

NO. 50137-6-II

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

STATE OF WASHINGTON
v.
OLEG KORNUA

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

The Honorable Bernard Veljacic, Judge

APPELLANT'S OPENING BRIEF

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A. ASSIGNMENTS OF ERROR

1. Kornuta's due process rights were violated by the state's failure to prove the essential elements of possession of a stolen vehicle.
2. Kornuta's due process rights were violated by the state's failure to prove all of the elements set forth in the charging document, including the elements the state unnecessarily added.
3. Kornuta's due process rights were violated by the state's failure to prove all of the elements set forth in the to-convict instruction, including the elements the state unnecessarily added.
4. Kornuta's due process rights were violated by the state improperly instructing the jury on the possession charge.

Issues Presented on Appeal

1. Did the state fail to prove that Kornuta knowingly possessed a stolen vehicle where the evidence was limited to finding Kornuta sitting in the car bent toward the steering column with something in his hand?
2. Did the state fail to prove that Kornuta withheld or appropriated the vehicle where the evidence was limited to finding Kornuta sitting in the car bent toward the steering column with

something in his hand?

3. To satisfy due process, once the state added unnecessary elements to the charging document, was the state required to prove all of the additional elements set forth in the charging document?

4. To satisfy due process, once the state added unnecessary elements to the to-convict instruction, was the state required to prove all of the additional elements set forth in the to-convict instruction?

B. STATEMENT OF THE CASE

1. Summary

The state charged Oleg Kornuta with possession of a stolen vehicle. The statute only required the state to prove knowing possession, but the state erroneously added the additional elements, 'withheld or appropriated', to both the charging document and the to the to-convict instruction. The only evidence against Kornuta was limited to his sitting in the driver's seat, bent forward with an unidentified item in his hand near a destroyed steering column. There was no forensic evidence linking Kornuta to the car and no evidence regarding the theft.

2. Facts

Oleg Kornuta was charged and convicted by a jury of one count of possession of a stolen vehicle. CP 12, 28. Keith Meisner noticed his 1992 Honda Accord was missing from its parking space across the street from his house. RP 93. Meisner first thought his old car had rolled down the hill, but called the police to report it as stolen. RP 95. Meisner informed the police that the doors had been locked and only his wife had permission to drive the car. RP 95.

Battle Ground police officer Joshua Phelps responded to Meisner's stolen car report and sent out a broadcast notifying other officers of the license plate and a description of the Honda. RP 29-31. Battle Ground Sergeant Timothy Wilson spotted a car matching the Honda's description parked in a stall behind the Battle Ground Community Center in a parking area for the community park. RP 63, 68-69.

Wilson initially did not see an occupant but as he approached, he observed Kornuta sitting in the driver's seat bent toward the steering area, with something in his hand. RP 70-71, 75, 82-83, 86. When Kornuta sat up the car began to roll backwards

until Kornuta used the emergency brake to stop the car. RP 72. Wilson ordered Kornuta out of the car and placed him under arrest. RP 73. Kornuta, who was wearing shorts and a red flannel shirt, was not properly dressed for the weather. RP 62.

No one had disturbed any of Meisner's expensive belongings left in the car. The items included a security badge, a laptop computer, a laptop carrying case, a blue tooth, and various tools. RP 104-06. Meisner did not recognize several items in the car, including a sweatshirt, several pieces of metal, broken spoons and a lighter. RP 101-102.

The police did not conduct any sort of fingerprint analysis on any of the items in the car or the car itself. RP 57. When the police found the car, the steering column had been altered and the car needed a new fuse to become operable. RP 33, 45, 104-05.

This timely appeal follows. CP 30.

C. ARGUMENTS

1. KORNUTA WAS DENIED DUE PROCESS WHERE THE CHARGING DOCUMENT CONTAINED ADDITIONAL NON-ESSENTIAL ELEMENTS THAT THE STATE FAILED

TO PROVE BEYOND A REASONABLE
DOUBT.

Here the state charged Kornuta with possession of a stolen motor vehicle. CP 12. The state added to this charge, definitional language that was not required: “that the defendant withheld or appropriated” the property. Id.

a. Possession of Stolen Motor Vehicle

The charging document provided in relevant part:

Kornuta....did knowingly possess...a 1992 Honda.....belonging to Keith Meisner, knowing that it had been stolen, and **did withhold or appropriate** the property to the use of a person other than the true owner or person entitled thereto....contrary to RCW 9A.56.068.

(Emphasis added) CP 12.

The state also added the following unnecessary definitional language to the to-convict instruction #7.

To convict the defendant of the crime of possessing a stolen motor vehicle, each of the following elements of the crime must be proved beyond a reasonable doubt: One, that on or about October 29th, 2016, the defendant knowingly possessed a stolen motor vehicle; two, that the defendant acted with knowledge that the motor vehicle had been stolen; three,

that the defendant withheld or appropriated
the motor vehicle to the use of someone other
than the true owner or person entitled thereto:

(Emphasis added) CP 19.

Jury instruction #6 defined the crime as follows:

Possessing a stolen motor vehicle means knowingly to receive, retain, possess, conceal, or dispose of a stolen motor vehicle, knowing that it has been stolen, **and to withhold or appropriate** the same to the use of any person other than the true owner or person entitled thereto.

(Emphasis added) CP 19; RP 121-22.

Recently, our State Supreme Court clarified that the definitional elements in possession of stolen property are not essential elements that must be included in the information. *State v. Porter*, 186 Wn.2d 85, 94-92, 375 P.3d 664 (2016).

In *Porter*, the charging document was sufficient because it referenced the applicable criminal statutes and stated that the defendant did “unlawfully and feloniously knowingly possess a stolen motor vehicle.” The state did not need to include the language defining “possess”, that specified that the defendant

“withheld or appropriated” the vehicle from the true owner. *Porter*, 186 Wn.2d at 87, 90-92.

However under the Law of the Case doctrine, “[i]n criminal cases, the State assumes the burden of proving otherwise unnecessary elements of the offense when such added elements are included without objection in the ‘to convict’ instruction.” *State v. Hickman*, 135 Wn.2d 97, 102, 954 P.2d 90 (1998); *Accord, State v. Jussila*, 197 Wn. App. 908, 931-32, 392 P.3d 1108 (2017).

In *Hickman*, the state added the non-essential element of the county in which the crime was allegedly committed. *Hickman*, 135 Wn.2d at 100. The Court held that the state was required to prove beyond a reasonable doubt the county, the unnecessary element it added in the “to-convict” instruction. *Hickman*, 135 Wn.2d at 102, 105 (citations omitted).

Similarly, in *Jussila*, the state added to the to-convict instructions, the non-essential element of the serial numbers for the stolen firearms. *Jussila*, 197 Wn. App. at 916-19. The Court in *Jussila*, applying *Hickman*, held the state was required to prove the serial numbers it added to the to-convict instructions. *Jussila*, 197

Wn. App. at 931.

b. Hickman Applies to This Case

Hickman applies to this case and required the state to prove the non-essential elements listed in the charging document and mirrored in the to-convict instructions. Under *Hickman*, and *Jussilia*, the language in the to-convict instruction “withheld or appropriated the property”, became the law of the case that the state was required to prove beyond a reasonable doubt. *Hickman*, 135 Wn.2d at 102, 105; *Jussilia*, 197 Wn. App. at 931. The state was also required to prove that Kornuta knew the vehicle was stolen. 9A.56.068.

c. Sufficiency

In every criminal prosecution, due process requires the state prove every fact necessary to constitute the charged crime beyond a reasonable doubt. *In re Winship*, 397 U.S. 358, 364, 90 S.Ct. 1068, 25 L.Ed.2d 368 (1970). In a challenge to the sufficiency of the evidence, the court views the evidence in the light most favorable to the prosecution and inquires whether the evidence was sufficient for a rational trier of fact to find guilt beyond a reasonable

doubt. *Jackson v. Virginia*, 443 U.S. 307, 319, 99 S.Ct. 2781, 61 L.Ed.2d 560 (1979), *overruled on other grounds by Schlup v. Delo*, 513 U.S. 298, 115 S.Ct. 851, 130 L.Ed.2d 808 (1995); *State v. Homan*, 181 Wn.2d 102, 105, 330 P.3d 182 (2014).

When evaluating whether sufficient evidence exists, the reviewing court assumes the truth of the state's evidence and all reasonable inferences drawn from that evidence. *Homan*, 181 Wn.2d at 106. Circumstantial evidence is treated the same as direct evidence. *State v. Farnsworth*, 185 Wn.2d 768, 775, 374 P.3d 1152 (2016).

More than a mere scintilla of evidence is needed to meet the beyond a reasonable doubt standard; "there must be that quantum of evidence necessary to establish circumstances from which the jury could reasonably infer the fact to be proved." *State v. Miller*, 60 Wn. App. 767, 772, 807 P.2d 893 (1991), *abrogated on other grounds in State v. Roggenkamp*, 153 Wn.2d 614, 106 P.3d 196 (2005).

In *State v. Liles*, 11 Wn. App. 166, 521 P.2d 973 (1974), the court explained:

When substantial evidence is present, the drawing of reasonable inferences therefrom and the doing of some conjecturing on the basis of such evidence is permissible and acceptable. If, however, the necessity for conjecture results from the fact that the evidence is merely scintilla evidence, then the necessity for conjecture is fatal.

Liles, 11 Wn. App. at 171 (*citation omitted*); accord, *State v. Harris*, 14 Wn. App. 414, 417–18, 542 P.2d 122 (1975).

(i). Possession of a Stolen Motor Vehicle.

“Bare possession of stolen property is insufficient to justify a conviction,” for possession of a stolen property. *State v. McPhee*, 156 Wn. App. 44, 62, 230 P.3d 284 (2010) (firearm). Knowledge may be proven if there is information from which a reasonable person would conclude the fact at issue. *State v. Shipp*, 93 Wn.2d 510, 514, 516, 610 P.2d 1322 (1980).

For example in *United States v. Howard*, 214 F.3d 361, 364 (2d Cir. 2000) the Second Circuit explained that the issues of illegal possession of a firearm does not establish knowledge that the purchased weapon was stolen. The Court reasoned:

[T]he fact that appellant may have known that as a convicted felon he could not lawfully

obtain a firearm does not tend to prove that he had reason to know that the gun in question was stolen. We have no basis on this record or on the arguments made to us to opine that such a significant portion of guns sold on the 'black market' are stolen that a purchaser would likely share such knowledge and believe that any particular gun sold on that market was even highly likely to have been stolen.

Howard, 214 F.3d at 364; *State v. Allen*, 138 Wn. App. 463, 471, 157 P.3d 893 (2007).

Similarly, here, the fact that Kornuta was inside the car did not permit the inference that Kornuta knew the car was stolen, any more than the evidence in *Howard* did not establish that Howard knew firearms were stolen. Here, the owner testified that his car was stolen but there was no evidence indicating that Kornuta knew the car was stolen. RP 93-95. It is equally as plausible that Korunta sought refuge in an abandoned car he stumbled upon.

This theory is supported by the fact that there were other valuable items in the car such as a computer, a blue tooth and a security badge that were not disturbed. RP 105-06. If a person knowingly possessed a stolen car, he would also likely take possession of other valuable items in the car, rather than simply

taking refuge.

In a possession of stolen property case, if the accused makes inconsistent or improbable statements about how the item came into the possession of the person, this can be considered slight additional evidence sufficient to establish the knowledge element. *State v. Pisauro*, 14 Wn. App. 217, 220–21, 540 P.2d 447 (1975); *State v. Withers*, 8 Wn. App. 123, 128, 504 P.2d 1151 (1972), *citing State v. Portee*, 25 Wn.2d 246, 170 P.2d 326 (1946). *See also, State v. Ladely*, 82 Wn.2d 172, 174-76, 509 P.2d 658 (1973) (evidence sufficient to establish guilt where defendant gave police three different versions about his ownership of stolen antique gun).

Likewise, familiarity with the location of the theft when combined with a dubious explanation has also been held sufficient to show knowledge that property was stolen. *State v. Smyth*, 7 Wn. App. 50, 499 P.2d 63 (1972). For example, Smyth admitted he had visited the home the property was stolen from on several occasions. *Smyth*, 7 Wn. App at 51–52. There was also evidence he attempted to obtain a fictitious bill of sale while he was in jail

awaiting trial. *Id.* at 52–54. On appeal, the court held that these facts, taken together, were sufficient to submit the question of guilt to the jury. *Smyth*, 7 Wn. App at 53–54.

In Kornuta’s case, there was no information about how the car was stolen. There were no inconsistent statements and nothing linking Kornuta to the location of the theft. The owner initially believed that his 24 year old car could have rolled away down the hill due to a brake failure, or it could have been stolen. RP 95. The police found Kornuta in the car bent over with something in his hand, but there was no testimony that this item was a tool used to drive the car. RP 70-71. Likewise, there was no testimony that the car was driven to the parking spot or any explanation for why Kornuta was in the car. RP 53.

In this case there was no corroborative evidence like in *Ladely* and *Smyth*. *Ladely*, 82 Wn.2d at 172, 174-76; *Smyth*, 7 Wn. App at 53–54. The evidence in this case when viewed in the light most favorable to the state establishes bare possession which is insufficient to establish that Kornuta knew the car was stolen or that he appropriated or withheld the car. Accordingly, this Court must

reverse and remand for dismissal with prejudice.

2. THE COURT'S TO-CONVICT
INSTRUCTION FOR POSSESSION OF
A STOLEN VEHICLE VIOLATED
KORNUTA'S RIGHT TO DUE
PROCESS

Jury instructions are reviewed de novo. *Anfinson v. FedEx Ground Package Sys., Inc.*, 174 Wn.2d 851, 860, 281 P.3d 289 (2012). Instructions that violate an accused person's constitutional rights create manifest error and may be raised for the first time on appeal. RAP 2.5(a)(3). Issues of statutory interpretation are also reviewed de novo. *Barton v. State, Dep't of Transp.*, 178 Wn.2d 193, 202, 308 P.3d 597 (2013).

The court's instructions permitted the jury to convict Kornuta for possession of a stolen vehicle even if the state did not prove each element of the crime, because it inaccurately stated the elements. Due process requires the state to prove each element of a charged offense beyond a reasonable doubt. *Winship*, 397 U.S. 358; U.S. Const. Amend. XIV; Wash. Const. art. I, § 3.

The jury is entitled to regard the court's to-convict instruction as a yardstick against which to measure guilt or innocence. *State v.*

Mills, 154 Wn.2d 1, 6, 109 P.3d 415 (2005). A to-convict instruction violates due process if it permits conviction absent proof of each element of a charged offense. *Id.* at 7. A court's instructions are improper if they inaccurately state the law or mislead the jury. *State v. Bennett*, 161 Wn.2d 303, 307, 165 P.3d 1241 (2007). An improper jury instruction affecting a constitutional right requires reversal unless the state can demonstrate beyond a reasonable doubt that it did not contribute to the verdict. *State v. Montgomery*, 163 Wn.2d 577, 600, 183 P.3d 267 (2008).

A statute must be construed according to its plain language. *Seashore Villa Ass'n v. Hugglund Family Ltd. P'ship*, 163 Wn. App. 531, 538-39, 260 P.3d 906 (2011) *review denied*, 173 Wn.2d 1036, 277 P.3d 669 (2012). If the statute's language is unambiguous, the analysis ends. *Id.* An interpretation that leads to absurd results must be rejected, as it "would belie legislative intent." *Troxell v. Rainier Public School Dist. No. 307*, 154 Wn.2d 345, 350, 111 P.3d 1173 (2005). Under the maxim *expressio unius est exclusio alterius*, statutory omissions are deemed to be exclusions. *In re Detention of Martin*, 163 Wn.2d 501, 510, 182 P.3d 951 (2008).

The statute criminalizing possession of a stolen vehicle covers simple possession of a stolen vehicle. RCW 9A.56.068. Possession of stolen property, on the other hand, is defined more broadly as: knowingly to receive, retain, possess, conceal, or dispose of stolen property knowing that it has been stolen and to withhold or appropriate the same to the use of any person other than the true owner or person entitled thereto. RCW 9A.56.140(1).

By its plain language, this definition applies only to “possession of stolen property.” RCW 9A.56.140(1); *Seashore Villa Ass’n*, 163 Wn. App. at 538-39. The legislature’s omission of possession of a stolen vehicle from the definition of possession of stolen property indicates an intentional exclusion. *Martin*, 163 Wn.2d at 510.

Here, the court instructed the jury that it could convict Kornuta for possession of a stolen vehicle if they found that he “knowingly received, retained, possessed, or disposed of a stolen motor vehicle.” CP 28. This language is taken from the pattern to-convict instruction for possession of a stolen vehicle. WPIC 77.21. The instruction’s comment acknowledges that the legislature did

not apply the definition of possession of stolen property to the offense of possession of a stolen vehicle. Comment to WPIC 77.21. Still, the WPIC committee chose to include it in the instruction to prevent possession of a stolen vehicle from becoming a strict liability offense. Comment to WPIC 77.21.

But a court can prevent possession of a stolen vehicle from becoming a strict liability offense by inferring a knowledge requirement without needlessly incorporating the broader definition of possession from the statutory definition of possession of stolen property. See e.g. *State v. Anderson*, 141 Wn.2d 357, 5 P.3d 1247 (2000). Additionally, the issue of whether possession of a stolen vehicle is a strict liability offense is not relevant to Kornuta's case and does not affect his due process right to have the jury instructed in a manner permitting conviction only if the state proves each element of the offense with which he was charged.

The court's instruction violated Kornuta's right to due process by permitting conviction for sitting in a vehicle even if the state did not prove that Kornuta actually possessed it, knew it was stolen, or that he withheld or appropriated the vehicle. *Mills*, 154

Wn.2d at 6. The state cannot demonstrate that this constitutional error was harmless beyond a reasonable doubt. *Montgomery*, 163 Wn.2d at 600.

The only evidence in this case regarding possession was the fact that Kornuta was sitting in the car, fiddling with the area around the steering column. There were also tools and a sweatshirt in the car that were never determined to belong to Kornuta. RP 103-06. The jury could have found that Kornuta had taken brief refuge in the car without knowledge that it was stolen and without being in possession of the car.

Accordingly, the jury could have convicted Kornuta for possession of a stolen vehicle even if the state did not prove that he actually possessed it. The court's instructions violated Kornuta's right to due process by permitting conviction even if the state did not prove each element of the charge. *Mills*, 154 Wn.2d at 6. Kornuta's conviction for possession of a stolen vehicle must be reversed. *Id.*

D. CONCLUSION

Oleg Kornuta respectfully requests this Court reverse his conviction based on insufficient evidence and remand for dismissal with prejudice for insufficient evidence. In the alternative, Kornuta requests this Court reverse and remand for a new trial based on due process violation regarding jury instructions.

DATED this 27th day June 2017

Respectfully submitted,



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I, Lise Ellner, a person over the age of 18 years of age, served the Clark County Prosecutor at prosecutor@clark.wa.gov and Oleg Kornuta/DOC#356933, Olympic Corrections Center, 11235 Hoh Mainline, Forks, WA 98331 a true copy of the document to which this certificate is affixed, on June 27, 2017. Service was made electronically to the prosecutor and via U.S. Mail to Oleg Kornuta.



Signature

LAW OFFICES OF LISE ELLNER

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