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5
6 IN THE DISTRICT COURT OF THE STATE OF WASHINGTON
7 FOR KING COUNTY

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10)
11 IN RE INQUEST INTO THE DEATH OF) No. 517IQ8013
12 DAMARIUS D. BUTTS)
13)
14)

15) SEATTLE POLICE DEPARTMENT'S
16) BRIEF REGARDING SCOPE OF
17) DISCOVERY AND ENTRY OF
18) PROTECTIVE ORDER
19)
20)
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25 The Seattle City Attorney's Office, on behalf of the Seattle Police Department ("SPD"),
26 hereby submits this Briefing on the Scope of Discovery and a Request for Entry of a Protective Order.

27 In support thereof, SPD states the following:

28 **STATEMENT OF ISSUE**

- 29 (1) Whether the scope of discovery should exclude discovery into the conduct of non-shooting
30 officers?
31
32 (2) Whether the non-shooting officers are entitled to have representation through counsel during
33 discovery?
34
35 (3) Whether the Family's discovery request is overbroad and seeks irrelevant information outside

1 the scope?

- 2 (4) Whether confidential records related to personal identifying information, SPD tactical
3 information, and third parties' information should be excluded as nonmaterial and
4 unnecessary for transparency and public consumption during the inquest at issue?

5 **BRIEF ANSWER**

- 6 (1) Yes. The purpose of the inquest under 26.24.020 allows for an inquest into the death of an
7 individual to evaluate whether "[t]he death . . . was unnatural, or violent, or resulted from
8 unlawful means, or from suspicious circumstances, or was of such a nature as to indicate
9 the possibility of death by the hand of the deceased or through the instrumentality of some
10 other person."

- 11 (2) Yes. As the Family's discovery seeks information directly related to the conduct of the non-
12 shooting officers, counsel protection should be afforded.

- 13 (3) Yes. The Family's discovery request seeks information of prior conduct not serving any
14 relevant or informative purpose for discovery in this inquest.

- 15 (4) Yes. Confidential matter pertaining to personal identifying information, medical information,
16 tactical information, and third parties' information are not material or necessary for
17 transparency and should not be readily available for public consumption. This Court should
18 grant SPD's motion for entry of a protective order over these confidential records.

19 **STATEMENT OF FACTS**

20 The Force Investigation Report, identified as Bates No. 0496, identifies the following:
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23

Involved Officer(s):

Rank	Name	Serial	Call Sign	DICV	Statement	Role
Officer	Bandel, Chris	8367	2K33	Yes	Audio	Type I
Officer	Briskey, Jacob	6824	K99	Yes	Written	Type II (Dog Bite)
Officer	Clark, Matthew	8310	2D1	Yes	Audio	Type I
Officer	Gordillo, Canek	7651	2M95	N/A	Audio	OIS
Officer	Kang, Hudson	7759	2M02	Yes	Audio	Type I
Officer	Kennedy, Elizabeth	7725	2M2	Yes	Audio	OIS
Officer	Merritt, Adam	7673	2M95	Yes	Audio	Type II
Officer	Myers, Christopher	5452	2D1	Yes	Audio	OIS
Officer	Vaaga, Joseph	8397	K22	Yes	Audio	OIS

Title 8 of the SPD manual (produced in discovery) identifies the different types of use of force classified by the Seattle Police Department. In that document, the following classifications are detailed:

Type I – Force that causes transitory pain, the complaint of transitory pain, disorientation, or intentionally pointing a firearm or bean bag shotgun at a person.

Type II – Force that causes or is reasonably expected to cause physical injury greater than transitory pain but less than great or substantial bodily harm, and/or the use of any of the following weapons or instruments: CEW, OC spray, impact weapon, bean bag shotgun, deployment of K-9 with injury or complaint of injury causing less than Type III injury, vehicle, hobble restraint.

Type III – Force that causes or is reasonably expected to cause, great bodily harm, substantial bodily harm, loss of consciousness, or death, and/or the use of neck and carotid holds, stop sticks for motorcycles, impact weapon strikes to the head.

(SPD Manual effective in April 2017, 8.050). Here, four officers are identified as those involved in the officer involved shooting that is the subject of this inquest (Kennedy, Myers, Vaaga, and Gordillo – all represented by counsel Buck and Bariault).

The other officers' actions are as follows: Officer Kang pointed his weapon and was subsequently shot by the decedent and removed from the scene with serious injuries. He did not discharge his firearm. (*See* 1629-33) Officer Bandel pointed his firearm (*See* 1647-50). He did not

1 discharge his firearm. (*Id.*). Officer Clark was partnered with Officer Myers. He pointed his firearm
2 and later served in a different capacity outside of the scene involving decedent Butts. He did not
3 discharge his weapon. (*See* 198-99). Officer Merritt initially attempted to detain decedent Butts by
4 drawing his weapon, his attention was then focused for the remainder of the incident in engaging
5 with Ms. Adriana Butts, in a different location and place from that of decedent's location at the
6 time of death. (*See e.g.* 1587-1596). Officer Briskey was a canine officer that responded to the
7 scene after gunfire exchange between the decedent and the four shooting officers. Officer Briskey
8 and the canine officer Blitz were there to assist in bringing the decedent from an obstructed place
9 to get a clear visual of decedent Butts. (*See* 1581-86).

10 Currently, there are four officers (Gordillo, Kennedy, Myers, Vaaga) represented during
11 discovery and for the inquest itself. The training, compliance with policy, and personal histories of
12 five officers (Bandel, Briskey, Clark, Kang, Merritt) are also the subject of discovery demands by the
13 Family. These officers do not have representation. The Administrator has not yet defined the scope
14 of what officers will be provided the option of "participation" at the inquest or whether the jury will
15 be opining on their actions.

16 On June 14, 2019, the first pre-conference hearing on the Damarius Butts inquest occurred.
17 Administrator Michael Spearman set a scheduling order for briefing of the parties on two matters: (1)
18 the scope of discovery; and (2) entry of a protective order. SPD was unable to reach a compromise
19 with the attorneys for Mr. Butts' family on the entry of a protective order. (*See* Evans Dec., Ex. A).
20 This brief follows.

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1 **EVIDENCE RELIED UPON**

- 2 (1) Declaration of Ghazal Sharifi and corresponding exhibits;
- 3 (2) Declaration of Erika Evans and corresponding exhibits;
- 4 (3) The record contained herein.

5 **ARGUMENT**

6 SPD appreciates the Family counsel's efforts to streamline discovery in this matter. SPD is
7 committed to transparency and a full and fair hearing for all parties involved. But SPD expects that
8 this inquest does not become complicated by lines of immaterial inquiry obfuscating the inquest's
9 intended purpose. SPD has concerns about the scope and relevance of some of the discovery materials
10 sought by the Family's counsel as it is beyond the scope of the inquiry points in this inquest.
11 Additionally, SPD proposes a protective order for the Administrator's review and signature as the
12 discovery already produced in this case by the Executive and anticipated to be produced contains
13 personal identifying information, medical, and tactical information not subject to public disclosure.

14 **I. The scope of discovery should not include discovery into the specific conduct of non-**
15 **shooting officers.**

16 There were four officers that exchanged gunfire with the decedent Butts. Those four officers
17 are involved in this inquest through their represented counsel, Mr. Buck and Mr. Bariault. The
18 Family's discovery seeks information about five other non-shooting officers – Bandel, Briskey, Clark,
19 Kang, and Merritt. (Pl.'s Discovery Request Nos. 1-3, 8-13, attached hereto as Sharifi Dec. Exhibit
20 A).

21 As discussed in the preceding sections, Officers Bandel, Clark, Kang, and Merritt only
22 pointed their weapons and were not engaged in any gunfire or fatal force with the decedent Butts.
23 Officer Briskey was a canine officer that participated at the scene only after gunfire exchange

1 between the decedent and the four shooting officers. Officer Briskey and the canine officer Blitz's
2 roles were to assist bringing the decedent from an obstructed place to get a clear visual of decedent
3 Butts. (*See* 1581-86).

4 The non-shooting officers are witnesses, just like many other officers that responded to the
5 scene and civilians who were present. The purpose of the Inquest as outlined in the Executive
6 Order is as follows:

7 2.1. To establish policies and procedures for conducting reviews into the facts and
8 circumstances of any death of an individual involving a member of any law enforcement agency
9 within King County while in the performance of the member's duties [and/or the exercise of
10 member's authority], and occasionally in other cases, as determined by the County Executive.

11 2.2. The purpose of the inquest is to ensure a full, fair, and transparent review of any such
12 death, and to issue findings of fact regarding the facts and circumstances surrounding the
13 death. The review will result in the issuance of findings regarding the cause and manner of
14 death, and whether the law enforcement member acted pursuant to policy and training.

15 2.3. The purpose of the inquest is not to determine whether the law enforcement member
16 acted in good faith or should be disciplined or otherwise held accountable, or to otherwise find
17 fault, or to determine if the use of force was justified, or to determine civil or criminal liability.
18 It is acknowledged that the facts determined in the course of the inquest may sometimes have
19 an indirect bearing on such determinations.

20 The purpose – in short- is to investigate the facts and circumstances of *the death* –to result
21 in a review to evaluate “the cause and manner of the death” and whether the law enforcement
22 officer “acted pursuant to policy and training.” The personal disciplinary histories, prior uses of
23 force,¹ the training records, or policies related to the actions and conduct of the *non*-shooting
officers are not “material” or “reasonably calculated to lead to the discovery of admissible
evidence” at the ultimate conclusion of this inquest. (*See* CrR 4.7; CR 26). For example, the Family
seeks “firearm certification” and “firearm and Taser” information for *all* officers – both shooting
and non-shooting. (Sharifi Dec., Ex. A, q. 2-3). There is no relevance to the discovery of firearm

¹ These requests are the subject of SPD's objection in another portion of this brief.

1 information as to the non-shooting officers. Likewise, Tasers are not at issue in this case.
2 Additionally, the family seeks discovery of specific training records for each of the nine officers
3 identified above. Again, these requests may be relevant as to the shooting officers and the ultimate
4 issues that the inquest jury will visit at the conclusion of the inquest hearing. However, the same
5 principle does not apply to the non-shooting officers. Those officers' presence at the scene or some
6 action taken by those officers does not automatically render the training and histories of *those*
7 officers material to resolve the ultimate issue for the fact-finder. The training, compliance with
8 policy, and personal histories of those officers are beyond the inquiry of the cause and manner of
9 death – rather the fact of their involvement and their observations are the same as the other facts
10 present in the case.

11 **II. If the Administrator extends discovery into the individual acts of non-shooting officers,**
12 **those officers should be permitted to have counsel representation during the discovery**
phase.

13 The scope of the inquest has not yet been defined. The non-shooting officers are not
14 currently represented by counsel. The discovery directed to SPD includes discovery that would
15 lead directly to inquiries about whether the non-shooting officers complied with SPD policy and
16 their training. If the Administrator rejects the preceding argument by SPD and identifies that some
17 or all the training or personal histories of the non-shooting officers are at issue, then the non-
18 shooting officers should have the option to have counsel representation during the discovery phase
19 of this inquest. This is particularly applicable if there are anticipated interviews, statements, or
20 future testimony opining on the non-shooting officers' compliance with training and policy. The
21 at-issue discovery inquiries may lead to the officers being the subject of disciplinary review,
22 criminal, and civil liability without the benefit of having counsel protection. Even the Executive
23 Order acknowledges this outcome: "It is acknowledged that the facts determined in the course of

1 the inquest may have an indirect bearing on” disciplinary, criminal, or civil determinations. Order
2 at 2.3. The Office of Police Accountability has broad jurisdiction to review policy violations – and
3 information garnered during the inquest process does not fall outside of that jurisdiction. Likewise,
4 documents, interviews, testimony, and other inquiries into the non-shooting officers’ action may
5 expose them to criminal consideration and civil liability down the line.² Under the Order, officers
6 that are the subject of the inquiry by the inquest jury are afforded greater protections, including
7 the right to decline to “participate.” If non-shooting officers are not currently the subject of the
8 inquest fact-finding inquiry and participate to the extent they are required to in discovery, then
9 such officers essentially waive their right to not “participate” if the Administrator later finds that
10 the non-shooting officers are within the scope of the inquest. Absent clarity on the scope of the
11 inquest early in the case, the Administrator should afford the non-shooting officers the opportunity
12 to seek representation by counsel during the discovery period.

13 **III. The Family’s discovery requests are, in part, overbroad and seek irrelevant information**
14 **outside the scope of this Inquest inquiry and in violation of the principles of ER 404(b).**

15 *A. OPA and Use of Force Records.*

16 The Family’s discovery Request No. 10 seeks discovery of all Office of Police Accountability
17 (“OPA”) files of all nine officers for all time. Request No. 11 seeks any and all prior use of force
18 reports (with guns/Tasers) from all nine officers for all time. These requests seek information that is
19 pure propensity evidence without any causal connection to the underlying event itself. Additionally,
20 these requests are very burdensome, yielding voluminous and purely irrelevant information that
21 should not lead to the discovery of any admissible evidence for the purpose of the inquest itself. In

22 ² Seattle Municipal Code 4.64.010 affords City employees the opportunity to request a defense and indemnification
23 where there are “[a]ny claims and/or litigation arising from any conduct, acts or omissions of such officers or employees
in the scope and course of their City employment.”

1 the Executive Order, there is a caution against the use or attempted use of such evidence. The Order
2 states:

3 4.6. The disciplinary history of the law enforcement member(s) involved may not be introduced
4 into evidence unless the administrator first determines that it is directly related to the use of
5 force. If such information is admitted, it must be limited to the greatest extent possible.

6 Order at 4.6. There is nothing in the discovery that has been produced to date to show *any* causal
7 connection of the officers' prior discipline to the use of force on the decedent. There is nothing in
8 the discovery that has been produced to date to show *any* causal connection of the officers' prior
9 uses of force to the force used on the date of incident. The discovery request is nothing more than
10 a request for propensity evidence – which is disfavored and inapplicable to the circumstances of
11 the case at hand.³

12 404(b) states, “[e]vidence of other crimes, wrongs, or acts is not admissible to prove the
13 character of a person in order to show action in conformity therewith. It may, however, be
14 admissible for other purposes, such as proof of motive, opportunity, intent, preparation, plan,
15 knowledge, identity, or absence of mistake or accident.” ER 404(b). None of these exceptions
16 apply to the facts and circumstances at hand – rendering any need for discovery of the requested
17 materials.

18 In civil rights litigation, prior acts of alleged misconduct or force have been excluded by
19 courts under 404(b) and 403. *See Valerie Allen v. City of Los Angeles et al.*, 2012 WL 1641712*4
20 (citing *Gates v. Rivera*, 993 F.2d 697, 700 (9th Cir.1993) (excluding evidence of prior acts of
21 police officer in civil rights case)); *see also Berkovich v. Hicks*, 922 F.2d 1018 (2d Cir. 1991)

22
23 ³ It should be noted that if the Family's counsel wants to evaluate dishonesty or bias issues, they served a separate
discovery request seeking *Brady* information. SPD plans to answer this request identifying whether any of the officers
are on the *Brady* list for dishonesty or bias. They are not.

1 (upholding the exclusion at trial of all references to the defendant police officers' history of prior
2 civilian complaints pursuant to 403 and 404(b) of the Federal Rules of Evidence); *Maddox v. City*
3 *of Los Angeles*, 792 F.2d 1408, 1417 (9th Cir.1986)).

4 The Supreme Court of Washington identifies in criminal cases that when defense counsel fails
5 to substantiate the materiality of documents sought, a trial court abuses its discretion in awarding
6 discovery. *See State v. Blackwell*, 120 Wn.2d 822, 845 P.2d 1017 (1993) (*en banc*). In *Blackwell*, the
7 defense sought via subpoena service records and personnel files of police officers, arguing that those
8 documents were material because they “*could* lead to exculpatory evidence of improper police
9 conduct and/or arrests based on race and excessive force that might rebut the officers' claim of proper
10 police conduct.” 120 Wn.2d at 829 (emphasis in original). The *Blackwell* Court explicitly rejected
11 such a rationale as the basis for compelling production and found that a “broad, unsupported claim”
12 that such documents “*may* lead to material information does not justify automatic disclosure of the
13 documents.” *Id.* (emphasis in original). The Supreme Court of Washington in *Blackwell* further found
14 that “[a] defendant must advance some factual predicate which makes it reasonably likely the
15 requested file will bear information material to his or her defense. A bare assertion that a document
16 ‘might’ bear such fruit is insufficient.” *Id.* at 830. As the defense made no such factual showing, the
17 *Blackwell* Court found that compelling disclosure of the documents was inappropriate. *Id.*

18 There is no reason to elicit thousands of pages of records of additional discovery for
19 propensity evidence that is inapplicable to the issue at hand. This Court should prohibit this inquiry
20 because a showing has not been made and no evidence has suggested that the limited exceptions
21 identified in Section 4.6 of the Order apply.

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1 *B. New Officer Training.*

2 The Family's discovery Request No. 6 requests, "SPD new officer handbook and/or new hire
3 training requirements (with underlying documents)." This request is irrelevant to the scope of
4 inquiry – even in discovery. SPD's "new hire training requirements" in 2017 or even today applies
5 to "new hires." Additionally, "new hire training requirements" have nothing do to with the scope
6 of inquiry at issue in this inquest – the manner and cause of death and whether the involved officers
7 were acting within policy/training. The Officers at issue have varying degrees of experience from
8 a handful of years to 25+. It is unclear as to what the relevance of this inquiry is and how it is to
9 be interpreted by SPD as a discovery request.

10 **IV. Confidential records related to personal identifying information, SPD tactical**
11 **information, and third parties' private information is not material and necessary for**
12 **transparency and public consumption during this inquest and therefore a protective**
13 **order is appropriate.**

14 SPD has grounds to seek a protective order pursuant to King County Executive Order
15 Discovery and Admissibility of Evidence rule 4.7. Rule 4.7 states "protective orders may be used to
16 limit discovery, and the administrator may order the return of all discretionarily ordered
17 discovery." In addition, under Wash. Super. Ct. Civ. R. 26 (CR 26) the court may issue a protective
18 order upon a motion by the party from whom discovery is sought upon a showing of good cause.
19 The court exercises broad discretion to manage the discovery process in a manner that will
20 implement the goal of full disclosure of relevant information and at the same time afford the
21 participants' protection against harmful side effects. *Ollie v. Highland Sch. Dist. No. 203*, 50
22 Wash. App. 639, 642–43, 749 P.2d 757, 759–60 (1988) (citation omitted). Further General Court
23 Rule 31(e) requires omission or redaction of personal identifiers to protect the personal identifying
information of third-parties. General Court Rule 31(e) states:

1 “(1) Except as otherwise provided in GR 22, parties shall
2 not include, and if present shall redact, the following
3 personal identifiers from all documents filed with the
court, whether filed electronically or in paper, unless
necessary or otherwise ordered by the Court.

4 (A) Social Security Numbers. If the Social Security
5 Number of an individual must be included in a
document, only the last four digits of that number
shall be used.

6 (B) Financial Account Numbers. If financial account
7 numbers are relevant, only the last four digits
shall be recited in the document.

8 (C) Driver's License Numbers.”

9 General Court Rule 31(e).

10 Here, the discovery sought by (and produced to) the Family’s counsel contains personal
11 identifying information, SPD tactical information, and third parties’ personal information.
12 Specifically, some of this confidential material includes medical, psychological, and financial
13 records; non-public tactical policies, procedures, and training protocols; records that could
14 implicate the privacy rights of the parties or third parties, including, but not limited to, personal
15 identifying information (“PII”) such as date(s) of birth, social security number(s), personal home
16 address(es), phone number(s), and e-mail address(es), driver’s license or state identification
17 number(s), personal financial information, passport information, criminal history and/or criminal
18 record number(s), and other unspecified PII. Here, the Family’s counsel wants this information
19 readily available to the public. Counsel makes this clear in their communications,
20

21 “Critical to this transparent review is the public’s ability to have access to all court
22 hearings and related pleadings and documents used throughout the inquest. The
23 proposed protective order, in particular the requirement that discovery not be filed
in the case, runs contrary to the main policy goal of having open, transparent
proceedings.”

1 Exhibit A. While SPD fully respects transparency, the proposed protective order merely
2 prevents public dissemination of confidential matter and the return of the discovery at the close of the
3 inquest. This is reasonable given that the inquest does not allow for appeals or any review processes.
4 Thus, there is no need for counsel to retain these confidential records.

5 The King County Executive Order states:

6 “in the event that confidential materials in the possession of any person or agency
7 are sought for use in the inquest, the administration, upon a prima facie showing of
8 necessity, relevancy, and lack of an alternative source for the materials, shall
9 examine the materials in camera. These materials may include, and the
10 administrator shall have the discretion to consider the admissibility and use of,
information that may be relevant to the incident. The legal representative of the
person or agency in possession of the materials shall have the right to participate in
the review of these materials.”

11 King County Executive Order Discovery and Admissibility of Evidence rule 4.3.

12 Consistent with 4.3, there is room for the attorneys for the Family to challenge confidential
13 material they deem relevant and necessary during the course of the inquest. Upon a showing of
14 necessity, relevancy, and a lack of an alternative source, the administrator may look at the confidential
15 records in camera. King County Executive Order Discovery and Admissibility of Evidence rule 4.3
16 parallels with protective orders in criminal cases.

17 SPD does not seek to preclude production of these confidential records. Instead, SPD requests
18 that these records be disclosed under a protective order. This will allow the production of confidential,
19 proprietary, or private information to not be distributed for public consumption. In the event that public
20 disclosure is expected to be made, then appropriate redaction of confidential matter can be done and
21 the document can be produced. The Family’s counsel fails to make any factual showing as to why
22 the confidential matter they seek to have open to the public would be relevant and material to the
23 representation of Mr. Butt’s family in the inquest proceeding. Under Washington Supreme Court

precedent, conjecture alone without any further factual showing is simply insufficient. *See Blackwell*, 120 Wn.2d at 830.

The purpose of the inquest hearing is to have a full, fair, and transparent review of the death, and to issue findings of the facts and circumstances surrounding the death and whether officers acted pursuant to policy and training. As indicated above, the documents sought by (and produced to) the Family's counsel contain personal identifying information, which has no bearing in the purpose of the inquest at issue.

Personal identifying information, medical information, and tactical information has no bearing on the transparent purpose behind this inquest. Notably, the scope of the Protective Order proposed by SPD does not call for the records produced in discovery to automatically be sealed by the Court. The Order details procedures for the parties to meet and confer on documents designated as confidential. Further, that prior to public disclosure or public filing of documents deemed "confidential," that a party may request the removal of a confidentiality designation or redact the contents of the document that are designated "confidential," thus removing the confidentiality of the document itself. The Court must weigh a party's privacy or safety concerns against the public interest. General Rule 15(c)(2). "A court record shall not be sealed under this section when redaction will adequately resolve" issues of confidentiality. General Rule 15(c)(3). In addition, SPD's proposed protective order does not otherwise restrict the public's ability to access publicly available documents through normal means under R.C.W. 42.56 *et seq.*

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1 **CONCLUSION**

2 SPD respectfully requests that this Court prohibit and limit discovery as detailed above.
3 SPD further requests that the Administrator enter the proposed Protective Order, attached as Evans
4 Dec., Ex. A.

5 DATED this 1st day of July, 2018.

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CERTIFICATE OF SERVICE

This certifies that a true and correct copy of the attached **SEATTLE POLICE DEPARTMENT'S BRIEF REGARDING SCOPE OF DISCOVERY AND ENTRY OF PROTECTIVE ORDER** was caused to be served on counsel of record in the manner indicated below:

Matthew Anderson Matt.Anderson@kingcounty.gov	<input checked="" type="checkbox"/> By E-mail
Adrien Leavitt Adrian.Leavitt@kingcounty.gov	<input checked="" type="checkbox"/> By E-mail
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DATED this 1st day of July, 2019.

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