

NO. 42947-1- II
Cowlitz Co. Cause NO. 11-1-00768-2

**COURT OF APPEALS, DIVISION II
OF THE STATE OF WASHINGTON**

STATE OF WASHINGTON,

Respondent,

v.

JOSEPH W. WEBB,

Appellant.

BRIEF OF RESPONDENT

SUSAN I. BAUR
Prosecuting Attorney
SEAN BRITTAIN/WSBA 36804
Deputy Prosecuting Attorney
Attorney for Respondent

Office and P. O. Address:
Hall of Justice
312 S. W. First Avenue
Kelso, WA 98626
Telephone: 360/577-3080

TABLE OF CONTENTS

PAGE

CONTENTS i

I.	ISSUES.....	1
II.	SHORT ANSWERS.....	1
III.	FACTS	1
IV.	ARGUMENTS.....	5
	1. THERE WAS SUFFICIENT EVIDENCE TO CONVICT THE APPELLANT OF RESIDENTIAL BURGLARY AND THEFT IN THE THIRD DEGREE.	5
	2. THE AGGRAVATING FACTOR WAS PROPELY APPLIED TO THE APPELLANT FOR HIS ROLE IN THE BURGLARY.	11
	3. THE APPELLANT RECEIVED EFFECTIVE ASSISTANCE OF COUNSEL.....	13
V.	CONCLUSION	16

TABLE OF AUTHORITIES

	Page
Cases	
<i>In re Howerton</i> , 109 Wn. App. 494, 36 P.3d 565 (2001)	11
<i>Powell v. Alabama</i> , 287 U.S. 45, 53 S.Ct. 55, 77 L.Ed. 158 (1932).....	13
<i>State v. B.J.S.</i> , 140 Wn. App. 91, 169 P.3d 34 (2007)	7
<i>State v. Brockob</i> , 159 Wn.2d 311, 344-45 (2006)	14
<i>State v. Delmarter</i> , 94 Wn.2d 634, 618 P.2d 99 (1980)	5
<i>State v. Dove</i> , 52 Wn. App. 81, 757 P.2d 990 (1988).....	7
<i>State v. Garrett</i> , 124 Wn.2d 504, 520 (1994)	15
<i>State v. Green</i> , 94 Wn.2d 216, 616 P.2d 628 (1980)	5
<i>State v. Hendrickson</i> , 129 Wn.2d 61, 77-78 (1996).....	14
<i>State v. Jones</i> , 63 Wn.App. 703, 821 P.2d 543, <i>review denied</i> , 118 Wn.2d 1028, 828 P.2d 563 (1992)	6
<i>State v. Joy</i> , 121 Wn.2d 333, 851 P.2d 654 (1993).....	6
<i>State v. Jury</i> , 19 Wn. App. 256, 262, (1978)	13
<i>State v. Lopez</i> , 107 Wn. App. 270, 275 (2001), <i>aff'd</i> , 147 Wn.2d 515 (2002).....	14
<i>State v. McFarland</i> , 127 Wn.2d 322, 335 (1995).	15
<i>State v. McKim</i> , 98 Wn.2d 111, 653 P.2d 1040 (1982)	11
<i>State v. Myers</i> , 86 Wn.2d 419 (1976)	14

<i>State v. Pineda-Pineda</i> , 154 Wn. App. 653, 226 P.3d 164 (2010)	12
<i>State v. Sardinia</i> , 42 Wn. App. 533, 539, <i>review denied</i> , 105 Wn.2d 1013 (1986).....	14
<i>State v. Silva</i> , 106 Wn. App. 586, 24 P.3d 477 (2001).	15
<i>State v. Visitacion</i> , 55 Wn. App. 166, 173 (1989)	14
<i>State v. Walton</i> , 64 Wn. App. 410, 824 P.2d 533, <i>review denied</i> , 119 Wn.2d 1011 (1992).....	6
Statutes	
RCW 9.94A.535(3)(u)	11
RCW 9A.08.020(3)(a)	7
RCW 9A.52.050.....	6
RCW 9A.56.020(1)(a)	6
RCW 9A.56.040(1)(a)	6
Other Authorities	
U.S. Const. Amend. VI, Wash. Const. art. 1, § 22	13

I. ISSUES

1. Is there sufficient evidence to support the Appellant's convictions for Residential Burglary and Theft in the Third Degree?
2. Was the aggravating factor properly applied to the Appellant?
3. Did the Appellant receive ineffective assistance of counsel?

II. SHORT ANSWERS

III.

1. Yes, the State presented sufficient evidence to the trier of fact to support the convictions for Residential Burglary and Theft in the Third Degree.
2. Yes, the aggravating factor was properly applied to the Appellant for his role in the burglary.
3. No, the Appellant's counsel's performance was not ineffective.

III. FACTS

During the morning of July 26, 2011, M.K. and C.K. were home within their residence on Banyon Drive, Kelso, Washington. 2RP at 132. Both of their parents were at work. 2RP at 132. M.K. was in bed in her room on the second floor of the house. 2RP at 134. C.K. was downstairs watching T.V. 2RP at 150. At approximately 8:30 a.m., M.K. heard the sound of the doorbell of her front door ringing approximately thirty times. 2RP at 134. As M.K. approached the top of the stairs to see who was at the door, she heard "pounding, very loud pounding, and the door hinge trying to click open." 2RP at 135. M.K. was able to see a white male at her front door. She observed him dressed in white and did not see anyone

else with him at the front door. 2RP at 135-36. A few minutes later, M.K. heard the sound of her family's dirt bike starting up in her basement and her younger sister, C.K., scream. 2RP at 137-38. M.K. looked out of her bathroom window and observed a male wearing black driving away on her family's dirt bike. 2RP at 138. This person was not the same person she had seen a few minutes before at her front door. 2RP at 138. M.K. called 911 and waited for the police to respond. 2RP at 141.

C.K. testified that she heard the doorbell to her front door ring numerous times and a pounding on the door. 2RP at 150-51. C.K. further testified that she heard the sound of someone trying to open the door. "You could hear the door handle, like moving. And I could see it 'cause I – when I was standing, you could see that it was moving. 2RP 151. C.K. approached the window next to the front door and observed a clean shaven white male wearing a baseball hat down by his eyes and a black shirt. 2RP at 153. There was no one accompanying the male at the front door. 2RP at 154. A few minutes later, C.K. looked out of window that faced her backyard. She testified that she saw the same male who had been at the front door running away from her house. 2RP at 157. He was wearing a backpack that contained her family's hedge trimmer. 2RP at 158. While this person was running, C.K. heard the sound of her family's dirt bike starting in her basement. 2RP at 158. She saw another person driving

through her yard on the dirt bike. 2RP at 159. This person was a male who had a mustache and was not wearing a hat. 2RP at 159. C.K. testified that after losing sight of both individuals briefly, she later saw both of them riding away on the dirt bike. 2RP at 162.

The Kelso Police Department responded to M.K.'s 911 call. While en route, Detective Ken Hochhalter observed a motorcycle with a single person on it fleeing from the general area of the burglary. 2RP at 189. While attempting to double back around and cut off the motorcycle, Detective Hochhalter also observed another person carrying a backpack and running down an embankment. 2RP at 190-91.

After apprehending the person on the motorcycle, later identified as Lester Simmons, the police officers began searching for the person in possession of the backpack. 2RP at 191. A few minutes later, Officer Brian Clark saw Joseph Webb, the Appellant, wearing a backpack with a red/orange item sticking out. 2RP at 213. Officer Clark momentarily lost sight of the Appellant; however, when he next saw him, the Appellant was no longer wearing the backpack. 2RP at 214. Officer Berglund likewise saw the Appellant wearing the backpack with the item sticking out of it. 2RP at 229. Detective Hochhalter was able to apprehend the Appellant as he was fleeing through the yards of local homes. 2RP at 194.

Officer Dave Shelton spoke with Mr. Simmons about the burglary and the Appellant's participation. Mr. Simmons admitted to burglarizing the Kissinger's home and that the Appellant participated. 2RP at 290-92. The Appellant denied knowledge of the incident. 2RP at 217. M.K. and C.K. were brought to the location of Mr. Simmons and the Appellant. M.K. identified the Appellant as the lone person who had been at her front door. 2RP at 234. C.K. identified Mr. Simmons as the person driving her family's dirt bike through her yard. 2RP at 234. Shortly thereafter, a backpack containing the Kissinger's property was located and turned into the police. 2RP at 237. The backpack was the same as the one the Appellant was seen carrying as he fled from the police. 2RP at 212, 218-19. The backpack also contained a prescription pill bottle with the Appellant's name on it and a social security card with the name Erma Webb. 2RP at 242-43.

The State charged the Appellant by information with Residential Burglary, Taking a Motor Vehicle Without Permission in the Second Degree and Theft in the Third Degree. CP 1-3. On September 28, 2011, the State filed an information alleging that the Appellant committed the burglary while "the victim of the burglary was present in the building or residence when the crime was committed." CP 4-6. A jury trial commenced on November 9, 2011. The jury returned guilty verdicts on

count I – Residential Burglary and count III – Theft in the Third Degree. CP 68, 70. The jury found the Appellant not guilty of count II – Taking a Motor Vehicle Without Permission in the Second Degree. CP 69. The jury also returned a special verdict, finding that the victims were present when the burglary was committed. CP 71.

At sentencing, the Appellant stipulated this offender score was 7 and his standard range on the Residential Burglary charge was 43-57 months. Based upon the jury’s special verdict finding, the court imposed an exceptional sentence of 81 months. 3RP at 359; CP 81. The Appellant filed a timely notice of appeal. CP 97.

IV. ARGUMENTS

1. **THERE WAS SUFFICIENT EVIDENCE TO CONVICT THE APPELLANT OF RESIDENTIAL BURGLARY AND THEFT IN THE THIRD DEGREE.**

The standard of review for sufficiency of the evidence is whether, after viewing the evidence in the light most favorable to the prosecution, any rational trier of fact could have found the necessary facts to be proven beyond a reasonable doubt. *State v. Green*, 94 Wn.2d 216, 221, 616 P.2d 628 (1980). Circumstantial and direct evidence are equally reliable. *State v. Delmarter*, 94 Wn.2d 634, 638, 618 P.2d 99 (1980). For purposes of a challenge to the sufficiency of the evidence, the appellant admits the truth of the State’s evidence. *State v. Jones*, 63 Wn.App. 703, 707-08, 821 P.2d

543, *review denied*, 118 Wn.2d 1028, 828 P.2d 563 (1992). All reasonable inferences must be drawn in the State's favor and interpreted most strongly against the defendant. *State v. Joy*, 121 Wn.2d 333, 338-39, 851 P.2d 654 (1993). A reviewing court need not itself be convinced beyond a reasonable doubt, *Jones*, 63 Wn.App. at 708, and must defer to the trier of fact on issues of conflicting testimony, credibility of witnesses, and the persuasiveness of the evidence. *State v. Walton*, 64 Wn.App. 410, 415-16, 824 P.2d 533, *review denied*, 119 Wn.2d 1011 (1992).

The Appellant argues there was insufficient evidence to support his convictions for Residential Burglary and Theft in the Third Degree. A person commits the crime of Residential Burglary when, "with intent to commit a crime against property therein, the person enters or remains unlawfully in a dwelling other than a vehicle." RCW 9A.52.050. Theft is defined as "to wrongfully obtains or exerts unauthorized control over the property...of another...with intent to deprive him of such property." RCW 9A.56.020(1)(a). A person is guilty of Theft in the Third Degree when "he commits theft of property...(a)does not exceed seven hundred fifty dollars in value..." RCW 9A.56.040(1)(a).

A person is an accomplice if,

[w]ith knowledge that it will promote or facilitate the commission of the crime, he (i) solicits, commands, encourages, or requests such other person to commit it; or

(ii) aids or agrees to aid such other person in planning or committing it.

RCW 9A.08.020(3)(a). “‘Aiding’ in a crime includes ‘all assistance whether given by words, acts, encouragement, support, or presence. A person who is present at the scene and ready to assist by his...presence is aiding in the commission of the crime.’” *State v. B.J.S.*, 140 Wn. App. 91, 98, 169 P.3d 34 (2007) (quoting *State v. Dove*, 52 Wn. App. 81, 87, 757 P.2d 990 (1988)).

The fact that the jury rejected appellant’s theory of the case does not mean there was insufficient evidence to convict him; thus, this argument must fail. At trial, the State presented evidence beyond the simple fact that the Appellant was present at the Kissinger home when Mr. Simmons committed the burglary. The State’s evidence showed that there were two individuals who arrived at the Kissinger’s home on the morning of July 26, 2011, Mr. Simmons and the Appellant. Both M.K. and C.K. testified that only one person was at their front door, ringing the doorbell multiple times, pounding on the door loudly, and attempting to open it. Both M.K. and C.K. were able to differentiate between the Appellant, the person they had seen at the front door, from Mr. Simmons, the person they observed riding away on their family’s dirt bike.

Their testimony was later corroborated by Detective Hochhalter, Officer Shelton, Officer Clark, and Officer Berglund. While in pursuit of Mr. Simmons, Detective Hochhalter initially observed the Appellant running with a backpack. 2RP at 190. Officer Shelton testified that after Mr. Simmons was captured, a person matching the description of the Appellant was seen running through the yards of numerous houses. 2RP 203. Officer Clark saw the Appellant wearing a backpack with a red/orange item sticking out. 2RP at 213. Officer Clark momentarily lost sight of the Appellant; however, when he next saw him, the Appellant was no longer wearing the backpack. 2RP at 214. Officer Berglund likewise saw the Appellant wearing the backpack with the item sticking out of it. 2RP at 229. Officer Berglund was also the officer present when M.K. and C.K. identified the Appellant as the person who had been at the front door and Mr. Simmons as the person who had been on the dirt bike.

The Appellant relies upon the testimony in Mr. Simmons when arguing that he had no intent to aid in the commission of the burglary. During cross examination, Mr. Simmons testified that before he went inside of the Kissinger basement, he asked the Appellant for his backpack. The Appellant saw that Mr. Simmons was entering the Kissinger home and he handed his backpack to Mr. Simmons. 2RP at 277. Mr. Simmons also testified that the Appellant willingly took his backpack, which was

full of items taken from the Kissinger basement, back from Mr. Simmons. 2RP at 278. Mr. Simmons later admitted that he was driving the Kissinger dirt bike because the Appellant did not know how to drive a motorcycle. 2RP at 280. When questioned about what he told the police after he had been apprehended, Mr. Simmons testified “[d]on’t recall, but imagine I was lying to him.” 2RP at 280. Mr. Simmons also stated that he remembered every detail of the incident that occurred on July 26, 2011 except for the statements he made to the police after he was arrested. 2RP at 284.

During rebuttal testimony, the State impeached Mr. Simmons testimony. Officer Shelton testified that Mr. Simmons told him that he and the Appellant were in the area of the Kissinger home to look at the mudslide. Mr. Simmons made no mention of looking for work. 2RP at 288-89. Officer Shelton testified that Mr. Simmons told him that it was the Appellant’s idea to take the Kissinger dirt bike. 2RP at 290. Finally, Officer Shelton testified that Mr. Simmons told him that the Appellant had taken items from the Kissinger home and that everything in the Appellant’s backpack belonged to the Appellant. 2RP at 292.

The State did not simply rely upon the fact that the Appellant was present when Mr. Simmons committed the burglary. Nor did the State merely rely upon the fact that the Appellant had possession of the stolen

items. The Appellant's argument ignores the totality of the evidence that the State presented at trial. The Appellant was observed by two separate individuals trying to get inside of the house through the front door. At Mr. Simmons' request, he gave his backpack to Mr. Simmons, and then took it back after it had been loaded with stolen items. He was seen running away from the Kissinger house with the stolen items. In an attempt to elude police, he ran through numerous yards and ditched his backpack. The Appellant presented contradictory testimony. The jury heard Mr. Simmons' version of the events, heard him admit to lying, and heard Officer Shelton impeach his testimony.

As stated above, this court must defer to the jury on issues of conflicting testimony, credibility of witnesses, and the persuasiveness of the evidence. The jury heard both the State's and Appellant's theory of this case, listened to the individual witnesses that were presented, and were given an opportunity to assess the credibility of the testimony and the weight of the evidence. At the end of the trial, the jury rejected the Appellant's argument and found him guilty. As concluded by the *Dove* court, "[a] person who is present at the scene and ready to assist by his...presence is aiding in the commission of the crime." *Dove*, 52 Wn. App. at 87. The Appellant was present, ready to assist, and did in fact

assist in the both the commission of the burglary and the theft; therefore, this court should uphold his convictions.

2. THE AGGRAVATING FACTOR WAS PROPELY APPLIED TO THE APPELLANT FOR HIS ROLE IN THE BURGLARY.

[A] defendant's culpability for an aggravating factor cannot be premised solely upon accomplice liability for the underlying substance crime absent explicit evidence of the Legislature's intent to create strict liability. Instead, any such sentence enhancement must depend on the defendant's own misconduct.

In re Howerton, 109 Wn. App. 494, 501, 36 P.3d 565 (2001) (citing *State v. McKim*, 98 Wn.2d 111, 117, 653 P.2d 1040 (1982)).

RCW 9.94A.535(3)(u) provides:

[e]xcept for circumstances listed in subsection (2) of this section, the following circumstances are an exclusive list of factors that can support a sentence above the standard range. Such facts should be determined by procedures specified in RCW 9.94A.537.

(u) The current offense is a burglary and the victim of the burglary was present in the building or residence when the crime was committed.

RCW 9.94A.535(u) does not contain any specific authority to impose the sentence enhancement based upon accomplice liability. "Where there is no explicit statutory authorization for imposition of a sentence enhancement on an accomplice, the defendants' own acts must

form the basis for the enhancement.” *State v. Pineda-Pineda*, 154 Wn. App. 653 664, 226 P.3d 164 (2010).

The defendant in *Pineda-Pineda* was convicted of multiple counts of delivery of a controlled substance. *Id.* at 659. The jury returned special verdicts, finding that the defendant was within a school zone when two of the deliveries occurred. *Id.* There was no evidence presented to the jury that the defendant himself was present within the school zone when the second delivery occurred. The Court of Appeals vacated the sentence enhancement for the second delivery, holding that without evidence the defendant himself was within the school zone, accomplice liability cannot be a basis for the enhancement. *Id.* at 664.

One distinguishing fact to take from *Pineda-Pineda* is that the contested sentence enhancement involved the defendant’s actual presence when the crime was committed. The *Pineda-Pineda* court followed the holding in *McKim* and specifically looked at the defendant’s *own* conduct in the commission of the crime and whether that satisfied the enhancement. The court only vacated the second sentence enhancement – where no evidence was presented to establish the defendant’s presence within the school zone.

Here, under the same rationale, the aggravating factor was properly applied upon the Appellant. As stated above, the State’s evidence showed

that the Appellant was an active participant in the burglary of the Kissinger home. He was present, he attempted to enter the home through the front door, he provided Mr. Simmons with his backpack prior to Mr. Simmons entering the home and taking various items, and he fled the scene with the stolen items. Unlike the defendant in *Pineda-Pineda*, who was not even present during the commission of one of the crimes, the Appellant was present and aided in the burglary when the victims, M.K. and C.K., were home. Because the Appellant was actively involved in the commission of the crime, *his own specific actions* do form the basis for the aggravator; therefore, this court should uphold the sentence enhancement.

3. THE APPELLANT RECEIVED EFFECTIVE ASSISTANCE OF COUNSEL.

Both the Federal and Washington State Constitutions provide the right to assistance of counsel. *See State v. Jury*, 19 Wn. App. 256, 262, (1978); *see also* U.S. Const. Amend. VI, Wash. Const. art. 1, § 22. “[T]he substance of this guarantee is that courts must make ‘effective’ appointments of counsel.” *Jury*, 19 Wn. App. at 262 (quoting *Powell v. Alabama*, 287 U.S. 45, 53 S.Ct. 55, 77 L.Ed. 158 (1932)). Whether counsel is effective is determined by the following test: “[a]fter considering the entire record, can it be said that the accused was afforded an effective representation and a fair and impartial trial?” *Id.* (citing *State*

v. Myers, 86 Wn.2d 419 (1976)). Moreover, “[1]his test places a weighty burden on the defendant to prove two things: first, considering the entire record, that he was denied effective representation, and second, that he was prejudiced thereby.” *Id.* at 263.

The first prong of this two-part test requires the defendant to show “that his . . . lawyer failed to exercise the customary skills and diligence that a reasonably competent attorney would exercise under similar circumstances.” *State v. Visitacion*, 55 Wn. App. 166, 173 (1989) (citing *State v. Sardinia*, 42 Wn. App. 533, 539, *review denied*, 105 Wn.2d 1013 (1986)). The second prong requires the defendant to show “that there is a reasonable probability that, but for the counsel’s errors, the result of the proceeding would have been different.” *Id.* “A defendant must meet both prongs to satisfy the test.” *State v. Brockob*, 159 Wn.2d 311, 344-45 (2006).

Deference will be given to counsel's performance in order to “eliminate the distorting effects of hindsight” and the reviewing appellate court must indulge in a strong presumption that counsel’s performance is within the broad range of reasonable professional assistance. *State v. Lopez*, 107 Wn. App. 270, 275 (2001), *aff’d*, 147 Wn.2d 515 (2002). A decision concerning trial strategy or tactics will not establish deficient performance. *State v. Hendrickson*, 129 Wn.2d 61, 77-78 (1996); *State v.*

Garrett, 124 Wn.2d 504, 520 (1994); *State v. McFarland*, 127 Wn.2d 322, 335 (1995).

Conceding guilt in closing on a particular count, especially a lesser count, where the evidence is overwhelming can be sound trial tactic. *State v. Silva*, 106 Wn. App. 586, 596, 24 P.3d 477 (2001). Utilizing this approach may help win the confidence of the jury and preserve the defendant's credibility. *Id.* "An attorney need not consult with the client before making such a tactical move." *Id.*

Here, the Appellant was not denied his right to a fair trial or effective assistance of counsel when his attorney conceded guilt of Theft in the Third Degree. The Appellant was seen running away from the Kissinger house with a backpack full of their property. He was seen fleeing from the police with a backpack full of the Kissinger's stolen property. The evidence presented to the jury showed that he was present when these items were removed from the Kissinger basement. C.K. saw the Appellant running away from the basement with the backpack that had her family's hedge trimmer sticking out of it. She saw him exerting unauthorized control over her property.

By conceding that the Appellant was exerting unauthorized control over the Kissinger's property, the Appellant's counsel was actually furthering the defense theory – that there was no evidence that the

Appellant aided Mr. Simmons in the burglary, only speculation. No jury would have a doubt that the Appellant was exerting unauthorized control over the Kissinger's property. This was a sound tactical decision to secure an acquittal of the more serious charges.

The Appellant has not shown a reasonable probability that if not for the concession, the jury verdict would have been different. As stated above, the evidence that the Appellant exerted unauthorized control over the Kissinger's property was overwhelming. Therefore, the jury would likely have reached the same conclusion even if the Appellant's counsel had contested the theft charge. Thus, the Appellant has not demonstrated that his counsel was ineffective.

V. CONCLUSION

Appellant's alleged errors are without basis in law or fact. There was sufficient evidence to convict the Appellant of Residential Burglary and Theft in the Third Degree. Because the evidence clearly showed that the Appellant was actively involved in the burglary, the aggravating factor

and exceptional sentence was properly applied. Finally, the Appellant received effective assistance of counsel. As these claims are without merit, the Court should dismiss this appeal.

Respectfully submitted this 5 day of October, 2012

SUSAN I. BAUR
Prosecuting Attorney

By 
SEAN M. BRITTAIN
WSBA #36804
Deputy Prosecuting Attorney
Representing Respondent

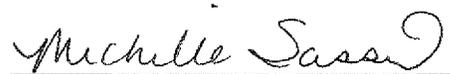
CERTIFICATE OF SERVICE

Michelle Sasser, certifies that opposing counsel was served electronically via the Division II portal:

Mr. Peter Tiller
The Tiller Law Firm
P.O. Box 58
Centralia, WA 98531-0058
ptiller@tillerlaw.com

I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

Signed at Kelso, Washington on October 3rd, 2012.



Michelle Sasser

COWLITZ COUNTY PROSECUTOR

October 03, 2012 - 11:56 AM

Transmittal Letter

Document Uploaded: 429471-Respondent's Brief.pdf

Case Name: State of Washington v. Joseph Webb

Court of Appeals Case Number: 42947-1

Is this a Personal Restraint Petition? Yes No

The document being Filed is:

- Designation of Clerk's Papers Supplemental Designation of Clerk's Papers
- Statement of Arrangements
- Motion: _____
- Answer/Reply to Motion: _____
- Brief: Respondent's
- Statement of Additional Authorities
- Cost Bill
- Objection to Cost Bill
- Affidavit
- Letter
- Copy of Verbatim Report of Proceedings - No. of Volumes: _____
Hearing Date(s): _____
- Personal Restraint Petition (PRP)
- Response to Personal Restraint Petition
- Reply to Response to Personal Restraint Petition
- Other: _____

Comments:

No Comments were entered.

Sender Name: Michelle Sasser - Email: sasserm@co.cowlitz.wa.us

A copy of this document has been emailed to the following addresses:
ptiller@tillerlaw.com