

1996

West Valley City v. Dawn Sweazey : Brief of Appellant

Utah Court of Appeals

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J. Richard Catten; Office of the West Valley City Prosecutor; Counsel for Plaintiff/Appellee.

Mark J. Gregersen; L. Bruce Larsen; Larsen & Rammell; Co-Counsel for Defendant/Appellant.

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**UTAH COURT OF APPEALS
BRIEF**

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DOCKET NO. 960724-CA

IN THE UTAH COURT OF APPEALS

West Valley City,
Plaintiff and Appellee,
v.
Dawn Sweazey,
Defendant and Appellant.

Case No. 960724 - CA
Priority two

BRIEF OF APPELLANT

AN APPEAL FROM THE THIRD JUDICIAL COURT OF SALT LAKE COUNTY,
WEST VALLEY DEPARTMENT, THE HONORABLE RONALD E. NEHRING

Counsel for Plaintiff/Appellee:

J. Richard Catten, Esq.
Office of the West Valley City Prosecutor
3600 South Constitution Blvd. West
Valley City, Utah 84119
801-963-3331

Co-Counsel for Defendant/Appellant:

Mark J. Gregersen, #6553
1313 North 200 East; P.O. Box 456
Centerville, Utah 84014
801-296-8272; Fax 801-292-0335

L. Bruce Larsen, #1893
Larsen & Rammell
3600 South Market Street, Suite 100
West Valley City, Utah 84119
801-964-1200

FILED

Utah Court of Appeals

JAN - 8 1998

Julia D'Alessandro
Clerk of the Court

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7 **IN THE UTAH COURT OF APPEALS**
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11 Plaintiff and Appellee,
12 v.
13 Dawn Sweazey,
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20 **WEST VALLEY DEPARTMENT, THE HONORABLE RONALD E. NEHRING**
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Counsel for Plaintiff/Appellee:

J. Richard Catten, Esq.
Office of the West Valley City Prosecutor
3600 South Constitution Blvd. West
Valley City, Utah 84119
801-963-3331

Co-Counsel for Defendant/Appellant:

Mark J. Gregersen, #6553
1313 North 200 East; P.O. Box 456
Centerville, Utah 84014
801-296-8272; Fax 801-292-0335

L. Bruce Larsen, #1893
Larsen & Rammell
3600 South Market Street, Suite 100
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801-964-1200

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Clark on Surveying & Boundaries § 2.03 (6th Ed. 1992), citing <u>Rivers v. Lozeau</u> , 539 So.2d 1147 (Fla. App. 1 989)..	9, 10
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2 **IN THE UTAH COURT OF APPEALS**

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7 Dawn Sweazey,
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Case No. 960724 - CA
Priority two

10 **BRIEF OF APPELLANT**

11 AN APPEAL FROM THE THIRD JUDICIAL COURT OF SALT LAKE COUNTY,
12 WEST VALLEY DEPARTMENT, THE HONORABLE RONALD E. NEHRING

13
14 **STATEMENT SHOWING JURISDICTION OF THE APPELLATE COURT**

15 This Court has jurisdiction to hear this matter pursuant to Utah Code section 78-2a-
16 3(2)(d) (f), and Rule 3 of the Utah Rules of Appellate Procedure.
17

18 **STATEMENT OF THE ISSUES**

19 1. Regarding count four (fence violation):

20 A. Is a statute constitutional which purports to define legal boundary lines
21 according to plats maintained by the county recorder?

22 B. When no evidence of boundary location is presented at trial through a
23 licenced surveyor, can there be sufficient evidence to find a violation of a setback rule?

24 Note that the constitutionality of the statute, and the location of property
25 boundaries on the ground, were not argued below. However, "An error going to the
26 foundation of the action will be noticed and reviewed on appeal whether or not it was
27 assigned." Lamb v. Bangart, 525 P.2d 602, 611, citing Wagner v. Coronet Hotel, 10 Ariz.
28 App. 296, 458 P.2d 390, 394 (1969).

1 2. Regarding count five (set-back of structures), when a defendant is alleged to
2 have loose cinder blocks on her property, can these blocks constitute a “building or
3 structure,” as required for a violation of West Valley Ordinance section 7-6-305(1)?
4 (Preserved for appeal: Record 154-155.)

5 3. Regarding count six (permitted used), can a box car be found present on the
6 property, when a photograph alleged taken on the date of the violation, shows that the box
7 car is absent? (Preserved for appeal: Record 154-155; and Trial Transcript 138:12-21.)¹

8 4. Regarding count seven (solid waste), can there be a finding that “solid waste”
9 consisting of bricks present on the property, when the evidence provides no basis to conclude
10 that bricks were present? (Argument of chronology of photos: preserved at Trial Transcript
11 140:1-17; see also Record 155-159.)

12 5. Regarding count eight (automobiles as solid waste), can there be a finding that
13 “solid waste” consisting of automobiles was present on the property, when the investigating
14 officer testified that the vehicles had been removed prior to the date of the alleged violation?
15 (Preserved: Trial Transcript 144:13-26; and 145:1-8; Record 157.)

16 6. Regarding count nine (property kept clean), can there be a finding that bricks
17 were present on property, and that defendant failed to keep her property clean, when there
18 is no basis to find that bricks were present on the alleged date of violation? (Preserved: Trial
19 Transcript 142:1-4; Record 155-159.)

20 Standard of Review: This appeal is from a judgment entered upon a jury verdict in a
21 criminal case. Therefore, the standard of review as to the issues is whether the evidence is
22 sufficiently inconclusive or inherently improbable that reasonable minds must have
23 entertained a reasonable doubt that the defendant committed the crime of which she was
24 convicted. See State v. Workman, 852 P.2d 981, 985 (Utah 1993). With regard to the claim
25

26
27 ¹ The Court Reporter’s Transcript of the trial has not been renumbered
28 sequentially with the record on appeal. Therefore, the Reporter’s Transcript is cited herein
according to the original page numbers provided therein by the Reporter.

1 of unconstitutionality of West Valley City ordinances, the Court of Appeals reviews this
2 issue as a matter of law, with no deference to the trial court.

4 DETERMINATIVE STATUTES

5 West Valley Ordinance § 7-2-117(2), provides as follows:

6 “In front yards a 20-foot setback from the front property line shall be maintained for
7 fences over four feet in height. Fences four feet or less in height, which are at least 50%
8 transparent, may be allowed up to the front property line or, if a sidewalk exists, up to the
9 sidewalk. No solid fence over 2 feet in height shall be allowed closer than 20-feet to the
10 front property line.”

11 West Valley City Code § 7-6-305(1) provides as follows:

12 “The following shall be the minimum lot areas, widths and setbacks in single-family
13 residential zones:

14	“ <u>Zone</u>	...	<u>E</u> [front setback]
----	---------------	-----	--------------------------

15	“R-1-6	...	25'
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16
17 West Valley City Code § 7-6-303 provides as follows:

18 “The following are permitted uses in all single-family residential zones; no other
19 permitted uses are allowed, except as provided in section 7-2-114: (1) agriculture, (2)
20 community uses, (3) home occupations--minor, (4) household pets, (5) signs (see title 11 -
21 sign ordinance), (6) single-family dwellings, (7) uses customarily accessory to listed,
22 permitted uses.”

23 West Valley City Code § 24-2-111(1) provides as follows:

24 “It shall be unlawful for any person to accumulate, throw, discard, deposit, place,
25 sweep, dump, conduct, or allow any person to accumulate, throw, discard, deposit, place,
26 sweep, dump, or conduct any solid waste or litter into or upon any public place, private
27 premises, street, road, alley, property abutting any alley, stream, well, spring, canal, ditch,
28 gutter, lot, or any other property or place, or above or below ground level ...”

1 West Valley City Code § 24-8-105(4) provides as follows:

2 “It shall be unlawful for any person owning or occupying real property within West
3 Valley City, after receiving written notice from the Department, to fail. ¶...¶ (4) to maintain
4 or repair any unsightly or deleterious objects or structures, as defined in this chapter.”

5
6 **STATEMENT OF THE CASE**
7

8 **A. NATURE OF THE CASE**

9 This case is in the nature of a criminal action, in which Defendant Dawn Sweazey was
10 prosecuted by Plaintiff West Valley City for zoning violations, alleged to have occurred on
11 January 27, 1995, in West Valley City.

12
13 **B. COURSE OF PROCEEDINGS**

14 The case was commenced on March 27, 1995. An Amended formal information was
15 filed on March 21, 1996. A jury trial was held on August 21, 1996, before the Honorable
16 Ronald E. Nehring, of the Third District Court, at West Valley City.

17
18 **C. DISPOSITION IN TRIAL COURT**

19 At the conclusion of the trial, Defendant Sweazey was found guilty of counts 5
20 through 9. On September 3, 1996, Defendant filed a motion for Judgment Notwithstanding
21 the Verdict. Defendant was sentenced on September 30, 1996.

22
23 **D. STATEMENT OF FACTS RELEVANT TO ISSUES**

24 Defendant/Appellant is an owner of the residence located at 7174 West Tenway, West
25 Valley City, Utah. It is alleged that she engaged in various code violations on January 27,
26 1995. Defendant/Appellant stipulated that she is the owner of the property. Trial Transcript
27 31:12-14. Defendant also stipulated that her fence extended to “the point of the sidewalk on
28 the side yard boundary of the property.” Trial Transcript 58:22-25.

1 The City claimed that Photographs/exhibits 19 through 23 were taken on January 27,
2 1995. Trial Transcript 69:4-12. These photographs show that an object referred to as a "box
3 car," was no longer present on the property on the date the photographs were taken. See
4 Motion for Judgment Notwithstanding the Verdict, Record 155.

5 At trial, the Plaintiff/Appellee West Valley City, agreed that as of January 27, 1995,
6 Defendant/Appellant had cleaned up and removed the tree limbs and trash. Trial Transcript
7 101:20-26.

8 Photographs 16 and 17 were taken on January 16, 1995. Trial Transcript 57:1-8.
9 These photographs show a wall which has been completed. See Trial Transcript 56:9-17; and
10 57:1-2. Photographs 19-23 show a wall which is still under construction. See Motion for
11 Judgment Notwithstanding the Verdict, Record 158.

12 Officer Nordell testified that the inoperable vehicles had been removed from the
13 property. Trial Transcript 56. On a later occasion during trial, Officer Nordell testified that
14 she believed one of the vehicles still remained on the property. Trial Transcript 64.

15 Of the various items which Defendant/Appellant was requested to remove from the
16 property, Officer Nordell observed that only the bricks remained, as of January 16, 1995.
17 Trial Transcript 56:15-20; and 57:10-12.

20 SUMMARY OF THE ARGUMENT

21 The photographs and testimony offered at the jury trial, strongly contradicted (and
22 provided no basis for) a finding that Defendant Sweazey committed land use violations at
23 her residence on January 27, 1995.

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**REGARDING COUNT FOUR--FENCE VIOLATION:
THE CONVICTION CANNOT STAND, BECAUSE A) THE STATUTE IS
UNCONSTITUTIONAL WHICH PURPORTS TO DEFINE LEGAL BOUNDARY
LINES ACCORDING TO PLATS MAINTAINED BY THE COUNTY
RECORDER, AND B) NO EVIDENCE OF BOUNDARY LOCATION WAS
PRESENTED AT TRIAL THROUGH A LICENCED SURVEYOR, WHO CAN
LOCATE BOUNDARIES ON THE GROUND**

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1 1147 (Fla. App. 1989). See also, Utah Code § 58-22-602(3) (“Any final plan, map, ... plat,
2 and report shall bear the seal of the professional land surveyor licensed under this Chapter
3 ... when filed with public authorities.”) Here, no evidence of actual boundary location was
4 offered at trial by any land surveyor. Thus, there was no competent evidence of the distance
5 between the fence and the legal property boundary.

6
7
8 **B.**
9 **REGARDING COUNT FIVE--SET BACK OF STRUCTURES:**
10 **WHEN THE DEFENDANT IS ALLEGED TO HAVE LOOSE CINDER BLOCKS**
11 **ON HER PROPERTY, THESE BLOCKS CANNOT REASONABLY**
12 **CONSTITUTE A BUILDING OR STRUCTURE, AS REQUIRED FOR A**
13 **VIOLATION OF WEST VALLEY ORDINANCE SECTION 7-6-305(1)**

14 West Valley City alleges as Count 5, that Defendant violated West Valley City Code
15 section 7-6-305(1), regarding set back, by having blocks and a box car in the set-back area.

16 West Valley Code § 7-6-305 declares that the front yard set back is to be 25 feet. Yet
17 the fence ordinance found at West Valley Code § 7-2-117, declares that a fence in a front
18 yard need only be 20 feet from the front property line. Therefore, West Valley City’s set
19 back rule does not contemplate the governance of fences. Understandably, Officer Nordell
20 testified similarly, by declaring at trial that although West Valley ordinances impose a 25-
21 foot setback requirement as to structures, this requirement does not apply to fences, which
22 need be set back only 20 feet. See Trial Transcript 62:1-5. Therefore, the fence could not
23 violate this ordinance, and indeed was not alleged to violate the ordinance.

24 However, the Plaintiff/City did allege that a “box car” violated section 7-6-305(1).
25 Photographs/exhibits 19 through 23 show that a “box car” is no longer present on the
26 property. (See Motion for Judgment Notwithstanding the Verdict, Record 155; Closing
27 Argument of Defense Attorney Ben Hamilton at Trial Transcript 138 through 139.)
28 Photographs 19 through 23 were claimed to have been taken by Officer Nordell on January
27, 1995. See Trial Transcript 69:4-12.

Since Count 5 alleges that the violative items were the box car and the blocks, and
since the photographs show an absence of the box car as of the violation date of January 27,

1 1995, the sole potential violative item would have been the cinder blocks. However, a block
2 is not a "building or structure," as required for a violation of 7-6-305(1). Further, as to the
3 "box car," there is no evidence that it was "constructed" on the property, rather than merely
4 moved there.

5 **C.**
6 **REGARDING COUNT SIX--PERMITTED USES:**
7 **A BOX CAR CANNOT BE FOUND TO BE PRESENT ON THE PROPERTY,**
8 **WHEN A PHOTOGRAPH TAKEN ON THE DATE OF THE ALLEGED**
9 **VIOLATION, SHOWS THAT THE BOX CAR WAS NOT PRESENT**

10 West Valley City alleges as Count 6 that Defendant violated West Valley Code
11 section 7-6-303, regarding permitted uses, by having a "large box car" on her property, when
12 such was not permitted in a residential zone. However, as discussed above, the photographs
13 purported to have been taken on January 27, 1995, show that the box car is not present. Thus,
14 no basis exists to conclude that a violation occurred.

15 **D.**
16 **REGARDING COUNT SEVEN--SOLID WASTE:**
17 **THERE CAN BE NO FINDING THAT "SOLID WASTE" CONSISTING OF**
18 **BRICKS IS PRESENT ON THE PROPERTY, WHEN THE EVIDENCE**
19 **PROVIDES NO BASIS TO CONCLUDE THAT BRICKS WERE PRESENT**

20 As Count 7, West Valley City alleged that Defendant violated West Valley Code
21 section 24-2-111, regarding the accumulation of solid waste, by having on her property tree
22 limbs, broken bricks, and trash. See Amended Information, Record 88-89.

23 During the trial, Prosecutor Keith Stoney acknowledged that as of January 27, 1995
24 (the date of the alleged violation), Defendant had cleaned up the tree limbs and the trash.
25 Therefore, the sole potential violative item under Count 7, would have been bricks.

26 However, the evidence shows that no bricks were present: Photographs/exhibits 16
27 and 17 were taken on January 16, 1995. Trial Transcript 57:1-8. These photographs show
28 a block wall which has been completed. Trial Transcript 56:9-17; and 57:1-2. On the other
hand, photographs/exhibits 19 through 23, show this same block wall, while it is still
undergoing construction. See Motion for Judgment Notwithstanding the Verdict, Record 158.
Therefore, if Officer Nordell's testimony is to be relied upon (which the jury obviously did

1 in finding the violations), it is clear that photographs 19 through 23 were taken prior to
2 January 16, 1995, when photos 16 and 17 were taken. Thus, photos 19 through 23 fail to
3 show the status of the property as of the alleged violation date of January 27, 1995.

4 Further, Officer Nordell relied on the photographs for her conclusion as to whether
5 the bricks were present on January 27, 1995. Officer Nordell was unable to testify as to the
6 presence of the bricks, without first referring to photos 13 through 17. See Trial Transcript
7 56:7-10. Therefore, no reasonable basis exists on which the jury could have found that bricks
8 were present. Thus, there is no basis to sustain the finding of any of the items alleged to be
9 violative of Count 7.

10
11 **E.**
12 **REGARDING COUNT EIGHT--AUTOMOBILES AS SOLID WASTE:**
13 **THERE CAN BE NO FINDING THAT "SOLID WASTE" CONSISTING OF**
14 **AUTOMOBILES IS PRESENT ON THE PROPERTY, WHEN THE**
15 **INVESTIGATING OFFICER TESTIFIED THAT THE VEHICLES HAD BEEN**
16 **REMOVED PRIOR TO THE DATE OF THE ALLEGED VIOLATION**

17 West Valley City alleges as Count 8 that Defendant violated West Valley Code
18 section 24-2-111, again regarding the accumulation of solid waste, by having on her property
19 two vehicles which were unlicensed or inoperable. Again, no basis exists on which to find
20 that these vehicles were present as of the alleged date of violation. At the trial, West Valley
21 City Ordinance Enforcement Officer Nordell testified as follows in response to questioning:
22 "Q: ... Did you visit the property on the 16th of January 1995? A: I did. ...¶ The vehicles, the
23 three vehicles that were there, are no longer there." Transcript 56. Therefore, Officer Nordell
24 negated any facts under which a jury could have found the presence of automobiles.

25 Later, Officer Nordell speculated that the Camaro was still present on the property:
26 "Q: What vehicles were still there on that sixteenth day [of January 1995]? A: The vehicle,
27 the Camaro was, I believe, behind the box car. The other two vehicles that were on the
28 property she had moved across the street" Transcript 64. However, Officer Nordell shows
no basis for her speculation that the Camaro automobile remained on the property. Thus, the
conviction of Count 8 cannot be affirmed.

1 **F.**
2 **REGARDING COUNT NINE--PROPERTY KEPT CLEAN:**
3 **THERE CAN BE NO FINDING THAT BRICKS WERE PRESENT ON**
4 **PROPERTY, AND THAT DEFENDANT FAILED TO KEEP HER PROPERTY**
5 **CLEAN, WHERE THE EVIDENCE IS CLEARLY TO THE CONTRARY**

6 West Valley City alleges as count 9, that Defendant violated West Valley Code
7 section 24-8-105(4), regarding keeping property clean, by having unsightly or deleterious
8 objects or structures. Such language is void for vagueness, since it is unclear what objects
9 may be considered "unsightly."

10 In addition, the finding of a violation is not supported by any evidence: Under the
11 ordinance, the Plaintiff/City must prove that Defendant failed to clean up specific items, after
12 being requested by the City to do so. Exhibit 12 constituted the exclusive notice given to
13 Defendant regarding the cleanup required by the Plaintiff. Trial Transcript 65:26; 66:1-2.
14 The notice mentioned vehicles, appliances, furniture, garbage bags, bricks, and cinder blocks.
15 See Trial Transcript 55:1-14, referring to Notice of December 6, 1994, admitted at trial as
16 Exhibit 12. When Officer Nordell visited the property on January 16, 1995, she observed that
17 of these items, only the bricks remained. See Trial Transcript 56:15-20; and 57:10-12.
18 Therefore, Officer Nordell's testimony negates the presence of all items except bricks. And
19 as shown above, no justification was provided for finding that bricks remained present 11
20 days later on January 27, 1995.

21 **G.**
22 **STANDARD OF REVIEW**

23 This appeal is from a judgment entered upon a jury verdict in a criminal case.
24 Therefore, the standard of review as to the issues is whether the evidence is sufficiently
25 inconclusive or inherently improbable that reasonable minds must have entertained a
26 reasonable doubt that the defendant committed the crime of which she was convicted. See
27 State v. Workman, 852 P.2d 981, 985 (Utah 1993). With regard to the claim of
28 unconstitutionality of a West Valley City ordinance, the Court of Appeals reviews this issue
as a matter of law, with no deference to the trial court.

1 **CONCLUSION AND RELIEF SOUGHT**

2 Defendant/Appellant Dawn Sweazey was convicted, without justification, as to
3 Counts 4 through 9. Accordingly, it is requested that each of these convictions be overturned.
4

5 **STATEMENT REGARDING ADDENDUM**

6 No addendum is necessary.
7

8 Dated this 8th day of January 1998.

9 

10 MARK J. GREGERSEN,
11 Co-counsel for Defendant/Appellant
12 Dawn Sweazey
13
14
15
16

17 **CERTIFICATE OF MAILING**

18 I hereby certify that on the date set forth below, I served two true and correct copies
19 of the document entitled BRIEF OF APPELLANT by placing copies of this document in the
20 mail, postage prepaid in an envelope addressed as follows:

21 (Counsel for Plaintiff/Appellee:)
22 J. Richard Catten
23 West Valley City Senior Attorney
3600 South Constitution Blvd.
West Valley City, UT 84119

24 Dated this 8th day of January 1998.

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26 C:\OFFICE\WPWIN\WPDOS\LAWBIZ\OPRATION\OPENSWEAZEY\BRIEF01 WPD
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