

NO. 44741-0-II

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

STATE OF WASHINGTON,
Respondent,

v.

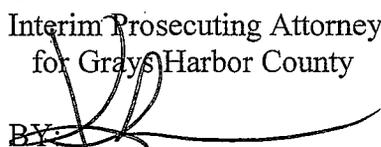
JOSE M. SEGOVIA-BARRERA,
Appellant.

APPEAL FROM THE SUPERIOR COURT OF THE STATE
OF WASHINGTON FOR GRAYS HARBOR COUNTY

THE HONORABLE F.MARK MCCAULEY and DAVID L. EDWARDS, JUDGES

BRIEF OF RESPONDENT

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COUNTER STATEMENT OF THE CASE

Stephanie Hahn and the appellant started a romantic relationship in 2006. RP at 161. On August 29, 2007, Hahn gave birth to their daughter, B.S. RP at 162. Hahn and the appellant eventually married on June 10, 2012. RP at 162. Hahn described this relationship as being one where they “would argue a lot and split up and then [the appellant] would move back in.” RP at 162. Shortly after the marriage, Segovia-Barrera moved out for the last time. RP at 162. Hahn married Segovia-Barrera to help him with his immigration status as she didn’t want him to be deported and removed from the children. RP at 184. In fact, Hahn’s step-father, Jim Coon, posted the bond that allowed Segovia-Barrera to remain out while his immigration case was pending. RP at 186.

Hahn did not limit the appellant’s time with B.S. or her brother. RP at 163. However, she did see a change in B.S.’s demeanor. B.S. was angry and was acting out. RP at 163. About a week before B.S. disclosed that the appellant had abused her, Hahn noticed an odor to B.S.’s genital region that she described as “a foul smell coming from private [sic]” RP at 164.

One day while watching T.V., Hahn observed B.S. “humping on something.” RP at 164. Hahn asked what she was doing, and B.S. pulled a

nail polish bottle away from her crotch. B.S. told Hahn that “daddy showed her and that [Hahn]’ll be mad at her.” RP at 164. Hahn told B.S. that the behavior was not okay, and then she dropped it as B.S. seemed “really embarrassed.” RP at 164-65.

Later, B.S. told Hahn that, at her grandmother’s house, the appellant had “got on the couch with her, and she did like a humping movement, and she said that it hurt and that it puked on her and it looked like milk.” RP at 165. Hahn reported this to the police and CPS. RP at 166.

Because the appellant was not immediately arrested, Hahn’s boyfriend, James Griffin, felt that “the cops weren’t protecting” Hahn and her children. RP at 187. Griffin ended up spraying the appellant with pepper spray and cutting his throat with a razor blade. RP at 187. After this assault, Griffin fled to California where Hahn met up with him. RP at 187.

Upon their return to the state, Hahn tried to claim responsibility for the assault. RP at 188. She stated that she felt she needed to protect Griffin and that she felt guilty because he had acted to defend her daughter. RP at

188. Hahn admitted that B.S. gave a correct statement of what occurred the day of the assault. RP at 188-89.

Due to the subsequent assault on the appellant committed by Hahn's boyfriend, Hahn did not have unsupervised contact with B.S. between the disclosure and the trial. RP at 166.

B.S. testified that her dad "did something wrong." RP at 155. "He put his – where boys go potty and where girls go potty." RP at 156. This happened at her grandma's house in the living room. RP at 156. B.S. said she was on the couch trying to nap when her dad "woke me up and then he put his stuff where he goes potty." RP at 156. This was fleshed out as follows:

B.S.: Where girls go potty.

State: And then what happened after he put where his boys go potty and where girls go potty?

B.S.: In our private parts.

State: And then did anything after his private –

B.S.: He – he just had dinner and then went to bed.

State: Okay. And is there anything that you remembered about his private part, did that change at all?

B.S.: No.

State: And did – was there – did your daddy get a towel, did you tell somebody that?

B.S.: He wiped his stuff off me.

RP at 157.

B.S. was also asked if anyone told her what to say in court. She said she was told to “[t]ell the truth and don’t lie and to sit by myself.” RP at 160.

Peggy Coon is the grandmother of B.S. and the mother of Stephanie Hahn. RP at 191. Coon and B.S. are “together a lot” and “very, very close.” RP at 191. On July 29, 2012, Coon was outside with B.S. and her brother at their house. The kids wanted to show Coon that they could ride their bikes. RP at 192. B.S. suddenly just sat on her bike with her head down and then told Coon that her “daddy did this to me (indicating)¹ and it puked on me.” RP at 192. Coon just reassured B.S. and told her that no one should touch her “nina.” RP at 192.

On July 30, 2012, B.S. was forensically interviewed by Grays Harbor Detective Ed McGowan. RP at 215. The video of this interview was shown to the jury as Exhibit 4.

¹ Coon clarified that this motion was her rubbing her hands between her thighs. RP at 194.

On August 1, 2012, Dr. Laurie Davis, of Providence St. Peter's Sexual Assault and Child Maltreatment Clinic in Olympia, conducted an examination of B.S. RP at 110. During this examination, it was determined that B.S. calls her genital area "nina" and male genitalia "pina." RP at 112. B.S. told Dr. Davis that she had seen her dad's pina and drew it onto stick figure drawing. RP at 112.

B.S. related that this happened at her grandmother's house while she was watching T.V. in the living room. B.S. said her and her dad's pants were off and his pina was out. B.S. described that her dad was on the side of her and the he went up and down. B.S. said her dad's pina "puked" and that it was white. She then told Dr. Davis that her dad got a towel and cleaned it off. RP at 114. Dr. Davis found that B.S.'s statement that this "hurt" was significant due to the very sensitive nature of a pre-pubescent child's hymen. RP at 114-115.

During the physical portion of the examination, Dr. Davis examined B.S.'s genital area with the aid of a colposcope. This revealed a "notch" in B.S.'s hymen at about the 5 o'clock position. RP at 115. She testified that less than 5% of children have any physical findings after sexual abuse, so this was concerning. RP at 115.

B.S.'s mother also completed questionnaires for the Child Sexual Behavior Inventory. These inventories show if a child's sexualized behaviors fall within the norm for their age. RP at 118. Out of the three tests, B.S. scored significantly high on two of them, which Dr. Davis categorized as "concerning." RP at 118-119.

Melanie Hahn is B.S.'s aunt and Stephanie Hahn's sister. RP at 197. In September 2012, Melanie was giving B.S. a bath and B.S. told her "daddy is in jail for touching my nina." RP at 197. B.S. then asked "Auntie Mel, is it okay for boys to touch girls' ninas?" RP at 198. Melanie told that it was not okay and let the issue drop. Melanie testified that B.S. would occasionally bring up that her dad was in jail for touching her, but Melanie did not question B.S. about what happened or bring it up to her. RP at 198.

Brittany Dortch-Lane is also B.S.'s aunt and Stephanie Hahn's sister. RP at 202. Dortch-Lane became B.S.'s legal guardian and placement on August 1, 2012, when Hahn left the state. RP at 203. Dortch-Lane testified that B.S. would randomly bring up her daddy and state that he was in jail because he touched her nina. RP at 203. B.S. told

her that it had happened in her house when her mom was gone and on her grandmother's couch. RP at 204.

Jasmin Coleman is a family friend and lived with Dortch-Lane during the time she had custody of B.S. RP at 207-08. As with her aunts, B.S. told Coleman that her daddy was in jail because he had touched her. B.S. told Colman this on more than one occasion. RP at 208.

RESPONSE TO ASSIGNMENTS OF ERROR

The child hearsay evidence was properly admitted.

The appellant first contends that the trial court erred by admitting evidence of B.S.'s hearsay statements. Specifically, Segovia-Barrera argues that the Court should reverse his first degree child molestation conviction because the trial court failed to evaluate all nine *Ryan* factors for determining the reliability of child hearsay statements. However, as the evidence presented at the child hearsay hearing supports the trial court's conclusion that B.S.'s hearsay statements were reliable and thus admissible under RCW 9A.44.120, the Court should deny the appeal on this issue.

A trial court's decision to admit child hearsay evidence is reviewed for an abuse of discretion. *State v. Borboa*, 157 Wn.2d 108, 121, 135 P.3d

469 (2006). A trial court abuses its discretion if its decision is manifestly unreasonable or exercised on untenable grounds or for untenable reasons.

State v. Rohrich, 149 Wn.2d 647, 654, 71 P.3d 638 (2003). The child hearsay statute, RCW 9A.44.120, governed the admissibility of B.S.'s out-of-court statements and provides in relevant part:

A statement made by a child when under the age of ten describing any act of sexual contact performed with or on the child by another, describing any attempted act of sexual contact with or on the child by another, or describing any act of physical abuse of the child by another that results in substantial bodily harm as defined by RCW 9A.04.110, not otherwise admissible by statute or court rule, is admissible in evidence in dependency proceedings under Title 13 RCW and criminal proceedings, including juvenile offense adjudications, in the courts of the state of Washington if:

(1) The court finds, in a hearing conducted outside the presence of the jury, that the time, content, and circumstances of the statement provide sufficient indicia of reliability; and

(2) The child either:

(a) Testifies at the proceedings; or

(b) Is unavailable as a witness: PROVIDED, That when the child is unavailable as a witness, such statement may be admitted only if there is corroborative evidence of the act.

....

Because B.S. testified at trial, the issue before the Court is whether her statements were sufficiently reliable to be admitted through the testimony of Stephanie Hahn, Brittany Dortch-Lane, Peggy Coon, Jasmin

Coleman, and Detective McGowan. In determining whether the time, content, and circumstances of a child's hearsay statements provide sufficient indicia of reliability, a trial court applies the nine *Ryan* factors. *State v. Woods*, 154 Wn.2d 613, 623, 114 P.3d 1176 (2005) (citing *Ryan*, 103 Wn.2d 165). Those factors include:

(1) whether the child had an apparent motive to lie, (2) the child's general character, (3) whether more than one person heard the statements, (4) the spontaneity of the statements, (5) whether trustworthiness was suggested by the timing of the statement and the relationship between the child and the witness, (6) whether the statements contained express assertions of past fact, (7) whether the child's lack of knowledge could be established through cross-examination, (8) the remoteness of the possibility of the child's recollection being faulty, and (9) whether the surrounding circumstances suggested the child misrepresented the defendant's involvement.

Woods, 154 Wn.2d at 623 (citing *Ryan*, 103 Wn.2d at 175–76. A trial court need not determine that every *Ryan* factor is satisfied before admitting child hearsay evidence under RCW 9A.44.120; it is sufficient if the evidence before the trial court shows that the *Ryan* factors are “substantially met.” *State v. Swan*, 114 Wn.2d 613, 652, 790 P.2d 610 (1990).

Here, Segovia-Barrera focuses on evidence he claims shows “B.S. had a clear motive to lie” and “the suspicious timing of B.S.’s disclosure to correspond with Hahn’s efforts to sever ties with Segovia-Barrera.”

Brief of Appellant at 7. However, the evidence that the appellant references was not elicited at the child hearsay hearing, this information was only presented at the trial.

Based on the evidence produced at the child hearsay hearing, there was no motive for B.S. to lie. Even considering the additional evidence presented at the trial, there was still no motive established for B.S. to lie. It was Ms. Hahn and Mr. Griffin that perpetrated the crime against the appellant, so they had a motive to lie; however, B.S. did not. In fact, the statement B.S. gave to the police went against the admittedly false confession made by her mother. It was B.S.'s statement that was supported by the physical evidence and the statement of the appellant. No evidence at the child hearsay hearing or the trial showed that B.S. was ever untruthful.

Ocean Shores Police Sergeant McManus took the false confession from Ms. Hahn. His testimony was that when he asked Ms. Hahn "if she was telling me that [B.S.] was lying" that "her reply was that what [B.S.] had apparently reported was not true and she believes someone else may have coached [B.S.] to say that." RP at 251. There is no evidence to contradict the trial court's finding the B.S. had no motive to lie.

Segovia-Barrera argues only that the trial court abused its discretion by admitting B.S.'s hearsay statements by “cherry-pick[ing] the factors it felt merited a finding of reliability and ignor[ing] evidence of the other factors.” Appellant’s Brief at 8. But a trial court need not find that every Ryan factor weigh in favor of reliability, so long as the factors are “substantially met.” *Swan*, 114 Wn.2d at 652. Moreover, the Court will affirm a trial court's admission of child hearsay evidence where the reliability of the evidence is apparent from the record. *State v. Stevens*, 58 Wn.App. 478, 487, 794 P.2d 38 (1990). Here, the record contains sufficient evidence that the Ryan factors were substantially met and, thus, the trial court did not abuse its discretion by admitting those statements at trial.

In this case, the trial court did consider all of the factors. They were addressed as follows:

- (1) **B.S. has no motive to lie about the sexual abuse.** Finding of Fact 32. (whether the child had an apparent motive to lie);
- (2) **There is nothing in the general character of B.S. which indicates a propensity to lie.** Finding of Fact 33. (the child's general character);
- (3) **More than one person heard B.S.’s statements and B.S.’s statements remained consistent during her disclosures to**

[five other witnesses]. Finding of Fact 34. (whether more than one person heard the statements);

- (4) **B.S.'s statements were spontaneous. There was nothing leading or suggestive by any of the adults to whom B.S. spoke which would suggest the statements were anything other than spontaneous.** Finding of Fact 35. (the spontaneity of the statements);
- (5) **There is nothing in the relationship between B.S. and the people to whom she disclosed that indicates any sort of untrustworthiness concerning the statements.** Finding of Fact 36. (whether trustworthiness was suggested by the timing of the statement and the relationship between the child and the witness);
- (6) **B.S. disclosures contained expressed assertions of the sexual assault.** Finding of Fact 37. (whether the statements contained express assertions of past fact);
- (7) **The child testified at trial.** (whether the child's lack of knowledge could be established through cross-examination);
- (8) **The court finds no evidence that B.S.'s recollection of the events is faulty and her testimony was not exaggerated or over amplified.** Finding of Fact 38. (the remoteness of the possibility of the child's recollection being faulty); and (whether the surrounding circumstances suggested the child misrepresented the defendant's involvement).

CP at 31-38. These were further addressed via the trial court's oral ruling finding that ultimately "I didn't hear one bit of testimony either in direct examination or cross examination that caused me to be concerned that

there is a lack of reliability to the circumstances under which the statements were made.” RP at 68.

In the end, it is within the trial court’s discretion to evaluate the credibility of the witnesses and decide, under the totality of the evidence, where to place the most weight on the above factors. Further, the jury is the final arbiter of the weight and credibility to give witnesses and other evidence. The appellant disagrees with the outcome; however there is no basis to find that the trial court abused its discretion.

The State’s closing argument was proper.

Segovia-Barrera next contends that prosecutorial misconduct during closing deprived him of a fair trial.

In this case, the appellant claims that the State’s closing argument “constituted egregious prosecutorial misconduct that denied [the appellant] a fair trial.” Appellant’s Brief at 9. However, there is nothing in the record that supports this contention. The appellant references one specific statement made by the prosecutor and then glosses to a conclusion that “[b]y repeatedly emphasizing the emotionally charged nature of the allegations, the prosecutor inappropriately focused the jury’s emotions and prejudices against Segovia-Barrera.” Appellant’s Brief at 8, 10.

The specific portion of the State's rebuttal referenced by the appellant is as follows:

What you're here to decide is do you believe [the victim]. And do you believe the things that she has said over and over again. Does that – the child that sat here and testified to you, does she seem coached? Five years old. And you can put yourself in her shoes, how you would feel as adults taking that seat in front of strangers and talking about something so personal. You judge her credibility. If you don't believe what [she] said, you should find Mr. Segovia not guilty.

RP at 273.

When put into context, the statement cited to by the appellant is a proper argument regarding evaluating the credibility of the child witness. Contrary to the appellant's assertion, the State did not make any improper statements or appeal to the passions or prejudices of the jury.

The State did not make, nor does the appellant cite to, any arguments that emphasize the "emotionally charged nature" of the allegations. A case alleging the sexual assault of a four year old child by an adult will obviously engender a certain emotional response from a person; however, the State did not make any argument that attempted to improperly capitalize on this emotion or to override the jury's duty to decide the case on its merits.

Further, the jury was instructed that “the lawyers’ statements are not evidence” and that they “must reach [a] decision based on the facts proved...and on the law given...not on sympathy, prejudice, or personal preference.” CP at 40-41.

To establish prosecutorial misconduct, the appellant must first show that the prosecutor's statements were improper, and then show that he was prejudiced as a result. *State v. Emery*, 174 Wn.2d 741, 759–65, 278 P.3d 653 (2012). However, “[i]f the defendant did not object at trial, the defendant is deemed to have waived any error, unless the prosecutor's misconduct was so flagrant and ill-intentioned that an instruction could not have cured the resulting prejudice.” *Emery*, 174 Wn.2d at 760–61. “The absence of an objection by defense counsel ‘strongly suggests to a court that the argument or event in question did not appear critically prejudicial to an appellant in the context of the trial’” *State v. Swan*, 114 Wn.2d 613, 661, 790 P.2d 610 (1990). “Under this heightened standard, the defendant must show that (1) ‘no curative instruction would have obviated any prejudicial effect on the jury’ and (2) the misconduct resulted in prejudice that ‘had a substantial likelihood of affecting the jury verdict.’” *Emery*, 174 Wn.2d at 761 (quoting *State v. Thorgerson*, 172 Wn.2d 438, 455, 258

P.3d 43 (2011)). In making this determination, we “focus less on whether the prosecutor's misconduct was flagrant or ill-intentioned and more on whether the resulting prejudice could have been cured.” *Emery*, 174 Wn.2d at 762.

To determine whether the remarks were prejudicial the Court must analyze them in context, taking into consideration the total argument, the issues in the case, the relevant evidence, and the jury instructions. *State v. Brown*, 132 Wn.2d 529, 561, 940 P.2d 546 (1997). If the court is satisfied that the outcome of the trial would not have been different had the alleged error not occurred, given all the evidence, then the error is harmless. *State v. Rogers*, 70 Wn. App. 626, 631, 855 P.2d 294 (1993).

The appellant cannot show that this argument was improper, and, if it were improper, he cannot show that he was prejudiced by the argument. Any error was rectified by the trial court's proper instruction of the jury.

Legal Financial Obligations.

The trial court ordered the appellant to pay \$1,300 in legal financial obligations (LFO), including a \$100 crime lab fee and \$500 for court-appointed counsel. Section 2.5 of the judgment and sentence contains the language: “The court has considered the total amount owing,

the defendant's present and future ability to pay legal financial obligations, including the defendant's financial resources and the likelihood that the defendant's status will change." CP at 60. The appellant did not object to these LFO at the time of sentencing.

Court Appointed Counsel Cost

Under RCW 10.01.160(3), "[t]he court shall not order a defendant to pay costs unless the defendant is or will be able to pay them. In determining the amount and method of payment of costs, the court shall take account of the financial resources of the defendant and the nature of the burden that payment of costs will impose." The Washington Supreme Court has made several things clear about this statute. First, the sentencing court's consideration of the defendant's ability to pay is not constitutionally required. *State v. Blank*, 131 Wash.2d 230, 241-42, 930 P.2d 1213 (1997) ("the Constitution does not require an inquiry into ability to pay at the time of sentencing"). Accordingly, the issue raised by the appellant is not one of constitutional magnitude that can be raised for the first time on appeal under RAP 2.5(a).

Second, the imposition of costs under this statute is a factual matter "within the trial court's discretion." *State v. Curry*, 118 Wash.2d 911, 916,

829 P.2d 166 (1992). Failure to identify a factual dispute or to object to a discretionary determination at sentencing waives associated errors on appeal. *In re Pers. Restraint of Goodwin*, 146 Wash.2d 861, 874–75, 50 P.3d 618 (2002); *In re Pers. Restraint of Shale*, 160 Wash.2d 489, 494–95, 158 P.3d 588 (2007). The appellant's failure to object below thus precludes review.

Finally, “[n]either the statute nor the constitution requires a sentencing court to enter formal, specific findings” regarding a defendant's ability to pay. *Curry*, 118 Wn.2d at 916, 829 P.2d 166. The boilerplate finding is therefore unnecessary surplusage. If a challenge to the court's discretion were properly before the Court, striking the boilerplate finding would not require reversal of the trial court's discretionary decision unless the record affirmatively showed that the defendant had an inability to pay both at present and in the future.

Therefore, the imposition of a \$500 fee for court appointed counsel was appropriate.

Crime Lab Fee

RCW 43.43.690(1) allows that “[w]hen a person has been adjudged guilty of violating any criminal statute of this state and a crime

laboratory analysis was performed by a state crime laboratory...the court shall levy a crime laboratory analysis fee of one hundred dollars.

In this case, no crime laboratory analysis was done, so this fee was erroneous and the State does not object to it being stricken from the judgment and sentence.

CONCLUSION

The appellant makes several claims that are simply not supported by the record. He claims that “[t]o prove its case, the State relied exclusively on hearsay evidence regarding statements B.S. purportedly made to her family members and other adults.” Brief of Appellant at 4. However, this is just not true. B.S. herself testified at trial, and the State presented the testimony of Dr. Laurie Davis concerning the finding of a “notch” in B.S.’s hymeneal tissue and her high scores on the Child Sexual Behavior Inventory. RP at 115-118.

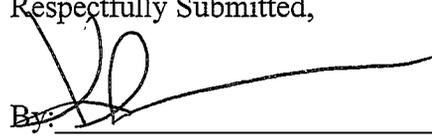
The appellant also fails to support his claims regarding the State’s closing argument with any citation to the record. The one cited comment was taken out of context, and there is nothing in the record to support his contention that the argument was improper.

Lastly, the State concedes the crime lab fee should be removed from the appellant's LFO. However, the imposition of the attorney's fees was a proper exercise of the trial court's discretion.

Thus, the appeal in this case should be denied, and the verdict of the jury affirmed. The trial court should be directed to strike the crime lab fee from the appellant's LFO.

DATED this 14 day of March, 2014.

Respectfully Submitted,

By: 

KATHERINE L. SVOBODA
Chief Criminal Deputy

GRAYS HARBOR COUNTY PROSECUTOR

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