

FILED
SUPREME COURT
STATE OF WASHINGTON
9/21/2020 11:47 AM
BY SUSAN L. CARLSON
CLERK

NO. 98703-3

SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON, DEPARTMENT OF SOCIAL AND
HEALTH SERVICES, on behalf of

THOMAS J. WINTER

Respondent,

v.

MORRIS A. WINTER,

Appellant.

ANSWER TO MOTION FOR DISCRETIONARY REVIEW

ROBERT W. FERGUSON
Attorney General

PATRICIA L. ALLEN
Assistant Attorney General
WSBA #27109
Office of the Attorney General
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7045

I. INTRODUCTION

The Department of Social and Health Services (DSHS) must follow its statutory mandate to protect vulnerable adults from abuse, even when the abuser is a family member and even when a vulnerable adult does not have the cognitive capacity to maintain a position on the need for protection. The broad powers granted to DSHS by the Legislature include an ongoing ability to participate as a party in actions filed by the Department, unless the vulnerable adult is both capable of revoking consent and has actually revoked consent for action on their behalf.

In 2015, DSHS protected vulnerable adult Thomas Winter, a resident of a skilled nursing facility, who was so afraid that his brother, Morris Winter, would carry out threats to harm Thomas' dog that Thomas' medical conditions were adversely impacted by his stress.¹ Thomas gave consent to the Department to file a petition for a Vulnerable Adult Protection Order (VAPO) that would require Morris to relinquish control of the dog and refrain from any abusive or neglectful behavior towards Thomas. The VAPO was entered after notice to Morris, who was present at the hearing, and it lasted five years, until June of 2020. Morris did not seek a direct appeal from the VAPO order.

¹ For the sake of clarity, this answer refers to Thomas Winter and Morris Winter by their first names. No disrespect is intended.

After the VAPO had been in place for a year, Morris made two unsuccessful attempts to vacate it, filing alone in 2016 and with the participation of Thomas in 2017. Notably, in 2017 Thomas' capacity was fluctuating and in decline, to the point that Thomas' attorney at the hearing to vacate could not report to the court that Thomas had the ability to state a position or assist counsel in the VAPO matter.

Morris cannot meet the requirements of RAP 13.4(b). In *Winter v. Department of Social and Health Services*, 12 Wn.App. 2d 815, 460 P.3d 667 (2020), the Court of Appeals applied well-established principles to a highly fact-specific analysis that does not warrant discretionary review by this Court. Morris' Petition for Review should be denied.

II. ISSUES PRESENTED FOR REVIEW

Was the trial court within its discretion in denying the motion to vacate filed by Morris Winter and allegedly supported by Thomas Winter when RCW 74.34.163 required the trial court to act "as it deems necessary for the protection of the vulnerable adult" and there was no indication that Thomas Winter was either willing or able to join in the motion at the time it was heard?

III. COUNTERSTATEMENT OF THE CASE

In 2015, Morris kept Thomas' dog, Becky, in his home even after he learned that: 1) his brother Thomas was not happy with him keeping the dog, and 2) this unhappiness was causing Thomas stress that impacted his medical conditions of post traumatic stress disorder (PTSD), Parkinson's Disease, dementia, and anxiety. CP 1-33, 57-62. Reports indicated that Morris made threats to kill Becky after Thomas removed Morris as his power of attorney. CP 5, 8, 11-14.

It took entry of a Vulnerable Adult Protection Order against Morris on June 25, 2015 to get him to turn over Becky for care at another home chosen by Thomas, who lived in a care facility and could not personally care for the dog. CP 1-27, 128-31, 215-16. Morris did not appeal the VAPO, which required him to give up custody of Thomas Winter's dog and refrain from abusing, abandoning, neglecting or exploiting Thomas.² CP 129-30, 2321-2324.

After Morris relinquished Thomas's dog, the VAPO remained in place until June 25, 2020, to prohibit abuse, neglect or exploitation of Thomas. CP 129-30. The order did not contain any "no contact" provisions or other restrictions that would have prevented or interfered with a continued relationship between Thomas and Morris.

² The word "abandonment" was stricken from the order on July 28, 2016. CP 662.

In a separate cause of action, Thomas sued his brother and sister-in-law, Morris and Cheryl Winter, in September 2015³ for undue influence, duress, unjust enrichment, breach of fiduciary duty, intentional infliction of emotional distress and for an accounting, under King County Cause Number 15-2-22589-8 SEA. CP 590-97. The Department is not a party to this separate matter.

Despite the clear reliance in Thomas' separate lawsuit on the VAPO order, Morris sought no relief in the VAPO action until a year later, on June 24, 2016. CP 132-45, 590-97. Morris made claims under CR 60(b)(4), (b)(6), and (b)(11) that he should be relieved from the VAPO, stating that Thomas had recanted the statements about threats to his dog. CP 132-220. Both Thomas and the Department opposed Morris's Motion to Vacate the Vulnerable Adult Protection Order. CP 223-78. Morris's motion was denied, with the court finding that Morris did not have standing, that Thomas did not recant, and that Thomas had instead reconfirmed his prior statements made in 2015 regarding the mental abuse. CP 661-62.

Morris Winter made a second attempt to vacate the VAPO in 2017, this time with a joint motion signed by Thomas Winter's attorney. CP 1844-57. However, by 2017, evidence had accumulated that Thomas Winter was

³ The pleadings were signed on August 31, 2015, over a month past the appeal deadline of July 27, 2015 that pertained to the VAPO signed June 25, 2015. CP 590-97.

no longer able to independently consent to or withdraw consent for protection by DSHS. CP 1918, 2091-2106, 2134.

In March 2017, the court in Thomas' separate lawsuit appointed him a litigation guardian ad litem because he:

[C]an sometimes be capable of generally expressing his interests and guiding his attorney of record as to representation, but is in need of protection and assistance during times of incapacity and inability to express his interests, particularly when there is a dosage change in the medication provided to him as treatment for his Parkinson's disease.

CP 1918.

Also in 2017, Dr. Janice Edwards completed an evaluation of Thomas' family dynamics with his brother entitled, "Psychological Evaluation Vulnerability to Influence." CP 2098-2106. Dr. Edward's report found that Thomas was subject to the undue influence of his brother Morris, and that Thomas had been unduly influenced by Morris in financial transactions. CP 2098. Dr. Edwards' report was based on two meetings with Thomas in November 2016 and July 2017, her review of a former therapist's deposition, her review of a neuropsychology report, and four videos of interactions between Thomas and Morris. CP 2098. Dr. Edwards found a "subtle, but effective form of coercion," by Morris against Thomas. CP 2101. Dr. Edwards observed Thomas' Parkinson's disease and accompanying dementia, stating that they "... subject[] him to have little

defense against assertions that he had already agreed to [d]o something and just doesn't remember that event/agreement/contract." CP 2101.

Within days of Dr. Edwards' report, Thomas entered into a CR 2A agreement with Morris and Cheryl to settle his lawsuit against them. CP 1884-94. Among many other provisions, the agreement contains a provision that required Thomas to support vacation of the Vulnerable Adult Protection Order from June 2015. CP 1888. Morris and Thomas Winter brought a joint motion to vacate the Vulnerable Adult Protection Order pursuant to their CR 2A agreement in December 2017, citing RCW 74.34.163. CP 1844-1946.

The Department, a party since the VAPO request was filed in 2015, did not agree to vacate the Vulnerable Adult Protection Order and did not agree to vacate its substantiated finding of abuse against Morris. CP 2258-2264. Thomas had become increasingly vulnerable since the VAPO order was entered, and he was documented to have been influenced through 2017 by his brother Morris, meaning that Thomas required continued protection against abuse and neglect that he was not able to advocate for on his own. CP 1918, 2091-2106, 2258-2264, 2451-2452.

The Department's response included Dr. Edwards' report of undue influence. CP 2294-2302. In reply, Morris provided a report by Dr. Bennett Blum, who was critical of Dr. Edwards' methodology, but who did not meet

or interview Thomas. CP 1990-2020. Thomas submitted a declaration in support of the joint motion. CP 1922-26.

The 2017 application to vacate the Vulnerable Adult Protection Order was denied. CP 2435. At the hearing on the joint motion to vacate, Thomas did not express that he wanted to pursue the joint motion, instead speaking on financial issues that were not pertinent to the motion. CP 2128-2130. Thomas' attorney reported being unable to take specific direction from Thomas on the motion. CP 2129-30. The commissioner "didn't hear from [Thomas] an application this morning to vacate this order. As such, I am going to deny the relief requested." CP 2134. The commissioner explained: "And I'm going to point out that even arguendo that Thomas signed these pleadings earlier, it's not clear to me that he has the capacity to make that decision in this case today. And it's not clear to me that he wants that in this case today." CP 2134.

Thomas did not move to revise the commissioner's order denying the joint motion to vacate and did not participate in the motion for revision. Morris alone moved to revise the commissioner's denial of the application to vacate the Vulnerable Adult Protection Order. CP 2137-54. He argued that the court should have relied on Thomas' earlier declaration, even though Thomas' capacity was in serious question on the date of the hearing, and asserted that all requirements of RCW 74.34.163 had been met. CP

1918, 2098-2106, 2129-2130, 2137-2153. Morris Winter also questioned the Department's reliance on the expert evidence of undue influence. CP 2152.

The court denied Morris' motion for revision, agreeing with the commissioner that Thomas did not ask for vacation of the VAPO at the hearing and that he was apparently not capable of withdrawing consent or complying with the CR2A agreement from the separate matter. CP 2473-2474. Morris appealed. CP 2475.

The Court of Appeals, Division I, heard oral argument on this matter and produced a published decision affirming the trial court's decision to deny the motions to vacate in *Winter v. Department of Social and Health Services*, 12 Wn.App. 2d 815, 820, 460 P.3d 667 (2020). Within that decision, the Court of Appeals explained that: "[T]he court did not abuse its discretion or misinterpret the Abuse of Vulnerable Adults Act in denying the motions to vacate..." *Winter v. DSHS*, 12 Wn. App. 2d at 839. Morris' argument that a clear and convincing standard of proof applied to a decision to deny vacation of a VAPO was not accepted on appeal, and his arguments regarding RCW 74.34.163 were passed over by the Court of Appeals as irrelevant and insufficiently briefed. *Winter v. DSHS*, 12 Wn. App. 2d at 839-42. Morris now seeks discretionary review by this Court.

IV. ARGUMENT WHY REVIEW SHOULD BE DENIED

The motion for discretionary review should be denied because the petitioner fails to establish that any of the criteria in RAP 13.4(b) apply to this case. Morris' allegations of errors in the Court of Appeals decision are fact-specific and do not raise an issue of substantial public interest, nor do they implicate the state or federal constitution.

Trial courts are granted discretion in matters concerning the welfare of vulnerable adults, and while they must respect the vulnerable adult's right to make autonomous decisions consistent with their abilities, trial courts must also assess the extent of any impairments that may limit the ability of vulnerable adults to act protectively on their own behalf. RCW 74.34.130, RCW 74.34.135. The Department's role in these cases under RCW Chapter 74.34 is to fill in the gap between the needs of a vulnerable adult and the vulnerable adult's ability to meet those needs. *See, e.g.*, RCW 74.34.068 (allowing DSHS to report findings of investigation to care facilities or law enforcement); RCW 74.34.150 (allowing the DSHS to act for a vulnerable adult incapable of consent); RCW 74.34.170 (authorizing DSHS to petition for VAPO).

Although VAPO petitions are evaluated under the clear, cogent, and convincing evidence standard if contested by the vulnerable adult, that standard applies only to issuance of the VAPO, not to an examination of

whether a VAPO should be vacated under RCW 74.34.163. *Compare In re Knight*, 178 Wn. App. 929, 930-31, 317 P.3d 1068 (2014)(evaluating whether a VAPO should issue when an alleged vulnerable adult contests the petition) *with* RCW 74.34.163(Allowing the court to act as deemed necessary when an already adjudicated vulnerable adult moves to vacate a VAPO that is in effect). Because relief under RCW 74.34.163 is discretionary, as is the initial granting or denial of a VAPO, the trial court decision is entitled to substantial deference and should be upheld if it is not an abuse of discretion. *In re Knight*, 178 Wn. App. at 936.

Regarding the RCW 74.34.163 arguments forwarded by Morris, the Court of Appeals correctly dismissed the issue as insufficiently briefed. *Winter v. DSHS*, 12 Wn. App. 2d at 841-42. However, even if the briefing had been more substantial, it could not have explained away the discretion granted to the court to act on a motion to vacate “as it deems necessary for the protection of the vulnerable adult...” RCW 74.34.163. Morris’ attempts to ignore this statutory language in his argument highlights their lack of persuasive force. PFR at 8-9, 11-12.

Because the Court of Appeals applied well-understood review standards to Morris’ arguments under RCW 74.34.163, there is no rationale for review by this Court under RAP 13.4(b)(3) or (4).

A. RCW 74.34.163 Requires Trial Court Discretion In Evaluating Petitions to Vacate a VAPO

Vulnerable adults do not have the unqualified right to vacate a VAPO granted for their protection. RCW 74.34.163 grants the vulnerable adult, and *only* the vulnerable adult or the adult’s guardian, the opportunity to petition the court for relief from a VAPO, but retains discretion in the trial court to determine whether that relief will be granted:

Any vulnerable adult who has not been adjudicated fully incapacitated under chapter 11.88 RCW, or the vulnerable adult's guardian, at any time subsequent to entry of a permanent protection order under this chapter, may apply to the court for an order to modify or vacate the order. In a hearing on an application to dismiss or modify the protection order, *the court shall grant such relief consistent with RCW 74.34.110 as it deems necessary for the protection of the vulnerable adult*, including dismissal or modification of the protection order.

RCW 74.34.163 (emphasis added).

In this case, not only was the capacity of Thomas to request relief under RCW 74.34.163 placed in doubt by the evidence of a 2017 psychological evaluation, the misgivings of his own attorney, and Thomas’ inability or unwillingness to confirm at the hearing that he wished to vacate the order, but the trial court acted as it deemed necessary to protect Thomas, determining that the VAPO should remain in place. CP 2134. The trial court noted that “my focus is on how Thomas reviews it and views it today,” and indicated concern that Thomas’ focus was on the financial aspects, not

on vacation of the VAPO. CP 2134-2135. Thomas did state, “I don’t see how I ruined his [Morris’] name,” in reference to the VAPO. CP 2130.

There is no legal issue raised here by the trial court’s proper use of discretion under the statute. The focus remained, as appropriate under RCW 74.34.163, on the vulnerable adult and his wishes, not on Morris’s feelings of diminished reputation. The Court should not grant review under RAP 13.4(b)(4).

B. DSHS Involvement in the 2017 Motion to Vacate Was Authorized by Statute

Morris claims that because Thomas issued a written revocation of his consent for DSHS services, DSHS was precluded from opposing the 2017 motion to vacate, but this point is not well taken. PFR at 10-12. Not only was the alleged revocation of consent by Thomas long after DSHS became a party to the VAPO, but it was of dubious value given Thomas’ documented decline in the years since the VAPO was entered. CP 1918, 2098-2106. Furthermore, DSHS may act without the vulnerable adult’s express consent when the agency has “reason to believe” that the vulnerable adult “lacks the ability or capacity to consent.” 74.34.150.⁴

⁴ Morris claims that RCW 74.34.150 does not give the Department authority to participate in a motion to vacate a VAPO under RCW 74.34.163 because the statute mentions only RCW 74.34.110-.140. PFR at 3, 10. But a motion to vacate a VAPO necessarily involves RCW 74.34.110, which provides authority to file a VAPO in the first place and carry out litigation involved in that petition. RCW 74.34.110 is also cited within RCW 74.34.163.

As of the date that the motion to vacate the VAPO was heard, Thomas was unable to effectively participate, as shown by his off-topic statements and his attorney's report that they could not get reliable direction from him as a client. CP 2128-2133. DSHS had clear authority to continue participation in the case based on its long-standing party status and the multiple indications that Thomas was incapable of making rational choices on consent or representation. RCW 74.34.005, 74.34.150; CP 1918, 2098-2106, 2132-2133. This is consistent with the activity in Thomas' litigation against Morris, in which a litigation GAL was appointed to assist Thomas.⁵ CP 1918.

The trial court did not err by allowing DSHS to continue as a party in this VAPO proceeding under RCW 74.34.150. This Court should not accept review of this moot case in order to further discuss the clear statutory authority given to the agency in VAPO matters.

C. The Court of Appeals Correctly Used the Abuse of Discretion Standard in Affirming the Denial of Vacation

⁵ This appointment is an example of how business may still be transacted with a vulnerable adult, even if DSHS is providing them support. Morris' concerns in this regard, voiced at page 3 of his PFR, are misplaced, as the law provides legal mechanisms such as GALs and findings of incapacity to provide alternate decision makers when a vulnerable adult is no longer individually capable. *See, e.g.* RCW 11.88.010, RCW 4.08.060. Morris may claim that the CR2A agreement was not enforced, but Thomas complied with seeking to vacate the VAPO when he joined his brother's motion. Neither Thomas nor anyone else participating in a VAPO proceeding can contractually eliminate the trial court's discretion under RCW 74.34.163, which was the real reason that the VAPO was not vacated.

Vacating a VAPO requires a different standard than application of the law authorizing issuance of an order in the first place. RCW 74.34.163, the basis for the 2017 attempt to vacate the VAPO here, requires that any decision made by the court must be consistent with “protection of the vulnerable adult.” Morris erroneously seeks to impose the legal standard of a fully contested VAPO petition onto the analysis of RCW 74.34.163, with neither contextual support nor citation to relevant authority. PFR at 14. This attempt to greatly increase the burden on a discretionary decision of the trial court does not merit this Court’s consideration.

Morris claims that RCW 74.34.163 requires proof from the non-moving party that, at the time of the motion, there is support for the order by a clear and convincing standard of proof. PFR at 14. He bases this questionable legal theory on the case of *In re Knight*, 178 Wn. App. 929, 930-31, 317 P.3d 1068 (2014). *Id.* But the *Knight* case cannot be removed from its context, which is evaluation of the *granting* of a VAPO petition at the original hearing on such petition and over the objection of the person alleged to be a vulnerable adult:

We hold the standard of proof for proving whether the adult is a vulnerable adult in a case contested by the alleged vulnerable adult is clear, cogent, and convincing evidence...

Knight, 178 Wn. App. at 937-37. *Knight* neither analyzed nor applied RCW 74.34.163. *Id.*

Significantly, the *Knight* standard relates to determining whether an individual is a vulnerable adult who should be protected by a VAPO, something already established in this case by the time Morris sought vacation of the order. CP 129-30, 132-45. Morris is precluded at this point from arguing about how the VAPO was established, both because it is established that Thomas was a vulnerable adult who requested DSHS assistance in establishing the VAPO and because Morris did not timely appeal that original order. CP 129-30. The Court of Appeals was correct in rejecting Morris' collateral attack on the VAPO order.

Morris' arguments do not withstand scrutiny under the abuse of discretion standard because they have rested largely on the contested issue of whether Thomas in fact supported vacation of the VAPO. PFR at 7, 11; CP 2125, 2132, 2134. The superior court found based on substantial evidence in the record that Thomas did not or could not retract his consent. CP 2134-2135. This evidence included a recent evaluation by a psychologist who had met Thomas and studied his taped interactions with Morris, along with assertions by Thomas' attorney that he had fluctuating capacity and could not provide guidance for the representation on the date of the 2017 hearing. CP 1918, 2132-2133, 2098-2106. The Court of Appeals rightly found no abuse of discretion and rightly deferred to the trial court's weighing of the facts given the substantial evidence that Thomas

had neither recanted his allegations nor credibly moved to vacate the order. CP 1918, 2132-2133, 2098-2106; *Winter v. DSHS*, 12 Wn. App. 2d at 839-42.

RAP 13.4 (b)(3) provides no basis for review of Morris' incorrect legal arguments regarding denial of the motion to vacate, and review should be denied by this Court.

D. There Is No Constitutional Issue Raised By The Trial Court's Weighing Of Evidence In This Case

An order protecting a vulnerable adult is only entered after it is determined that the person involved is indeed vulnerable under the statutory definition and that they either consent or are afforded a trial on the petition. RCW 74.34.020(22), RCW 74.34.110. The VAPO in this case was based on consent, and once entered, it invoked the trial court's jurisdiction to protect Thomas, who is undisputedly a vulnerable adult, as provided by RCW Chapter 74.34. CP 128-31, 243-50. RCW 74.34.163 allows, but does not require, vacation of a VAPO when the vulnerable adult requests it, similar to other forms of protection orders, such as Domestic Violence Protection Orders. *See* RCW 26.50.130 (6) (Court "may" terminate DVPO on petition of protected person). The trial court considered, but rejected, Thomas' request to vacate the VAPO because it was not convinced that he

truly sought that relief. CP 2125- 2134. Thomas' autonomy was fully respected through this process and no constitutional violation occurred.

Morris argues, without the support of Thomas,⁶ that the decision not to vacate the VAPO in 2017 implicated Thomas' liberty and autonomy interests such that this Court should review the decision. PFR at 13-14. But he depends entirely on the *Knight* decision for this assertion, and cites to no specific constitutional provision of either the U.S. Constitution or the Washington State Constitution. *Id.* Furthermore, Morris makes the same error in asserting a constitutional violation as he does in claiming that the standard for vacating a VAPO was not met: he applies the standard for establishing a VAPO against the wishes of a vulnerable adult to the standard expressed in RCW 74.34.163 for vacating an already-established VAPO. *Id.* As explained above, the *Knight* case does not interpret RCW 74.34.163 because it does not deal with a VAPO established under appropriate procedure and with the consent of the vulnerable adult. *Knight*, 178 Wn. App. at 937-40. Morris cannot rely on this inapplicable case law to assert a vague constitutional violation in the trial court's unremarkable application

⁶ Morris' standing to raise the issue of Thomas' constitutional rights is questionable. *See, e.g. Blomstrom v. Tripp* 189 Wn.2d 379, 390, 402 P.3d 831 (2017) (Those raising constitutional rights must be personally impacted by the alleged constitutional violation). But even as an intellectual argument, Morris has not supported the theory that the application of RCW 74.34.163 in this case raises constitutional concerns. Pet. For Review at 13-14.

of RCW 74.34.163. He has not shown a reason under RAP 13.4(b)(3) for this Court to accept review.

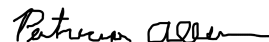
This case raises no legal issue sufficient to meet the standard for review by this Court, nor is it of constitutional magnitude. Neither DSHS nor other parties are in need of this Court's further guidance on the well-established principles dealt with by the Court of Appeals below. Review should be denied.

V. CONCLUSION

The motion for discretionary review does not meet the requirements of RAP 13.4(b), and the Department requests this Court deny review.

RESPECTFULLY SUBMITTED this 21st day of September, 2020.

ROBERT W. FERGUSON
Attorney General



PATRICIA L. ALLEN
Assistant Attorney General
WSBA# 27109
Office of the Attorney General
800 Fifth Avenue #2000
Seattle, WA 98104
(206) 587-4260

CERTIFICATE OF SERVICE

The undersigned certifies under the penalty of perjury under the laws of the State of Washington that on the below date, the original document to which this Declaration is affixed/attached, was filed in the Supreme Court, under Case No. 98703-3, and a true copy was e-mailed or otherwise caused to be delivered to the following attorneys or party/parties of record at the e-mail addresses as listed below:

1. Saphronia R. Young at saphronia.young@rm-law.com;
Ciana.christian@rm-law.com.

2. Morris A. Winter at mawinter@prodigy.net;

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

DATED this 21st day of September, 2019, at Seattle, WA.



NICK BALUCA
Legal Assistant

ATTORNEY GENERAL'S OFFICE, SHS, SEATTLE

September 21, 2020 - 11:47 AM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 98703-3
Appellate Court Case Title: Morris A. Winter v. DSHS, on behalf of Thomas J. Winter

The following documents have been uploaded:

- 987033_Answer_Reply_20200921114624SC819088_7034.pdf
This File Contains:
Answer/Reply - Answer to Motion for Discretionary Review
The Original File Name was AnswerDSHS_092120.pdf

A copy of the uploaded files will be sent to:

- Ciana.christian@rm-law.com
- jennib1@atg.wa.gov
- mawinter@prodigy.net
- saphronia.young@rm-law.com

Comments:

Sender Name: Nick Baluca - Email: nickb@atg.wa.gov

Filing on Behalf of: Patricia Lee Allen - Email: patricia.allen@atg.wa.gov (Alternate Email: shsseaf@atg.wa.gov)

Address:
800 Fifth Ave., #2000
Seattle, WA, 98104
Phone: (206) 464-7045

Note: The Filing Id is 20200921114624SC819088