

No. 47401-8-II

Pierce County #14-1-01026-7

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

STATE OF WASHINGTON,

Respondent,

v.

CHRISTOPHER J. REINHOLD,

Appellant.

ON APPEAL FROM THE
SUPERIOR COURT OF THE STATE OF WASHINGTON,
PIERCE COUNTY

The Honorable Garold E. Johnson, Judge

APPELLANT'S OPENING BRIEF

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A. ASSIGNMENTS OF ERROR

1. There was insufficient evidence to prove all of the essential elements of the crime of possession of a stolen motor vehicle.
2. The charging document was constitutionally insufficient as it failed to state all the essential elements of the crime of possession of a stolen vehicle.

B. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR

An essential element of the crime of possession of a stolen motor vehicle is that the defendant must “withhold or appropriate” the vehicle “to the use of any person other than the true owner or person entitled thereto.” Another essential element is that the defendant must know that the vehicle he was possessing was stolen.

1. Was the evidence insufficient to prove the essential elements of the crime where there was nothing about the appearance of the car which would have made a reasonable person know the car was stolen and the only evidence of guilty knowledge was Reinhold’s “failure” to explain his possession of the car ?
2. Was the charging document constitutionally insufficient for failing to include the essential “withhold or appropriate” element of the crime even when given liberal construction on appeal?

C. STATEMENT OF THE CASE

1. Procedural Facts

Appellant Christopher Reinhold was charged by corrected information in Pierce County Superior Court with first-degree unlawful possession of a firearm and unlawful possession of a stolen vehicle, both alleged to be aggravated because Reinhold was “under community custody at the time of the commission of the crime.” CP 1-2, 111-12; RCW 9A.56.068; RCW 9.41.040(1)(a); RCW 9.94A.525(19).

Pretrial continuances and other hearings were held before the

Honorable Judges Frank E. Cuthbertson and Jerry T. Costello on April 23, 2014 and January 8, 2015, after which jury trial was held before the Honorable Judge Garold Johnson on January 12-15, 20-22, 2015.¹ The jury found Reinhold guilty as charged. RP 540-57; CP 65-66. After a continuance, on March 27, 2015, Judge Johnson ordered Reinhold to serve a standard-range sentence. CP 131-43.

Reinhold appealed and this pleading follows. See CP 144-45.

2. Testimony at trial

Fife Police Department (“FPD”) officer Randall Fleming was patrolling an area of that town on March 14, 2014, at about 9:45 in the morning, when he decided to go to a local motel and conduct a “routine patrol check” of the parking lot. RP 262-64. Fleming explained that many Fife hotels were “high in, like, drugs, prostitution and, you know, vehicle prowls, vehicle thefts and stuff like that.” RP 264. The officer said it was “regular” for officers to conduct checks in hotel parking lots looking for “suspicious activity” and “stolen vehicles that may be dumped off in parking lots and stuff.” RP 265.

When he pulled into the Rodeway Inn parking lot, Officer Fleming saw a white Nissan Maxima. RP 264-65. The car was empty, but the officer ran a “check” using his in-car computer and his computer indicated

¹The verbatim report of proceedings in this case will be referred to herein as follows:

April 23, 2014, as “1RP;”
January 8, 2015, as “2RP;”
the chronologically paginated proceedings of January 12, 14, 15, 20, 21 and 22,
and March 27, 2015, as “RP;”
January 13, 2015, as “3RP;”
February 13, 2015 1-8, as “4RP.”

that the car was reported as a “stolen vehicle” in Tacoma. RP 265. Fleming then checked the vehicle identification number (“VIN”) and said it also matched the “stolen hit” that he had first received. RP 266. At that point, Fleming used his police radio to inform others of the suspected stolen car. RP 385.

FPD officer Michelle Butler arrived to help out. RP 384-85. Fleming then went to contact the front desk employees of the hotel in order to see if anyone had registered with the stolen vehicle’s license plate. RP 266-67. While there, Officer Fleming saw some monitors showing all sides of the hotel. RP 267-68.

Fleming admitted he could not “fully” see the Nissan from where he was, because there was a “brush-type tree blocking the entire car.” RP 268. The officer could still see that the vehicle was there, however, through the barrier of the tree. RP 267-68. From her vantage point, Butler admitted, she could not see the Nissan. RP 385.

It took the hotel clerk about five minutes to thumb through the registration cards and, at some point during that time, Fleming saw what appeared to be “several subjects” moving around the Nissan. RP 268. The officer could not see clearly enough to tell whether those moving around were men or women but thought it appeared that people were opening doors to the car. RP 268-69, 296. The officer could not tell, however, whether people were getting in or out or what was actually happening with the “constant movement around the vehicle.” RP 268-69.

Fleming called Butler on his radio, told her there was someone at the Nissan, got back in his patrol car and drove around the hotel towards

where the Nissan was parked. RP 269-70. Butler arrived at the car about the same time as Fleming. RP 386. Butler saw “several subjects” near the Nissan, including a woman standing in front of it and another woman nearby. RP 386.

As he pulled up, Fleming said, he saw a woman sitting in the passenger seat of the Nissan. RP 269. A man seemed to be climbing into the driver’s side front seat with the door closed. RP 269-70, 298. There was also another car parked next to the driver’s side of the Nissan and it appeared that there were people inside that, too. RP 270. The man Fleming saw getting into the driver’s side was later identified as Christopher Reinhold. RP 269-71.

Officer Fleming had pulled his car in at sort of an angle in order to make it so the Nissan would have to back up into Fleming’s patrol car to get out. RP 271-72. Although his patrol car was equipped with a camera, the officer said, at the time there were “technical difficulties” and the camera was not on.” RP 299.

Reinhold walked to the rear of the vehicle and, within a minute, officers had him in handcuffs. RP 274-75, 300. Officer Fleming admitted that the officer had his weapon drawn and assumed his partner did, too. RP 300. Reinhold did not resist and had no weapons on him when searched. RP 300. In contrast, police had to order the front passenger out. RP 274-75. She was later identified as Ms. Chappell. RP 301.

Reinhold was placed in the back of the Fleming’s patrol car and read his rights. RP 275. Officer Fleming then told Reinhold the Nissan had been reported stolen. RP 281-82. The officer admitted that Reinhold

seemed surprised by that news. RP 302-303.

Reinhold disputed the officer's declaration, saying the car was not stolen. RP 302-303. The officer then assured Reinhold the car had been reported stolen and started asking Reinhold questions about the car. RP 303. Reinhold said he had bought the car from someone named Ashley three days earlier. RP 275-76, 308, 320.

At trial, Officer Fleming was asked what information he was given about the registered owner of the car when he searched the records and he said that the name of the registered owner did not match the name "Ashley." RP 275-76. The officer also said Reinhold did not provide a "bill of sale," a title or vehicle registration and when asked said he did not have those items. RP 276. He did not have contact information for Ashley. RP 276. The officer opined that it seemed "odd" that someone would buy a car without knowing the seller. RP 276.

Another officer who was there, however, FPD Detective Thomas Gow, admitted he did not recall Reinhold being asked for a bill or sale or vehicle registration. RP 331-32. The detective's report reflected no such questions being asked. RP 332-33.

The officers said Reinhold also said something about a girl named Jennifer who might have reported the car stolen in an effort to get him in trouble. RP 281-82. Reinhold did not know Jennifer's last name or provide her contact information but said she was unhappy that he would not date her and might have been trying to get back at him. RP 281.

Officer Fleming conceded there was nothing about the physical appearance of the car which would indicate the car was in stolen. RP 293-

96. The license plates on the Nissan did not appear to be altered. RP 294-95. In fact, they were the registered plates for the car. RP 295.

The windows on the car were not damaged or broken. RP 295. The steering column was not “punched,” nor were there any markings or anything on the car which appeared altered or tampered with in any way. RP 295.

Reinhold had the keys to the Nissan in his pocket. RP 307. Officer Fleming admitted that, presumably, someone who has keys has “the right to use” the car. RP 310-11.

Officer Fleming said several bags and backpacks were found in the car and many of those were identified as belonging to Chappell. RP 301-302. In contrast, Detective Gow remembered, specifically, only one bag being found. RP 321-22. He clarified that he did not as a “matter of course do a complete inventory of everything” in a vehicle but just “what is of evidentiary value.” RP 333. Officer Butler confirmed that she took a total of five backpacks, bags or purses into evidence from the car that day. RP 389, 392.

Officer Fleming asked if Reinhold had any property in the Nissan and Reinhold said he did not. RP 284. The officer asked if there was anything in the car that police should know about and Reinhold said there was a handgun underneath the driver’s seat. RP 284. According to FPD officer Scott Green, Reinhold just “blurted” out that there was a gun in the car. RP 370-71. Reinhold said he was holding the gun in his hands when he saw the police cars coming around the side of the motel. RP 284-85. He got scared and dropped the gun under the seat, where Officer Fleming

saw it when he walked over and looked in the open car door. RP 304.

Reinhold told the officers that he had just found the firearm in the car when the police came around the side of the hotel. RP 321. The gun later recovered had five rounds and an officer said it fired when he tested it. RP 289-90, 323, 326. They found the owner of the gun through a pawn shop but she did not return their message. RP 306.

Officers did not recover any vehicle registration, insurance or sales documents anywhere in the car. RP 305. Gow testified that he would have searched for a registration and bill of sale in the car because “that would have been evidence of the crime that we were investigating[.]” Rp 334-35. At trial, the prosecutor elicited testimony from Officer Fleming that he did not find anything in the car with the names “Angela” or “Jennifer” on them (not “Ashley”) and that the officer did not have a “last name for Ashley to follow-up on” and did not have a phone number. RP 308-309. On cross-examination, however, Fleming admitted that he did not actually look at everything in the car, including many of the documents. RP 311-12.

The registration documents indicated that the owner of the car prior to March 1, 2014, was someone named Andrew Frickle. RP 347-48. The man who showed up at the police station and claimed to be the owner of the car, however, was named Lee Jackson. RP 388. Officer Butler testified that Jackson looked into the impounded car and said that a bunch of things inside were not his. RP 389.

The officer did not take anything from Jackson indicating that he was the owner before releasing the car to him. RP 392-93. As far as he

recalled, Jackson did not bring any such documentation. RP 392-93.

Jackson originally failed to appear to testify on the state's behalf, so the prosecution had to ask the court to grant a material witness warrant. RP 402-403. After being arrested, he testified for the prosecution that he had owned a white Nissan in 2014 and it was stolen on March 4. RP 439. According to Jackson, at that time, he had only owned the car for about ten days. RP 439. He had paid \$3,000 and bought the car at a used car dealership in Tacoma. RP 441-42.

Jackson could not say the name of the dealership where he purchased the Nissan. RP 444. He also did not remember the name of the person from whom he bought the car. RP 444-45. Jackson said the car was in his wife's name but not his. RP 445.

At trial, Jackson had no purchase agreement or bill of sale to prove that he owned the car. RP 445. He did not have a credit card receipt, either, as he paid cash. RP 446.

Jackson said he had been in his car, started it up with the keys and gone back inside to grab some trash. RP 440. When he came back outside, the car was gone. RP 440. Jackson said he had not given anyone permission to have his car. RP 442.

Jackson admitted he was not on the registration at the time the car was stolen, nor was his wife. RP 445-46. Someone else's name was still on the registration. RP 444-45. According to Jackson, the dealership had told him everything would be "all good to go and coming in the mail." RP 445.

D. ARGUMENT

1. THERE WAS INSUFFICIENT EVIDENCE TO PROVE ALL OF THE ESSENTIAL ELEMENTS OF THE CHARGED CRIME OF POSSESSION OF A STOLEN MOTOR VEHICLE

The state and federal constitutions guarantee the accused the due process right to have the prosecution prove every element of its case against him, beyond a reasonable doubt. In re Winship, 397 U.S. 358, 364, 25 L. Ed. 2d 368, 90 S. Ct. 1068 (1970); State v. Green, 94 Wn.2d 216, 221, 616 P.2d 628 (1980). Evidence is only sufficient to support a criminal conviction if, when taken in the light most favorable to the state, that evidence is sufficient to support a rational trier of fact finding all of elements as required. See, Jackson v. Virginia, 443 U.S. 307, 319, 99 S. Ct. 2781, 2789, 61 L. Ed. 2d 560 (1979). Where the prosecution fails to meet that burden, reversal and dismissal with prejudice is required. Id.

In this case, there was insufficient evidence to prove the essential elements of the unlawful possession of a stolen motor vehicle. Under RCW 9A.56.068(1), the definition of whether a person has committed the crime is circular, providing “[a] person is guilty of possession of a stolen vehicle when he “possesses . . . a stolen motor vehicle.” And a person commits possession of stolen property in general under RCW 9A.56.150(1) when they “knowingly. . . receive, retain, possess, conceal or dispose of stolen property knowing that it had been stolen and to withhold or appropriate the same to the use of any person other than the true owner or person entitled thereto.”

Thus, it is an essential element of the crime of possession of a

stolen motor vehicle is that the defendant must know that the car was stolen. More than mere possession of property which has been stolen is required. See State v. Womble, 93 Wn. App. 599, 604, 969 P.2d 1097 (1999). However, in some cases, possession of recently stolen property, together with slight corroborative evidence, will be sufficient. See State v. Couet, 71 Wn.2d 773, 775, 430 P.2d 974 (1967).

Thus, in State v. L.A., 82 Wn. App. 275, 918 P.2d 173 (1996), the evidence was insufficient to support a finding that the defendant knew the property was taken without permission of the owner. The owner testified the car was taken without his permission and officers saw L.A. driving the car the next day. 82 Wn. App. at 275-76. The officers followed her for a few blocks, then activated their emergency lights. After pulling over the car, officers saw a broken rear wing window. Id.

In reversing, the court of appeals held that “[i]n the absence of corroborative evidence such as a damaged ignition, an improbable explanation or fleeing when stopped,” the broken rear wing window and the fact that the owner said it was stolen was not sufficient to support the finding that the defendant had the required knowledge that the vehicle was stolen. Instead, the court found that the fact that L.A. was 14 years old when stopped and the rear wing window was broken were not sufficient to support the finding of the required “knowledge.” Id. at 277.

Here, the evidence is even more insufficient. There was no broken back window- there was no damage to the glass at all. There was no damage to the car, or the ignition. Indeed, nothing about the car would have led a reasonable person to believe just from looking at it that it was

stolen. And clearly the person who had sold Mr. Reinhold the car was in possession of the car keys, as those keys were given to Reinhold and in his possession at the time of the arrest.

Further, Officer Fleming admitted that Reinhold looked surprised when the officer told Reinhold the car was stolen.

The evidence was insufficient to prove the essential element of the crime that Mr. Reinhold knew that the car was stolen. Even taken in the light most favorable to the state, the prosecution failed to marshal sufficient evidence to prove Reinhold had the required knowledge. This Court should so hold and should reverse and dismiss the conviction with prejudice.

2. EVEN WITH LIBERAL INTERPRETATION, THE CHARGING DOCUMENT FAILED TO PROVIDE ALL THE ESSENTIAL ELEMENTS OF THE CRIME OF POSSESSION OF A STOLEN MOTOR VEHICLE

Under the state and federal due process clauses, the accused is entitled to sufficient notice of the charges against him, in order to provide him sufficient opportunity to prepare to meet the prosecution's case. State v. Johnson, 180 Wn.2d 295, 300, 325 P.3d 135 (2014). As a result, where the charging is done by filing of an "information," that document must meet specific requirements in order to comply with due process. State v. Kjorsvik, 117 Wn.2d 93, 109, 812 P.2d 86 (1991). If the charging document does not 1) contain all the essential elements of the charged crimes, and 2) give the defendant adequate notice of the charges and 3) protect the defendant against double jeopardy, it is constitutionally insufficient. Id. Any conviction gained as a result must be reversed and

the charge dismissed without prejudice. Id.

In this case, the information was constitutionally insufficient because it fails to set forth all the essential elements of the crime of possession of a stolen motor vehicle.

As a threshold matter, this Court applies de novo review to all challenges to the sufficiency of a charging document. See Johnson, 180 Wn.2d at 300. A charging document only meets that standard if “all essential elements of a crime, statutory and nonstatutory, are included in the document so as to apprise the accused of the charges against him or her and to allow the defendant to prepare a defense.” State v. Vangerpen, 125 Wn.2d 782, 787, 888 P.2d 1177 (1995).

The Court construes the charging document differently, however, depending on whether counsel raised a challenge to the document below or the sufficiency of the information is raised for the first time on appeal. See State v. Rivas, 168 Wn. App. 882, 887, 278 P.3d 686 (2012), review denied, 176 Wn.2d 1007 (2013). Where the challenge is not raised until appeal, the reviewing court will address the issue but construe the document “liberally.” See State v. McCarty, 140 Wn.2d 420, 425, 998 P.2d 296 (2000). Applying that standard, the Court asks whether the necessary facts appear in or can be found by fair construction of the charging document. Id.

That standard was not met here. Unlawful possession of a stolen vehicle requires proof that the defendant was in possession of stolen property. See State v. Satterthwaite, 186 Wn. App. 359, 361, 344 P.3d 738 (2015). A person possesses stolen property in general under RCW

9A.56.150(1) when they “knowingly. . .receive, retain, possess, conceal or dispose of stolen property knowing that it had been stolen and to withhold or appropriate the same to the use of any person other than the true owner or person entitled thereto.”

As a result, an essential element of the crime of possession of a stolen motor vehicle is that the defendant must “withhold or appropriate” the stolen item for use by someone who is not the true owner or “person entitled thereto.” Satterthwaite, 186 Wn. App. at 361. As this Court recently explained, the “withhold or appropriate” requirement is an essential element of possessing stolen property such as a car, because such conduct “is necessary to establish the very illegality of the behavior charged.” 186 Wn. App. at 364-65.

Thus, as this Court held in Satterthwaite, the “withhold or appropriate” requirement is an essential element of *all* of chapter RCW 9A.56 as it relates to possession of stolen property. 186 Wn. App. at 364-65. This includes the possession of a stolen motor vehicle. Id.

Even applying liberal interpretation to the charging documents in this case, the information was constitutionally insufficient. The charging documents accused Reinhold of unlawful possession of a stolen vehicle, as follows in relevant part:

That CHRISTOPHER JOHN REINHOLD, in the State of Washington, on or about the 14th day of March, 2014, did unlawfully and feloniously knowingly possess a stolen motor vehicle, knowing that it had been stolen, contrary to RCW 9A.56.068 and 9A.56.140. . .

CP 1-2, 111-12.

Nowhere in that allegation is the essential element that Reinhold

had to “withhold or appropriate” the car “to the use of any person other than the true owner or person entitled thereto.” Yet that is an essential element of the crime. See Satterthwaite, 186 Wn. App. at 361. And in fact, that essential element was submitted to the jury in the “to convict.” CP 82.²

Reversal is required. Where, as here, the information fails to set forth all of the essential elements of the crime and is thus constitutionally deficient, any conviction gained based on that information must be dismissed. Satterthwaite, 186 Wn. App. at 361-62. Further, the information itself must also be dismissed, without prejudice. See Johnson, 180 Wn.2d at 300.

The charging document failed to set forth all of the essential elements of the crime of possession of a stolen motor vehicle. This Court should so hold and should reverse the and dismiss the conviction and dismiss the charging document, without prejudice.

²The “to convict” instruction told the jury, in relevant part:

To convict the defendant of the crime of possessing a stolen motor vehicle, as charged in Count II, each of the following elements of the crime must be proved beyond a reasonable doubt:

(1) That on or about the 14th day of March, 2014, the defendant knowingly received, retained, or possessed a stolen motor vehicle;

(2) That the defendant acted with knowledge that the motor vehicle had been stolen;

(3) That the defendant withheld or appropriated the motor vehicle to the use of someone other than the true owner or person entitled thereto;

(4) That any of these acts occurred in the State of Washington.

CP 82-83..

E. CONCLUSION

For the reasons stated herein, this Court should reverse.

DATED this 12th day of February, 2016.

Respectfully submitted,

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CERTIFICATE OF SERVICE BY EFILING/MAIL

Under penalty of perjury under the laws of the State of Washington, I hereby declare that I sent a true and correct copy of the attached Appellant's Opening Brief to opposing counsel via this court's portal upload at Pierce County Prosecutor's Office, pcpateccff@co.pierce.wa.us, and appellant by depositing the same in the United States Mail, first class postage pre-paid, as follows: Mr. Christopher Reinhold, DOC 770024, MCC, P.O. Box 777, Monroe, WA. 98272.

DATED this 12th day of February, 2016.

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