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

STATE OF WASHINGTON, Respondent

v.

JIMMY NEWSOM, Appellant

FROM THE SUPERIOR COURT FOR CLARK COUNTY
CLARK COUNTY SUPERIOR COURT CAUSE NO.16-1-01803-3

BRIEF OF RESPONDENT

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RESPONSE TO ASSIGNMENTS OF ERROR

- I. **The evidence was sufficient to support Newsom's conviction for unlawful possession of a firearm in the first degree.**
- II. **The trial court erred in imposing consecutive sentences; however the remedy is to remand the case for resentencing.**
- III. **The trial court did not abuse its discretion in requiring Newsom to have no contact with Tyler Lawhead as a condition of the sentence.**

STATEMENT OF THE CASE

The State substantially agrees with the statement of facts laid out by Newsom as it relates to the factual history of the case. The State sets out these additional facts that pertain directly to the issues on appeal.

The State charged Jimmy Newsom (hereafter "Newsom") by information for an incident occurring on August 27, 2016 with four counts: robbery in the first degree, possession of a controlled substance – heroin (hereafter "PCS-heroin"), unlawful possession of a firearm in the second degree (hereafter "UPF 2"), and unlawful possession of a firearm in the first degree (hereafter "UPF 1"). CP 22-23.

Newsom went to trial on the above listed charges on December 12, 2016. RP 5. Vancouver Police Officer Ron Stevens testified that while he was on patrol he saw two men chasing each other on foot. RP 59-60.

Those two men were Newsom and Tyler Lawhead. RP 59-60. Mr. Lawhead testified that Newsom had robbed him. RP 109-116. Officer Stevens testified that Mr. Lawhead told him at the scene that Newsom had a gun and that “it’s a small gun. It looked to be silver.” RP 62. A small silver pistol was then found by officers in the street near the curb not far from where Newsom was stopped by officers. RP 144, 146-48.

Mr. Lawhead testified at trial that he saw Newsom making gestures to his waistband like he had a gun, and he testified he saw Newsom have three inches of something shiny in the waistband. RP 275, 280-81. Mr. Lawhead interpreted what he saw as Newsom having a gun or a knife. RP 281.

At trial, the State presented evidence through a deputy prosecuting attorney, Bob Shannon, that he handled a guilty plea by Newsom in Clark County on July 22, 2016 on case 16-1-01269-8. RP 221, 225; *See Ex. 20A*. He identified Newsom by sight in court, and also identified the guilty plea form Newsom signed when he pleaded guilty in Clark County. RP 221, 223-25.

Through Mr. Shannon, the State admitted three documents relating to a 2007 conviction for Newsom from Multnomah County, Oregon for unlawful delivery of cocaine. RP 227-231. The State admitted a certified copy of the prior judgment for Oregon case 061136396, which was for

unlawful delivery of cocaine. RP 231; *See* Ex. 19. The State also admitted an indictment for Oregon case 06-11-36396 for unlawful delivery of cocaine. RP 231; *See* Ex. 17. Finally, the State admitted a guilty plea petition for Oregon case 0611-36396 unlawful delivery of cocaine, signed by Jimmy Newsom. RP 231; *See* 18. On all three documents, the defendant's name was the same "Jimmy Newsom," and the judgment and indictment had the same date of birth of "9/12/1981" while the guilty plea petition reflected "Jimmy Newsom" was 25 years old on 4/16/2007. *See* Ex. 17, 18, 19.

Mr. Shannon also testified that the signature on the guilty plea petition from Multnomah County, OR had a similar signature to Newsom's signature on his Clark County guilty plea form. RP 229; *See* Ex. 18, 20A. The Clark County guilty plea form was redacted to remove Newsom's offender score, the drug court contract, and the criminal history, and the redacted copy was admitted as exhibit 20A and provided to the jury during deliberations. RP 242-45; CP 45-46; *See* Ex. 20A.

The jury returned guilty verdicts on UPF 1, UPF 2, and PCS-heroin, while acquitting on the robbery in the first degree charge. RP 337-38; CP 86-89.

On January 23, 2017, the trial court sentenced Newsom on the current case and on two other Clark County cases: 16-1-01268-0 and 16-1-

01269-8. RP 342, 353-55. Case 16-1-01269-8 and case 16-1-01268-0 were cases that Newsom had previously pleaded guilty to and for which he had entered drug court. *See* Ex. 20A; RP 221, 347; CP 143-157, 158-172. For the current case, the trial court sentenced Newsom to 100 months on the UPF 1 charge and 24 months on the PCS-heroin charge, to run concurrently. RP 353-354; CP 120-135. At the sentencing, the State and Newsom agreed to dismiss the UPF 2 charge. RP 343-44. On the two drug court cases, Newsom was sentenced to 29 and 24 months, respectively. RP 353; CP 143-157; CP 158-172. The trial court ordered that the two drug court cases run concurrently with each other, but that they would run consecutively to the sentence on the current case. RP 353-54. The trial court justified its ruling by stating that:

And it's the only thing that makes any sense. I mean they gave you drug court and you violated every condition of your drug court issue, and they had already entered the plea and you knew what the sentencing range was for that.

RP 354. The trial court did not enter written findings for imposing the sentences. The trial court also ordered no contact with Tyler Lawhead as part of Newsom's sentence on the current case. CP 120-135. This timely appeal followed. CP 119.

ARGUMENT

I. There was sufficient evidence to support Newsom's conviction for unlawful possession of a firearm in the first degree.

Newsom claims that substantial evidence does not support his conviction for UPF 1, because the State did not properly prove his prior conviction for a serious offense. Newsom argues that State's evidence was insufficient, because the only evidence submitted by the State was an Oregon judgment for unlawful delivery of cocaine in 2007. Newsom further argues that absent any independent evidence, the Oregon judgment was insufficient to prove this prior offense. However, the State submitted additional independent evidence beyond the judgment that proved the Oregon conviction was for Newsom. The State presented sufficient evidence to prove Newsom committed the crime of UPF 1. Newsom's claim fails.

The State is required under the Due Process Clause to prove all the necessary elements of the crime charged beyond a reasonable doubt. U.S. Const. amend. XIV, § 1; *In re Winship*, 397 U.S. 358, 362-65, 90 S. Ct 1068, 25 L.Ed.2d 368 (1970); *State v. Colquitt*, 133 Wn.App. 789, 796, 137 P.3d 893 (2006). When determining whether there is sufficient evidence to support a conviction, the evidence must be viewed in the light most favorable to the State. *State v. Salinas*, 119 Wn.2d 192, 201, 829

P.2d 1068 (1992). If “any rational jury could find the essential elements of the crime beyond a reasonable doubt”, the evidence is deemed sufficient.

Id.

An appellant challenging the sufficiency of evidence presented at a trial “admits the truth of the State’s evidence” and all reasonable inferences therefrom are drawn in favor of the State. *State v. Goodman*, 150 Wn.2d 774, 781, 83 P.2d 410 (2004). The reviewing court defers to the trier of fact on issues of conflicting testimony, credibility of witnesses, and the persuasiveness of the evidence. *State v. Camarillo*, 115 Wn.2d 60, 71, 794 P.2d 850 (1990); *State v. Walton*, 64 Wn.App. 410, 415-16, 824 P.2d 533 (1992). When examining the sufficiency of the evidence, circumstantial evidence is just as reliable as direct evidence. *State v. Delmarter*, 94 Wn.2d 634, 638, 618 P.2d 99 (1980).

When a prior conviction is an essential element of the current charged crime, evidence of name alone is insufficient to prove identity. *State v. Hunter*, 29 Wn.App. 218, 221, 627 P.2d 1339 (1981). Some additional independent evidence is required to prove the person named in the prior conviction is the defendant currently on trial. *Hunter*, 29 Wn.App. at 221; citing *State v. Harkness*, 1 Wn.2d 530, 96 P.2d 460 (1939); *State v. Brezillac*, 19 Wn.App. 11, 573 P.2d 1343 (1978); and *State v. Clark*, 18 Wn.App. 831, 832 n.1, 572 P.2d 734 (1977). Once the

State presents sufficient independent evidence to establish identity, the burden then shifts to the defendant to present evidence casting doubt on identity. *Hunter*, 29 Wn.App. at 221; citing *Brezillac*, 19 Wn.App. 11.

The State can sustain its burden of proving a defendant's identity in a variety of ways, including distinctive personal information or admissions by the defendant that the prior convictions were part of his criminal history. *See State v. Huber*, 129 Wn.App. 499, 502, 119 P.3d 388 (2005) (citing *Brezillac*, 19 Wn.App. at 13 and *State v. Johnson*, 33 Wn.App. 534, 538, 656 P.2d 1099 (1982)).

In *Brezillac*, the defendant was facing a habitual criminal proceeding where the State was attempting to prove six prior convictions from Georgia. 19 Wn.App. at 12-13. The State admitted certified copies of judgments and sentences for the convictions, and also prison records for the convictions. *Id.* at 13. The prison records for three of the prior convictions did not contain specific verifying information, such as photos and physical descriptors. *Id.* However, a prima facie case of identity was established for these three convictions, because all the documents taken together were sufficiently similar. *Id.* at 14-15. The Court relied on the fact that the name of the defendant was the same in all six convictions, the defendant committed the same crime in five of the convictions, and the crimes were committed contemporaneously with each other. *Id.* at 15. The

Court held that these similarities were “more than mere identity of names,” and that the “possibility of another Mitchell T. Brezillac committing the same crimes, in the same county of the same state, during the same period of time, is far too remote.” *Id.*

The State presented sufficient evidence for any reasonable jury to find that Newsom had the prior conviction out of the State of Oregon. The State proved Newsom’s identity beyond a reasonable doubt as the person convicted of the delivery of cocaine in Oregon in 2007¹. The State admitted more than just the certified copy of the prior judgment for Oregon case 061136396. RP 231; *See* Ex. 19. The State also admitted an indictment for Oregon case 06-11-36396, and a guilty plea petition for Oregon case 0611-36396. RP 231; *See* Ex. 17, 18. On all three documents, the defendant’s name was the same “Jimmy Newsom,” and the judgment and indictment had the same date of birth of “9/12/1981” while the guilty plea petition reflected “Jimmy Newsom” was 25 years old on 4/16/2007, which matches up with a birthdate of 9/12/1981. *See* Ex. 17, 18, 19. All three of these documents were from Multnomah County, Oregon. *See* Ex.

¹ Unlawful delivery of cocaine is a class B felony in Oregon, and is defined as “it is unlawful for any person to deliver cocaine.” ORS 475.880. This offense is comparable to the Washington crime of possession with intent to deliver – cocaine, which is defined as “it is unlawful for any person to... deliver a controlled substance.” RCW 69.50.401(1). Cocaine is explicitly defined as a schedule II controlled substance, making its delivery a Class B felony. RCW 69.50.401(2)(a);RCW 69.50.206(b)(4). Therefore, Newsom’s 2007 Oregon unlawful delivery of cocaine is a serious offense under RCW 9.41.010(23)(b);(o).

17, 18, 19. Furthermore, all three documents reflect that Newsom committed the crime of unlawful delivery of cocaine on November 8, 2006. *See* Ex. 17, 18, 19.

These additional documents are similar to the judgments and prison records in *Brezillac*. Just as in *Brezillac*, it is far too remote of a possibility that another Jimmy Newsom was indicted for unlawful delivery of cocaine on November 8, 2006 in Multnomah County, OR, pleaded guilty to that offense, and was sentenced to that offense, all under the same cause number with the same date of birth. 19 Wn.App. at 15. The State is only required to present sufficient evidence from which a jury could find the defendant is the same person previously convicted. *Id.* at 14-15; *Hunter*, 29 Wn.App. at 221-22. The indictment and guilty plea petition in this case sufficiently corroborate the judgment, and along with Newsom's age and date of birth all matching across all the documents and the current case, these additional documents establish a prima facie case of identity.

The State also presented additional independent evidence of identity to the jury. Mr. Shannon testified that he handled a guilty plea by Newsom in Clark County on July 22, 2016 on case 16-1-01269-8. RP 221, 225; *See* Ex. 20A. He identified Newsom by sight in court, and also identified the guilty plea form Newsom signed when he pleaded guilty. RP

221, 223-25. Mr. Shannon also testified that the signature on the guilty plea petition from Multnomah County, OR had a similar signature to Newsom's signature on his Clark County guilty plea form. RP 229; *See* Ex. 19, 20A.

The Clark County guilty plea form itself further corroborated the identity of Newsom as the defendant in the 2007 Oregon conviction, because the name and signatures appear to be identical. Mr. Shannon testified that the signatures were similar between the Oregon and Clark County documents, and the jury had the opportunity to compare the two. RP 229; *See* Ex. 19, 20A. When comparing the two signatures, they are very similar with distinct a "J" and "N," which further establishes that the same "Jimmy Newsom" signed both documents. *See* Ex. 19, 20A. The signatures and testimony from Mr. Shannon, who was present when Newsom signed the Clark County guilty plea form, is further evidence, independent of the Oregon judgment, that Newsom was convicted of the 2007 Oregon offense.

When taking all reasonable inferences in a light most favorable to the State, the indictment and guilty plea petition for the Oregon conviction, the prior Clark County judgment and sentence, and the testimony from Mr. Shannon established beyond a reasonable doubt that Newsom was the person convicted in Oregon in 2007. Thus, the State

presented sufficient independent evidence to establish a prima facie case of Newsom's identity. Newsom's claim fails.

II. The trial court erred in imposing consecutive sentences; however the remedy is to remand the case for resentencing.

Newsom claims that the trial court erred when it imposed consecutive sentences on three separate cases sentenced on the same day. Newsom further argues that the remedy is for this Court to order that Newsom be resentenced to concurrent sentences. The State concedes that the trial court erred when imposing consecutive sentences when Newsom was sentenced on three cases on the same day, because the trial court did not enter written findings supporting the consecutive sentences. However, the remedy is to remand the case for the trial court to resentence Newsom.

A current offense is considered all convictions entered or sentenced on the same day. *In re Finstad*, 177 Wn.2d 501, 507-8, 301 P.3d 450 (2013); citing RCW 9.94A.525(1). Under RCW 9.94A.589(1)(a), when a person is sentenced to current offenses the sentences are to be served concurrently. A consecutive sentence may only be imposed under the exceptional sentence provisions of RCW 9.94A.535. RCW 9.94A.589(1)(a).

A trial court is required to enter written findings of fact and conclusions of law when a giving a sentence outside of the standard range.

RCW 9.94A.535. “A trial court’s failure to enter written findings of fact and conclusions of law to support an exceptional sentence requires remand.” *State v. Shemesh*, 187 Wn.App. 136, 148, 347 P.3d 1096 (2015); citing *State v. Friedlund*, 182 Wn.2d 388, 397-97, 341 P.3d 280 (2015). If a reviewing court cannot determine from the record that a trial court would have imposed an exceptional sentence if it had only considered valid aggravating factors, remanding for resentencing is required. *State v. Smith*, 67 Wn.App. 81, 92, 834 P.2d 26 (1992); citing *State v. Barnes*, 117 Wn.2d 701, 712, 818 P.2d 1088 (1991) (citing *State v. Dunaway*, 109 Wn.2d 207, 220, 743 P.2d 1237, 749 P.2d 160 (1987)).

In the present case, the trial court handed down an exceptional sentence when it sentenced Newsom to consecutive sentences on cases sentenced on the same day. RP 353-54. The trial court made an oral ruling for the basis of the consecutive sentence, but there is no record that written findings of fact and conclusions of law were entered. RP 354. Furthermore, the grounds that the trial court relied upon in handing down an exceptional sentence are not clear from the record, making remand for resentencing necessary. RP 353-54; *Smith*, 67 Wn.App. at 92. Newsom’s claim that the case must be remanded for the vacation of the sentences and imposition of concurrent sentences is without merit. Therefore, this Court must remand the case for the trial court to resentence Newsom.

III. The trial court did not abuse its discretion in requiring Newsom to have no contact with Tyler Lawhead as a condition of the sentence.

Newsom claims that the trial court lacked the authority to impose no contact with Tyler Lawhead for his UPF 1 and PCS – heroin convictions. Newsom argues that because Mr. Lawhead was the named victim in the robbery in the first degree charge, and Newsom was acquitted of that charge, there was no authority to impose no contact. However, the trial court did not abuse its discretion in ordering the no contact condition, because a trial court has the authority to order no contact between a defendant and a witness to a crime. Mr. Lawhead was a witness to the UPF 1 crime, thus giving the trial court authority to order no contact. Newsom’s claim fails.

A trial court has the discretion to impose and enforce crime-related prohibitions as part of a sentence. *State v. Polk*, 187 Wn.App. 380, 397, 348 P.3d 1255 (2015); citing former RCW 9.94A.505(8)². “The imposition of crime-related prohibitions is reviewed for an abuse of discretion.” *Polk*, 187 Wn.App. at 397; citing *State v. Armendariz*, 160 Wn.2d 106, 110, 156 P.3d 201 (2007). An abuse of discretion occurs when the trial court’s exercise of discretion is manifestly unreasonable or based

² *State v. Polk*, 187 Wn.App at 380, cites to RCW 9.94A.505(8), which was amended on July 24, 2015. H.B. 1943, 2015 Wash. Legis. Serv. Ch. 287. That amendment’s effect on former RCW 9.94A.505(8) was simply to recodify it as RCW 9.94A.505(9).

upon untenable grounds or reasons. *State v. Finch*, 137 Wn.2d 792, 981, 975 P.2d 967 (1999) (citing *State v. Stenson*, 132 Wn.2d 668, 701, 940 P.2d 1239 (1997)).

A crime-related prohibition is defined as “an order of a court prohibiting conduct that directly relates to the circumstances of the crime for which the offender has been convicted.” RCW 9.94A.030(10). No contact orders are a form of crime-related prohibition a trial court can impose in its sentencing discretion. See *Polk*, 187 Wn.App. at 397-98. *Armendariz*, 160 Wn.2d at 110; *State v. Ancira*, 107 Wn.App. 650, 656, 27 P.3d 1246 (2001). No contact orders with witnesses to the crime are authorized under 9.94A.505(9) and 9.94A.030(10), because they relate to the circumstances of the crime. *Armendariz*, 160 Wn.2d at 110.

Mr. Lawhead was a witness to the UPF 1 and UPF 2 charges, thus giving the trial court the authority to order no contact between Newsom and Mr. Lawhead. Mr. Lawhead testified that he saw Newsom making gestures to his waistband like he had a gun, and he testified he saw Newsom have three inches of something shiny. RP 275, 280-81. Mr. Lawhead interpreted what he saw as Newsom having a gun or a knife. RP 281. Officer Stevens testified that Mr. Lawhead told him that Newsom had a gun and that “it’s a small gun. It looked to be silver.” RP 62. A small

silver pistol was then found by officers in the street near the curb not far from where Newsom was stopped by officers. RP 144, 146-48.

This evidence shows that Mr. Lawhead, based on his testimony at trial and prior statements he made to officers, was a direct witness to the crimes of UPF 1 and UPF 2. A witness to a crime relates to the circumstances of that crime, thus giving a sentencing court authority to impose a no contact order to protect that witness. *Armendariz*, 160 Wn.2d at 110 Mr. Lawhead was a witness to the crimes that Newsom was convicted of, so the trial court did not abuse its discretion in imposing no contact as a condition of the sentence. Newsom's claim fails.

CONCLUSION

The State respectfully asks this Court to affirm Newsom's convictions and remand the case for the trial court to enter written findings of fact and conclusions of law for the exceptional sentence.

DATED this 14 day of November, 2017.

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