Supreme Court No. 98568-5
COA No. 78863-9-II

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

v.

JOSHUA CASTILLO,

Petitioner.

ON APPEAL FROM THE SUPERIOR COURT
OF SKAGIT COUNTY

The Honorable David A. Svaren

PETITION FOR REVIEW

OLIVER R. DAVIS
Attorney for Petitioner

WASHINGTON APPELLATE PROJECT
1511 Third Avenue, Suite 610
Seattle, Washington 98101
(206) 587-2711

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A. IDENTITY OF PETITIONER

Joshua Castillo was the appellant in COA No. 78863-9-I.

B. COURT OF APPEALS DECISION

Mr. Castillo seeks review of the decision entered April 20, 2020 by Division One of the Court of Appeals. Appendix A (Decision).

C. ISSUES PRESENTED ON REVIEW

1. The prosecution did not prove the elements of the crime of robbery of a financial institution beyond a reasonable doubt. To convict the defendant for "robbery," the State was required to prove beyond a reasonable doubt that the perpetrator took property from a person, against her will, through the use or threatened use of immediate force, violence, or fear of injury to that person.

In this case, particularly considering the Court of Appeals' over-characterization of the actual facts adduced at trial, the evidence failed to prove robbery where a man, later claimed to be Joshua Castillo, entered the Skagit Bank. The man had no weapon, he never displayed anything that appeared to be a weapon, he uttered no threats, and he made no threatening gestures. He retrieved from his jacket a note – not a gun or a weapon - which read, "This is a robbery. Stay calm, don't draw attention to yourself, and give me $800." The teller, simply following her training to do so every time, gave the man $800 and he left the bank; Mr. Castillo was later

arrested and charged with being the perpetrator. These facts were insufficient to prove beyond a reasonable doubt that the man took the money through the use or threatened use of force. Must Mr. Castillo's conviction must be reversed and the charge dismissed with prejudice?

2. Did the State fail to prove the crime where the evidence, even when viewed in the light most favorable to the State, showed only that the man took money from the bank *in the presence* of the teller, but did not do so through the use or threatened use of force, violence, or fear of injury?

D. STATEMENT OF THE CASE

Mr. Joshua Castillo was charged with first degree robbery of a financial institution per RCW 9A.56.200(1)(b). CP 6-7. According to the affidavit of probable cause, on November 2, 2017, during the lunch hour, a man described as Hispanic entered the Mount Vernon branch of Skagit Bank, and handed the teller a note that "said something to effective [sic] this is a robbery stay calm give me $800." CP 4. Other than having "reached into his jacket" to retrieve the note, the man did nothing, and "said nothing," but merely left the bank after being handed eight $100 bills. CP 4; Exhibit 1 - bank security video; RP 141-43. He was seen "running west towards the river/edge water park." CP 4.

During a search and the establishment of a containment area by Mount Vernon police officers, a K-9 tracking dog located a leather coat

near the river which contained a food bank card with a number on it that was later identified as corresponding to one Joshua Castillo. RP 594-96; RP 334-35. Mr. Castillo was arrested the next morning at 2 a.m. RP 361-63.

With only "75 percent" confidence, teller Kelly Schwetz selected Mr. Castillo's photograph from a montage prepared by Detective Sergeant Mike Don, and shown to her by Officer Chris Pash. RP 578, RP 177; see RP 55, RP 575-79; Exhibits 4, 5 – photomontage documents. Eight months later, Schwetz testified at the August, 2018 trial that she was "100 percent" sure that the defendant, in court, was the person at the bank. RP 471-72.

Professor Stephen Ross, Ph.D., told the jury that he conducted a study with 38 participants who were provided information about the police investigation into Mr. Castillo's case, and shown the actual photomontage. Based on this study, the montage shown to Kelly Schwetz "was not an adequate test of the victim's memory." RP 492-95. In particular, "not all the fillers [photos of others] served as viable alternatives to the suspect" because they lacked crucial facial physical characteristics that had been described by Schwetz in the original police reports. RP 503-04.

However, following trial, the jury convicted Mr. Castillo. RP 790-95; CP 30, CP 32. He appealed, and the Court of Appeals affirmed the conviction. Appendix A.

E. ARGUMENT

This Supreme Court should accept review of this case because the Court of Appeals' decision was in error and any conviction based on this evidence violated the requirement that the State must prove the "threat" element of robbery beyond a reasonable doubt.

1. <u>This case fits the criteria for a Court of Appeals decision which this Supreme Court should accept review of, under RAP 13.4(b)(1), (2) and (3)</u>.

Review is warranted in this case where the Court of Appeals decision is contrary to decisions of this Court and the Court of Appeals decisions in <u>State v. Farnsworth</u>, 185 Wn.2d 768, 775-76, 374 P.3d 1152 (2016), and <u>State v. Shcherenkov</u>, 146 Wn. App. 619, 624-25, 191 P.3d 99 (2008). <u>See</u> RAP 13.4(b)(1), (2). The Court also erred in affirming the judgment contrary to the Due Process clause of the Fourteenth Amendment – which requires that the evidence be sufficient to allow a verdict of guilty before DOC could incarcerate Mr. Castillo. U.S. Const., amend. XIV; <u>Jackson v. Virginia</u>, 443 U.S. 307, 99 S. Ct. 2781, 61 L. Ed. 2d 560 (1979); RAP 13.4(b)(3).

This Court should take review of Mr. Castillo's case.

2. <u>Facts of issue</u>.

Ms. Kelly Schwetz was working the drive-through window at Skagit Bank on November 2, and helping out when needed at the bank's inside customer counters. RP 159-59. When a man entered the bank, other tellers

were busy so Schwetz welcomed him to her counter. RP 162-63. The man showed her a note which, Schwetz believed, said, "This is a robbery. Stay calm, don't draw attention to yourself, and give me $800." RP 165. The man uttered no words, or words of threat. RP 166. He had black latex gloves on his hands, which Schwetz described as "unusual." RP 166-67.

The man opened his coat and reached in for the note, and Schwetz said "Yes" when asked if this made her fearful. RP 167. The Court of Appeals, describing this act of reaching into his coat to be evidence of threat, places emphasis on erroneous descriptions of the conduct the man engaged in, and overemphasizes a non-threatening act merely retrieving a piece of paper with a note to place on the teller's counter.

The Court of Appeals also certainly failed to consider that Schwetz' subsequent actions were pre-determined by bank protocol, long before the man entered the bank and handed her a paper note. Schwetz said she followed bank protocol to give a person money, which was why she did what the man requested, in order to "keep everybody safe." RP 169.

Notably, in this context, when the prosecutor asked why the man reaching in his coat for the piece of paper made her, assumedly, fearful, Schwetz cited what she in fact did <u>not</u> see - Schwetz said, "I didn't know if he had a weapon." RP 167. As she narrated the video that was playing in

court (Exhibit 1), she said that it showed the man coming to her counter and then, "He is reaching in to show me the note." RP 167-68.

Yet the Court of Appeals describes this non-threatening conduct by the man as proving that Schwetz stated that she though the man did have a gun. Decision, at p. 2. This is wrong. The trial prosecutor asked if the man's act of reaching in his coat to retrieve the note was "when you thought he might have a gun," Schwetz said "Yes." RP 168. But Schwetz had not testified that she thought the man had a gun. She testified that she "didn't know if he had a weapon." RP 167. The prosecutor created testimony by the phrasing of a question. RP 167-78.

Schwetz also stated that she turned around to get money from her main window. RP 169. She said that she thought this "might upset him [the man]," so she turned back and said she was going to get her money drawer. RP 168. Schwetz stated that when she first turned around, she had "fear" because she was afraid that "he was going to be really angry that I was turning my back and walking away." RP 171. In other words, any fear arose simply because Schwetz conceived of what the man might do.

Schwetz did say that when she turned back to speak to the man, he appeared "[a]ngry." RP 171. But in fact, the other bank worker, Ms. Culp, admitted that she did not even notice the man's interaction with teller Schwetz until he left the bank – as Ms. Culp stated, Ms. Schwetz simply did

as she was trained, to give money to anyone who presents a paper note. 8/7/18RP at 269-71. There simply was no threat of violence.

3. Because there was no threat of violence, the Court of Appeals decision was contrary to the Washington cases, and requires review and correction by this Supreme Court.

The cases that the Court of Appeals compared to the present incident are readily distinguishable, because Mr. Castillo did not take property by use or threatened use, of force. Washington cases make clear that the use or threatened use of force is the essential element that distinguishes a robbery from a theft. State v. Farnsworth, 185 Wn.2d 768, 775-76, 374 P.3d 1152 (2016); RCW 9A.56.190; CP 24. Unlike a robbery, a theft does not require force. It is simply the wrongful taking of the property of another with intent to deprive him or her of such property. Id.; see RCW 9A.56.020(1)(a).

The Court of Appeals in this case failed to recognize that if no actual force is used, the State must prove the defendant used an explicit or implicit threat of bodily harm in order to induce the victim to part with the property. To threaten is to act affirmatively. Farnsworth, 185 Wn.2d at 776; RCW 9A.04.110(28) (defining "threat" as "to communicate, directly or indirectly the intent" to take certain action).

It is true that the Court applies an objective standard to determine whether an implicit threat was made. Farnsworth, 185 Wn.2d at 776. The question is whether "'an ordinary person in the victim's position could

reasonably infer a threat of bodily harm from the defendant's acts.'" Id. (quoting State v. Witherspoon, 180 Wn.2d 875, 884, 329 P.3d 888 (2014)). But robbery has never been divorced from the subjective actions taken by the defendant. See United States v. McCranie, 889 F.3d 677, 680 (10th Cir. 2018), cert. denied, 139 S. Ct. 1260 (2019) (intimidation requires a purposeful act that instills objectively reasonable fear of bodily injury).

The threat must be sufficiently serious and forceful to induce a reasonable person to part with the property. State v. Clark, 190 Wn. App. 736, 756-57, 361 P.3d 168 (2015), review denied, 186 Wn.2d 1009, 380 P.3d 502 (2016). The taking of the property must be "'attended with such *circumstances of terror,* or such threatening by *menace*, *word or gesture* as in common experience is likely to create an apprehension of danger and induce a man to part with property for the safety of his person.'" Witherspoon, 180 Wn.2d at 884 (quoting State v. Shcherenkov, supra, 146 Wn. App. 619, 624-25, 191 P.3d 99 (2008) (alterations in Shcherenkov)).

The Court of Appeals should not have agreed with the State's argument that Shcherenkov compares to this case. Decision, at p. 5. No rational jury could conclude that the man acted with "menace," as in that case. Instead, as noted, Schwetz said she followed bank protocol, which she had been trained to do long before the day of the robbery. RP 169.

The cases involve evidentiarily significant differences in the conduct of the perpetrator himself, and the robber in this case made no threat. See, e.g., United States v. Downing, No. CIV 18-1222-R, 2020 WL 1930453, at *2 (W.D. Okla. Apr. 21, 2020) (addressing argument of no threat or intimidation where paper note presented to teller was wrongly characterized as frighteningly saying "NO DIE Packs.").

The facts were not adequate in this trial. To convict Mr. for robbery, the threatened use of force was an essential element the State was required to prove beyond a reasonable doubt. In re Winship, 397 U.S. 358, 364, 90 S. Ct. 1068, 25 L. Ed. 2d 368 (1970); U.S. Const. amend. XIV; Const. art. I, § 3. The question on review as to Mr. Castillo's sufficiency challenge is whether a rational fact finder could have found the State proved the man committed this element beyond a reasonable doubt. State v. Green, 94 Wn.2d 216, 221, 616 P.2d 628 (1980); Jackson v. Virginia, supra, 443 U.S. 307, 99 S. Ct. 2781, 61 L. Ed. 2d 560 (1979).

4. The State did not prove that the man "induced" Schwetz to part with the $800 by using or threatening to use force.

"Inducement" is crucial to the crime of robbery. Here, too, the State failed to prove its case. The evidence is insufficient to sustain the robbery conviction because the State did not prove beyond a reasonable doubt that the man took money from Kelly Schwetz through a creation of fear that caused the money to be given. He merely entered the bank and showed

Schwetz a note. See, e.g., Witherspoon, 180 Wn.2d at 881 (where complainant discovered defendant beside her home and "[h]is left hand was behind his back [and when asked] he replied that he had a pistol," a rational jury could infer that Witherspoon made an implied threat of force)).

The State may not rely upon evidence that is "patently equivocal." State v. Vasquez, 178 Wn.2d 1, 8, 309 P.3d 318 (2013); State v. Salinas, 119 Wn.2d 192, 201, 829 P.2d 1068 (1992). In this case, the evidence is equivocal, at best. Notably, as to the paper note, Castillo said the man simply held up the note for her to read. RP 182. She was asked, "Okay. And you testified as to the contents of that note. There was no threat in that." (Emphasis added) RP 182. Schwetz answered, "to be honest, I didn't read the whole thing." RP 182. This is not a threat, nor a taking by threat that induced the handing over of money because of threat.

The Court of Appeals noted Mr. Castillo's argument that his case is quite different from Clark, but, without comment, appeared to deem it similar. Decision, at p. 5. The facts are not similar. An ordinary person in Schwetz's position could not reasonably infer an implicit threat to inflict bodily harm. The man merely told the teller, by a passive written note, to give him money. He made no threatening gestures. He uttered no threatening words. Schwetz gave him the money because that is how she was trained to respond. RP 169. Her automatic response to the man's

request is not sufficient to establish that he actually threatened to harm her if she did not give him the money and that such threat was the cause of the taking. See Clark, supra, 190 Wn. App. at 758-59 (sufficient evidence of implicit threat of force and inducement where defendant entered bank wearing black mask, "commanded" tellers not to push alarms, gave tellers a demand note, "commanded" tellers not to put dye packs in with the money, and "demanded more money" when they gave him only small bills).

The man in this case did not enter the bank with a complex facial disguise – as a robber well would – not did he utter any "commands." He made no gestures to even pretend he had a weapon. He did nothing to suggest to an objective, reasonable person that he would use violence if necessary to take the money. Because the State failed to prove an essential element of the crime, the conviction must be reversed and the charge dismissed. State v. Hummel, 196 Wn. App. 329, 359, 383 P.3d 592 (2016). The charge must also be dismissed, because the Double Jeopardy Clause bars retrial. Id.; Burks v. United States, 437 U.S. 1, 11, 98 S. Ct. 2141, 57 L. Ed. 2d 1 (1978); U.S. Const. amend. V.

F. CONCLUSION

The State failed to prove an essential element of the crime. This Court should grant review and the conviction must be reversed and the charge dismissed.

Respectfully submitted this 18th day of May, 2020.

/s Oliver R. Davis
Attorney for Petitioner
WSBA 24560
Washington Appellate Project – 91052
1511 Third Avenue, Suite 610
Seattle, WA 98101
Phone: (206) 587-2711
Fax: (206) 587-2710
Email: oliver@washapp.org

APPENDIX A

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

STATE OF WASHINGTON, Respondent, v. JOSHUA CASTILLO, Appellant.	No. 78863-9-I DIVISION ONE UNPUBLISHED OPINION

APPELWICK, J. — Castillo appeals his conviction for first degree robbery of a financial institution. He argues that the State failed to prove beyond a reasonable doubt that he took money through the use or threatened use of immediate force. We affirm.

FACTS

On November 22, 2017, Kelly Schwetz was working her shift as a bank teller at a Skagit Bank in Mount Vernon. Just before 1:00 p.m., she saw a man that she believed to be a customer enter the bank. There were no cars at the drive-through station she was working at, so she called the man over to a lobby window to help him. As he walked over to the window, Schwetz noticed that he was wearing a black trench coat and a black cowboy hat that prevented her from seeing his face very well. The man then lifted up his hands, at which point she noticed that he was wearing black latex gloves. Schwetz found this unusual and became concerned.

Her concern grew as the man opened his coat and reached inside. She thought that he might have a gun.

After reaching into his coat, the man showed Schwetz a note. The note stated, "'This is a robbery. Stay calm, don't draw attention to yourself, and give me $800.'" Schwetz felt terrified and started to turn around to go back to her drive-through station to get the money. She then realized that her turning around and walking away might upset the man. As a result, she turned back to explain to him that she had to go get the money from the drive-through station. The man appeared angry.

Once Schwetz returned to the window with the money, she tried counting the money out. In the event of a bank robbery, she had been trained to keep the transaction as normal as possible. However, the man grabbed the money from her before she could finish counting it. After he took the money, Schewtz immediately went to her boss and coworkers to report the robbery and call 911. A customer at the bank saw the man run out the door.

Police responded to Schwetz's call and set up a containment zone in an area around the bank in order to keep the suspect in that area. They used a K-9 track to determine the suspect's location. During the K-9 track, police located a jacket with a food bank card inside. The food bank card belonged to an individual named Joshua Castillo. The K-9 track eventually led police towards Edgewater Park. Police had made contact with Castillo on prior occasions in the Edgewater Park area. Based on the bank surveillance video and photographs, as well as the K-9 track leading to the jacket and food bank card, police believed that Castillo

was their suspect. At around 2:00 a.m. the next morning, Castillo was rescued from rising flood waters at Edgewater Park. He was then transported to Skagit Valley Hospital, where police later arrested him.

The State charged Castillo with first degree robbery of a financial institution.[1] A jury found him guilty. The trial court sentenced him to 12.5 years of confinement. Castillo appeals.

DISCUSSION

Castillo argues that the State failed to prove beyond a reasonable doubt that he took money through the use or threatened use of immediate force.

The sufficiency of the evidence is a question of constitutional law that we review de novo. State v. Rich, 184 Wn.2d 897, 903, 365 P.3d 746 (2016). Evidence is sufficient to support a conviction if, viewed in the light most favorable to the prosecution, it permits any rational trier of fact to find the essential elements of the crime beyond a reasonable doubt. State v. Salinas, 119 Wn.2d 192, 201, 829 P.2d 1068 (1992). "A claim of insufficiency admits the truth of the State's evidence and all inferences that reasonably can be drawn therefrom." Id. 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. Killingsworth, 166 Wn. App. 283, 287, 269 P.3d 1064 (2012).

[1] The State also charged Castillo with third degree assault of a law enforcement officer. The trial court later dismissed that charge.

A person is guilty of first degree robbery if "[h]e or she commits a robbery within and against a financial institution." RCW 9A.56.200(1)(b). The trial court instructed the jury that, to convict Castillo of first degree robbery, the State had to prove seven elements beyond a reasonable doubt. Among those elements, the State had to prove that "[t]he taking was against the person's will by the defendant's use or threatened use of immediate force, violence, or fear of injury to that person or to the person or property of another." The court further instructed the jury that "[a] threat to use immediate force or violence may be either express or implied."

"Robbery encompasses any 'taking of . . . property [that is] attended with such circumstances of terror, or such threatening by menace, word or gesture as in common experience is likely to create an apprehension of danger and induce a man to part with property for the safety of his person.'" State v. Shcherenkov, 146 Wn. App. 619, 624-25, 191 P.3d 99 (2008) (alterations and emphasis in original) (quoting State v. Redmond, 122 Wash. 392, 393, 210 P. 772 (1922)). We use an objective test to determine whether the defendant used intimidation. State v. Witherspoon, 180 Wn.2d 875, 884, 329 P.3d 888 (2014). Specifically, "[w]e consider whether an ordinary person in the victim's position could reasonably infer a threat of bodily harm from the defendant's acts." Id. "The controlling question is whether a jury could conclude that under the circumstances, a reasonable person would have felt sufficiently threatened to accede to the written demand to turn over the money." State v. Clark, 190 Wn. App. 736, 756, 361 P.3d 168 (2015).

Castillo argues that his actions did not constitute an implicit threat to inflict bodily harm because "[h]e merely entered the bank and showed Schwetz a note." He asserts that he "made no threatening gestures," he "uttered no threatening words," and Schwetz "gave him the money because that is how she was trained to respond." Thus, he states that Schwetz's "automatic response" to his request was not sufficient to establish that he actually threatened to harm her. He differentiates this case from Clark. There, Reynolds[2] entered a bank wearing black clothing, black gloves, and a black mask, and commanded two bank tellers not to push any alarm buttons. Clark, 190 Wn. App. at 759. He gave one of the tellers a note stating, "'No dye packs or transmitter.'" Id. He commanded the same teller "to not put any dye packs in with the money," and, after she gave him small bills, demanded more money. Id. at 760. This court held that this evidence was sufficient to support a finding that Reynolds obtained the money through force, violence, or fear of injury. Id. at 759-60. In contrast, Castillo states that he "uttered no words and made no gestures to suggest he had a weapon."

The State counters that the facts here are nearly identical to those in State v. Collinsworth, 90 Wn. App. 546, 966 P.2d 905 (1997), and Shcherenkov. In Collinsworth, the defendant entered banks on six separate occasions and verbally demanded money. 90 Wn. App. at 548-50. This court determined that, under the circumstances of the case, the fact that he did not display a weapon or overtly

[2] The State charged both Reynolds and Clark with first degree robbery. Id. at 747. Reynolds pleaded guilty to two counts of first degree robbery and one count of attempted first degree robbery. Id. at 747-48. The State then charged Clark by amended information as an accomplice to one of the attempted first degree robberies. Id. at 748.

threaten the bank tellers did not preclude a robbery conviction. Id. at 553. In each incident, the defendant "made a clear, concise, and unequivocal demand for money." Id. He also "either reiterated his demand or told the teller not to include 'bait' money or 'dye packs,' thereby underscoring the seriousness of his intent." Id. This court held that, "[n]o matter how calmly expressed, an unequivocal demand for the immediate surrender of the bank's money, unsupported by even the pretext of any lawful entitlement to funds, is fraught with the implicit threat to use force." Id.

In Shcherenkov, the defendant entered banks on multiple occasions and made written demands for money. 146 Wn. App. at 622-23. On three of those occasions, he handed a note to the bank teller that stated, "'This is a robbery.'" Id. This court held that sufficient evidence supported that the defendant's conduct implied a threat of immediate force. Id. at 628-29. It also noted that the evidence was even stronger than the evidence in Collinsworth. Id. at 628. It explained, "In three of the four robberies, Shcherenkov showed each bank teller a note explicitly stating that he was robbing them. The tellers reasonably interpreted this language to be threatening because robbery inherently involves a threat of immediate force." Id. at 628-29.

Like Collinsworth, Castillo made an unequivocal demand for the immediate surrender of the bank's money when he showed Schwetz a noted that stated, "'This is a robbery. Stay calm, don't draw attention to yourself, and give me $800.'" None of the evidence suggests that this demand was supported by even the pretext of a lawful entitlement to the funds. Schwetz felt terrified when Castillo

showed her the note. Like the bank tellers in Shcherenkov, it was reasonable for Schwetz to interpret the language in the note as threatening because robbery inherently involves a threat of immediate force. Viewing the evidence in the light most favorable to the State, a rational trier of fact could find that Castillo made an implied threat to use immediate force or violence when he demanded money from the bank. Accordingly, the evidence is sufficient to support his conviction.

We affirm.

Appelwick, J.

WE CONCUR:

Chun, J.

Andrus, A.C.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. 78863-9-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 Rosemary Kaholokula
[skagitappeals@co.skagit.wa.us]
[rosemaryk@co.skagit.wa.us]
Skagit County Prosecuting Attorney

☒ petitioner

☐ Attorney for other party

MARIA ANA ARRANZA RILEY, Legal Assistant Date: May 18, 2020
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