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

STATE OF WASHINGTON, RESPONDENT

v.

M.A.G., APPELLANT

Appeal from the Superior Court of Pierce County
The Honorable John R. Hickman

No. 16-8-00030-1

Brief of Respondent

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

1. Did the trial court properly admit the child hearsay statements after finding that each of the *Ryan* factors were satisfied?
2. Did respondent have a right to a jury trial in a juvenile proceeding when case law has consistently held that given the juvenile system's focus on rehabilitation versus punishment, juvenile respondents do not have a right to a jury trial?

B. STATEMENT OF THE CASE.

1. Procedure

On January 15, 2016, the State charged M.A.G., hereinafter referred to as the "respondent", with one count of Attempted Rape of a Child in the First Degree. CP 1. On September 6, 2016, the State filed an Amended Information adding one count (count II) of Child Molestation in the First Degree. CP 26-27.

Trial began on September 6, 2016. RP 17¹. Bench trial was held before the Honorable Judge John R. Hickman. RP 17. Prior to trial, the

¹ The Verbatim Report of Proceedings are contained in 6 files with 5 trial volumes. All trial volumes have consecutive pagination. All other files are labeled by date.

State filed a brief regarding the admissibility of child hearsay encompassing the *Ryan* factors in anticipation of K.E., the minor victim's testimony. RP 5. The court reserved ruling on the issue of child hearsay. RP 5-6. Following K.E.'s testimony, the court found that K.E.'s testimony was admissible and entered an Order on Admissibility of Child Hearsay. 3RP 258, CP 35-36.

On September 19, 2016, the trial court found the respondent guilty beyond a reasonable doubt of one count of Attempted Rape of a Child in the First Degree and one count of Child Molestation in the First degree. 4RP 324. On October 17, 2016, the respondent was committed within the standard range to the Department of Social and Health Services, Division of Juvenile Rehabilitation for institutional placement for 15-26 weeks on count I and 30-40 weeks on count II, consecutive to count I and given 21 days credit. CP 49-58.

In April 2017, court appointed counsel filed a brief pursuant to *Anders v. California*, 386 U.S. 738, 87 S. Ct. 1396, 18 L. Ed. 2d 493 (1967) asserting there were no nonfrivolous issues and asking to withdraw as counsel. Shortly after filing the Anders brief, appointed counsel took a position as a deputy prosecuting attorney. Respondent filed a motion to reconsider which this Court granted. Respondent was appointed new counsel and timely filed another notice of appeal. CP 61.

2. Facts

In August of 2015, 8 year old K.E.² spent the weekend at her aunt Jonda Smith's home in Silverdale, WA. RP 60. K.E. typically slept over at Ms. Smith's home during their monthly family dinners. RP 75-76, 127. The respondent lived with his grandmother, Ms. Smith at that residence. RP 76-77. The residence was a converted one room garage with a cement floor and pellet stove. RP 77. That weekend, the respondent, K.E.'s first cousin, took K.E. inside a tent out by the garage and attempted to rape her. RP 33-34, 81-82. The respondent pulled both his and K.E.'s pants and underwear down and held her down as he put his penis on her vagina and butt and repeatedly tried to rape her. RP 33-34, 81-82. Although the respondent couldn't get his penis in K.E.'s vagina because it was "too big", he touched her vagina with his hands, finger, and penis. RP 37, 81-82. K.E. tried to get away, but the respondent pulled her back toward him. RP 38, 81-82. The respondent stopped as soon as he heard Ms. Smith come out, quickly pulled his pants up and told K.E. to do the same. RP 39-40. Ms. Smith heard an elastic snap and the respondent say "there". RP 40, 134. She saw the respondent about six inches from K.E. with her

² Because the victim was a minor at the time of the incident, the State is referring to her by her initials and no disrespect is intended.

back towards him. RP 134. The respondent and K.E. were both fixing their clothes. RP 152.

Ms. Smith reprimanded the respondent for being alone with K.E. RP 136. She told him he should know better than to be alone with K.E. RP 136. K.E. was not allowed to be alone with men because she was molested before. RP 136. Molestation runs in K.E.'s family. RP 149-150. Ms. Smith and her mother, Tonya Martinez-Eberhart were both molested. RP 141, 149-150.

That night, K.E. put herself to bed without telling Ms. Smith what happened because she knew Ms. Smith wouldn't believe her. RP 41, 138. The next day after she'd gone home, K.E. told her mother that the respondent tried to rape her. RP 46.

C. ARGUMENT.

1. THE TRIAL COURT PROPERLY ADMITTED CHILD HEARSAY STATEMENTS AFTER FINDING THAT EACH OF THE **RYAN** FACTORS WERE SATISFIED.

The admission or exclusion of relevant evidence is within the discretion of the trial court. *State v. Swan*, 114 Wn.2d 613, 658, 700 P.2d 610 (1990); *State v. Rehak*, 67 Wn. App. 157, 162, *review denied*, 120 Wn.2d 1022 (1992). The trial court's decision will not be reversed on appeal absent an abuse of discretion, which exists only when no

reasonable person would have taken the position adopted by the trial court.

Rehak, 67 Wn. App. at 162.

RCW 9A.44.120, commonly referred to as the “child hearsay statute,” provides for the admission of out-of-court statements of a child victim of sexual abuse under certain circumstances. Essentially, the child hearsay statute requires a trial court to answer three questions in making its determination of the admissibility of child hearsay statements: (1) is the child victim’s statement reliable; (2) is the child available to testify; and (3) if the child is unavailable, is there corroborative evidence of the act.

The child hearsay statute requires the court to hold a pre-trial hearing in which it determines the admissibility of a child victim’s statements. During that hearing, the court must first determine if the statement being offered is reliable. That determination is based on a set of reliability factors approved by the Washington Supreme Court in *State v.*

Ryan, 103 Wn.2d 165, 175-76, 691 P.2d 197 (1984):

1. Whether the child has an apparent motive to lie;
2. The general character of the declarant, including veracity;
3. Whether more than one person heard the statements;
4. Whether the statements were made spontaneously;
5. Timing of declaration and relationship between declarant and witness;

6. Whether the statement contains express assertions about past facts;
7. Whether cross-examination could show the declarant's lack of knowledge;
8. Is there only a remote possibility the declarant's recollection is faulty; and
9. The overall circumstances surrounding the statement.

Ryan, 103 Wn.2d at 175-76 (taking the first five of those factors from *State v. Parris*, 98 Wn.2d 140, 654 P.2d 77 (1982), and the last four from *Dutton v. Evans*, 400 U.S. 74, 91 S. Ct. 210, 27 L. Ed. 2d 213 (1970)).

In the years since the *Ryan* case was decided, two of the factors have been eliminated from consideration in the context of child hearsay. Factor six about assertions of past facts does not apply to child hearsay statements because every statement a child makes concerning sexual abuse will be a statement relating a past fact. See *State v. Leavitt*, 111 Wn.2d 66, 75, 758 P.2d 982 (1988); *State v. Stange*, 53 Wn. App. 638, 769 P.2d 873, review denied, 113 Wn.2d 1007 (1989). Factor seven concerning cross-examination also does not apply to child hearsay statements because “cross-examination could in every case possibly show error in the child hearsay statement.” *Stange*, 53 Wn. App. at 647. See also *Idaho v. Wright*, 497 U.S. 805, 820-824, 110 S. Ct. 3139, 111 L. Ed. 2d 638 (1990).

Not every *Ryan* factor must be met before a statement is reliable. “[I]t is clear that not every factor listed in *Ryan* needs to be satisfied before a court will find a child’s hearsay statement reliable under the child victim hearsay statute.” See *Swan, supra* at 652. Hence, there is no “magic number” of the remaining seven factors that must be present before the court finds the child’s statements are reliable. The court must only find the factors have been “substantially met.” See, e.g., *State v. McKinney*, 50 Wn. App. 56, 61-62, 747 P.2d 1113 (1987).

Here, the trial court made a complete finding regarding the admissibility of the child hearsay statements after hearing arguments from both sides. The trial court went through each of the *Ryan* factors and found that each of them was substantially met. RP 222-229, 258, CP 35-36. The trial court ruled that the victim’s statements to her mother and to the forensic interviewer were admissible. RP 132, CP 20-22.

Respondent claims that the trial court abused its discretion in admitting K.E.’s statements because her statements weren’t “spontaneous” as they were made in response to questioning by her mother. Brief of Appellant at 7. This claim fails because statements even when made in response to questions about sexual abuse are spontaneous so long as questions are not leading or suggestive. *State v. Young*, 62 Wn. App. 895, 901, 802 P.2d 829 (1991). Here, K.E. was acting unusually sullen before

having to go back to Ms. Smith's home where she was molested. RP 77. Her mother knew something was wrong and asked if she'd been touched inappropriately, but allowed K.E. to respond in her own words. RP 80-82. The statements were made by K.E. not K.E.'s mother. Thus, the court did not abuse its discretion in admitting the child hearsay statements as the *Ryan* factors were substantially met.

2. AS JUVENILE A RESPONDENT, M.A.G. DID NOT HAVE A CONSTITUTIONAL RIGHT TO A JURY TRIAL PURSUANT TO *CHAVEZ* AND AS THE PURPOSES OF THE JUVENILE SYSTEM DIFFER FROM THE ADULT SYSTEM.

The constitutional right to a jury trial does not apply to juvenile respondents. The United States Supreme Court held, "trial by a jury in the juvenile court's adjudicative stage is not a constitutional requirement." *State v. J.H.*, 96 Wn. App. 167, 170, 978 P.2d 1121 (1999) (citing *McKeiver v. Pennsylvania*, 403 U.S. 528, 545, 91 S. Ct. 1976, 29 L. Ed. 2d 647 (1971)). The Washington State Supreme Court found that juveniles do not have a right to a jury trial under the Juvenile Justice Act. *State v. Lawley*, 91 Wn.2d 654, 655, 591 P.2d 772 (1979). The court has continually reaffirmed their position, as seen in *State v. Chavez*, 163 Wn.2d 262, 272, 180 P.3d 1250 (2008), where the court held that, "the juvenile justice system has not been so altered that juveniles charged with

violent and serious violent offenses have the right to a jury trial.” See also, *J.H.*, 96 Wn. App. 167; *State v. Hatfield*, 51 Wn. App. 408, 754 P.2d 136 (1988) (RCW 13.04.021(2) does not violate jury trial or equal protection provisions of state or federal constitutions); *State v. Schaaf*, 109 Wn.2d 1, 743 P.2d 240 (1987) (juvenile offenders not entitled to jury trials under State Constitution).

The courts have examined the focus on rehabilitation at the juvenile level as well as the lesser penalties in the juvenile system and have noted how these points differ from the adult criminal justice system. Current case law holds that juvenile offenders do not have a constitutional right to a jury trial.

- a. The juvenile justice system focuses on rehabilitation.

The purpose of the juvenile system is very different from the purpose of the adult system. The Juvenile Justice Act (JJA) declares the purpose of the juvenile system as follows:

It is the intent of the legislature that a system capable of having primary responsibility for, being accountable for, and responding to the needs of youthful offenders and their victims, as defined by this chapter, be established. It is the further intent of the legislature that youth, in turn, be held accountable for their offenses and that communities, families, and the juvenile courts carry out their functions consistent with this intent.

RCW 13.40.010(2). The JJA has been amended since its inception, but the courts have continued to find that the focus remains on rehabilitation and is distinguishable from the adult system. *Schaaf*, 109 Wn.2d at 4; *J.H.*, 96 Wn. App. at 182; *Chavez*, 163 Wn.2d at 272. “We first note that the legislature’s statement of intent and purpose changed with enactment of the 1997 amendments only insofar as it increased the emphasis on responding to the needs of juvenile offenders.” *J.H.*, 96 Wn. App. at 172.

This statement of purpose is different than the purpose of the Sentencing Reform Act (SRA) which governs the adult criminal system. Rather than focusing on responding to the needs of the offenders, the adult system focuses on punishment of the offenders. *J.H.*, 96 Wn. App. at 173; *Schaaf*, 109 Wn.2d at 10. Only one of the purposes of the SRA appears to address the possibility of treatment, and it is fifth on the list of seven purposes, seemingly not a priority. RCW 9.94A.010. In contrast, one of the purposes of the JJA is to hold the offenders accountable. *J.H.*, 96 Wn. App. at 173. With rehabilitation as the focus of the JJA and only a small part of the SRA, the differences between the two systems are evident. It is that rehabilitative focus that sets the juvenile system apart and as such, does not entitle juvenile offenders to a jury trial. *J.H.*, 96 Wn. App. at 175; *Chavez*, 163 Wn.2d at 269-70.

- b. There is no constitutional right to a jury trial for juvenile offenders because the penalties in the juvenile justice system are much different than the penalties imposed in the adult system.

The juvenile system and the adult system have distinctions and are not so similar as to require a jury trial for juvenile offenders. *See J.H.*, 96 Wn. App. at 175. The JJA seeks to rehabilitate the juvenile offender, but also to hold the offender responsible for his or her actions. *State v. Posey*, 161 Wn.2d 638, 645, 167 P.3d 560 (2007). The fact that punishment is a part of the JJA does not mean the right to a jury trial attaches. *See Schaaf*, 109 Wn.2d at 6-8 (addressing the argument that a jury trial is required under *Pasco v. Mace*, 98 Wn.2d 87, 100, 653 P.2d 618 (1982)). The court in *Schaaf* made it clear that the distinguishing factor in the two systems is the penalty imposed for the actions. *Schaaf*, 109 Wn.2d at 7-8. “No amount of analogizing between the adult and juvenile offenders serves to make the two classes equally accountable for their criminal actions.” *Id.* at 8. *See, e.g., Chavez*, 163 Wn.2d at 271 (noting that “[w]hereas in the juvenile system, one count of attempted first degree murder is punishable by 103 to 129 weeks (about 2 to 2 1/2 years), the same count in the adult criminal system is punishable by 180 to 240 months (15 to 20 years)”).

The range of sentencing options for the juvenile offender is much broader than for an adult offender. Juveniles may be able to avoid

prosecution through the benefit of a diversion agreement or deferred disposition. *Schaaf*, 109 Wn.2d at 8, 12; *J.H.*, 96 Wn. App. at 180-1. The juvenile court can use these sentencing options, which are not available at all or very limited in adult court, to tailor the sentence to the individual juvenile. *J.H.*, 96 Wn. App. at 180-81. The juvenile court can also determine the best course of treatment for the juvenile whereas the adult court can only order treatment if certain requirements are met. *Id.*

The fact that juveniles can be transferred to adult facilities to serve their time does not take away from the purpose of the juvenile system and does not cause the right to a jury to attach. *Monroe v. Solitz*, 132 Wn.2d 414, 420, 939 P.2d 205 (1997). Adult convictions have more serious consequences. *Id.* No matter where the juvenile serves the time, the consequences of an adult conviction versus a juvenile adjudication are decidedly different. *Id.*

A “stigma” is now associated with a juvenile adjudication but that has not been found to take away from the rehabilitative nature of the juvenile justice system. *J.H.*, 96 Wn. App. at 176-7. This stigma includes the fact that juvenile offenders have their DNA taken, their fingerprints taken, their photos taken, they can’t possess a firearm and there may be license and public assistance consequences. *Chavez*, 163 Wn.2d at 268; *J.H.*, 96 Wn. App. at 176-7. While respondents may not be able to have

the record of their second degree assault convictions sealed, the court in *J.H.* noted that the overall policy for records, and the stigma associated with a juvenile adjudication, did not eliminate the differences between the two systems or take away from the rehabilitative nature of the juvenile system. *J.H.*, 96 Wn. App. at 176-7.

As the court noted in *J.H.*, the fact that a “juvenile adjudication will be considered as criminal history in a later adult prosecution is not new.” *J.H.*, 96 Wn. App. at 175. The fact that the juvenile adjudications have to be used in sentencing calculations does not equal an extra penalty for the juvenile offender. *State v. Randle*, 47 Wn. App. 232, 241, 734 P.2d 51 (1987). Future consequences as an adult offender are not punishment for the current juvenile crime, and the court must look at whether the juvenile is being treated differently than an adult at the time of the juvenile offense. *J.H.*, 96 Wn. App. at 179.

The fact that juveniles have to pay restitution has been found to be remedial and not punitive. *J.H.*, 96 Wn. App. at 182 (*citing State v. Hartke*, 89 Wn. App. 143, 147, 948 P.2d 402 (1997)).

If respondents truly believed that the adult system would be no different than the treatment they received in the juvenile system, then they had the option of asking jurisdiction to be declined to the adult court. *See* RCW 13.40.110(1). Respondent did not ask for a decline hearing. The

lenient penalties in the juvenile system and the access to treatment highlight the difference between the adult and juvenile system and show why M.A.G. and others before him, did not ask to be transferred to the adult system. See *J.H.*, 96 Wn. App. at 183; *Chavez*, 163 Wn.2d at 271.

c. There is no right to a jury trial for juvenile offenders under the Washington State Constitution.

The court has analyzed the right to a jury trial for juveniles under the factors enumerated in *State v. Gunwall*, 106 Wn.2d 54, 61-62, 720 P.2d 808 (1986). *Schaaf*, 109 Wn.2d at 13-17. In analyzing the factors, the court rejected the argument that juveniles should have the right to a jury trial since they would have been guaranteed a jury trial when the state became a territory. *Id.* at 14. The court noted, “territorial lawmakers did not anticipate the enactment of a separate juvenile justice system.” *Id.* The court again reiterated that adult and juvenile systems are not mirror images of each other and that regressing to a time where juveniles were not afforded any special protections was not a desirable outcome. *Id.* at 15. After analyzing all the Gunwall factors, the court concluded that they should remain in the majority of the states that do not have jury trial for juvenile offenders and that those offenders are not entitled to a jury trial under the state constitution. *Id.* at 16. Since then, case law has continued

to uphold the Schaaf analysis of the Gunwall factors. See *J.H.*, 96 Wn. App. at 185; *Chavez*, 163 Wn.2d at 269, 272.

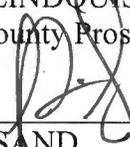
Respondent has cited no convincing authority granting him a right to a jury trial, dictating that a waiver of jury trial is necessary when there is no constitutional right to a jury trial, or showing that the proper remedy is reversal of his convictions. Respondent has failed to show that he had a right to a jury trial as a juvenile offender in the juvenile justice system.

D. CONCLUSION.

For the foregoing reasons, the State asks that this Court deny the respondent's claims and affirm the dispositional order.

DATED: November 30, 2018

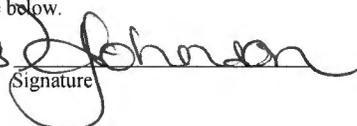
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11/30/18 
Date Signature

PIERCE COUNTY PROSECUTING ATTORNEY

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