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DIVISION II
OF THE STATE OF WASHINGTON

Larry Seaquist & Carla Seaquist, Appellants

v.

Michelle Caldier, Respondent

REPLY BRIEF OF APPELLANTS

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I. DEFENDANT'S MAIN RESPONSE CONTENTIONS

Defendant/Respondent Michelle Caldier makes the following arguments in response to this appeal:

1. What Caldier said as the basis of her Facebook opinion of stalking, and her other publications, was true, that Seaquist took a picture of her.
2. When she posted the Facebook comment, she believed it to be true.
3. Suits against politicians for campaign rhetoric are not actionable as more speech is the preferred remedy.
4. Seaquist failed to establish by clear and convincing evidence that Caldier acted with malice.
5. There is proof that people sympathetic to Seaquist drove by Caldier's house (email of Jeff Mitchell).
6. The created images of Seaquist were parody and caricature.
7. Caldier did not name Seaquist in her 10/10/14 radio broadcast, so her statements are not actionable.
8. The reference of misbehavior by "Seaquist campaign people" is not disparagement of Mr. Seaquist himself.
9. Seaquist has disavowed claims of defamation by implication, so his action for False Light must be dismissed.

We will address each of those positions. In addition, the response brief did not address the issue squarely raised that a publication must be judged by the four corners of the publication, the publication as a whole.

II. ARGUMENT AND AUTHORITIES

1. The defense misrepresents the evidence on which this suit is based.

A. Whether Seaquist took a photo of Caldier

The linchpin factual contention throughout defendant's response is that Larry Seaquist took photographs of Michelle Caldier. They make this statement early and throughout the brief. At page 1 of their brief: "A man in his seventies took pictures of a woman in her thirties without her knowledge or consent." While this was the position Caldier's campaign took, as the basis for a tactical campaign of disparagement, there is no basis in reality for this allegation. A simple examination of the actual photos taken¹ show this not to be true. Caldier cannot be identified in the photographs. They are not photographs of Michelle Caldier.

If summary judgment is to be granted against the Seaquists, no reasonable juror could find that these are not photographs of Michelle Caldier. Every reasonable juror would have to find that these are, indeed,

1. CP 699, 700, color photographs

photographs of Michelle Caldier.

Every one of the four publications alleged in the complaint states and relies on the false allegation that Seaquist took photos of Michelle Caldier. The defense brief relies extensively on this being an established fact², repeating the lie as if to make it so, when the only hard evidence of what is in the pictures, the photographs themselves, say otherwise. They are not photos of Caldier; she cannot be identified in the images. They are pictures of a car on a city street. That is the image intended by Seaquist, and it is the image he got. Seaquist has denied that he ever took any photograph of Michelle Caldier³, or directed others to do so.

B. Facebook Misquote

The defense misquotes Caldier's statement on Facebook at page 4, only partially quoting her comment. They quote⁴ "I felt like I was being stalked." It is understandable why the defense does not want the court to consider the entire statement, but the law requires the court to do so, and look

2. Defense brief at pages 1 (twice), 5 (twice), 6, 12, 13, 17, 18 (twice), 20 (twice), 21, 25, 27 (twice), 28, 33.

3. CP 687

4. While it is only part of the actual quote, the brief does not use an ellipsis (...) To indicate that it was truncated.

at the four corners of each publication⁵. The full quote, found at CP 708 is as follows:

“I came out of a candidate interview and saw Rep. Larry Seaquist, my opponent, taking pictures of me as I got into my car. Wow.... I felt like I was being stalked!” [emphasis added].

The problem is that Caldier not only claimed the basis for her feelings was that Seaquist took photos of herself, but that it occurred while she was getting into her car. She bases her opinion of stalking on that context, which is a lie. The actual photos show neither of these is true.

C. Claimed lack of knowledge of the content of the photos

The defense claims that when Caldier wrote in Facebook, she did not know what Seaquist photographed, when he took the photographs, or how many he took⁶. There is no support in the record for this allegation, as it is not in the declaration of Michelle Caldier⁷. The truth is that she knew from her own sight of a photograph being taken only once, as she testified by declaration that she saw Seaquist taking a photo in her rear view mirror, when she was already seated in the car. This was after she had retracted the

5. *Carey v. Hearst Publications, Inc.*, 19 Wn.2d 655, 143 P.2d 857 (1943)

6. Defense brief, page 1, 20.

7. CP 77-90

convertible roof, which takes 20 seconds to complete⁸. She never claimed to have seen him taking pictures when she was getting into her car, so her statement that he did so was without factual basis.

This appears to be justification drift: after-the-fact rationalization of the defamatory statements made. If there is an allegation that Seaquist took additional photos while she was getting into her car, such would be made with reckless disregard of the truth at best, and a knowing falsehood at worst. “Every unqualified statement of that which one does not know to be true is equivalent to a statement of that which he or she knows to be false.” RCW 9A.72.080.

D. Actual knowledge of falsehood after 9/12/14.

The defense position⁹ that she did not really know what photos were taken when she saw him taking a photo, so she therefore putatively believed her statement to be true is completely untenable after she saw Seaquists’ actual photo in the September 12, 2014 Gardner blog¹⁰ which she acknowledged she saw. She admitted she saw the actual photo in the Gardner

8. CP 688-689.

9. Defense Brief, page 1, 20

10. CP 106-115, CP 721-725, color exhibits

Blog, the online Kitsap Sun article¹¹.

The most extreme defamation occurred after that date. The 30 second youtube video which was also broadcast over the airwaves was published starting October 8, 2014¹². The radio broadcast complaining about harassment and having her opponent taking pictures of her occurred on October 10, 2014¹³. The campaign brochure with the “witches brew” of allegations, including that Seaquist took photos of Michelle Caldier, with false and misleading illustrations of what he did, Seaquist campaign people taking pictures of Caldier home, mail tampering, shaming Seaquist, and with Caldier’s expression of feelings in her own home, as a female, came out thereafter, on or about October 16, 2014¹⁴, and had been in planning since at least September 15, 2014¹⁵. When these three final publications were made, there was no basis at all to claim the photo he took was of her, or of her while she was getting into her car. When these final three publications were made, there is clear and convincing evidence that she knew, conclusively, that they

11. CP 641-642, answer to interrogatory 36.

12. CP 79.

13. CP 79, 88, 89.

14. CP 79, 93, 94.

15. CP 553.

were not true.

E. Motivation to file police report

The defense claims that the recounting of the mailbox allegation “recites the concerning events that led Ms. Caldier to file the police report¹⁶. If that is so, why is the mail tampering not even mentioned in the police report¹⁷? The campaign brochure itself states that “Michelle filed a police report to communicate a message to Larry Seaquist and his campaign staff that they had crossed the line.¹⁸” The police report also shows that motivation to be false, as she states in the report itself¹⁹ that she did not want Seaquist contacted. The real motivation was to have a prop for the mailer²⁰, where it is prominently displayed²¹.

2. Viability of defamation actions in political races.

The defense posits that in political races, the best remedy for bad

16. Defense Brief, page 30.

17. CP 83-85.

18. CP 94.

19. CP 84.

20. CP 574.

21. CP 94.

speech is more speech, citing *Rickert v. PDC*²². In fact, the case stands for the opposite. In *Rickert*, a candidate was being disciplined by the Public Disclosure Commission, a state agency, for false statements in a political campaign. The Supreme Court disapproved of the statute under which the PDC was operating, as too invasive of political speech, but actually endorsed the defamation action remedy for a political candidate to seek remedy for bad speech. The court stated at page 856:

Were there injury to Senator Sheldon's reputation, compensation would be available through a defamation action.

This is precisely the case before the court now. There has been damage to Mr. Seaquist's reputation, and the law allows a remedy. More speech may be a remedy, but it is not the only remedy. When the opponent has a budget of \$256,764.59²³, more speech is just screaming into a windstorm, and not an effective remedy.

3. The Actual Malice Standard

Defendant misquotes the plaintiff's burden²⁴, stating that the Seaquists must show that Caldier actually entertained serious doubts about the truth of

22. 161 Wn.2d 843, 169 P.3d 826 (2007)

23. CP 665.

24. Defendant's brief, page 15.

her statements, citing *Moe v. Wise*²⁵. The case does not so hold. It also allowed that it must be shown that the speaker was acting with a high degree of awareness of its probable falsity, which is just another statement of the burden of proving either knowledge of falsity, or reckless indifference to the truth, contemplated by *N.Y. Times Co. v. Sullivan*²⁶, and *Gertz v. Robert Welch, Inc.*²⁷. As we have established, there is ample clear and convincing evidence to support such a finding, both direct and circumstantial.

4. Parody and Caricature

Defendant suggests that her images of Seaquist leaning into the car to get a close up view and hunkered over with an intent look on his face were parody or caricature. The significance of parody and caricature are that they are not taken seriously as a statement of defamatory fact by the readers as they are known to be comical or satirical exaggerations²⁸.

While Caldier's campaign manager was initially considering a jib jab, or exaggerated caricature²⁹ of plaintiff Seaquist, that decision was dropped,

25. 97 Wn.App. 950, 989 P.2d 1148 (1999).

26. 376 U.S. 254, 279-80, 84 S. Ct. 710, 11 L. Ed. 2d 686 (1964).

27. 418 U.S. 323, 94 S. Ct. 2997, 41 L. Ed. 2d 789 (1974).

28. *Hustler Magazine, Inc. v. Falwell* 485 U.S. 46, 108 S.Ct. 876, 99 L.Ed.2d 41 (1985).

29. See, e.g. CP 570, 572, 576.

and he went for a more serious effect³⁰ A look at the actual images created³¹ show no humor, and instead a recreation of events which never occurred. Examining the photos in context with the language used on the campaign mailer³², as required by *Carey v. Hearst Publications, Inc.*³³, no one would mistake this for humor or satire. Defendants brief actually call these images “recreations³⁴,” which we agree they are. In combination with the language surrounding them, the recreations reinforce the false allegation that this is behavior in which Larry Seaquist engaged. The recreation is of events which never occurred. The image of Seaquist leaning into the window of Caldier’s car for a closer look shows aggressive behavior, harassment, stalking and confrontation, matching her false harassment and stalking theme.

While the Campaign manager Chuck Adams initially wanted Seaquist to look more animated, in the pieces, his intent was not parody. His intent is made plain in his deposition³⁵:

30. CP 540, Deposition of Chuck Adams, page 117.

31. CP 721,715, color exhibits.

32. CP 93, 94, color exhibits.

33. 19 Wn.2d 655, 143 P.2d 857 (1943).

34. Defense brief, page 24.

35. CP 540.

- Q: A follow-up question on the photograph. On the photograph you actually used, it's not jib jabbish?
- A. Some are and some aren't.
- Q. Well, this one on Exhibit 6, the Photogate piece, it's not jib jabbish, agreed?
- A. It's more what I would call neutral.
- Q. And you had requested that she make him, find an image where he's more animated?
- A. Correct. And that can mean, you know, more in action or doing something as opposed to, you know, just a photo.
- Q. Well, you explained earlier that because he's an older man taking a picture of a younger woman, that you implied some kind of intent. I don't remember your exact words.
- A. It had more to do with intimidation. It had nothing to do with anything else. That would have more felt like an intimidating a senior person overlooking a younger person and using their stature for intimidation purposes. That was my comment there.
- Q. And is that what you were after when you wanted his picture to be more animated?
- A. Yes.
- Q. Now, it appears that to create an image that where Larry looks animated, they had him hunched over? What I call--
- A. I don't understand. I don't know why she did what she did exactly. I reviewed it and approved it. It was not my direction.
- Q. Was it animated as you wished it to be?
- A. It worked. It's -- I was happy with the result.

This makes clear that the actual, final publication was not meant to be parody, humor, or caricature. The campaign was not going for accuracy. They were going for creepy, and obtained it. They got the disparagement they wanted.

5. Defendant claims vagueness as to the Radio attribution to plaintiff

Respondent Caldier argues³⁶ that she never named Seaquist in the 10/10/14 radio broadcast³⁷ as the harasser, so she did not disparage him. She does, however refer to Seaquist as her opponent, and he was her only opponent. There is no ambiguity here.

6. Caldier attributes control of “Seaquist campaign people” to Seaquist.

Defendant claims that complaining about behavior of “Seaquist campaign people³⁸” is not disparaging of Seaquist himself. She claims that it encompasses others supporting him. However, by the four corners rule, in which, in the same document, she claims Seaquist should be ashamed and that she wanted “to send a message to Larry Seaquist and his campaign staff that they had crossed the line³⁹” The defense claims that they do not “accuse Mr. Seaquist of directing, controlling, or ratifying behavior of ‘campaign people,’” but the document itself says otherwise.

Defendant offers as proof a hearsay email from a member of the public⁴⁰, stating that he drove by her house and is skeptical of her residence.

36. Defense Brief, page 27.

37. CP 89.

38. Defense Brief, page 29.

39. CP 94.

40. Email purporting to be from a Jeff Mitchell, CP774-781.

Summary judgment is limited to admissible evidence. CR 56 requires affidavits to support the motion. There is no hearsay exception which makes this email admissible. A trial court may not consider inadmissible evidence, including hearsay, when ruling on a summary judgment motion. *Dunlap v. Wayne*⁴¹, *Ebel v. Fairwood Park II Homeowners' Ass'n*⁴². The same rule should apply in Appellate court, when considering the motion de novo. The document should be stricken and not considered in this appeal.

7. Every opinion either omitted contrary facts or implied damning facts

The defense brief does not address the omission of contradictory facts. Caldier knew that the person who took photos of her home claimed to be a real estate appraiser⁴³, but she did not have enough room on the mailer to tell the people about that explanation⁴⁴. Omissions from the facts create a jury issue, even as to statements of opinion⁴⁵.

Even if a speaker states the facts on which an opinion is based, if

41. 105 Wash.2d 529, 535, 716 P.2d 842 (1986).

42. 136 Wn. App. 787, 790, 150 P.3d 1163, 1165 (2007).

43. CP 520, Caldier Deposition, pages 69-71.

44. CP 530, Caldier Deposition, page 71.

45. *Milkovich v. Lorain Journal*, 497 U.S. 1, at 18-19, 110 S. Ct. 2695, 111 L. Ed. 2d 1 (1990).

those facts are either incorrect or incomplete, or the speaker's assessment of the facts is erroneous, the statement may still imply a false assertion of fact. The mere fact that a speaker discloses a basis for a false charge made about another does not protect the speaker from liability for defamation if the opinion itself is based on false and defamatory facts⁴⁶ This is the case here. The false and defamatory facts relied on by Caldier to support her opinions are a question for the jury, so summary judgment was inappropriate.

8. False Light claim is preserved.

Defendant complains that as plaintiffs disavowed reliance on defamation by implication, plaintiffs also waived their False Light Claim. There is no support for this argument. Defendant confuses the separate nature of the causes of action. This is best illustrated by *Corey v. Pierce County*⁴⁷, in which separate causes of action were brought: defamation, defamation by implication, and false light, and others not here pertinent. She was able to recover on both False light and Defamation.

We agree that Seaquist never relied on defamation by implication, and expressly so stated. There was never discussion of the False Light claim. Defamation and False Light seek redress for separate wrongs. Defamation is to recover for damage to reputation. False Light is to recover for violation

46. *Duc Tan v. Le*, 177 Wn.2d 649, 300 P.3d 356 (2013).

47. 154 Wn.App. 752, 225 P.3d 367 (2010).

of privacy and mental suffering^{48, 49}. In *Brink, infra*, the jury returned a verdict on both, and the court discussed the duplication of damages, allowing recovery on only one theory, as mental suffering is also recoverable in defamation. The significance for our issue is that they state different causes of action.

A false light claim arises when someone publicizes a matter that places another in a false light if (a) the false light would be highly offensive to a reasonable person, and (b) the actor knew of, or recklessly disregarded, the falsity of the publication and the false light in which the other would be placed⁵⁰. A plaintiff need not be defamed to state a false light claim⁵¹.

Seaquist should not be prohibited to pursue his false light claim because he waived defamation by implication claims, on which he never relied.

9. Four corners rule

Defendant's brief, like the court below, also did not address the four corners rule: that the publication must be viewed as a whole, by the four

48. *Brink v. Griffith*, 65 Wn.2d 253, 396 P.2d 793. (1964).

49. *Eastwood v. Cascade Broadcasting Co.* 106 Wash.2d 466, 722 P.2d 1295 (1986).

50. *Corey v. Pierce County*, 154 Wn.App 752,225 P.3d 367 (2010).

51. *Eastwood v. Cascade Broadcasting, Co.* 106 Wn.2d 466, 722 P.2d 1295 (1986)

corners of the publication⁵², in a manner it would ordinarily be viewed by its readers⁵³.

As stated in *Chapin v. Knight Ridder, Inc.*⁵⁴:

...we would err if we did not consider the article as a whole. A magnifying glass is no aid to appreciating a Seurat, and the pattern of a complex structure is often discernable only at some distance

Each of these publications is damning, particularly when viewed as a whole, but particularly the campaign brochure⁵⁵. Defendant would like us to see each fragment in isolation, but that is not the manner in which her statements are to be viewed.

10. Defendant's publications enjoy no First Amendment protection.

While First Amendment analysis is appropriate as to information and disinformation pushed out by a political campaign, after that analysis is finished, there is no shelter in the First Amendment for such defamation.

As the United States Supreme Court enunciated⁵⁶:

The use of calculated falsehood, however, would put a

52. *Carey v. Hearst Publications, Inc.*, 19 Wn.2d 655, 143 P.2d 857 (1943).

53. *Purvis v. Bremer's Inc.*, 54 Wn.2d 743, 751, 344 P.2d 705 (1959),
Amsbury v. Cowles Pub. Co., 76 Wn.2d 733, 738, 458 P.2d 882, 885 (1969).

54. 993 F.2d 1087, at 1098 (4th Cir. 1993).

55. CP 93, 94

56. *Garrison v. State of La.*, 379 U.S. 64, 75, 85 S. Ct. 209, 216, 13 L. Ed. 2d 125 (1964)

different cast on the constitutional question. Although honest utterance, even if inaccurate, may further the fruitful exercise of the right of free speech, it does not follow that the lie, knowingly and deliberately published about a public official, should enjoy a like immunity. At the time the First Amendment was adopted, as today, there were those unscrupulous enough and skillful enough to use the deliberate or reckless falsehood as an effective political tool to unseat the public servant or even topple an administration. [citation omitted]. That speech is used as a tool for political ends does not automatically bring it under the protective mantle of the Constitution. For the use of the known lie as a tool is at once at odds with the premises of democratic government and with the orderly manner in which economic, social, or political change is to be effected. Calculated falsehood falls into that class of utterances which 'are no essential part of any exposition of ideas, and are of such slight social value as a step to truth that any benefit that may be derived from them is clearly outweighed by the social interest in order and morality. [Citation omitted]. Hence the knowingly false statement and the false statement made with reckless disregard of the truth, do not enjoy constitutional protection.

Plaintiff/Appellant Seaquist has demonstrated that Defendant/Respondent Caldier used a series of lies, attributing to him harassment and stalking behaviors which could only be done with reckless disregard of the truth and knowingly ignoring contrary evidence. She enjoys no constitutional protection for this behavior.

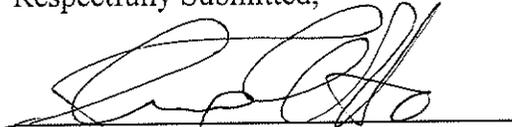
III. CONCLUSION

This was plain disparagement and false light, without truth behind it, which has no first amendment protection, and for which there must be a remedy. As there are a multitude of factual questions for a jury to decide,

dismissal on summary judgment was error. We request the court reverse the trial court below, and remand for trial of these issues.

DATED THIS 22nd day of March, 2018.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Anthony C. Otto', written over a horizontal line.

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COURT OF APPEALS
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LARRY SEAQUIST AND CARLA SEAQUIST,,

Plaintiffs/Petitioners,

vs.

MICHELLE CALDIER, a single person,

Defendant/Respondent.

CASE NO. 50816-8-II

DECLARATION OF SERVICE

I, Karen Alfano, declare under penalty of perjury under the laws of the State of Washington, that on this day I sent by electronic mail a true copy of a Reply Brief of Appellants addressed to:

David P. Horton, Attorney at Law
dhorton@thwpllc.com

Signed on this 22nd day of March, 2018, at Port Orchard, Kitsap County, Washington.


Karen Alfano

LAW OFFICES OF ANTHONY C. OTTO

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