

1. | IN THE COURT OF APPEALS  
2. | OF THE STATE OF WASHINGTON  
3. | DIVISION II.

4. | Eugene Garvie,  
5. | Petitioner

COA No.45329-1-II  
Super Ct No.13-2-00091-9

6. | v.

7. |  
8. | Washington State  
9. | Department Of Corrections,  
Respondant

Opening Brief Of Petitioner

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11. |  
12. | I. INTRODUCTION

FILED  
COURT OF APPEALS  
DIVISION II  
2014 JAN -2 PM 2:07  
STATE OF WASHINGTON  
BY  
DINITY

14. | Petitioner, Eugene Garvie appearing pro se, filed a series  
15. | of requests for public disclosure pursuant to RCW 42.56 et seq.,  
16. | starting on February 5, 2011. There were four requests made which  
17. | were assigned the tracking numbers of: PDU-14345, 19078, 20589,  
18. | and 20850 by the Washington Dept. of Corrections' Public  
19. | Disclosure Unit. All four of these requests ask for essentially  
20. | the same records, were made in succession in response to the  
21. | State's actions, and should for all rationale purposes be treated  
22. | as one ongoing request by Mr Garvie. The records sought by Mr  
23. | Garvie were phone recordings between himself and another  
24. | individual which could be used to help demonstrate his innocence  
25. | and correct a fundamentally unjust incarceration.

1. | At first the WDOC-PDU acknowledged the existence of the  
2. | phone recordings but claimed an exemption from disclosure under  
3. | RCW 9.73.095(3). An exemption which in the case at hand makes no  
4. | sense because Mr Garvie is one of the parties being recording and  
5. | both parties involved consented to the recording through the  
6. | institutional phone system. However, WDOC-PDU insisted the  
7. | exemption and refused to disclose without a court order directing  
8. | them to produce the record.

9. |  
10. | The WDOC had new charges instituted against Mr Garvie on the  
11. | basis of the phone calls. This allowed them to remove all his  
12. | legal materials from him. They shipped him to the Snohomish  
13. | County Jail in Everett, WA. While at Snohomish County Mr Garvie  
14. | was able to obtain a court order compelling WDOC to provide him  
15. | the responsive records he had been seeking through public  
16. | disclosure. In response, WDOC-PDU and Mr Wayman of the SCCC's I&I  
17. | Dept., claimed the records no longer existed in correspondence to  
18. | both the prosecutor's and public defender's offices as their  
19. | response to the Superior Court's Order to Compell.

20. |  
21. | Mr Garvie filed another public disclosure for the records.  
22. | Once again the WDOC-PDU said the records existed but were exempt  
23. | without a court order. WDOC-PDU was also not acknowledging the  
24. | previous Order by the Snohomish County Superior Court which

1. | already compelled them to produce the records. It would appear  
2. | that these records could magically appear and disappear at will  
3. | and can also ignore court orders if it suits them.

4. |  
5. |         This process went back and forth with the WDOC-PDU forcing  
6. | Mr Garvie to have to exhaust his own ingenuity to ferret out  
7. | record through a combination of his own intuition and dilligent  
8. | reserch. All the while failing to comply with the previous order  
9. | compelling disclosure. These actions were done in bad faith and  
10. | are analogous with and amount to a silent withholding of the  
11. | requested records. Finally on April 13, 2013 the WDOC-PDU  
12. | produced a copy of the repeatedly requested records after an  
13. | attorney obtained a subpoena duces tecum compelling WDOC-PDU the  
14. | second time to produce the record.

15. |  
16. |         The WDOC-PDU's actions in dragging out the process of  
17. | disclosing the requested public records to Mr Garvie for over two  
18. | years demonstrates bad faith and demonstrates non-compliance with  
19. | both the letter and spirit of the PRA, RCW 42.56 et seq. Mr  
20. | Garvie inexpertly sought penalties for the violations of the PRA  
21. | in the Thurston County Superior Court which granted summary  
22. | judgement to the State on the basis of a balkanized rather than a  
23. | wholeistic analysis. Mr Garvie now seeks review of that ruling in  
24. | the interest of justice.

25. |  
26. |

1. | II. ISSUES PRESENTED

2. |

3. | 1. Did the WDOC-PDU violate the PRA in the way it dragged the  
4. | disclosure of Mr Garvies request for disclosure of Public Records  
5. | under RCW 42.56 et out to over two years?

6. |

7. | 2. Did the WDOC-PDU act in bad faith when it did not produce the  
8. | requested records when the Snohomish County Superior Court issued  
9. | an order compelling production and then falsely asserted that the  
10. | records did not exist to the court?

11. |

12. | 3. Should the trial court have dealt with Mr Garvies four PRA  
13. | requests as if they were only one request since they dealt with  
14. | the same requested information and demonstrate Mr Garvie having  
15. | to exhaust his own resourcefulness, intuition and dilligent  
16. | research in trying to obtain the requested records?

17. |

18. | 4. Should all of Mr Garvie's PDA requests for the same  
19. | information be equitably tolled due to affirmative misconduct by  
20. | the WDOC until April 13, 2013?

21. |

22. | 5. Did the trial court individually and cummulatively abuse it's  
23. | discretion in awarding the WDOC summary judgement?

24. |

25. |

26. |

1. | III. FACTS RELEVANT TO PETITION

2. |  
3. |         3.1 Petitioner has a well-established right to challenge the  
4. | validity of his conviction under the Constitutions of the United  
5. | States and Washington State.  
6. |

7. |         3.2 In challenging the lawfulness of his conviction Mr  
8. | Garvie must provide the State with evidence as to his actual  
9. | innocence since the State threatened him and scared him into  
10. | taking a plea bargain.  
11. |

12. |         3.3 In trying to obtain such evidence Mr Garvie sought to  
13. | obtain phone conversations that took place between Mr Tyson Metz  
14. | and Plaintiff, Eugene Garvie at telephone No. 360-630-5612 while  
15. | Mr Garvie was at the Snohomish County Jail and Stafford Creek  
16. | Corrections Center, Aberdeen, Washington between March 10, 2010  
17. | and February 5th, 2011.  
18. |

19. |         3.4 On February 14th, 2011, Mr Garvie filed a request for  
20. | public disclosure pursuant to RCW 42.56 et seq., seeking copies  
21. | of the recordings of the phone calls described in paragraph 3.3.  
22. | The Washington DOC Public Disclosure Unit (WDOC-PDU), responded  
23. | on February 23rd, 2011, which is beyond the five-day prompt  
24. | response requirement of RCW 42.56.520 and given the tracking  
25. | number of PDU-14345.  
26. |

1. |           3.5 Once Mr Garvie sought to obtain copies of the recorded  
2. | phone conversations through a request for disclosure of public  
3. | records pursuant to RCW 42.56 et seq., the WDOC is required to  
4. | maintain and not destroy the recording for six (6) years.

5. |  
6. |           3.6 On March 2, 2011 the WDOC-PDU denied Mr Garvie access to  
7. | the records he requested in PDU-14345 as an exception pursuant to  
8. | RCW 9.73.095(3)(b) and RCW 42.56.070(1).

9. |  
10. |           3.7 Petitioner appealed the exception and was denied on  
11. | April 12th, 2011 pursuant to the same statutory provisions.

12. |  
13. |           3.8 WDOC took prison disciplinary actions against Mr Garvie  
14. | for serious (major infractions), and found him guilty on the  
15. | basis of his having violated a no-contact order which did not  
16. | exist. DOC also confiscated Mr Garvie's personal and legal  
17. | property including the files regarding PDU-14345 then refused to  
18. | return it claiming to have lost the property.

19. |  
20. |           3.9 Mr Garvie was also at the WDOC's initiation sent back to  
21. | the Snohomish County Superior Court to face new criminal charges  
22. | (Cause No.11-1-01780-4), for making the phone calls he had sought  
23. | to receive copies of in PDU-14345.

24. |  
25. |  
26. |

1. |           3.10 While at the Snohomish County Jail Mr Garvie filed  
2. | another request for public disclosure which was assigned tracking  
3. | number PDU-19078, in February 2012, the WDOC-PDU filed a late  
4. | response on February 17th, 2012 which was denied as an exception  
5. | pursuant to RCW 9.73.095(3)(b).

6. |

7. |           3.11 During the course of proceedings under Cause No. 11-1-  
8. | 01780-4, Mr Garvie filed a Motion To Compel DOC to Provide Phone  
9. | Call Recordings. The Snohomish County Superior Court issued an  
10. | Order Compelling Disclosure Of the Phone Records which correspond  
11. | to the records requested in PDU-14345.

12. |

13. |           3.12 The WDOC respond to the Snohomish County Superior  
14. | Court's Order to Compelling Disclosure on April 30, 2012 stating  
15. | that there were no records responsive to this Order.

16. |

17. |           3.13 The Snohomish County Superior Court subsequently  
18. | dismissed the charges against Mr Garvie with prejudice.

19. |

20. |           3.14 Mr Garvie filed another request for disclosure of  
21. | public records asking for all the contents of PDU-14345. This  
22. | request was issued the tracking number PDU-20589. WDOC did not  
23. | produce nor did Mr Garvie receive all the contents of PDU-14345  
24. | in response to his request.

25. |

26. |

1. |           3.15 Mr Garvie filed another request for disclosure of  
2. | public records on June 29, 2012. The WDOC-PDU responded on July  
3. | 9, 2012 and assigned it the tracking number PDU-20850.

4. |  
5. |           3.16 The WDOC-PDU claimed exemption of the requested records  
6. | and closed PDU-20850 on August 27, 2012. Mr Garvie appealed and  
7. | WDOC-PDU denied his appeal on October 12, 2012 under RCW  
8. | 0.73.095(3)(b) and RCW 42.56.070(1).

9. |  
10. |           3.17 All of Mr Garvies requests for public records (PDU's  
11. | 14345, 19078, 20589, & 20850) asked for essentially the same  
12. | public records.

13. |  
14. |           3.18 In all of the WDOC-PDU's claims of exemption they on  
15. | cite to the applicable statute and did not give any explanation  
16. | for the exemption.

17. |  
18. |           3.19 On April 9, 2013, in response to a Subpeona Duces  
19. | Tecum, #11-1-01780-4 the WDOC-PDU finally produced a disk  
20. | containing the phone calls which Mr Garvie had been seeking since  
21. | February 14, 2011. For which the WDOC-PDU and Mr Weyman from the  
22. | SCCC I&I unit had filed false declarations, that the requested  
23. | records did not exist during Snohomish County Superior Court in  
24. | Cause Number 11-1-01-01780-4 in April 2012 in response to the  
25. | Court's Order Compelling them to produce on April 23, 2012.

26. |

1. | IV. ARGUMENT & PRESENTATION OF LAW

2. |  
3. | 1. Trial Courts Can Abuse Their  
4. | Discretion In Many Ways

5. |  
6. | See e.g., State v Dixon 159 Wn2d 65, 91-92, 147 P.3d 991, 996  
7. | (2006)(En Banc)

8. |  
9. | "The reviewing court will find an abuse of discretion  
10. | 'when the trial court's decision is manifestly unreasonable,  
11. | or is exercised on untenable grounds, or for untenable  
12. | reasons.'" [State v Russell, 125 Wn2d at 92]. A decision is  
13. | based 'on untenable grounds' or made for 'untenable reasons'  
14. | if it rests on facts unsupported in the record or was  
15. | reached by applying the wrong legal standard. A decision is  
16. | 'manifestly unreasonable' if the court, despite applying the  
17. | correct legal standard to the supported facts, adopts a view  
18. | 'that no reasonable person would take,' and arrives at a  
19. | decision 'outside the range of acceptable choices.' State v  
20. | Rohrich, 149 Wn2d 647, 654, 71 P.3d 638 (2003)(citations  
21. | omitted)."

22. |  
23. | See also e.g., Skagit Cnty Public Hosp. Dist No 304 v Skagit Cnty  
24. | Public Hosp Dist No 1, 177 Wn2d 718, 730, 305 P.3d 1079, 1085  
25. | (2013)(En Banc)(citing, In re Marriage of Littlefield, 133 Wn2d  
26. | 39, 46-47, 940 P.2d 1362 (1997)).

27. |  
28. | 2. Appellate Courts Can Also Apply  
29. | Equitable Principles & Common Law  
30. | In The Interest of Justice

31. |  
32. | See e.g., RAP 1.2 which says in pertinent part:  
33. |  
34. |

1. | "(a) Interpretation. These rules will be liberally  
2. | interpreted to promote justice and facilitate the decision  
3. | of cases on the merits. Cases and issues will not be  
4. | determined on the basis of compliance or non compliance with  
these rules except in compelling cir circumstances where  
justice demands, subject to the restrictions in rule  
18.8(b)...

5. | (c) Waiver. The appellate court may waive or alter the  
6. | provisions of any of these rule in order to serve the ends  
7. | of justice, subject to the restrictions in rule 18.8(b) and  
8. | (c)."

9. | See also e.g., *Espinoza-Matthews v California*, 432 U.S 1021 (9th  
10. | Cir 2005)(Equitable tolling applies when a Dept. of Corrections  
11. | interferes with an inmates right of access to, or presentation  
12. | of evidence to the courts.). See Also e.g., *Banks v Dretke* 540 US  
13. | 668, 671-73, 124 Sct 1256, 1260-62, 157 LEd2d 1166 (2004)(Due  
14. | Process is violated and conviction to be reversed when any agent  
15. | of the state withholds impeachment evidence, not just the  
16. | prosecutor).

17. | See also e.g., *Giles v California* 554 US 353, 128 Sct 2678, 172  
18. | LEd2d 488 (2008)(discussing a variety of applications of the  
19. | Common Law Doctrine of Forfeiture By Wrongdoing. Which was well-  
20. | established at the Country's founding, applying to the states  
21. | through the Fourteenth Amendment and can be summed up as not  
22. | allowing a wrongdoer to benefit from attempts to thwart the law  
23. | or benefit from unlawful behavior.). Washington State also  
24. | acknowledges common law under RCW 4.04.010.

1. | A. WASHINGTON'S PUBLIC RECORDS ACT

2. |  
3. | The purpose of the PRA is "to provide full access to  
4. | nonexempt public records." Am. Civil Liberties Union of Wash. v  
5. | Blaine Sch. Dist. No. 503 (ACLU I), 86 Wn.App 688, 695, 937 P.2d  
6. | 1176 (1997). "Access is the underlying theme of the Act." Id. at  
7. | 696. The Act is "a strongly worded mandate for broad disclosure  
8. | of public records." Hurst Corp. v Hoppe, 90 Wn2d 123, 127, 580  
9. | P.3d 246 (1978). "The purpose of the [PRA] is to keep public  
10. | officials and institutions accountable to the people." Daines v  
11. | Spokane County, 111 WnApp 342, 347, 44 P.3d 909 (2002).

12. |  
13. | Washington courts "interpret the [ACT] liberally to promote  
14. | full disclosure of government activity that the people might know  
15. | their representatives have executed the public trust placed in  
16. | them and so hold them accountable." Spokane Research & Def. Fund  
17. | v City of Spokane (Spokane Research IV), 155 Wn2d 89, 100, 117  
18. | P3d 1117 (2005).

19. |  
20. | Washington Courts refuse to enter into "hypertechnical"  
21. | interpretations of the Act, Vance v Offices of Thurston County  
22. | Comm'rs, 117 WnApp 660, 668, 71 P.3d 680 (2003), review denied,  
23. | 151 Wn2d 1013 (2004), or "erect technical barriers" to deny  
24. | review of PRA claims. Spokane Research IV, 155 Wn2d at 105.

25. |  
26. |

1. |           The PRA not only instructs courts that it must be  
2. | interpreted in favor of disclosure, but repeats these  
3. | instructions several times. "[T]he Legislature takes the trouble  
4. | to repeat three times that exemptions under the [PRA] should be  
5. | construed narrowly... The Legislature leaves no room for doubt  
6. | about its intent[.]" Progressive Animal Welfare Society v Univ.  
7. | of Wash. (PAWS II), 125 Wn2d 243, 260, 884 P.2d 592 (1994).

8. |  
9. |           "To fulfill the statutory purpose, courts are to liberally  
10. | construe the Act's disclosure provisions and narrowly construe its  
11. | exemptions.'" Concerned Ratepayers Ass'n v Pub Util Dist No.1,  
12. | 138 Wn2d 950, 957, 983 P.2d 635 (1999)(emphasis added); see also  
13. | Dawson v Daly, 120 Wn2d 782, 789, 845 P.2d 995 (1993)("Because  
14. | the act favors disclosure, the exemptions must be construed  
15. | narrowly."); Newman v King County, 133 Wn2d 565, 571, 941 P.2d  
16. | 712 (1997)(same); Rental Hous. Ass'n of Puget Sound v City of Des  
17. | Moines, 165 Wn2d 525, 535, 199 P.3d 393 (2009)(same).

18. |  
19. |                           B. STD. OF JUDICIAL REVIEW IN PRA ACTIONS

20. |  
21. |           The agency or party bears the burden of proof establishing  
22. | that a statute permits the record to be withheld, RCW  
23. | 42.56.550(1); see also Broulet v Cowles Publ'g Co., 114 Wn2d 788,  
24. | 794, 791 P.2d 426 (1990)("The agency must shoulder the burden of  
25. | proving that one of the act's narrow exemptions shields the  
26. |

1. | records it wishes to keep confidential."); see also *Bellevue John*  
2. | *Does 1-11 v Bellevue Sch. Dist.*, 164 Wn2d 199, 209, 189 P.3d 139  
3. | (2008); *Rental Hous. Assn. of Puget Sound v City of Des Moines*,  
4. | 165 Wn2d 525, 535, 199 P.3d 393 (2009).

5. |  
6. |         Arguably, the agency's burden of proof extends beyond why a  
7. | record is exempt; the agency also bears the burden of proving  
8. | that it did not violate the PRA. See *Yacobellis v City of*  
9. | *Bellingham (Yacobellis I)*, 55 WnApp 706, 711, 780 P.2d 272  
10. | (1989), review denied, 114 Wn2d 1002 (1990)(holding that when  
11. | agency did not claim exemption from disclosure but rather "lost"  
12. | requested record, "The burden of proof is on the agency to  
13. | justify it's failure to disclose").

14. |  
15. |         Because "leaving interpretation of the ACT to those at whom  
16. | it was aimed would be the most direct course of devitalization,"  
17. | courts will not defer to the agency's determination of whether  
18. | the record is exempt or the agency provided timely response.  
19. | *Hearst Corp. v Hoppe*, 90 Wn2d 123, 131, 580 P.2d 246 (1978).  
20. | Instead, courts conduct, denovo review of the agency's action,  
21. | RCW 42.56.550(3). In this review, the PRA directs courts to "take  
22. | into account the policy of this chapter that free and open  
23. | examination of public records is in the public interest, even  
24. | though such examination may cause inconvenience or embarrassment  
25. | to public officials or others." *Id.* Appellate court review of the

26. |

1. | trial court decision is also de novo if the record consists  
2. | solely of documentary evidence. See Dawson v Daly, 120 Wn2d 782,  
3. | 788, 845 P.2d 995 (1993).

4. |  
5. | C. SILENT WITHHOLDING OF PUBLIC RECORDS  
6. |

7. | Under the Public Records Act, an agency must disclose all  
8. | public records upon request, unless the record falls under a  
9. | statutory exemption. RCW 42.56.070(1); Progressive Animal Welfare  
10. | Society v Univ. of Wash. (PAWS I), 114 Wn2d 677, 682-83, 790 P.2d  
11. | 604 (1990); Hearst Corp. v Hoppe, 90 Wn2d 123, 127-28, 560 P.2d  
12. | 246 (1978). If any record is withheld, the agency must identify  
13. | all withheld records to the requestor and provide an explanation  
14. | of how the record is exempt. Id.; RCW 42.56.210(3).

15. |  
16. | Failure to identify withheld records is a "silent  
17. | withholding" which is "clearly and emphatically prohibit[ed]" by  
18. | the PRA and "gives requestors the misleading impression that all  
19. | documents relevant to the request have been disclosed."  
20. | Progressive Animal Welfare Society v Univ. of Wash. (PAWS II),  
21. | 125 Wn2d 243, 270, 884 P.2d 592 (1994); see also Sanders v State,  
22. | 169 Wn2d 827, 832-36, 240 P.3d 120 (2010). "[A]n applicant need  
23. | not exhaust his or her own ingenuity to 'ferret out' records  
24. | through some combination of 'intuition and dilligent research.'"  
25. | Daines v Spokane County 111 WnApp 342, 349, 44 P.3d 909 (2002).

1. | 4. AS APPLIED TO THE CASE AT HAND

2. |

3. | While the WDOC properly claimed limited exception under RCW  
4. | 9.73.095 it's subsequent actions demonstrate a pattern of bad  
5. | faith by WDOC and shows an intent to not comply with the PRA.

6. | These include:

7. |

8. | 1. Ignoring a Order to Compel disclosure by the Snohomish County  
9. | Superior Court.

10. |

11. | 2. Making false claims that the requested records no longer  
12. | existed to avoid having to comply with Snohomish County's Order  
13. | to Compel them.

14. |

15. | 3. By forcing Mr Garvie to make multiple attempts to obtain the  
16. | records which should have been released to him once the Snohomish  
17. | County Superior Court issued the Order to Compel.

18. |

19. | 4. By taking Mr Garvie's legal documents from him and then  
20. | "losing" those that pertained to his PRA requests impeding his  
21. | ability to pursue his Public Records Request.

22. |

23. | 5. By not producing the requested records until producing them on  
24. | April 13, 2013 in response to when Kenneth Kato, attorney at law  
25. | filed a Subpoena Duces Tecum for the records.

26. |

1. | The Thurston County Superior Court erred and abused its  
2. | discretion making errors of law, fact and coming to conclusion  
3. | and adopted a view no reasonable person would take; coming to  
4. | decisions outside the range of acceptable choices.

5. |

6. | 1. The Court made a balkanized analysis of Mr Garvie's four PRA  
7. | request rather than dealing with them as one on-going request for  
8. | timeliness and other legal purposes.

9. |

10. | 2. By ruling on three of the PRA requests to find for summary  
11. | judgement on behalf of the WDOC while ignoring the fourth  
12. | completely.

13. |

14. | 3. By ignoring the WDOC's bad faith actions which were on-going  
15. | in nature and violated the PRA as well as a court order requiring  
16. | them to release a copy of the records.

17. |

18. | 4. By ignoring the WDOC's behavior and finding for Summary  
19. | Judgement on behalf of the WDOC.

20. |

21. |

22. |

23. |

24. |

25. |

26. |

V. CONCLUSION

1. |  
2. |  
3. | 1. the WDOC violated the PRA.

4. |  
5. | 2. The WDOC acted in Bad-Faith.

6. |  
7. | 3. The PRA requests were in actuality one continuous and ongoing  
8. | request for disclosure of public records.

9. |  
10. | 4. The Thurston County Superior Court abused it's discretion in  
11. | finding for summary judgement on behalf of the WDOC.

12. |  
13. | 5. This Court should reverse the Thurston County Superior Court's  
14. | Order for summary judgement and remand back with directions.

15. |  
16. | VI. OATH

17. |  
18. | I, Eugen Garvie do hereby declare, under penalty of perjury under  
19. | the laws of the State of Washington the the foregoing is true and  
20. | correct.

21. | Dated this 29th day of December, 2013 at the Stafford Creek  
22. | Corrections Center, Aberdeen, WA.

23. |   
24. | \_\_\_\_\_

25. | Eugene Garvie DOC# 307014  
26. | Stafford Creek Corrections Center  
191 Constantine Way, H3A9L  
Aberdeen, WA. 98520

DECLARATION OF SERVICE BY MAIL  
GR 3.1

I, Mr. Eugene Garvie, declare and says:

That on the 30 day of December, 2013, I deposited the following documents in the Stafford Creek Correctional Centers Legal Mail System by First Class Mail Pre-Paid, under Case Cause NO. 45329-1-II;

ADDRESS TO THE FOLLOWING:

Cassie vanRoojen, WSBA#44049.  
Assistant Attorney General  
Criminal Justice Division  
P.O. BOX 40116  
Olympia, WA 98504-0116

David Ponzoha, Clerk  
Court of Appeals, Division II  
950 Broadway, Suite 300  
MS TB-06  
Tacoma, WA 98402-4427

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COURT OF APPEALS  
DIVISION II  
2014 JAN -2 PM 2:07  
STATE OF WASHINGTON  
BY  
DEFINER

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

RCW § 9A.72.085.

DATED THIS 30, day of December, 2013, in the City of Aberdeen, County of Grays Harbor, State of Washington, 98520.

  
\_\_\_\_\_  
Signature

Mr. Eugene Garvie  
Print Name  
DOC#307014, UNIT H3-A09.  
STAFFORD CREEK CORRECTIONAL CENTER  
191 CONSTANTINE WAY  
ABERDEEN, WA 98520