Supreme Court No. 99178-2

Court of Appeals No. 52874-6-II

THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

v.

WILLIAM EDWARD MCGREW,

Petitioner.

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

PETITION FOR REVIEW

Kate Benward
Attorney for Petitioner

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

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Washington Supreme Court Decisions

Washington Court of Appeals Decisions

Statutes

Rules

Constitutional Provisions

Federal Court Decisions

A. IDENTITY OF PETITIONER

William Edward McGrew, petitioner here and appellant below, asks this Court to accept review of the Court of Appeals decision terminating review pursuant to RAP 13.3 and RAP 13.4(b)(1)-(4). The opinion and order denying reconsideration are attached as appendices 1 and 2.

B. ISSUES PRESENTED FOR REVIEW

1. The Sentencing Reform Act (SRA) does not permit confinement or its alternatives based on a person's financial status. A court may order electronic home monitoring (EHM) when certain statutory criteria are met, none of which require the ability to pay for this alternative to incarceration. Mr. McGrew met the criteria for EHM and the court ordered this alternative to incarceration, but only if he could pay for it in advance.

Should this Court accept review and reverse the trial court's sentence that confines a person based on their ability to pay, which is not authorized by the SRA and is a matter of substantial public interest in need of review by this Court? RAP 13.4(b)(1),(4).

2. There can be no equal justice where the kind of punishment a person receives depends on their wealth. Const. art. I, §12; U.S. Const. amend. XIV. The court determined that Mr. McGrew was eligible to serve his five-month sentence on EHM, rather than in jail, but only if he could pay for it. Does it violate equal protection to condition the terms of a defendant's sentence on his ability to pay for more lenient treatment? RAP 13.4(b)(3).

3. Though not argued by the prosecution on appeal, the Court of Appeals deemed the trial court's unambiguous sentence ordering Mr. McGrew to pay for EHM or report to jail, "insufficient for review," ruling that Mr. McGrew was required to first "bring a motion for the State to pay for his EHM before the trial court," without citation to any statute or legal basis under which Mr. McGrew would make such a motion. Appendix 1(Op. at 1). Was the Court of Appeals' decision declining review of Mr. McGrew's statutory and constitutional claim contrary to this Court's well-established case law that allows a defendant to pursue a pre-enforcement challenge to his sentence? RAP 13.4(b)(1)-(4).

C. STATEMENT OF THE CASE

William McGrew was given an antique brooch by an acquaintance who told him he had gotten it at an estate sale. RP 249. Mr. McGrew took it to a local antique store to sell it. RP 252. Unbeknownst to Mr. McGrew, the brooch had been reported stolen, and the antique store had been notified about it. RP 226.

Mr. McGrew was charged with trafficking in stolen property in the first degree and possession of stolen property in the second degree for trying to sell the brooch. CP 2. Mr. McGrew proceeded to jury trial where he was convicted only of the lesser offense of trafficking in stolen property in the second degree. CP 61-64.

With an offender score of one, Mr. McGrew's standard range sentence was three to eight months. CP 66. At sentencing, Mr. McGrew showed proof his employment at Burgers Landing and asked to serve his sentence on EHM. RP 406; CP 94-95. The victim of the theft got her brooch back and did not object to Mr. McGrew serving his sentence on EHM. RP 408. The court imposed a middle range sentence of five months, and allowed Mr. McGrew to serve his sentence on EHM, noting Mr.

McGrew's employment, and the fact that "jobs are not easy to get around here." RP 406; CP 67.

However, the court required Mr. McGrew to pay for EHM in advance to avoid incarceration. The court gave Mr. McGrew two days to arrange for payment, or he was required to report to jail for service of his sentence. RP 408; CP 67. Mr. McGrew then moved to stay imposition of his sentence pending appeal, which the court granted. RP 411-12.

On appeal Mr. McGrew challenged the portion of the court's sentence that ordered him to either obtain the money to pay for EHM in the next few days or serve his sentence in jail, arguing there was no statute authorizing a court to require advance payment as a basis for granting or denying EHM, and that this requirement of ability to pay when imposing a sentence violates equal protection because it gives different sentences to a person based on their wealth or poverty. Appendix 1 (Op. at 1).

The Court of Appeals declined to review Mr. McGrew's challenge to the court's sentence on a basis not argued by the State[1] or briefed by the parties, finding that "the record does not

[1] The State argued that the court cannot prevent a private monitoring company from requiring a fee to participate in the program, or alternatively,

contain any evidence that McGrew lacks the ability to pay for EHM," concluding from this that the issue was not properly before the court. Appendix 1 (Op. at 1).

Mr. McGrew sought reconsideration of the Court of Appeals decision, arguing that Mr. McGrew was entitled to make a pre-enforcement challenge to an illegal sentence that violates both the SRA and the Constitution.

The Court of Appeals called for a response from the State. The State did not respond. The Court ultimately denied Mr. McGrew's request for reconsideration. Appendix 2.

D. ARGUMENT WHY REVIEW SHOULD BE GRANTED

The trial court conditioned Mr. McGrew's jail sentence on his ability to afford an alternative to detention, a consideration not provided for by the Sentencing Reform Act and in violation of equal protection, which prohibits courts from sentencing a person based on wealth or poverty. This is a constitutional question of significant public interest in need of review by this Court. RAP 13.4(b)(1)-(4).

This Court should accept review and reverse the court's sentence that allowed Mr. McGrew to avoid service of jail time through the alternative of EHM only if he could afford it, contrary to the SRA and in violation of equal protection.

---

that this was invited error because Mr. McGrew requested EHM. Br. of Resp. at 4-6.

a. The SRA does not authorize a trial court to condition EHM on a defendant's ability to pay.

A trial court's sentence must be authorized by the SRA, which does not allow a trial court to sentence a person to partial confinement based on their ability to pay for it.

The SRA guides the sentencing court's exercise of its discretion. *State v. Shove,* 113 Wn.2d 83, 89, n. 3, 776 P.2d 132 (1989)). Courts do not generally "imply authority where it is not necessary to carry out powers expressly granted." *State v. DeBello,* 92 Wn. App. 723, 728, 964 P.2d 1192 (1998). Whether a trial court has exceeded its statutory authority is an issue of law that courts review independently. *State v. Hale*, 94 Wn. App. 46, 54, 971 P.2d 88 (1999).

The SRA provides that partial confinement is an alternative to total confinement for persons sentenced to one year or less. RCW 9.94A.680. "Partial confinement" may include work release, home detention, work crew, electronic monitoring, or any combination thereof. RCW 9.94A.030(36). By contrast, "total confinement" is confinement for 24 hours a day within a state institution imposed for sentences longer than one year. RCW 9.94A.030(52).

RCW 9.94A.734(4)(a)-(c) sets forth the conditions for home detention, which may require the offender to obtain or maintain employment, attend school, or parent full-time, abide by the rules of the home detention program and comply with court-ordered legal financial obligations.

Home detention is available as an alternative to confinement for only a narrow group of criminal defendants convicted of certain non-violent offenses. RCW 9.94A.734(1)-(3). The SRA prohibits a court from sentencing a defendant to home detention if the offender has previously and knowingly violated the terms of a home detention program and the previous violation is not a technical, minor, or nonsubstantive violation. RCW 9.94A.734(6)(a)(i) and (ii). A court has discretion to deny home detention when such a violation was merely technical, minor, or nonsubstantive. RCW 9.94A.734(6)(b).

The SRA also provides that the "home detention program must be administered by a monitoring agency that meets the conditions described in RCW 9.94A.736." RCW 9.94A.734(7). Nowhere does RCW 9.94A.736 or RCW 9.94A.734 require the defendant to pay the cost of home detention and prove that

payments are arranged in advance to receive this beneficial alternative to confinement.

The court determined that Mr. McGrew's standard range sentence of five months could be served through partial confinement on electronic monitoring. CP 67 (citing RCW 9.94A.030).

However, the court conditioned this sentence on Mr. McGrew's ability to pay for it:

> THE COURT: And the only reason I'm doing— normally, you'd just be taken into custody today, but typically it takes at least a few days to do the logistics of actually getting hooked up for EHM if you're able to set that up and able to afford it and able to coordinate it. So either jail or EHM by Friday, the 7th, at 4:00.

RP 407; CP 67.

The SRA's eligibility requirements for partial confinement on EHM do not include the ability to pay for the service. Indeed, conditioning partial confinement on one's ability to pay is contrary to the SRA's requirement of equal application of the guidelines to every offender in the State, and the SRA's prohibition of "discrimination as to any element that does not relate to the crime or the previous record of the defendant." RCW 9.94A.340. Moreover, it is contrary to the SRA's stated

purpose of ensuring proportionality in sentencing and providing just punishment commensurate with similarly situated defendants. RCW 9.94A.010(1)-(3).

The court exceeded its authority by sentencing Mr. McGrew to EHM conditioned on his ability to pay for it because this is not a basis provided in the SRA. This court should accept review and reverse this condition of Mr. McGrew's sentence.

b. Requiring Mr. McGrew to go to jail unless he can pay for an alternative to incarceration violates equal protection, which prohibits courts from using wealth or poverty as sentencing factors.

The trial court's sentence of five months in jail or alternatively, electronic home monitoring, but only if Mr. McGrew can pay for it, impermissibly imposes punishment based on wealth and poverty. Such considerations should have no place in a court's sentencing decisions. *United States v. Flowers*, 946 F. Supp. 2d 1295, 1300 (M.D. Ala. 2013).

Any sentence that subjects a criminal defendant "to imprisonment solely because of ... indigency" is constitutionally infirm and cannot stand. *Tate v. Short*, 401 U.S. 395, 398, 91 S. Ct. 668, 28 L. Ed. 2d 130 (1971). Equal protection and due process of law work to ensure the central aim of the criminal

justice system, which is to provide "equal justice for poor and rich, weak and powerful alike." *Griffin v. Illinois,* 351 U.S. 12, 16-17, 76 S. Ct. 585, 100 L. Ed. 891 (1956). This means that persons similarly situated with respect to the legitimate purpose of the law receive like treatment." *State v. Simmons*, 152 Wn.2d 450, 458, 98 P.3d 789 (2004); *Griffin,* 351 U.S. at 17 (*citing Chambers v. Florida*, 309 U.S. 227, 241, 60 S. Ct. 472, 84 L. Ed. 716 (1940)) (all people charged with a crime must be equal "before the bar of justice in every American court").

Equal protection analysis generally applies the rational basis test, requiring only that the policy be rationally related to a legitimate state purpose. *Petition of Fogle*, 128 Wn.2d 56, 62, 904 P.2d 722 (1995). However, denial of a liberty interest due to a classification based on wealth is subject to intermediate scrutiny. *Matter of Mota*, 114 Wn.2d 465, 474, 788 P.2d 538 (1990), *superseded by statute, Matter of Williams,* 121 Wn.2d 655, 662, 853 P.2d 444 (1993); *State v. Schaaf,* 109 Wn.2d 1, 17-18, 743 P.2d 240 (1987)). Under intermediate scrutiny, the state must prove the law furthers a substantial state interest. *Mota,* 114 Wn.2d at 474.

The United States Supreme Court interprets the Equal Protection Clause to prohibit courts from incarcerating defendants based on their ability to pay. *Tate,* 401 U.S. at 398-99; *see also Williams v. Illinois*, 399 U.S. 235, 242, 90 S. Ct. 2018, 26 L. Ed. 2d 586 (1970) (the statutory ceiling placed on imprisonment for any substantive offense must be the same for all defendants irrespective of their economic status); *Bearden v. Georgia*, 461 U.S. 660, 667-68, 103 S. Ct. 2064, 76 L. Ed. 2d 221 (1983) ("if the State determines a fine or restitution to be the appropriate and adequate penalty for the crime, it may not thereafter imprison a person solely because he lacked the resources to pay it").

In *Flowers*, the defendant was eligible to serve her sentence on home monitoring, but this option was only available if she could afford to pay for it herself. 946 F. Supp. 2d at 1298. Because the defendant could not afford this sentencing option, the government refused to recommend it at sentencing, and the court did not impose it. *Id.* at 1299.

As a matter of first impression, the *Flowers* court condemned the practice of allowing only those defendants who

"could cough up the money for monitored home confinement" to avoid prison. *Flowers,* 946 F. Supp. 2d at 1300. *Flowers* held that the "the Constitution's guarantee of equal protection is inhospitable to the Probation Department's policy of making monitored home confinement available to only those who can pay for it." *Id.* at 1302.

This Court similarly applied an equal protection analysis to ensure all those who served time on electronic home detention received jail time credit equally. *State v. Anderson,* 132 Wn.2d 203, 213, 937 P.2d 581 (1997). In *Anderson,* this Court ruled that "since the Legislature has chosen to grant jail time credit to those who serve pretrial electronic home detention … equal protection requires the same credit to be granted to those who serve electronic home detention after their conviction and pending their appeal." *Id. Anderson* noted that where the "*condition* of each group—being subject to electronic home detention" was identical, and "the *reasons* for placing a defendant from either group under electronic detention are indistinguishable," they must be treated equally. *Id.* (emphasis in original).

As in *Anderson,* Mr. McGrew's eligibility for EHM means that he shares the "condition" of any other person ordered to serve his sentence on home confinement, and the "reason" the court placed him on it is likewise indistinguishable from any other defendant. *Anderson*, 132 Wn.2d at 213. The only difference between Mr. McGrew and another person deemed eligible to serve his sentence on EHM is his ability to pay for it.

As in *Flowers,* this raises "serious constitutional concerns" because the court's sentence requires Mr. McGrew to pay for the cost of EHM or else serve his sentence in jail, which amounts to sending him to prison because he is poor. *Flowers,* 946 F. Supp. 2d at 1301. This distinction based on poverty does not survive rational basis review, much less intermediate scrutiny, because there can be no substantial state interest in allowing only those with financial means to avoid incarceration. *Mota,* 114 Wn.2d at 474.

In *Flowers* the court noted the particular unfairness of the government making a plea offer with the option of home detention, which shows the government did not believe incarceration was necessary, but then refused to recommend

home confinement at sentencing because the defendant could not pay for it. This result is even more stark in Mr. McGrew's case, where the court explicitly determined jail time was not necessary by ordering EHM, but only if Mr. McGrew could afford it, which impermissibly made his poverty a sentencing factor. 946 F. Supp. 2d at 1301-02.

The court's sentence that imprisons Mr. McGrew unless he is able to pay for partial confinement violates equal protection. This Court should grant review and remand for the court to sentence Mr. McGrew to serve his sentence on EHM regardless of his ability to pay.

c. The Court of Appeals' refusal to address these issues is contrary to this Court's decisions that allow for pre-enforcement review of an illegal sentence.

The Court of Appeals erred in determining that this statutory and constitutional challenge was not properly before the court.

The prosecutor did not advance the legal basis upon which the Court of Appeals denied Mr. McGrew relief. The Court of Appeals misconstrued Mr. McGrew's claim to be that "he is unable to pay the cost of EHM," and from this

mischaracterization, concluded that the record was insufficient for review without evidence about the cost of EHM, whether payment plans were available, or "whether McGrew was denied EHM on that basis or even attempted to find out such information from the monitoring agency." Appendix 1(Op. at 3). This focus on the cost of EHM and whether Mr. McGrew could in fact pay for it wrongly avoided the statutory and constitutional question squarely before the Court, which was whether such a condition of jail time based on one's ability to pay violates the SRA and equal protection.

The State did not defend the Court's decision denying Mr. McGrew review on this basis when called to do so in response to Mr. McGrew's motion to reconsider. The Court of Appeals' decision is indefensible because it is directly contrary to this Court's recognition that a defendant may challenge sentencing conditions that "apply uniquely to an individual defendant… as terms of his or her sentence, on the basis of claimed illegality." *State v. Bahl*, 164 Wn.2d 739, 751, 193 P.3d 678 (2008). Just as a person may bring a pre-enforcement challenge to community custody conditions or the length and terms of his sentence, here,

Mr. McGrew must be able to challenge the court's sentence that conditions his jail time on his ability to pay. This sentence is contrary to SRA and unconstitutional whether allowed for a wealthy defendant or imposed on a poor one.

The Court of Appeals erred in refusing to consider this matter of first impression regarding the statutory and constitutional legality of Mr. McGrew's sentence.

E. CONCLUSION

Because confining a person based on their ability to pay is not authorized by the SRA and violates equal protection, this Court should grant review and reverse this illegal sentence. RAP 13.4(b)(1)-(4).

Respectfully submitted this the 29th day of October 2020.

s/ Kate Benward
Washington State Bar Number 43651
Washington Appellate Project
1511 Third Ave, Ste 610
Seattle, WA 98101
Telephone: (206) 587-2711
Fax: (206) 587-2711
E-mail: katebenward@washapp.org

APPENDIX 1

Filed
Washington State
Court of Appeals
Division Two

July 21, 2020

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

DIVISION II

STATE OF WASHINGTON, Respondent, v. WILLIAM EDWARD MCGREW, II, Appellant.	No. 52874-6-II UNPUBLISHED OPINION

SUTTON, A.C.J. — William McGrew appeals his judgment and sentence after the trial court authorized him to serve his sentence on electronic home monitoring (EHM) and imposed a $100 DNA collection fee and a $200 criminal filing fee. For the first time on appeal, McGrew argues that (1) the trial court erred by conditioning EHM on his ability to pay for it because doing so violates the Sentencing Reform Act of 1981 (SRA),[1] (2) requiring that he serve time in jail because he did not have the ability to pay for EHM violates his right to equal protection, and (3) the trial court erred by imposing a $100 DNA collection fee and a $200 criminal filing fee.

Because McGrew failed to bring a motion for the State to pay for his EHM before the trial court, and the record does not contain any evidence that McGrew lacks the ability to pay for EHM, we hold that the SRA and equal protection issues are not properly before us on appeal, and we decline to reach the merits. We also hold that the trial court erred by imposing a $100 DNA

[1] Ch. 9.94A RCW.

collection fee and a $200 criminal filing fee. Thus, we remand and order the trial court to strike the $100 DNA collection fee and the $200 criminal filing fee, amend the judgment and sentence accordingly, and lift the stay on McGrew's sentence.

FACTS

McGrew was found guilty by a jury of trafficking in stolen property in the first degree. With an offender score of one, the standard range was three to eight months. At the sentencing hearing, McGrew requested that he serve his sentence by EHM rather than in jail. McGrew wanted to serve his sentence by EHM because he had recently gained employment working 28 hours per week, which paid $12.50 per hour. McGrew provided the court with proof of employment. The State opposed EHM because it had not verified McGrew's employment, and McGrew had not contacted any EHM private monitoring agencies to set up EHM. The State also noted that McGrew's wages may not cover the cost of the EHM fees.

The court sentenced McGrew to five months confinement and authorized that he could serve his sentence through EHM because "[McGrew is] employed and jobs are not easy for people to get around here." Verbatim Report of Proceedings (VRP) (Nov. 30, 2018) at 406. The court went on to say, "And perhaps people in your circumstances, dealing with the criminal justice system, they're even harder to get, so I'd like to give you at least an opportunity to keep that job and/or get additional work." VRP (Nov. 30, 2018) at 406-07. It ordered McGrew to either report to jail or be hooked up to EHM by December 7, 2018. It also imposed legal financial obligations (LFOs), including a $100 DNA collection fee and a $200 criminal filing fee.

After the court granted McGrew's request for EHM, McGrew's counsel advised him that he would be required to pay the EHM fees starting the following month. McGrew never filed a motion asking the court to order the State to pay for EHM, there is no evidence in the record establishing the amount of the EHM fees, and McGrew never argued to the trial court that he could not afford to pay the EHM fees.

McGrew filed a motion to stay his sentence pending appeal, which motion the court granted. McGrew appeals his judgment and sentence.

ANALYSIS

I. EHM

For the first time on appeal, McGrew argues that he is unable to pay the cost of EHM, that the court improperly conditioned the EHM on his ability to pay, and that this violates the SRA and his right to equal protection. We decline to reach the merits of these issues for the reasons discussed below.

"The party presenting an issue for review has the burden of providing an adequate record to establish such error." *State v. Sisouvanh*, 175 Wn.2d 607, 619, 290 P.3d 942 (2012); RAP 9.2(b). "An appellate court may decline to address a claimed error when faced with a material omission in the record." *State v. Wade*, 138 Wn.2d 460, 465, 979 P.2d 850 (1999). And we may refuse to review any claim of error not first reviewed by the trial court. RAP 2.5(a).

Here, McGrew states that he could only benefit from EHM if he was able to afford it. However, McGrew never raised this issue with the trial court, and thus, the court did not rule on this issue. Therefore, there is no trial court error for us to review.

We also decline to decide these issues because the record is inadequate. There is no evidence in the record before us that shows that McGrew was unable to pay for EHM. There is nothing in the record that shows what the EHM costs would have been, whether the monitoring agency had payment plans he could have used to make it more affordable, or whether McGrew was denied EHM on that basis or even attempted to find out such information from the monitoring agency. There is nothing in the record to affirmatively show that McGrew lacked the ability to pay the EHM fees. It is McGrew's burden on appeal to provide an adequate record for review, and he failed to do so.

Because McGrew never raised this issue at the trial court and because the record is inadequate for our review, we decline to reach the SRA or the equal protection issues.

II. LFOs

McGrew argues that the trial court erred by imposing a $100 DNA collection fee and a $200 criminal filing fee. The State concedes the error. We accept the State's concession and remand to the trial court with an order for the court to strike the $100 DNA collection fee and the $200 criminal filing fee and to amend the judgment and sentence accordingly.

CONCLUSION

We decline to reach the merits of McGrew's SRA and equal protection claims. But we remand with an order for the trial court to strike the $100 DNA collection fee and the $200 criminal filing fee, amend the judgment and sentence accordingly, and lift the stay on McGrew's sentence.

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.

Sutton, A.C.J.
SUTTON, A.C.J.

We concur:

Glasgow, J.
GLASGOW, J.

Cruser, J.
CRUSER, J.

APPENDIX 2

Filed
Washington State
Court of Appeals
Division Two

September 30, 2020

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

DIVISION II

STATE OF WASHINGTON, Respondent, v. WILLIAM EDWARD McGREW, II., Appellant.	No. 52874-6-II ORDER DENYING MOTION FOR RECONSIDERATION

Appellant moves for reconsideration of the opinion filed July 21, 2020, in the above entitled matter. Upon consideration, the Court denies the motion. Accordingly, it is

SO ORDERED.

PANEL: Jj. SUTTON, GLASGOW, CRUSER

FOR THE COURT:

Sutton, A.C.J.

SUTTON, 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 – Division Two** under **Case No. 52874-6-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 or residence address as listed on ACORDS:

☒ respondent Julian St. Marie
[jstmarie@co.jefferson.wa.us]
Jefferson County Prosecuting Attorney

☐ petitioner

☐ Attorney for other party

MARIA ANA ARRANZA RILEY, Legal Assistant Date: October 29, 2020
Washington Appellate Project

WASHINGTON APPELLATE PROJECT

October 29, 2020 - 4:23 PM

Transmittal Information

Filed with Court:	Court of Appeals Division II
Appellate Court Case Number:	52874-6
Appellate Court Case Title:	State of Washington, Respondent v. William Edward McGrew II, Appellant
Superior Court Case Number:	18-1-00155-8

The following documents have been uploaded:

- 528746_Petition_for_Review_20201029162312D2225085_4393.pdf
  This File Contains:
  Petition for Review
  The Original File Name was washapp.102920-09.pdf

A copy of the uploaded files will be sent to:

- jstmarie@co.jefferson.wa.us

Comments:

Sender Name: MARIA RILEY - Email: maria@washapp.org
Filing on Behalf of: Kate Benward - Email: katebenward@washapp.org (Alternate Email: wapofficemail@washapp.org)

Address:
1511 3RD AVE STE 610
SEATTLE, WA, 98101
Phone: (206) 587-2711

Note: The Filing Id is 20201029162312D2225085