

FILED
Court of Appeals
Division II
State of Washington
11/20/2018 9:30 AM
NO. 51449-4-II

**COURT OF APPEALS, DIVISION II
STATE OF WASHINGTON**

STATE OF WASHINGTON, RESPONDENT

v.

TERRY LEE RUSSELL, JR., APPELLANT

Appeal from the Superior Court of Pierce County
The Honorable Stanley Rumbaugh

No. 16-1-04077-4

Brief of Respondent

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Table of Contents

A.	ISSUES PERTAINING TO APPELLANT'S ASSIGNMENTS OF ERROR.....	1
1.	Did the trial court properly exercise its discretion in admitting photomontage identification of defendant when it was not impermissibly suggestive, there is not a substantial likelihood of irreparable misidentification, and the victim's in-court identification of defendant as the burglar would have been enough to convict defendant.	1
B.	STATEMENT OF THE CASE.....	1
1.	PROCEDURE.....	1
2.	FACTS	2
C.	ARGUMENT.....	7
1.	THE PHOTOGRAPHIC IDENTIFICATION OF DEFENDANT MEETS DUE PROCESS REQUIREMENTS AS THE PROCEDURE USED WAS NOT SUGGESTIVE AND IT DID NOT GIVE RISE TO A SUBSTANTIAL LIKELIHOOD OF IRREPARABLE MISIDENTIFICATION.	7
D.	CONCLUSION.....	17

Table of Authorities

State Cases

<i>State v. Eacret</i> , 98 Wn. App. 282, 971 P.2d 109 (1999)	9
<i>State v. Hanson</i> , 46 Wn. App. 656, 731 P.2d 1140 (1987).....	7, 8, 11, 12
<i>State v. Kinard</i> , 109 Wn. App. 428, 36 P.2d 573 (2001)	8, 15
<i>State v. Knight</i> , 46 Wn. App. 57, 729 P.2d 645 (1986).....	9, 16
<i>State v. Linares</i> , 98 Wn. App. 397, 989 P.2d 591 (1999)	7, 9
<i>State v. Moon</i> , 48 Wn. App. 647, 739 P.2d 1157 (1987)	8, 15
<i>State v. Sanford</i> , 128 Wn. App. 280, 115 P.3d 368 (2005).....	15
<i>State v. Stenson</i> , 132 Wn.2d 668, 940 P.2d 1239 (1997).....	15
<i>State v. Vaughn</i> , 101 Wn.2d 604, 682 P.2d 878 (1984).....	11
<i>State v. Weddell</i> , 29 Wn. App. 461, 629 P.2d 912 (1981).....	8

Federal and Other Jurisdictions

<i>Manson v. Brathwaite</i> , 432 U.S. 98, 114, 97 S. Ct. 2243, 53 L. Ed.2d 140 (1977)	7, 12, 15, 17
<i>Simmons v. United States</i> , 390 U.S. 377, 384, 88 S. Ct. 967, 19 L. Ed.2d 1247 (1968)	7, 8, 9, 10, 11, 12

A. ISSUES PERTAINING TO APPELLANT'S ASSIGNMENTS OF ERROR.

1. Did the trial court properly exercise its discretion in admitting photomontage identification of defendant when it was not impermissibly suggestive, there is not a substantial likelihood of irreparable misidentification, and the victim's in-court identification of defendant as the burglar would have been enough to convict defendant.

B. STATEMENT OF THE CASE.

1. PROCEDURE

Terry Lee Russell, Jr., hereinafter "defendant" was charged with one count of residential burglary. CP 3. As part of defendant's motions in limine he moved to exclude from evidence identification from a photomontage and to exclude in-court identification. CP 17-19 at #3. The State provided the Court with a Memorandum of Authorities regarding the admissibility of the photomontage. CP 41-47. The court denied defendant's motion in limine #3, stating,

The photomontage is clearly admissible. I mean montages under the case law are used. The fact that there may be cross-examination potential because of this other photograph and the fact that Ms. Pederson is alleged to

have not been able to clearly identify the Facebook photograph as Defendant, all of that, the testimony and the evidence, comes in based on what she testifies to, what she's asked about.

But to say per se photomontage identifications are not admissible is simply wrong. I will allow the evidence of the montage and Ms. Pederson's selection apparently of the Defendant [sic] from the five photographs presented, and we'll go from there.

2RP 21.¹

Following trial defendant was convicted as charged. CP 75; 5RP 3.

He was sentenced on this case to nine months confinement and twelve months community custody. CP 86-98; 6RP 18.² Defendant timely appealed.

2. FACTS

On February 1, 2016, at approximately 11:40 AM, Lindsay Pederson returned to her father's house where she was living after visiting her mother in Seattle. 3RP 12-13. Lindsay³ parked in her normal parking spot to the left of the house. 3RP 13. When she pulled in nobody was home as her father and stepmother were at work and her brother was at school. *Id.* After pulling in and being on her phone for a few minutes she

¹ The verbatim reports of proceedings are contained in eight volumes. The six volumes as related to trial and relevant here are designated as "#RP" and have separate pagination.

² While defendant was sentenced at the same hearing on a second, unrelated case to which he had pleaded guilty, such is not relevant nor challenged for his present appeal.

³ Because Ms. Pederson shares the same last name with her father, Eric Pederson, they will be referred to by first name to avoid confusion. No disrespect is intended.

decided to go to a 7-Eleven located about a minute or so away to get some snacks. *Id.* When she was driving down the street she noticed a Toyota van coming her way. 3RP 15. Because the street is too narrow for two cars to pass each other at the same time the van moved out of the way to let Lindsay through. 3RP 14-15. She waved at them to say “thank you” and noticed two people in the front seat. 3RP 15. After buying Gatorade and maybe some candy at 7-Eleven she went straight back home by the same route she took to get to the store. 3RP 15-16.

When Lindsay arrived home, she noticed the same van in her dad’s parking spot. 3RP 16. She thought it was a little bit unusual for them to be parked there, but her first assumption was they were at the neighbor’s house. *Id.* She noticed the van was running but did not look inside the van because she just wanted to get inside the house so she proceeded straight to the front door. 3RP 16-17. As Lindsay got to the front door, she could tell it was locked. 3RP 17. But when she looked through the door’s window she could see the back French doors were ajar. *Id.* It was unusual for the French doors to be ajar when nobody is home as the family locks their doors. 3RP 18. After unlocking the front door, she immediately went to look at the back doors. *Id.* She noticed right away that one of the doors was shattered and was the door which was open. 3RP 19. The hole in the glass was directly above the door handle. *Id.*

After seeing the damage she was shocked. Almost immediately she heard footsteps upstairs. 3RP 21. Lindsay said, “hello” and could hear the footsteps picking up the pace. *Id.* She said, “hello” again, but only heard more footsteps and no response. *Id.* Starting to get scared she went out the front door to get back to her car. *Id.*

When Lindsay got outside to the end of the front porch a man, later identified as defendant, jumped off the roof and landed right in front of her. 3RP 22. He landed on his side directly facing Lindsay and looked at her. *Id.* Defendant immediately bolted to the van. *Id.* It was later determined he had removed a screen on her stepbrother’s window and jumped off the roof from that room. 3RP 22-23. Lindsay was able to identify what defendant was wearing, his height, and hair color. 3RP 23. He scrambled into the driver’s seat of the van and started to drive away. 3RP 24. Lindsay took out her phone and began taking pictures of the van. *Id.* She saw that it had no license plate. 3RP 25. Due to the glare the pictures could not get a clear look at defendant’s face as he was driving the van. *Id.* However, she got a clear look at both the driver and passenger. 3RP 64. The van crashed into a neighbor’s car before backing all the way down the street and escaping from the neighborhood. *Id.* Lindsay went to her neighbor’s house and called the police and her father. 3RP 26.

When her father, Eric Pederson, got home the two of them checked the house to make sure everything was there. 3RP 28. The only room disturbed was the master bedroom. *Id.* The belongings normally kept in Lindsay's stepmother's side table were all over the bed. This included papers and all the jewelry. *Id.* The dresser doors were open, but otherwise had not been rifled through. 3RP 30.

While Lindsay and Eric were waiting for the police to arrive, Eric suggested Lindsay post the pictures she took on Facebook to get them out to her Tacoma friends in case they knew something about the burglary or could help them figure out who committed the crime. 3RP 31. Lindsay posted the pictures and made statements regarding the perpetrators needing to be put away, that they had something coming to them, and they weren't going to get away with what they did. 3RP 52-53. An individual contacted her within a day or two about the burglary. 3RP 31-32. He sent her a picture and asked her if the person in the photo was the same person who committed the burglary. *Id.* Her gut instinct right away was the person in the picture was the man who committed the burglary. *Id.*

On February 25, Lindsay was contacted by Detective Chris Coulter of the Tacoma Police Department. 3RP 33. Lindsay went down to the police station to meet with Detective Coulter. *Id.* At the police station Lindsay looked at a photomontage lineup to attempt to identify the

perpetrator of the crime. 3RP 33-34. The photomontage lineup had an admonition Lindsay was required to sign, stating:

You are about to view a group of photos for the purpose of identifying a suspect in a crime. The fact that the photographs are shown to you should not influence your judgment. This group of photographs may or may not include a photograph of the person who committed this crime. Therefore, you should not conclude or guess. You are not obligated to identify anyone. Keep in mind that a photograph may or may not depict the current appearance of the person who committed the crime since the people can change their appearance in numerous ways. Also photographs do not always show the true complexion of a person who could be lighter or darker than shown. Finally, please do not discuss this case with other witnesses, nor indicate in any way that you have or have not identified anyone.

3RP 42-43; Exh. 12.

After signing the admonition form Lindsay looked at six pictures contained on a photo lineup. 3RP 43; Exh. 13. She spent time looking at the photographs, but was able to cancel out numbers three through six immediately. 3RP 43-44. She ultimately chose picture one as the individual who committed the burglary after looking at it for no more than one minute. 3RP 43-44, 55; Exh. 13. She was 100% positive that the individual in picture number one was the burglar. 3RP 44-45; Exh. 12. Lindsay went into the photomontage trying to have a clear mind and make her decision, if any, based on what she had seen in real life, not based on a Facebook picture. 3RP 58. In fact, Lindsay had not looked at the picture

since the incident happened. 3RP 65. But she knew that if she ever saw the burglar again she would recognize him. 3RP 61. She further identified defendant in-court as the same person she saw fall off the roof. 3RP 45.

C. ARGUMENT.

1. THE PHOTOGRAPHIC IDENTIFICATION OF DEFENDANT MEETS DUE PROCESS REQUIREMENTS AS THE PROCEDURE USED WAS NOT SUGGESTIVE AND IT DID NOT GIVE RISE TO A SUBSTANTIAL LIKELIHOOD OF IRREPARABLE MISIDENTIFICATION.

An appellate court determines the admissibility of photomontage identifications by examining the procedures used to determine whether, under the totality of the circumstances, the photomontage was so impermissibly suggestive as to give rise to a substantial likelihood of irreparable misidentification. *Simmons v. United States*, 390 U.S. 377, 384, 88 S. Ct. 967, 19 L. Ed.2d 1247 (1968); *State v. Hanson*, 46 Wn. App. 656, 664, 731 P.2d 1140 (1987). Reliability is the key factor in determining the admissibility of photomontage identifications. *Manson v. Brathwaite*, 432 U.S. 98, 114, 97 S. Ct. 2243, 53 L. Ed.2d 140 (1977); *Hanson*, 46 Wn. App. at 664. If the defendant cannot show that the identification procedure is suggestive, then there is no due process violation and the inquiry ends. *State v. Linares*, 98 Wn. App. 397, 401, 989 P.2d 591 (1999). If, and only if, the identification procedure is

suggestive, then the court must continue its inquiry into reliability and the relevant factors to determine if there is a substantial likelihood of irreparable misidentification. *Id.* This essentially creates a two-part test: (1) was the confrontation procedure suggestive; and (2) under the totality of the circumstances was the identification reliable even if the confrontation procedure was suggestive. *State v. Moon*, 48 Wn. App. 647, 650, 739 P.2d 1157 (1987).

The admission of a photomontage or other form of photo identification is reviewed for abuse of discretion. *State v. Kinard*, 109 Wn. App. 428, 432, 36 P.3d 573 (2001).

- a. The identification procedure used was not suggestive.

In determining whether a photomontage procedure is suggestive, a court should consider (1) whether other photographs in the montage resemble the description provided by the witness; (2) if one picture was emphasized; and (3) whether the witness believed the police have other evidence that one of the persons pictured committed the crime. *Simmons*, 390 U.S. 383-384. Our courts have also found these factors can include situations where only the picture of a single individual was shown. *State v. Weddell*, 29 Wn. App. 461, 474, 629 P.2d 912 (1981). These factors are weighed against the corrupting effect of any suggestive aspects of the identification. *Hanson*, 46 Wn. App. at 664. An impermissibly suggestive

photomontage is “one that directs undue attention to a particular photo.” *State v. Linares*, 98 Wn. App. 397, 403, 989 P.2d 591 (1999) (quoting *State v. Eacret*, 98 Wn. App. 282, 283, 971 P.2d 109 (1999)). This Court has found the *Simmons* factors to have no application in pretrial photographic identification procedures engaged in by private citizens. *State v. Knight*, 46 Wn. App. 57, 59, 729 P.2d 645 (1986).

There was nothing here to suggest the photomontage shown to Lindsay was impermissibly suggestive. As an initial matter, the photograph she first saw of defendant after her Facebook post was from a private citizen. 3RP 31. This means the *Simmons* factors would not apply. *Knight*, 46 Wn. App. at 59. Thus, the identification procedure used was not suggestive. Therefore, this Court should affirm defendant’s conviction.

But even if the *Simmons* factors did apply, they would not be met here to support a claim that the photomontage was impermissibly suggestive. First, any differences between defendant’s photograph and the others was minimal. While some had facial hair and others did not, Lindsay thought they all looked very similar in age. 3RP 58. When considering the facial hair, she tried to imagine her final two choices without a mustache based on the photo lineup admonition. 3RP 59. In making her final decision she felt that two of the subjects both had light eyes, similar hair color, and in general “look[ed] kind of similar.” *Id.* The

similarities between the photographs shows that they were chosen based on the appearance of whom Lindsay saw jump off the roof. The first *Simmons* factor is not met.

Second, this is not a situation where Lindsay saw only one photograph or was limited in her choices. The photomontage contained six photographs. 3RP 58, 104; Exh. 13. There is nothing in the record to show that only one picture was used or if defendant's picture was emphasized over another. If anything, the opposite is true. Detective Coulter testified how she told Lindsay to "take her time." 3RP 105. She provided Lindsay with no other information about any of the photographs or defendant after Lindsay independently selected his photograph as being the burglar. *Id.* Defendant cannot show how one picture was emphasized over another.

Finally, there is nothing in the record to show that the police told Lindsay they had other evidence defendant committed the charged crime. Defendant's motions in limine make no reference to Lindsay knowing defendant had committed, or was even suspected of committing, other crimes. CP 17-19. The only such information contained in the motions in limine is a single sentence stating that Lindsay received the photograph by a third party who has a neighborhood watch Facebook page. CP 17-19 at #3. The only other reference to Lindsay having such information is a quote from defense counsel during argument on excluding the photomontage

where she states that the Facebook photo was "...sent from this neighborhood watch guy - - I mean it was sent in the context of, 'This guy probably committed other crimes. It looks like he's the same guy who did it to yours.'" 2RP 11-12. There is nothing in the record to support defense counsel's contention about Lindsay knowing police suspected defendant in particular of committing this crime. Rather, all the record shows is an unsupported claim from defense counsel of what Lindsay was told by the third party. But even if she was indeed told this information it is still not information she received from the police. It was information she received from a private citizen. This would not meet the third *Simmons* factor as there is nothing to show Lindsay believed the *police* had other evidence defendant committed the crime. Because none of the three *Simmons* factors are met, the procedure used for the photomontage was not suggestive. This Court should affirm defendant's conviction.

- b. Even if the procedure used was suggestive, there is not a substantial likelihood that it would have caused irreparable misidentification of defendant as the burglar.

An identification will only be inadmissible when its reliability is "so questionable that it cannot offset the suggestiveness of the procedures." *Hanson*, 46 Wn. App. at 664. Only in such a case will a court consider the factors regarding irreparable misidentification. *State v. Vaughn*, 101 Wn.2d 604, 610-611, 682 P.2d 878 (1984). The

photomontage must be so impermissibly suggestive as to give rise to a substantial likelihood of irreparable misidentification. *Simmons* 390 U.S. at 384; *Hanson*, 46 Wn. App. at 664. In *Manson v. Brathwaite*, 432 U.S. 98 (1977), the United States Supreme Court noted five factors which should be considered in determining whether a photomontage is impermissibly suggestive to the point of irreparable misidentification: (1) the opportunity of the witness to view the criminal at the time of the crime; (2) the witness's degree of attention; (3) the accuracy of the prior description of the criminal; (4) the level of certainty demonstrated at the confrontation; and (5) the length of time between the crime and the confrontation. *Brathwaite*, 432 U.S. at 114; *Hanson*, 46 Wn. App. at 664.

Here, defendant cannot show that these factors weigh in favor of irreparable misidentification. Lindsay was able to see defendant's face directly when he jumped off the roof. 3RP 64. After defendant jumped off the roof he landed on his side right in front of Lindsay and looked at her. 3RP 22. Lindsay in return was looking directly at him. 3RP 64. She had an unobstructed view of defendant's face. *Id.* She then saw him clearly in the driver's seat of the van. *Id.* Even if she only saw him for one to two seconds prior to him entering the van, this was an unforgettable event for Lindsay. 3RP 62. This was the only time anything like this had ever happened to her and the incident stuck in her mind as a result. *Id.* She had

an ample opportunity to view defendant at the time of the crime and she remembered such due to its uniqueness in her life.

Similarly, she was quite attentive during the whole incident. She not only paid attention to defendant's appearance when he jumped off the roof, but also was attentive and appeared to follow all directions during the photomontage. 3RP 22, 64, 105. She paid attention to facial features and to both defendant and the passenger in the van in hopes of identifying them. 3RP 64. Lindsay made sure to pay attention so she could identify defendant and his accomplice in the future. *Id.*

Third, her description of the burglar compared to defendant is relatively accurate. Lindsay thought the burglar was in his early 20s with brownish hair. 3RP 50. In the photomontage Lindsay believed the photograph of defendant most closely matched in age the description she provided, but that they all looked similar in age, which could have ranged from their 20s to their 40s. 3RP 58. She also believed the two final photographs she considered had light eyes and similar hair color. These similarities do not run the risk of irreparable misidentification.

Lindsay was also extremely certain of her identification of defendant as the burglar. In her narrative given to the police after the photomontage she made clear she was "100 percent positive" defendant was the burglar. 3RP 44-45; Exh 12. She explained that while she used

terms such as “best guess” and “pretty positive” in identifying defendant as the burglar, she also made clear that she made an “accurate decision” based on her knowledge. 3RP 71. Lindsay also made clear how when she made her choice during the photomontage it was based solely on remembering what she saw in real life, not based on the Facebook picture. 3RP 58. If she did not believe the person she selected in the photomontage was the burglar, she would not have chosen him. 3RP 74. Throughout the entire process, Lindsay was extremely certain as to defendant’s identity as the burglar.

The time between the crime and the photomontage was relatively short and occurred when Lindsay was able to clearly remember the events. The photomontage occurred on February 25, 2016. 3RP 33. This was a period of about three weeks after the burglary happened. 3RP 56. Even with a three-week gap between the crime and identification, Lindsay based her decision solely on the person she saw at her house. 3RP 66. She remembered the events of February 1 and was able to recall them for the photomontage. *Id.* She remembered defendant’s face as the burglar because it was the only time anything like this happened to her. 3RP 62. A three-week gap would not change this, particularly since she remembered defendant clearly as the burglar in court nearly two years later. 3RP 45.

The length of time between the crime and photomontage would not lead to irreparable misidentification.

Defendant cannot show how any of the five *Braithwaite* factors are met. As such, this Court should affirm defendant's conviction.

- c. If the photomontage's admission was error, such still would not have affected the verdict as Lindsay identified defendant in court as the individual who fell off the roof based on memories independent of the photomontage.

In-court testimony is what is material to the point where even when an out-of-court identification is suggestive, a valid in-court identification is still valid so long as it is properly admissible. *State v. Moon*, 48 Wn. App. 647, 651, 739 P.2d 1157 (1987). Evidentiary errors not of constitutional magnitude requires reversal only if the error, within reasonable probability, materially affected the outcome of the trial. *State v. Stenson*, 132 Wn.2d 668, 709, 940 P.2d 1239 (1997). Improper admission of evidence is harmless if the evidence is of minor significance in reference to the overall, overwhelming evidence as a whole. *State v. Sanford*, 128 Wn. App. 280, 287-288, 115 P.3d 368 (2005). The admission of a photomontage or other form of photo identification is essentially the admission of evidence. *State v. Kinard*, 109 Wn. App. 428, 432, 36 P.2d 573 (2001).

State v. Knight, 46 Wn. App. 57, 729 P.2d 645 (1986) is factually comparable to the present case. There, the victim of a theft was told by two twelve-year-old boys that they had seen the theft occur. *Knight*, 46 Wn. App. at 58. After giving a description of the culprit to the victim, the victim showed them a picture of defendant. *Knight*, 46 Wn. App. at 59. Upon seeing the picture of defendant, one of the boys said defendant was whom he saw commit the theft. *Id.* The same boy later picked defendant's photo out of a police photomontage and positively identified the same individual in court. *Id.* This Court found that the reliability of the testimony and its accuracy was a factual question for the jury. *Knight*, Wn. App. at 60. As such, there was no error by its admission. *Id.*

Here, while the photomontage was used throughout the trial, it is of minor significance when compared to the trial as a whole, particularly considering Lindsay's independent recollection of defendant and in-court identification. Lindsay identified defendant in-court based solely on her memory of the events of February 1. 3RP 45. When asked if she saw the individual who fell of the roof of the house in the courtroom, she identified defendant. *Id.* She was not asked if the individual she saw in the photomontage was in the courtroom. She was only asked if the individual who fell off the roof was in the courtroom. *Id.* This is similar to the facts in *Knight*. Just like there, a witness here was able to identify defendant

based solely on his in-court appearance. Such an identification had nothing to do with the photograph shown prior to the photomontage occurring. This valid in-court identification is still enough for a jury to find that defendant was the burglar who Lindsay saw fall off the roof independent of the photomontage. Even without the photomontage, Lindsay's testimony of what she saw, who the burglar was, and identifying him in court is enough to convict defendant. The reliability of Lindsay's memory and recollection capabilities were a factual question for the jury. By convicting defendant, the jury clearly found her memory was reliable and identification of defendant as the burglar was accurate. Hence, even if the photomontage is invalid, this Court should still affirm defendant's conviction.

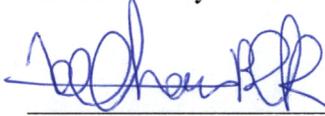
D. CONCLUSION.

The trial court did not abuse its discretion by the admission of the photomontage. The montage was not suggestive. Seeing a picture sent by a private civilian prior to a police photomontage occurring is not suggestive. Even if it was suggestive, there was not the fear of irreparable misidentification as the *Brathwaite* factors are not met. Regardless,

because of the successful in-court identification of defendant as the burglar based solely on independent memory, even if the photomontage was admitted in error, there is still enough evidence to convict defendant. For the aforementioned reasons, this Court should affirm defendant's conviction.

DATED: November 19, 2018.

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The undersigned certifies that on this day she delivered by U.S. mail or ABC-LMI delivery to the attorney of record for the appellant and appellant c/o his attorney true and correct copies of the document to which this certificate is attached. This statement is certified to be true and correct under penalty of perjury of the laws of the State of Washington. Signed at Tacoma, Washington, on the date below.

11.20.18 

Date Signature

PIERCE COUNTY PROSECUTING ATTORNEY

November 20, 2018 - 9:30 AM

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Appellate Court Case Title: State of Washington, Respondent v Terry Lee Russell, Jr., Appellant
Superior Court Case Number: 16-1-04077-4

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