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Court of Appeals
Division II
State of Washington
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NO. 51006-5-II

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

STATE OF WASHINGTON, Respondent

v.

KEITH BYRON WOODY JR, Appellant

FROM THE SUPERIOR COURT FOR CLARK COUNTY
CLARK COUNTY SUPERIOR COURT CAUSE NO.16-1-01922-6

BRIEF OF RESPONDENT

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RESPONSE TO ASSIGNMENTS OF ERROR

- I. **Woody agreed to the restitution amount and the trial court correctly entered the restitution order**
- II. **The trial court properly entered the DNA fee**
- III. **The State agrees the trial court erroneously checked the chemical dependency treatment evaluation box on the judgment and sentence and the judgment and sentence should be amended**
- IV. **The State agrees the trial court erroneously found a motor vehicle was used in commission of the robbery and erroneously required the clerk to forward an abstract to the Department of Licensing for revocation of Woody's driver's license**

STATEMENT OF THE CASE

Keith Byron Woody, Jr. (hereafter 'Woody') was charged by information with two counts of Robbery in the First Degree with a firearm, three counts of Unlawful Possession of a Firearm in the First Degree, and four counts of Assault in the Second Degree with a firearm. CP 4-7. With these charges, the State alleged Woody robbed a Walgreens pharmacy of prescription medications on June 7, 2016 and robbed the Mill Plain Pharmacy of prescription medications on August 22, 2016. CP 4-7. Specifically, the allegations were that Woody and an accomplice entered Walgreens on June 7, 2016 and pointed handguns at the pharmacist and ordered her to give them cash and drugs. CP 19. Woody and his

accomplice made away with nearly \$1,000 cash and a large amount of narcotic medications. CP 19-20. The State further alleged that Woody and an accomplice entered the Mill Plain Pharmacy on August 22, 2016 with firearms and ordered everyone in the pharmacy to “get down” and demanded “oxy”. Supp CP 76. Multiple witness-victims of this incident reported the men held up a gun, pointed it at individuals and ordered them to get down. *Id.*

Walgreens provided police with surveillance footage of the June 7 robbery. CP 19. From this footage and witness statements, police identified the two suspected robbers as black males; one was wearing a black sweatshirt with a distinct stars/stripes design on it. CP 19. Around the same time period, the Portland Police Bureau (PPB) in Oregon was investigating a series of armed pharmacy robberies occurring in the Portland Metro area. CP 19. During PPB’s investigation, they recovered a vehicle believed to have been used in one of the Portland robberies, and obtained a warrant to search it. CP 19. Inside the vehicle police found an Oregon identification card for Woody and the same black sweatshirt with the distinct stars/stripes design on it. CP 19. A DNA test performed on the sweatshirt showed the major contributor of the DNA obtained from the sweatshirt was Woody. CP 20. Vancouver police also obtained a booking photo of Woody from a prior arrest in Oregon; one of the perpetrators

depicted in the Walgreens surveillance video bore a strong resemblance to Woody. CP 19.

On August 22, 2016, very close in time to the Mill Plain pharmacy robbery, a Vancouver Police Detective observed two black men running towards a gold color mid-2000's vehicle which the officer thought was a Lexus. Supp. CP 76-77. Another witness provided a license plate of 061DNB for this vehicle, which returned as a 2002 Toyota. Supp. CP 77. That vehicle was caught running a red light in Portland, Oregon, and a traffic camera took a photograph of the driver, which appeared to be the second robber. Supp. CP 77. PPB later found the vehicle abandoned in Portland. Supp. CP 77. A search pursuant to a warrant found a fingerprint inside the vehicle belonging to Keandre Brown, who was later charged as Woody's accomplice in these robberies. Supp. CP 77; CP 4-7.

Woody was arrested while driving a motor vehicle in Vancouver on October 20, 2016 on a warrant; Brown was also in the vehicle with him and he was arrested on a fugitive warrant from Oregon. Supp. CP 77. When arrested, Woody had a 9mm handgun in his possession. Supp. CP 77. Woody was a convicted felon who was prohibited from possessing firearms. Supp. CP 77. Police later searched this vehicle pursuant to a warrant and discovered two additional handguns: a .357 revolver and a .40 caliber handgun. Supp. CP 77. During an interview with police, Woody

admitted to the Mill Plain pharmacy robbery and identified himself on the surveillance footage from that robbery. Supp. CP 77.

On August 24, 2017, Woody entered a guilty plea to a second amended information charging one count of Robbery in the First Degree for the Mill Plain pharmacy robbery, one count of Assault in the Second Degree against the pharmacist of the Walgreens robbery, and one count of Unlawful Possession of a Firearm in the First Degree. CP 33-34. His plea was made pursuant to a plea agreement Woody entered into with the State, whereby the State agreed to dismiss 8 counts from this cause number, have Woody plead guilty to the charges contained in the second amended information, and allowed both parties to be free to argue for a sentence within the standard range. CP 46-47. As part of the plea agreement, Woody agreed to have the court assess the “biological collection fee of \$100.00.” CP 47. The plea agreement also stated: “To accept this offer, defendant agrees to pay restitution (in an amount presently understood to be set) which could be established or modified by the court at a later date based on additional information. The defendant agrees to pay restitution to victims of uncharged crimes contained in the discovery, and/or dismissed counts.” CP 47. Woody also agreed to revocation/suspension of his driver’s license pursuant to RCW 46.20.285 or RCW 69.50.420. CP 47. The plea agreement also indicated that by accepting it, “the defendant is

agreeing to stipulate to its terms and recommendations, unless otherwise noted.” CP 46. The plea agreement was attached to Woody’s statement on plea of guilty. CP 35-52.

At his guilty plea hearing on August 24, 2017, Woody indicated to the court that he had read through the statement on plea of guilty, and that no one was forcing him to plead guilty. RP 13-14. The trial court went through all the rights Woody gave up by pleading guilty, and discussed the consequences of his guilty plea. RP 14-16. In addition, it was made clear that the State was going to recommend a sentence of 162 months. RP 16-17. The trial court told Woody that the prosecutor’s recommendation was based on the high end of the standard range of 102 months with 60 months of a firearm enhancement added on to it. RP 17. When asked by the court “is that the way that you understand their offer?” Woody answered “Yes, sir.” RP 17. After additional colloquy, the court accepted Woody’s guilty plea. RP 26. Sentencing was set for September 15, 2017. RP 27.

At the sentencing hearing on September 15, 2017, the State asked the trial court to impose the high end of the standard range on Robbery in the First Degree, with 60 months for the firearm enhancement running consecutively. RP 28-29. The State further asked the Court to impose the high end of the range on the Assault in the Second Degree and Unlawful Possession of a Firearm in the First Degree counts and to run those

concurrent to the Robbery sentence. RP 28-29. The State noted to the trial court that “Restitution is being recommended and I don’t think it’s disputed at \$15,376.36. That represents narcotics stolen in the two episodes.” RP 32. Woody asked the court to impose the low end of the sentencing range on the Robbery, for 137 months to serve. RP 37. The court imposed the high end of the sentencing range, sentencing Woody to serve a total of 162 months. RP 44-45. Regarding restitution, the following exchange took place at the hearing:

THE COURT: Stipulated restitution?

DEFENSE: I believe – I can’t remember.

PROSECUTOR: We had provided the documentation. I don’t think it’s a – it’s solely for the stolen narcotics, Your Honor.

THE COURT: On the restitution, Mr. Woody, they have got \$15,376.00 for restitution that you would owe. You are entitled to a hearing to set the amount of restitution. It would require you coming back. Stipulate?

DEFENSE: We want to stipulate.

RP 45. The court entered restitution for the amount of \$15,376.36, which included \$3,917.01 to Walgreens, from the Robbery count charged in the amended information, which was dismissed pursuant to the plea agreement which included Woody’s agreement to pay restitution to victims on any dismissed charges. CP 46, 59.

The court indicated it found Woody currently indigent, and waived all the non-mandatory fees. RP 46. The court imposed \$500.00 victim assessment, and \$100.00 DNA collection fee. CP 58-59. In the judgment, the trial court entered findings, including that Count 1 (Robbery in the First Degree), was a felony in the commission of which the defendant used a motor vehicle, citing to RCW 46.20.285. CP 54. The court indicated that it found Count 1 was a felony in which a motor vehicle was used and ordered the clerk to forward an abstract of the court record to the DOL which was required to revoke Woody's driver's license. CP 61. The court also ordered Woody to undergo an evaluation for treatment for chemical dependency. CP 57.

Woody then filed a timely notice of appeal.

ARGUMENT

I. Woody agreed to the restitution amount and the trial court correctly entered the restitution order

Woody argues that the trial court lacked the authority to impose restitution to Walgreens for its losses from the June 7, 2016 robbery because Woody was not convicted of robbery regarding this incident, and only was convicted of assaulting the pharmacist. Therefore, Woody argues, there is no causal connection between his assault of the pharmacist and the restitution imposed for loss of property – the narcotics stolen in

the robbery. Woody incorrectly asserts that he did not agree to pay restitution for uncharged or dismissed offenses as part of his plea agreement, and incorrectly argues the State agreed there was no agreement to restitution. Woody did agree to pay restitution for uncharged and dismissed offenses; the State's comments at sentencing indicate that restitution was not disputed, and Woody clearly stipulated to restitution being imposed at the sentencing hearing. Woody's claim the trial court had no authority to enter the restitution amount is incorrect. The trial court's imposition of restitution to Walgreens should be affirmed.

A trial court must order restitution when a defendant has been convicted of an offense that resulted in damage to, or loss of, property. RCW 9.94A.753(3); *State v. Griffith*, 164 Wn.2d 960, 195 P.3d 506 (2008). Restitution may be ordered for losses that are causally connected to the charged crimes or, if the defendant agrees, other crimes for which he was not convicted. *Griffith*, 164 Wn.2d at 965-66 (quoting *State v. Tobin*, 161 Wn.2d 517, 166 P.3d 1167 (2007) (quoting *State v. Kinneman*, 155 Wn.2d 272, 119 P.3d 350 (2005)) and *State v. Woods*, 90 Wn.App. 904, 953 P.2d 834 (1998) (quoting *State v. Johnson*, 69 Wn.App. 189, 847 P.2d 960 (1993))).

Below, the State charged Woody with two counts of Robbery in the First Degree for two separate robberies, and four counts of Assault in the

Second Degree. CP 4-7. Woody entered into a plea agreement in which he entered a guilty plea to one count of Robbery in the First Degree, one count of Assault in the Second Degree, and one count of Unlawful Possession of a Firearm in the First Degree, and in exchange, the State agreed to dismiss eight other felony charges. CP 46-47. As part of this plea agreement, Woody “agree[d] to pay restitution (in an amount presently understood to be set) which could be established or modified by the court at a later date based on additional information. The defendant agrees to pay restitution to victims of uncharged crimes contained in the discovery, and/or *dismissed counts*.” CP 47 (emphasis added). Based on this express statement that by accepting the offer from the State and entering into the plea agreement, Woody agreed to pay restitution to the victims of any dismissed counts, the trial court properly ordered Woody to pay restitution to Walgreens for the losses it incurred from the robbery that was originally charged.

Furthermore, the State is relieved of its duty to prove an evidentiary nexus between a defendant’s acts and the losses incurred when that defendant agrees as part of a plea agreement to pay restitution for crimes that were dismissed. *See Griffith*, 164 Wn.2d at 965-66 (quoting *Woods*, 90 Wn.App. at 908 (quoting *Johnson*, 69 Wn.App. at 191)). Furthermore, a promise to pay restitution for uncharged or dismissed counts is binding.

State v. Hunsicker, 129 Wn.2d 554, 919 P.2d 79 (1996). As Woody agreed to pay restitution for “uncharged crimes contained in the discovery, and/or dismissed counts,” the State did not need to show an evidentiary nexus between his acts and the losses incurred by the victims. The trial court correctly imposed restitution to Walgreens as the victim of a dismissed count which Woody agreed to pay.

Woody’s contention that he did not agree to pay restitution for uncharged or dismissed crimes is patently incorrect. By taking advantage of the offer from the state and entering into the plea agreement, Woody agreed to “stipulate to its terms.” CP 46. One of those terms clearly indicated that Woody agree to “pay restitution to victims of uncharged crimes contained in the discovery, and/or dismissed counts.” CP 47. Woody’s statement that he did not agree to pay restitution for uncharged or dismissed offenses as part of the plea agreement is disingenuous given the explicitly clear language contained in the plea agreement which shows Woody expressly agreed to restitution. This agreement is further supported by the statements made during the sentencing hearing, wherein Woody’s attorney indicated restitution was stipulated. RP 45.

Furthermore, Woody’s contention that the prosecutor “acknowledged at sentencing there was no stipulation to restitution,” is a significant stretch of the meaning of the words stated at the hearing, and is

an unreasonable and incorrect interpretation. The prosecutor stated at sentencing that the restitution was “undisputed,” and further, when the trial court asked if restitution was stipulated, the prosecutor said, “We had provided the documentation. I don’t think it’s a – it’s solely for the stolen narcotics, Your Honor.” RP 45. From this, Woody somehow interprets that the prosecutor “acknowledged at sentencing there was no stipulation to restitution.” *See* Br. of Appellant, p. 12. How Woody comes to this conclusion is unclear and is never explained in his brief. The transcript of this statement shows the prosecutor starting to say one sentence, but cutting it off and starting a new sentence. The State anticipates Woody is basing his argument that the prosecutor acknowledged there was no stipulation to restitution from the prosecutor’s fractured sentence of: “I don’t think it’s a --....” RP 45. However, in order for Woody to come to the conclusion that the prosecutor meant to say that there was no agreement on restitution he would have to insert words never uttered by the prosecutor into that statement. Instead, this Court should refuse to guess at the meaning of a statement or create new meaning by adding words, and instead take the statement for what we can actually know the prosecutor meant. The full statement by the prosecutor on RP 45 can clearly be interpreted as telling the court it had provided Woody with all the restitution documentation and that restitution was only for the

narcotics that were stolen. RP 45. Whether the prosecutor meant to say what Woody guesses he did, or was thinking of saying “I don’t think it’s a: [problem] [fight] [case where we’ll need a hearing as the defendant agreed in the plea agreement to pay this restitution],” we cannot know from the record below. Woody’s conclusion that the prosecutor acknowledged there was no stipulation is without any factual support.

Instead, Woody remained silent during the exchange regarding restitution at his sentencing hearing. When the trial court asked him if restitution was stipulated, and his attorney indicated “we want to stipulate,” and Woody remained silent, it’s reasonable to find this indicated Woody’s desire to stipulate to the restitution. When all the circumstances are taken into consideration it is clear Woody agreed to pay restitution to the victim of the dismissed charge in exchange for a significant reduction in his sentence and dismissal of eight felony counts. The plea agreement attached to Woody’s guilty plea statement clearly states all terms are stipulated and the defendant agrees to pay restitution on dismissed charges. CP 46-47. The restitution that was requested by the State, stipulated to by Woody, and entered by the court provided for restitution to the victim of the dismissed charge and the victim of the count he pled guilty to. All these circumstances conclusively show Woody agreed to pay restitution to Walgreens.

As Woody clearly agreed to pay restitution to the victim of the dismissed charge, the trial court correctly exercised its authority and entered restitution for the losses incurred as a result of both robberies. Woody's claim the trial court unlawfully ordered he pay restitution to Walgreens is without merit. The trial court should be affirmed.

II. The trial court properly entered the DNA fee

For the first time on appeal Woody argues the trial court erred in failing to consider whether his mental health condition prevents him from being able to pay the \$100 DNA fee prior to imposing that fee. There was no evidence that Woody suffered from a "mental health condition" as that phrase is defined by RCW 9.94A.777 and therefore the court was not required to consider alleged difficulties Woody had 12 years prior, as a 13-year-old, prior to imposing the DNA fee. The trial court's imposition of the \$100 DNA fee should not be disturbed.

Woody failed to raise the issue of the imposition of the \$100 DNA fee to the trial court below. RAP 2.5 allows this Court to decline to review issues raised for the first time on appeal. RAP 2.5(a). In this case, there are reasons why this Court could decide not to review this issue. One main reason why issues raised for the first time on appeal are often not reviewed is because failure to raise the issue to the trial court precluded the trial court from fixing an error and it precluded the trial court from developing

a record. Thus, when a defendant raises an issue for the first time on appeal, the record may not contain certain facts or arguments from the State that may be critical to either the trial court's or this Court's determination of the issue. As Woody did not raise the issue below, the discussed medical records were not made part of the record and were not contested or discussed by the State as they had little, if any, relevance to the other issues before the court. This failure to raise the issue below therefore prevents full review by this Court now, and it is without knowing the contents of the medical records or having additional information which could have been proffered to the trial court below.

However, if this Court reviews this issue, the State asks that it find Woody could not show that RCW 9.94A.777 applies to him and he therefore is not entitled to relief. Generally, the DNA fee is a mandatory fee required by RCW 43.43.7541. In most circumstances, the trial court does not have discretion in whether to impose mandatory fees. However, RCW 9.94A.777 provides that a trial court must determine whether a defendant with "mental health conditions" has the ability to pay LFOs, including some mandatory fees. A defendant only "suffers from a mental health condition" if 1) the defendant has been diagnosed with a mental disorder and that disorder prevents him/her from participating in gainful employment; and 2) there is evidence to support this consisting of: a)

enrollment in public assistance program due to a determination of mental disability; b) record of involuntary hospitalization; or c) competent expert evaluation. RCW 9.94A.777(2). There was no evidence presented that Woody suffered from a mental health condition as there was no evidence of his enrollment in a public assistance program due to a determination of mental disability, involuntary hospitalization, or an expert evaluation declaring him to suffer from a mental health condition. The only evidence Woody presented were some medical reports from 2005,¹ long before his fall 2017 sentencing, that appear to have indicated he had a difficult childhood and suffered from ADHD. *See* RP 33. They were explicitly referred to as “medical records,” and no mention was made that a competent expert had done an evaluation of him, nor were these records indicated to have been from an involuntary hospitalization or from a public assistance program’s determination of eligibility for assistance. Woody did not “suffer from a mental health condition” for purposes of RCW 9.94A.777.

Woody cites to *State v. Tedder*, 194 Wn.App. 753, 378 P.3d 246 (2016) to support his argument that the trial court was required to consider his ability to pay before imposing the mandatory DNA fee. However, the

¹ When reviewing Woody’s medical records, the court asked, “Anything more recent than 2005?” Woody indicated they had tried to find others, but what the court had were the most recent reports. RP 33. These medical records were not filed with the superior court and are therefore unavailable on review.

circumstances in *Tedder* differ significantly from the factual situation in Woody's case. The defendant in *Tedder* had been in mental health court and had been involuntarily hospitalized due to mental health issues on a number of occasions, and had been diagnosed with schizoaffective disorder, antisocial personality disorder, and bipolar I disorder. *Tedder*, 194 Wn.App. at 754-56. With that evidence in the record, the Court of Appeals found the defendant clearly suffered from a mental health condition as defined in RCW 9.94A.777. Unlike the defendant in *Tedder*, there was no evidence that Woody had ever been involuntarily hospitalized or been in mental health court. As no evidence supports that Woody suffered from a mental health condition, the provisions of RCW 9.94A.777(1) are inapplicable. In *Tedder*, after indicating this evidence clearly shows the defendant qualified as suffering from a mental health condition under RCW 9.94A.777(2), this Court went on to conclude the trial court should have considered whether he had the means to pay under RCW 9.94A.777(1). *Tedder*, 194 Wn.App. at 757. Woody does not suffer from a mental health condition as described in RCW 9.94A.777(2) and therefore the trial court did not need to consider whether said mental health condition prevented him from being able to pay the \$100 DNA fee.

If this Court reviews this issue for the first time on appeal, it should find there is no evidence to support that Woody suffered from a mental

health condition under RCW 9.94A.777(2), and therefore the trial court's imposition of the DNA fee without applying RCW 9.94A.777(1) was not erroneous. The trial court should be affirmed.

III. The State agrees the trial court erroneously checked the chemical dependency treatment evaluation box on the judgment and sentence and the judgment and sentence should be amended

The State agrees and concedes that the trial court should not have imposed chemical dependency evaluation and treatment in the judgment and sentence. This condition was never discussed at sentencing; there were no facts which showed Woody used drugs during the offenses or that his drug use contributed to the commission of the offenses. Accordingly, the State agrees with Woody that the trial court should not have imposed this condition; it appears to have been a scrivener's error and this Court should remand with instruction to the trial court to strike this condition from the judgment.

IV. The State agrees the trial court erroneously found a motor vehicle was used in commission of the robbery and erroneously required the clerk to forward an abstract to the Department of Licensing for revocation of Woody's driver's license

The State agrees and concedes that the trial court did not have a factual basis from which to find Woody used a motor vehicle in the commission of the robbery count. Without a sufficient factual basis, the

trial court should not have made a finding that a motor vehicle was used during the commission of a felony. The matter should be remanded to the trial court with instruction to strike this finding from the judgment.

CONCLUSION

The trial court properly entered restitution based on Woody's express agreement to pay restitution to the victims of any charges dismissed pursuant to the plea agreement. The trial court's entry of the restitution order should be affirmed. The trial court also properly assessed the mandatory \$100 DNA fee without considering RCW 9.94A.777(1) as that statute was inapplicable to Woody. The trial court improperly ordered a chemical dependency treatment evaluation and improperly found a motor vehicle was used during the commission of a felony. Accordingly, the matter should be remanded to correct the judgment by striking the chemical dependency treatment evaluation and motor vehicle use finding. The trial court should be affirmed in all other respects.

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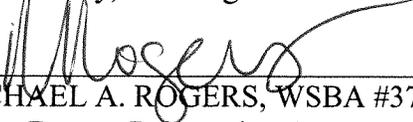
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DATED this 8th day of May, 2018.

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