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Court of Appeals  
Division II  
State of Washington  
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NO. 50800-1-II

IN THE COURT OF APPEALS  
OF THE STATE OF WASHINGTON

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STATE OF WASHINGTON,  
Respondent,

v.

ROBERT ERNEST WILSON, JR.,  
Appellant.

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APPEAL FROM THE SUPERIOR COURT OF THE STATE  
OF WASHINGTON FOR GRAYS HARBOR COUNTY

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THE HONORABLE F. MARK MCCAULEY, JUDGE

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BRIEF OF RESPONDENT

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## RESPONSE TO ASSIGNMENTS OF ERROR

1. **The Appellant cannot seek review of the trial court's denial of his motions to dismiss pursuant to *Knapstad* and CrR 8.3(c).**
2. **Case law adds a condition of "reasonable necessity" to the statutory defense allowed by RCW 16.08.020.**
3. **The jury instructions given by the trial court allowed the Appellant to argue his theory of the case and were proper.**

## RESPONDENT'S COUNTER STATEMENT OF THE CASE

### Factual Summary

Delbert Frank lives SR 105 in Aberdeen and has a medium-sized mixed breed dog named "Dozer." RP 7-8. Frank described Dozer as a "[p]retty mild mannered dog, real easy going." RP 8. The Franks have a few acres of property and Dozer usually has the run of the neighborhood. RP 7-8.

The Grays Harbor Bowmen's club is located across the street from the Franks' residence. RP 15. All members of the club have a key to the gated property and the buildings. RP 40. The club has a 20 to 100 yard outdoor range. RP 40.

Club President Steve Love knew Dozer had been at the club on several previous occasions. RP 43. Love and Range Captain Scott Melton testified that Dozer had not been a problem with their dogs or any of the

other dogs present, and that Dozer was not aggressive with other dogs or people. RP 43-44, 53. Dozer was well behaved at the club and “a lot of the club members pet him and give him treats.” RP 53. However, Dozer had urinated on some expensive archery equipment. RP 44, 52-53. Because of this, and the danger of Dozer being hit on the busy road between his house and the club, Love had spoken with Franks about keeping Dozer at home, but Dozer wasn’t absolutely precluded from being at the club. RP 16, 44.

On May 14, 2017, Frank and his family were outside when he saw Dozer “take off up the driveway.” RP 9. Frank went inside to get shoes and a “quick drink” before leaving to retrieve the dog. RP 9. Before Frank could leave, Dozer returned with an arrow piercing his back end. RP 10. Dozer was in pain and whining. RP 10.

Dozer was “biting at the arrow” but continued to wag his tail. RP 11. Dozer couldn’t sit, walk, or run very well with the arrow through his hind end. PR 11. Any pressure on the arrow caused Dozer obvious discomfort and “he would try to nip at you and nip at the arrow...bark and whine, obviously cry.” RP 11-12.

Frank drove to the bow range and observed tire tracks and footprints that indicated someone had been there recently. RP 12. Frank is also a member of the bowmen’s club. RP 13, 15. No one was currently at

the club, and, based on the short time Dozer was gone, Frank estimated that the incident had happened very quickly. RP 12.

Frank, with veterinary advice, was able to remove the arrow. RP 13. The Franks kept Dozer comfortable for the night and took him to the vet the next morning. RP 13. Dozer required antibiotics and pain medicine and took about a week to return to normal activity. RP 14.

The Franks reported this incident to the Grays Harbor Sheriff's Office. Deputy Sean McKechnie responded to the Franks' residence. RP 20-21. Deputy McKechnie observed Dozer to be friendly, even though he could see an arrow going through the upper portion of his back, near the rear. RP 21-22.

The arrow had a field tip and was suited for target practice, as opposed to a broad head that would be used for hunting. RP 22. The arrow appeared to have gone over Dozer's spine and penetrated only the skin, missing any vital organs. RP 23.

Love and Melton reviewed surveillance video of the incident obtained from the Bowmen's Club. From this video, they identified the Appellant, a newer member of the club, as the perpetrator. RP 45, 54.

The video shows an older Ford pickup truck and a male around 40-50 years of age. Dozer can be seen chasing a small dog by the truck and the male chasing Dozer off. The

interaction between Dozer and the smaller dog is extremely brief. Dozer is seen running back towards the highway and away from the truck.

A minute goes by and the male grabs several arrows from the bed of his truck. The male is then seen nocking an arrow and pulling back the bow. Once the bow is fully drawn, Dozer can be seen re-entering the video and casually walking along the tree line, some distance from the truck. The male then releases an arrow and Dozer's rear end drops, consistent with him being hit. Dozer then runs off towards SR 105. The male quickly gathers his belongings and leaves.

Exhibit 2.

On May 15, 2017, Deputy McKechnie made contact with the Appellant, and he agreed to make a statement. RP 27. The Appellant admitted to being the only person present at the Bowmen's Club when Dozer came by on the 14<sup>th</sup>. Exhibit 8. The Appellant was there with his dog, Little Bit. Exhibit 8. The Appellant claimed that Dozer had grabbed his dog and shook him, although this cannot be seen in the video. Exhibit 2, 8.

The Appellant stated that when he approached Dozer, "the big dog ran off and was running around in a[n] open field by the clubhouse. As the dog was running around I knocked and arrow and took a shot at the dog." Exhibit 8. The Defendant stated he immediately felt remorse for shooting the dog. He then gathered his belongs and left. Exhibit 8.

Deputy McKechnie was able to see Little Bit on the 15<sup>th</sup> and he did not observe any injury on the dog. RP 33.

**Procedural History**

The Appellant was charged by Amended Information filed on July 17, 2017 with one count of Animal Cruelty in the First Degree. CP 24. Prior to trial, the Appellant made motions to dismiss the criminal charge against him pursuant to CrR 8.3(c). CP 6-8, 65-81. The first of these motions was found procedurally deficient and denied by the trial court. 7/6/17 RP 4. The renewed motion was denied, as there were material facts in dispute. 7/13/17 RP 7-8.

At trial, the Appellant asserted a defense pursuant to RCW 16.08.020 and proposed the following jury instruction:

It is a defense to a charge of Animal Cruelty that the dog was chasing, biting, injuring or killing any sheep, swine or other domestic animal, including poultry, belonging to such person, on any real property owned or leased by, or under the control of, such person.

The State has the burden of proving beyond a reasonable doubt that the force used by the defendant was not lawful. If you that the State has not proved the absence of this defense beyond a reasonable doubt, it will be your duty to return a verdict of not guilty.

CP 99-100; RP 75.

The State proposed a supplemental jury instruction to address the

proposed defense that read:

A person is not guilty of Animal Cruelty in the First Degree if the person's actions were in defense of himself or his property, and if such action was reasonable necessary.

CP 101.

The Court determined that a separate instruction on the proposed defense was confusing. RP 86-87. Instead, the Court determined that, in addition to the elements proposed by the State, the court would add subsection (2) in the elements instruction. RP 87. This added the element "That the Defendant's actions were not in defense of his dog, and were not reasonably necessary." CP 31.

The Appellant was convicted as charged on July 18, 2017. CP 34. He was sentenced to a standard range sentence on July 31, 2017. CP 37-47. He timely appeals. CP 48.

### ARGUMENT

**1. The Appellant cannot seek appellate review of the trial court's denial of his motion to dismiss pursuant to *Knapstad* and CrR 8.3(c).**

"A trial court may dismiss an information prior to trial when there are no material disputed facts and the undisputed facts do not establish a prima facie case of guilt against the defendant. *State v. Johnson*, 66 Wn.App. 297, 298, 831 P.2d 1137 (1992), citing *State v. Knapstad*, 107

Wn.2d 346, 356-57, 729 P. 2d 48 (1986). Since dismissal for factual insufficiency prior to a trial is an extreme measure, the Washington State Supreme Court has established a strict set of procedures that *must* be followed before such a pretrial dismissal is proper. *Knapstad*, 107 Wn.2d at 356.

A Washington defendant should initiate the motion by sworn affidavit, alleging there are no material disputed facts and the undisputed facts do not establish a prima facie case of guilt. The affidavit must necessarily contain with specificity all facts and law relied upon in justification of the dismissal. Unless specifically denied, the factual matters alleged in the motion are deemed admitted. The State can defeat the motion by filing an affidavit which specifically denies the material facts alleged in the defendant's affidavit. If material factual allegations in the motion are denied or disputed by the State, **denial of the motion to dismiss is mandatory**. If the State does not deny the undisputed facts or *allege other material facts*, the court is required to ascertain in the omnibus hearing whether the facts which the State relies upon, as a matter of law, establish a prima facie case of guilt.

*Knapstad*, 107 Wn.2d at 356-57 (Emphasis added).

This has been formalized by the enactment of CrR 8.3(c). The rule lays out the following procedure:

The defendant may, prior to trial, move to dismiss a criminal charge due to insufficient evidence establishing a prima facie case of the crime charged.

(1) The defendant's motion shall be in writing and supported by an affidavit or declaration alleging that there

are no material disputed facts and setting out the agreed facts, or by a stipulation to facts by both parties. The stipulation, affidavit or declaration may attach and incorporate police reports, witness statements or other material to be considered by the court when deciding the motion to dismiss. Any attached reports shall be redacted if required under the relevant court rules and statutes.

CrR 8.3(c).

A defendant has no right to appeal a denial of the motion to dismiss. RAP 2.2(a); *State v. Knapstad*, 107 Wash. 2d 346, 357, 729 P.2d 48, 55 (1986); *State v. Brown*, 64 Wash. App. 606, 612, 825 P.2d 350, 353 (1992). This issue is not properly before this court and should not be considered.

**2. Case law adds a condition of “reasonable necessity” to the statutory defense allowed by RCW 16.08.020.**

In order to prove Animal Cruelty in the First Degree, as charged in this case, the State was required to prove that the Appellant did unlawfully and intentionally: (a) Inflict substantial pain on an animal; or (b) Cause physical injury to an animal. CP 24, 31; RCW 16.52.205(1). The only material fact in dispute at trial was whether or not the Appellant’s actions were “authorized in law.”

As referenced above, the Appellant asserted a defense under RCW 16.08.020. This statute provides, in pertinent part:

It shall be lawful for any person who shall see any dog or dogs chasing, biting, injuring or killing any sheep, swine or other domestic animal, including poultry, belonging to such person, on any real property owned or leased by, or under the control of, such person, or on any public highway, to kill such dog or dogs...

Based on this, the Court added an additional element for the State to prove beyond a reasonable doubt that "...the Defendant's actions were not in defense of his dog, and were not reasonably necessary..." CP 31. The Appellant now asserts that "reasonable necessity" is not a requirement of RCW 16.08.020. Appellant's Brief at 28. However, this is incorrect.

What is now RCW 16.08.020 has been the law in Washington for over a hundred years. The original version allowed materially the same defense as the current statute: "It shall be lawful for any person who shall see any dog chasing, biting, injuring or killing any sheep, swine or other domestic animal, outside the enclosure of the owner or keeper of such dog, to kill such dog..." Rem. Comp. Stat. § 3107; *Drolet v. Armstrong*, 141 Wash. 654, 658, 252 P. 96, 97 (1927). However, the courts have tempered this defense with a requirement that the actions be reasonable.

In *State v. Burk*, the Defendant was convicted of unlawfully killing and possessing an elk. The Defendant killed the two elk and had their dead bodies in his possession, until he surrendered the same to the county game

officer. As a defense to such killing he sought to justify himself on the ground that the elk were, at the time of the killing, in the act of damaging and destroying his crops. The trial court excluded this defense. *State v. Burk*, 114 Wash. 370, 371, 195 P. 16, 16–17 (1921).

At trial, the Defendant made an offer of proof that tended to show the following:

That he owned a tract of land, which was grown to corn, potatoes, meadow, and other crops; that a band of eight elk had recently been in the habit of coming upon his premises and causing damage; that a short while before he shot any of the elk, he had on one night three times driven them from his premises; that on one occasion they had killed a valuable calf, and on another severely injured another calf; that the elk were in the habit of running through his cornfield and knocking down the corn and greatly damaging it; that about the time in question here, at 7 o'clock in the morning, he discovered this band of elk running through his cornfield and potato patch, knocking down and trampling upon his crops, and that while they were so doing he shot a male and female elk. He identified these two animals as being two of the herd of elk which had theretofore been on his place.

*State v. Burk*, 114 Wash. at 376–77.

The *Burk* court found excluding this evidence was error, and that “...generally speaking, it is a question of fact for the jury.” *Burk* at 377. The court held that the Defendant had a constitutional right to show, if he could, that it was **reasonably necessary** for him to kill these elk for the

protection of his property. *Burk* at 376 (emphasis added). “The reasonable necessity rule is the one which must control in a case of this character.”

*Burk* at 378.

In reaching this decision, the court discussed the purpose of the game law and the legislative intent.

The purpose of these laws is the protection of the game from destruction. The act must be reasonably construed to accomplish the purpose in view. It was not intended that one may not, in defense of his person, kill an elk or other protected animal, nor was it the intention to make it unlawful, under all circumstances, for one to protect his property against the acts of such animals by killing them. Viewing the statute in this light, it may be justly said that one who kills an elk in defense of himself or his property, if such killing was reasonably necessary for such purpose, is not guilty of violating the law.

*Burk* at 375–76.

In *Drolet*, the Washington State Supreme Court approved of the “reasonable necessity” language that was used in *Burk*. *Drolet* was a civil action brought to recover damages for the killing of two bird dogs. *Drolet v. Armstrong*, 141 Wash. 654, 654, 252 P. 96, 96 (1927). However, as referenced above, the *Drolet* court specifically referenced the statute that is now RCW 16.08.020.

Armstrong resided on a ranch two miles from the city of Yakima. He and his son killed two dogs that were actively attacking and killing

chickens on Armstrong's property. Armstrong testified that he had "no chance to catch them" and he didn't know who the dogs belonged to.

*Drolet v. Armstrong*, 141 Wash. 654, 654-55, 252 P. 96, 96-97 (1927).

The Court held that, "[u]nder well-considered cases and in all good reason, a person has a natural right to defend and protect his domestic fowls, and in doing so may kill dogs engaged in injuring and destroying them if there is reasonable and apparent necessity therefor, to be determined by the trier of the facts." *Drolet v. Armstrong*, 141 Wash. at 655-56.

The Court discussed that:

In *State v. Burk*, supra, there is a review of a number of authorities upon this question as it arose in both criminal cases and actions at law, where the animal killed while trespassing was either a domestic animal or one protected by the game laws of the state, which discuss the applicable rule and the reason for it. The sum total of those cases and others they in turn refer to is fairly expressed by a quotation in that case from 2 Cyc. 415, as follows:

'One may kill a vicious animal in the necessary defense of himself or the members of his household, or under circumstances which indicate danger that property will be injured or destroyed unless the aggressor is killed, but it seems that such killing is justified only when the animal is actually doing injury. \* \* \* Every person has a natural right to defend and protect his animate property-as cattle, stock, and fowls-from injury or destruction by dogs, and in pursuance of that object may kill dogs engaged in doing injury to such animals owned by him; but there must exist

an apparent necessity for such a course, and the destruction of the dog must be reasonably necessary under the circumstances. \* \* \* The right to kill dogs, in order to protect inanimate property, is based upon the same considerations.’

*Drolet* at 656–57.

In *Vander Houwen*, the owner of severely damaged orchards was convicted for shooting some of the responsible elk after repeated requests for state remedies were unsuccessful. *State v. Vander Houwen*, 163 Wash. 2d 25, 28, 177 P.3d 93, 94 (2008). The Supreme Court again affirmed that the rationale of *Burk* is the law in Washington.

In *Burk*, we held that landowners must be able to defend their property against destructive game. 114 Wash. at 376, 195 P. 16; *see also Cook v. State*, 192 Wash. 602, 611, 74 P.2d 199 (1937). In *Burk*, the court clearly stated, “it may be justly said that one who kills an elk in defense of himself or his property, if such killing was reasonably necessary for such purpose, is not guilty of violating the law.” 114 Wash. at 376, 195 P. 16. This holding illustrates more than a common law principle; rather it recognizes “a constitutional right to show, if he could, that it was reasonably necessary for him to kill these elk for the protection of his property.” *Id.* (emphasis added). We reaffirmed this constitutional right in *Cook*, holding that the Cooks would have been justified in killing animals that had damaged their property. *See* 192 Wash. at 611, 74 P.2d 199. Neither case has been overruled; thus the holding that one may reasonably defend property against wildlife damage is still correct law in Washington.

*State v. Vander Houwen*, 163 Wash. 2d 25, 33, 177 P.3d 93, 97 (2008).

The Court also affirmed that, “[a] property owner's right to protect his or her property from wild animals is not absolute and must be evaluated in context of other laws that apply to such animals and the reasonable legal alternative available to the property owner. *State v. Vander Houwen*, 163 Wash. 2d at 42.

The Appellant wants this court to disregard *Burk* and *Vander Houwen* “[b]ecause neither case involved a marauding dog or the terms of RCW 16.08.020.” Appellant’s Brief at 28. However, this misses the point. The courts have consistently affirmed a person’s right to protect property, whether poultry, an apple orchard, or a pet dog, but they have also required the person’s actions to be reasonable.

The *Drolet* case especially cannot be discounted because it specifically references the statutory defense at issue in this case. The Appellant presents that “[c]ourts cannot add language to a statute unless an addition is imperative to make the statute rational. *State v. Edwards*, 104 Wn.2d 63, 68, 701 P.2d 508 (1985).” Appellant’s Brief at 30.

In this case, the element of reasonableness did not originate with the trial court. Instead, it came directly from the higher courts’ requirement that a person’s actions be reasonable to comport with RCW 16.08.020. This requirement is necessary for the statute to make sense.

Without such a requirement, the statute would authorize a person to kill an animal at any time, in any place, and in any manner if it had ever posed a danger to that person's property. This does not make sense.

**3. The jury instructions given by the trial court allowed the Appellant to argue his theory of the case and were proper.**

The Appellant proposed four jury instructions. The first three dealt with a possible lesser included offense of Animal Cruelty in the Second Degree. The Court determined that the facts produced at trial did not support giving these instructions. RP 84. The Appellant did not take exception to these instructions being excluded. RP 89.

The fourth instruction is at issue in this appeal. The Appellant proposed an instruction that read:

It is a defense to a charge of Animal Cruelty that the dog was chasing, biting, injuring or killing any sheep, swine or other domestic animal, including poultry, belonging to such person, on any real property owned or leased by, or under the control of, such person.

The State has the burden of proving beyond a reasonable doubt that the force used by the defendant was not lawful. If you that the State has not proved the absence of this defense beyond a reasonable doubt, it will be your duty to return a verdict of not guilty.

CP 99-100. This instruction was based upon RCW 16.08.020.

Based on the analysis above, the trial court did not give the proposed defense instruction, but instead required the State to prove the Appellant was not acting reasonably in defense of his dog.

A challenged jury instruction is reviewed de novo. *State v. Pirtle*, 127 Wn.2d 628, 656, 904 P.2d 245 (1995). “Instructions must be read as a whole.” *State v. Kroll*, 87 Wn.2d 829, 843, 558 P.2d 173 (1976). The trial court has considerable discretion in deciding how many instructions to give. *State v. Markham*, 40 Wn.App. 75, 86, 697 P.2d 263, *review denied*, 104 Wn.2d 1003 (1985). The trial court also has considerable discretion in determining how jury instructions are worded. *State v. Krup*, 36 Wn.App. 454, 461-462, 676 P.2d 507, *review denied*, 101 Wn.2d 1008 (1984). Instructions are sufficient if they correctly state the law, are not misleading, and permit counsel to argue his or her theory of the case. *State v. Mark*, 94 Wn.2d 250, 526, 618 P.2d 73 (1980).

In this case, the trial court’s decision adopted the essence of the claimed defense. The trial court instructed that the Appellant could lawfully act in defense of his dog and that the State had to prove beyond a reasonable doubt that his actions were unlawful. CP 31. In fact, the Appellant was in a better position because the trial court eliminated the

State's ability to argue that the Appellant wasn't "on any real property owned or leased by, or under the control of, such person." CP 99.

The court also clearly found that a dog was a "domestic animal" because the jury was instructed that the Appellant could lawfully act in defense of his dog.

The instructions given in this case were not misleading, they correctly stated the law, and they allowed the Appellant to argue his theory of the case. In the end, the jury simply did not believe him.

### CONCLUSION

The trial court's instructions to the jury were proper and there was no error. As such, the verdict of the jury should be affirmed. If this court finds that the requirement of reasonableness was not authorized, the Appellant is, at best, entitled to a new trial with corrected instructions. Under no analysis is dismissal of the charge a proper remedy in this case.

DATED this 21<sup>st</sup> day of February, 2019.

Respectfully Submitted,

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# GRAYS HARBOR CO PROS OFC

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## Transmittal Information

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