90843-5

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

Court of Appeals No. 31641-6-III

STATE OF WASHINGTON, Respondent,

v.

THOMAS RALPH LEVITON, Petitioner.

PETITION FOR REVIEW

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TABLE OF CONTENTS

AUTHORITIES CITED

Cases

Federal:

Washington State:

Other States:

Statutes

Court Rules

Court Orders

Other Materials

I. IDENTITY OF PETITIONER

Thomas Ralph Leviton requests that this court accept review of the decision designated in Part II of this petition.

II. DECISION OF THE COURT OF APPEALS

Petitioner seeks review of the decision of the court of appeals filed on August 12, 2014 and amended on August 28, 2014, affirming the Spokane County Superior Court's denial of Leviton's motion to withdraw his guilty plea. A copy of the court of appeals' unpublished opinion and its order granting reconsideration and amending the opinion are attached hereto.

III. ISSUES PRESENTED FOR REVIEW

Leviton sought to withdraw his guilty plea, contending that it was not knowing, intelligent or voluntary and that his counsel rendered ineffective assistance in failing to evaluate the comparability of out-of-state convictions used to calculate his offender score. On review, he contends that (1) his attorney rendered ineffective assistance of counsel in failing to investigate the comparability of out-of-state convictions with Washington offenses in order to accurately advise him of the

consequences of conviction, and (2) his plea was not knowing, intelligent, or voluntary as a result of the failure to investigate his offender score.

IV. STATEMENT OF THE CASE

Thomas Leviton pleaded guilty to one count of trafficking in stolen property in the second degree with an offender score of 5. CP 5, 6. Before sentencing, Leviton obtained new counsel and moved to withdraw his guilty plea, arguing that his plea was involuntary and he was denied effective assistance of counsel due to uncertainty concerning his offender score, which was based entirely upon convictions from Montana. CP 40, 42, 48-49. The trial court denied Leviton's motion and sentenced him to a residential DOSA sentence based upon the contested offender score of 5. CP 53, 57, 59.

Leviton's DOSA sentence was subsequently revoked and he was sentenced to 17 months' imprisonment. CP 93. Although defense counsel again raised the issue of the comparability of the Montana convictions to Washington offenses, the trial court relied upon the offender score of 5 set forth in the original judgment and sentence. RP (4/12/13) 17-21, RP (4/18/13) 65. On direct appeal, which was consolidated with Leviton's *pro se* personal restraint petition, the court of appeals originally declined to consider Leviton's arguments because he had already completed his

sentence at the time of the appellate ruling. *Unpublished opinion* at 5. The court of appeals further declined to address Leviton's argument that ineffective assistance of counsel rendered his guilty plea unknowing, unintelligent and involuntary such that he should be permitted to withdraw it, contending (without reference to the comparability analysis conducted at the sentencing hearing and in the appellate briefing) that his argument was based on matters outside the record. *Unpublished opinion* at 7.

Leviton now seeks review and requests that this Court enter a ruling that his guilty plea was not knowing, intelligent or voluntary when his trial attorney failed to conduct a comparability analysis of his out-of-state convictions to determine whether they could properly be included in his offender score.

V. ARGUMENT WHY REVIEW SHOULD BE ACCEPTED

Under RAP 13.4(b)(3) and (4), review will be accepted if a significant question of law under the Constitution of the State of Washington or of the United States is involved, or if the petition involves an issue of substantial public interest that should be determined by the Supreme Court. Both factors are satisfied in the present case.

More than 90% of criminal cases resolve in convictions, and more than 90% of convictions result from guilty pleas. Chin, Gabriel J. &

Richard W. Holmes, Jr., *Effective Assistance of Counsel and the Consequences of Guilty Pleas*, 87 Cornell L. Rev. 697, 698 (2002). Accordingly, "[t]he most important service that criminal defense lawyers perform for their clients is not dramatic cross-examination of prosecution witnesses or persuasive closing arguments to the jury; it is advising clients whether to plead guilty and on what terms." *Id.*

The United States Supreme Court has expressly incorporated a duty to provide effective assistance in the course of plea bargaining into its ineffective assistance of counsel jurisprudence. Most recently, in *Missouri v. Frye*, 566 U.S. ___, 132 S. Ct. 1399, 1407-08, 182 L.Ed.2d 379 (2012), the Supreme Court stated,

> The reality is that plea bargains have become so central to the administration of the criminal justice system that defense counsel have responsibilities in the plea bargain process, responsibilities that must be met to render the adequate assistance of counsel that the Sixth Amendment requires in the criminal process at critical stages. Because ours "is for the most part a system of pleas, not a system of trials," it is insufficient simply to point to the guarantee of a fair trial as a backstop that inoculates any errors in the pretrial process. "To a large extent ... horse trading [between prosecutor and defense counsel] determines who goes to jail and for how long. That is what plea bargaining is. It is not some adjunct to the criminal justice system; it is the criminal justice system." [Defendants] who do take their case to trial and lose receive longer sentences than even Congress or the prosecutor might think appropriate, because the longer sentences exist on the books largely for bargaining purposes. This often results in individuals who

> accept a plea bargain receiving shorter sentences than other individuals who are less morally culpable but take a chance and go to trial. In today's criminal justice system, therefore, the negotiation of a plea bargain, rather than the unfolding of a trial, is almost always the critical point for a defendant.

(Internal citations omitted.) In addition, the federal jurisprudence has recognized that ineffective assistance is sufficiently broad to incorporate the failure to provide accurate advice about the consequences of guilty pleas as well as affirmative misadvice. *Padilla v. Kentucky*, 559 U.S. 356, 369-71, 130 S. Ct. 1473, 176 L.Ed.2d 284 (2010). Thus, the federal authorities plainly contemplate defense counsel's active participation in plea bargaining and obtaining sufficient information about the case to fully and effectively advise a defendant of the costs and benefits of accepting a plea offer versus proceeding to trial.

Additionally, Washington courts have recognized the importance of counsel's role in evaluating and recommending plea deals, including the importance of conducting an adequate investigation sufficient to assist the defendant "in making an informed decision as to whether to plead guilty or to proceed to trial." *State v. A.N.J.*, 168 Wn.2d 91, 111, 225 P.3d 956 (2010). The *A.N.J.* Court recognized that the standards for adequate representation adopted by the Washington Bar Association and the Washington Defender Association are relevant to evaluate the

effectiveness of counsel's performance. *Id.* at 110-11. Among the minimum professional standards adopted by the Washington Bar Association as well as by the Washington Supreme Court is the requirement that counsel "[b]e familiar with the consequences of a conviction or adjudication." WSBA, *Standards for Indigent Defense Services*, Standard 14(1)(E) (2011); General Order No. 27500-A-1004 of the Supreme Court of Washington, *In the Matter of the Adoption of New Standards for Indigent Defense and Certification of Compliance* (adopted June 15, 2012), Standard 14.1(E). These authorities, likewise, support the proposition that defense counsel's duties to the client include investigating and advising the defendant concerning the consequences of conviction.

The proper calculation of a defendant's offender score has a direct bearing on the consequences of conviction because it determines the range of imprisonment to which the defendant can be subjected. Accordingly, effectively advising a defendant concerning the consequences of a guilty plea necessarily presumes an investigation into prior offenses and an evaluation into the inclusion of prior convictions in calculating the offender score. Factors such as the comparability of out-of-state convictions and whether multiple convictions constitute the same criminal conduct affect the offender score calculation and, consequently, the

penalties to which the defendant can be subjected. *See* RCW 9.94A.525(3), (5)(a)(i). Thus, an investigation into the existence and nature of prior convictions would seem to be necessary for counsel to accurately and fully advise a defendant of the likely consequences of the conviction. This information is vital to intelligently and knowingly evaluate a plea offer because it directly affects the cost-benefit analysis of the plea. A defendant must have a reasonable understanding of potential challenges to the offender score to properly evaluate whether the plea results in a better outcome. A defendant could conceivably fare better by proceeding to trial, being convicted, and successfully challenging the inclusion of prior convictions in the offender score, than by pleading guilty to a lesser charge with the prior convictions going unchallenged.

Despite the centrality that the fact and nature of prior convictions hold in determining the consequences of conviction, no published case with precedential authority in the State of Washington evaluates whether defense counsel has a duty to inquire into the fact or nature of prior convictions before advising a defendant whether to accept a guilty plea. Other courts considering similar issues have held that improper information from counsel about the length of a sentence may be grounds to withdraw a guilty plea. *See, e.g., State v. Leroux*, 689 So.2d 235, 236 (Fla. Sup. Ct. 1996); *Cobb v. State*, 895 So.2d 1044, 1049-50 (Ala. Crim.

App. 2004) (failure to investigate prior convictions to determine eligibility for alternative sentencing); *Richie v. State*, 777 So.2d 977, 977-78 (Fla. Dist. Ct. App. 1999) (failure to object to scoresheet errors constitutes ineffective assistance of counsel and may entitle a defendant to post-conviction relief).

Considering the number of Washington criminal cases resolved through negotiated plea agreements, the question presented for review is a matter of substantial public interest because it implicates the basic information that must be provided to the overwhelming majority of criminal defendants to knowingly and intelligently determine whether to plead guilty or proceed to trial. In addition, the question presented concerns a substantial question of constitutional interpretation involving the scope of counsel's duties under the Sixth Amendment in assisting defendants in evaluating plea offers. While existing case law developed in *A.N.J.* plainly establishes counsel's obligation to conduct a reasonable factual investigation of the charges and possible defenses prior to entry of a guilty plea, no similar standards have been established defining counsel's duty to investigate and evaluate the defendant's offender score, even though the offender score determines the permissible length of incarceration. Evaluation and clarification of defense counsel's obligations in investigating the offender score before advising the

defendant about plea offers is likely to be of substantial interest and import both to the ninety-plus percent of defendants who enter guilty pleas and to the criminal defense bar seeking to diligently comply with constitutional and court-adopted standards of effective assistance.

VI. CONCLUSION

For the foregoing reasons, the petition for review should be granted under RAP 13.4(b)(3) and (4) and this Court should enter a ruling that Leviton received ineffective assistance of counsel that rendered his guilty plea unknowing, unintelligent and involuntary when counsel failed to conduct a comparability analysis of Leviton's out-of-state convictions before Leviton entered a guilty plea.

RESPECTFULLY SUBMITTED this 25th day of September, 2014.

ANDREA BURKHART, WSBA #38519
Attorney for Petitioner

DECLARATION OF SERVICE

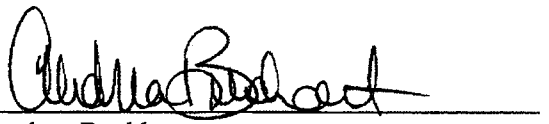
I, the Undersigned, hereby declare that on this date, I caused to be served a true and correct copy of the foregoing Petition for Review upon the following parties in interest by depositing them in the U.S. Mail, first-class, postage pre-paid, addressed as follows:

Mark Lindsey
Spokane County Prosecutor's Office
1100 W. Mallon Ave.
Spokane, WA 99260-0270

Thomas R. Leviton, DOC #319241
Coyote Ridge Correctional Center
PO Box 769
Connell, WA 99326

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

Signed this 25th day of September, 2014 in Walla Walla, Washington.



Andrea Burkhart

APPENDIX

FILED
August 28, 2014
In the Office of the Clerk of Court
WA State Court of Appeals, Division III

COURT OF APPEALS, STATE OF WASHINGTON, DIVISION III

STATE OF WASHINGTON, Respondent, v. THOMAS R. LEVITON, Appellant. In re Personal Restraint of: THOMAS R. LEVITON, Petitioner.	)	No. 31641-6-III Consolidated with No. 32136-3-III ORDER GRANTING MOTION FOR RECONSIDERATION AND AMENDING OPINION Dated August 12, 2014

THE COURT has considered appellant's motion for reconsideration of this court's decision of August 12, 2014, and having reviewed the records and files herein, is of the opinion the motion should be granted. Therefore,

IT IS ORDERED, appellant's motion for reconsideration is hereby granted.

IT IS FURTHER ORDERED that the opinion shall be amended by replacing the words "should decline" in the first paragraph on page 5, line four with "declines."

IT IS FURTHER ORDERED that the opinion shall be amended by replacing the

words "should dismiss" in the first paragraph on page 5, line 9, with "dismisses."

IT IS FURTHER ORDERED that the opinion shall be amended by replacing the words "should conclude" in the first paragraph on page 7, line 10 with "concludes."

IT IS FURTHER ORDERED that the opinion shall be amended by replacing the second paragraph in its entirety on page 5 with the following:

> To the extent Mr. Leviton's PRP seeks withdrawal of his guilty plea, we reach this issue even though Mr. Leviton has served his sentence because "he meets the restraint requirements . . . due to the stigma and collateral consequences associated with his conviction." *In re Martinez*, 171 Wn.2d 354, 363-64, 256 P.3d 277 (2011). Mr. Leviton argues RCW 9A.82.055(1), the second degree trafficking in stolen property statute, is unconstitutional. "[B]eing charged, convicted, and sentenced pursuant to an unconstitutional charging statute qualifies as a manifest error affecting a constitutional right." *State v. Rice*, 174 Wn.2d 884, 893, 279 P.3d 849 (2012). However, like all constitutional challenges, a party disputing the constitutionality of a statute must provide more than bare assertions and conclusory allegations. *In re Rice*, 118 Wn.2d 876, 886, 828 P.2d 1086 (1992). Mr. Leviton only provides a one sentence statement challenging the constitutionality of RCW 9A.82.055(1). This is insufficient to warrant further "judicial consideration and discussion." *Id.*

DATED: August 28, 2014
PANEL: Jj. Brown, Korsmo, Siddoway
FOR THE COURT:

LAUREL H. SIDDOWAY
CHIEF JUDGE

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION THREE

STATE OF WASHINGTON, Respondent, v. THOMAS R. LEVITON, Appellant. In re Personal Restraint of: THOMAS R. LEVITON, Petitioner.	No. 31641-6-III Consolidated with No. 32136-3-III UNPUBLISHED OPINION

BROWN, J. — Thomas Ralph Leviton pleaded guilty to second degree trafficking in stolen property and the sentencing court sentenced him based on an offender score of 5. In appeal briefs filed by his appellate counsel, Mr. Leviton requests resentencing, contending his trial counsel gave ineffective assistance by failing to investigate the comparability of his prior Montana convictions before he pleaded guilty. In a pro se statement of additional grounds for review (SAG), Mr. Leviton seeks withdrawal of his guilty plea or resentencing, contending his trial counsel gave ineffective assistance by misinforming him of the evidence against him and failing to challenge various problems

with his offender score. In a pro se personal restraint petition (PRP), Mr. Leviton reiterates matters addressed by his appellate counsel's brief and his SAG, while raising additional concerns about his offender score. We disagree with all of Mr. Leviton's contentions, and reason we can give no relief because he has completed serving his sentence. Accordingly, we affirm and dismiss Mr. Leviton's PRP.

FACTS

On May 30, 2012, Mr. Leviton pleaded guilty to second degree trafficking in stolen property. He signed an understanding of his criminal history, including eight Montana convictions: two forgery convictions from 2005 and 1995, two burglary convictions from 1993 and 1991, three convictions from 2005 and 1998 for criminal possession of dangerous drugs, and one conviction from 1989 for fraudulently obtaining dangerous drugs. He agreed "any out-of-state . . . conviction [listed above] is the equivalent of a Washington felony offense." Clerk's Papers (CP) at 49. Based on this document and his discussions with his attorney, Mr. Leviton told the court he agreed he had an offender score of 5. Mr. Leviton had no questions for the court regarding his offender score.

Under a plea agreement, the State recommended a residential treatment-based DOSA.[1] The court ordered presentence chemical dependency evaluations that determined Mr. Leviton met DOSA eligibility criteria. Mr. Leviton retained a new attorney in August 2012. The court continued the sentencing hearing. Mr. Leviton

[1] The drug offender sentencing alternative is an either prison-based or residential treatment-based alternative sentence available for drug offenders in some cases. *See* RCW 9.94A.660, .662, .664.

moved to withdraw his guilty plea in September 2012, arguing it was not knowing, intelligent, or voluntary, and his prior attorney rendered ineffective assistance "because his [prior] attorney did not properly investigate his criminal history." CP at 43. The court denied the motion, reasoning that while Mr. Leviton questioned certain irrelevant discrepancies between listed crime dates and conviction dates, he did not challenge the existence of his Montana convictions, and had presented no evidence that his prior attorney misinformed him on comparability, offender score, sentencing range, or any direct consequence of his guilty plea.

At the sentencing hearing on November 20, 2012, the State presented certified copies of Mr. Leviton's Montana convictions and argued he had an offender score of 5. Mr. Leviton challenged this number, partly disputing whether his Montana convictions were "felony convictions for Washington sentencing purposes." I Report of Proceedings (RP) at 26. The court concluded he had an offender score of 5 and sentenced him to a residential treatment-based DOSA.

When Mr. Leviton violated his sentence conditions, the State petitioned to revoke his residential treatment-based DOSA. At the revocation hearing on April 12, 2013, the court allowed him to raise or revisit an offender score issue, the comparability of his Montana convictions to Washington analogues. Mr. Leviton argued "the Montana statutes are broader than the Washington statutes." RP (Apr. 12, 2013) at 17. The court granted the DOSA revocation and continued the sentencing hearing, giving the State additional time to respond to Mr. Leviton's comparability argument.

At the sentencing hearing on April 18, 2012, the State argued Mr. Leviton waived his comparability argument. The court declined to reanalyze comparability, instead adhering to the offender score contained in Mr. Leviton's judgment and sentence. Based on an offender score of 5, the court ordered Mr. Leviton to serve 17 months of confinement with 118 days of credit for time served. He sought review from this court.

ANALYSIS

The issue is whether Mr. Leviton's trial counsel gave ineffective assistance. As reasoned below, Mr. Leviton is not entitled to the relief he seeks.

In his PRP, Mr. Leviton makes declarations that he expects to be released on May 7, 2014, if not sooner. This evidence comports with other documents in our record. On April 18, 2013, the court ordered Mr. Leviton to serve 17 months of confinement with 118 days of credit for time served. Even if he received no credit for good time, he would have been released on May 23, 2014.[2] Mr. Leviton recognized this as a procedural hurdle, stating: "Please be aware of the time constraints as I will not benefit from relief granted. Sentence expires 4/14. . . . The sentence will expire April or May 2014 and I will receive benefit from relief no other way." PRP at 2-3. He reiterated: "Time is of the essence as petitioner will enjoy no relief, if granted, if the case review lingers for too long. Petitioners sentence on which relief is sought will expire May 7, 2014."

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[2] April 18, 2013 plus 17 months equals an end date of September 18, 2014. TIMEANDDATE.COM, http://www.timeanddate.com/date/dateadded.html?m1=4&d1=18&y1=2013&type=add&ay=&am=17&aw=&ad= (last visited July 29, 2014). September 18, 2014 minus 118 days equals an end date of May 23, 2014. TIMEANDDATE.COM, http://www.timeanddate.com/date/dateadded.html?m1=09&d1=18&y1=2014&type=sub&ay=&am=&aw=&ad=118 (last visited July 29, 2014).

PRP Statement of Facts & Additional Grounds at 2.

Thus, to the extent Mr. Leviton's appeal briefs, SAG, and PRP seek resentencing, this court "can no longer provide effective relief." *Orwick v. City of Seattle*, 103 Wn.2d 249, 253, 692 P.2d 793 (1984); *In re Det. of Cross*, 99 Wn.2d 373, 376-77, 662 P.2d 828 (1983). This court should decline to review the moot issues underlying those requests for relief because they do not involve "matters of continuing and substantial public interest." *Sorenson v. City of Bellingham*, 80 Wn.2d 547, 558, 496 P.2d 512 (1972); *Grays Harbor Paper Co. v. Grays Harbor County*, 74 Wn.2d 70, 73, 442 P.2d 967 (1968). Because Mr. Leviton's appeal briefs seek no relief other than resentencing, this court should dismiss them entirely.

To the extent Mr. Leviton's PRP seeks withdrawal of his guilty plea, this court cannot provide him such relief because he no longer meets the requirements to petition for it. This court may grant relief solely "if the petitioner is under a 'restraint.'" RAP 16.4(a). "A petitioner is under a 'restraint' if the petitioner has limited freedom because of a court decision in a civil or criminal proceeding, the petitioner is confined, the petitioner is subject to imminent confinement, or the petitioner is under some other disability resulting from a judgment or sentence in a criminal case." RAP 16.4(b). Because Mr. Leviton's PRP fails to show these restraints apply to him, this court should dismiss it entirely.

Finally, to the extent Mr. Leviton's SAG seeks withdrawal of his guilty plea, he fails to meet his burden of proof. This court reviews an ineffective assistance of counsel claim de novo. *In re Pers. Restraint of Fleming*, 142 Wn.2d 853, 865, 16 P.3d 610

(2001). The Sixth Amendment guarantees a criminal defendant the right to effective assistance of counsel. *McMann v. Richardson*, 397 U.S. 759, 771 & n.14, 90 S. Ct. 1441, 25 L. Ed. 2d 763 (1970); *Yarborough v. Gentry*, 540 U.S. 1, 5, 124 S. Ct. 1, 157 L. Ed. 2d 1 (2003). To prove counsel gave ineffective assistance, the defendant must show "counsel's performance was deficient" and "the deficient performance prejudiced the defense." *Strickland v. Washington*, 466 U.S. 668, 687, 104 S. Ct. 2052, 80 L. Ed. 2d 674 (1984). Failure to show either element defeats the claim. *Id.* at 697.

Deficient performance occurs if "counsel's representation fell below an objective standard of reasonableness." *Id.* at 688. This standard requires "reasonableness under prevailing professional norms" and "in light of all the circumstances." *Id.* at 688, 690. The defendant must overcome a "strong presumption that counsel's conduct falls within the wide range of reasonable professional assistance." *Id.* at 689. To do so, the defendant must show counsel's performance cannot be explained as a legitimate strategic or tactical decision. *Id.*

Prejudice occurs if "there is a reasonable probability that, but for counsel's unprofessional errors, the result of the proceeding would have been different." *Id.* at 694. A reasonable probability of a different result exists where counsel's deficient performance "undermine[s] confidence in the outcome." *Id.* The defendant "need not show that counsel's deficient conduct more likely than not altered the outcome in the case." *Id.* at 693. Instead, the defendant "has . . . the burden of showing that the decision reached would reasonably likely have been different absent the errors." *Id.* at 696. This standard requires evaluating the totality of the record. *Id.* at 695.

Mr. Leviton contends his trial counsel gave ineffective assistance by misinforming him of the evidence against him and failing to challenge various problems with his offender score. Mr. Leviton's concerns depend fully on matters this court may not consider because they are outside our record. *See State v. McFarland*, 127 Wn.2d 322, 335, 899 P.2d 1251 (1995) (stating an appellate court may not consider matters outside its record when reviewing an ineffective assistance of counsel claim on direct appeal). Regardless, the absence of a meaningful relationship between Mr. Leviton and his trial counsel does not prove counsel performed deficiently or prejudiced the defense. *See Morris v. Slappy*, 461 U.S. 1, 13-14, 103 S. Ct. 1610, 75 L. Ed. 2d 610 (1983); *Strickland*, 466 U.S. at 687. Considering all, this court should conclude Mr. Leviton's trial counsel gave effective assistance.

Affirmed and PRP is dismissed.

A majority of the panel has determined this opinion will not be printed in the Washington Appellate Reports, but it will be filed for public record pursuant to RCW 2.06.040.

Brown, J.

WE CONCUR:

Siddoway, C.J.

Korsmo, J.

BURKHART & BURKHART, PLLC

September 25, 2014 - 2:53 PM

Transmittal Letter

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- ☐ Response to Personal Restraint Petition
- ☐ Reply to Response to Personal Restraint Petition
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Comments:

No Comments were entered.

Sender Name: Andrea J Burkhart - Email: Andrea@BurkhartAndBurkhart.com