

NO. 43449-1-II

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION TWO

STATE OF WASHINGTON,

Respondent,

v.

ROBERT WAYNE RICE,

Appellant.

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

The Honorable Barbara Johnson, Judge

BRIEF OF APPELLANT

LISA E. TABBUT
Attorney for Appellant
P. O. Box 1396
Longview, WA 98632
(360) 425-8155

TABLE OF CONTENTS

	Page
A. ASSIGNMENTS OF ERROR	1
1. Mr. Rice’s Felony Harassment conviction infringed his Fourteenth Amendment right to due process.....	1
2. The evidence was insufficient to prove the elements of Felony Harassment.....	1
3. The prosecution failed to prove beyond a reasonable doubt that Deputy Bain was in reasonable fear that Mr. Rice’s threat to kill him would be carried out.	1
4. Mr. Rice was denied his state and federal constitutional right to adequate notice of a charge against him when he was charged with violating a civil anti-harassment order but convicted of violating a protection order.	1
5. The trial court erred in imposing 48 months of community custody on two consecutively sentenced misdemeanors.....	1
B. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR	1
1. Was the evidence sufficient to prove that Deputy Bain reasonably believed Mr. Rice’s threat to kill him when Deputy Bain testified he only believed Mr. Rice might assault him?	1
2. Mr. Rice was charged with violating an anti-harassment protection order under RCW 10.14.170 but convicted of violating a protection order issued under RCW 26.50.110. Did charging Mr. Rice with one crime but convicting him of another crime give him adequate notice of what crime he was actually charged with?	2
3. RCW 9.95.210 permits a trial court to impose a suspended sentence probation period “not exceeding the maximum term of sentence or two years.” Here, Mr. Rice was convicted of two misdemeanors. The trial court sentenced him to a total term of 12	

months on each and ran them consecutively for a maximum sentencing term of 24 months. The trial court then imposed 48 months of probation – 24 months beyond what is permitted under RCW 9.95.210. Did the trial court exceed its statutory authority?.. 2

C. STATEMENT OF THE CASE..... 2

D. ARGUMENT..... 6

1. MR. RICE’S FELONY HARASSMENT CONVICTION VIOLATED HIS FOURTEENTH AMENDMENT RIGHT TO DUE PROCESS BECAUSE THE EVIDENCE WAS INSUFFICIENT FOR CONVICTION..... 6

2. MR. RICE’S CONVICTION FOR VIOLATING A PROTECTION ORDER CANNOT STAND BECAUSE HE WAS NOT CHARGED WITH THAT CRIME..... 9

3. THE TRIAL COURT HAD NO AUTHORITY TO IMPOSE TWO CONSECUTIVE TERMS OF 24 MONTHS OF PROBATION ON THE TWO MISDEMEANOR CONVICTIONS. 12

E. CONCLUSION 14

CERTIFICATE OF SERVICE 16

TABLE OF AUTHORITIES

Cases

<i>Auburn v. Brooke</i> , 119 Wn.2d 623, 836 P.2d 212 (1992)	10
<i>Bellevue School Dist. v. E.S.</i> , 171 Wn.2d 695, 257 P.3d 570 (2011)	6
<i>In re Pers. Restraint of Call</i> , 144 Wn.2d 315, 28 P.3d 709 (2001)	12
<i>Smalis v. Pennsylvania</i> , 476 U.S. 140, 106 S.Ct. 1745, 90 L.Ed.2d 116 (1986).....	9
<i>State v. Anderson</i> , 96 Wn.2d 739, 638 P.2d 1205 (1982).....	12
<i>State v. Bray</i> , 52 Wn. App. 30, 756 P.2d 1332 (1988).	12
<i>State v. Breaux</i> , 167 Wn. App. 166, 176, 273 P.3d 447 (2012).....	14
<i>State v. C.G.</i> , 150 Wn.2d 604, 610, 80 P.3d 594 (2003).....	9
<i>State v. Engel</i> , 166 Wn.2d 572, 210 P.3d 1007 (2009.).....	7
<i>State v. Irizarry</i> , 111 Wn.2d 591, 763 P.2d 432 (1988).....	10
<i>State v. Parent</i> , 164 Wn. App. 210, 267 P.3d 358 (2011)	13, 14
<i>State v. Toney</i> , 149 Wn. App. 787, 205 P.3d 944 (2009)	12
<i>State v. Vangerpen</i> , 125 Wn.2d 782, 888 P.2d 1177 (1995).....	10, 12

Statutes

RCW 10.14.170	i, 1, 6
RCW 10.61.003	10
RCW 26.50.110	i, 1, 11
RCW 9.92.060	13

RCW 9.95.210	i, ii, 2, 13, 14
RCW 9A.46.020(2)(b)(ii)	6
RCW 9A.46.110(1).....	6
RCW 9A.46.110(5)(a).	7

Other Authorities

11 WA PRAC WPIC 36.51	11
RAP 2.5(a)(3).....	12
Washington Const. Art. 1, § 22 (Amend. 10)	9
U.S. Const. Amend. 6.....	9

A. ASSIGNMENTS OF ERROR

1. Mr. Rice's Felony Harassment conviction infringed his Fourteenth Amendment right to due process.

2. The evidence was insufficient to prove the elements of Felony Harassment.

3. The prosecution failed to prove beyond a reasonable doubt that Deputy Bain was in reasonable fear that Mr. Rice's threat to kill him would be carried out.

4. Mr. Rice was denied his state and federal constitutional right to adequate notice of a charge against him when he was charged with violating a civil anti-harassment order but convicted of violating a protection order.

5. The trial court erred in imposing 48 months of community custody on two consecutively sentenced misdemeanors.

B. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR

1. Was the evidence sufficient to prove that Deputy Bain reasonably believed Mr. Rice's threat to kill him when Deputy Bain testified he only believed Mr. Rice might assault him?

2. Mr. Rice was charged with violating an anti-harassment protection order under RCW 10.14.170 but convicted of violating a protection order issued under RCW 26.50.110. Did charging Mr. Rice

with one crime but convicting him of another crime give him adequate notice of what crime he was actually charged with?

3. RCW 9.95.210 permits a trial court to impose a suspended sentence probation period “not exceeding the maximum term of sentence or two years.” Here, Mr. Rice was convicted of two misdemeanors. The trial court sentenced him to a total term of 12 months on each and ran them consecutively for a maximum sentencing term of 24 months. The trial court then imposed 48 months of probation – 24 months beyond what is permitted under RCW 9.95.210. Did the trial court exceed its statutory authority?

C. STATEMENT OF THE CASE

Jody Beach is a custody officer at the Clark County Jail. 2A RP at 210. In March 2011, Mr. Rice was arrested and brought into the jail. 2A RP at 212. He was so angry, belligerent, and uncooperative that it took several days to finish booking him. Mr. Rice was placed in a holding cell near the booking desk while the jail staff waited for him to calm down. 2A RP at 284. When Beach was on duty, Mr. Rice occasionally shouted at her and another custody officer threatening to shoot and kill them. 2A RP at 215, 218. This was the first time Beach had contact with Mr. Rice. 2A RP at 212, 214.

This sort of behavior was not anything Beach had not seen before at the jail. Her job brought her into contact with all sorts of difficult people. It was just part of the job. 2A RP at 281. Beach noticed that per the jail records, Mr. Rice was previously booked at the jail. His file had an internal “flag” on it suggesting Mr. Rice had mental health problems and when he was moved within the jail, he had to be escorted for safety reasons by two corrections officers. 2A RP at 214-15, 218.

Mr. Rice was released at some point but later came back into the jail and was an inmate there from mid-October to mid-November 2011. 2A RP at 221. Beach came into contact with Mr. Rice during that time but had no problems with him. To her, his stay was not memorable. 2A RP at 276.

Shortly after his November release, Mr. Rice displayed an interest in Beach. During Thanksgiving weekend, he stopped by the jail’s front desk to see Beach because he thought they had a breakfast date. 2B RP at 351-53. On another occasion, he tried to leave a bouquet of flowers and a card for her at the jail’s front desk. 2B RP at 332, 337, 342. The card said the he was having surgery soon and that he needed her phone number and that he loved her. 2B RP at 366-67. Beach was made aware of Mr. Rice’s efforts to contact her. 2A RP at 229. She was not interested in Mr. Rice

and did not want him to contact her at work or otherwise. 2A RP at 271-73.

In December 2011, a Clark County Sheriff's sergeant tasked two of his officers, Deputy Bain and Deputy Hafer, with reaching out to Mr. Rice and telling him Beach did not want him to contact her. 2A RP at 292-95. By happenstance, the two deputies were able to contact Mr. Rice after he showed up at the courthouse to attend to some matters completely unrelated to Beach. 3A RP at 395. Hafer took Mr. Rice into a conference room and tried to explain to him that Beach did not want contact from him. Mr. Rice had a hard a time believing that and raised his voice angrily at the deputy. 3A RP at 399-400.

Hearing the loud voices, Bain stepped into the conference room and took his turn telling Mr. Rice that Beach did not want him to contact her. 2A RP at 294-97. Mr. Rice became angrier still and repeatedly threatened to kill Bain. Bain responded by stepping back and unsnapping the holster on his taser. 2A RP at 297-98. As the threats continued, Bain decided to control the situation by arresting Mr. Rice for Felony Harassment. 2A RP at 299. Bane called a third deputy in to help with the arrest. 2A RP at 301. Mr. Rice was arrested and handcuffed without incident and taken to the jail. 2A RP at 301-02. Mr. Rice continued

making threats to kill Bain on the way to, and while in, the jail. 2A RP at 301-02.

During his testimony, Deputy Bain explained that he had some fear that Mr. Rice would assault him. 2A RP at 298, 311.

Beach decided to petition the court for a civil anti-harassment order to discourage Mr. Rice from making any effort to contact her. 2A RP at 225. On December 28, a Clark County district court commissioner held a full hearing on the anti-harassment petition. 2A RP at 225. Mr. Rice attended the hearing. He was argumentative. He called Beach a liar, told her he would send her to hell, and threatened to sue her. 2A RP at 230. The State played a portion of the hearing at trial. 2A RP at 259-268. The court issued a full civil anti-harassment order. The order prohibited Mr. Rice from making any effort to contact Beach. 2A RP at 269. Thereafter, Mr. Rice wrote a letter to Beach. He addressed it to her at the jail. The letter came into the custody of a jail sergeant who then gave it to a deputy. 2A RP at 314.

Mr. Rice was tried on the Third Amended Information as it related to his interaction with Beach and other law enforcement officers. After hearing the State's case, the court dismissed a felony stalking charge (Count 1). 3A RP at 455. Mr. Rice did not object to any of the to-convict instructions. 3A RP at 481. The jury convicted Mr. Rice of the three

remaining charges: misdemeanor Stalking (Count 2);¹ Felony Harassment (Count 3);² and Violating a Protection Order (Count 4).³ CP 29-31.

The court sentenced Mr. Rice to a standard range sentence on the Felony Harassment to run concurrent to the two misdemeanors. The two misdemeanors were ordered to run consecutive to each other. He was sentenced to the maximum 364 day sentence on each with 184 days suspended and 48 months of total probation with multiple conditions. CP 34, 44. Mr. Rice did not object to the 48 months of probation or any condition of his sentence. 3B RP at 640.

Mr. Rice filed a timely appeal. CP 32.

D. ARGUMENT

1. MR. RICE'S FELONY HARASSMENT CONVICTION VIOLATED HIS FOURTEENTH AMENDMENT RIGHT TO DUE PROCESS BECAUSE THE EVIDENCE WAS INSUFFICIENT FOR CONVICTION.

Constitutional violations are reviewed de novo. *Bellevue School Dist. v. E.S.*, 171 Wn.2d 695, 702, 257 P.3d 570 (2011). Evidence is insufficient to support a conviction unless, when viewed in the light most favorable to the State, any rational trier of fact could find the essential

¹ RCW 9A.46.110(1)

² RCW 9A.46.020(2)(b)(ii)

³ RCW 10.14.170

elements of the crimes beyond a reasonable doubt. *State v. Engel*, 166 Wn.2d 572, 576, 210 P.3d 1007 (2009.)

To obtain a conviction for Felony Harassment, the State was required to prove that Mr. Rice committed four elements:

- (1) That on or about December 16, 2011, [he] knowingly threatened to kill Scott Bain immediately or in the future;
- (2) That the words or conduct of [Mr. Rice] placed Scott Bain in reasonable fear that the threat to kill would be carried out;
- (3) That [Mr. Rice] acted without lawful authority; and
- (4) That the threat was made or received in the State of Washington.

CP 23 (Instruction 15); RCW 9A.46.110(5)(a).

On December 15, 2011, Deputies Bain and Hafer were directed by their sergeant to find Mr. Rice and tell him to stop any effort to contact Custody Officer Jody Beach. On December 16, Deputy Hafer learned Mr. Rice was at the courthouse. He contacted Mr. Rice and took him into a conference room. Deputy Hafer told Mr. Rice in no uncertain terms to stop trying to contract Beach. Mr. Rice, who was intoxicated, got mad and became argumentative. 3A RP at 393-400.

Deputy Bain joined Mr. Rice and Deputy Hafer in the conference room. He took over trying to convince Mr. Rice that Beach was not interested in him. Deputy Bain's approach to Mr. Rice was more aggressive than that of Deputy Hafer. Per Deputy Bain, Mr. Rice looked

at him, became angry, and “began making death threats” and “telling me he was going to kill me.” 2A RP at 297. That continued for “some time.” 2A RP at 297. At one point, Deputy Bain stepped back and unsnapped his taser “not knowing what [Mr. Rice] was going to do, if anything” and [b]ecause he was causing me fear of an assault.” 2A RP at 298.

Deputy Bain and Mr. Rice talked back and forth about Mr. Rice’s perceived relationship with Beach. 2A RP at 298. After Mr. Rice made numerous threats to kill Deputy Bain, Deputy Bain decided to arrest Mr. Rice for “felony harassment.” 2A RP at 299. Deputy Bain was concerned about the “risk of assault” because Mr. Rice was screaming and yelling that “he’s going to kill me.” 2A RP at 299. Deputy Bain had another deputy step into the conference room. Mr. Rice stood up and was handcuffed and taken into custody without incident. 2A RP at 300-01.

Deputies Bain and Hafer walked Mr. Rice to the jail. Mr. Rice’s anger stayed the same or escalated. 2A RP at 301. Once they were in the jail’s booking area, Mr. Rice yelled that he was a Green Beret and would rip [Deputy Bain’s] fucking head off, that was a promise, and he wanted to step out into the parking lot and “settle things.” 2A RP at 302.

Mr. Rice was born in 1941 and suffers with Chronic Obstructive Pulmonary Disease (COPD). 3A RP at 430; CP 4. In cross-examination, Mr. Rice asked Deputy Bain if he thought “this little old man was going to

kill you that day?” Deputy Bain could not say that he did. Instead, he only said this:

He – he was in a different position that day. He was not quiet, content, sitting peacefully. He was extremely angry, livid. A -- a wild look to him. His – his eyes – he was extremely aggressive.

2A RP at 312.

Even in taking the evidence in the light most favorable to the prosecution, nothing about Deputy Bain’s explanations of his feelings or his actions suggests that he reasonably believed Mr. Rice was actually going to kill him. Instead, Deputy Bain reasonably believed only that Mr. Rice might assault him. Because the evidence is insufficient to prove that Deputy Bain reasonably believed Mr. Rice’s threat to kill him, Mr. Rice’s conviction violated his right to due process. *State v. C.G.*, 150 Wn.2d 604, 610, 80 P.3d 594 (2003) (insufficient evidence that high school vice-principal reasonably believed defendant student would kill him).. The conviction must be reversed and dismissed with prejudice. *Smalis v. Pennsylvania*, 476 U.S. 140, 144, 106 S.Ct. 1745, 90 L.Ed.2d 116 (1986).

2. MR. RICE’S CONVICTION FOR VIOLATING A PROTECTION ORDER CANNOT STAND BECAUSE HE WAS NOT CHARGED WITH THAT CRIME.

U.S. Const. Amend. 6 provides in part: “In all criminal prosecutions, the accused shall...be informed of the nature and cause of the accusation;....” Washington Const. Art. 1, § 22 (Amend. 10) provides that

“[i]n criminal prosecutions the accused shall have the right...to demand the nature and cause of the accusation against him.” Thus, an accused must be informed of the criminal charge he is to meet at trial and cannot be tried for an offense which has not been charged. *State v. Vangerpen*, 125 Wn.2d 782, 787, 888 P.2d 1177 (1995); *Auburn v. Brooke*, 119 Wn.2d 623, 627, 836 P.2d 212 (1992); *State v. Irizarry*, 111 Wn.2d 591, 592, 763 P.2d 432 (1988). This rule is subject to two statutory exceptions: (1) where a defendant is convicted of a lesser included offense of the one charged in the information (RCW 10.61.006); and (2) where a defendant is convicted of an offense which is a crime of an inferior degree to the one charged (RCW 10.61.003). *Irizarry*, 111 Wn.2d at 592.

Mr. Rice was tried on the Third Amended Information. CP 3-4. Count 4 of the amended information charged him with Violating a Civil Anti-harassment Order as follows:

That he, ROBERT WAYNE RICE, in the County of Clark, State of Washington, between January 20, 2012 and January 23, 2012 being a respondent age eighteen years or over, with knowledge that Clark County District Court had previously issued a temporary civil anti-harassment protection order or a civil anti-harassment protection order pursuant to Revised Code of Washington 10.14 in Cause No. 11-15224, prohibiting the Defendant from unlawful harassment, did willfully disobey the order while the order is in effect, contrary to the Revised Code of Washington 10.14.120 and 10.14.170.

CP 4. The basis for the charge was the letter Mr. Rice wrote to Beach in the jail in January 2012. 2A RP at 314-22.

The court instructed the jury that a finding of guilty could only be made upon proof of the following elements beyond a reasonable doubt.

- (1) That between January 20, 2012 and January 23, 2012, there existed a protection order applicable to the defendant;
- (2) That the defendant know of the existence of this order;
- (3) That on or about said date, the defendant knowingly violated a restraint provision of the order prohibiting acts or restraint provision of the order prohibiting contact with a protected party; and
- (4) That the defendant's act occurred in the State of Washington.

CP 26 (Instruction 18). This to-convict instruction is a standard WPIC (36.51) to be used for violations of RCW 26.50.110. In the comment section of WPIC 36.51, the instruction committee cautions against using WPIC 36.51 when the charge is an anti-harassment order violation:

Related court orders not covered by RCW 26.50.110. Anti-harassment orders under RCW Chapter 10.14 and child abuse restraining orders under RCW Chapter 26.44 are not covered under RCW 26.50.110. Moreover, the statutes for these two other types of orders use different language than RCW 26.50.110's in setting out the elements for prosecuting violations of those orders. For example, RCW 10.14.120 and RCW 26.44.150 refer only to "willful" violations of court orders and do not repeat the detailed knowledge requirements found in RCW 26.50.110. Practitioners in cases involving either of these other types of orders will need to carefully consider the drafting of appropriate instructions.

11 WA PRAC WPIC 36.51.

Mr. Rice did not object to the trial court giving the wrong to-convict instruction. However, Mr. Rice's claim that he was improperly convicted of an uncharged offense implicates the constitutional right to notice and may be raised for the first time on appeal. RAP 2.5(a)(3); *Vangerpen*, 125 Wn.2d at 787 (accused cannot be tried for offense not charged).

An erroneous instruction given on behalf of the party in whose favor the verdict was returned is presumed prejudicial unless it affirmatively appears that the error was harmless. *State v. Bray*, 52 Wn. App. 30, 34-35, 756 P.2d 1332 (1988). Here the error was not harmless as the jury was relieved of its obligation to find each of the elements of the charged offense and the anti-harassment violation is neither an inferior offense or a lesser included crime of the general violation of a protection order.

The appropriate remedy is reversal and remand for retrial. *State v. Anderson*, 96 Wn.2d 739, 744, 638 P.2d 1205 (1982).

3. THE TRIAL COURT HAD NO AUTHORITY TO IMPOSE TWO CONSECUTIVE TERMS OF 24 MONTHS OF PROBATION ON THE TWO MISDEMEANOR CONVICTIONS.

This Court has a duty to correct an erroneous sentence. *In re Pers. Restraint of Call*, 144 Wn.2d 315, 334, 28 P.3d 709 (2001); *State v. Toney*,

149 Wn. App. 787, 794, 205 P.3d 944 (2009) The misdemeanor sentences are erroneous because they require Mr. Rice to abide by probation and conditions of his judgment and sentence for 48 months rather the 24 months allowed by law.

A misdemeanor sentence can only be suspended if specifically authorized by statute. Under RCW 9.92.060 and RCW 9.95.210, the trial court has discretionary authority to suspend a defendant's sentence and place the defendant on probation. In Mr. Rice's case, as to Counts 2 and 4, the trial court suspended 182 days of the maximum 364 days on each count, ran the two counts consecutive to each other, and imposed 48 months probation and many terms and conditions of his sentence. CP 34-40.

However, in *State v. Parent*, 164 Wn. App. 210, 267 P.3d 358 (2011), Division One of this Court held a trial court could only impose 24 months of probation given this scenario. In reaching that conclusion, the *Parent* court found RCW 9.95.210 ambiguous as to the maximum length of probation when two or more offenses were involved. The statute reads:

(1)(a) Except as provided in (b) of this subsection in granting probation, the superior court may suspend the imposition or the execution of the sentence and may direct that the suspension may continue upon such conditions and for such time as it shall designate, not exceeding the maximum term of sentence or two years, whichever is longer.

The pivotal language is “not exceeding the maximum term of sentence or two years, whichever is longer.” *Parent*, 164 Wn. App. at 212. Parent interpreted that language to mean the judgment and sentence encompassed a total of 24 months representing the two consecutive 12-month terms of imprisonment. *Id.*, at 212-13. The State argued the “maximum term of sentence” language refers to the statutory maximum amount of time faced by a defendant on each individual count for which he received an individual sentence. *Id.*

The *Parent* court found support for both Parent’s and the State’s interpretation of RCW 9.95.210. As such, the court found the statute ambiguous and using the rule of lenity, applied the statute strictly against the State thereby adopting Parent’s rationale and limiting the total probationary sentence to 24 months. *State v. Breaux*, 167 Wn. App. 166, 176, 273 P.3d 447 (2012) (if a statute is ambiguous, the rule of lenity requires the court to interpret the statute in favor of the defendant absent legislative intent to the contrary.) This court should adopt the same rationale.

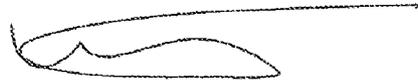
E. CONCLUSION

This Court should reverse and dismiss Mr. Rice’s Felony Harassment conviction for lack of sufficient evidence.

As to the order violation, that should be dismissed for lack of adequate notice and for charging one crime but convicting Mr. Rice of a different crime.

And finally, the misdemeanor judgment and sentence should be remanded to set his term of probation at no more than 24 months

Respectfully submitted this 25th day of January 2013.



LISA E. TABBUT/WSBA #21344
Attorney for Robert Wayne Rice

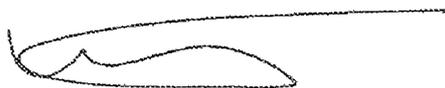
CERTIFICATE OF SERVICE

Lisa E. Tabbut declares as follows:

On today's date, I filed Appellant's Brief to: (1) Alan Harvey, Clark County Prosecutor's Office, at prosecutor@clark.wa.gov; (2) the Court of Appeals, Division II; and (3) I mailed it Robert Wayne Rice, Elahan Place, 7415 NE 94th Ave., Vancouver, WA 98662.

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

Signed January 25, 2013, in Longview, Washington.

A handwritten signature in black ink, appearing to read "Lisa E. Tabbut", with a long horizontal line extending to the right from the end of the signature.

Lisa E. Tabbut, WSBA No. 21344
Attorney for Robert Wayne Rice

COWLITZ COUNTY ASSIGNED COUNSEL

January 25, 2013 - 4:35 PM

Transmittal Letter

Document Uploaded: 434491-Appellant's Brief.pdf

Case Name: State v. Robert Wayne Rice

Court of Appeals Case Number: 43449-1

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: Appellant'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
- Petition for Review (PRV)
- Other: _____

Comments:

No Comments were entered.

Sender Name: Lisa E Tabbut - Email: lisa.tabbut@comcast.net

A copy of this document has been emailed to the following addresses:
prosecutor@clark.wa.gov