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NO. 50674-2-II

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

STATE OF WASHINGTON,

Respondent,

v.

JAMES LOUTHAN,
Appellant.

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

Lewis County Cause No. 17-1-00403-5

The Honorable James W. Lawler, Judge

BRIEF OF APPELLANT

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ISSUES AND ASSIGNMENTS OF ERROR

1. The trial court violated Mr. Louthan's Fourth and Fourteenth Amendment rights to be free from unreasonable search and seizure when it denied his suppression motion.
2. The trial court violated Mr. Louthan's Wash. Const. art. I, § 7 right to be free from unlawful disturbance in his private affairs when it denied his suppression motion.
3. The officers unlawfully detained Mr. Louthan when they prohibited him from terminating their encounter after their suspicion of criminal activity had been dispelled.
4. The officers' actions cannot be justified under the "community caretaking" exception to the warrant requirement.
5. Even if Mr. Louthan was not unlawfully detained, the search of his pockets violated his constitutional rights because it went beyond the scope of a protective weapons frisk.
6. The trial court erred by entering Finding of Fact 1.7.
7. The trial court erred by entering Finding of Fact 1.19.
8. The trial court erred by entering Finding of Fact 1.21.
9. The trial court erred by entering Finding of Fact 1.22.
10. The trial court erred by entering Finding of Fact 1.25.
11. The trial court erred by entering Finding of Fact 1.26.
12. The trial court erred by entering Finding of Fact 1.27.
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14. The trial court erred by entering Conclusion of Law 2.2.
15. The trial court erred by entering Conclusion of Law 2.3.

ISSUE 1: A person is seized by the police for constitutional purposes when a reasonable person in his/her situation would not have felt free to terminate the encounter and walk away. Was Mr. Louthan seized by the officers when they prohibited him from continuing to wait in the area where he was located, prohibited him from walking away, and prohibited him from knocking on the nearby door of an acquaintance; leaving him no option but to "accept a ride" from the officers?

ISSUE 2: A police officer may seize a person without a warrant under the “community caretaking” function when necessary to provide emergency aid or to conduct a health and safety check. Did the officers’ actions go beyond the permissible scope of the “community caretaking” function when they forced Mr. Louthan to accept a ride to a gas station when he did not appear to be in any kind of medical distress, said he was “fine,” and declined an offer for medical aid?

ISSUE 3: Before a police officer allows a person to enter his/her patrol car, the officer may conduct a protective frisk, limited in scope to searching for weapons. Did the deputy in Mr. Louthan’s case go beyond the scope of a permissible weapons pat-down by reaching into Mr. Louthan’s pocket and pulling out a work glove, which was found to contain a small amount of drugs?

STATEMENT OF FACTS AND PRIOR PROCEEDINGS

James Louthan was walking around the Doty area of Lewis County in the early morning hours of a day in June. RP 4, 11. He had lost track of his best friend, who was from the area. RP 24. That friend was driving around the same area, looking for Mr. Louthan. RP 24. Neither of the men had cell phone service in the remote area, so they were having trouble contacting one another. RP 24.

Mr. Louthan's friend's sister owns the store in Doty. RP 24. His friend's mother lives next door to the store. RP 24. Mr. Louthan was debating whether he should wait longer for his friend to find him, wake up his friend's mother or sister, or walk back to where he had last seen his friend. RP 24-26. He smoked a cigarette and peeked into the windows of the Doty store. RP 7.

A resident of the area thought Mr. Louthan looked suspicious and called 911. RP 7. Two police officers – one sheriff's deputy and one state trooper -- responded and pulled up to where Mr. Louthan was standing. RP 4, 6.

Mr. Louthan explained to the officers what was going on. RP 11-12. The officers came to understand that he was not engaging in any

criminal activity. RP 12. All of the officers' suspicions were dispelled.
RP 12.

The conversation between Mr. Louthan and the officers turned to where Mr. Louthan was going to go. RP 12. The deputy used his phone to try to call Mr. Louthan's friend, but the call did not go through. RP 14.

Mr. Louthan asked the officers if they would allow him to knock on the door of his friend's mother or sister. RP 25. The officers told him that that "was not a good idea." RP 25.

The officers also told Mr. Louthan that it was "not a good idea" for him to stay in the area to wait for his friend. RP 15.

So Mr. Louthan told the officers that, in that case, he wanted to just keep walking down the highway to try to find his friend. RP 26. The officers told him that "was not an option." RP 26.

The deputy then told Mr. Louthan that he would give him a ride to a gas station or other location, but that he would have to make sure Mr. Louthan did not have any weapons or drugs first. RP 16. But the deputy did not explicitly tell Mr. Louthan that he would be searched. RP 20.

Feeling he had no other choice, Mr. Louthan accepted a ride from the deputy. RP 26.

The deputy conducted a thorough search of Mr. Louthan, including the insides of his pockets. RP 8. 20. The deputy pulled a work glove out

of Mr. Louthan's back pocket and discovered a small bag containing what appeared to be methamphetamine. RP 8, 20.

The officers arrested Mr. Louthan and the state charged him with possession of methamphetamine. CP 1-2. Mr. Louthan moved to suppress the drugs as the product of an unlawful search. CP 4.

At the suppression hearing, the officers testified that Mr. Louthan had told them that he was diabetic and had not eaten in a long time. RP 20. He also told them that he was cold. RP 20. They asked Mr. Louthan if he would like them to call and "aid car" because of his health issues but Mr. Louthan said that he was fine.¹ RP 14.

The officers admitted that they mentioned Mr. Louthan's active warrants while pressing him to accept a ride. RP 16, 22, 26. The officers testified that they never confirmed that the warrants were active and had no intention of arresting Mr. Louthan on those warrants. RP 8, 13, 17. But Mr. Louthan took the statements as a threat to arrest him if he did not accept the ride. RP 26-27.

The court denied Mr. Louthan's motion to suppress the drugs. RP 41; CP 20-24.

¹ The trooper's dashboard camera recorded almost the entire interaction, which was played at the suppression hearing. RP 4-5; Ex. 1. Accordingly, there was essentially no dispute at the hearing regarding what was actually said by each party. *See* RP 1-33 *generally*.

The court found that Mr. Louthan consented to the search when he accepted the ride from the deputy. CP 22. The court also found that the officers did not permit Mr. Louthan to remain in the area, walk down the highway, or try to wake up his friend's family. CP 22.

The court found Mr. Louthan guilty of possession of methamphetamine at a stipulated facts trial. CP 17-19. This timely appeal follows. CP 40.

ARGUMENT

THE TRIAL COURT ERRED BY DENYING MR. LOUTHAN'S MOTION TO SUPPRESS THE DRUG EVIDENCE, WHICH WAS DISCOVERED PURSUANT TO HIS UNCONSTITUTIONAL SEARCH AND SEIZURE.

Both the U.S. and Washington Constitutions protect individuals against warrantless searches and seizures by the police. U.S. Const. Amends. IV, XIV; art. I, § 7.

It is "well established" that the Washington State Constitution provides greater protection against search and seizure than the Fourth Amendment. *State v. Flores*, 186 Wn.2d 506, 512, 379 P.3d 104 (2016). Under art. I, § 7, there is "almost an absolute bar to warrantless seizures, with only limited, 'jealously guarded exceptions.'" *Id.*

Whether a search or seizure violates the constitution is a question of law, reviewed *de novo*. *State v. Harrington*, 167 Wn.2d 656, 662, 222 P.3d 92 (2009).

If the police unconstitutionally seize an individual or conduct an unlawful search, any resulting evidence must be excluded at trial. *Id.* at 664.

A. Mr. Louthan was unlawfully detained when the officers refused to allow him to remain in the area, to walk away, or to knock on his friend's mother's door. A reasonable person in his situation would not have felt free to leave.

1. Mr. Louthan did not consent to a ride with the deputy; he was given no other choice.

Once the officers' suspicions about Mr. Louthan had been dispelled, he should have been free to go.

But the deputy did not let Mr. Louthan go. Instead, he told Mr. Louthan that he could not knock on his friend's mother's door, could not remain in the area, and could not walk away. RP 14-15, 25-26; CP 22.

At that point, Mr. Louthan was unlawfully seized. A reasonable person in his situation would not have felt free to go or to refuse the ride from the deputy. Indeed, he was given no choice but to get into the deputy's car.

The deputy testified that his concerns that Mr. Louthan had been doing anything illegal had been alleviated by the time the conversation turned to where Mr. Louthan was going to go next. RP 12. At that point, the officers' suspicions had been dispelled and Mr. Louthan had a constitutional right to knock on his friend's mother's or sister's door, to

remain in the area and continue to wait for his friend to drive by, or to walk down the highway. But the deputy explicitly prohibited him from doing any of those things. RP 14-15, 25-26; CP 22.

A person is seized under the Fourth Amendment and art. I, § 7 of the Washington Constitution when a reasonable person in his/her situation would not have felt free to leave. *State v. Kinzy*, 141 Wn.2d 373, 388, 5 P.3d 668 (2000), *as corrected* (Aug. 22, 2000) (*citing Florida v. Bostick*, 501 U.S. 429, 436, 111 S.Ct. 2382, 115 L.Ed.2d 389 (1991)); *Flores*, 186 Wn.2d at 512.

Pursuant to a *Terry* stop, the police may briefly detain a person based upon reasonable suspicion that criminal activity is afoot. *State v. Acrey*, 148 Wn.2d 738, 747, 64 P.3d 594 (2003). Once that suspicion has been dispelled, however, there is no justification for further detention and the officer(s) must permit the person to walk away and terminate the encounter. *Id.*; *Kinzy*, 141 Wn.2d at 390.

When a person has a constitutional right to walk away, but is not permitted to do so by the police, s/he is seized for constitutional purposes. *State v. Mendez*, 137 Wn.2d 208, 222, 970 P.2d 722 (1999), *abrogated on other grounds by Brendlin v. California*, 551 U.S. 249, 127 S.Ct. 2400, 168 L.Ed.2d 132 (2007) (a vehicle passenger was seized under art. I, § 7

when, as he attempted to walk away, an officer told him to get back into the car).

A person is can also be seized when the police merely ask him/her to wait. *State v. Barnes*, 96 Wn. App. 217, 223, 978 P.2d 1131 (1999) (pedestrian was seized when an officer approached him and asked him to wait while the officer ran a warrant check).

The presence of a second officer at the scene is another consideration that can serve to escalate police contact into a seizure. *Harrington*, 167 Wn.2d at 666.

The question of whether a reasonable person would have felt free to terminate an encounter with the police is analyzed in light of all of the objective circumstances. *Barnes*, 96 Wn. App. at 223.

Here, the officers seized Mr. Louthan when they gave him no option but to accept their “offer” of a “ride” in the patrol car. A reasonable person in Mr. Louthan’s situation, given the totality of the circumstances, would not have felt free to walk away. Indeed, the deputy explicitly told Mr. Louthan that walking away was “not an option.” RP 26; CP 22.

But, by the deputy’s own admission, there was no longer any suspicion that Mr. Louthan was engaging in illegal behavior by the time the issue of a “ride” came up. RP 12. Accordingly, the officers did not

have legal authority to seize Mr. Louthan and did so in violation of his constitutional rights. *Acrey*, 148 Wn.2d at 747.

The officers seized Mr. Louthan in violation of his rights under the Fourth Amendment and art. I, § 7. The drugs found pursuant to that unconstitutional seizure should have been suppressed. *Harrington*, 167 Wn.2d at 662. The trial court's suppression ruling must be reversed.

2. The officers' refusal to permit Mr. Louthan to leave cannot be justified under the "community caretaking" exception to the warrant requirement.

During their conversation, Mr. Louthan told the officers that he was diabetic and that he had not eaten in a long time or taken his insulin.² RP 20. When the officers asked Mr. Louthan if he needed an "aid car," however, he declined their offer. RP 14. There was no indication that Mr. Louthan was exhibiting any signs of physical distress or that he was experiencing some kind of medical emergency. *See* RP 4-32 *generally*.

At the suppression hearing, prosecutor relied, in part, on the idea that the officers had been exercising their "community caretaking" function in their interaction with Mr. Louthan, in order to prevent a medical emergency. RP 32.

² Although the interaction occurred in June, Mr. Louthan also mentioned to the officers that he was cold. RP 4, 20.

But there was no medical emergency. And while the officers may have been entitled to check on Mr. Louthan's wellbeing, they did not have the authority to force him to accept a ride to a gas station after he declined medical aid. Indeed, a ride to a gas station hardly qualifies as rendering emergency aid, even if such aid had been necessary. The officers' actions cannot be justified under the "community caretaking" exception to the warrant requirement.

The warrant requirement for searches and seizures does not apply when the police are operating under their "community caretaking" function, rather than investigating a crime. *Kinzy*, 141 Wn.2d at 385. The exception was originally announced in the context of police investigation and aid-rendering in after a car accident. *Id.* (citing *Cady v. Dombrowski*, 413 U.S. 433, 441, 454, 93 S.Ct. 2523, 37 L.Ed.2d 706 (1973); *State v. Houser*, 95 Wn.2d 143, 622 P.2d 1218 (1980)).

Subsequent cases have expanded the "community caretaking" police function to situations requiring other types emergency aid or checks on health and safety. *Kinzy*, 141 Wn.2d at 386–87 (citing *State v. Villarreal*, 97 Wn. App. 636, 984 P.2d 1064 (1999); *State v. Angelos*, 86 Wn. App. 253, 936 P.2d 52 (1997); *State v. Hutchison*, 56 Wn. App. 863, 785 P.2d 1154 (1990); *State v. Loewen*, 97 Wn.2d 562, 647 P.2d 489 (1982)).

In situations involving emergency aid, the police must actually be required to render such aid. *Id.* Emergency aid situations permit greater intrusion than routine health and safety checks, but also require greater urgency. *Id.* The emergency aid exception only applies if (1) the officer subjectively believed the person needed assistance for health or safety reasons; (2) a reasonable person in the same situation would have had the same belief; and (3) “there was a reasonable basis to associate the need for assistance with the place to be searched.” *Id.*

Appellate courts must apply the “community caretaking” exception cautiously “because of a real risk of abuse in allowing even well-intentioned stops to assist.” *Id.* at 388 (*citing State v. DeArman*, 54 Wn. App. 621, 626, 774 P.2d 1247 (1898); *State v. Gleason*, 70 Wn. App. 13, 17-18, 851 P.2d 731 (1993)). The officer’s investigation into a person’s need for assistance may only continue until the concerns regarding health and safety have been dispelled. *Id.*

The officers’ seizure and subsequent search of Mr. Louthan cannot be justified as either a health and safety check or as emergency aid.

If the purpose of the contact was a health and safety check, that purpose dissipated once Mr. Louthan told the deputy that he was “fine” and did not need them to call for medical assistance. RP 14. Once Mr. Louthan gave that response, the “check” was complete and the police

should have permitted him to terminate the encounter. *Kinzy*, 141 Wn.2d at 388.

Likewise, the seizure cannot be justified under the emergency aid exception because there was no emergency and the officers did not render any aid. First, the officers did not subjectively believe that Mr. Louthan required emergency aid. *Id.* at 386-87. If they had, they would have called for some kind of medical assistance, rather than offering to drive him to a gas station. Second, a reasonable person in the officers' situation would not have believed that Mr. Louthan needed emergency aid after he said that he was fine and declined the offer for an "aid car." *Id.* Finally, even if the officers had believed that Mr. Louthan needed help, requiring him to take a ride to a gas station and surrender to a full search of his pockets had no reasonable connection to any perceived medical emergency. *Id.*

The factors for determining whether the emergency aid exception applied to Mr. Louthan's case all weigh against the constitutionality of his seizure and subsequent search. *Id.* Indeed, the officers did not actually provide him with any emergency assistance – they merely forced him to take a ride to a gas station. The officers' actions do not fall under the emergency aid exception to the warrant requirement. The officers unconstitutionally seized Mr. Louthan when they prohibited him from

ending their encounter and gave him no choice but to ride in their patrol car to a gas station. *Kinzy*, 141 Wn.2d at 386–87.

The trial court erred by failing to suppress the drugs that were obtained through exploitation of Mr. Louthan’s unconstitutional seizure. *Harrington*, 167 Wn.2d at 669 (citing *State v. Soto-Garcia*, 68 Wn. App. 20, 841 P.2d 1271 (1992), *abrogated on other grounds by State v. Thorn*, 129 Wn.2d 347, 917 P.2d 108 (1996)). The trial court’s suppression ruling must be reversed. *Id.*

B. Even if Mr. Louthan was not unlawfully detained, the evidence must nonetheless be suppressed because the search of his pockets went beyond the scope of a protective weapons frisk.

Even if this court finds that Mr. Louthan was not unlawfully detained, the search of his pockets still violated his constitutional rights because it went beyond the scope of a protective weapons frisk.

When the police accept a community member into a patrol car – either as part of rendering emergency aid or in the process of conducting a criminal investigation – they may first conduct a frisk to ensure that s/he does not possess any weapons. *Loewen*, 97 Wn.2d at 566; *State v. Wheeler*, 108 Wn.2d 230, 235–36, 737 P.2d 1005 (1987). But the officers violate the state and federal constitutions by conducting a search beyond that which is “reasonably designed to discover guns, knives, clubs or other

hidden instruments for the assault of the police officer.” *Loewen*, 97 Wn.2d at 566.

In *Loewen*, for example, a police officer drove a car accident victim to the hospital in his patrol car. *Id.* First, however, he conducted a pat-down search of her person. *Id.* During that search, the officer felt an object in her pocket that was too small to be a weapon, pulled it out, and discovered it to be drug paraphernalia. *Id.* The Supreme Court ruled that the drug paraphernalia should have been suppressed because the search of the woman went beyond the scope of the weapons frisk necessary to protect the officers while transporting the woman to the hospital. *Id.* at 492-93.

Indeed, in *Wheeler*, the Supreme Court held that the police were justified in conducting only a weapons pat-down search when transporting a criminal suspect (who had not yet been arrested) in their patrol car. *Wheeler*, 108 Wn.2d at 235-36.

Similarly, here, the police may have been justified in patting Mr. Louthan down to ensure that he was not carrying a weapon before allowing him into the patrol car. But the search went far beyond the scope of a weapons frisk. Instead, the officers reached into Mr. Louthan’s pocket and pulled out a work glove before they found any contraband. RP 8; CP 23.

In the alternative, if this Court finds that Mr. Louthan was not unconstitutionally seized, the drug evidence must nonetheless be suppressed because the deputy's search of Mr. Louthan's pockets went beyond the scope of the weapons pat-down that would have been permissible as a condition of giving Mr. Louthan a ride to a gas station. *Loewen*, 97 Wn.2d at 566; *Wheeler*, 108 Wn.2d at 235–36. The trial court's order denying Mr. Louthan's motion to suppress must be reversed. *Id.*

CONCLUSION

The trial court erred by denying Mr. Louthan's motion to suppress the drugs discovered pursuant to his unlawful seizure and subsequent search. The court's ruling denying Mr. Louthan's motion to suppress must be reversed and his conviction must be vacated.

Respectfully submitted on November 21, 2017,



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CERTIFICATE OF SERVICE

I certify that on today's date:

I mailed a copy of Appellant's Opening Brief, postage prepaid, to:

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I filed the Appellant's Opening Brief electronically with the Court of Appeals, Division II, through the Court's online filing system.

I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

Signed at Seattle, Washington on November 21, 2017.



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