

2011

Utah Down Syndrome Foundation v. Utah Down Syndrome Association : Opening Brief of Appellee

Utah Supreme Court

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IN THE UTAH SUPREME COURT

UTAH DOWN SYNDROME
FOUNDATION, INC.,

Plaintiff/Appellee,

vs.

UTAH DOWN SYNDROME
ASSOCIATION, et al.,

Defendants/ Appellants.

THE MEMBERS OF THE UPTOWN
DOWNS AND UP WITH DOWNS, the Salt
Lake and Utah County Chapters of the Utah
Down Syndrome Foundation,

Intervener.

Third District Court No. 070902087

Appellate Case No. 20110205-SC

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FILED
UTAH APPELLATE COURTS

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STATEMENT OF ISSUES

1. Where an attorney representing a party in an action converts funds to his own use during the pendency of the action, and said funds are the subject of the action, and a motion for disgorgement of funds is filed against the attorney in that action, and the attorney appears at a hearing before that Court and defends himself and does not object to the court having in personam jurisdiction over him, and the Court orders the attorney to disgorge the converted funds, may the attorney successfully claim 2 ½ years later that the Court lacked in personam jurisdiction over him at the time the matter was heard.

2. Where an attorney representing a party in an action converts funds to his own use during the pendency of the action, and said funds are the subject of the action, and a motion for disgorgement of funds is filed against the attorney, and the attorney appears at a hearing before the Court and defends himself and does not claim that he has been denied due process, and the Court orders the attorney to disgorge the converted funds, may the attorney successfully claim 2 ½ years later that he was denied due process.

STATEMENT OF CASE

On February 5, 2007, Utah Down Syndrome Foundation (“UDSF”) filed an action against Utah Down Syndrome Association, Eric Holman, Cathy Collard, Pam Holman, Jill Austin, Lisa Kingsbury, Kara Olander, and Mellanie Taylor to, among other things, compel the return of certain funds belonging to UDSF that were on deposit in two bank accounts controlled by defendants (the “Zions Bank Account” and the “America First Bank Account”). At that time Donald Gilbert represented Eric Holman and Mellanie Taylor in a related case, and also represented “Downtown Downs” and “Uptown Downs,” which were, respectively, the Salt Lake County Chapter and Utah

County Chapters of UDSF. (R.1336, pg 14.) Eric Holman, Cathy Collard, Pam Holman, Jill Austin, Lisa Kingsbury, Kara Olander, and Mellanie Taylor were officers of either “Upwith Downs” or “Downtown Downs.” On May 3, 2007, an Order was entered ordering the defendants in this case to "return [to UDSF] all funds taken from or on deposit in [the Zions Bank Account or the America First Bank Account] since October 20, 2006.” (R. 51-54)

On May 8, 2007, a copy of that Order was hand-delivered to Donald Gilbert. (R. 836) Donald Gilbert thereafter arranged for \$30,000 in legal fees to be paid to himself out of those accounts. (R. 836) On July 13, 2007, Donald Gilbert filed a Motion to Intervene in this case on behalf of “Upwith Downs” and “Uptown Downs,” which was granted. (R.78.) On September 26, 2007, Gilbert made an appearance in this case on behalf of all defendants.

On December 21, 2007, UDSF filed a Motion for Disgorgement of Funds against Donald Gilbert. (R. 849-850.) On February 1, 2008, Gilbert filed an opposing memorandum. (R. 872-877.) On March 18, 2008, Gilbert appeared at a hearing and defended against that motion (R. 1336.) At that time Mr. Gilbert did not object to the proceeding. At that time Mr. Gilbert did not claim that the Court lacked in personam jurisdiction over him, or that he had been denied due process. On June 13, 2008, the Court entered an Order and Judgment ordering Mr. Gilbert to disgorge \$30,000.00 in funds and to pay \$ 2,453.00 in attorney’s fees.

On November 30, 2010, Mr. Gilbert filed a Motion to Vacate, Expunge or Set Aside that Order and Judgment on the grounds that the Court did not have in personam jurisdiction over him and on the grounds that he had been denied due process. On January 14, 2011, Judge Maughn denied that motion. (R. 1299-1303.)

STATEMENT OF FACTS

1. The Utah Down Syndrome Foundation, Inc. (“UDSF”) is a non-profit corporation. (R.25.)
2. UDSF is a statewide organization with fourteen county chapters. (R. 26.)
3. In September, 2006, Eric Holman (“Holman”), Cathy Collard (“Collard”), Pam Holman (“P. Holman), and Jill Austin (“Austin”) were officers of the Utah County Chapter of UDSF (a.k.a. “Upwith Downs”), and Lisa Kingsbury (“Kingsbury”) and Mellanie Taylor (“Taylor”) were officers of the Salt Lake County Chapter of UDSF (a.k.a. “Uptown Downs.”) (R. 26.)
4. Contributions for UDSF received by the Utah County Chapter of UDSF were deposited in a bank account at First American Credit Union and contributions for UDSF received by the Salt Lake County Chapter of UDSF were deposited in an account at Zions Bank (collectively, the “Accounts.”). (R. 28-29.)
5. Both the Accounts were set up by UDSF for use by the local chapters and both were set up under UDSF’s Employer Identification Number. (R. 28-29.)
6. The signors on both accounts were the local chapter officers. (R. 28-29.)
7. In the summer and fall of 2006, the Salt Lake County Chapter of UDSF and the Utah County Chapter of UDSF refused to give UDSF an accounting of the funds on deposit in the Accounts. (R. 26.)
8. In the summer and fall of 2006, Holman, Collard, Kingsbury, Taylor, Austin and P. Holman refused turn over to UDSF the funds on deposit in the Accounts. (R. 27.)
9. Holman, Collard, Kingsbury, Taylor, Austin and P. Holman subsequently organized “Utah Down Syndrome Association,” an apparent competitor to UDSF.
10. On October 20, 2006, UDSF removed Holman, Collard, P. Holman, Austin, Kingsbury

and Taylor as officers of their respective chapters, and as members of UDSF. (R. 27.)

11. Since October, 2006, Donald Gilbert had been representing the Salt Lake County chapter of UDSF and the Utah County chapter of UDSF. R. 1336, pg 14.

12. On January 5, 2007, Donald D. Gilbert filed an action on behalf of Utah Down Syndrome Foundation, Uptown Downs, Upwith Downs, Eric L. Holman and Melanie Taylor against Suzie Smith and other officers of UDSF, titled UDSF et al. vs. Suzie Smith, et al., Civil No. 070900363 (the "First Action") seeking declaratory relief that Suzie Smith and other officers of UDSF did not have authority to act on behalf of UDSF.

13. On February 3, 2007, Utah Down Syndrome Foundation filed an action against Eric Holman, Cathy Collard, Pam Holman, Jill Austin, Lisa Kingsbury, Kara Olander and Melanie Taylor in Third District Court, Salt Lake County, titled UDSF v. Eric Holman, et al., Civil No. 070902087 (the "Second Action"), to obtain an accounting of and recovery of the UDSF funds in the Accounts. (R. 1.)

14. On July 13, 2007, an Answer was filed in the Second Action by attorney Graham Norris (R. 12-18.)

15. On May 3, 2007, an Order was entered in the Second Action ordering the defendants to "return [to UDSF] all funds taken from or on deposit in [the Zions Bank Account or the America First Bank Account] since October 20, 2006." (R. 51-54.)

16. On May 8, 2007, at a hearing in the First Action, a copy of the May 3, 2007 Order entered the First Action was hand-delivered to Donald D. Gilbert, the attorney for the Salt Lake County Chapters and Utah County Chapters of UDSF and the attorney for Eric Holman and Melanie Taylor in this First Action. (R. 836.)

17. Thereafter, Mr. Gilbert arranged for \$30,000.00 from the Accounts to be paid to himself as attorneys fees, rather than paid to UDSF, as ordered in the May 3, 2007 Order.¹ (R. 93.)

18. On July 13, 2007, Gilbert filed a Motion to Intervene on behalf of the Salt Lake County Chapters and Utah County Chapters of USDF. (R. 78.)

19. On September 26, 2007, Gilbert entered an appearance on behalf of the defendants. (R.197.)

20. On December 21, 2007, UDSF filed a Motion for Disgorgement of Funds against Donald Gilbert to disgorge \$22,500², which was mailed to Donald Gilbert, together with a supporting memorandum. (R. 835-848.)

21. On February 1, 2008, Mr. Gilbert filed a Memorandum in Opposition to that Motion for Disgorgement of Funds. (R. 851-863.)

22. On March 13, 2008, the Court held a hearing on UDSF's Motion for Disgorgement of Funds, at which Mr. Gilbert appeared and argued on his own behalf. (R.1336.)

23. At the March 13, 2008 hearing, Mr. Gilbert did not raise the claim that the Court lacked in personam jurisdiction over him. (R.1336.)

24. At the March 13, 2008 hearing, Mr. Gilbert did not raise the claim that he was being denied due process. (R.1336.)

¹On May 10, 2007, a check for \$6,000.00 was written from the America First Credit Union account to Donald Gilbert. On June 15, 2007, a check for \$9,000.00 was written from the America First Credit Union account to Donald Gilbert. On July 25, 2007, a check for \$7,500 was written from the Zion Bank account to Donald Gilbert. On January 31, 2008, a check for \$7,500.00 was written from the Zions account to Donald Gilbert.

²At that time, UDSF was unaware of the fourth check for \$7,500.00. UDSF subsequently filed an Amended Motion to Disgorge Funds for the \$7,500.00.

25. At the March 13, 2008 hearing, Mr. Gilbert argued the merits of the Motion for Disgorgement of Funds on his own behalf. (R.1336.)

26. At the conclusion of the March 13, 2008 hearing, the Court granted the Motion for Disgorgement of Funds. (R.1336.)

27. A Supplemental Memorandum in Support of Motion for Entry of Judgment was subsequently filed.

28. On June 13, 2008, an Order and Judgment were entered ordering Mr. Gilbert to disgorge those funds (\$30,000), as well as \$2,453.00 in attorney's fees related to that motion. (R.1082-1090.)

29. Mr. Gilbert did not appeal the Order and Judgment at that time.

30. On November 30, 2010, over 2 ½ years later, Mr. Gilbert filed a Motion to Vacate, Expunge or Set Aside the June 13, 2008 Order and Judgment, arguing for the first time that the Court lacked in personam jurisdiction over him and that he had been denied due process. (R.1187-1284.)

31. On January 14, 2011, the court denied that motion. (R. 1299.)

SUMMARY OF ARGUMENT

Gilbert is an attorney and officer of the Court. The Motion for Disgorgement of Funds was based on Gilbert's failure to obey a Court Order. At the time the Motion for Disgorgement of funds was filed, Mr. Gilbert represented defendants and interveners in the case. Mr. Gilbert received a notice of that motion, and appeared at the March 18, 2011 hearing and pled his case. The Court ruled against Mr. Gilbert, and entered an Order and Judgment on June 18, 2008 requiring that Mr. Gilbert disgorge \$30,000.00 in funds and pay \$2,453.00 in attorney's fees. Mr. Gilbert did nothing for 2 ½ years.

Mr. Gilbert now claims that the trial court did not have in personam jurisdiction over him.

That is nonsense. As an attorney, Mr. Gilbert is an officer of the court and has already submitted himself to the jurisdiction of the Court. Furthermore, Mr. Gilbert appeared before the Court at the March 18, 2008 hearing and defended himself on the Motion for Disgorgement of Funds. At that proceeding, Mr. Gilbert made no claim that the Court lacked in personam jurisdiction over him. Any claim of lack of in personam jurisdiction is without merit or has long ago been waived.

Mr. Gilbert also now claims that he was denied Due Process of law. Again, this is nonsense. Mr. Gilbert received a copy of the claims against him (set forth in the Motion for Disgorgement of Funds and accompanying memorandum) and appeared at the March 18, 2011 hearing and defended himself. At that hearing, Mr. Gilbert made no claim that the hearing failed to comply with Due Process. Any claim of denial of Due Process is without merit and has long ago been waived.

ARGUMENT

I. THE TRIAL COURT HAD IN PERSONAM JURISDICTION OVER GILBERT, OR THE ISSUE HAS BEEN WAIVED.

While Gilbert maintains that the court lacked in personam jurisdiction, all cases cited by Gilbert relating to personam jurisdiction involved defendants that had no actual notice of the proceeding against them and never appeared in the case. See Jackson Constr. Co. Inc. v. Marrs, 2004 UT 89; 100 p.3d 1211 (the party was served by publication only, and had no actual notice of the proceeding); Carlson v. Bos, 740 P.2d 1269 (Utah 1987) (the party was served by substitute service and had no actual notice of the proceeding); Murdock v. Banke, 484 p.2d 164 (Utah 1971) (the party was served by substitute service only and had no actual notice of the proceeding.)

The rest of the cases cited by Gilbert are inapposite to the issue before the Court. In Franklin Covery Client Sales v. Melvin, 2000 Ut. App. 110, 2 P.3d 451, the court held that an out of state resident that had traveled to Utah a least 10 times was subject to personal jurisdiction in Utah. In State Dept't of Soc. Servs. v. Vigil, 784 P.2d 1130 (Utah 1989) the appellate court held that the lower Court lacked subject matter jurisdiction over the case. In Gillette v. Price, 135 P.3d 831 (Utah 2006) the court held that filing a motion to reconsider does not toll the time for appeal. In Richards v. Jefferson County, 517 U. S. 793, 116 S.Ct. 1761 1966, the court held the doctrine of res judicata does not apply to individuals that are not a party to a prior lawsuit. In Meyers v. Interwest Corp., 632 P.2d 879 (Utah 1981), the court held that service was not defective because the summons stated 20 days instead of 30 days to respond. None of these cases relate to the issue before the Court.

Gilbert has failed to cite a single case in which anyone that has appeared in a proceeding and defended himself was later able to successfully claim that the Court lacked in personam jurisdiction. In this case, Gilbert voluntarily appeared and submitted himself to the Court. Mr. Gilbert submitted himself to the jurisdiction of the Court, and made no argument that the Court lacked in personam jurisdiction. The trial court questioned Mr. Gilbert as to how he could take money in violation of Court Order:

And if you knew the funds were coming from the bank account that was a court order, I can't say you were blameless. You knew the source of the funds. You knew who was paying you and you took the money. Right? You knew there was a court order not to do that.

R. 1336, pg 56

You can't fight your lawsuit on their dime.

Id. at 57.

There lies the inherent problem with everything you're doing. The court has ordered [the funds] returned. Therein lies the problem.

Id.

Mr. Gilbert argued that he was entitled to be paid for the work he did - "I have overhead. I have staff." Id. at 87. The court rejected this argument - "I'm not getting into that. The point of it is you were ordered [not to get at the money in the accounts] after May 3rd." Id. at 87.

In Robinson & Wells, P.C. V. Warren, 669 p.2d 944 (Utah 1984), the court stated that a general appearance alone is sufficient to give the court personal jurisdiction:

By appearing generally... in the hearing on plaintiff's motion to confirm the award, defendant submitted to the jurisdiction of the district court and cannot contest that jurisdiction as the basis for a new trial.

Id. at 849.

Similarly in Barlow v. Cappo, 821 p.2d 465 (Utah App, 1991) the Court held that defendants' appearance before the court on a motion for "forum non convenience" was a "general appearance" and defendants submitted to the jurisdiction of the Court. In this case, Gilbert submitted to in personam jurisdiction at the March 18, 2008 hearing.

Even so, Gilbert long ago waived this issue. Gilbert did not raise the issue at the March 18, 2008 hearing. Gilbert waited 2 ½ years to raise the issue for the first time. The issue was long ago waived. See, e.g. Rule 12(h) Utah Rules and Civil Procedure (if an objection to personal jurisdiction is not timely raised it is waived), Bernard v. Wasserman, 855 p.2d 243 (Utah 1993), finding that the defendant waived any defense of in personam jurisdiction where no objection was timely raised.

II. GILBERT WAS NOT DENIED DUE PROCESS

Gilbert's claim that he was denied Due Process is without merit. Gilbert claims that "he was never placed on proper notice that he was the subject of any actual or potential personal judgments to be entered against him by the district court." Appellee's Brief, pg 21-22. Gilbert clearly had notice of the Motion to Disgorge Funds because he received a copy thereof in the mail. He filed a Memorandum in opposition to that motion. He appeared at the March 18, 2011 hearing and argued his position. During this entire time he never claimed a lack of Due Process.

The case law cited by Gilbert is not applicable. In Hartloff v. Hartloff, 296 A.D.2d 849 (N.Y. App. Div. 2002), the court vacated a judgment against a nonparty that "had not been served with process notifying them of any claim for money damages against them, and had not been afforded the opportunity to defend on the merits." In this case, Gilbert was served with the Motion for Disgorgement of Funds (pursuant to Rule 6) and defended himself at the March 18, 2008 hearing.

The other two cases cited by Mr. Gilbert are also not applicable. Chen v. Stewart, 2004 UT 82, 100 p.3d 1177 416 (Utah 2005) involved a contempt proceedings against a party that violated a temporary restraining order. Brigham Young Univ. Tremco Consultants, Inc. 2005 UT 19, 110 p.3d 678 involved the application of the issue preclusion branch of res judicate neither case is applicable in this case. Gilbert has failed to cite a single case where an individual that had notice of a claim and appeared in Court and defended on the claim has been able to successfully argue that he was denied Due Process.

The minimum requirements of due process are "adequate notice and an opportunity to be heard in a meaningful way." Dairy Product Services, Inc. v. City of Wellsville, 13 p.3d 381

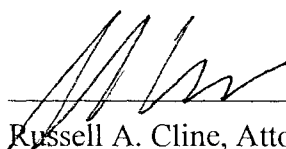
(Utah 2000). In this case, Mr. Gilbert had both. He received the Motion to Disgorge Funds which gave him notice of the claims against him. He also appeared at the March 18, 2008 hearing and had a meaningful opportunity to be heard.

Having appeared in Court and argued his case, and having failed to raise any Due Process issue, Gilbert has also waived his right to raise a Due Process defense at this date. See e.g., Crookston v. Fire ins. Exchange, 817 p.2d 789 (Utah 1991) (failure to raise the Due Process argument at trial is waiver); City of Orem v. Lee, 846 p.2d 450 (Utah 11993) (failure to raise the Due Process argument at trial is waver.)

CONCLUSION

For the foregoing reasons, the June 18, 2008 Order and Judgment should not be vacated. UDSF should also be awarded attorney's fees on appeal. UDSF was awarded attorney's fees below. On appeal Gilbert has not challenged that award of attorney's fees. As the prevailing party on appeal, UDSF should also be awarded attorney's fees on appeal.

Dated this 26 day of October, 2011.



Russell A. Cline, Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I mailed a true and correct copy of the foregoing, postage pre-paid on this 26 day of October, 2011 to:

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