NO. 994757

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,
Respondent,

v.

MATTHEW STEVEN JOHNSON,
Petitioner.

STATE'S RESPONSE TO PETITION FOR REVIEW

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BY: 

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TABLE OF CONTENTS

TABLE OF AUTHORITES

Supreme Court Cases

Court of Appeals Cases

Statutes

Rules

Other Authorities

Decision Below

I. RESTATEMENT OF THE ISSUES

1. Did the State present independent proof to establish a *prima facie* showing of the *corpus delicti* of the charged offense when multiple witnesses observed petitioner in his vehicle jutting straight out into traffic, perpendicular to the fog line, with the front half of the vehicle obstructing the lane of travel on a busy divided highway, such that his statement to police that he was backing into his driveway from the shoulder may be considered by the court in determining guilt?

2. Did the State present sufficient evidence to prove beyond a reasonable doubt that petitioner was the proximate cause of injuries sustained by a motorist when she struck the back of a truck that had stopped suddenly due to the petitioner's vehicle obstructing the lane of travel on a busy highway when the injured motorist testified that she was paying full attention to her driving, going the speed limit, saw the petitioner's vehicle on the side of the road, became alert to it, and even tapped her brakes before the truck in front of her suddenly stopped, such that the trial court correctly found her failure to stop did not constitute an intervening cause because no evidence indicated she drove negligently, too close, or did anything other than reasonably react when confronted with an emergency?

3. Should the Petition for Review be granted when there has been no showing that the decision of the Court of Appeals is in conflict with a decision of the Supreme Court, with a published decision of the Court of Appeals, or involves an issue of substantial public interest that should be determined by the Supreme Court?

II. COUNTERSTATEMENT OF THE CASE

At all times relevant herein the petitioner, Michael Johnson, lived near the Lemay transfer station along State Route 12 east of Aberdeen.

That property has a driveway access to Highway 12. In that area State Route 12 is "two lanes each direction, separated with cement jersey barriers, fully marked, dashed center line separating the two westbound lanes, a painted fog line, and then a paved shoulder wide enough to park a car on, in most locations in that area." RP 40. That area has no visual obstructions and is lit.

On the night of October 6, the petitioner was driving his white 1997 Chevrolet Cavalier registered to him RP 44. Tyler Newport, driving his pickup truck, a Ford F-350, westbound on Highway 12 from Montesano to Aberdeen with his girlfriend, Hanna Himley, in the passenger seat. RP 13. Both were paying attention with no distractions in the car. RP 14. Mr. Newport drove in the right hand lane at the speed limit of 50 miles per hour. RP 14-16.

It was about 7 p.m. on a Thursday, still light out, with some sprinkling rain, but "not wet enough to cause a problem." RP 22.

A red truck directly in front of Mr. Newport in the same lane flashed its brake lights flashed and then "jumped" abruptly, without signaling, into the left hand lane. RP 14-17. Once that truck was in the other lane Ms. Himley could see the petitioner's car pulled half way into the lane of travel. She said, "The nose of the car was in the lane almost

perpendicular to the white shoulder stripe. And the white shoulder stripe was about mid-way between the front and the back of the car. So, the car was half way of the car length into the lane." RP 17. Upon seeing the white car, Mr. Newport slammed on his brakes. RP 14.

Because the petitioner's car was in the lane of travel, causing Mr. Newport to suddenly bring his truck to a stop, the vehicle behind him was also faced with a sudden emergency.

Ms. Barnes, driving her 2003 Ford Ranger behind Mr. Newport, actually saw the petitioner's car "out of the corner of [her] eye" as she proceeded along Highway 12, a route she has taken countless times. RP 26-27. She also was paying full attention, driving without any distractions. RP 27. She saw the petitioner's vehicle but "couldn't tell if it was moving or if it was backing up or what, but it was out there so close to [but not in] the highway that it was a concern … it was out there very close to the line, edge of the highway, if not over it." RP 27-28. She covered her brakes, tapped them and looked back at the highway, glancing back in her mirrors. RP 28-29. With her brakes tapped (she could not remember if she could fully apply them) she collided with Mr. Newport's truck. RP 27-28.

Ms. Barnes sustained a laceration above her eye that bled "very much" and a fractured kneecap (patella). RP 29-30.

At trial, the petitioner stipulated that Ms. Barnes' injuries constituted substantial bodily harm, and that the collision caused them. RP 5.

Washington State Patrol Trooper Matt Rabe responded to the scene. Trooper Rabe had been a collision technical specialist for ten years at that point. RP 36. He was Field Training Officer to another, Trooper Ford. RP 37. Mr. Johnson explained to Trooper Rabe why Mr. Newport had needed to slam on his brakes—"he had pulled on to the shoulder of State Route 12, was backing into his driveway, and he heard brakes screeching" RP 47. He told Trooper Rabe he believed the collision was Ms. Barnes's fault, not his. RP 50.

The State charged Mr. Johnson with one count of vehicular assault, alleging he "did drive or operate a vehicle with disregard for the safety of others and caused substantial bodily harm to Marilyn J. Barnes." CP 33. Mr. Johnson proceeded to a bench trial in front of Judge David Edwards. CP 29. At trial defense counsel objected to any of petitioner's statements being admitted into evidence based upon *corpus delicti.* RP 32, 46-47; the court agreed to treat it as a continuing objection. RP 47. Defense counsel renewed the objection as a motion to dismiss at the conclusion of the state's case, RP 60 *et. seq.*, arguing that the state hadn't proved by

independent evidence that a crime occurred or that Mr. Johnson's vehicle being in the travelled portion of the roadway was the proximate cause of Mr. Barnes's injury. In ruling on the motion, the court cited RCW 46.61.560 and 570: "both speak to the duty of a driver when it comes to stopping or parking a vehicle, and prohibits that to be done under certain conditions. And 46.61.570 provides that except when necessary to avoid conflict with other traffic, no person shall stop, stand, or park a vehicle on the roadway." RP 65. "This white vehicle was stopped, at least partially in the traveled portion of the westbound lane of SR 12 in such a way as to obstruct other vehicles. And that's a crime." RP 71.

The court also found that in doing so Mr. Johnson acted with disregard for the safety of others, in that stopping a vehicle on a state highway, not a residential street, and then backing against the flow of traffic was clearly more than ordinary negligence. RP 74. As the court would later explain "[i]t's dangerous to back your vehicle down a four-lane, divided highway against the flow of traffic. You know, that's – you don't need to be a Rhodes Scholar to figure that one out. That is dangerous. And it places lives in danger, which is the working definition of disregard for the safety for others. So, it is not a close call on that

element of the crime. Mr. Johnson's conduct was flat out dangerous." RP 83-84.

The court denied the motion to dismiss. RP 74.

Regarding proximate cause the court found that Mr. Johnson's actions were the proximate cause of Ms. Barnes's injuries: ". . .I don't have any basis for concluding that she was following at an unsafe distance. I think the evidence supports a finding that she was confronted with an emergency, through no fault of her own, and when people are confronted with emergencies through no fault of their own, their duty is to act reasonably, and I believe she did act reasonably." RP 85.

Petitioner was found guilty as charged. CP 22-26; RP 83-85.

Petitioner appealed to the Court of Appeals, Division II, raising both *corpus delicti* and intervening / superseding cause (arguing that Ms. Barnes's failure to stop in time indicated that she was following too close, and was thus both an intervening and superseding cause of her injuries) as he does here. The Court of Appeals affirmed the trial court in an unpublished opinion filed on January 05, 2021 and, in reviewing the *corpus delicti* rule, found as follows:

> Barnes's and Himley's testimonies, considered together, establish that Johnson pulled his vehicle into the right lane of travel and provide independent corroborating evidence

> demonstrating that he drove his vehicle with disregard for the safety of others that was inconsistent with innocence. Therefore, there was independent proof that he committed a criminal act that caused Barnes's injuries. Because there was sufficient evidence to establish corpus delicti, we hold that the trial court did not err when it denied Johnson's motion to dismiss based on lack of corpus delicti.

State v. Johnson, No. 53189-5-II, Unpublished Opinion, p. 12.

The court also held that the State only needed to prove that petitioner's actions were *a* proximate cause of Barnes's injuries, not *the* proximate cause, and not reasonably foreseeable to be a superseding cause: "[a]nd the possibility that a vehicle on a highway may be following another vehicle too closely to brake in time under these circumstances is reasonably foreseeable, so Barnes's actions could not be considered a superseding cause."

Johnson now petitions this court for review pursuant to RAP 13.4(b)(1), (2) and (4). However, the petitioner makes no showing of how the decision of the Court of Appeals is in conflict with a decision of the Supreme Court (RAP 13.4 (b)(1)), a published decision of the Court of Appeals (RAP 13.4(b)(2)) or how the petition involves an issue of substantial public interest that should be determined by the Supreme Court (RAP 13.4(b)(4)).

III. ARGUMENT

CORPUS DELICTI ONLY REQUIRES THE STATE TO PRODUCE *PRIMA FACIE* EVIDENCE OF THE CRIME TO CORROBORATE A CONFESSION

The term "*corpus delicti*" refers to the legal principle that a defendant's statements alone are not sufficient to establish that a crime took place. *State v. Brockob*, 159 Wn.2d 311, 328, 150 P.3d 59 (2006). The purpose of this common law rule is to safeguard against the conviction of innocent persons, protect against unjust convictions based only upon a false confession, and prevent the possibility that such a confession was falsely obtained through coercion, abuse, or even voluntarily. *Bremerton v. Corbett*, 106 Wn.2d 569, 576–77, 723 P.2d 1135 (1986). "Corpus delicti usually consists of two elements: (1) an injury or loss (*e.g.*, death or missing property) and (2) someone's criminal act as the cause thereof." *Corbett* at 573-574.

The *corpus delicti* rule, fully explained, goes thusly:

> The confession of a person charged with the commission of a crime is not sufficient to establish the *corpus delicti*, but if there is independent proof thereof, such confession may then be considered in connection therewith and the *corpus delicti* established by a combination of the independent proof and the confession. The independent evidence need not be of such a character as would establish the *corpus delicti* beyond a reasonable doubt, or even by

> a preponderance of the proof. It is sufficient if it *prima facie* establishes the *corpus delicti*.

State v. Meyer, 37 Wn.2d 759, 763-64, 226 P.2d 204 (1951).

Prima facie means that there is "evidence of sufficient circumstances which would support a logical and reasonable inference of the facts sought to be proved." *State v. Aten*, 130 Wn.2d 640, 656, 927 P.2d 210 (1996).

Corpus delicti is also a rule of sufficiency, not merely a rule of evidence. *State v. Cardenas-Flores*, 189 Wn.2d 243, 257, 401 P.3d 19, 27 (2017). As such, the reviewing court looks at the totality of the evidence to determine whether the finder-of-fact's decision is untenable. While a reviewing court reviews the record *de novo*, the standard is low: "[t]he standard of review for a challenge to the sufficiency of the evidence is whether, viewing the evidence in a light most favorable to the State, any rational trier of fact could have found the essential elements of the crime beyond a reasonable doubt." *State v. Randhawa*, 133 Wn.2d 67, 73, 941 P.2d 661 (1997); *Aten*, *supra* at 666–67; *State v. Sweany*, 174 Wn.2d 909, 914, 281 P.3d 305, 307 (2012); *State v. Green*, 94 Wn.2d 216, 616 P.2d 628 (1980). In determining whether there is sufficient evidence of the *corpus delicti* independent of the defendant's statements, the Court must assume the "truth of the State's evidence and all reasonable inferences

from it in a light most favorable to the State." *Cardenas-Flores, supra* at 257, *quoting Aten, supra* at 658. The independent evidence did not need to rise to that which would establish the *corpus delicti* beyond a reasonable doubt, or even by a preponderance of the proof. *Meyer, supra* at 763. "The independent evidence need not be sufficient to support a conviction or even to send the case to the jury." *Corbett, supra* at 578. The independent evidence need only support "a logical and reasonable inference of the facts the State seeks to prove." *Brockob, supra* at 328. That independent evidence "must be consistent with guilt and inconsistent with an hypothesis of innocence." *Cardenas-Flores, supra* at 264, *quoting Aten* at 660.

Here, the element of injury loss or is not in dispute; the criminal act the State needed to prove *prima facie* was that Mr. Johnson operated his vehicle with disregard for the safety of others which was a proximate cause of Ms. Barnes's injuries.

The State produced corroborative prima facie evidence of a criminal act.

The crime alleged by the state was that Mr. Johnson operated his vehicle with disregard for the safety of others. CP 33.

"Disregard for the safety of others" is defined by WPIC 90.05 as follows:

> Disregard for the safety of others means an aggravated kind of negligence or carelessness, falling short of recklessness but constituting a more serious dereliction than ordinary negligence. Ordinary negligence is the failure to exercise ordinary care. Ordinary negligence is the doing of some act which a reasonably careful person would not do under the same or similar circumstances or the failure to do something which a reasonably careful person would have done under the same or similar circumstances. Ordinary negligence in operating a motor vehicle does not render a person guilty of vehicular homicide.

With regard to disregard for the safety of others, the trial court referred to RCW 46.61.560 and 570: "both speak to the duty of a driver when it comes to stopping or parking a vehicle, and prohibits that to be done under certain conditions. And, [RCW] 46.61.570 provides that except when necessary to avoid conflict with other traffic, no person shall stop, stand, or park a vehicle on the roadway." RP 65. "This white vehicle was stopped, at least partially in the traveled portion of the westbound lane of SR 12 in such a way as to obstruct other vehicles. And that's a crime." RP 71. "The driving conduct of Mr. Johnson as I explained a few minutes ago constitutes disregard for the safety of others . . . clearly not a minor inadvertence or omission, it was given the location where it occurred.

Stopping your vehicle and/or stopping and backing up your vehicle against the flow of traffic on a state highway is beyond ordinary negligence." RP 76. *See* RCW 46.61.605 – Limitations on Backing.

The Court of Appeals agreed:

> But Johnson ignores Barnes's testimony that when she saw the white vehicle before Newport suddenly stopped, the white vehicle was near to, but not in the roadway. Between the time Barnes noticed the white vehicle and the time Newport and Himley saw the vehicle and stopped, it had pulled significantly into the right lane of travel. Regardless of whether Johnson was going forward or backward, pulling into the lane of travel of a freeway while other vehicles are present is sufficient evidence to establish that Johnson had driven with disregard for the safety of others for purposes of the corpus delicti rule. And the facts of the short amount of time between Barnes seeing the vehicle near to but not in the roadway and Newport and Himley finding the vehicle halfway into the roadway, are inconsistent with an innocent explanation such as Johnson's vehicle stalling or experiencing some "mishap" that kept him from pulling out of the way.

State v. Johnson, No. 53189-5-II, Unpublished Opinion, pp. 11-12 (emphasis added).

The conduct alleged must also be "consistent with guilt and inconsistent with an hypothesis of innocence." *Aten* at 660.

In *Aten*, a baby named Sandra died and the mother was charged with second degree manslaughter. At issue was the cause of death of the child. *Aten* at 640. The State's theory was that the defendant has

smothered her baby. The medical examiner performed an autopsy on Sandra and concluded that Sandra died of SIDS, which is acute respiratory failure. "He acknowledged suffocation could cause acute respiratory failure. But he also testified he could not determine in an autopsy whether acute respiratory failure was caused by SIDS or by suffocation." *Id.,* at 659. Further, "Independent corroborating evidence shows Sandra had a simple viral upper respiratory infection on January 28, 1991." *Id*. The court ultimately held that "since the independent evidence in this case supports a reasonable and logical inference or hypothesis of innocence, that is, that Sandra died of SIDS, that is not sufficient to establish the *corpus delicti*." *Id.,* at 660.

Here, the mere position of petitioner's car, as well as the testimony of Ms. Barnes and Ms. Himley, when taken together, corroborate petitioner's statement and provide *prima facie* evidence that a crime occurred: Mr. Johnson stopped his car parallel to Highway 12 and was attempting to back it into his driveway and in doing so swung the front of the car into the travelled portion of the highway. Because the truck in front of Mr. Newport "jumped into the next lane over to the left . . . I don't think that they signaled; they didn't have time . . . It was abrupt", RP 14-17, an inference can be made that the white car was not just an obstruction

that was stationary, like a parked disabled car, but one that was moving and caused a sudden unexpected change for the first red truck.

This is consistent with the vehicle being parallel to the highway when Ms. Barnes first saw it and then sticking out into the right lane when the red truck moved to the left lane and it was seen by Mr. Newport and Ms. Himley. There is simply no evidence (beyond speculation), as there was in *Aten,* to support "an hypothesis of innocence" as to why Mr. Johnson's vehicle was in the roadway.

The State proved beyond a reasonable doubt that petitioner's driving was a proximate cause of Ms. Barnes's injuries; Ms. Barnes's driving was not an intervening, superseding cause.

Washington Pattern Instruction Criminal (WPIC) 90.07 requires that "the driving of a defendant . . . was a proximate cause of the resulting substantial bodily harm." WPIC 90.07 further defines "proximate cause" as "a cause which, in a direct sequence, unbroken by any new independent cause, produces the substantial bodily harm, and without which the substantial bodily harm would not have happened. There may be more than one proximate cause of substantial bodily harm." *See also State v. Roggenkamp,* 153 Wn.2d 614, 631, 106 P.3d 196 (2005).

The trial court found the absence of the intervening cause as a conclusion of law. CP 25. The Court specifically found the following:

> Ms. Barnes saw the white vehicle on the side of the road, appropriately had her foot on her brake, and applied her brakes without any delay or hesitation as soon as she saw Mr. Newport's F-350 apply its brakes. There is no basis to find that Ms. Barnes was following too closely or otherwise driving negligently. When confronted with an emergency that is no fault of one's own, and when a person so confronted with an emergency acts reasonably, such as applying brakes as soon as possible, that person's response is not a subsequence intervening cause. Mr. Newport acted reasonably in driving. Ms. Barnes acted reasonably in driving. There being no evidence of any other intervening causes, the Defendant's driving is therefore the proximate cause of this collision.

Conclusions of law are reviewed *de novo*. *State v. Reynolds*, 144 Wn.2d 282, 287, 27 P.3d 200 (2001).

Petitioner suggests that the testimony shows Mr. Barnes was following too close. Instead, her testimony shows that she saw petitioner's car was "out there very close to the line, edge of the highway, if not over it" (RP 27) and she was alert and covered her brakes. She then checked to see what traffic was around, as if she was looking for an escape route, and then Mr. Newport stopped suddenly and did not have time to dodge him.

Even if the evidence suggested that Ms. Barnes was following too close or too slow to slam on her brakes, such driving does not rise to the level of an intervening cause for the criminal case. "[T]o escape liability, a defendant would have to show contributory negligence was a

supervening cause without which [the defendant's] negligence would not have caused the accident." *State v. Judge*, 100 Wn.2d 706, 718, 675 P.2d 219, 226 (1984).

On this issue *State v. Roggenkamp*, 115 Wn. App. 927, 64 P.3d 92 (2003) is instructive. In *Roggenkamp*, the defendant and another teenager driving another car were driving very fast down a two-lane country residential road lined with mailboxes and driveways with a posted speed limit of 35 miles per hour; they were headed to a friend's house. 115 Wn. App. at 931-932. Three other cars were travelling together on a road that intersected with the road Roggenkamp was on and stopped at the stop sign at the intersection. *Id., at* 932. The first car was able to turn left and go with the flow of traffic ahead of Roggenkamp and his friend although, when she realized how fast the two vehicles were approaching, she pulled over to the side of the road. *Id., at* 932-933. The second car, driven by a Ms. Carpenter, also stopped at the stop sign and then attempted to make the same left turn as the first car, and was slammed into by Roggenkamp. Roggenkamp had slammed on his brakes when he saw the first car pull out and skidded more than 200 feet before hitting Ms. Carpenter's car in the intersection. *Id.*, at 933. Ms. Carpenter and one of her passengers were

injured; her other passenger, her son, was killed. *Id.* Ms. Carpenter's blood alcohol concentration was .013. *Id.,* at 934.

Roggenkamp was charged with one count of vehicular homicide and two counts of vehicular assault. *Id.,* at 934. Roggenkamp argued Carpenter's "actions (driving with a 0.13 blood alcohol concentration and pulling out in front of Roggenkamp) were the superseding cause of the accident." *Id.,* at 942. The court noted that contributory negligence is not a defense to negligent homicide and to be a superseding cause sufficient to relieve a defendant from liability, "an intervening act must be one that is not reasonably foreseeable." *Id.,* at 945. The *Roggenkamp* Court laid out three factors in determining whether an intervening act is a superseding cause: whether the intervening act created a different type of harm, whether it constituted an extraordinary act, and whether the intervening act operated independently. *Id*. The court held that given the residential neighborhood in which he was driving, a car pulling out into traffic is something he should have reasonably foreseen. *Id*., at 946. Regarding the timing of Ms. Carpenter's drinking and pulling out in front of Mr. Roggenkamp, the court found "At most, Carpenter's actions were a concurring cause, not a superseding cause, of the accident. A concurring,

as opposed to an intervening, cause does not shield a defendant from vehicular homicide." *Id.,* at 947.

The Supreme Court affirmed:

> We have reviewed the Court of Appeals decision resolving this issue in favor of the State and find ourselves entirely in agreement with the decision and the reasoning that led to it. As the Court of Appeals pointed out, JoAnn Carpenter's actions were, at most, a concurring cause, not a superseding cause of the accident. A concurring cause does not shield a defendant from a vehicular homicide conviction.

Roggenkamp, 153 Wn.2d at 630–31.

Applying the test in *Roggenkamp,*115 Wn. App. 927, 945 to the case at hand, it is clear that even if the facts suggest Ms. Barnes was following too close, or did not press the brake quickly enough, it would not shield the petitioner as a defense. He should reasonably expect traffic on the road to be moving quickly and that maneuvering his car the way he did would cause an accident. Further, because Ms. Barnes's position in traffic relative to Mr. Newport was already in place when the Appellant put his car in reverse and swung the front of it into traffic, it cannot be said to be a superseding cause.

IV. CONCLUSION

The State presented sufficient independent evidence to make a *prima facie* showing of vehicular assault to corroborate petitioner's

confession and to satisfy *corpus delicti*. There is no evidence to support a "hypothesis of innocence." Ms. Barnes saw petitioner's vehicle on the side of the road apparently parallel to traffic, but wasn't sure if it was moving; the red truck darts over to the left lane and Ms. Himley sees petitioner's vehicle perpendicular and halfway in the lane of travel, consistent with an alley-back maneuver. The trial court correctly determined that petitioner operated his vehicle with disregard of the safety of others and the State proved beyond a reasonable doubt that such operation was a proximate cause of Ms. Barnes's injuries. Even if Ms. Barnes was somehow contributorily negligent, *Roggenkamp*, 115 Wn. App. 927, sets a very high bar for what could constitute an intervening cause; the facts do not support such a finding.

Mr. Johnson petitions this court for review pursuant to RAP 13.4(b)(1), (2), and (3), but has made no showing that the decision of the Court of Appeals is in conflict with a decision of the Supreme Court, a published decision of the Court of Appeals (there's been no showing that either the trial court or the Court of Appeals applied the wrong legal standard or wrong legal test), or how the petition involves an issue of ***substantial*** public interest that should be determined by the Supreme Court (while this case involves a serious crime, there is nothing

extraordinary about the facts or issues raised). Review will be granted ***only if*** the petition satisfies one of the enumerated grounds; this petition does not.

For all the foregoing reasons the State respectfully requests that this Court deny the Petition for Review.

DATED this 5th day of March, 2021.

Respectfully Submitted,

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GRAYS HARBOR COUNTY PROSECUTING ATTORNEY'S OFFICE

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