
Washington Supreme Court

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Supreme Court Docket No. 102627-7

Division II Docket No. 56949-3-II

Wahkiakum County Superior Court No. 21-1-00014-35

STATE OF WASHINGTON, *Plaintiff-Respondent*

v.

JENNIFER RICHARDS, *Defendant-Appellant*

RESPONDENT'S ARGUMENT

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STATUTES AND RULES

I. Identity of Respondent

Respondent/cross-appellant is the County of Wahkiakum.

II. Court of Appeals Decision

The Court of Appeals decision being appealed is cause #56949-3-II.

III. Issues Presented for Review

1. The County **opposes** review of Ms. Richards's issue A because the Court of Appeals correctly followed this court's precedent in determining that the county code did not conflict with the general law of the state, and because the issue does not meet the standards for this court's acceptance of review pursuant to RAP 13.4(b).

2. The County **opposes** review of Ms. Richards's issue B because the courts below properly found that the enactments applicable herein were capable of construction to effectuate legislative intent and therefore the application of the rule of lenity was unnecessary, and because the issue does not meet the standards for this court's acceptance of review pursuant to RAP 13.4(b).
3. The County **requests** review of the decision of the Court of Appeals that a sentencing municipal or district court does not have the power to sentence a misdemeanant to conditions that approximately duplicate what could be achieved through the application of other statutes with other burdens of proof and procedural requirements.

IV. Statement of the Case

The facts herein are stipulated; the county reproduces them verbatim from the stipulation document.

1. At all times relevant to these proceedings, defendant [and current appellant] Jennifer Richards resided in Wahkiakum County at 2 Olive Rd., Cathlamet, Apt. #2; and owned a dog named Thor.
2. The dog Thor was declared a potentially dangerous dog by letter of the Wahkiakum County Sheriff's Office dated June 7, 2018, and served upon the defendant on June 18, 2018.
3. The defendant never appealed Thor's designation as a potentially dangerous dog.

4. On April 30, 2019, Thor was declared a dangerous dog by letter of the Wahkiakum County Sheriff's Office dated April 30, 2019, and served upon the defendant on March 2, 2019.
5. The defendant timely appealed the designation of Thor as a dangerous dog.
6. At a hearing on July 17, 2019, in Wahkiakum County District Court, the designation of Thor as a dangerous dog was upheld. This was done in cause #CV-2019-1025.
7. The legal ground upon which Thor was determined to be dangerous was that Thor met the definition of "dangerous dog," in the Revised Code of Wahkiakum County at 16.08.010, because, having previously been found to be potentially dangerous and the owner having received notice of the finding,

Thor again aggressively bit and endangered the safety of a domestic animal.

8. No evidence was adduced at the July 17, 2019, hearing sufficient for a finding Thor met the definition of "dangerous dog" in any other way.
9. The defendant did not appeal the finding Thor was dangerous.
10. On September 12, 2020, in Wahkiakum County, the defendant permitted Thor to be outside a proper enclosure pursuant to RCWC 16.08. At that time, Thor was neither muzzled nor restrained by a substantial chain or leash; neither was Thor under the physical restraint of a responsible person.

These facts were the subject of a motion pursuant to State v. Knapstad, 107 Wn.2d 346, 729 P.2d 48 (1986); and

were then the basis of the record upon which Richards was convicted and sentenced on September 28, 2021. CP 1. The judgment and sentence imposed 364 days in jail, but provided, "Defendant shall not be required to go into custody if she provides written proof that the dog Thor has been surrendered to the Cowlitz Humane Society by 9/24/21 at 3:00 p.m." Id.

Ms. Richards appealed timely pursuant to RALJ, which upheld the conviction. She then appealed to the Court of Appeals, Div. II, which accepted discretionary review, upheld the county ordinance over her challenge of its constitutionality, and reversed the sentence on the grounds that the statutory authority of the sentencing court – RCW 3.66.067 (court "may place the defendant on probation for a period of no longer than two years and prescribe the conditions thereof") – did not extend so far as to require

the respondent to forfeit the dog Thor to the Humane Society. Now each side requests review of the adverse portion of Div. II's published opinion.

V. Argument Why Review Should Not Be Accepted

1. RAP 13.4(b)(1) or (2)

Richards make an argument headed by a citation to RAP 13.4(b)(2), regarding conflict with a decision of the Court of Appeals, but the only authority she cites is a case from this court: Seattle v. Winebrenner, 167 Wn.2d 451, 219 P.3d 686 (2009). The gist of the argument appears to be that because there are Court of Appeals (and Supreme Court) decisions regarding the rule of lenity, and the Court of Appeals did not agree that the rule applied, either or

both of RAP 13.4(b)(1) or (2) are automatically satisfied. But this does not appreciate the gravamen of RAP 13.4(b).

It is a trivial truth that if a lower court makes an incorrect decision about a rule of law that has previously been the subject of a decision of this court, that court has made an *erroneous* decision. That should not be conflated with the proposition that any incorrect decision about a rule that has been the subject of a decision of this court has *conflicted* with the court's previous decision. A court decides a case by applying a proposition of law to a set of facts. The art of most legal work is to determine whether a previous decision is similar enough in fact and law that it should govern the decision in the current case.

For instance, in Hoflin v. Ocean Shores, 121 Wn.2d 113, 847 P.2d 428 (1993), the state invoked RAP 13.4(b)(1) as

a ground for review of a decision regarding a matter of just cause for termination. Id., 121 Wn.2d at 125. The inquiry focused on, not just what the rule for just cause was, but whether decisions previously made were binding or distinguishable: e.g., whether the definition of "just cause" used in Danielson v. Seattle, 108 Wn.2d 788, 742 P.2d 717 (1987), was applicable to public-employment cases or only private employment. Hoflin, supra, 121 Wn.2d at 128. See also Buchsieb/Danard, Inc. v. Skagit Cty., 99 Wn.2d 577, 580, 663 P.2d 487, 489 (1983), in which this court granted review not because of a potential conflict with a *rule*, but one between *cases*. "In the present case we granted discretionary review for consideration of the Court of Appeals decision in light of Norco Constr., Inc. v. King Cy., supra. RAP 13.4(b)(1)." Buschseib/Danard,

supra, citing Norco Constr. v. King County, 97 Wn.2d 680, 649 P.2d 103 (1982).

Here, the court will find no conflict between the divisions regarding what the rule of lenity is. Nor has Ms. Richards shown the court a case on the rule of lenity that could be called controlling under the circumstances, except insofar as such case correctly states what the rule of lenity is. Nor is there any allegation that any lower court at any time in this case misstated the rule of lenity, much less applied an erroneous version of it.

Ms. Richards misapprehends the error RAP 13.4(b)(1) was designed to capture. If an application of the rule of lenity is erroneous and results in a constitutional injustice, or simply raises an issue of substantial public interest, this court certainly has the power to accept this case. But not

because this rule of procedure supports acceptance. This rule does not apply.

2. RAP 13.4(b)(3)

Ms. Richards alleges a "significant constitutional issue" pursuant to RAP 13.4(b)(3). She identifies that issue as pre-emption: the constitutional provision of Art. XI, §11, authorizing municipalities police power but only insofar as their regulations do not conflict with the general law of the state. Brief, 19. The citation identifies an issue, but Ms. Richards struggles to establish that issue's *significance* in light of the fact that the court addressed identical issues a quarter century ago in Rabon v. City of Seattle, 135 Wn.2d 278, 957 P.2d 621 (1998). Every court down the line, from the district court, through the superior court, to the Court

of Appeals, has found this court's ruling in Rabon controlling.

Ms. Richards does not repudiate Rabon, but attempts to distinguish it. She notes that the issue in the Rabon case had to do with dogs that had been declared "vicious" under the Seattle Municipal Code, while the word "vicious" does not appear in statute or in the Wahkiakum County Code. Brief, 18. Citing Justice Sanders's dissent as though it were the opinion of the court, she asserts that the court was concerned with the difference between "viciousness" and "dangerousness" exclusively, and that the court determined that "viciousness" was, in fact, "dangerousness." Id., 19. She then describes the holding of the Rabon court as being absolutely dependent on the difference between these terms. Id. But this is inaccurate.

Ms. Richards omits the Rabon court's own description of what it was deciding and how. The Rabon court did not concern itself with the distinction between "viciousness" and "dangerousness." It simply determined that there was no type of dog that a municipality was preempted from regulating.

The Rabon court ruled that potentially dangerous dogs shall be regulated only by local law, and "both local and state law may govern dangerous dogs." Rabon, 135 Wn.2d at 290 (internal quotation marks omitted). Thus, local law may govern all kinds of dog. And this scheme meant one thing to the Rabon court – the same thing it should mean here – that no conflict between state and local law governing dogs can exist, so long as local law does not

permit what state law prohibits. The Rabon court went on to note:

> Nothing in the statutes *clearly* indicates legislative intent that state law preempts. Absent any such clear indication, the presumption that an ordinance is constitutional, along with the rule that courts will not interpret a statute to deprive a municipality of the power to legislate on subjects within CONST. art. XI, §11 [police power], compels our holding that state law does not preempt local law.

Rabon, 135 Wn.2d at 291, citing State ex rel. Schillberg v. Everett Dist. Justice Court, 92 Wn.2d 106, 594 P.2d 448 (1979) (emphasis in original).

In her petition, Ms. Richards argues that changes in the law since this court decided Rabon argue for the reexamination of the case. E.g., Petition, 23. But this position is undercut by her simultaneous admission that the changes were intended to "codify" Rabon. Petition, 24.

Ms. Richards's contention (Petition, 19, emphasis in original) that "the County's definition of dangerous in no way resembles or mirrors 'dangerous' under State law" is as irrelevant as it is erroneous. It is not just that the Wahkiakum definition of dangerous dog quotes RCW 16.08.070(2) practically verbatim and then adds a single phrase – "or domestic animals." It is not the same, but it in *many* ways "resembles or mirrors" the definition of "dangerous" in state law. But the real issue is that the Rabon court held that there is no conflict even when the definitions of "dangerous" in state and municipal code do *not* "mirror" each other. The Rabon court particularly addresses the very point at issue here, ruling that "in exercise of its police power, a municipality may wish to provide further protection from dangerous or vicious animals." Rabon, 35 Wn.2d at 628.

The constitutional issues in this case may have been "significant" for the purposes of RAP 13.4(b)(3) once upon a time, but the Rabon court settled them. Ms. Richards has given the court no reason to revisit or distinguish the holding, which is in line with traditional methods of conflict analysis in use in 1998 and in the present day.

3. RAP 13.4(b)(4)

The extent of the public interest in this issue is perhaps best expressed by the information Ms. Richards brings to us in her brief at 27-28 describing her view of it. She notes, without adding specifics of any sort, that "dog-related crimes constitute a not insubstantial portion of the average criminal court docket." Id. "Not insubstantial" says nothing about what portion of the average criminal

court docket dog-related crimes are. And "not insubstantial" means "having substance," which basically means Ms. Richards is saying dog-related crimes exist. No vaguer claim could be made. To drill down on the amount of legal work dog-related crimes involve, Ms. Richards points to a single appellate case that involved dogs: City of Seattle v. Norman, 192 Wn.App. 1041 (2016), an unpublished case from seven years ago. The only other metric presented is a five-year-old study reflecting that 26.8% of Washingtonians owned dogs back then. Brief, 28 (where the respondent confusingly expresses the figure as 42.8% of 62.7% of Washingtonians). If that is a large number of dogs, then the number of appeals involving this kind of issue that Ms. Richards could point to – two – would appear to be disproportionately small. The dog-related criminal justice system seems to be sailing on

course without this court's needing to put its hand on the rudder.

Compare with State v. Watson, 155 Wn.2d 574, 577, 122 P.3d 903, 904 (2005), in which this court ruled that an issue of "substantial public interest" has been raised when the issue "has the potential to affect every sentencing proceeding in Pierce County after November 26, 2001, where a DOSA sentence was or is at issue." See also In re Marriage of Ortiz, 108 Wn.2d 643, 740 P.2d 843 (1987), in which this court took up issues regarding the application of a recent decision it had made regarding child support awards – an inarguably massive source of litigation.

The County is willing to concede that people like dogs, but that alone does not mean that a case involving dogs must be attended to. Certainly, the petitioner has not established

that people like dogs more now than they did when Rabon was decided. Furthermore, the system of animal regulation that the petitioner takes pains to describe as complicated, onerous, and ubiquitous, has in fact yielded relatively little litigation, and no proven public concern regarding any of the flaws the petitioner alleges. The County suggests that the Rabon case has answered all necessary questions, that the current case shows that the Rabon court properly instructed the Court of Appeals and lower courts on the law, and that no further instruction is required.

VI. **Cross-Appeal**

Based on RAP 13.4(d), the County "wants to seek review of an issue not raised in the petition for review."

VII. Issue Presented for Review

1. The Court of Appeals erred in ruling that the district court exceeded its sentencing authority by making the forfeiture of the offending animal to the Humane Society a condition of her suspended sentence.

VIII. Argument Why Review Should Be Accepted

RAP 13.4(b)(1): Conflict with Supreme Court

The Court of Appeals held that the District Court exceeded its sentencing authority by ordering, as a condition of Ms. Richards's sentence, that she hand the dangerous dog Thor over to the Humane Society. The court cited to a few cases to back up uncontroversial rules such as that courts abuse discretion when exceeding statutory authority. But the

only analogous authority on point cited by the Court of Appeals was State v. Deskins, 180 Wn.2d 68, 322 P.3d 780, (2014). In Deskins, the trial court ordered a condition that the defendant have no animals whatever during the period of her suspended sentence. Deskins, 180 Wn.2d at 76. Deskins argued that the statutory scheme requiring that she be banned from possessing "any similar animals" precluded the court's prohibition of possession of "any animals." Deskins, 180 Wn.2d at 79. The Supreme Court rejected the argument, noting that it "confuse[s] what a trial court *must do* with what it *may do*. The portion of former RCW 16.52.200(3) that deals with probation sets a floor for what a trial court must do when it orders forfeiture—it does not set the ceiling for the entire sentence. It ensures that trial courts order a prohibition on

ownership in certain cases but does not prevent them from ordering it in others." Id (emphasis in original).

The County cited Deskins as an example of what a municipal court is permitted to do under the sentencing authority granted by RCW 3.66.067 (under which the court "may place the defendant on probation for a period of no longer than two years and prescribe the conditions thereof"). The County's point was that the Deskins court permitted the magistrate to ban the possession of all animals even though statute required it to impose a similar, but lesser, restriction. The Deskins court approved a greater restriction than was imposed in the instant case, for the Deskins trial court's sentence required the defendant to have no animals whatever, while this trial court's

sentence permitted Ms. Richards to have any and all animals whatsoever, saving only one.

In response, the Court of Appeals simply noted that Deskins did not decide the exact same limitation at issue here, and made its own path from there – noting that there are other statutes that provide for the death of animals without noting that there are also other statutes that provide for the taking away of peoples' animals as occurred in Deskins.

The error of the Court of Appeals was in limiting the Deskins ruling strictly to its facts rather than accepting the Deskins court's actual ruling. That ruling was that a court of limited jurisdiction is empowered by RCW 3.66.067 to prescribe *any* conditions. Washington courts have previously observed that "The statutes give judges broad

authority to suspend jail time in misdemeanor cases, to impose conditions upon suspended sentences, and to revoke the suspension in whole or in part upon violation of a condition of probation." Wahleithner v. Thompson, 134 Wn.App. 931, 939, 143 P.3d 321, 324 (2006). These lower courts have trenchantly observed,

> Probation outside the SRA is not a matter of right but a matter of grace, privilege, or clemency "granted to the deserving, and withheld from the undeserving, as sound official discretion may dictate." See State v. Farmer, 39 Wn.2d 675, 679, 237 P.2d 734 (1951). In this older version of probation, which remains applicable to misdemeanants, a court may impose probationary conditions that bear a reasonable relation to the defendant's duty to make restitution or that tend to prevent the future commission of crimes. State v. Summers, 60 Wn.2d 702, 707, 375 P.2d 143 (1962).

State v. Williams, 97 Wn.App. 257, 263, 983 P.2d 687, 691 (1999).

What the Summers court observed in 1962 remains true today: as to those subject to misdemeanor probation, the only check on the sentencing discretion of the court is that the defendant's probation must involve restitution, or, more relevant here, "tend to prevent the future commission of crimes." Id.

In Summers, this court took up the question whether the defendant, who committed manslaughter by striking someone with his fist who died of the blow, could be required under a condition of suspended sentence (a possibility then in Superior Court as it remains today in District Court) to faithfully pay child support for his own children – not the victim's children, the defendant's children. Summers, 60 Wn.2d at 707.

The court ruled against this sentence condition for three reasons, two of which are not relevant here and one of which is. The first irrelevant reason is that the statute the court interpreted – which is different from the probation statute for District Court today – did not provide for compliance with orders for financial support yet to be handed down by the courts. Id. The second irrelevant reason is that the order improperly delegated the amount of child support payments to the probation officer rather than the court – an issue not instructive here. Id., at 708.

The ruling that carries through to the present day is one the Summers court described by quoting at length from an Arizona Supreme Court decision, the wisdom of which it recognized and adopted:

> We are reluctant indeed to interfere with the discretion exercised by the trial court in imposing conditions on a suspension of a sentence, and shall uphold any such conditions which on any reasonable theory tend to cause a defendant to make reparation for any crime which he may have committed, or to restrain him or others from the commission in the future of other crimes; but where the condition has no bearing on either of these two matters, but relates only to a future moral and not legal obligation, we think it is an abuse of the discretion vested in the trial court to fix such condition in the first place, or to revoke the suspension of sentence theretofore granted for no other reason than a failure on the part of defendant to fulfill the illegal condition. . . .

Summers, supra, 60 Wn.2d at 707-08, quoting Redewill v. Superior Court of Maricopa Cy., 43 Ariz. 68, 81, 29 P.2d 475 (1934).

For good reasons, district and municipal matters rarely rise to the level of this court. And, since 1962, strides have been taken in other areas of statute to provide – and, as we have seen in Deskins, sometimes to require – particular

conditions of probation that cover the gamut of potential conditions of probation one might generally wish to impose. For these reasons, it seems that the Court of Appeals has misread the importance of the longstanding general rule regarding conditions of probation. A sentencing court is not limited to what another law that might be applied against the defendant would require. Rather, it is incumbent upon the courts of appeal that they "*shall* uphold *any*... conditions which on *any* reasonable theory tend to restrain [a defendant] or others from the commission in the future of other crimes." Summers, supra, emphasis added.

This is strong language. And this court held to it in Deskins, in which it ruled that the provisions of a statute applicable to the defendant did not limit what conditions

the sentencing court could craft – even on the very subject the statute addressed. Against this powerful ruling, the Court of Appeals only musters the response that this court had not yet decided whether if another statutory provision provides alternate for the same thing, a sentencing court can make an order that "contradicts" those procedures. (Slip Op., p. 23.) But in Summers the defendant was ordered to pay for his victim's funeral even though there are provisions of the law requiring that lawsuits be filed. And in Deskins, the defendant was ordered not to have any animals whatsoever, even though the taking away of animals is regulated by law – RCW 16.08 existed at that time as it does now. In State v. Giraud, 68 Wn.2d 176, 177, 412 P.2d 104, 104 (1966), a defendant was required under the conditions of a suspended sentence to "surrender to the federal authorities on the charges that they are presently

asserting against him," despite the fact that the federal courts had a legal remedy – getting a warrant – for the defendant's nonappearance.

There is a law for everything, and there are multiple ways of achieving many things under the law. Challenging defendants to find related laws and draw lines between them and innovative conditions of probation creates an unnecessary complication in what is supposed to be a simple and flexible system.

The point of probation is that it is tailored to the individual in ways that the general laws cannot be. "Our trial courts have great discretion in imposing sentences within the statutory limits for misdemeanors and gross misdemeanors. This broad discretion is consistent with the tradition in American criminal jurisprudence affording

wide latitude to sentencing judges on grounds that the punishment should fit the offender and not merely the crime." State v. Anderson, 151 Wn.App. 396, 402, 212 P.3d 591, 593 (2009), citing State v. Herzog, 112 Wn.2d 419, 771 P.2d 739 (1989).

In Deskins, the problem was that a defendant might acquire, and mistreat, more dogs. The solution, created to fit that defendant, was to prohibit the possession of any animal. Here, the problem is that Ms. Richards insists on harboring a dog that through her own actions she allowed to become dangerous to the pets of her neighbors. The solution, created to fit this defendant, was to prohibit the possession of that particular animal and no others. Each was appropriate. Each was created in the best traditions of the court's broad discretion to deal with individual

defendants on an individual basis. And if the legislature determines that a particular sentencing condition, or type of sentencing condition, should be out of bounds, then it can limit the court's authority to sentence in the sentencing statute – as, in fact, the court found the legislature did in Summers. Summers, 60 Wn.2d at 707.

RAP 13.4(b)(4): Substantial Public Interest

In contradicting Deskins, the Court of Appeals flouted precedent from this court going back farther than this gray-haired attorney's lifetime. And in so doing, it has taken away an important tool from trial judges, placing them farther from being able to deal out individual justice. As this court has wisely said, "We believe the trial judge – the individual having the knowledge, experience and judgment in this area, and having the best opportunity to

observe and evaluate a particular defendant – is best suited to determine an appropriate and fair sentence in any given case." State v. Thorne, 129 Wn.2d 736, 768, 921 P.2d 514, 529 (1996). The Thorne court went on to say,

> The trial judge has the opportunity to observe the defendant, to learn the extent and the details of his or her criminal history, to hear the specific circumstances of the crime and the impact on its victims, and to compare the defendant and the crime with other offenders and crimes in the community. Thus, in our view, it is the trial judge who is in the best position to fashion a just punishment that meets the demands of society for protection and retribution.

Thorne, Id.

This is the tool the Court of Appeals cast away out of its laudable desire to save a single dangerous dog; a dog that has twice attacked animals no doubt beloved by the petitioner's neighbors at least as much as the petitioner

presumably loves her own. On the altar of this poor, poorly-socialized dog, the Court of Appeals sacrificed the power of every district and municipal court to craft innovative sentencing conditions if a line can be drawn between those conditions and any law or privilege about which a statute exists. This draws a broad exclusion around what was supposed to be an area of broad discretion.

Nor has there been any allegation in this litigation to date that the judiciary has abused its power in this area and needs reining in. Rather, this wide ruling seems to have been made in disregard of its implications to sentencing courts throughout the state that face rare fact patterns, unusual crimes, particularly individual individuals – or who simply have an innovative idea about how to most

effectively sentence a defendant. Succinctly put, judges can exercise less judgment because of this erroneous ruling.

IX. Conclusion

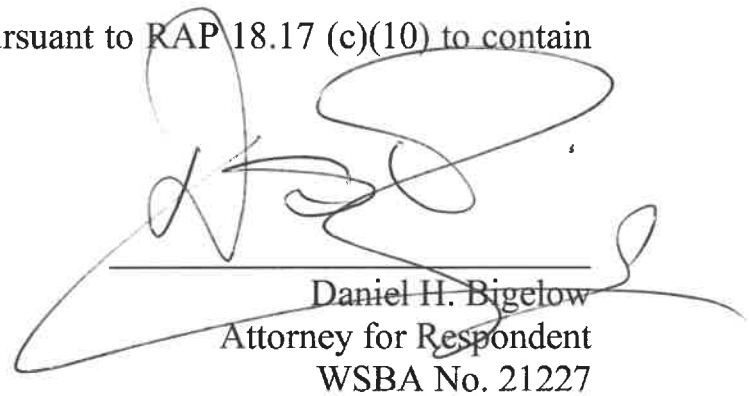
The appellant wishes this court to revisit matters that were settled decades ago in Rabon, supra, but the Rabon decision adequately settled matters and no changes in policy or law justify reconsideration at this late date.

What requires this court's attention is the fact that in its desire to spare the dangerous dog Thor – a laudable desire that the author deeply understands – the Court of Appeals court needlessly limited sentencing discretion for district and municipal judges in ways that could ramify throughout our courts for years to come. But most

importantly, the Court of Appeals' limitation of sentencing authority will discourage the sort of innovation that improves the justice system. Judges should be as free as possible to, as the Anderson court put it, fit the punishment to "the offender, and not merely the crime."

Respectfully submitted this 27th day of December, 2023.

Certified pursuant to RAP 18.17 (c)(10) to contain under 5,000 words.



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CERTIFICATE

I hereby certify that on December 28, 2023, I caused a true and correct copy of the foregoing to be served upon the following person(s) in the following manner:

[x] ACCORDS portal

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WAHKIAKUM COUNTY PROSECUTOR'S OFFICE

December 28, 2023 - 1:16 PM

Transmittal Information

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Appellate Court Case Title:	State of Washington v. Jennifer A. Richards
Superior Court Case Number:	21-1-00014-4

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