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THE COURT OF APPEALS FOR THE STATE OF WASHINGTON
DIVISION II

STATE OF WASHINGTON,

Respondent,

vs.

ETHAN ERWIN,

Appellant.

Appeal from the Juvenile Division, Superior Court of Washington for
Lewis County

Respondent's Brief

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I. ISSUES

- A. Did the trial court err when it admitted Erwin's statements to Chief Salyers, and if so, was the error harmless?
- B. What is the appropriate remedy for the trial court's failure to enter findings of fact and conclusions of law following the fact finding as required by the court rule?
- C. Is the trial court's failure to enter findings of fact and conclusions of law following the CrR 3.5 hearing harmless due to the State's concession?

II. STATEMENT OF THE CASE

On January 31, 2018, D.S.¹ was in his third period math class at Napavine Middle School with Erwin. RP 6-8. D.S. is in the eighth grade. RP 6. D.S. heard Erwin state he was going to shoot the school, "like shoot up the school." RP 8. Another student, C.W., was present when the statement was made. RP 8, 13.

C.W. heard Erwin state "[t]hat there was going to be a school shooting tomorrow." RP 13. C.W. and Erwin were having a conversation prior to Erwin's statement. RP 14-15. C.W. had told Erwin that Erwin would not be coming over to C.W.'s house due to the kind of person Erwin was, C.W. did not want Erwin at his house. RP 14-15. After Erwin made the statement about shooting up the

¹ The State will refer to juvenile witnesses by their initials. The Appellant never filed the necessary motion to have his initials used pursuant to, .260, .270, or GR 15. A letter was sent on April 6, 2018 informing counsel that Erwin's full name would be used in these appellate proceedings without an order sealing the record.

school, C.W. told the math teacher, Mr. Terry. RP 15-16. C.W. told Mr. Terry because Erwin's statement concerned C.W. and he was afraid Erwin could harm C.W. or a friend. RP 17.

Jason Prather is the principal of the Napavine High School/Middle School in Lewis County. RP 21. A teacher reported to Mr. Prather that Erwin had threatened to shoot up the school. RP 22-23. The statement coming from any person would cause Mr. Prather concern, as he is responsible for the safety of 350 students and more staff at the school. RP 23. Erwin had disciplinary issues and trouble relating to other students, including slapping and poking students, he brought a knife to school the previous year, and disrespected staff and students. RP 23. There was also an incident where Erwin had thrown blood on another student. RP 24.

Mr. Prather brought Erwin into his office and asked Erwin if he had made any kind of threatening statements, which Erwin denied. RP 24. Mr. Prather also interviewed two other witnesses, then called law enforcement. RP 24. Mr. Prather contacted law enforcement due to his concern about Erwin's threatening statements. RP 24.

Napavine Police Chief Salyers responded to Napavine High School/Middle School regarding Erwin's threat to shoot up the

school RP 25-27. Chief Salyers spoke with C.W., D.S., and Mr. Prather. RP 27. C.W. and D.S. confirmed Erwin made the threatening statements. RP 27-28. Chief Salyers spoke to Erwin briefly in Mr. Prather's office. RP 28. It was a short conversation, Erwin was quiet, admitted to making the statement, but qualified them as not serious, he actually was joking. RP 28. Erwin did admit he had access to guns in his household. RP 37.

The State charged Erwin with one count of Harassment – Threat to Kill. CP 3-4. Erwin was found guilty as charged after a fact finding on March 13, 2018. RP 1-72. A contemporaneous CrR 3.5 hearing was held. RP 4. Erwin was sentenced to 30 days, credit for time served, 12 months of supervision, and 33 hours of community service. CP 67. Any additional time served beyond the 30 days would count towards the community service. *Id.*

Findings of Fact and Conclusions of Law were scheduled to be entered on March 20, 2018, but the hearing actually occurred on March 27, 2018. RP 69-73. The State appeared prepared to enter the Findings of Fact and Conclusions of Law but Erwin's counsel had objections to some of the findings, therefore, the trial court told the parties the matter would need to specially set. RP 73-74. Erwin timely appeals. CP 16.

The State will supplement the facts as necessary throughout its argument below.

III. ARGUMENT

A. THE TRIAL COURT ERRED WHEN IT ADMITTED ERWIN'S STATEMENTS TO CHIEF SALYERS, BUT ANY ERROR WAS HARMLESS.

The trial court improperly admitted Erwin's statements to Chief Salyers. The State concedes Erwin's statements were made in response to a custodial interrogation where *Miranda*² had not been given. Contrary to Erwin's assertion, the admission of his statements do not require reversal, as they are harmless.

1. Standard Of Review.

The ultimate determination of whether a defendant underwent a custodial interrogation is one of law and is reviewed de novo. *State v. Lorenz*, 152 Wn.2d 22, 36, 93 P.3d 133 (2004).

2. The Trial Court Incorrectly Ruled Erwin's Statements To Chief Salyers Were Admissible, As Erwin Was In Custody And Was Not Informed Of His *Mirada* Warnings.

The Fifth Amendment³ right to counsel attaches when a person is subject to (1) custodial (2) interrogation (3) by a state agent. *State v. Templeton*, 148 Wn.2d 193, 207-8, 59 P.3d 632

² *Miranda v. Arizona*, 384 U.S. 436, 86 S. Ct. 1602, 16 L. Ed. 2d 694 (1966).

³ U.S. Const., amend. V

(2002); *State v. Post*, 118 Wn.2d 596, 605-6, 826 P.2d 172 (1992).

The *Miranda* rule only applies when a state agent interrogates a person who is in custody:

A suspect's Fifth Amendment privilege against self-incrimination and the corresponding right to be informed attaches when "custodial interrogation" begins. A "custodial interrogation" which requires law enforcement officers to administer *Miranda* warnings to a suspect is defined as questioning initiated by the officers after a person is taken into custody. Generally, in defining custody the Supreme Court has looked at the circumstances surrounding the interrogation and whether a reasonable person would have felt that person was not at liberty to terminate interrogation and leave.

Templeton, 148 Wn.2d at 208 (footnotes omitted); see also *Miranda v. Arizona*, 384 U.S. 436⁴.

The Court developed *Miranda* warnings to ensure while a defendant is in the coercive environment of police custody his or her right not to make incriminating confessions is protected. *State v. Harris*, 106 Wn.2d 784, 789, 725 P.2d 975 (1986), *cert. denied*, 480 U.S. 940, 107 S. Ct. 1592, 94 L.Ed.2d 781 (1987). A person cannot invoke their Fifth Amendment right to counsel if that person is not in custody. *State v. Warness*, 77 Wn. App. 636, 641, 893 P.2d 665 (1995).

⁴ "By custodial interrogation, we mean questioning initiated by law enforcement officers after a person has been taken into custody or otherwise deprived of his freedom of action in any significant way."

A police officer does not seize a person by simply striking up a conversation or asking questions. *Florida v. Bostik*, 501 U.S. 429, 111 S. Ct. 2382, 115 L. Ed.2d 389 (1991); *State v. Mennegar*, 114 Wn.2d 304, 310, 787 P.2d 1347 (1990). Nor is there a seizure where the conversation between citizen and officer is freely and voluntarily conducted. *State v. Mennegar*, 114 Wn.2d at 310. Where an officer commands a person to halt or demands information from the person, a seizure occurs. *State v. O'Neill*, 148 Wn.2d 564, 577, 62 P.3d 489 (2003). But, no seizure occurs where an officer approaches an individual in public and requests to talk to him or her, engages in conversation, or requests identification, so long as the person involved need not answer and may walk away. *Id.* at 577-8.

When determining whether *Miranda* warnings are required, the United States Supreme Court ruled an officer's unarticulated plan to detain or arrest a suspect is irrelevant; the only relevant inquiry is how a reasonable person in the suspect's position would have understood the situation. *Berkemar v. McCarty*, 468 U.S. 420, 442, 104 S. Ct. 3138, 82 L.Ed.2d 317 (1984). The Washington State Supreme Court specifically rejected the contention that police must inform a suspect of *Miranda* warnings once probable cause to

arrest exists, adopting the *Berkemer* test in *State v. Harris*.⁵ See also *State v. Short*, 113 Wn.2d 35, 40-41, 775 P. 2d 458 (1989)⁶; *State v. McWatters*, 63 Wn. App. 911, 915, 822 P.2d 787 (1992)⁷; *State v. D.R.*, 84 Wn. App. 832, 836, 930 P.2d 350 (1997).

Juveniles have the same rights as adults against self-incrimination. RCW 13.40.140(8). Therefore, if police illegally obtained statements from a juvenile they are subject to be suppressed by the trial court and any evidence flowing from those statements could be suppressed. RCW 13.40.140(8); *State v. D.R.*, 84 Wn. App. 832, 838-39, 930 P.2d 350 (1997).

In *D.R.* the Court of Appeals discussed an Oregon case, *State ex re. Juvenile Dep't v. Killitz*, 59 Ore. App. 720, 651 P.2d 1392 (1982). *D.R.*, 84 Wn. App. at 836-37.

[A] junior high school student was summoned to the principal's office, where an armed, uniformed police officer questioned him in the presence of the school principal. Neither the officer nor the principal "said or did anything to dispel the clear impression communicated to defendant that he was not free to leave." Because the student would have been subject to the usual school disciplinary measures if he had not come to the office, and did not know that he would

⁵ *State v. Harris*, 106 Wn.2d at 789-90.

⁶ The existence of probable cause is not a factor to be considered in the determination of custody; the sole inquiry has become whether the suspect reasonably supposed his freedom of action was curtailed.

⁷ Probable cause to arrest does not give rise to *Miranda* requirements; the existence of probable cause to arrest has no bearing on whether a suspect is in custody at the time he or she makes any statement to law enforcement officers.

be questioned by a police officer, the court found he did not come to the office voluntarily. The court concluded the interrogation was custodial.

Id., citing *Killitz*, 651 P.2d at 1383-84. *D.R.* then discussed a second Oregon case, *Loredo*:

[A] junior high school student similarly was summoned to appear at the principal's office, where he was interviewed alone by a plainclothes police officer whose gun was hidden from view. The officer showed the child his badge and asked if he could talk with him. *Id.* The officer told the child he was not under arrest, could leave if he wanted to, and did not have to answer questions.

Id. at 837, citing to *State ex. re. Juvenile Dep't v. Loredo*, 125 Ore. App. 390, 865 P.2d 1312 (1993).

In *Loredo* the Oregon Courts found *Miranda* was not required because the officer had informed the juvenile did not have to speak to the officer, he was not under arrest, and made it clear he could leave. *Id.* Further, because the officer was in plain clothes and in a familiar environment to the juvenile it added to the noncoercive nature of the interaction. *Id.*

In *D.R.* the Court of Appeals found the juvenile was in custody because the police officer failed to 1) fail to inform the juvenile he was free to leave, 2) the juvenile's youth, 3) "the naturally coercive nature of the school and assistant principal's office for children his age," which was 14 years old, and 4) "the

obvious accusatory nature of the interrogation.” *D.R.*, 84 Wn. App. at 838. The detective in *D.R.* was in plain clothes, with no gun visible, when he spoke to D.R. in the principal’s office with the assistant principal present. *Id.* at 834. D.R. was summoned to the assistant principal’s office, where the detective showed his badge, told D.R. he did not have to answer questions, but failed to tell D.R. he could leave. *Id.* This was found to be a custodial interrogation. *Id.* at 838.

The State concedes Erwin’s facts are more egregious than *D.R.* Erwin was summoned to the principal’s office by the principal. RP 39-41. Mr. Prather acknowledged Erwin was not free to leave the office area until his investigation was complete. RP 42-43. Therefore, Erwin was restricted and not free to leave, in a coercive environment when Chief Salyers and Mr. Prather were in the principal’s office with Erwin. RP 34-35. The door was shut, Chief Salyers was standing, Erwin was not told he was free to leave, and *Miranda* was not given. RP 31, 33-35. Any statements elicited from Erwin from Chief Salyers was a result of custodial interrogation and should have been suppressed and not admitted as part of the fact finding. The trial court found Erwin was not in custody. RP 37. The

trial court ruled Erwin's statements to Chief Salyers were admissible. RP 37. The trial court's ruling was erroneous.

3. The Admission Of Erwin's Statements To Chief Salyers Was Harmless.

Improperly admitted statements of a defendant in violation of his or her *Miranda* rights does not warrant automatic reversal of the conviction. *D.R.*, 84 Wn. App. at 838. "A court's error in admitting a defendant's statements in violation of *Miranda* is harmless only if the untainted evidence alone is so overwhelming that it necessarily leads to a finding of guilty." *Id.* (internal quotations and citation omitted). Erwin argues once this Court excises out Erwin's admission to Chief Salyers his conviction must be reversed because the testimony of D.S. and C.W. is not sufficient to meet the overwhelming evidence of guilty requirement. Brief of Appellant at 13. Erwin is incorrect.

Chief Salyers' testimony regarding Erwin's statements consisted of, "He confirmed the statements were made and basically said that he didn't take them serious and he was just kind of joking." RP 26. Erwin never told Chief Salyers what he said, Erwin only confirmed what Chief Salyers stated other people said Erwin had said. RP 29-30. There was also a discussion regarding if there was access to firearms in the house. RP 37.

The entirety of the testimony regarding the threats and how people took them, with the exception of Erwin confirming to Chief Salyers he made the statement (but according to Erwin, it was a joke), came from C.W., D.S., and Mr. Prather. Both boys heard Erwin state he would shoot the school or shoot up the school. RP 8, 13. While, D.S. may not have been fearful, he heard what Erwin stated. RP 8. C.W. took the threat seriously. 13, 15-17. C.W. told Mr. Terry, the math teacher, what Erwin said because the statement concerned C.W., and he was afraid Erwin could harm C.W. or a friend. RP 17.

Mr. Prather was concerned once he was informed about Erwin's threat. RP 22-23. Erwin had a history of having trouble with other students, had previously brought a knife to school, and had disciplinary issues. RP 23. Mr. Prather was the one who called law enforcement due to his level of concern. RP 24.

The State had to prove the crime of Harassment – Threat to Kill, or Felony Harassment, requires the State to prove Erwin, without lawful authority, knowingly threatened immediately, or in the future to kill the person threatened or any other person. RCW 9A.46.020(2)(b)(ii). Further the State had to prove Erwin, “by words or conduct places the person threatened in reasonable fear that the

threat will be carried out.” RCW 9A.46.020(1)(b). The evidence outlined above is sufficient to meet the State’s burden for evidence so overwhelming it necessarily leads to a finding of guilty for Harassment – Threat to Kill. Erwin threatened to shoot up the school, as testified to by C.W. and D.S. This threat was also communicated to Mr. Terry and Mr. Prather. C.W. and Mr. Prather were put in reasonable fear the threat would be carried out. This Court should affirm Erwin’s conviction because the trial court’s error in admitting Erwin’s statements was harmless.

B. FAILURE TO ENTER FINDINGS OF FACT AND CONCLUSIONS OF LAW FOR THE FACT FINDING.

The trial court is required to enter findings of fact and conclusions of law following a fact finding in juvenile court if the case is appealed. This did not occur in Erwin’s case. The proper remedy is to remand for entry of findings.

After the trial court receives a notice of appeal in a juvenile case it is required to enter findings of fact and conclusions of law within 21 days. JuCR 7.11(d).

The court shall enter written findings and conclusions in a case that is appealed. The findings shall state the ultimate facts as to each element of the crime and the evidence upon which the court relied in reaching its decision. The findings and conclusions may be entered after the notice of appeal is filed. The prosecution must submit such findings and

conclusions within 21 days after receiving the juvenile's notice of appeal.

JuCR 7.11 (d). This did not occur in Erwin's case.

The State appeared at a March 27, 2018 hearing prepared to enter findings of fact and conclusions of law. RP 73. The deputy prosecutor who was appearing at presentation was not the Prosecutor who tried the case. RP 1. The State was informed the case would need to be specially set due to the change in the calendar judge. RP 73. The parties were asked to contact the Superior Court Administrator and specially set the hearing and provide proposed findings to the trial judge. RP 74.⁸

The reason written findings of fact and conclusions of law are entered is they facilitate appellate review as they enable an appellant to focus on the issues contained within the record and

⁸ The State submitted a motion to this Court to supplement the record with findings of fact and conclusions of law on September 7, 2018. The Court gave Erwin's counsel until 9/20/18 to respond. This brief is due 9/24/18, therefore, the State must respond prior to the determination of the motion.

That being said, in response to Erwin's footnote 6, the undersigned counsel acknowledges findings and conclusions were not entered until 8/20/18. While Erwin's counsel apparently contacted Erwin's trial counsel 7/5/18, he was on vacation. Erwin's counsel then informs this Court he again contacted trial counsel and the prosecutor on 7/17/18, 13 days prior to the due date of his brief, the prosecutor was out of the office. The undersigned deputy prosecuting attorney put in a notice of appearance on this matter on 4/10/18 and was never contacted by Erwin's counsel regarding the missing findings, despite the fact the designation of Clerk's papers were filed on May 7, 2018. The first I became aware of it was when I read Erwin's Opening brief. I immediately set out to rectify the issue, but had to deal with vacation schedules of Erwin's trial counsel and then the trial judge. This matter could have been cured had the undersigned DPA been notified prior to briefing deadline.

whether the findings are actually supported by the record. *State v. Head*, 136 Wn.2d 619, 622-23, 964 P.2d 1187 (1998). *Head* clearly holds reversal and remand for a new trial would only be an appropriate remedy if a defendant can make a showing that the lack of findings and conclusions actually prejudiced him or her. *Id.* at 624-25.

Erwin argues dismissal is the correct remedy for failure to comply with JuCr 7.11(d) when the defendant (respondent) is challenging the sufficiency of the evidence. Brief of Appellant at 15. The cases Erwin cites to supporting dismissal support dismissal where credibility determination are key to issues, such as sufficiency of evidence and a self-defense claim, which are completely in the province of the trial court. See *State v. Naranjo*, 83 Wn. App. 300, 303, 921 P.2d 558 (1996); *State v. McMcreorey*, 70 Wn. App. 103, 115-16, 851 P.2d 1234 (1993).

This case does not hinge on a self-defense claim. Further, Erwin's statements to Chief Salyers should have been suppressed, therefore, all the Court is left with is the testimony from the remaining witnesses, who the trial court clearly found credible. The Court should allow the State to supplement the record, per the

motion that is already pending with this Court. Erwin can do further briefing if requested, including arguing the findings were tailored.

C. FAILURE TO ENTER FINDINGS FOR THE CrR 3.5 IS HARMLESS AS THE STATE CONCEDED THE TRIAL COURT ERRED IN ADMITTING THE STATEMENTS.

CrR 3.5 requires findings of fact and conclusions of law to be entered after the conclusion of a hearing regarding the admissibility of a defendant's statements. No findings of fact and conclusions of law, pursuant to the court rule, were entered in Erwin's case. See RP; CP; CrR 3.5. The State would normally argue the remedy would be to remand for findings, as it did above, but in Erwin's matter the State conceded the trial court erred in admitting Erwin's statements. While findings are technically required, given the State's concession, remanding for entry of findings is moot.

IV. CONCLUSION

The State concedes Erwin's statements to Chief Salyers were in response to a custodial interrogation and failure to give Erwin *Miranda* warnings should have resulted in the suppression of those statements. The failure to suppress Erwin's statements was harmless, as there was overwhelming untainted evidence proving Erwin committed the crime of Harassment – Threat to Kill. This Court should affirm Erwin's conviction. The State acknowledges

findings of fact were not entered as required pursuant to JuCR 7.11(d). The proper remedy is to remand for entry of findings (which has already been entered and pending a motion with this Court). Finally, the failure to enter findings of fact and conclusions of law for the CrR 3.5 hearing is moot due to the State's concession

RESPECTFULLY submitted this 24th day of September, 2018.

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