

FILED  
Court of Appeals  
Division II  
State of Washington  
5/11/2018 4:22 PM

No. 50930-0-II

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

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STATE OF WASHINGTON,

Respondent,

v.

VICTOR BUENO,

Appellant.

---

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

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APPELLANT'S OPENING BRIEF

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A. SUMMARY OF APPEAL

The trial court abused its discretion in admitting the contents of a letter Victor Bueno allegedly sent to his ex-wife in violation of a no-contact order. The statements in the letter were hearsay because they were offered by the State to prove Bueno wrote the letter and were relevant for that purpose only if they were true. Contrary to the trial court's ruling, they did not fall under the hearsay exception for statements of identification.

Also, the State did not prove beyond a reasonable doubt that Bueno violated the no-contact order because it did not prove he wrote the letter.

B. ASSIGNMENTS OF ERROR

1. The trial court abused its discretion in admitting evidence under ER 801(d)(1)(iii), the hearsay exception for statements of identification.

2. The State did not prove the elements of the crime beyond a reasonable doubt, in violation of due process.

C. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR

1. An out-of-court statement is hearsay if it is offered for the truth of the matter asserted. Here, the State offered the contents of a

letter to prove Bueno wrote the letter. The statements were relevant for that purpose only if they were true. Were the statements hearsay?

2. An otherwise inadmissible hearsay statement is admissible as a statement of identification under ER 801(d)(1)(iii) if it is made by a witness identifying a person “after perceiving the person.” Here, the statements in the letter were not made by a witness identifying a person “after perceiving the person.” Instead, they merely tended to connect Bueno to the crime. Did the trial court abuse its discretion in admitting the contents of the letter under this hearsay exception?

3. To prove the crime of violation of a no-contact order, the State was required to prove beyond a reasonable doubt that Bueno wrote the letter. Did the State fail to meet this burden where the evidence showed Bueno was unable to read and write in English?

#### D. STATEMENT OF THE CASE

Victor Bueno and Mardi Jo Harris were married for 16 years. They lived with Harris’s son Jordan in a house in Bremerton. The couple separated in 2015 and divorced in 2016. RP 422-23, 440.

In November 2015, a two-year no-contact order was entered prohibiting Bueno from contacting Harris. CP 5. Bueno acknowledged receiving notice of the order. RP 354-56, 371.

On March 30, 2017, Harris received an envelope in the mail containing a card and a letter inside. She believed Bueno had sent the letter and notified the police. RP 399-401, 406-08, 428-29; Exhibit 5A.

The State charged Bueno with one count of felony violation of a court order.<sup>1</sup> CP 1-2.

Bueno testified he did not send the letter and did not know who did. RP 463, 502. He could not have sent the letter because he does not know how to read or write in English. RP 462-64. He was born in Cuba, where he learned how to read and write in Spanish. RP 464, 498. He never received any formal education in the English language. RP 462-63. While he and Harris were married, she would assist him when he needed to communicate with someone in English, such as at medical appointments or when dealing with social security. Harris would fill out the forms and speak to the individuals. RP 463-64. Bueno has never written a letter to Harris. RP 464.

Bueno was assisted by a Spanish-language interpreter throughout the proceedings. E.g., RP 2, 3. His testimony was translated into English for the jury. RP 462.

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<sup>1</sup> The State alleged Bueno had two prior convictions for violating the provisions of a court order. CP 1-2. At trial, Bueno stipulated to the two prior convictions. CP 23-26; RP 372.

To help prove Bueno wrote the letter, the State moved to admit the contents of the letter, arguing several statements of fact could be connected to Bueno's own circumstances and experiences. The State explained, "The contents of the letter itself are the most important part of the State's case, as the contents in context prove that it was, in fact, the defendant who wrote this letter." RP 32.

Defense counsel objected to admission of the contents of the letter as hearsay. Counsel pointed out that most of the statements could not be connected to Bueno unless they were actually true. Therefore, they were being offered for the truth of the matters asserted and were hearsay. RP 384-87.

The trial court overruled the objection. The court reasoned that the contents of the letter were not being offered for the truth of the matters asserted because they were offered for the purpose of "identification." RP 387.

The court ordered portions of the letter redacted because they were inflammatory, not because they were hearsay. RP 39-49; Exhibit 5A. At trial, Harris read the redacted contents of the letter aloud to the jury as follows:

Ola Mama, how are you doing? I'm trying to pick up my stuff, but I have to talk to you first before I

get it because I don't want to make a mistake. I don't want to hurt you like you do to me.

You know you call, lie to me, tell me to come home. And you lied and called the police on me. Five cop cars, police in the terminal ferry in Bremerton, and put guns in my face and put me on the floor. You're the one who put me in jail.

The pastor for the church and your family speak to me and they told me not to do that. God love me. God bless me every day, and God be there for me, and God make me forget you and my son.

Thank you so much for everything you have done to me because you know I have been there for my son for 15 years. When you been work, I've been here my son every day. I do – I don't go nowhere. I give to you free to go everywhere while I'm in the house with my son.

You listen to too many people. You know when I first met you exactly what I'm doing. There was nothing new to you. I see you're an evil woman. You want everything for you. All I want is my stuff, my black jacket, my shoes, my clothes, my cell phone, because the police never give it to me.

Please, I need the phone because contacts, addresses for my family in Cuba is in the phone. Do you want money? Do you want some money for the phone? Let me know.

I have a big medical problem. I'm not asking for you to be there for me because everything is over. I have a big cash coming. The company want more to make a deal with me because it's too much money.

I put a lawsuit about what happened on the night the police came to the house. I never take anything. The video camera he show put my cell phone in my pocket, then the lady find out the electronic device for my car because the lady that found it has it so I can't get it back.

So that's why I say have no charger. I have a lawyer, John Mellow and Taniece Johnson, that's my lawyers. I have to go to Olympia and sign the paper so the money can go to the Bank of America in Seattle. I

was in Bremerton for four days four blocks from your house.

I was staying in Paula house. I need you or my son to call me right away because I don't have too much life and I'm about to die because I have cancer and doctor said he can't do nothing because the cancer is too big.

No matter what happened, I want you to have a wonderful life with any man you want. And I miss my son so very much. And tell him God bless you. God is good. God is gonna be here for me. I love you. Call me.

RP 434-36. Written at the bottom of the letter was a telephone number.

The letter was signed "Papi." RP 436.

The State questioned Harris in detail about the statements in the letter, attempting to link them to Bueno. The prosecutor elicited that Harris indeed had some of Bueno's belongings, including his clothing and a cell phone he had used, as stated in the letter. RP 438, 441. Harris had called the police on Bueno, as stated in the letter. RP 439. Jordan had lived with them while they were married and Bueno thought of him as a son, as stated in the letter. RP 439. Bueno still had family in Cuba, as stated in the letter. RP 441. Harris did not know "Paula" but she remembered Bueno talking about her. RP 441. Bueno had a "multitude" of health issues, consistent with the statements in the letter. RP 443.

The police never tried to obtain fingerprints or DNA evidence from the card or the letter in an effort to prove they came from Bueno. RP 416-17. The State conducted no handwriting analysis. RP 417-18.

The jury found Bueno guilty as charged. CP 44-45.

E. ARGUMENT

**1. The trial court abused its discretion in admitting the contents of the letter under the hearsay exception for statements of identification.**

- a. The statements of fact contained in the letter were inadmissible hearsay unless they fell under an exception to the hearsay rule.

The statements of fact contained in the letter that were offered to prove Bueno wrote the letter were offered to prove the truth of the matters asserted. Therefore, they were inadmissible hearsay unless they fell under an exception to the hearsay rule.

“Hearsay” is “a statement, other than one made by the declarant while testifying at the trial or hearing, offered in evidence to prove the truth of the matter asserted.” ER 801(c). Under the hearsay rule, “[h]earsay is not admissible except as provided by these rules, by other court rules, or by statute.” ER 802.

The statements of fact contained in the letter would not be relevant to prove Bueno wrote the letter unless they were actually true.

For example, the statement, “you lied and called the police on me,” was not relevant to show Bueno wrote the letter unless it was true that Harris had called the police on him. That is why the State elicited from Harris that she had called the police. RP 439. The State could not link this statement to Bueno unless the event had actually occurred.

Likewise, the statements, “I’m trying to pick up my stuff,” and, “All I want is my stuff, my black jacket, my shoes, my clothes, my cell phone,” were relevant only if it was true that Harris indeed had some of Bueno’s belongings. Thus, the State elicited from Harris that she did have some of Bueno’s belongings, including his clothing and a cell phone he had used. RP 438, 441. Again, the State could not link this statement to Bueno unless it was actually true.

Most of the statements in the letter were relevant to show that Bueno wrote the letter only if they were true. Thus, they were offered for the truth of the matters asserted and were inadmissible unless they fell under an exception to the hearsay rule. ER 801(c); ER 802.

- b. The statements in the letter did not fall under the hearsay exception for statements of identification, contrary to the trial court’s ruling.

The trial court ruled that the contents of the letter were admissible because they were not offered for the truth of the matters

asserted but were offered for the purpose of “identification.” RP 387. This ruling was erroneous for two reasons. First, as shown above, the statements *were* offered for the truth of the matters asserted. Second, they did not fall under the hearsay exception for statements of identification.

This Court reviews a trial court’s decision to admit or exclude evidence for abuse of discretion. State v. Kinard, 109 Wn. App. 428, 435, 36 P.3d 573 (2001). A court abuses its discretion if it fails to abide by an evidence rule’s requirements. State v. Fisher, 165 Wn.2d 727, 745, 202 P.3d 937 (2009). A court’s interpretation of an evidence rule is reviewed *de novo* as a matter of law. Id.

Under the hearsay exception for statements of identification, an out-of-court statement by a “witness” is not hearsay if it is “one of identification of a person made after perceiving the person.” ER 801(d)(1)(iii).

The rule “excepts from hearsay treatment any statement identifying an accused made by a perceiving witness who testifies at trial and is subject to cross examination.” State v. Grover, 55 Wn. App. 252, 256, 777 P.2d 22 (1989). The rule allows as substantive evidence an out-of-court statement identifying a person, whether the statement is

made directly to the police at the scene, or during a line-up or photographic montage or other similar identification procedure. Id.

The rule does *not* allow “out-of-court statements that arguably identify a person (typically the defendant in a criminal case) but that really describe facts that occurred in the past and implicate the defendant in the crime charged.” 5B Karl B. Tegland, Washington Law and Practice: Evidence Practice § 801.29 (6th ed. 2017). Such an application of the rule “erroneously ignore[s] the purpose and language of the rule.” 2 McCormick on Evidence § 251 (7th ed. 2016).

The purpose of ER 801(d)(1)(iii) is to allow out-of-court identifications as substantive evidence because they are preferable to in-court identifications. United States v. Kaquatosh, 242 F. Supp. 2d 562, 565-67 (E.D. Wis. 2003).<sup>2</sup> First, courtroom identifications are thought to be less convincing than prior, out-of-court identifications made when a witness’s memory is fresher and the conditions less suggestive. Id. Thus, corroboration with the earlier identification is permitted. Id. Second, the rule was designed to address the situation

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<sup>2</sup> Washington’s ER 801(d)(1)(iii) is the same as FRE 801(d)(1)(C). Tegland, Washington Practice: Evidence Law and Practice, *supra*, at § 801.1, n.1. Thus, federal case law interpreting FRE 801(d)(1)(C) is persuasive authority in interpreting Washington’s rule. In re Det. of Pouncy, 168 Wn.2d 382, 392 n.9, 229 P.3d 678 (2010).

where a witness cannot make an in-court identification due to memory lapse or recantation. Id. In that situation, evidence of an earlier identification is admissible so long as the witness is available and subject to cross-examination at trial. Id.

Consistent with this purpose, the plain language of ER 801(d)(1)(iii) allows only prior statements of “identification.” The legislative history of the rule makes clear that it “is intended to apply to out-of-court identification procedures such as line-ups, show-ups and displays of photographs” which themselves must comport with the standards of due process. State v. Shaw, 2005 SD 105, 705 N.W.2d 620, 628 (S.D. 2005).

Moreover, the out-of-court statement must be made by the witness “after perceiving the person.” ER 801(d)(1)(iii). The purpose of this requirement is to “permit evidence of an identification made after recognizing the assailant on subsequent observation.” Kaquatosh, 242 F. Supp. 2d at 565 (internal quotation marks and citation omitted).

Washington cases applying ER 801(d)(1)(iii) generally comply with these requirements. An out-of-court identification has been held admissible under the rule only where the witness identified the accused or his likeness in a line-up, show-up, photo montage or similar

procedure, or directly to a police officer at the scene. See State v. Stratton, 139 Wn. App. 511, 514, 161 P.3d 448 (2007) (statements of identification made by witnesses after viewing suspects in show-up and photomontage); Grover, 55 Wn. App. at 256 (statement of identification made by witness to police detective at scene of crime); State v. Jenkins, 53 Wn. App. 228, 230, 766 P.2d 499 (1989) (statement of identification made by witness after viewing suspect in photo montage).

Thus, the rule is limited to statements of “identification” made by a witness “after perceiving the person.” ER 801(d)(1)(iii). It does not apply to other kinds of out-of-court statements, even those that connect the accused to the crime in a case where identity is at issue. The rule does not allow testimony “that a certain person, known to the witness, committed a crime.” McCormick on Evidence, *supra*, at § 251. It is also not a proper way to introduce “detailed accounts of the actual crime.” Randolph v. United States, 882 A.2d 210, 220 (D.C. 2005).

Applying these principles here, it is apparent the contents of the letter were not admissible under the hearsay exception for statements of identification. None of the statements was made by a witness

identifying a person “after perceiving the person.” ER 801(d)(1)(iii). Instead, the statements were allegedly made by Bueno himself. They were admitted only because they tended to connect him to the crime. The trial court abused its discretion in admitting the statements under the hearsay exception for statements of identification.

c. The conviction must be reversed.

Evidentiary errors require reversal if, “within reasonable probabilities, the outcome of the trial would have been materially affected had the error not occurred.” State v. Thomas, 35 Wn. App. 598, 609, 668 P.2d 1294 (1983).

It is reasonably probable the outcome of the trial would have been different in the absence of the erroneously admitted evidence. The State’s case relied heavily upon the statements in the letter. As the deputy prosecutor explained to the court, “The contents of the letter itself are the most important part of the State’s case, as the contents in context prove that it was, in fact, the defendant who wrote this letter.” RP 32.

Without the statements contained in the letter, the evidence connecting Bueno to the letter was much less convincing. Harris thought the handwriting looked like Bueno’s and the tone sounded like

him. RP 437, 443. But the police never obtained a handwriting sample from Bueno and made no handwriting comparison. RP 417-18.

Harris said she and Bueno used to call each other “Papi” and “Mama.” RP 425, 438, 443. But she acknowledged these are common terms of endearment used in Latino culture. RP 448.

Harris and Jordan said they thought Bueno could read and write in English, disputing his testimony. RP 425. But Harris acknowledged that Bueno never wrote her a letter during their marriage. RP 447. She also conceded she used to attend doctor appointments with him and fill out forms for him because of his limited English ability. Sometimes she would speak for him and answer questions. RP 449-52. Jordan admitted he was only “pretty sure” that Bueno could write in English. RP 517. He had seen Bueno filling out job applications at home, but he only saw him providing standard information such as his name, address, and social security number. RP 515-18.

Because the contents of the letter were the linchpin of the State’s case, the court’s error in admitting the evidence was not harmless. The conviction must be reversed.

**2. The State did not prove beyond a reasonable doubt that Bueno wrote the letter.**

The State did not prove beyond a reasonable doubt that Bueno wrote the letter, in violation of due process.

Due process places the burden on the State to prove the elements of an offense beyond a reasonable doubt. State v. Rich, 184 Wn.2d 897, 365 P.3d 746 (2016); In re Winship, 397 U.S. 358, 364, 90 S. Ct. 1068, 25 L. Ed. 2d 368 (1970); U.S. Const. amend. XIV; Const. art. I, § 3. The question on review is whether, after viewing the evidence in the light most favorable to the prosecution, any rational trier of fact could have found the essential elements of the crime beyond a reasonable doubt. State v. Green, 94 Wn.2d 216, 221, 616 P.2d 628 (1980); Jackson v. Virginia, 443 U.S. 307, 319, 99 S. Ct. 2781, 61 L. Ed. 2d 560 (1979).

Although the State may rely upon circumstantial evidence, “inferences based on circumstantial evidence must be reasonable and cannot be based on speculation.” State v. Vasquez, 178 Wn.2d 1, 16, 309 P.3d 318 (2013). “A ‘modicum’ of evidence does not meet this standard.” Rich, 184 Wn.2d at 903 (quoting Jackson, 443 U.S. at 320).

To prove the crime, the State was required to prove beyond a reasonable doubt that Bueno knowingly violated a provision of the no-

contact order. CP 37; RCW 26.50.110. The State relied entirely upon the letter received by Harris in the mail to prove the crime.

The State did not prove beyond a reasonable doubt that Bueno knowingly violated a provision of the no-contact order because it did not prove he wrote the letter. Bueno denied writing the letter. RP 463, 502. He could not have written the letter because he cannot read or write in English. RP 462-63. He was assisted by a Spanish-language interpreter throughout the proceedings. RP 2, 3, 462. When he and Harris were married, she would assist him whenever he needed to communicate with someone in English. RP 463-64. He has never written her a letter. RP 464.

Reversal for insufficient evidence is equivalent to an acquittal and bars retrial for the same offense. State v. Hummel, 196 Wn. App. 329, 359, 383 P.3d 592 (2016). “The Double Jeopardy Clause forbids a second trial for the purpose of affording the prosecution another opportunity to supply evidence which it failed to muster in the first proceeding.” Id. (quoting Burks v. United States, 437 U.S. 1, 11, 98 S. Ct. 2141, 57 L. Ed. 2d 1 (1978)). The conviction must be reversed and the charge dismissed.

F. CONCLUSION

The trial court abused its discretion in admitting the contents of the letter under the hearsay exception for statements of identification. The conviction must be reversed and remanded for a new trial where that evidence is not admitted. The State did not prove beyond a reasonable doubt that Bueno wrote the letter. The conviction must be reversed and the charge dismissed.

Respectfully submitted this 11th day of May, 2018.

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DIVISION TWO**

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STATE OF WASHINGTON,	)	
	)	
Respondent,	)	
	)	
v.	)	NO. 50930-0-II
	)	
VICTOR BUENO,	)	
	)	
Appellant.	)	

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**DECLARATION OF DOCUMENT FILING AND SERVICE**

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# WASHINGTON APPELLATE PROJECT

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