

FILED
Court of Appeals
Division II
State of Washington
1/16/2018 12:52 PM
No. 51037-5-II

COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION II

STATE OF WASHINGTON

V.

CARLOS HULL

BRIEF OF APPELLANT

Thomas E. Weaver
WSBA #22488
Attorney for Appellant

The Law Office of Thomas E. Weaver
P.O. Box 1056
Bremerton, WA 98337
(360) 792-9345

TABLE OF CONTENTS

A. Assignment of Error.....	1
B. Summary of Argument.....	1
C. Statement of Facts.....	3
D. Argument.....	10
E. Conclusion.....	17

TABLE OF AUTHORITIES

Cases

<i>Chapman v. California</i> , 386 U.S. 18, 87 S.Ct. 824, 17 L.Ed.2d 705 (1967)	13
<i>In re Salinas</i> , __ Wn.2d __, __ P.3d __ (decided January 4, 2017).....	12
<i>McKaskle v. Wiggins</i> , 465 U.S. 168, 176-77, 104 S.Ct. 944, 79 L.Ed.2d 122 (1984).....	11
<i>State v. Allen</i> , 161 Wn.App. 727, 255 P.3d 784 (2011).....	10, 14
<i>State v. Coristine</i> , 177 Wn.2d 370, 376, 300 P.3d 400 (2013)	11, 12, 13
<i>State v. Jones</i> , 99 Wn.2d 735, 664 P.2d 1216 (1983).....	12
<i>State v. Laureano</i> , 101 Wn.2d 745, 682 P.2d 889 (1984).....	10
<i>State v. Levy</i> , 156 Wn.2d 709, 132 P.3d 1076 (2006).....	10
<i>Weaver v. Massachusetts</i> , __ U.S. __, 137 S. Ct. 1899, 198 L. Ed. 2d 420 (2017).....	12

A. Assignment of Error

Assignment of Error

The trial court erred by instructing the jury, over defense objection, on factors to be considered in determining the weight to be given to eyewitness identification testimony.

Issue Pertaining to Assignment of Error

In a case where no eyewitness actually identified the defendant, either pretrial or during trial, the State requested the Court instruct the jury using WPIC 6.52, which lists eight non-exclusive factors to be considered in determining the weight to be given to eyewitness identification testimony. The defense timely objected. Does the giving of WPIC 6.52 over defense objection infringe on the defendant's Sixth Amendment right to control strategic decisions in his case and constitute an impermissible comment on the evidence?

B. Summary of Argument

In the early morning hours of August 23, 2015, at approximately 2:18, gun shots rang out in the parking lot of the Pole Position bar in Tacoma. RP¹, 219, 418. Five shell casings were later recovered from the

¹ All references to the report of proceedings (RP) refer to the trial transcript prepared by Timothy Regis except July 11, 2017, which was transcribed by court reporter Carla Higgins, and is referenced as HRP.

crime scene. RP, 476. Three highly intoxicated white men celebrating a bachelor party who had just left the bar on their way to Denny's Restaurant were hit by gun fire or otherwise seriously injured. Three eyewitnesses, all employees of the bar, witnessed the shooting and testified at trial. Although there was not video surveillance footage of the shooting itself, there was a surveillance video of various people entering and leaving through the front door of the bar.

From the beginning, this case was a who-done-it and continued as such throughout the trial. Eventually, Carlos Hull was arrested and charged with the shooting. At trial, all three eyewitnesses identified a photographic image of a black male leaving the bar taken from the surveillance video as "the shooter." None of the eyewitness identified Mr. Hull in open court as the shooter, however. To the contrary, every eyewitness who was asked to identify the shooter in a pre-trial photo montage identified someone other than Mr. Hull as the shooter. Despite the lack of either an in-court or out-of-court identification of Mr. Hull by any eyewitness, the trial court instructed the jury using WPIC 6.52, a recently adopted pattern instruction that lists eight non-exclusive factors to be considered in determining the weight to be given to eyewitness identification testimony. Mr. Hull timely objected to the use of the instruction. The giving of the instruction infringed on Mr. Hull's Sixth

Amendment right to control strategic decisions in his case and constituted an impermissible comment on the evidence in violation of Article 4, Section 16 of the Washington Constitution. Reversal is required.

C. Statement of the Facts

Brandon Walker, the groom, was out with his friends Randy Stone and Shane Giannini on August 23 to celebrate his up-coming nuptials. RP, 290. Mr. Walker was highly intoxicated and has only vague memories of the evening. RP, 285. After the bar closed for the night, Mr. Walker and his friends were intending on crossing the street to a nearby Denny's when they had an interaction with a group of guys in the parking lot. RP, 285-87. He recalled exchanging "some words" with the guys and trying to de-escalate the situation when he took a "hit to the head." RP, 285. He woke up in the emergency room with an injury to the side of his head and a swelled ankle. RP, 285. Doctors determined Mr. Walker's right ankle was shattered and required nine screws. RP, 289.

Mr. Giannini testified to having a "patchy" memory of the incident. RP, 300. He was very intoxicated. RP, 305. He recalled discussing Denny's with Mr. Walker when "some words were exchanged" with another group. RP, 300. Then he heard gun shots. RP, 300. Although he saw the shooter, it was more of an "image" and he could not see a face. RP, 305. He believed the shooter was shooting using his left

hand². RP, 311. Mr. Giannani was hit in the right bicep by a bullet. RP, 308.

Mr. Stone remembered leaving his house around 3:00 in the afternoon, and waking up the next day in the hospital. RP, 205-06. He attributed his memory loss to a combination of alcohol consumption and shock from the events of the evening. RP, 216. Mr. Stone was hit by three bullets, one to his right arm, one to his left hip, and one to his left femur. RP, 209. One of the bullets went through his intestine and scrotum, completely destroying his right testicle and damaging his left. RP, 210.

In addition to the three bachelor party revelers, the State called three eyewitnesses to the shooting. Tony Chambers was the manager of the nearby strip club, Fox's. RP, 221. Mr. Chambers was standing in the parking lot about six feet from the Pole Position from door watching as the drunk patrons spilled into the shared parking lot at closing time. RP, 223, 225. Rachel Kershaw worked as a server at Pole Position. HRP, 26. Jermaine Berry worked as a cook at Pole Position. RP, 350. Ms. Kershaw and Mr. Berry had just got off work for the day and were about to head home when the shooting happened. HRP, 27, RP, 350.

Just prior to the shooting, Ms. Kershaw was in the beer garden with Mr. Berry and "the shooter" smoking a marijuana cigarette. HRP, 40-

² Carlos Hull is right handed. RP, 509.

41. She smoked with him for fifteen minutes, standing one to three feet away from him. HRP, 70. Curiously, Mr. Berry remembered smoking in the beer garden with Ms. Kershaw, but he denied anyone else was with them, specifically any of the black men. RP, 396.

Mr. Chambers observed three white men he recognized from being in the strip club earlier walking in the parking lot. RP, 227. They appeared to him to be coming from the direction of Denny's. RP, 228. Mr. Berry described them as "white boy wasted." RP, 354. As they crossed the parking lot, the three white men had "an altercation" with three black men³. RP, 235. To Mr. Berry, it appeared the drunk white guys were getting on the nerves of the black guys. RP, 354. The argument started quickly and ended just as quickly, with everyone shaking hands and starting to leave. RP, 230. Just when it seemed like "everything was fine," one of the black men hit one of the white men in the back of the head, causing him to fall to the ground. RP, 232-33. The two remaining white men started to move towards their fallen friend when one of the black men "just started shooting." RP, 232, 235.

³ Mr. Chambers initially testified the second group had seven black people, five men and two women. RP, 229-30. But he later clarified that two of the black men seemed to pair up with the black women, separating themselves from the other three black men RP, 234.

Mr. Chambers and Ms. Kershaw testified the shooter was the same person as the assailant. RP, 232, HRP, 52. On the other hand, Mr. Berry testified the assailant was a different person than the shooter. RP, 403.

Mr. Chamber initially responded by trying to get everyone inside the building. RP, 235. He then pulled one of the shooting victims into the building with him and tried to stop the bleeding. RP, 235. Ms. Kershaw jumped the fence and ran into the bar. HRP, 54. Mr. Berry observed the shooter drive away in a silver grayish Impala with silver rims. RP, 374-75.

Shortly after the shooting, police pulled over a vehicle believed to be connected with the shooting. RP, 246. Mr. Chambers was asked to identify the occupants of the vehicle. RP, 246. Mr. Chambers testified the occupants were with the shooter, but neither was the actual shooter. RP, 246.

Although investigation did not recover surveillance video of the actual shooting, it did uncover a video prior to the shooting with two vantage points: the beer garden and the facing the front of the bar. HRP, 58-59; Exhibit 32. In the video at time stamp 1:49, an individual can be seen walking through the front door of the bar. HRP, 65. All three witnesses identified the person on the video screen as the shooter. HRP, 65, RP, 251, 382-83. Mr. Berry was one hundred percent certain the person depicted on the video was the shooter. RP, 382-83. Curiously,

although Ms. Kershaw, Mr. Chambers, and Mr. Berry were each called to the witness stand and asked whether the person depicted on the video was the shooter, none were asked whether the person sitting in open court at counsel table (appellant Carlos Hull) was the shooter.

After the night of the shooting, the investigation lay dormant for about seven months. On March 24, 2016, Detective Byron Broadway was reassigned the case. RP, 420. For reasons that are not entirely clear from the record, he believed Carlos Hull to be a person of interest in the investigation. RP, 424.

The parties entered into a stipulation that read as follows: “On January 25, 2015, Pierce County Sheriff’s Deputy Seth Huber conducted a traffic stop of a motor vehicle that the defendant was driving. He was the sole occupant of the vehicle at that time. The motor vehicle was a four-door Chevrolet Impala with Washington State license plate ABV1937 and Vehicle Identification Number 2G1WT58N279238195. The Chevrolet Impala was silver in color, it had tire rims that were silver in color, and it had no tinting in the windows. This motor vehicle is registered to the defendant’s mother, Yolanda Hull.” RP, 414-15. Department of Licensing records reveals Yolanda Hull purchased the Impala in 2010 and owned it until at least July of 2016. RP, 444.

Detective Broadway created a photo montage depicting six twenty-something African-American men, with Mr. Hull in position 5. RP, 432-34. The picture of Mr. Hull was taken on July 6, 2015, a mere 48 days before the shooting. RP, 432. Mr. Chambers was shown the photo montage on April 12, 2016. RP, 460. Mr. Chambers opined that there were three individuals depicted in the montage that possibly could be the shooter, but he circled the person in position 6 as the most likely shooter. RP, 258. Curiously, none of the three possibles was Mr. Hull. RP, 460. Detective Broadway determined Mr. Berry had moved to Texas, so he enlisted the aid of Texas police in contacting Mr. Berry. Mr. Berry was shown the same photo montage. RP, 436. Mr. Berry circled position 4, with 75 percent certainty he was the shooter. RP, 391-92. Ms. Kershaw was never shown the montage.

On June 23, 2016, Detective Brockway contacted Mr. Hull and asked to interview him. RP, 445. The interview was recorded and a transcript of the interview appears in the as an appendix to the defense CrR 3.5 brief. CP, 16. During the interview, Mr. Hull was shown still photos taken from the surveillance video from the night of the shooting. Mr. Hull identified himself as the person depicted in the video, the same person identified by Ms. Kershaw, Mr. Chambers, and Mr. Berry as being the shooter. Mr. Hull denied being the shooter, however.

Mr. Hull testified on his own behalf. RP, 501. Mr. Hull admitted he was at the Pole Position on August 23, 2015. RP, 506. In fact, he remembered sharing a shot of Patron Tequila with Randy Stone. RP, 507. He arrived to the Pole Position with his friend Darius Stokes in Mr. Stokes' Honda Civic. RP, 507. When the bar closed at 2:00, he and Darius Stokes left together right away in the Honda Civic. RP, 508. He did not have access to his mother's Impala because the last time he drove it on January 25, 2015 he had a suspended license and his mother took away the car keys from him. RP, 508-09. He was not armed with a firearm and did not shoot anyone that day. RP, 509.

Mr. Hull was charged by second amended information with two counts of first degree assault, one count of second degree assault, and unlawful possession of a firearm in the first degree, plus firearm enhancements. CP, 107. The State proposed a jury instruction based upon WPIC 6.52. RP, 527. Mr. Hull objected to the instruction. RP, 527-28. The Court used the instruction, which became instruction #4 of the jury packet. CP, 77. The jury convicted him as charged. CP, 110-114.

At sentencing, the Court concluded a standard range sentence would be excessive and imposed a mitigated exceptional sentence. RP, 660. The Court imposed a total of 365 months. CP, 140. This timely appeal followed. CP, 157.

D. Argument

Article 4, section 16 of the Washington Constitution prohibits judges from making comments on the evidence. *State v. Levy*, 156 Wn.2d 709, 132 P.3d 1076 (2006). Any remark that has the potential effect of suggesting that the jury need not consider an element of an offense can qualify as judicial comment. *Levy* at 721. The trial court instructed the jury using WPIC 6.52, which became jury instruction #4, over the defense objection. This was error.

Historically, jury instructions that comment on the reliability of eyewitness testimony have been disallowed in Washington on the ground that they constitute an impermissible comment on the evidence. *State v. Laureano*, 101 Wn.2d 745, 682 P.2d 889 (1984). As recently as 2011, Washington courts have disallowed such instructions. *State v. Allen*, 161 Wn.App. 727, 255 P.3d 784 (2011).

In 2014, the WPIC Committee approved WPIC 6.52 after extensive lobbying by the defense community.⁴ There are no Court of Appeals cases interpreting it. The first sentence to the Comment states, “This instruction is intended for use *solely* in criminal prosecutions in which the jury has heard eyewitness identification testimony.” (Emphasis

⁴ To that extent, the prosecutor was correct at trial when he said, “I thought this instruction was crafted at the behest of the state defense because of the accuracy or fallibility of eyewitness testimony.” RP, 528.

added.) Later the Comment states, referencing a similarly phrased California instruction, “With a view to juror comprehension and neutrality of phrasing, and Washington's prohibition on judicial comments on the evidence, the committee has made some modifications.”

Mr. Hull is not arguing that WPIC 6.52 is always inappropriate. He is arguing, however, that it should only be given when the facts of the case justify using it. More importantly, when it is the prosecutor that is seeking the eyewitness identification instruction over defense objection, it is error to give the instruction.

The Supreme Court addressed a similar issue recently in the context of an affirmative defense. *State v. Coristine*, 177 Wn.2d 370, 376, 300 P.3d 400 (2013). In a second degree rape prosecution, the defendant testified in a manner consistent with the affirmative defense set out in RCW 9A.44.030(1). The prosecutor proposed such an instruction, but the defense timely objected. The Court instructed the jury nevertheless and the Supreme Court reversed, saying, “Presenting one's own defense also affirms individual dignity and autonomy. To further the truth-seeking function of trial and to respect the defendant's dignity and autonomy, the Sixth Amendment recognizes the defendant's right to control important strategic decisions.” *Coristine* at 376, citing *McKaskle v. Wiggins*, 465 U.S. 168, 176-77, 104 S.Ct. 944, 79 L.Ed.2d 122 (1984) (other citations

omitted). Trial courts in Washington recognize that “respect for a defendant's freedom as a person mandates that he or she be permitted to make fundamental decisions about the course of proceedings [and s]uch respect demands that courts do not impose defenses on unwilling defendants.” *Coristine* at 377, quoting *State v. Jones*, 99 Wn.2d 735, 664 P.2d 1216 (1983).

Some jury instructions are mandatory in every case. For instance, it is always error to fail to instruct a criminal jury on reasonable doubt. See *In re Salinas*, ___ Wn.2d ___, ___ P.3d ___ (decided January 4, 2017), citing *Weaver v. Massachusetts*, ___ U.S. ___, 137 S. Ct. 1899, 198 L. Ed. 2d 420 (2017). But most jury instructions are discretionary, depending upon the particular facts of the case. The defendant in *Coristine* was objecting to an affirmative defense that, if successful, would have constituted a complete defense to the crime. It would certainly not have been error to give the instruction had it been requested by the defense. Nevertheless, the Supreme Court held that the defendant’s right to control strategic decisions in the case trumped the Court’s desire to give the unnecessary instruction. Mr. Hull was objecting to a jury instruction that was ostensibly pro-defense, and in a different case might have been entirely appropriate. His strategic decision should have trumped the Court’s inclination to give the instruction.

The Comment to the Instruction makes clear that WPIC 6.52 should only be given when the jury has heard “eyewitness identification testimony.” But in this case, no such testimony was presented. The jury heard from six eyewitnesses to the shooting. Three of them were victims of the shooting who, due to extreme alcohol consumption, shock from being injured, or both, were unable to remember any helpful information regarding the identity of the perpetrator. The remaining three witnesses, although they identified the videographic image of a man exiting the bar in Exhibit 32 as the shooter, were never asked to identify Mr. Hull as the shooter. Additionally, when Mr. Chambers and Mr. Berry were presented with a photo montage, both of them selected men other than Mr. Hull. There was, therefore, no “eyewitness identification testimony” to justify the giving of the instruction.

When a Court improperly gives a jury instruction over defense objection in contravention of his right to control strategic decisions, the error is of constitutional magnitude and requires reversal unless harmless beyond a reasonable doubt. *Coristine* at 383, citing *Chapman v. California*, 386 U.S. 18, 87 S.Ct. 824, 17 L.Ed.2d 705 (1967). The error in Mr. Hull’s case is not harmless.

First, no witness ever identified Mr. Hull as the shooter in open court. The dramatic moment that happens in most criminal trials where

the eyewitness points across the courtroom at counsel table and identifies the defendant by an item of clothing or other distinguishing mark did not happen in this case. Even Ms. Kershaw, who claimed she spent fifteen minutes with the shooter smoking a cigarette, was never asked to identify Mr. Hull.

Second, Mr. Hull consistently denied ever being the shooter, beginning with his June 23, 2016 interrogation and concluding with his in-court testimony under oath.

Third, the two witnesses who were asked to attempt to identify Mr. Hull from a photo montage were unable to do so. Mr. Berry was 75 percent certain it was the person in position #4. Mr. Chambers narrowed the field to three different people – fully half of the montage – before picking position #6. Meanwhile, Mr. Hull sat comfortably in position #5, nestled between #4 and #6, unpicked by either witness. Between Mr. Chambers and Mr. Berry, four of the six people portrayed in the montage were selected as possible shooters, leaving only Mr. Hull and one other as someone who could not be the shooter.

Fourth, one of the main impetuses for WPIC 6.52 is to ameliorate the problems created with cross-racial identifications. See, generally, *State v. Allen*, 161 Wn.App. 727, 255 P.3d 784 (2011). But Mr. Hull, Mr.

Chambers, and Mr. Berry are all African-American. RP, 615.⁵ So there was no cross-racial identification issue to address.

Fifth, the closing arguments of the parties demonstrate the prejudice. Mr. Hull's defense counsel did not mention WPIC 6.52 a single time in his closing. Conversely, in his rebuttal closing, the prosecutor dwelled on the instruction for three complete pages:

You have Jury Instruction No. 4. This is an instruction crafted by the Court that talks about eyewitness identifications. We would like to believe that eyewitness identifications are never fallible but, of course, people make mistakes. So the Court has crafted an instruction that gives you things to think about. This is not an exclusive list. It tells you you need other factors relevant to the question, so maybe you can think of other things that are important, but it gives you a list of things to think about: The witnesses' capacity for observation, recall, and identification; the opportunity of the witness to observe the alleged criminal act and the perpetrator of that act. You know that Mr. Chambers was right there viewing everything. The emotional state of the witness at the time of the observation. If you had a witness that was despondent at the time, distressed at the time, maybe she's not able to view things as accurately but, again, Mr. Chambers is just going about his night at this point, he has his wits about him.

The witnesses' ability following the observation to provide a description of the perpetrator of the act. Again, Mr. Chambers, that night in the 911 call to the first deputy who arrived on scene in a recorded statement that night, gives a description of the shooter that's always consistent: Black male, mid-20s, roughly 200 pounds, black hair, short braids, blue sweatsuit. The witnesses' familiarity or lack of familiarity with people of the perceived race or ethnicity of the perpetrator of the act. The idea being here that, though there's a body of science that talks about how people of one race are better equipped to identify people of the same or similar race,

⁵ Although not obvious from the record, Ms. Kershaw is apparently white.

doesn't mean that you can't identify someone of a different race, it just means that you're better equipped to mentally.

So a black guy is better equipped to identify a black guy and a white guy is better equipped to identify a white guy. Doesn't mean a white guy can't identify a black guy; doesn't mean a black guy can't identify a white guy. It just means this is one thing to think about.

And, again, you have two people here, Mr. Chambers and Mr. Berry, both African Americans, who made identifications of the defendant, also an African American. Things to think about.

The period of time between the alleged criminal act and the witnesses' identification. Getting back to Mr. Chambers, his identification of the shooter is within 30 minutes.

The extent to which any outside influence or circumstances may have affected the witnesses' impressions or recollection. I'm not sure there's any of those that exist as to Mr. Chambers, but here's one for Ms. Kershaw: Remember Mr. Huff made a point of explaining how Ms. Kershaw's testimony evolved. What she said was I told them I didn't see anything because I was afraid and people were threatening me not to talk. And even when I came into the witness stand this morning, I was debating, should I say anything? But I decided to come in and tell you exactly what I saw.

When we're talking about outside influences, things like threats are an outside influence. And, again, any other factor relevant to the question.

You know, this instruction, again, is just intended to help guide you, give you some things to think about, because we don't want to just assume that an eyewitness identification is accurate. But think about these factors and think about Mr. Chambers, who makes an identification that night.

No amount of photomontages, showing him 50 possible suspects a day later, a week later, a month later, a year later, was going to change what he knew to be fact that night, having been there, seen everything go down, know where the

cameras are, know that that guy at the door is the one who pulled out the gun and started shooting.

RP, 613-16. Essentially, the prosecutor took a jury instruction intended to make the jury more cautious, and turned it into a judicial comment on the reliability of identifications when they meet a checklist of criteria. Instead of making the jury cautious, it was used by the prosecutor to bolster the non-existent identifications. This was exactly what the defense was trying to avoid by timely objecting to the instruction. The error was not harmless.

The giving of WPIC 6.52 over the timely objection of defense counsel violated Mr. Hull's right to control the strategic decisions of his case and was not harmless beyond a reasonable doubt. Reversal is required.

E. Conclusion

This Court should reverse and remand for new trial.

DATED this 16th day of January, 2018.



Thomas E. Weaver, WSBA #22488
Attorney for Defendant/Appellant

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

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

STATE OF WASHINGTON,)	Court of Appeals No.: 51037-5-II
)	
Plaintiff/Respondent,)	DECLARATION OF SERVICE OF
)	BRIEF OF APPELLANT
vs.)	
)	
CARLOS HULL,)	
)	
Defendant/Appellant.)	

STATE OF WASHINGTON)
)
COUNTY OF KITSAP)

I, Alisha Freeman, declare that I am at least 18 years of age and not a party to this action.

On January 16, 2018, I e-filed the Brief of Appellant in the above-captioned case with the Washington State Court of Appeals, Division Two; and also designated said document to be sent to the Pierce County Prosecutor via email to: PCpatcecf@co.pierce.wa.us, through the Court of Appeals transmittal system.

On January 16, 2018, I deposited into the U.S. Mail, first class, postage prepaid, a true and correct copy of the Brief of Appellant to the defendant:

Carlos Hull, DOC #315923
Coyote Ridge Corrections Center
PO Box 769
Connell, WA 99326

///
///

1 I declare under penalty of perjury under the laws of the State of Washington that the foregoing
2 is true and correct.

3 DATED: January 16, 2018, at Bremerton, Washington.

4 
5 _____
6 Alisha Freeman

THE LAW OFFICE OF THOMAS E. WEAVER

January 16, 2018 - 12:52 PM

Transmittal Information

Filed with Court: Court of Appeals Division II
Appellate Court Case Number: 51037-5
Appellate Court Case Title: State of Washington, Respondent v. Carlos Jermaine Hull, Appellant
Superior Court Case Number: 16-1-03254-2

The following documents have been uploaded:

- 510375_Briefs_20180116125212D2532844_4172.pdf
This File Contains:
Briefs - Appellants
The Original File Name was Hull Brief.pdf

A copy of the uploaded files will be sent to:

- PCpatcecf@co.pierce.wa.us
- kprocto@co.pierce.wa.us

Comments:

Sender Name: Alisha Freeman - Email: admin@tomweaverlaw.com

Filing on Behalf of: Thomas E. WeaverJr. - Email: tweaver@tomweaverlaw.com (Alternate Email:)

Address:
PO Box 1056
Bremerton, WA, 98337
Phone: (360) 792-9345

Note: The Filing Id is 20180116125212D2532844