CASE No. S122923

IN THE SUPREME COURT OF THE STATE OF CALIFORNIA

BILL LOCKYER, Attorney General of the State of California

Petitioner,

CITY AND COUNTY OF SAN FRANCISCO, GAVIN NEWSOM, in his capacity as Mayor of the City and County of San Francisco; MABLE S. TENG, in her official capacity as Assessor-Recorder of the City and County of San Francisco; and NANCY ALFARO, in her official capacity as the San Francisco County Clerk,

Respondents.

AMICI CURIAE DR. ANTHONY BERNAN, ANDREW NEUGEBAUER, STEPHANIE O'BRIEN, JANET LEVY, DR. GREGORY CLINTON, GREGORY MORRIS, JOSEPH FALKNER, ARTHUR HEALEY, KRISTIN ANDERSON, MICHELE BETEGGA, DERRICK ANDERSON, AND WAYNE EDFORS II'S REQUEST FOR LEAVE TO FILE AMICI CURIAE BRIEF AND PROPOSED AMICI CURIAE BRIEF SUPPORTING RESPONDENT'S IMPLICIT POWER TO ISSUE MARRIAGE LICENSES PURSUANT TO FAMILY CODE AND HIS REFUSALTO ENFORCE THE LANGUAGE OF FAMILY CODE SECTIONS 300, 308.5 AS THEY RELATE TO SAME-SEX COUPLES.

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APPLICATION FOR LEAVE TO FILE AMICUS CURIAE BRIEF

TO THE HONORABLE RONALD GEORGE, CHIEF JUSTICE:

This application for leave to file an Amicus Curiae brief is made on behalf of Dr. Anthony Bernan, Andrew Neugebauer, Stephanie O'Brien, Janet Levy, Dr. Gregory Clinton, Gregory Morris, Joseph Falkner, Arthur Healey, Kristin Anderson, Michele Bettega, Derrik Anderson, and Wayne Edfors II. The Proposed Amici Curiae are same-sex couples whose marriages were officiated in San Francisco. As such, their interests are fundamentally tied to the outcome of this action.

Applicant's proposed brief, in summary, sets forth arguments resolving the issues raised by the return as to whether or not San Francisco Mayor Gavin Newsome had authority to issue marriage licenses in San Francisco to same-sex couples under the Family Code. It is clear that Respondents were not acting outside the scope of their authority to issue marriage licenses. The question becomes whether same-sex couples share protections as heterosexual couples under the Family Code and whether Mayor Newsome and the County Clerk have implicit powers to act consistent with the Family Code. Amici Curiae's brief addresses the Family Code, specifically Sections 300, 308.5 and 2251 and how 2251 is gender neutral and does not prevent either a man or a woman from seeking division of the couple's property from a union, so long as "either party or both parties believed in good faith that the marriage was valid, and that the marriage is "void or voidable." Amici Curiae sets forth justification as to why Respondents are justified in issuing marriage licenses to same-sex couples because the distinction drawn by the Petitioners between same-sex couples and heterosexual couples, such that homosexual couples

cannot be spouses (and putative spouses) is inconsistent with the Equal Protection Clauses of the California and United States Constitution.

Respectfully submitted:

Dated:

LAW OFFICES OF WAUKEEN McCOY

WAUKEEN Q. McCOY, ESQ.

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ISSUES PRESENTED RELATED TO AMICI CURIAE

This case presents the following issues for review relating to this request for relief by Petitioners:

1. Whether Respondents have implicit authority to issue marriage licenses to same-sex couples under the California Family Code.
2. Whether the distinction drawn between homosexual and heterosexual couples, such that same-sex couples cannot be "spouses," violates the Equal Protection clauses of the California and United States Constitutions.
3. Whether the definition of "spouse" under Section 300 of the California Family Code is applicable to Section 2251, as it relates to same sex couples.

The primary issue presented in this Petition, and by Respondents refusal to abide by Family Code Sections 300 and 308.5 as it relates to same-sex couples is whether men and women should be treated equally under California Family Code. The simple answer is that Respondents have the implicit authority under Family Code Section 2251 to deem same-sex couples, similarly situated as Amici Curiae, as “spouses”. Section 2251 alone is dispositive of the issues in this case as it relates to Amici Curiaes and to other individuals similarly situated.

Amici Curiae have fortified themselves with the protections of a marriage. Petitioners seek to strip Amici Curiae of these protections by challenging the validity of the issuance of Amici Curiae’s marriage licenses. Petitioners argue that California prohibits marriage between persons of the same gender.

However, this Court must recognize a same-sex putative marriage pursuant to the Family Code since there is basis for such conclusion. If not, the determination to void the marriage, as would be for Amici Curiae if the Court determines that the issuance were a violation of section 300, would

clearly violate the Equal Protection clauses of the California and United States Constitutions.

Same-sex couples throughout the State of California have entered into marital agreements. The Mayor of San Francisco and the County Clerk of San Francisco have wed hundreds of same-sex couples, with ceremonies broadcast nationwide. Even though these marital agreements can be based on greater devotion, love, commitment, and sharing than their counterpart heterosexual relationships, the Petitioners argue that this State should not provide the important protections of the Family Code, including Section 2251, to same-sex couples. This Court should recognize the reality of the very strong family bonds that are being created, and not deny protections provided these relationships simply because of sexual orientation. The Courts have been at the forefront in prohibiting discrimination due to sexual orientation in employment and business, and should prohibit discrimination in the County Clerk's office in San Francisco or any other city in this great State.

All the Amici Curiae were married on February 13, and 14, 2004 and were issued Public Marriage Licenses from the City and County of San Francisco. Heterosexual and homosexual couples throughout the State and beyond have entered into such relationships of interdependence. There are several countries and provinces that recognize same sex marriage[1] and this recognition has not broken down the traditional values of families or had any other adverse affect on citizens. Thus, as an example, to deny amici curiae Dr. Clinton with the same protections provided a woman in his same situation is to deny him equal protection of the law.

[1] On March 19, 2004, the Quebec Court of Appeal upheld the Lemelin decision and struck down the delay so equal marriage is the law of Quebec. This means that the first part (section 1,1) of the Modernization Act (which defines marriage between a man and woman) was struck down with the Harmonization Act (section 5,1), which defined marriage in Quebec as between a man and a woman. The 5 Judge court ruled unanimously that the Ontario decision (Halpern) applied to all provinces.

STATEMENT OF THE CASE

Procedural History

Petitioners filed a Verified Petition on February 13, 2004 for a Writ of Mandate and Immediate Stay, and Complaint For Injunctive and Declaratory Relief against the City and County of San Francisco, the Mayor and County Clerk. Amici Curiae have been at the forefront of these issues to ensure that the Family Code is read to include all persons and not just those who have a heterosexual sexual orientation and was allowed to amici curiae status in the San Francisco County Superior Court on the issues presented to his Court by the Honorable James Warren.

Summary of the Material Facts

Amici Curiae Dr. Anthony Bernan, Andrew Neugebauer, Stephanie O'Brien, Janet Levy, Gregory Clinton, and Gregory Morris are homosexual men and women who decided to get married on February 13, 2004 and February 14, 2004. At a City Hall ceremony as well as a prior private ceremony, amici curiae promised to love, cherish, support one another, and maintain a monogamous sexual relationship for the rest of their lives.

Believing in the validity of their marriage, amici curiae commingled all of their funds and shared their expenses and assets equally. The couples further agreed that each would be the primary breadwinner and that each would maintain the marital home. Shortly after their marriage, each amici curiae reinforced his or her promises to be the primary breadwinner and support each other in addition to maintaining the home.

ARGUMENT

I. RESPONDENTS ARE NOT ACTING OUTSIDE THE SCOPE OF THEIR AUTHORITY IN ISSUING MARRIAGE LICENSES BECAUSE IT IS A VIOLATION OF THE EQUAL PROTECTION CLAUSES OF THE CALIFORNIA AND UNITED STATES CONSTITUTIONS TO EXCLUDE SAME-SEX COUPLES FROM THE DEFINITION OF "SPOUSE" FOR THE PURPOSES OF FAMILY CODE; THE COUNTY CLERK HAS ALWAYS HAD THE AUTHORITY TO ISSUE MARRIAGE LICENSES.

The San Francisco County Clerk has always had the authority to issue marriage licenses in the City and County of San Francisco and therefore was not acting outside the scope of her authority in issuing marriage licenses to residences of the City and County of San Francisco and others who decided to be married.

Further, California Family Code Section 2251 is a statute that is applicable and resolves the issue of authority of the Clerk and the Mayor related to same-sex couples who hold themselves out as married as amici curiae. California Family Code Section 2251 provides for division of property acquired during a union of marriage, so long as "either party or both parties believed in good faith that the marriage was valid;" and that the marriage is "void or voidable." (emphasis added.) Section 2251 is gender-neutral. It does not prevent either a man or a woman from seeking division of the couple's property. Implicit in this statute is the ability for the Mayor of San Francisco and the County Clerk to issue licenses consistent with the statutory provision and for the Court to recognize the relationships of same-sex married couples.

The California Constitution provides that "a person may not be deprived of life, liberty, or property without the due process of law or denied

equal protection of the laws." California State Constitution, Article I, Section 7. Similarly, the Fourteenth Amendment to the United States Constitution provides that no state shall deny any person within its jurisdiction the equal protection of its laws.

California courts have restated the concept of equal protection under California law as the concept that governmental and private entities, if operating under the color of law, should treat similarly situated people the same. *See Duffy v. California State Personnel Board*, 232 Cal.App.3d 1 (1991, 3rd Dist.); *Educational & Recreational Services v. Pasadena Unified School Dist.*, 65 Cal.App.3d 775 (1977, 2nd Dist.).

Normally in an equal protection case, the government must justify its actions of treating similarly situated people differently, based upon the classification used and the appropriate level of scrutiny. The California Supreme Court has held that persons who have suffered discrimination based upon their gender are a "suspect class" and are thus entitled to "heightened scrutiny" to determine whether the discrimination amounted to a violation of that person's rights under the equal protection clause of the California Constitution. *See Sail'er Inn v. Kirby*, 5 Cal.3d 1 (1971); *Serrano v. Priest*, 18 Cal.3d 728 (1976); *Hinman v. Department of Personnel Administration*, 167 Cal.App.3d 516 (1985, 3rd Dist.). For a gender-based classification to withstand equal protection scrutiny, it must be established " 'at least that the [challenged] classification serves "important governmental objectives and that the discriminatory means employed" are "substantially related to the achievement of those objectives." ' " *United States v. Virginia,* 518 U.S. 515, 533, 116 S.Ct. 2264, 135 L.Ed.2d 735 1996) (quoting *Mississippi Univ. for Women v. Hogan,* 458 U.S. 718, 724, 102 S.Ct. 3331, 73 L.Ed.2d 1090 (1982), in turn quoting *Wengler v. Druggists Mut. Ins. Co.,* 446 U.S. 142, 150, 100

S.Ct. 1540, 64 L.Ed.2d 107 (1980)). If a fundamental right is involved – Marriage – the Court applies Strict Scutiny. *D'Amico v. Board of Medical Examiners* (1974) 11 Cal.3d 1, 17.

In cases relating to discrimination based upon sexual orientation, the California Supreme Court has held that the equal protection clause of the California Constitution prohibits invidious or arbitrary discrimination on the basis of sexual orientation. *Gay Law Students Association v. Pacific Tel. & Tel. Co.*, 24 Cal.3d 458 (1979).

The California Court of Appeal for the Third District determined in a case regarding denial of the benefits of a state employees' dental plan for the employee's homosexual partner, that the classification used in determining benefits was whether the couple was married, which under equal protection analysis need only be rationally related to some legitimate governmental purpose. *Hinman v. Department of Personnel Administration*, 167 Cal.App.3d 516 (1985). The Court of Appeal then found that basing eligibility for benefits upon whether a couple was married was rationally related to the government's legitimate interest in promoting marriage. *Id.*

But this is not a case about whether the legislature has met its burden under a strict scrutiny or rational basis analysis. The legislature has <u>not</u> banned homosexual putative marriage. This Court should recognize that same-sex putative marriage under Section 2251 is gender neutral, which was specifically promulgated to deal with "void or voidable," "good faith" marriages; certainly if the court takes literally the language of section 300 and applies it to the authority vested in the mayor of San Francisco to issue marriage licenses to same sex couples.

In this case, Amici Curiae believe in good faith that they were married to their same-sex spouses and that Mayor Newsom and the County Clerk were well within their authority to sanction their commitment.

If this Court agrees with the Petitioners, and determines that the Mayor had no authority, it is effectively denying same-sex couples and others similarly situated the opportunity to fully present the legal theory that marriage is a contractual right to be entered into by any "person" and not just that between man and a woman. It is understood that "marriage is a civil contract which not only creates reciprocal rights and obligations as between contracting parties, but which also affects their status." *In re Axelrod's Estate*, (1944) 147 P.2d 1; 23 C.2d 239. Indeed, Amici Curiae argue that they must be given equal protection of the laws of the State of California in order to freely enter into the contractual rights and obligations of marriage. Furthermore, the Mayor certainly has authority to prevent continued discrimination against a particular group of individuals. It is well established that Section 2251 of the Family Code was promulgated to catch couples who fall outside the literal requirements of section 300.

Amici Curiae should not be treated like characters straight from Kafka, languishing in a world where they are stripped of all legal personality. Instead, in the State of California, Amici Curiae each of them, is a "person" who may freely enter into any legal contract without limitation. Moreover, Amici Curiae also posses the ability to enforce those contracts in a court of law. However, if this Court gives the Petitioner the relief sought, then amici curiae, and others similarly situated, will be stripped of his legal right to enter into and enforce a contract of marriage.

Dr. Anthony Bernan, for example, would be denied equal protection under section 2251 of the California Family Code for the sole reason that he is

a man and not a woman, as a woman similarly situated would be considered Mr. Neugbauer's putative spouse. This is certainly not what the legislature intended. Moreover, Amici Curiae Stephanie O'Brien would be denied equal protection under section 2251 of the California Family Code for the sole reason that she is a woman and not a man, as a man similarly situated would be considered Ms. Levy's putative spouse.

But, even if Section 300 is upheld, the issuance of marriage licenses to same-sex couples by the Respondents should still be valid as putative spouse relationships because Section 2251 does not limit putative spouses to heterosexual couples only. Amici Curiae have good faith beliefs that they are married, they should be given putative status.

II. RESPONDENTS ARE JUSTIFIED IN ISSUING MARRIAGE LICENCES TO SAME-SEX COUPLES BECAUES THE DISTINCTION DRAWN BY THE PETITIONERS BETWEEN SAME-SEX COUPLES AND HETEROSEXUAL COUPLES, SUCH THAT HOMOSEXUAL COUPLES CANNOT BE "SPOUSES" OR "PUTATIVE SPOUSES," VIOLATES THE EQUAL PROTECTION CLAUSES OF THE CALIFORNIA AND UNITED STATES CONSTITUTIONS.

A. The ruling of *In re Marriage of Vryonis* is distinguishable and thus inapplicable to this case.

The Petitioners may rely, in part, upon *In re Marriage of Vryonis*, 202 Cal.App.3d 712 (1988), in making their argument regarding the issuance of a Writ. The Court of Appeal in *Vryonis* held that if the trial court based its putative marriage finding on the woman's belief that she had celebrated a valid marriage under the doctrine of her sect, the ruling was error because the required good faith belief is in the existence of a lawful California marriage. The *Vryonis* case is distinguishable from this Case and is therefore inapplicable.

The female plaintiff in *Vryonis* was a member of a Moslem sect, and visiting professor at the Center for Near Eastern Studies at U.C.L.A. The plaintiff and defendant, a male, dated in February and March of 1982, but the plaintiff repeatedly stated that she could not date without marriage or a commitment because of her strict religious upbringing. The defendant responded he could not marry the plaintiff as he did not know her and that he was a "free man." *Id.* at 715. Nevertheless, the couple, in a private ceremony at Plaintiff's apartment, got married. The relationship lasted for two years. *Id.* In that time, the couple kept their relationship a secret, did not inform family or friends, never held themselves out as married, kept their assets separate, the defendant continued to date other women, the couple did not cohabitate, and frequently the Plaintiff asked the Defendant to solemnize their marriage in a mosque or other religious setting, but the Defendant refused. *Id.* In fact, the couple spent a total to 22 nights together in 1982, only a few in 1983, and none in 1984, at which time the defendant married a different woman.

Vryonis was essentially a sham marriage. The union in the present case, on the other hand, have lasted for several years and are not, nor ever were, secret. The couples have pooled their assets and income together, established joint fiscal obligations in the form of bank accounts and credit cards, have purchased property together, and are cohabitating. The issuance of a marriage license by Mayor Newsom validates the existence of their union.

B. Amici Curiae are homosexual and thus will be denied Equal Protection of the law under the California and United States Constitutions if their marriage licenses are held to be invalid. Public Policy Demands That Amici Curiae Be Afforded Equal Protection Of The Laws.

Public policy demands that this State finally confirm and/or recognize marriages between a couple of the same gender in order to afford all its citizens equal protection of the laws. Same-sex couples seeking to form a lasting, legal commitment with all the rights and obligations of marriage are similarly situated to heterosexual couples seeking to make the same commitment. To deny same-sex couples the right to make such a commitment is to deny their humanity.

III. IT IS UNNECESSARY TO DETERMINE WHETHER OR NOT MAYOR NEWSOM HAD THE AUTHORITY TO ISSUE MARRIAGE LICENSES UNDER ARTICLE III, SECTION 3.5 OF THE CALIFORNIA CONSTITUTION, SINCE FAMILY CODE SECTION 2251 GIVES THE COURT AUTHORITY AND THE MAYOR IMPLICIT AUTHORITY TO GRANT THE DESIGNATION OF "PUTATIVE SPOUSE" TO ALL WHO ERRONEOUSLY YET IN GOOD FAITH BELIEVE THEMSELVES LEGALLY MARRIED.

It is really unnecessary to determine whether or not Mayor Newsome had the authority to issue marriage licenses under Article III, section 3.5 of the California Constitution, since Family Code Section 2251 grants authority to the Court and implicit authority to the Mayor to designate individuals as putative spouses, if they believe in good faith that they themselves are married.

Amici Curiae should not be treated as less than human. In the past, American society has denied African-American slaves the right to marry. A husband could be sold to one plantation and a wife to another; their relationships were considered unimportant because they were considered to be less than human. Slaves were denied the legal franchise of marriage because the differences perceived in this vulnerable minority allowed society to convince itself that blacks were unworthy of legal protections. Later, after

slavery was abolished, laws were created to prevent African-Americans from marrying whites. Here in California we prevented Asians from marrying whites, in order to bolster the claim that Asians were somehow less than human. Although the circumstances in each case different, the rights that should have been afforded are the same. The doctrine of separate but equal should be totally abolished.

Today, we look back with appropriate horror at these laws, but we must remember that they are not very far removed from our recent history. The last law prohibiting interracial marriage was not struck from the books until 1969. It is important to remember that those who opposed interracial marriage did so with the same degree of moral conviction as those who now condemn same-sex marriage as a vile crime against nature. This Court is thoughtful and fair-minded and sees the fairness and rightness of respecting family relationships and committed, caring unions. To avoid injustice, this Court should deny the Petition and deem Mayor Newsom's authority to issue marriage licenses implicit within Family Code Section 2251.

A. California Family Code Section 2251 Must Be Interpreted To Include All Citizens, Homosexuals And Heterosexuals Alike, As Section 2251 does not distinguish on the basis of sexual orientation.

California Family Code Section 2251 must be interpreted to include all individuals as each citizen is entitled to equal protection of the laws of the State of California. This concept is embedded in our State Constitution.

Family Code Section 2251, although coincides, is independent of any other statute in the Family Code and it is neutral as it does not distinguish between citizens of different sexual orientations. It is clear that if the legislature wanted to make that distinction, they would have done so. Further,

since no distinction was made and since the state constitution provides that every citizen is entitled to equal protection of the laws, Section 2251 must be held to apply to all citizens of the State, whether homosexual or heterosexual. Specifically, Section 2251 is operable here.

If Family Code Section 2251 did not apply to Amici Curiae, it would certainly be in direct conflict with the State Constitution, which provides that "a person may not be deprived of life, liberty, or property without the due process of law or denied equal protection of the laws." Cal. State Const., Article I, Section 7.

It has been pointed out in Petitioner's brief and recognized that under California Family Code Section 300, 308.5 marriage is a union between a man and a woman. As explained, however, 2251 is an independent statute and cannot be read in conjunction with Section 300 as there would have been no need for the legislature to promulgate section 2251 if that were the case. It is clear that this section was promulgated to catch any couple not falling within section 300 and provides Mayor Newsom with implicit authority to issue marriage licenses.

Even more compelling is the notion that Section 7 of the California State Constitution, Article I, refers to a person and does not distinguish between gender, color, or sexual orientation. Thus, all citizens of the State of California enjoy the same protection and privileges. Clearly, this is also the case under the 14th Amendment to the United States Constitution.

Further, in the event that there is a conflict with portions of the California Family Code and the State Constitution, it is hornbook law that the Constitution shall prevail. Thus, as a matter of law, Amici Curiae are protected by the Equal Protection Clause of the California State Constitution and a Writ of Mandamus on the punitive quality of their marriage is improper

as Amici Curiae have presented a legal theory upon which to deny Petitioner's request.

Moreover, while the State Legislature has not modified sections 300, 301, 308.5, or 355 to include same sex couples, it has not modified the State Constitution to exclude certain persons from its benefits and disabilities either. In contrast, all citizens of this state are entitled to enjoy a life free from state-sponsored prejudice.

In sum, since Family Code Section 300 is closely connected with the validity of Section 2251 definition of punitive spouse, Mayor Newsom had implicit authority to recognize relationships and this court has the authority to deem Amici Curiae, spouses for life.

IV. REGARDLESS OF THE CONSITUTIONALITY OF FAMILY CODE SECTION 300, RESPONDENTS' ISSUANCE OF MARRIAGE LICENCES TO SAME-SEX COUPLES CONSTITUTES A PUTATIVE RELATIONSHIP BECAUSE THE DEFINITION OF "SPOUSE" UNDER SECTION 300 IS INAPPLICABLE TO SECTION 2251.

Petitioners have relied on Section 300 of the California Family Code to determine the definition of "spouse" under California law. California Family Code Section 300 provides:

> Marriage is a personal relation arising out of a civil contract between a man and a woman, to which the consent of the parties capable of making that contract is necessary. Consent alone does not constitute marriage. Consent must be followed by the issuance of a license and solemnization as authorized by this division, except as provided by Section 425 and Part 4 (commencing with Section 500). California Family Code Section 300.

California Family Code Section 2251 does not include its own definition of "spouse." Rather, California Family Code Section 2251 provides in pertinent part that:

> (a) If a determination is made that a marriage is void or voidable and the court finds that either party or both parties believed in good faith that the marriage was valid, the court shall:
>
> (1) Declare the party or parties to have the status of a putative spouse.
>
> California Family Code Section 2251 (Supp. 1997)

Therefore, since Section 2251 stands independent of Family Code Section 300 definition of marriage, Section 2251 is applicable and may apply to same-sex couples. As a result, even if Family Code 300 is deemed unconstitutional and Respondents are not justified in issuing marriage license to same-sex couples, Section 2251 will still apply to these couples and they should be considered to carry on a putative spousal relationship.

CONCLUSION

Amici Curiae urge this Court to uphold the marriage license issued to same-sex couples by respondents by interpreting Section 2251 of the California Family Code to apply to all citizens of this State. To do otherwise would be to deny its citizens those rights guaranteed by the Equal Protection Clauses of the California and United States Constitutions.

Further, this Court should deny Petitioner's Petition as California Family Code Section 2251 applies to men as well as women and in order to offer a defined set of judicial and legislative rules to the ever growing population of same-sex couples who marry and later divorce.

Indeed, the consequences of a committed relationship for same-sex couples who have children, significant assets and later commingle them, is substantially more grave and inequitable than it is for heterosexual couples.

This is so because, unlike heterosexual couples that may establish putative spouse status, the courts cannot intervene and offer an equitable division of property to same-sex couples who end a long-term relationship.

Notwithstanding the significant legal argument that the California legislature has not excluded same-sex couples from the definition of "spouse" under Family Code Section 2251, if the legislature had excluded same-sex couples from either Section 300 or Section 2251, such exclusion nonetheless does not further the legislative objective of providing an equitable resolution of economic disputes that arise when intimate relations between individuals who have been financially interdependent break down. Based on the authorities cited herein, Amici Curiae urge the court to conclude that Newsome was well within his implicit power to issue marriage licenses; otherwise he would have not been following the law that he was elected to uphold.

Dated: March 25, 2004

Respectfully submitted,

LAW OFFICES OF WAUKEEN Q. McCOY

BY_____

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AMICI CURIAE Dr. Anthony Bernan, Andrew Neugebauer, Stephanie O'Brien, Janet Levy, Dr. Gregory Clinton, Gregory Morris, Joseph Falkner, Arthur Healey, Kristen Anderson, Michele Bettega, Derrik Anderson, and Wayne Edfors II.