

NO. 47163-9

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

STATE OF WASHINGTON, RESPONDENT

v.

BONNIE MARIE TEAFATILLER, APPELLANT

Appeal from the Superior Court of Pierce County
The Honorable Judge Bryan Chuschcoff

No. 13-1-03251-3

BRIEF OF RESPONDENT

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A. ISSUES PERTAINING TO APPELLANT'S ASSIGNMENTS OF ERROR.

1. Where there is a strong presumption that a trial court conducting a bench trial applied the proper law, and the conclusions of law and written opinion in this case repeatedly state the beyond a reasonable doubt burden, did the trial court apply the proper burden of proof?
2. Has defendant waived challenge to her discretionary legal financial obligations on appeal by failing to object at sentencing? Further, where defendant has failed to show the result of her sentencing would have been different if counsel had objected, does her ineffective assistance of counsel claim fail?

B. STATEMENT OF THE CASE.

1. Procedure

The Pierce County Prosecuting Attorney's Office charged Bonnie Teafatiller (hereinafter "defendant") by amended information with first degree attempted murder (count one), first degree assault (count two), second degree assault (count three), two counts of first degree attempted robbery (counts four and five), second degree promoting prostitution (count six), second degree unlawful possession of a firearm (count seven), and conspiracy to commit first degree robbery (count eight). CP 191-95;

RCW 9A.32.030(1)(a), 9A.28.020; RCW 9A.36.011(1)(a); RCW 9A.36.021(1)(c); RCW 9A.56.190, 9A.56.200(1)(a)(i), 9A.28.020; RCW 9A.88.080(1)(a)(b); RCW 9.41.040(2)(a); RCW 9A.56.190.

Defendant successfully moved to sever her trial from her co-defendant, Steven Kelly. *See* CP 171–89. Following a CrR 3.5 hearing, the court found statements defendant made to police admissible. (10/03/14)RP 47.¹ Defendant moved to waive her right to a jury trial. CP 293-294. The court granted the motion, thereby allowing the case to proceed as a bench trial. *See* (11/24/14)RP 6.

After the State rested its case-in-chief, it moved to dismiss the first degree conspiracy to commit robbery charge (count 8). 7RP 415. The court granted the motion and dismissed count 8. The defendant called one witness. *See* 8RP 422–511.

The court found defendant guilty of the lesser included attempted second degree murder for count one, including that she was armed with a firearm. CP 345–46. The court further found defendant guilty of counts two, three, four, five, and seven. CP 346–47. The court found defendant not guilty of count six. CP 347. The court issued a written decision and findings of fact and conclusions of law. CP 341–73.

¹ The pre-trial verbatim report of proceedings will be referred to by date, RP, and page number, (##/##/##)RP #. The verbatim report of proceedings for trial and sentencing will be referred to by volume, RP, and page number, #RP #.

The court sentenced defendant to a total of 302.25 months: a sentence of 146.25 on count one, to be run consecutively to the firearm enhancements on counts one, three, and four (60, 60, and 36 months respectively). CP 382. The court further ordered \$2,800 in legal financial obligations: \$800 of mandatory court fees and \$2,000 discretionary department of assigned counsel recoupment. CP 381.

Defendant filed timely notice of appeal. CP 324–36.

2. Facts

On August 16, 2013, Allen Jenkins was with his nephew, Bruce Marbley, at the Biltmore Motel in Tacoma. 5RP 112; CP 342. The two men were standing outside of their motel room, discussing their plans to go to a strip club in Seattle when defendant approached them. 5RP 116, 119; 192–93. Defendant had overheard the two men and offered to get them “all of the girls” they wanted. 5RP 120; CP 342. Defendant got on her phone and Kayla Wadley showed up. 5RP 121; *see also* 7RP 360. According to Wadley, she was already at the Biltmore with her cousin, Steven Kelly, when defendant told Wadley she had men looking to spend some money. 7RP 362–63.

Jenkins, Marbley, Wadley, and defendant all got into Marbley’s SUV. 5RP 127–28; CP 342. Jenkins drove, Wadley sat behind Jenkins, Marbley sat in the front passenger seat, and defendant sat behind Marbley. 5RP 127; 194; 7RP 368; CP 342. Defendant directed Jenkins to an

apartment complex, 5RP 129, where she said she could get more women. 5RP 131. But Jenkins and Marbley were unhappy with the woman who eventually showed up. 5RP 131. They told defendant she would have to “do better than this.” 5RP 133.

According to Wadley, the group then went to a little corner store. 7RP 374. While there, Jenkins and defendant argued about the price that the two had previously set for their arrangement. 7RP 374. All four got back into the SUV. 7RP 377. As Jenkins drove, defendant demanded that he take them to an ATM to get the money he owed. 7RP 377–78. Jenkins said he would give her \$100 but that was it. 7RP 378. Then Wadley heard the gunshot. 7RP 378.

According to Jenkins, the four got back into Marbley’s SUV after the apartment complex, but defendant kept directing Jenkins to drive to dead-end roads. 5RP 133. Frustrated, Jenkins had enough and asked defendant to direct them back to the motel. 5RP 133. Then defendant reached into her purse and pulled out a firearm, pointed it at Jenkins, and demanded Marbley’s billfold. 5RP 135; *see* CP 343. Defendant ordered the men to put their hands up. 7RP 380; *see* CP 343. Instead, Jenkins stepped on the accelerator, telling defendant that if she shot him, they would all die. 5RP 136. Jenkins drove quickly for three blocks, with defendant still pointing the gun at him, until he had to stop at a busy intersection. 5RP 140, 137.

When Jenkins stopped at the intersection, defendant fired her gun. 5RP 142. Wadley recalled three shots. 7RP 381.² The first, defendant shot out her window. 7RP 381. The second, defendant shot into the front dashboard. 7RP 382. In response to that shot, Jenkins turned, and defendant fired her third shot into his neck. 5RP 143–44; 7RP 384. According to defense expert Kay Sweeney, the muzzle was only one inch from Jenkins’s skin. 8RP 466; CP 343. The bullet went in underneath Jenkins’s ear, straight through his neck, and came out underneath his other ear. 5RP 144.

Jenkins grabbed a rag to try and stop the bleeding. 5RP 147. Wadley and defendant exited the SUV and ran. 5RP 147; 7RP 386. Marbley was screaming and panicking. 5RP 148. Jenkins, still holding the rag to his bullet wound, drove to a nearby gas station and told Marbley to call an ambulance. 5RP 147. Paramedics arrived and took Jenkins to the hospital. 5RP 149. Jenkins described defendant as the shooter to police both at the gas station and later in the hospital. *See* 5RP 230, 232; 240.

The Lakewood Police Department processed Marbley’s SUV. *See* 6RP 265. Officer Bryan Johnson found one spent cartridge casing in the vehicle in the area between the center console and the front passenger seat. 6RP 269. He also found two unfired rounds—one on the rear passenger side floorboard and the other slightly under the front passenger seat. 5RP

² The trial court ultimately found that defendant fired “at least two shots.” CP 343.

271. Officer Johnson also found a fired bullet in the front dashboard near the windshield. 6RP 247.

Officer Sean Conlon prepared a photo montage for this case. 7RP 406. Jenkins immediately picked defendant out of the montage as the person who shot him. 5RP 149; 7RP 410. Marbley also picked defendant out of the montage. 7RP 411. Wadley also identified defendant from the montage. 7RP 413.

Officer Jeff Martin spoke to defendant on the phone on August 18. 6RP 324. Initially, defendant told Officer Martin she could not have been involved in the incident because she was in Auburn that entire day. 6RP 324. After Officer Martin urged her to be honest, her story changed. 6RP 324. Defendant said she had brokered a prostitution deal for “an old guy and his nephew.” 6RP 325. She said she rode with them in a vehicle, and she sat in the rear seat on the passenger side. 6RP 325. After going to the Crosslands Motel, where the “older gentleman” turned down a prostitute she attempted to provide, defendant said she got into a different vehicle. 6RP 326. Defendant agreed to meet Officer Martin for an interview later that evening. 6RP 327–28. That interview was recorded. 6RP 331.³

³ A CD and transcript of the interview were admitted at the bench trial. 7RP 337; ex. 21. The trial court watched the video and followed along with the transcript. 7RP 403–04, 414.

C. ARGUMENT.

1. THE TRIAL COURT'S CONCLUSIONS OF LAW AND WRITTEN OPINION SHOW IT APPLIED THE PROPER BEYOND A REASONABLE DOUBT BURDEN OF PROOF.

The State bears the burden of proving all elements of an offense beyond a reasonable doubt. *In re Winship*, 397 U.S. 358, 364, 90 S. Ct. 1068, 25 L. Ed. 2d 368 (1970). A judge conducting a bench trial is presumed to know and apply the law, including the correct burden of proof. See *State v. Adams*, 91 Wn.2d 86, 93, 586 P.2d 1168 (1978). In this case, the State emphasized that the burden of proof was beyond a reasonable doubt in closing arguments. 9RP 521, 528. Defense counsel also emphasized this burden in his closing argument. 9RP 534, 541, 555, 559, 567, 568, 569, 571. When looking at the findings of fact and conclusions of law, as well as the accompanying written decision of the court, it is clear the trial court applied the proper “beyond a reasonable doubt” standard.

In the conclusions of law, the court memorialized its findings that the State either had “proved beyond a reasonable doubt” or had “not proved beyond a reasonable doubt” defendant’s guilt for each count charged. CP 345–47. The court also stated that the conclusions of fact, together with the facts in the court’s written decision, “were proved beyond a reasonable doubt.” CP 345. Further, in the written decision, the trial court referred to the beyond a reasonable doubt burden several times.

See CP 362, 363, 368, 369, 370. For example, the court wrote: “The court finds, *beyond a reasonable doubt*, that [defendant] attempted the robbery of both men and that she shot Mr. Jenkins on the night of August 16, 2013.” CP 362 (emphasis added). And, as another example, the court wrote, “There is a *reasonable doubt* the defendant knowingly profited or tried to profit from prostitution as charged in Count VI.” CP 369 (emphasis added).

The statements defendant now assigns error to are examples of the court, as the trier of fact, weighing the evidence. See Br. of App. p. 17; CP 361–62. The statements are followed by the court finding the elements of the crime were proved beyond a reasonable doubt. CP 362. As the trier of fact in this case, the court had to weigh the evidence and assess the credibility of the testimony presented by both the State and defendant⁴ to determine if the State had proven the elements of each offense beyond a reasonable doubt. This written deliberation shows nothing more than that the court actively weighed the evidence before determining guilt (and not guilt) beyond a reasonable doubt. There is a strong presumption that a court applied the correct law, and defendant has not overcome this

⁴ Defendant argues that the court’s comments that the defense evidence did not “supply a reasonable doubt” were it “faulting” the defendant for failing to supply a reasonable doubt. Br. of App. p. 18; CP 362. But when a defendant puts on evidence, the trier of fact can assess the credibility of that evidence. Taken in context, the court’s statement is simply it deliberating on the defense evidence presented and concluding that it still found the State had proved the charge beyond a reasonable doubt despite defendant’s evidence. See CP 362.

presumption, particularly when the court explicitly stated it was applying the beyond a reasonable doubt burden throughout the conclusions of law and written opinion.

2. DEFENDANT HAS WAIVED HER CHALLENGE TO LEGAL FINANCIAL OBLIGATIONS BY FAILING TO OBJECT AT SENTENCING. FURTHER, DEFENDANT CANNOT SHOW INEFFECTIVE ASSISTANCE OF COUNSEL BECAUSE SHE HAS NOT SHOWN THE REQUISITE PREJUDICE BASED ON THE RECORD.
 - a. Defendant has waived this issue for appeal because she failed to object to the discretionary legal financial obligations at sentencing.

Failure to object precludes raising an issue on appeal. *State v. Guloy*, 104 Wn.2d 412, 421, 705 P.2d 1182 (1985). A defendant may only appeal a non-constitutional issue on the same grounds that he objected on below. *State v. Thetford*, 109 Wn.2d 392, 397, 745 P.2d 496 (1987); *State v. Hettich*, 70 Wn. App. 586, 592, 854 P.2d 1112 (1993). Objecting to an issue promotes judicial efficiency by giving the trial court an opportunity to fix any potential errors, thereby avoiding unnecessary appeals. *See State v. Lindsey*, 177 Wn. App. 233, 247, 311 P.3d 61 (2013).

Defendant had an opportunity to object to the discretionary legal financial obligations (LFOs) imposed and provide the trial court with any information of her circumstances that would make payment inappropriate during her sentencing hearing. *See* 10RP 600–30. Defendant failed to

make any objection to the costs imposed during the hearing. *See* 10RP 600–30. Defendant failed to properly preserve the issue at the trial level.

The appellate court may grant discretionary review for three issues raised for the first time on appeal: (1) lack of trial court jurisdiction, (2) failure to establish facts upon which relief can be granted, and (3) manifest error affecting a constitutional right. RAP 2.5(a). *See also State v. Riley*, 121 Wn.2d 22, 31, 846 P.2d 1365 (1993); *State v. Sisouvanh*, 175 Wn.2d 607, 618, 290 P.3d 942 (2012). To fall under the exceptions provided in RAP 2.5(a), defendant would need to claim there was a manifest error—requiring actual prejudice—affecting a constitutional right. *See State v. Lynn*, 67 Wn. App. 339, 345, 835 P.2d 251 (1992); *State v. Gordon*, 172 Wn. 2d 671, 676, 260 P.3d 884 (2011). Only if a defendant proves an error that is both constitutional and manifest does the burden shift to the State to show harmless error. *State v. McFarland*, 127 Wn.2d 322, 333, 899 P.2d 1251 (1995). Defendant has failed to provide any evidence of prejudice required for a manifest constitutional error, so this court should decline to exercise its discretionary RAP 2.5(a) review.

Defendant relies on *State v. Blazina* to support the proposition that this court should exercise its powers under RAP 2.5(a) and reach the merits of the case despite the failure to preserve the issue below. 182 Wn.2d 827, 344 P.3d 680 (2015); Br. of App. p. 19–25. Although the Supreme Court did exercise its RAP 2.5(a) discretion to reach the merits in that case, the Court specifically held that “the Court of Appeals did not

err in declining to reach the merits.” *Blazina*, 182 Wn.2d at 830. The Court further stated, “Each appellate court must make its own decision to accept discretionary review. National and local cries for reform of broken LFO systems demand that *this* court exercise its RAP 2.5(a) discretion and reach the merits of this case.” *Id.* at 835 (emphasis added). As this state’s highest court, the Supreme Court is in a unique position which necessitated that it address the LFO concerns. The Court made it clear that other appellate courts are not obligated to exercise their discretion in the same way.

Relying on this statement by the Court, Division II has declined to exercise its discretion to review LFO challenges raised for the first time on appeal. *State v. Lyle*, 188 Wn. App. 848, 851–52, 355 P.3d 327 (2015). Emphasizing that the defendant’s sentencing occurred after Division II’s decision in *Blazina*—where the court declined to exercise its discretion—the court stated that the defendant was on notice that failing to object would waive the issue for appeal. *Id.* In this case, defendant’s sentencing was held on January 23, 2014. *See* 10RP 597. This was after Division II’s decision in *State v. Blazina*, 174 Wn. App. 906, 301 P.3d 492 (2013). Therefore, defendant was on notice that failing to object to the LFOs would waive the issue for appeal. This court should decline to exercise such discretion where defendant has failed to present an argument for why, in this specific case, justice demands this court exercise its power of discretionary review under RAP 2.5(a).

- b. Defendant has not shown that defense counsel was ineffective; although counsel's representation was arguably deficient, defendant cannot show prejudice based on the record developed in the trial court.

To demonstrate ineffective assistance of counsel, a defendant must show two things: (1) defense counsel's representation fell below an objective standard of reasonableness in light of all circumstances, and (2) defense counsel's representation prejudiced the defendant. *State v. McFarland*, 127 Wn.2d 322, 334–35, 899 P.2d 1251 (1995); *State v. Thomas*, 109 Wn.2d 222, 225–26, 743 P.2d 816 (1987) (applying the two-prong test in *Strickland v. Washington*, 466 U.S. 668, 687, 104 S. Ct. 2052, 80 L. Ed. 2d 674 (1984)). To show prejudice, defendant must show that, except for counsel's alleged errors, the result of the proceeding would have been different. *McFarland*, 127 Wn. 2d at 335.

The burden is on the defendant alleging ineffective assistance to show deficient representation based on the record below. *Id.* There is a strong presumption that counsel's representation was effective. *Id.*; *State v. Brett*, 162 Wn.2d 136, 198, 892 P.2d 29 (1995). The failure of a defendant to show either deficient performance or prejudice defeats his claim. *State v. Emery*, 174 Wn.2d 741, 755, 278 P.3d 653 (2012).

As mentioned above, defendant's sentencing hearing occurred after Division II's decision in *Blazina*. Therefore, defense counsel should have known that he needed to object to preserve the issue. *See Lyle*, 188 Wn.

App. at 853. Defendant has arguably shown deficient performance.

Defendant has not, however, shown on this record that counsel's deficient performance prejudiced her. To show prejudice, defendant must establish, "based on the record developed in the trial court, that the result of the proceeding would have been different but for counsel's deficient representation." *Id.* (quoting *McFarland*, 127 Wn.2d at 337). Because there is limited evidence on the record regarding defendant's ability to pay,⁵ the record is insufficient to determine if the trial court would have imposed different LFOs if defense counsel had objected.

In *Lyle*, Division II addressed a similar challenge to the effectiveness of counsel regarding LFOs. In finding the defendant had not shown prejudice, the court stated:

[T]here are no additional facts in the record, such as whether Lyle has additional debt, which would allow us to determine whether the trial court would have imposed fewer or no LFOs if defense counsel had objected. Because Lyle must establish prejudice on this record and the record is not sufficient for us to determine whether there is a reasonable probability that the trial court's decision would have been different, his ineffective assistance of counsel claim fails.

Lyle, 188 Wn. App. at 853–54. In the present case, the record is similarly deficient. Without more information on the record about defendant's ability to pay, the record is insufficient to say that the proceeding would

⁵ It should be noted that over the course of the trial, there was evidence that defendant was physically able (for example, defendant ran from the SUV after shooting Jenkins, 5RP 147; 7RP 386) and engaged in activities meant to earn money (for example, brokering the deal with Jenkins and Marbley for female companionship, 5RP 120; CP 342). Therefore, the record is not void of evidence suggesting defendant's ability to pay.

have been different if defense counsel would have objected to the discretionary LFOs. Therefore, defendant's claim of ineffective assistance of counsel fails.

D. CONCLUSION.

The conclusions of law and written opinion of the court show that the trial court applied the beyond a reasonable doubt burden of proof; therefore it did not apply an unconstitutionally low burden of proof. Further, defendant has waived challenge to her legal financial obligations by failing to object at her pre-*Blazina* sentencing, and her ineffective assistance of counsel claim fails because she has not shown prejudice.

Therefore, the State respectfully requests that this court affirm defendant's convictions and legal financial obligations.

DATED: APRIL 1, 2016

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Rule 9

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