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No. 103339-7

IN THE SUPREME COURT OF THE
STATE OF WASHINGTON

STEVE HORVATH,

Petitioner,

v.

DBIA SERVICES d.b.a. METROPOLITAN
IMPROVEMENT DISTRICT,

Respondent.

MOTION FOR RECONSIDERATION AND CLARIFICATION OF THE COURT'S OPINION

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I. IDENTITY OF MOVING PARTY

This motion for reconsideration and clarification is submitted by Respondent DBIA Services (DBIA).

II. STATEMENT OF RELIEF SOUGHT

DBIA respectfully requests that this Court reconsider and clarify its December 18, 2025 Opinion in this case. In particular, the majority's analysis of the first *Telford* factor concludes that private entities providing "at least some services" that "support the peace, safety, health, and general welfare" of the public are performing "core" governmental functions. Slip. Op. at 15. If entities tasked with performing an activity that supports the goals served by the municipal police power are now performing a "core" governmental function under *Telford*, the Public Records Act will cover most nonprofits and other private entities that contract with state or local government. This significant expansion of the *Telford* test deviates from the prior rulings of this Court and the Court of Appeals. The Opinion further expands the scope of *Telford* by stating for the first time that the

four factors applied by Washington courts for 25 years are not exclusive, and applying a fifth factor.

Even if this Court is unwilling to change its ultimate determination of DBIA's status as the functional equivalent of a public agency, it should modify its Opinion to clarify the scope of the first *Telford* factor and to specify which functions performed by DBIA are deemed "core" governmental functions. Without clarification, the Court's Opinion leaves DBIA, other parking and business improvement area administrators, public agencies, and numerous private-entity government contractors, with conflicting and unclear precedent on the scope of activities that may render a private entity "a local agency" subject to the Public Records Act.

III. FACTS RELEVANT TO THIS MOTION

Because the Court is familiar with the background of this case from the prior briefing, and to avoid unnecessary repetition, DBIA incorporates its discussion of the facts relevant to this motion into its argument below.

IV. ARGUMENT

A. <u>The Court's Opinion Expands the Scope of the First *Telford* Factor Substantially Beyond the "Core" Government Functions Described in Prior Decisions of this Court and the Court of Appeals</u>.

Prior to this Opinion, Washington courts consistently "describe[d] the first *Telford* factor as looking for 'core' government functions or functions that could not be delegated to the private sector." *Fortgang v. Woodland Park Zoo*, 187 Wn.2d 509, 524–25, 387 P.3d 690 (2017) (citing *Clarke v. Tri-Cities Animal Care & Control Shelter*, 144 Wn. App. 185, 194, 181 P.3d 881 (2008); *Telford v. Thurston Cnty. Bd. of Cmm'rs*, 95 Wn. App. 149, 165, 974 P.2d 886 (1999)). As this Court observed in *Fortgang*:

> Like *Telford* and *Clarke*, out-of-state cases addressing enabling legislation tend to ask whether that legislation defines the "function" at issue as ***an inherently public one, which cannot be delegated to the private sector***, and/or whether the enabling legislation actually ***obligates the entity at issue to perform that function***. And, like *Telford* and *Clarke*, most out-of-state cases ***look to the nature of the disputed entity's activities*** when determining

> whether it is performing an ***inherently "governmental function."*** This makes sense, given that the purpose of the *Telford* test is to identify private entities that have ***effectively assumed the role of government***—not to erode the privacy of any entity that contracts with government to further the public interest.

Id. at 525–26 (emphasis added) (footnotes omitted).

The Opinion here departs from this settled interpretation and broadens the scope of the first *Telford* factor to cover any activity supporting a municipality's general police power: "[A]t least some of the services DBIA provides, such as public safety and sanitation, ***support*** the peace, security, health, and general welfare of the city ***and thus are core governmental functions***." Slip. Op. at 15 (emphasis added).[1] As a result, private entities

[1] *See also* Slip Op. at 13 ("Generally, the police power concerns the 'peace, security, health, morals, and general welfare of a community.'" (quoting *State v. Mountain Timber Co.*, 75 Wash. 581, 586, 135 P. 645 (1913), *aff'd*, 243 U.S. 219, 37 S. Ct. 260, 61 L. Ed. 685 (1917))). The *Mountain Timber* case addresses the state legislature's regulatory authority to enact laws to protect the health and safety of the public, but does not touch on whether those areas subject to regulation are themselves "core" functions that are "inherently governmental" in nature.

that perform activities that merely "support" a function within the broad ambit of the municipal police power are now engaging in "core" government functions.

Equating the police power with "core" government functions under *Telford* is a far broader reading than appears in any of the prior decisions of our courts. Absent clarification, the Opinion sweeps numerous private entities that contract with government for the public's benefit into the scope of the Public Records Act—a result that directly conflicts with this Court's prior descriptions of *Telford*'s purpose:

> The *Telford* test is designed to prevent the government from operating in secrecy via a private surrogate. It is not designed to sweep within PRA coverage every private organization that contracts with government.

Fortgang, 187 Wn.2d at 532; *id.* at 526 (*Telford* was not designed to "erode the privacy of any entity that contracts with government to further the public interest"); *see also id.* at 533 (concluding that "because operating a zoo is not a nondelegable,

'core' government function, [the] case [did] not involve the privatization of fundamentally public services").

1. The Court Should Clarify Its Discussion of Municipal Police Powers.

The City of Seattle's broad police power to enact legislation to protect public health, safety, and welfare is derived from Article XI, Section 11 of our state constitution: "Any county, city, town or township may make and enforce within its limits all such local police, sanitary and other regulations as are not in conflict with general laws." The term "police" in the context of the municipal "police power" is "derived from the Greek word 'polis,' meaning 'city.' Originally all power in the exertion of governmental activity, both foreign and domestic, was termed the police power." 6A MCQUILLIN, THE LAW OF MUNICIPAL CORPORATIONS § 24:2 (3d ed. 2025) (noting the police power encompasses the "greater part of present municipal governmental activity").

The scope of a municipality's police power is "broad, encompassing all those measures which bear a reasonable and substantial relation to promotion of the general welfare of the people." *Cannabis Action Coal. v. City of Kent*, 180 Wn. App. 455, 482, 322 P.3d 1246 (2014) (quoting *State v. City of Seattle*, 94 Wn.2d 162, 165, 615 P.2d 461 (1980)), *aff'd*, 183 Wn.2d 219, 351 P.3d 151 (2015).[2] The municipal police power encompasses the authority to promulgate general health and safety regulations on subjects ranging from solid waste management to zoning. *Ventenbergs*, 163 Wn.2d at 101; Spitzer, *supra* n.3, at 512 (explaining zoning regulations upheld as an exercise of the police

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[2] *See also Ventenbergs v. City of Seattle*, 163 Wn.2d 92, 101, 178 P.3d 960 (2008); 6A MCQUILLIN, THE LAW OF MUNICIPAL CORPORATIONS § 24:9 (3d ed. 2025) (noting that the police power is "broad" and "dynamic" and that "[j]udicial utterances uniformly recognize that limitations upon the police power are difficult to define"); Hugh D. Spitzer, *Municipal Police Power in Washington State*, 75 WASH. L. REV. 495, 495 (2000) (addressing confusion in case law regarding the "nature and extent of police power—or regulatory power—as exercised by general purpose governments such as cities and counties").

power). Our state courts routinely recognize that cities have broad regulatory power to protect the public.[3]

The Opinion reasons "that at least some of the services DBIA provides, such as public safety and sanitation, support the peace, security, health, and general welfare of the city and thus are core governmental functions." Slip. Op. at 15. If that is now the standard under *Telford*, it effectively means that most government contractors are performing "core" governmental functions and likely subject to the Public Records Act.[4]

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[3] *See Watson v. City of Seattle*, 189 Wn.2d 149, 167, 401 P.3d 1 (2017) (discussing broad authority delegated to first-class cities); *Emerald Enters., LLC v. Clark Cnty.*, 2 Wn. App. 2d 794, 803, 413 P.3d 92 (2018) (discussing broad police power of local government); *Lakehaven Water & Sewer Dist. v. City of Federal Way*, 195 Wn.2d 742, 762–63, 466 P.3d 213 (2020) (recognizing broad power of code cities).

[4] Even though *Telford* remains a balancing test, there can be no denying that expanding the scope of the "government function" factor is likely to tip the scales in many cases, particularly since the stated purpose behind the *Telford* test is to identify private entities that have "effectively assumed the role of government." *Fortgang*, 187 Wn.2d at 526.

Moreover, the majority's conclusion conflicts with prior case law recognizing that many of those same types of services are ***not*** considered "core" governmental functions. *See Spokane Rsch. & Def. Fund v. W. Cent. Cmty. Dev. Ass'n*, 133 Wn. App. 602, 609, 137 P.3d 120 (2006) (entity providing community services to low-income residents was not performing core governmental function); *McKee v. Paratransit Servs.*, 13 Wn. App. 2d 483, 495, 466 P.3d 1135 (2020) (broker of medical transit services did not perform core governmental function). As the Court of Appeals has observed: "[S]erving public interests is not the exclusive domain of the government." *Spokane Rsch. & Def. Fund*, 133 Wn. App. at 609.

As another example, public agencies build and maintain infrastructure to protect the public health and safety, from safer roads to levees and other flood control measures. Under the majority's reasoning, private entities providing architectural, engineering, and construction services on those projects may now be the functional equivalents of public agencies because

those functions "support the peace, security, health, and general welfare of the city and thus are core governmental functions." Slip Op. at 15.

In this case, the City has retained its core government functions: it adopted the ordinances establishing the MID; it imposes and collects the ratepayer assessments;[5] and it controls the operations of its uniformed police officers.[6] The City is required by the PRA to maintain and disclose public records relating to all of these functions, and it negotiates the recordkeeping, audit, and other requirements of its contractors.

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[5] CP 107–09; CP 173 (ordinance providing for City collection of assessments and contract for program management).

[6] CP 249 (contract with Seattle Police Department (SPD) noting that the City provides funding for "supplemental police services . . . in addition to police services already provided within the DBIA boundaries, with the intent not to alter [the City's] current method of determining and maintaining police services for and within the DBIA"); CP 250 (contract with SPD stating: "Assignment of personnel to accomplish the supplemental police services requested under Task Orders related to this Agreement shall be at the sole discretion of the CITY's Police Chief or her designee.").

The City has contracted with DBIA to act as a program manager for certain other functions that the Legislature has expressly permitted chambers of commerce and similar private entities to perform. RCW 35.87A.110; CP 107. That those functions promote the health, safety, and welfare of downtown Seattle should not mean that the contractor is performing "core governmental functions" under *Telford*. For the *Telford* test to meaningfully distinguish ordinary private contractors serving the public benefit from those who have "effectively assumed the role of government," *Fortgang*, 187 Wn.2d at 526, the Opinion should be clarified on reconsideration to modify its discussion regarding municipal police powers. Otherwise, the Opinion will "sweep within PRA coverage every private organization that contracts with government." *Fortgang*, 187 Wn.2d at 532.

2. The Court Should Clarify What Specific Services DBIA Provides that the Court Holds Are "Core Governmental Functions."

The Opinion concludes under the first *Telford* factor that "at least some of the services DBIA provides, such as public

safety and sanitation" are core governmental functions. Slip Op. at 15. On reconsideration, to the extent the Court reaches the same conclusion, it should specify which of DBIA's services are deemed to be core governmental functions. Otherwise, DBIA and other private entities and public agencies are left without clear guidance from this Court about what activities will directly subject private entities to the Public Records Act.

a. The "Sanitation" Work Performed by DBIA Is Not the Exclusive Domain of Government.

The majority states that sanitation is a core government function. Slip Op. at 15. The Court should reconsider, or at least clarify, this determination. Sanitation is a function frequently performed by contracted private entities. *See, e.g.*, *Ventenbergs*, 163 Wn.2d at 101 (although solid waste ***management*** is a government function and an exercise of municipal police powers, cities may contract with private entities for solid waste ***handling***).

DBIA does not dispute that solid waste management planning and policy is the work of government. *See* ch. 70A.205 RCW. But the work actually performed by DBIA ambassadors—the manual work of cleaning garbage and debris from sidewalks and cleaning graffiti with permission of private property owners—is not the exclusive domain of government. *See* CP 564. Moreover, none of the work of DBIA's ambassadors displaces the City's garbage collection or other services; it is undisputed that these services supplement the services already provided by the City. CP 164 (services funded by MID assessments "are not intended to displace any services regularly provided by municipal government"); *see also* CP 278 (City retains government authority under Parks contract).

b. The Court Should Clarify which "Public Safety" Functions Are "Core" Government Functions.

Similarly, the Court should clarify which "public safety" functions subject DBIA to the PRA under *Telford*. While exercising law enforcement authority (such as making arrests and

enforcing the law) is a core governmental function, the fact that a contractor performs a public safety-related service has not previously subjected that entity to the PRA. *Compare Clarke*, 144 Wn. App. at 193 (nonprofit charged with enforcing animal control laws, including seizing and destroying pets, was exercising local government's law enforcement powers), *with Shavlik v. Dawson Place*, 11 Wn. App. 2d 250, 260–64, 452 P.3d 1241 (2019) (entity providing forensic interviewers who coordinated with law enforcement did not perform inherently governmental functions where staff had "no control over investigatory or charging decisions because they are made exclusively by law enforcement or the prosecuting attorney").

The Opinion suggests that DBIA's identification of "neighborhood hot spots" for Seattle Police Department patrols, while not "dispositive, ***resembles*** a government function." Slip. Op. at 14 n.4 (emphasis added). But the Opinion does not say that DBIA's contract with SPD by itself subjects DBIA to the PRA. If the "core" government function upon which the Opinion

relies arises from DBIA's contract with SPD, the Opinion should directly say so. This guidance is critical for DBIA and other entities and public agencies to understand the potential scope of their respective Public Records Act obligations.

Aside from DBIA's contract with SPD, DBIA employs downtown ambassadors who support cleaning, safety, and hospitality functions, assisting transit riders with bus schedules, providing visitors and tourists with directions, and downtown event planning and staffing. CP 107. DBIA's ambassadors conduct welfare checks on unhoused individuals, and carry Narcan, but they do not enforce any laws. CP 564–65; CP 107–08. It is not clear from the Opinion which (if any) of these services is the performance of a "core" governmental function.

DBIA also contracts with unarmed private security guards to provide "on-site guarding, crowd management, [and] safety inspections" for public and private properties, and to perform courtesy check-ins with businesses in order to increase the peace of mind and sense of safety in the MID service area. CP 75, 108,

256, 266. These unarmed private security guards do not enforce any laws; indeed, by law, they cannot. *See* CP 108 & CP 256–68; RCW 18.170.160(6)–(7); RCW 18.170.010(19) & (21) (defining "sworn peace officer" as a government employee with "law enforcement powers" separately from "private security guard"). Again, under the majority's reasoning, it is not clear whether this Court considers these functions to be "core" government functions. *Cf.* Slip Op. of Madsen, J., at 9 (concurring in part and dissenting in part) ("Private security guards are not equivalent to governmental law enforcement."). The Opinion fails to recognize the crucial distinction between performing services that ***support the goals*** served by the municipal police power with ***actually exercising*** that police power.

The Court should clarify its Opinion to specify the "public safety" services DBIA performs that the Court considers to be "core" governmental functions.

B. **The Opinion Does Not Analyze the Parking and Business Improvement Area Enabling Statute.**

Unlike the Court's discussion in *Fortgang*, the Opinion here makes no distinction between that which government ***can*** do (through its police power) and that which government ***must*** do (an inherently governmental, nondelegable function). As this Court previously observed, it "makes sense" to distinguish these two concepts in evaluating functional equivalence under *Telford. Fortgang*, 187 Wn.2d at 525–26 (describing the *Telford* test's purpose as identifying private entities that have "effectively assumed the role of government").

This Court in *Fortgang* looked to the applicable statutes in its government function analysis, considering the functions performed and whether the enabling legislation was permissive or mandatory. 187 Wn.2d at 526 & 533 (concluding that operation of a zoo is permissive and "not a nondelegable, 'core' government function," and so the case did not involve "the privatization of fundamentally public services"). The Court of

Appeals routinely analyzes applicable enabling legislation in its core government function analyses. *See Telford*, 95 Wn. App. at 163; *Shavlik*, 11 Wn. App. 2d at 261; *Clarke*, 144 Wn. App. at 192; *McKee*, 13 Wn. App. 2d at 492; *Freedom Found. v. SEIU Healthcare Nw., Training P'ship*, Nos. 76319-9-I, 76325-3-I, 2018 WL 4075920, at *9–*10 (Wash. Ct. App. Aug. 27, 2018) (unpublished, cited pursuant to GR 14.1); *see also* Slip Op. of Madsen, J., at 8 ("Therefore, a reviewing court must examine the legislation authorizing improvement districts.").

Here, the Opinion ignores that the Legislature made the establishment of parking and business improvement areas (PBIAs) permissive, not mandatory, and it expressly allows local governments to delegate the administration of PBIAs. *See* RCW 35.87A.010, .030, .100, .110; Slip Op. at 14–15.

Under state law, PBIAs are designed to promote economic development. RCW 35.87A.010 (authorizing creation of PBIAs "[t]o aid general economic development and neighborhood revitalization, and to facilitate the cooperation of merchants,

businesses, and residential property owners which assists trade, economic viability, and liveability"). State law defines the purposes for which PBIAs may be established. RCW 35.87A.010(1). And, where a PBIA is created, state law allows program manager functions, like DBIA's, to be delegated to a "chamber of commerce or other similar business association." RCW 35.87A.110.

It is undisputed that economic development is not the sole domain of government,[7] and by statute, DBIA's program management services can be delegated to the private sector.

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[7] *See* Am. Appellant's Br. at 39 ("The trial court was correct in concluding that Respondent performs some economic development functions that are not inherently governmental."); *see also Frederick v. City of Falls City*, 857 N.W.2d 569, 577 (Neb. 2015) (economic development is a permissible government function but not an essential government function), *cited with approval in Fortgang*, 187 Wn.2d at 525 n.7; *Dow v. Caribou Chamber of Com. & Indus*., 884 A.2d 667, 671 (Maine 2005) (economic development functions which included administration of development fund loan, tourism promotion, job creation, and business development were not governmental, noting "Chambers of Commerce are traditionally nongovernmental entities").

Ultimately, in construing a statute like the Public Records Act, the Court is guided by legislative intent. *Ctr. for Env't L. & Pol'y v. Dep't of Ecology*, 196 Wn.2d 17, 29, 468 P.3d 1064 (2020) ("When construing a statute, this court's goal is to determine and effectuate legislative intent."). While it is true the PRA contains a strong mandate for transparency, Slip. Op. at 1, it is equally true that the Legislature has defined the purpose of a PBIA as promoting economic development and has expressly authorized cities to delegate the administration of a PBIA's operations to the private sector. RCW 35.87A.110; RCW 35.87A.010.

Under the precedent of this Court and the Court of Appeals, DBIA's services are not a "core" function of government or "inherently governmental": cities are not required to form PBIAs in the first instance, and the functions DBIA performs as program manager are expressly delegable to the private sector. *See Fortgang*, 187 Wn.2d at 525–26 & 533; *Telford*, 95 Wn. App. at 163–64; *see also McKee*, 13 Wn. App. 2d at 491–92 (medical transit broker not performing core

government function where state's delegation of such services not prohibited).

On reconsideration, the Court should, consistent with prior *Telford* decisions, address whether the services performed by DBIA are core governmental functions that cannot be delegated, rather than functions which are merely something a municipality regulates or may choose to perform itself through its broad, constitutional police power. *See Fortgang*, 187 Wn.2d at 525 (noting that out-of-state cases focus on whether enabling legislation "defines the 'function' at issue as an inherently public one, which cannot be delegated to the private sector, and/or whether the enabling legislation actually obligates the entity at issue to perform that function"); *id.* (rejecting argument that an "entity performs a government function any time it contracts with the government pursuant to enabling legislation").

C. **The Opinion Changes the *Telford* Test by Stating Its Four Factors Are Not Exclusive and by Considering a Fifth Factor.**

In addition to changing the government function portion of the test, the Court's Opinion also (1) suggests the four *Telford* factors are not exclusive and (2) considers a fifth factor in its *Telford* analysis. Slip Op. at 12 & 17. But for the past 25 years, Washington courts have used four factors as the exclusive factors of the *Telford* balancing test. *Telford*, 95 Wn. App. at 163 (adopting four-factor test used by Connecticut courts and rejecting the six-factor test used in Oregon); *Fortgang*, 187 Wn.2d at 512–13 & 523 (describing *Telford* as a four-factor test and adopting it).[8]

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[8] *See also, e.g.*, *Spokane Rsch. & Def. Fund*, 133 Wn. App. at 608 (acknowledging the *Telford* test); *Clarke*, 144 Wn. App. at 192 (applying *Telford*'s four-factor test); *West v. State*, 162 Wn. App. 120, 129, 252 P.3d 406 (2011) (describing the *Telford* as "a four-factor balancing test"); *West v. Wash. State Ass'n of Dist. & Mun. Ct. Judges*, 190 Wn. App. 931, 936, 361 P.3d 210 (2015) (noting the court in *Telford* used a "four-factor test"); *Cedar Grove Composting, Inc. v. City of Marysville*, 188 Wn. App. 695, 719, 354 P.2d 249 (2015) (describing the four-factor *Telford* test); *Worthington v. Westnet*, 182 Wn.2d 500, 508–09 & n.5,

Neither party to this litigation briefed the issue of reformulating the *Telford* test to add new factors. *See* Pet. for Review at 3 (identifying the issue as standard of review); Resp't Supp. Br. at 14; Pet'r's Supp. Br. at 12 (identifying the *Telford* test as having "four factors"); *see also* Wash. Supreme Court oral argument, *Horvath v. DBIA Servs.*, No. 103339-7 (May 27, 2025), at 5:44–5:48 & 16:54–17:08, *video recording by TVW*, Washington State's Public Affairs Network, available at https://tvw.org/video/washington-state-supreme-court-2025051176/ (Petitioner's counsel arguing the *Telford* test has "four elements," and DBIA's counsel answering Justice Johnson regarding his comment that "I don't think that there has been any

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341 P.3d 995 (2015) (acknowledging four "specific '*Telford* factors'"); *Freedom Found.*, 2018 WL 4075920, at *8 (unpublished, cited pursuant to GR 14.1); *Shavlik*, 11 Wn. App. 2d at 255–56; *Strand v. Council 2-Wash. State Council of Cnty. & City Emps.*, No. 36233-7-III, 2019 WL 6790309 (Wash. Ct. App. Dec. 12, 2019) (unpublished, cited pursuant to GR 14.1); *Wash. State Ass'n of Mun. Att'ys v. Wash. Coal. for Open Gov't*, No. 80266-6-I, 2020 WL 7342171, at *3 (Wash. Ct. App. Dec. 14, 2020) (unpublished, cited pursuant to GR 14.1); *McKee*, 13 Wn. App. 2d at 490–91.

argument made here that the *Telford* test itself should be modified in any way").

Government agencies and private entities alike rely on this Court's decisions interpreting the PRA to ensure they are complying with their legal obligations. The Court's change to the structure of the *Telford* test after 25 years of precedent damages agencies and private entities who have relied on our courts' statements of the law. *See City of Federal Way v. Koenig*, 167 Wn.2d 341, 346, 217 P.3d 1172 (2009) (in PRA case, explaining interests underlying stare decisis, including "'predictable, and consistent development of legal principles" and "foster[ing] reliance on judicial decisions'" (internal quotations omitted)).

V. CONCLUSION

The Court should reconsider and clarify its Opinion in this case. In particular, the Court should amend its analysis of the first *Telford* factor. Clarification is important not only for DBIA, but because many other private entities will need to examine this Court's reasoning to determine their own obligations. A wide

range of contractors—both nonprofits like DBIA and for-profit businesses—perform health, safety, and sanitation related functions. If those entities receive a majority of their funds from government agencies, this Court's Opinion would treat them as subject to the Public Records Act. At minimum, the Opinion creates significant uncertainty and risk for those entities about their legal obligations.

Whether or not the Court reconsiders the ultimate outcome of its decision as to DBIA, it should modify the Opinion to provide greater clarity for DBIA, public agencies, and the many private entities who contract with government or provide services that benefit the public.

* * *

RAP 18.17(b) Certificate of Compliance with Word Limitations: The undersigned attorneys certify that this pleading contains 4,238 words, in compliance with RAP 18.17(c).

Respectfully submitted this 7th day of January, 2026.

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CERTIFICATE OF SERVICE

I hereby certify that I am a legal assistant at Foster Garvey PC and that I filed this pleading with the Washington Supreme Court and served the pleading via e-mail on the following:

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I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Executed at Seattle, Washington, on January 7, 2026.

/s/ McKenna Filler
McKenna Filler

FOSTER GARVEY PC

January 07, 2026 - 4:41 PM

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Comments:

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