No. 91501-6
Court of Appeals No. 44963-3-II

THE SUPREME COURT OF THE STATE OF WASHINGTON

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STATE OF WASHINGTON,

Respondent,

v.

FAGALULU FILITAULA,

Petitioner.

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

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# PETITION FOR REVIEW

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## A. IDENTITY OF PETITIONER

Pursuant to RAP 13.4, Petitioner, Fagalulu Filitaula, asks this court to accept review of the opinion of the Court of Appeals in in *State v. Filitaula*, 44963-3-II.

## B. OPINION BELOW

On a December night, Faufau Boyd drove to the semi-rural home at which Mr. Filitaula was living. Ms. Boyd did so disregarding a no-contact order that prohibited Mr. Filitaula from having contact with her. Ms. Boyd did so because was angry at Mr. Filitaula. After she left, Ms. Boyd returned to the house a second time. Having done nothing more than remain at his rural home, Mr. Filitaula was arrested and charged for violating the no-contact order.

The Court of Appeals concluded this evidence was sufficient to establish Mr. Filitaula willfully violated the no-contact order. Further the court concluded there was no error where both the Information and to-convict instruction replaced the element that the violation be "willful" with a requirement it be "knowing."

## C. ISSUES PRESENTED

1. The Due Process Clause of the Fourteenth Amendment requires the State to prove each element of an offense beyond a

reasonable doubt. A conviction for violating a no-contact order requires the State prove a person willfully violated the order. In the absence of proof of that element does Mr. Filitaula's conviction deprive him of due process?

2. The Sixth and Fourteenth Amendments along with Article I, section 22 require the State prove each element of the offense beyond a reasonable doubt and that a jury find each element. This in turn, requires a trial court to instruct the jury on each element of the offense. Instruction 8, the "to convict" instructions, omitted the willfulness element. Does the instruction relieve the State of its burden of proof?

3. The Sixth and Fourteenth Amendments along with Article I, section 22 require the information contain all essential elements of the charged crime. Where the information omits the "willfulness" element, does it violate these constitutional requirements?

D. STATEMENT OF THE CASE

Because she was angry at something he had done, twice on the evening of December 16, 2012, Ms. Boyd went to Mr. Filitaula's home twice on the evening of December. RP 53-55. Ms. Boyd did so in disregard of the no-contact order which prevented Mr. Filitaula from have willful contact with Ms. Boyd. RP 54.

Mr. Filitaula was arrested and charged with violating the no-contact order. CP 6. At trial the State argued Mr. Filitaula was guilty because he did not flee his rural home into the night in an effort to avoid Ms. Boy's purposeful behavior. RP 154-56. A jury convicted Mr. Filitaula. CP 20-21.

E. ARGUMENT

**1. The opinion of the Court of Appeals transforms the offense into a strict-liability crime and merits review by this Court.**

A defendant may only be convicted if the government proves every element of the crime beyond a reasonable doubt. U.S Const. amend XIV; *Blakely v. Washington*, 542 U.S. 296, 300-01, 124 S. Ct. 2531, 159 L. Ed. 2d 403 (2004); *In re Winship*, 397 U.S. 358, 364, 90 S. Ct. 1068, 25 L. Ed. 2d 368 (1970). Due process "indisputably entitle[s] a criminal defendant to 'a . . . determination that he is guilty of every element of the crime beyond a reasonable doubt.'" *Apprendi v. New Jersey*, 530 U.S. 466, 476-77, 120 S. Ct. 2348, 147 L. Ed. 2d 435 (2000).

There are three essential elements of the offense of violating a no-contact order: (1) the willful contact with another, (2) the prohibition of such contact by a valid no-contact order, and (3) the

defendant's knowledge of the no-contact order. *State v. Clowes*, 104 Wn. App. 935, 944, 18 P.3d 596 (2001), *disapproved of on other grounds, State v. Nonog*, 169 Wn.2d 220, 237 P.3d 250 (2010);[1] RCW 10.99.050(2)(a). As to the first element, "not only must the defendant know of the no-contact order; he must also have intended the contact." *Id.* at 944-45; *State v. Washington*, 135 Wn. App. 42, 49, 143 P.3d 606 (2006). Evidence that a defendant who knew of a no-contact order accidentally or inadvertently came into contact with the alleged victim is insufficient to satisfy this element. *Clowes*, 104 Wn. App. at 945. To the contrary, "willful" requires a purposeful act. *State v. Sisemore*, 114 Wn. App. 75, 78, 55 P.3d 1178 (2002) (citing *State v. Danforth*, 97 Wn.2d 255, 258, 643 P.2d 882 (1982)).

The State did not prove Mr. Filitaula willfully violated the order. Mr. Filitaula did not act with the purpose of contacting Ms. Boyd. Instead, Mr. Filitaula is serving four years in prison because Ms. Boyd was intent on contacting him despite the order. Ms. Boyd went to the Mr. Filitaula's home not once but twice. RP 53, 55. Mr. Filitaula did nothing but remain at his home.

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[1] *Nonog* disapproved of the analysis of a challenge to the Information in *Clowes* which is not relevant to the argument made here.

The State argued, Mr. Filitaula was obligated to leave his home to avoid Ms. Boyd. RP 154-56. Echoing that argument, the Court of Appeals concluded Mr. Filitaula is guilty because he "did not attempt to terminate [Ms. Boyd' contact with him] by leaving or asking her to leave." Opinion at 3. Employing the Court's logic, the very act of asking her to leave would amount to willful conduct sufficient to support a conviction. Thus, Mr. Filitaula's only remedy was to literally flee his rural home into the dark of a winter night, because Ms. Boyd was intent on contacting him. That is an absurd requirement and is not required by nor consistent with the law. Mr. Filitaula did not act with the purpose of contacting Ms. Boyd and cannot be forced to flee his home to avoid conviction.

Because he did not willfully seek contact with Ms. Boyd, Mr. Filitaula cannot be convicted of the crime. The court's opinion fails to give substance to the willfulness requirement. Both the State and Court of Appeals employ logic which transforms the offense of violating a no-contact order into a strict liability offense. That presents a substantial constitutional issue by effectively eliminating an element of the offense. This Court should accept review under RAP 13.4.

**2. The opinion of the Court of Appeals regarding the omission of the "willfulness" element from the jury instructions is contrary to other opinions of the Court of Appeals and presents a significant constitutional question.**

"The Sixth Amendment provides that those 'accused' of a 'crime' have the right to a trial 'by an impartial jury.'" *Alleyne v. United States*, _ U.S. _, 133 S. Ct. 2151, 2156, 186 L. Ed. 2d 314 (2013). This right, together with the Fourteenth Amendment Due Process Clause, requires the State prove each element to a jury beyond a reasonable doubt. *Winship*, 397 U.S. at 364. A similar requirement flows from the jury-trial guarantee of Article I, section 22 and the due process provisions of Article I, section 3 of the Washington Constitution. *State v. Mills*, 154 Wn.2d 1, 6-7, 109 P.3d 415 (2005).

"A 'to convict' instruction must contain all of the elements of the crime because it serves as a 'yardstick' by which the jury measures the evidence to determine guilt or innocence." *State v. Smith*, 131 Wn.2d 258, 263, 930 P.2d 917 (1997). Therefore, "an instruction purporting to list all of the elements of a crime must in fact do so." *Id.* (citing *State v. Emmanuel*, 42 Wn.2d 799, 819, 259 P.2d 845 (1953)). A reviewing court may not to look to other jury instructions to supply a missing element from a "to convict" jury instruction. *State v. Sibert*,

168 Wn.2d 306, 311, 230 P.3d 142 (2010) (citing *Smith*, 131 Wn.2d at 262-63).

In *Clowes* the court reversed a conviction of violating a no-contact order because the to-convict instruction omitted the willfulness requirement and instead required the jury find only the defendant "knowingly violated the provisions" of the order. 104 Wn. App. at 943. That instruction mirrors the instruction at issue here.

Instruction 8, the to-convict instruction provides in relevant part:

> To convict the defendant of the crime of violation of a no contact order as charged, each of the following elements of the crime must be proved beyond a reasonable doubt:
>
> . . . .
>
> (3) That on or about said date, the **defendant knowingly violated a provision** of this order against a family or household member. . . .

CP 14. Willfulness, an intent to have contact, is an essential element of the offense. RCW 10.99.050(2)(a); *Clowes*, 104 Wn. App. at 944-45; *Washington*, 135 Wn. App. at 49. That element is missing from the instruction. *Clowes* plainly held this eror requires reversal.

Despite the fact that *Clowes* reversed the conviction for the precise error claimed here,[2] the court's opinion in this case actually

[2] In fact the error is bigger. In *Clowes* while the "to convict" instrcution substituted "knowledge" in lace of "willful," a separate instruction defining the

cites *Clowes* as affirming the substitution of willfulness with knowledge. Opinion at 4 (citing inter alia *Clowes* 104 Wn. App. at 944). But as is clear, *Clowes* said precisely the opposite.

The opinion of the Court of Appeals is contrary to the decision in *Clowes*. By permitting the substitution of "knowledge" in place of the statutory element of a "willful" violation, the opinion relieves the State of its burden of proving each element, and thus creates a significant constitutional issue. This Court should accept review.

**3. The Information omitted an essential element of the offense of willful violation of a no contact order.**

Article 1, section 22 and the Sixth Amendment prohibit the State from trying an accused person for an offense not charged. *State v. Pelkey*, 109 Wn.2d 484, 487, 745 P.2d 854 (1987). An offense is not properly charged unless the information sets forth every essential element of the crime, both statutory and nonstatutory. *State v. Kjorsvik*, 117 Wn.2d 93, 97, 812 P.2d 86 (1991). The charging document must contain: (1) the elements of the crime charged, and (2) a description of the specific conduct of the defendant which allegedly

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offense properly included "willful." The court reasoned that instruction could not remedy the error in the convict. In Mr. Filitaula's case, Instruction 7, which purports to define the offense, also omits willful and replaces it with "knowledge."

constituted that crime. *Auburn v. Brooke*, 119 Wn.2d 623, 630, 836 P.2d 212 (1992). "This doctrine is elementary and of universal application, and is founded on the plainest principle of justice." *Pelkey*, 109 Wn.2d at 488 (quoting *State v. Ackles*, 8 Wash. 462, 464-65, 36 P. 597 (1894)).

If an information is challenged for the first time on appeal, the Court must determine: (1) do the necessary facts appear in any form, or by fair construction can they be found, in the charging document; and, if so, (2) can the defendant show that he or she was nonetheless actually prejudiced by the inartful language which caused a lack of notice? *Kjorsvik*, 117 Wn.2d at 105-06. If the answer to the first question is "no," reversal is required without reaching the second question. *State v. McCarty*, 140 Wn.2d 420, 428, 998 P.2d 296 (2000).

Here the information does not allege Mr. Filitaula willfully violated the no contact order. The information provides in relevant part:

> Comes now the Prosecuting Attorney in and for Thurston County, Washington, and charges the defendant with the following crime(s):
>
> **COUNT I – FELONY VIOLATION OF POST CONVICTION O CONTACT ORDER/DOMESTIC VIOLENCE – THIRD OR SUBSEQUENT VIOLATION OF ANY SIMILAR ORDER, RCW 26.50.110(5) AND RCW 10.99.020 – CLASS C FELONY**

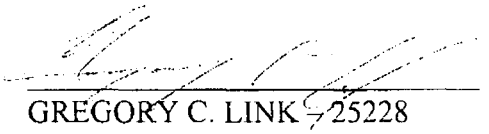
> In that the defendant,, FAGALULU FEAU FILITAULA, in the State of Washington, and on December 16, 2012, with knowledge that Grays Harbor District Court had previously issued a no contact order pursuant to Chapter 10.99 in Grays Harbor District Court on July 12, 2012, Cause No CR48176, did violate the order while the order was in effect by knowingly violating the restraint provisions therein pertaining to Faufau I. Boyd, a family or household member, pursuant to RCW 10.99.020 . . . .

CP 7 (Bold and underlining in original). As with the jury instructions, the information omits the essential element of "willfulness." That term does not appear in the charging document. Nor can it be fairly read into the charge. "Willfully contacting" another requires the person act with the intent to have contact. *Clowes*, 104 Wn. App. at 944-45; *Washington*, 135 Wn. App. at 49. A "knowing contact" would require nothing more than an awareness of the fact of contact regardless of any purpose to have such contact. Because the information was constitutionally defective, the conviction must be reversed and the case dismissed without prejudice. *McCarty*, 140 Wn.2d at 428

E. CONCLUSION

For the reasons set forth above, this Court should reverse Mr. Filitaula's sentence.

Respectfully submitted this 30th day of March, 2014.



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# IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

## DIVISION II

| | |
|---|---|
| STATE OF WASHINGTON,<br><br>Respondent,<br><br>v.<br><br>FAGALULU FEAU FILITAULA,<br><br>Appellant. | No. 44963-3-II<br><br>ORDER DENYING MOTION FOR RECONSIDERATION |

**APPELLANT** moves for reconsideration of the Court's **February 3, 2015** opinion. Upon consideration, the Court denies the motion. Accordingly, it is

**SO ORDERED.**

**PANEL:** Jj. Bjorgen, Maxa, Melnick,

**DATED** this 2 day of March, 2015.

**FOR THE COURT:**

Bjorgen, A.C.J.
ACTING CHIEF JUDGE

cc:
Carol L. La Verne
Gregory Charles Link

# IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

## DIVISION II

STATE OF WASHINGTON,

Respondent,

v.

FAGALULU FEAU FILITAULA,

Appellant.

No. 44963-3-II

UNPUBLISHED OPINION

MELNICK, J. — Fagalulu Filitaula appeals his conviction and sentence for violating a no-contact order, contending that insufficient evidence existed to support his conviction that the to-convict instruction and charging document omitted some elements of the offense, and that the trial court erred by imposing a term of community custody. Because the evidence is sufficient to show that Filitaula willfully violated the no-contact order, we reject his sufficiency challenge. Because the "to convict" instruction and the information alleged that Filitaula knowingly violated the no-contact order, we reject his challenges to those documents as well. Finally, because the combined total of Filitaula's exceptional sentence and the community custody imposed did not exceed the statutory maximum for his offense, we reject his sentencing challenge. We affirm.

## FACTS

On July 12, 2012, Filitaula signed a domestic violence no-contact order that prohibited him from having any contact with Faufau Boyd for a two-year period. Filitaula and Boyd had dated for eight years and had two children together. In December 2012, Boyd went to the residence of her cousin, Anna Hartman, to see Filitaula. Filitaula had been living at the Hartman home for a few months. Boyd wanted to confront Filitaula about being unfaithful. She knew about the no-contact order and the consequences of its violation.

After an initial conversation with Filitaula, Boyd left and then returned for an additional discussion. When Filitaula became angry, Boyd called her mother, who heard Filitaula yelling and cursing in the background. Boyd's mother called the police who arrested Filitaula at the Hartman residence.

The State charged Filitaula with felony violation of a no-contact order and added a bail jumping charge after he failed to appear for a pretrial hearing.[1] Boyd, her mother, the Hartmans, and a deputy prosecutor testified to the above facts. Boyd added that she and Filitaula talked for about 45 minutes, that they both knew about the no-contact order, and that Filitaula made no attempt to leave the house or go into a different room. Filitaula stipulated to two prior no-contact order violation convictions. The jury found him guilty as charged.

On appeal, Filitaula challenges only his conviction for violating the no-contact order.

## ANALYSIS

### I. SUFFICIENCY OF THE EVIDENCE

Filitaula initially argues that the State failed to prove that he willfully violated the no-contact order. We disagree.

"'The State must prove every element of a crime beyond a reasonable doubt for a conviction to be upheld.'" *State v. Sibert*, 168 Wn.2d 306, 311, 230 P.3d 142 (2010) (quoting *State v. Byrd*, 125 Wn.2d 707, 713, 887 P.2d 396 (1995)). To determine whether sufficient evidence supports a conviction, we view the evidence in the light most favorable to the State and determine whether any rational trier of fact could have found the elements of the crime beyond a reasonable doubt. *State v. Homan*, 181 Wn.2d 102, 105, 330 P.3d 182, 185 (2014). A claim of

[1] The no-contact order violation was charged as a felony because of Filitaula's two prior convictions for violating no-contact orders. RCW 26.50.110(5).

insufficient evidence admits the truth of the State's evidence and all reasonable inferences that can be drawn therefrom. *State v. Salinas*, 119 Wn.2d 192, 201, 829 P.2d 1068 (1992). Circumstantial and direct evidence are equally reliable. *State v. Delmarter*, 94 Wn.2d 634, 638, 618 P.2d 99 (1980). We defer to the trier of fact on issues of conflicting testimony, credibility of witnesses, and the persuasiveness of the evidence. *State v. Thomas*, 150 Wn.2d 821, 874-75, 83 P.3d 970 (2004).

Under RCW 10.99.050, a defendant commits the offense of violating a no-contact order when he willfully has contact with another, knowing that a no-contact order exists and prohibits the contact. *State v. Clowes*, 104 Wn. App. 935, 943-44, 18 P.3d 596 (2001), *disapproved on other grounds, State v. Nonog*, 169 Wn.2d 220, 237 P.3d 250 (2010). The offense has three essential elements: willful contact with another, the prohibition of such contact by a valid no-contact order, and the defendant's knowledge of the no-contact order. *State v. Washington*, 135 Wn. App. 42, 49, 143 P.3d 606 (2006) (quoting *Clowes*, 104 Wn. App. at 944). The element of willfulness requires a purposeful act. *State v. Sisemore*, 114 Wn. App. 75, 78, 55 P.3d 1178 (2002). Filitaula contends that the State did not prove that he acted willfully or purposefully because he simply remained at home when Boyd came over to confront him.

The fact that the protected party initiated the forbidden contact is not a defense to violating a no-contact order. *See* RCW 10.99.040(4)(b) and RCW 26.50.035(1)(c) (domestic violence protection orders must inform restrained person that he is subject to arrest even if protected party invites or permits contact); *State v. Dejarlais*, 136 Wn.2d 939, 942, 969 P.2d 90 (1998) (consent is not defense to charge of violating a domestic violence protection order). The evidence shows that Filitaula engaged in conversation with Boyd and did not attempt to terminate that conversation either by leaving or by asking her to leave. *See Sisemore*, 114 Wn. App. at 78 (defendant did not

violate no-contact order with accidental or inadvertent contact if he immediately broke it off). Because his conversation with Boyd was a purposeful act, we find the evidence sufficient to prove that Filitaula willfully violated the no-contact order.

II. ADEQUACY OF THE TO-CONVICT INSTRUCTION

Filitaula argues here that instruction 8, the "to convict" instruction, omitted the essential element of willfulness. We disagree.

A "to convict" instruction must contain all elements of the crime because it serves as a "yardstick" by which the jury measures the evidence to determine guilt or innocence. *State v. Smith*, 131 Wn.2d 258, 263, 930 P.2d 917 (1997). Instruction 8 informed the jury as follows:

> To convict the defendant of the crime of violation of a no contact order as charged, each of the following elements of the crime must be proved beyond a reasonable doubt:
>
> (1) That on or about December 16, 2012 there existed a no contact order applicable to the defendant regarding a family or household member;
>
> (2) That the defendant knew of the existence of this order;
>
> (3) That on or about said date, the defendant knowingly violated a provision of this order against a family or household member[;]
>
> (4) That the defendant has twice been previously convicted for violating the provisions of a court order; and
>
> (5) That the defendant's act occurred in the State of Washington.

Clerk's Papers (CP) at 14-15. Filitaula did not object to this instruction in the trial court, but he raises an issue of manifest constitutional error that may be reviewed for the first time on appeal. RAP 2.5(a)(3); *State v. Stein*, 144 Wn.2d 236, 240-41, 27 P.3d 184 (2001).

Instruction 8 refers to a knowing rather than a willful violation of a no-contact order. The requirement that an offense be committed willfully is generally satisfied if a person acts knowingly with respect to the material elements of offense. RCW 9A.08.010(4). Consequently, the substitution of "knowingly" for "willfully" in an instruction setting forth the elements of violating a no-contact order is not error. *Clowes*, 104 Wn. App. at 944; *see also Sisemore*, 114 Wn. App. at

78 (defendant acts willfully is he acts knowingly with respect to the contact element). But, such an instruction must inform the jury of the need to find both that the defendant knew of the no-contact order and that he intended the contact. *Clowes*, 104 Wn. App. at 944-45.

Instruction 8, which mirrors the pattern jury instruction, informed the jury that it had to find that Filitaula knew of the existence of the no-contact order and that he knowingly violated that order. 11 WASHINGTON PRACTICE: WASHINGTON PATTERN JURY INSTRUCTIONS, CRIMINAL 36.51.02, at 79 (3d ed. 2014). The "to convict" instruction in this case adequately set forth the essential elements of the crime of violating a no-contact order.

III. ADEQUACY OF THE CHARGING DOCUMENT

Filitaula argues next that the charging document was fatally flawed because it did not contain the willfulness element. Because an inadequate information raises due process concerns, Filitaula may raise this challenge for the first time on appeal. *State v. Kjorsvik*, 117 Wn.2d 93, 107-08, 812 P.2d 86 (1991). We disagree, however, with his claim of error.

A charging document is constitutionally adequate only if all essential elements of a crime are included so as to inform the accused of the charges and to allow him to prepare a defense. *State v. Vangerpen*, 125 Wn.2d 782, 787, 888 P.2d 1177 (1995). When a defendant challenges a charging document after the verdict, we construe it liberally in favor of validity. *Kjorsvik*, 117 Wn.2d at 105. Under that liberal analysis, we determine whether the necessary facts appear in any form, or by fair construction can be found, in the charging document; and, if so, whether the defendant shows that he was nonetheless actually prejudiced by the inartful language that caused a lack of notice. *Kjorsvik*, 117 Wn.2d at 105-06.

The charging document provided in pertinent part that Filitaula, "with knowledge that the Grays Harbor County District Court had previously issued a no contact order. . . did violate the

order while the order was in effect by knowingly violating the restraint provision therein pertaining to Faufau I. Boyd[.]" CP at 7. As stated above, a requirement that an offense be committed willfully is satisfied if the person acted knowingly. RCW 9A.08.010(4). Even if the substitution of knowingly for willfully can be characterized as inartful, we see no prejudice as a result. Filitaula does not show that his defense would have differed had the information charged him with willfully violating the no-contact order.

IV. COMMUNITY CUSTODY

Finally, Filitaula argues that the trial court violated RCW 9.94A.701(9) by imposing 12 months of community custody. We disagree.

RCW 9.94A.701(9) provides that a community custody term "shall be reduced by the court whenever an offender's standard range term of confinement in combination with the term of community custody exceeds the statutory maximum for the crime." The crime of felony violation of a no-contact order is a class C felony punishable by up to 60 months' confinement. RCW 26.50.110(5); RCW 9A.20.021(1)(c). Because Filitaula had an offender score of more than 9 points, his standard range was 60 months as well. RCW 9.94A.510, .515.

During sentencing, Filitaula argued that an exceptional sentence downward was appropriate because Boyd initiated the prohibited contact. *See* RCW 9.94A.535(1)(a) (victim's initiation of crime is mitigating factor). The trial court agreed and imposed an exceptional sentence downward of 48 months plus 12 months of community custody.

Filitaula now argues that the trial court erred by imposing 12 months of community custody because his total sentence could have exceeded the statutory maximum. He contends that RCW 9.94A.701(9) does not focus on the confinement actually imposed but on the confinement that is possible. According to Filitaula, whenever a defendant's standard range and term of community

custody could together exceed the statutory maximum, a reduction or elimination of community custody is required.

The State responds that RCW 9.94A.701(9) is irrelevant to Filitaula's sentence because the trial court imposed an exceptional rather than a standard range sentence. The Washington Supreme Court recently agreed and held that RCW 9.94A.701(9), by its terms, applies only to standard range sentences. *In re Pers. Restraint of McWilliams*, No. 88883-3, 2014 WL 7338498, *2 (Wash. Dec. 24, 2014).

Accordingly, we affirm the conviction and sentence for felony violation of a no-contact order.

A majority of the panel having determined that this opinion will not be printed in the Washington Appellate Reports, but will be filed for public record in accordance with RCW 2.06.040, it is so ordered.

Melnick, J.

We concur:

Bjorgen, A.C.J.

Maxa, J.

## 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. 44963-3-II,** 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 / residence / e-mail address as listed on ACORDS / WSBA website:

☒ respondent Carol la Verne, DPA
[Lavernc@co.thurston.wa.us]
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☒ petitioner

☐ Attorney for other party

MARIA ANA ARRANZA RILEY, Legal Assistant
Washington Appellate Project

Date: March 30, 2015

# WASHINGTON APPELLATE PROJECT

## March 30, 2015 - 4:09 PM

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Response to Personal Restraint Petition

Reply to Response to Personal Restraint Petition

■ Petition for Review (PRV)

Other: _____

**Comments:**

No Comments were entered.

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

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