No.
COA No. 70462-1-I

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

90957-1

STATE OF WASHINGTON,

Respondent,

v.

ROBERT G. ISABEL,

Petitioner.

ON APPEAL FROM THE SUPERIOR COURT OF
THE STATE OF WASHINGTON FOR KING COUNTY

The Honorable Marianne Spearman

PETITION FOR REVIEW

THOMAS M. KUMMEROW
Attorney for Petitioner

WASHINGTON APPELLATE PROJECT
1511 Third Avenue, Suite 701
Seattle, Washington 98101
(206) 587-2711

TABLE OF CONTENTS

TABLE OF AUTHORITIES

A. IDENTITY OF PETITIONER

Robert Isabel asks this Court to accept review of the Court of Appeals decision terminating review designated in part B of this petition.

B. COURT OF APPEALS DECISION

Pursuant to RAP 13.4(b), petitioner seeks review of the unpublished Court of Appeals decision in *State v. Robert G. Isabel*, No. 70462-1-I (September 15, 2014). A copy of the decision is in the Appendix at pages A-1 to A-8.

C. ISSUES PRESENTED FOR REVIEW

1. A trial court must grant a mistrial where a trial irregularity so prejudiced the jury that it denied the defendant a fair trial. Witness misconduct may be the basis for a mistrial. Here, in a non-responsive answer, the victim *sua sponte* testified about threats to himself and his family and intimated they came from Mr. Isabel. Does the trial court's failure to declare a mistrial because of the witness's misconduct in this case present an issue of substantial public interest that should be determined by this Court?

2. As part of a defendant's constitutionally protected right to present a defense the defendant is entitled to instructions embodying

his theory of the case if the evidence supports that theory. Here, the State failed to call as a witness the police officer who took the initial report from the victim and his cousin. The information from the police officer's initial investigation was critical to Mr. Isabel's cross-examination of the victim. Mr. Isabel unsuccessfully sought a missing witness instruction because of the State's failure to call the police officer. Is a significant question of law under the United States and Washington Constitutions involved where Mr. Isabel's right to present a defense was impermissibly infringed by the trial court's refusal to instruct the jury on his theory of the case?

D. STATEMENT OF THE CASE

Robert Isabel was charged with drive-by shooting and unlawful possession of a firearm in the first degree. CP 1-2. Prior to trial, Mr. Isabel moved to compel the testimony of Seattle Police Officer Michael Connors. 1/8/2013RP 64. Officer Connors was the first police officer to respond to Willie Watson's, the victim's cousin, 911 call. 1/8/2013RP 64-65. Officer Connors conducted the initial interview with the alleged victim, Marion Tucker. 1/8/2013RP 65. Officer Connors' interview contained information that Mr. Isabel sought to impeach Mr. Tucker. 1/8/2013RP 65. Officer Connors had left the Seattle Police Department

and the State allegedly had no contact information for him. 1/8/2013RP 67. The State noted that it had issued a subpoena for Officer Connors, but had no further contact with him. 1/8/2013RP 68. The trial court ordered the State to disclose the officer's last known address:

> I don't think the State or the police have an obligation to hunt down potential Defense witnesses. It includes information such as radio transmissions. They have an obligation to turn that over. They don't have an obligation to hunt for your witnesses.
>
> But they should have the last known address of their employee. I don't know why they can't turn that over.

1/8/2013RP 69.

Mr. Isabel subsequently proposed instructing the jury that Officer Connors was a "missing witness" as he was peculiarly available to the State:

> We believe this witness, Officer Michael Connors, the State has control over this witness. He worked with the Seattle Police Department . . .
>
> Officer Connors has records with the Seattle Police Department. Whether he has been moved or transferred, they can get a hold of them. Officer Connors has cases with the Seattle Police Department, had cases with the Seattle Police Department that were ready for trial. And the prosecutor and the Seattle Police Department would have access to him to bring them [sic] here for trials.
>
> He is the first officer on the scene. And in his report there is some exculpatory evidence in that report from

> Officer Connors . . . He did write a report on this incident which is the basis for this whole investigation.

1/15/2013RP 72-73. The court refused to instruct on "missing witness":

> I suggested to you that maybe you should have – if you want me to sign an order to give to the East Precinct. They must have his last known address. They must have had to send out tax information.
>
> Frankly, this is in control of the Seattle Police Department, not the Prosecutor's Office. These are two separate entities.
>
> . . .
>
> The evidence that Mr. Connors would testify to would be for impeaching Mr. Tucker on the stand. It wouldn't even be substantive evidence.
>
> . . .
>
> The other element is that there be no satisfactory explanation of why the State didn't call the person. Obviously, the State didn't call him because they don't know where he is. He is no longer working there. Maybe the same reason the Defense can't find him.

1/15/2013RP 79.[1]

During the trial, Mr. Tucker provided a non-responsive answer to a question on cross-examination:

> Q: You continued south after you stopped correct?
>
> A: Uh-huh.

---

[1] Connors' report disclosed that there were two individuals inside the car from which Mr. Isabel was alleged to have shot. 1/15/2013RP 28-30. In addition, the location of the shooting was significantly different in Connors' report from the location Mr. Tucker alleged the shooting to have occurred. *Id.* at 28-29.

> Q: You went to Mr. Watson's house?
>
> A: Yes, sir.
>
> Q: How far is Mr. Watson's house?
>
> A: Well, I can't tell you that, actually tell you where he lives at. *Mr. Isabel's family has been threatening my friends and my family and my kids.* So I can't tell you that.

1/10/2013RP 123 (emphasis added). Mr. Isabel immediately objected to the answer as nonresponsive. *Id.* The court merely answered by stating, "Ask another question." *Id.*

At the end of that day's trial testimony, Mr. Isabel moved for a mistrial based upon Mr. Tucker's nonresponsive answer regarding threats. 1/10/2013RP 136. Mr. Isabel argued this testimony by Mr. Tucker was particularly prejudicial because of the fact he was charged with drive-by shooting. 1/14/2013RP 4-5. The trial court denied the motion for a mistrial, noting:

> [T]he statement is not attributed to Mr. Isabel. It's attributed to Mr. Isabel's family. And presumably Mr. Isabel doesn't have 100 percent control of his family members.
>
> There was no motion in limine to instruct the witness not to mention that, so there's been no motion in limine violated. I do not find it to be inherently prejudicial.

1/14/2013RP 10. The court then went further and without prompting stated: "And at this point, I don't think it would be in the Defendant's best interest to admonish the jury about it and bring it up again." *Id.*

At the conclusion of the jury trial, Mr. Isabel was convicted as charged. CP 54-55.

On appeal, Mr. Isabel submitted his convictions should be reversed because of the court's refusal to grant a mistrial and the court's refusal to instruct the jury that Officer Connors was a missing witness. The Court of Appeals affirmed Mr. Isabel's convictions, ruling that the trial court did not abuse its discretion in denying a mistrial, and the trial court did not err when it refused to give the missing witness instruction because the officer's testimony would have been cumulative. Decision at 4-8.

E. ARGUMENT ON WHY REVIEW SHOULD BE GRANTED

1. A MISTRIAL WAS THE ONLY REMEDY AVAILABLE IN LIGHT OF THE TRIAL COURT'S REFUSAL TO GIVE A CURATIVE INSTRUCTION

A court should grant a mistrial when the defendant has been so prejudiced that nothing short of a new trial can insure that he will be tried fairly. *State v. Mak,* 105 Wn.2d 692, 701, 718 P.2d 407 (1986). In deciding whether a remark was so prejudicial as to deny a defendant his

right to a fair trial, a court examines (1) the seriousness of the remark, (2) whether it involved cumulative evidence, and (3) whether the trial court properly instructed the jury to disregard it. *State v. Johnson,* 124 Wn.2d 57, 76, 873 P .2d 514 (1994).

Here, the Court of Appeals found Tucker's remarks to be less than serious because they were not attributed to Mr. Isabel's behavior or prior bad acts, but rather to his family. Decision at 5-6. But this simply ignores reality. Mr. Isabel was the individual charged with the offenses and facing trial. Although the alleged threat was apparently made by a family member, the threat would have certainly been attributed by the jury to Mr. Isabel given the fact he was charged with a violent offense; drive-by shooting.

In addition, the Court ruled that Mr. Isabel was at fault for not requesting the curative instruction at the time of Tucker's claim. Decision at 6. While the trial court did rule that a curative instruction would have been given if requested at the time of Tucker's testimony, nevertheless, the choice of a curative instruction was taken away from Mr. Isabel by the trial judge's subsequent refusal to give the instruction rendering any objection or request by Mr. Isabel futile at best.

Crucial to appellate decisions affirming the denial of a mistrial for a serious irregularity is the trial court's admonishment to the jury to ignore the irregularity. *See e.g., State v. Taylor*, 60 Wn.2d 32, 33, 371 P.2d 617 (1962). Once that remedy was eliminated by the trial court's refusal to admonish the jury, a mistrial was the only remaining alternative.

This Court should accept review to determine whether the trial court's refusal to give a curative instruction and deny the mistrial motion was an abuse of discretion.

2. OFFICER CONNORS' TESTIMONY WAS NOT CUMULATIVE, THUS IT WAS ERROR TO FAIL TO INSTRUCT THE JURY HE WAS A "MISSING WITNESS"

The Sixth Amendment and the Due Process Clause of the Fourteenth Amendment guarantee a defendant's right to a trial by jury. *Sullivan v. Louisiana*, 508 U.S. 275, 277, 113 S.Ct. 2078, 2080, 124 L.Ed.2d 182 (1993) (the Sixth Amendment protects the defendant's right to trial by an impartial jury, which includes "as its most important element, the right to have the jury, rather than the judge, reach the requisite finding of 'guilty.'"). Similarly, the Sixth Amendment and the Due Process Clause of the Fourteenth Amendment require that criminal defendants be afforded a meaningful opportunity to present a complete

defense. *California v. Trombetta*, 467 U.S. 479, 485, 104 S.Ct. 2528, 81 L.Ed.2d 413 (1984). As part of the constitutionally protected right to present a defense, the defendant is entitled to instructions embodying his theory of the case if the evidence supports that theory. *State v. Benn*, 120 Wn.2d 631, 654, 845 P.2d 289, *cert. denied*, 510 U.S. 944 (1993).

Under the missing witness doctrine, a jury may draw an inference against a party who fails to produce a witness when that party has control of the witness and the witness is naturally in that party's interest to produce. *State v. Blair*, 117 Wn.2d 479, 485-86, 816 P.2d 718 (1991). The missing witness inference applies in criminal cases where the State fails to call a logical witness. *See, e.g., Blair*, 117 Wn.2d at 487-88.

The Court of Appeals ruled that Connors' testimony would have been cumulative because it would have been provided through other police witnesses. Decision at 7-8. But this ignores the impeachment value of the jury hearing evidence presented by the witness who obtained it, here Officer Connors. Further, contrary to the trial court's conclusion, Connors' testimony would have been critical to Mr. Isabel's defense. Mr. Isabel's defense rested on proving Tucker's lack

of credibility. Here, that would have been shown to the jury by impeaching Tucker with the difference between in his statements given initially to Officer Connors, who was the first responding police officer, and those given later to Detective Hughey. As a consequence, Mr. Isabel was denied his constitutionally protected right to present a defense because he was denied the ability to argue his theory of the case, that Mr. Tucker should not have been considered credible by the jury.

In addition, the Court was persuaded that the State adequately explained Connors' absence. Decision at 8. But, had Connors been a critical witness to a case in which his attendance at trial meant the difference between whether the State proceeding to trial or having to dismiss, the State would have bent over backwards to assure his attendance. The fact the Officer was not a primary witness here cannot be used to excuse the State's failure to carry out its duty to keep track of its witnesses.

The trial court violated Mr. Isabel's right to present a defense when it refused to instruct the jury on the missing witness. Mr. Isabel asks this Court to grant review, so find, and reverse his convictions.

F. CONCLUSION

For the reasons stated, Mr. Isabel asks this Court to grant review and reverse his convictions.

DATED this 15th day of October 2014.

Respectfully submitted,

THOMAS M. KUMMEROW (WSBA 21518)
tom@washapp.org
Washington Appellate Project – 91052
Attorneys for Petitioner

APPENDIX A

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

STATE OF WASHINGTON, Respondent, v. ROBERT G. ISABEL, Appellant.	)	DIVISION ONE No. 70462-1-I UNPUBLISHED OPINION FILED: September 15, 2014

DWYER, J. – Robert Isabel seeks a new trial on charges of drive-by shooting and unlawful possession of a firearm, arguing the trial court erred in denying his motion for a mistrial and refusing to give a missing witness instruction. We affirm.

I

In the early morning hours of January 3, 2012, Marion Tucker and his cousin Willie Watson called 911 to report a drive-by shooting. Seattle Police Officer Michael Connors responded to the call, interviewed Tucker, and located a bullet hole on the passenger side of Tucker's car. Detective Benjamin Hughey interviewed Tucker on January 6, after reviewing a report prepared by Officer Connors. According to Tucker, he was alone in his car driving to Watson's house when he heard a popping noise. Tucker identified the shooter as Robert Isabel, the current boyfriend of Tucker's former girl friend.

The State charged Isabel with drive-by shooting and first degree unlawful possession of a firearm. During pretrial proceedings, Isabel claimed the State had failed to meet its obligation to disclose exculpatory evidence. In particular, he argued that a January 3 radio transmission, in which Officer Connors reported to police dispatch that he heard "conflicting stories" from Tucker, demonstrated that Officer Connors would provide potentially exculpatory testimony. Isabel asked the court to order the prosecutor to locate Officer Connors, who was no longer employed by the Seattle Police Department. Noting that the State properly disclosed the transmission but had no "obligation to hunt down potential Defense witnesses," the trial court directed the prosecutor to contact the Seattle Police Department and request Connors' last known address.

At trial, near the end of the day on a Thursday, one defense attorney cross-examined Tucker while his co-counsel sat at counsel table. After confirming that Tucker continued to Watson's house after the shooting, the following exchange occurred:

> Q. How far is Mr. Watson's house?
> A. Well, I can't tell you that, actually tell you where he lives at. Mr. Isabel's family has been threatening my friends and my family and my kids. So I can't tell you that.
> [Co-counsel]: Objection, Your Honor.
> THE COURT: What's your objection?
> [Co-counsel]: Nonresponsive.
> THE COURT: Ask another question.
> Q. Does Mr. Watson live in the general area of 23rd and Jefferson?
> A. He lives in the Central District. Yes, he does.
> Q. Does he live within one block of 23rd and Jefferson?
> A. I don't want to put this guy in danger.
> [Co-counsel]: Objection, Your Honor.
> THE COURT: You don't have to give the address.
> A. He lives – it's pretty much – I mean, you give the distance, I mean you can pretty much pinpoint where he lives.

> [Defense counsel]: Your Honor, I don't believe that Mr. Watson is going to be in any danger.
> [Co-counsel]: Objection, Your Honor. Can we have a sidebar, please? Can I have a moment, Your Honor?
> (OFF THE RECORD DISCUSSION)
> BY [Defense counsel]:
> Q. Can you give us an approximate distance from the intersection of 23rd and Jefferson to Mr. Watson's house?
> THE COURT: There's 360 degrees from that point. Are you trying to figure out how long it takes?
> [Defense counsel]: Yes, Your Honor. I'm trying to figure out how long it takes, the distance.
> THE COURT: From the point of the event, and if you were to drive to Mr. Watson's house, how long is it?
> A. 60 seconds.
> THE COURT: Go ahead.

A short time later, after the court excused the jury, the defense requested a mistrial based on Tucker's reference to threats from Isabel's family. When a dispute arose as to which attorney was questioning Tucker at the time he made the statement, the trial court advised the parties to obtain the relevant portion of the transcript by the next trial day.

On the following Monday, the defense again requested a mistrial, arguing that Tucker's unsolicited remark was so prejudicial as to deprive Isabel of a fair trial. After reviewing the relevant portions of the transcript, the trial court first noted the irregular procedure of one defense attorney questioning a witness while a second defense attorney interposed objections while seated at counsel table. Recognizing that Tucker's comment was nonresponsive, as identified by co-counsel as the basis for her objection, the trial court then reasoned:

> But there was no concurrent request to strike the answer or for me to perhaps tell the jury to disregard the statement, nothing. So at this point if someone had requested that, I could have corrected it at the time it occurred. But there wasn't any motion to do that.

> Further, the statement is not attributed necessarily to Mr. Isabel. It's attributed to Mr. Isabel's family. And presumably Mr. Isabel doesn't have 100 percent control of his family members.
>
> There was no motion in limine made to instruct the witness not to mention that, so there's been no motion in limine violated. I do not find it to be inherently prejudicial such that it requires a new trial.
>
> And at this point, I don't think it would be in the Defendant's interest to admonish the jury about it and bring it up again. So at this point I'm denying the motion for a mistrial, and I think we just need to move on.

On the next trial day, outside the presence of the jury, defense counsel advised the court that the State had not provided a forwarding address for Officer Connors. The prosecutor reported that he requested Connors' address from the Seattle Police Department as directed by the trial court, but had received no reply. The trial court offered to sign an order for the defense investigator to take to the precinct.

Officer Connors did not appear at trial. The trial court denied Isabel's request for a missing witness instruction.

The jury found Isabel guilty as charged. The trial court imposed a standard range sentence.

Isabel appeals.

II

Isabel first contends that the trial court erred by denying his motion for a mistrial. Describing Tucker's reference to threats as serious, inflammatory, and prejudicial, Isabel claims that the trial court "preemptively" and "inexplicably refused" "to either offer to admonish the jury or give a curative instruction,"

thereby "rendering any objection or request . . . futile at best," and denying his right to a fair trial.

Because the trial judge is in the best position to determine the impact of a potentially prejudicial remark, we review the trial court's decision to grant or deny a motion for a mistrial for an abuse of discretion. State v. Escalona, 49 Wn. App. 251, 254-55, 742 P.2d 190 (1987).

> In determining whether a trial court abused its discretion in denying a motion for mistrial, this court will find abuse "only 'when no reasonable judge would have reached the same conclusion.'" "The trial court should grant a mistrial only when the defendant has been so prejudiced that nothing short of a new trial can insure that the defendant will be tried fairly. Only errors affecting the outcome of the trial will be deemed prejudicial." In determining the effect of an irregular occurrence during trial, we examine "(1) its seriousness; (2) whether it involved cumulative evidence; and (3) whether the trial court properly instructed the jury to disregard it."

State v. Johnson, 124 Wn.2d 57, 76, 873 P.2d 514 (1994) (footnotes omitted) (quoting State v. Hopson, 113 Wn.2d 273, 284, 778 P.2d 1014 (1989)).

Isabel fails to address the trial court's assessment of the first factor articulated in Johnson, that of the seriousness of Tucker's remarks. As the trial court observed, Tucker did not attribute any threats to Isabel personally and there was no allegation that Isabel was responsible for the actions of unnamed family members. Thus, this situation differs from that presented in Escalona, wherein we held that a mistrial should have been declared after a witness improperly testified that the defendant had committed a crime in the past similar to the one with which he was charged. Here, Tucker's comments did not invite the jury to improperly infer that Isabel had acted in conformity with a criminal character as demonstrated by past conduct or that he was seeking to intimidate

witnesses. Cf. Escalona, 49 Wn. App. at 256 (citing State v. Saltarelli, 98 Wn.2d 358, 362, 655 P.2d 697 (1982)). Analysis of the first Johnson factor clearly supports the trial court's denial of Isabel's motion for a mistrial.

Furthermore, we disagree with Isabel's characterization of the trial court's analysis of the third Johnson factor. The trial court found that any potential prejudice resulting from Tucker's remarks could have been cured with an instruction had defense counsel requested one while Tucker was on the stand. Ignoring this finding, and without citation to relevant authority, Isabel claims that the trial court erred by denying him "the option" of seeking a curative instruction. But rather than refusing to consider a defense request for such an instruction following the motion hearing or entering a ruling as to Isabel's best interests, the judge herein merely offered her opinion as to the wisdom of revisiting the matter before the jury. To the extent that the defense attorneys disagreed with the judge's assessment of Isabel's best interests, it was their responsibility to request whatever curative instruction they thought necessary and obtain a ruling on the request. On this record, Isabel fails to demonstrate any abuse of discretion in the trial court's denial of his motion for a mistrial.

III

Isabel also argues that the trial court denied his right to present a defense by refusing to give a missing witness instruction regarding Officer Connors.

When its decision is based on a factual dispute, we review the trial court's refusal to issue a requested instruction for an abuse of discretion. State v. Walker, 136 Wn.2d 767, 771-72, 966 P.2d 883 (1998).

A missing witness instruction informs the jury that it may infer from a witness's absence at trial that his or her testimony would have been unfavorable to the party who would logically have called that witness. State v. Flora, 160 Wn. App. 549, 556, 249 P.3d 188 (2011). Such an instruction is proper where the witness is peculiarly available to one of the parties, Flora, 160 Wn. App. at 556, and the circumstances at trial establish that, as a matter of reasonable probability, the party would not have knowingly failed to call the witness "unless the witness's testimony would be damaging." State v. Davis, 73 Wn.2d 271, 280, 438 P.2d 185 (1968), overruled on other grounds by State v. Abdulle, 174 Wn.2d 411, 275 P.3d 1113 (2012). However, no inference is permitted where the witness is unimportant or the testimony would be cumulative. State v. Blair, 117 Wn.2d 479, 489, 816 P.2d 718 (1991). Nor is a party entitled to a missing witness instruction where the absence of the witness can be satisfactorily explained. Blair, 117 Wn.2d at 489 (citing State v. Lopez, 29 Wn. App. 836, 841, 631 P.2d 420 (1981)).

Here, the trial court did not abuse its discretion by refusing to give a missing witness instruction. Although Officer Connors formerly served as a member of the Seattle Police Department, nothing in the record indicates that he had a continuing "community of interest" with the police and the prosecutor at the time of Isabel's trial. Cf. Davis, 73 Wn.2d at 278. In fact, contrary to Isabel's speculation, nothing in the record indicates that the former officer was still appearing in court to testify in cases in which he had participated. Instead, the prosecutor repeatedly stated on the record that his office could not locate

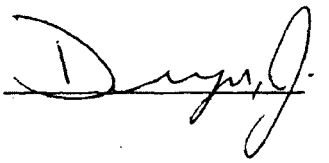
Connors and that the Department had not answered the prosecutor's requests for information.

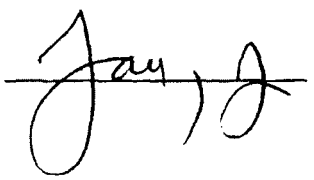
Moreover, Connors' testimony would have been cumulative. Detective Hughey testified that he noticed inconsistencies between Officer Connors' report of Tucker's initial statement and his own interview with Tucker. Detective Hughey also described Tucker's responses when confronted with the differing statements. Defense counsel also cross-examined Tucker about how his various statements to police and defense counsel conflicted with his testimony at trial. We reject Isabel's bald claim in his reply brief that Connors' testimony was critical to the defense case because of the "impeachment value of the jury hearing evidence presented by the witness who obtained it." As the trial court observed, Isabel failed to demonstrate that if Connors had appeared at trial, he "would testify to anything that would be helpful to the Defense."

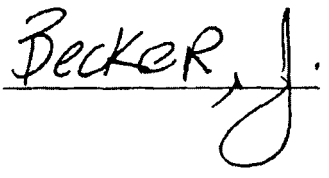
Because the State explained Connors' absence and his testimony would have been cumulative, Isabel was not entitled to a missing witness instruction.

Affirmed.

We concur:







DECLARATION OF FILING AND MAILING OR DELIVERY

The undersigned certifies under penalty of perjury under the laws of the State of Washington that on the below date, the original document **Petition for Review to the Supreme Court** to which this declaration is affixed/attached, was filed in the **Court of Appeals** under **Case No. 70462-1-I**, and a true copy was mailed with first-class postage prepaid or otherwise caused to be delivered to the following attorney(s) or party/parties of record at their regular office or residence address as listed on ACORDS:

☒ respondent Mafe Rajul, DPA
[PAOAppellateUnitMail@kingcounty.gov]
King County Prosecutor's Office-Appellate Unit

☒ petitioner

☐ Attorney for other party

MARIA ANA ARRANZA RILEY, Legal Assistant
Washington Appellate Project

Date: October 15, 2014

WASHINGTON APPELLATE PROJECT

October 15, 2014 - 4:37 PM

Transmittal Letter

Document Uploaded: 704621-Petition for Review.pdf

Case Name: STATE V. ROBERT ISABEL

Court of Appeals Case Number: 70462-1

Party Respresented: PETITIONER

Is this a Personal Restraint Petition? ○ Yes ◉ No

Trial Court County: ____ - Superior Court # ____

The document being Filed is:

- ○ Designation of Clerk's Papers ☐ Supplemental Designation of Clerk's Papers
- ○ Statement of Arrangements
- ○ Motion: ____
- ○ Answer/Reply to Motion: ____
- ○ Statement of Additional Authorities
- ☐ Affidavit of Attorney Fees
- ○ Cost Bill
- ○ Objection to Cost Bill
- ○ Affidavit
- ○ Letter
- ○ Copy of Verbatim Report of Proceedings - No. of Volumes: ____
  Hearing Date(s): _____
- ○ Personal Restraint Petition (PRP)
- ○ Response to Personal Restraint Petition
- ○ Reply to Response to Personal Restraint Petition
- ◉ Petition for Review (PRV)
- ○ Other: _____

Comments:

No Comments were entered.

Sender Name: Maria A Riley - Email: maria@washapp.org

A copy of this document has been emailed to the following addresses:

PAOAppellateUnitMail@kingcounty.gov