy might be unconstitutional.

25          62.     The Library employees informed her that her July 31, 2004 reservation would be  
26 removed from the calendar, which would prohibit Faith Center from assembling in the library  
27 meeting room on that date.



1           63. Ms. Hopkins recommended that the Library employees consult with legal counsel  
2 because Faith Center's permit for July 31, 2004, had already been granted back in May.

3           64. The employees then stated that they would keep the July 31, 2004 meeting on the  
4 calendar, but that they would need to ask a Library manager about that reservation and have the  
5 manager call Ms. Hopkins.

6           65. In early June 2004, Defendant Laura O'Donahue telephoned Ms. Hopkins.

7           66. Ms. O'Donahue stated that Faith Center needed to find another location for the  
8 July 31, 2004 meeting because she had already removed the date from the Library calendar.

9           67. Ms. O'Donahue further stated that their policy was a long-standing policy,  
10 approved by Library directors and the Contra Costa Board of Supervisors.

11           68. Ms. Hopkins recommended that Ms. O'Donahue check with legal counsel  
12 because such a policy was unconstitutional and noted that she had made the same  
13 recommendation to Jenna and Lisa.

14           69. Ms. O'Donahue reiterated that Faith Center could not use the Library meeting  
15 room.

16           70. Later in June 2004, Ms. Hopkins contacted legal counsel who prepared a letter  
17 with legal analysis and authorities for Ms. Hopkins to send to Ms. O'Donahue.

18           71. On July 5, 2004, Ms. Hopkins forwarded counsel's letter along with one of her  
19 own, asking Ms. O'Donahue to please expedite a response from Library legal counsel. A true  
20 and correct copy of Ms. Hopkins' letter is attached as Exhibit D.

21           72. Ms. Hopkins received no response from the Library to her letter.

22           73. Ms. Hopkins called Ms. O'Donahue on or about July 23, 2004, to find out if Faith  
23 Center's reservation would be reinstated on the Library calendar.

24           74. Ms. O'Donahue stated that she had asked legal counsel to take a general look at  
25 the Library facilities use policies, but that "it might take quite some time" to hear back from  
26 counsel.

27           75. Ms. O'Donahue stated that Faith Center would definitely not be allowed to use  
28 the Antioch Library meeting room for their July 31, 2004 meeting.

1           76.     Ms. Hopkins requested to speak to someone in authority, but Ms. Donahue said  
2 no one was available at that time.

3           77.     On or about July 24, 2004, Administrative Operations Officer Susan Caldwell  
4 telephoned Ms. Hopkins and admitted that they had forwarded Ms. Hopkins’ letter to their legal  
5 counsel on or about July 24, 2004.

6           78.     Ms. Caldwell added that Faith Center would definitely not be allowed to use the  
7 room for their July 31, 2004 meeting.

8           79.     Ms. Hopkins desires to reserve the meeting room for future Faith Center  
9 meetings.

10          80.     Ms. Hopkins desires to hold those meetings approximately one Saturday every  
11 other month, from 11 a.m. to 3 p.m.

12          81.     Ms. Hopkins cannot hold those meetings in the Antioch Library meeting room  
13 under the current policy.

14   **VII.**

15   **STATEMENTS OF LAW**

16          82.     Each and all of the acts alleged herein were done by Defendants under the color  
17 and pretense of state law, statutes, ordinances, regulations, customs, usages, and policies of  
18 Contra Costa County and the State of California.

19          83.     Plaintiffs’ speech, association, religious worship and religious expression are fully  
20 protected by the First Amendment to the United States Constitution.

21          84.     Granting religious groups equal access to government facilities under neutral  
22 criteria does not violate the Establishment Clause.

23          85.     Unless and until the enforcement of the Defendants’ religiously discriminatory  
24 policy is enjoined, the Plaintiffs will suffer and continue to suffer irreparable harm to their  
25 federal constitutional rights.

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**VIII.**

**FIRST CAUSE OF ACTION - VIOLATION OF THE RIGHT TO FREEDOM OF  
SPEECH UNDER THE UNITED STATES CONSTITUTION**

86. The allegations contained in all preceding paragraphs are incorporated herein by reference.

87. Religious speech and worship are protected by the First and Fourteenth Amendments to the United States Constitution.

88. The Defendants created a designated public forum by allowing individuals and organizations to reserve the Library facilities for a wide variety of free speech activities.

89. Within a designated public forum, express discrimination against religious speech is presumptively unconstitutional.

90. Within a designated public forum, the government may not discriminate on the basis of the content of the speaker's speech absent a compelling governmental interest.

91. Regardless of the type of forum (traditional, designated or limited, or nonpublic fora), the government may not discriminate based upon the viewpoint expressed by the speaker.

92. The Defendants discriminated against Plaintiffs because of the religious speech and religious viewpoint that would be expressed at Plaintiffs' meetings.

93. The Defendants have no compelling government interest to justify their discriminatory treatment of the Plaintiffs.

94. The Defendants' actions therefore violate the Free Speech Clause of the First Amendment to the United States Constitution as incorporated and applied to the states under the Fourteenth Amendment.

WHEREFORE, Plaintiffs respectfully pray that the Court grant the relief set forth hereinafter in the prayer for relief.

1 **IX.**

2 **SECOND CAUSE OF ACTION - VIOLATION OF THE RIGHT TO FREE EXERCISE**  
3 **OF RELIGION UNDER THE UNITED STATES CONSTITUTION**

4 95. The allegations contained in all preceding paragraphs are incorporated herein by  
5 reference.

6 96. The Plaintiffs' desire to meet for worship and fellowship with others outside of a  
7 traditional church building is motivated by their sincerely held religious beliefs.

8 97. Plaintiffs sought to, and continue to seek to, discuss educational, cultural, and  
9 community issues from a religious perspective.

10 98. The Defendants' policy expressly excludes "religious purposes" from the Library  
11 meeting rooms.

12 99. The Defendants' policy expressly bars access to public facilities based upon the  
13 religious or non-religious nature of the applicant and the applicant's speech.

14 100. Defendants' policy substantially burdens Plaintiffs' sincerely-held religious  
15 beliefs.

16 101. The Defendants have no compelling reason that would justify discrimination  
17 based upon the Plaintiffs' religious expression and nature.

18 102. The Defendants' policy therefore violates the Free Exercise Clause of the First  
19 Amendment to the United States Constitution as incorporated and applied to the states under the  
20 Fourteenth Amendment.

21 WHEREFORE, Plaintiffs respectfully pray that the Court grant the relief set forth  
22 hereinafter in the prayer for relief.

23 **X.**

24 **THIRD CAUSE OF ACTION - VIOLATION OF THE ESTABLISHMENT CLAUSE**  
25 **UNDER THE UNITED STATES CONSTITUTION**

26 103. The allegations contained in all preceding paragraphs are incorporated herein by  
27 reference.

1 104. The Defendants’ policy expressly prohibits “religious purposes” for exclusion  
2 from Library facilities.

3 105. The Defendants’ policy requires that government officials scrutinize private  
4 speech and determine whether private speech or a private purpose is “religious,” thus  
5 impermissibly entangling government with religion.

6 106. The Defendants’ policy demonstrates impermissible hostility towards religion.

7 107. Defendants have no compelling interest that would justify their hostility towards  
8 religion.

9 108. The Defendants’ policy therefore violates the Establishment Clause of the First  
10 Amendment to the United States Constitution as incorporated and applied to the states under the  
11 Fourteenth Amendment.

12 WHEREFORE, Plaintiffs respectfully pray that the Court grant the relief set forth  
13 hereinafter in the prayer for relief.

14 **XI.**

15 **FOURTH CAUSE OF ACTION - VIOLATION OF THE EQUAL PROTECTION**  
16 **CLAUSE UNDER THE UNITED STATES CONSTITUTION**

17 109. The allegations contained in all preceding paragraphs are incorporated herein by  
18 reference.

19 110. The Equal Protection Clause requires that the government treat similarly-situated  
20 persons equally.

21 111. The Defendants allowed similarly-situated organizations to use the Library  
22 facilities and engage in a wide variety of speech and expression in the reserved facilities.

23 112. Based on their policy excluding “religious purposes,” Defendants have refused to  
24 allow Plaintiffs the same access to Library facilities.

25 113. Defendants have no compelling interest to justify their exclusion of the Plaintiffs.

26 114. The Defendants’ policy therefore violates the Equal Protection Clause of the  
27 Fourteenth Amendment to the United States Constitution.

1           WHEREFORE, Plaintiffs respectfully pray that the Court grant the relief set forth  
2 hereinafter in the prayer for relief.

3   **PRAYER FOR RELIEF**

4 WHEREFORE, Plaintiffs request the following relief:

5           A. That this Court preserve the relative position of the parties by preliminarily enjoining  
6 the Defendants from ceasing their practice of allowing use of the Library meeting rooms by  
7 nonprofit organizations;

8           B. That this Court preliminarily and permanently enjoin the Defendants from enforcing  
9 their policy that expressly discriminates on the basis of religion;

10           C. That this Court enter declaratory judgment stating that the Defendants' policy is  
11 facially unconstitutional and violates the Plaintiffs' rights as guaranteed under the First and  
12 Fourteenth Amendments to the United States Constitution;

13           D. If the policy is not declared facially unconstitutional, that this Court enter a  
14 declaratory judgment stating that the policy is unconstitutional as applied to the Plaintiffs and  
15 violates the Plaintiffs' rights guaranteed under the First and Fourteenth Amendments to the  
16 United States Constitution;

17           E. That this Court award Plaintiffs nominal damages arising from the acts of the  
18 Defendants as an important vindication of the constitutional rights at stake;

19           F. That this Court award Plaintiffs their costs and expenses of this action, including  
20 reasonable attorneys' fees, in accordance with 42 U.S.C. § 1988 and other applicable law;

21           G. That this Court grant such other and further relief as the Court deems equitable, just,  
22 and proper;

23           H. That this Court adjudge, decree and declare the rights and other legal relations of the  
24 parties to the subject matter here in controversy, in order that such declarations shall have the  
25 force and effect of final judgment; and

26           I. That this Court retain jurisdiction of this matter as necessary to enforce the Court's  
27 orders.

28           ///

1 Respectfully submitted on this, the 30th day of July, 2004,

2 Attorneys for Plaintiffs,

3 By: \_\_\_\_\_

4 Terry L. Thompson

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7  
8 **FRCP 7.1 CORPORATE DISCLOSURE STATEMENT**

9 This Corporate Disclosure Statement is filed on behalf of Faith Center Church  
10 Evangelistic Ministries in compliance with Federal Rule of Civil Procedure 7.1.

11 Faith Center Church Evangelistic Ministries is a California non-profit religious  
12 corporation; it has no parent corporation and has not issued, nor will it issue, publicly held stock.  
13 Thus, no other corporation holds any stock in Faith Center Church Evangelistic Ministries.

14 A supplemental disclosure statement will be filed upon any change in the information  
15 provided herein.

16 Respectfully submitted on this, the 30th day of July, 2004.

17  
18 By: \_\_\_\_\_

19 Terry L. Thompson