

FILED
Court of Appeals
Division II
State of Washington
7/6/2018 8:00 AM

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

In re the Personal Restraint Petition of

SHERYL MARTIN,

Petitioner.

PERSONAL RESTRAINT PETITION

Jeffrey Erwin Ellis #17139
Attorney for Ms. Martin
Law Office of Alsept & Ellis
621 SW Morrison St Ste 1025
Portland OR 97205
503.222.9830 (o)
JeffreyErwinEllis@gmail.com

IDENTITY OF PETITIONER

Sheryl J. Martin, a prisoner in the State of Washington, respectfully files this second Personal Restraint Petition (PRP). She is incarcerated on an attempted murder conviction from Clark County (Case No. 07-1-01592-2).

Ms. Martin (DOC # 345252) is currently incarcerated at the Washington Corrections Center for Women in Gig Harbor, Washington.

This is Ms. Martin's second PRP. It is her first PRP filed with counsel.

PROCEDURAL AND FACTUAL HISTORY

Procedural History

Ms. Martin was charged with attempted murder by an Information filed on October 4, 2007. She was tried by a jury. The jury returned a guilty verdict on October 25, 2010. Ms. Martin was sentenced on November 24, 2010. She appealed.

The Washington Court of Appeals affirmed her conviction and sentence. *State v. Martin*, 169 Wash.App. 620, 281 P.3d 315 (2012). The Washington Supreme Court denied review on January 9, 2013. 176 Wash.2d 1005, 297 P.3d 68 (2013). Ms. Martin did not seek certiorari.

Ms. Martin filed a *pro se* PRP on February 24, 2014. The Court of Appeals denied Ms. Martin's request to appoint counsel and dismissed the

petition by a single-judge order entered on November 20, 2014. Ms. Martin then sought discretionary review in the Washington Supreme Court. A Commissioner denied review by a ruling entered on July 13, 2015. Ms. Martin then filed a motion to modify that decision, which was denied by the Court on September 30, 2015.

Facts

On direct appeal, the Court of Appeals summarized the facts as follows:

In the early morning hours of September 8, 2007, Sheryl Martin called 911 and stated that she had shot her husband, Eddie Martin. The shooting occurred shortly after Eddie had told her that he had been having an affair. Sheryl and Eddie had been drinking and smoking marijuana that night in the shop on their property. At approximately 9:00 p.m., Sheryl returned to the main house. Eddie grabbed another beer and went to his pickup to retrieve his cell phone to text his girlfriend. Sheryl observed Eddie and came back, demanding to see his phone. A verbal altercation ensued, during which Eddie told her he was having an affair. Sometime during the altercation, divorce was mentioned, but Eddie testified that they were always fighting, and sometimes divorce became an issue. During this altercation, Sheryl grabbed a fillet knife and the shotgun that was in the shop. Eddie pried the weapons from her hands and Sheryl left the shop. Eddie grabbed another beer and went into the camper to sleep. Sheryl returned to the camper to retrieve a set of keys to the camper. Eddie went to sleep and woke up as he was shot twice in the legs. Eddie saw Sheryl with the 16 gauge shotgun. Eddie recalled Sheryl saying something like, "If I can't have you, nobody can." Sheryl then left the camper. In less than five minutes, Sheryl returned and shot Eddie two more times, hitting both arms.

The State charged Sheryl with attempted murder in the first degree and, in the alternative, assault in the first degree.

The facts relevant to the claim advanced in this petition are set forth in the argument section below.

CLAIM FOR RELIEF

Ms. Martin was Denied Her Constitutional Right to Effective Counsel When Counsel Failed to Communicate a Favorable Plea Offer that Martin Would Have Accepted.

Facts Relevant to Claim

The facts are deceptively simple.

Prior to trial, the State made a written plea offer which it sent to defense counsel. Appendix A. Defense counsel failed to communicate the offer to Ms. Martin. Appendix B-C. There is a reasonable likelihood that Martin would have accepted the offer, if it had been timely communicated. Appendix C. In fact, Martin has appended several declarations stating that she likely would have pleaded guilty if the offer had been communicated.

Ms. Martin assumed that her counsel complied with his ethical and Sixth Amendment obligations, including the duty to communicate all plea offers. After her PRP was completed, she made a public disclosure request to the prosecutor's office and received *for the first time* the uncommunicated plea offer. Assisted by counsel, she then obtained the declaration from

counsel and the supporting declarations from individuals who knew and spoke to her while charges were pending.

Legal Basis for Claim

Ms. Martin claims ineffective assistance of counsel (IAC), which is governed by the standard announced in *Strickland v. Washington*, 466 U.S. 668 (1984). Counsel has a duty to promptly communicate and explain to the defendant all plea offers made by the prosecuting attorney. *Missouri v. Frye*, 566 U.S. 134, 145 (2012). In the plea-bargaining context, counsel must communicate actual offers, discuss tentative plea negotiations, and discuss the strengths and weaknesses of the defendant's case so that the defendant knows what to expect and can make an informed decision on whether to plead guilty. *State v. Edwards*, 171 Wash. App. 379, 394, 294 P.3d 708 (2012).

The declarations attached to this PRP establish at least a prima facie case that counsel failed to communicate a plea offer to Ms. Martin.

To show prejudice from ineffective assistance of counsel where a plea offer has lapsed or been rejected because of counsel's deficient performance, a defendant must demonstrate a reasonable probability she would have accepted the earlier plea offer had they been afforded effective assistance of counsel. To establish prejudice in this instance, it is necessary to show a

reasonable probability that the result of the criminal process would have been more favorable by reason of a plea to a lesser charge or a sentence of less prison time. *Frye*, 566 U.S. at 147.

Once again, Martin has made that showing. The uncommunicated plea offer would have resulted in a more favorable result for Ms. Martin. Moreover, she has set forth competent admissible evidence that she would have accepted the plea offer.

Ms. Martin recognizes that this petition is successive and is filed more than a year after finality. Because she did not have counsel previously, she can easily surmount the successor bar. With regard to timeliness, she relies on the newly discovered evidence exception.

Newly discovered evidence, if the defendant acted with reasonable diligence in discovering the evidence and filing the petition or motion; Newly discovered evidence is a potentially exempt ground for relief. RCW 10.73.100(1); RAP 16.4(c)(3); *In re Pers. Restraint of Lord*, 123 Wash.2d 296, 319-20, 868 P.2d 835 (1994).

The court reviews a claim of newly discovered evidence raised by a personal restraint petition under the same test as newly discovered evidence asserted in a new trial motion. *State v. Williams*, 96 Wash.2d 215, 223, 634 P.2d 868 (1981). To prevail on a claim of newly discovered evidence, a

personal restraint petitioner must show evidence that (1) will probably change the result of the trial, (2) was discovered since the trial, (3) could not have been discovered before trial by the exercise of due diligence, (4) is material, and (5) is not merely cumulative or impeaching. *Id.* If any of these factors is missing, the petitioner is not entitled to relief. *Id.*; *In re Fero*, ___ Wn.2d ___, 409 P.3d 214, 222 (Wash. 2018).

This Court should measure Martin's diligence considering her expectation that counsel complied with his ethical duties and communicated all offers. Like with *Brady* violations, this Court should not fault a defendant for assuming compliance with a basic duty.

CONCLUSION

Ms. Martin respectfully requests that this Court grant her Personal Restraint Petition or remand for an evidentiary hearing.

DATED this 22nd day of May 2018

Respectfully Submitted:

s/Jeffrey Erwin Ellis
Jeffrey Erwin Ellis #17139
Attorney for Ms. Martin
Law Office of Alsept & Ellis
621 SW Morrison St Ste 1025
Portland OR 97205
503.222.9830 (o)
JeffreyErwinEllis@gmail.com



ARTHUR D. CURTIS
PROSECUTING ATTORNEY

CURT WYRICK
CHIEF DEPUTY

DENNIS M. HUNTER
CHIEF CRIMINAL DEPUTY

E. BRONSON POTTER
CHIEF CIVIL DEPUTY

SHARI JENSEN
ADMINISTRATOR

October 6, 2008

David T. McDonald
Attorney at Law
510 SW 3rd Ave, Suite 400
Portland OR 97204

RE: STATE OF WASHINGTON V. SHERYL JEAN MARTIN
Cause No. 07-1-01592-2

Dear Mr. McDonald:

I met with Art Curtis and Dennis Hunter last Monday to discuss this case and the issues that you and I had discussed on September 25. We also discussed the case more generally and decided to make the enclosed plea offer in the case.

Our impression is that this was a premeditated, intentional shooting. Your client's intent can be argued, but we feel that there is a strong inference from the act itself that she intended to kill the victim. Although your client has been a law abiding member of society throughout her life this does not change the fact that she shot her husband four times after finding out he had been unfaithful. The enclosed offer reflects the seriousness of her conduct.

The enclosed offer will expire on Friday, October 24, 2008 at the close of business. Please contact me if you have any questions.

Sincerely,

John P. Fairgrieve
Deputy Prosecuting Attorney

/CC
Enclosure

STATE OF WASHINGTON V. SHERYL JEAN MARTIN - CAUSE NO 07-1-01592-2

CLARK COUNTY PROSECUTING ATTORNEY'S OFFICE OFFER OF SETTLEMENT

TO: DEFENSE ATTORNEY DAVID T. MCDONALD, WSBA #18446

The defendant is charged with the following:

Count	Charge	Score	Range	Enhancement	Total Range
01	ATTEMPTED MURDER IN THE FIRST DEGREE	0	180-240	60	240-300 months
02	ASSAULT IN THE FIRST DEGREE	0	93-123	60	153-183 months

The state makes the following Offer of Settlement. In accepting this offer, the defendant is agreeing to stipulate to its terms, unless otherwise noted. It is based on the accompanying Declaration of Criminal History which the defendant acknowledges is accurate, true and complete and further that the resultant offender score calculations in this offer are correct. This offer may be withdrawn at any time prior to the entry of a guilty plea, or it otherwise expires on: October 24, 2008. It supersedes any previous offer made in this case. Failure of the defendant to declare disputed criminal history or to disclose additional criminal history or to dispute the resultant offender score calculations prior to any plea of guilty constitutes a breach of this agreement by the defendant.

If the defendant pleads guilty to the following, the State will recommend confinement, costs, conditions and supervision as outlined in this offer.

Count	Charge	Score	Range	Enhancement	Total Range
01	DISMISS				
02	ASSAULT IN THE FIRST DEGREE	0	93-123	60	153-183 months

In lieu of a plea, and as a condition precedent, the defendant must waive speedy trial and agree to a delay in setting the trial date, and the state will take the following action:

- Defendant may be referred to the CCPA Diversion Unit for screening on the above charges.
- The State will refer this case for Drug Court screening.

RECOMMENDATION AS TO CONFINEMENT

153 Days Months in Total Confinement, and
 Days Months Partial Confinement [_____ days Work Crew; _____ days Work Release], and
 _____ Days Community Service (Eight (8) hours per day)
 _____ Days with _____ days suspended/deferred on a misdemeanor/gross misdemeanor

If the defendant does not qualify for partial confinement program(s), the recommendation will be for total confinement.

TERMS APPLICABLE TO ALL RECOMMENDATIONS

This offer includes credit for time served in custody solely on this case, up to the date of sentencing. It also includes standard conditions of supervision including reporting to DOC.

All recommendations include court costs of \$200.00; crime victim's compensations fee of \$500; fine of \$500; biological collection fee of \$100.00; appointed attorney's fees and related defense costs of _____ restitution of _____ or in an amount to be set by the court at a later date. The defendant agrees to pay restitution to victims of uncharged crimes contained in the discovery, and/or dismissed counts.

Other legal financial obligations include:

Drug Fund of _____
 Warrant Fees of _____
 Lab Fee of _____
 DV Penalty Assessment _____

Emergency Response Fee of _____
 Extradition Costs of _____
 Other of _____ for _____

SUPERVISION

- First Offender Option with up to two years of supervision
- Community Custody for _____ months or for a range of 24 to 48 months.
- _____ Years of probation/supervision on misdemeanor/gross misdemeanor.

SPECIAL SENTENCE OPTIONS

- If recommended by PSI, the state will recommend/consider DOSA.

MANDATORY SENTENCE REQUIREMENTS

- No possession/use/ownership of firearms/surrender concealed pistol license
- Provide biological sample for DNA identification
- HIV testing
- Revocation/suspension of driver's license per RCW 46.20.285, RCW 69.50.420
- Register as Sex/Kidnapping Offender per RCW 9A.44.130 and RCW 10.01.200
- Domestic Violence Perpetrator's Program

OTHER CONDITIONS OF SUPERVISION

(This list is non-exclusive – the State is free to recommend other usual conditions)

- The defendant shall perform affirmative acts necessary to monitor compliance with the orders of the court as required by the Department of Corrections (DOC) and shall comply with the instructions, rules and regulations of DOC for the conduct of the defendant during the period of community supervision/custody. The defendant shall receive permission from DOC prior to moving.
- Treatment for: substance abuse; mental health; anger control; other _____
- A chemical dependency screening report shall be ordered unless the defendant stipulates to having a chemical dependency that contributed to his/her offense.
- No contact with victim for 0 years.
- No violations of federal, state, or local criminal laws.
- Notify community corrections officer within 48 hours of any arrest or citation.
- No contact with other participants in the crime: _____
- Forfeiture of the following property: _____
- No use/ possession of alcohol and controlled substances. U/A and BA testing authorized.
- No possession of other people's identification.
- OTHER The defendant is free to argue for an exceptional sentence down below the the standard sentencing range. However, RCW 9.94A.540 requires a statutory mandatory minimum sentence of 60 months if the defendant used force or means likely to result in death or intended to kill the victim. Additionally the firearm enhancement runs consecutive to any underlying sentence and the State's position is that it is not subject to being reduced by the court as part of an exceptional sentence down.

If a defendant fails to appear for sentencing or commits any additional crimes before sentencing, but after a Statement of Defendant on Plea of Guilty is executed, it will be considered a breach of this agreement and the State will be free to make any recommendation(s) it deems appropriate.

John P. Fairgrieve
Deputy Prosecuting Attorney, WSBA #23107
Prosecutor's Offer of Settlement – 12/02 – Page 2
SHERYL JEAN MARTIN 07-1-01592-2

Date

1
2
3
4 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF CLARK

5 STATE OF WASHINGTON,
6 Plaintiff,
7 v.
8 SHERYL JEAN MARTIN,
Defendant

No. 07-1-01592-2

APPENDIX 2.2

DECLARATION OF CRIMINAL HISTORY

9 COME NOW the parties, and do hereby declare, pursuant to RCW 9.94A.100 that to the best of
10 the knowledge of the defendant and his/her attorney, and the Prosecuting Attorney's Office, the
defendant has the following undisputed prior criminal convictions:

11

CRIME	COUNTY/STATE CAUSE NO.	DATE OF CRIME	DATE OF SENTENCE	PTS.
NO KNOWN FELONIES				

12
13

14 The defendant committed a current offense while on community placement (adds one
15 point to score). RCW 9.94A.525.

16 DATED this _____ day of December, 2007.

17
18 _____
Defendant

19 _____
20 David T. McDonald, WSBA#18446
Attorney for Defendant

21 _____
22 John P. Fairgrieve, WSBA#23107
23 Deputy Prosecuting Attorney

24
25
26
27
28
29
DECLARATION OF CRIMINAL HISTORY
Revised 9/14/2000

CLARK COUNTY PROSECUTING ATTORNEY
1013 FRANKLIN STREET
PO BOX 5000
VANCOUVER WA 98666-5000
(360) 397-2261

MURDER, FIRST DEGREE

(RCW 9A.32.030)
 CLASS A FELONY
 SERIOUS VIOLENT

(If sexual motivation finding/verdict for conspiracy or solicitation, use form on page III-16)

I. OFFENDER SCORING (RCW 9.94A.525(9))

ADULT HISTORY:

Enter number of serious violent felony convictions x 3 =

Enter number of violent felony convictions x 2 =

Enter number of nonviolent felony convictions x 1 =

JUVENILE HISTORY:

Enter number of serious violent felony dispositions x 3 =

Enter number of violent felony dispositions x 2 =

Enter number of nonviolent felony dispositions x 1/2 =

OTHER CURRENT OFFENSES: (Other current offenses which do not encompass the same conduct count in offender score)

Enter number of violent felony convictions x 2 =

Enter number of nonviolent felony convictions x 1 =

STATUS:

Was the offender on community placement on the date the current offense committed? (if yes), + 1 =

Total the last column To get the **Offender Score** (Round down To the nearest whole number)

II. SENTENCING RANGE

A. OFFENDER SCORE:	0	1	2	3	4	5	6	7	8	9 or more
STANDARD RANGE (LEVEL XV)	240 - 320 months	250 - 333 months	261 - 347 months	271 - 361 months	281 - 374 months	291 - 388 months	312 - 416 months	338 - 450 months	370 - 493 months	411 - 548 months

- B. The range for attempt, solicitation, and conspiracy is 75% of the range for the completed crime (RCW 9.94A.595).
- C. When a court sentences an offender to the custody of the Dept. of Corrections, the court shall also sentence the offender to community custody for the range of 24 to 48 months, or to the period of earned release, whichever is longer (RCW 9.94A.715).
- D. If the court orders a deadly weapon enhancement, use the applicable enhancement sheets on pages III-6 or III-7 to calculate the enhanced sentence.

* The scoring sheets are intended to provide assistance in most cases but do not cover all permutations of the scoring rules

ASSAULT, FIRST DEGREE

(RCW 9A.36.011)
 CLASS A FELONY
 SERIOUS VIOLENT

(If sexual motivation finding/verdict for conspiracy or solicitation, use form on page III-16)

I. OFFENDER SCORING (RCW 9.94A.525(9))

ADULT HISTORY:

Enter number of serious violent felony convictions

x 3 =

Enter number of violent felony convictions

x 2 =

Enter number of nonviolent felony convictions

x 1 =

JUVENILE HISTORY:

Enter number of serious violent felony dispositions

x 3 =

Enter number of violent felony dispositions

x 2 =

Enter number of nonviolent felony dispositions

x 1/2 =

OTHER CURRENT OFFENSES: (Other current offenses which do not encompass the same conduct count in offender score)

Enter number of other violent felony convictions

x 2 =

Enter number of nonviolent felony convictions

x 1 =

STATUS:

Was the offender on community placement on the date the current offense committed? (if yes),

+ 1 =

Total the last column To get the **Offender Score** (Round down To the nearest whole number)

II. SENTENCING RANGE

A. OFFENDER SCORE:	0	1	2	3	4	5	6	7	8	9 or more
STANDARD RANGE (LEVEL XII)	93 - 123 months	102 - 136 months	111 - 147 months	120 - 160 months	129 - 171 months	138 - 184 months	162 - 216 months	178 - 236 months	209 - 277 months	240 - 318 months

- B. The range for attempt, solicitation, and conspiracy is 75% of the range for the completed crime (RCW 9.94A.595).
- C. When a court sentences an offender to the custody of the Dept. of Corrections, the court shall also sentence the offender to community custody for the range of 24 to 48 months, or to the period of earned release, whichever is longer (RCW 9.94A.715).
- D. Statutory minimum sentence is 60 months if the offender used force or means likely to result in death or intended to kill the victim (RCW 9.94A.540).
- E. If the court orders a deadly weapon enhancement, use the applicable enhancement sheets in pages III-6 or III-7 to calculate the enhanced sentence.

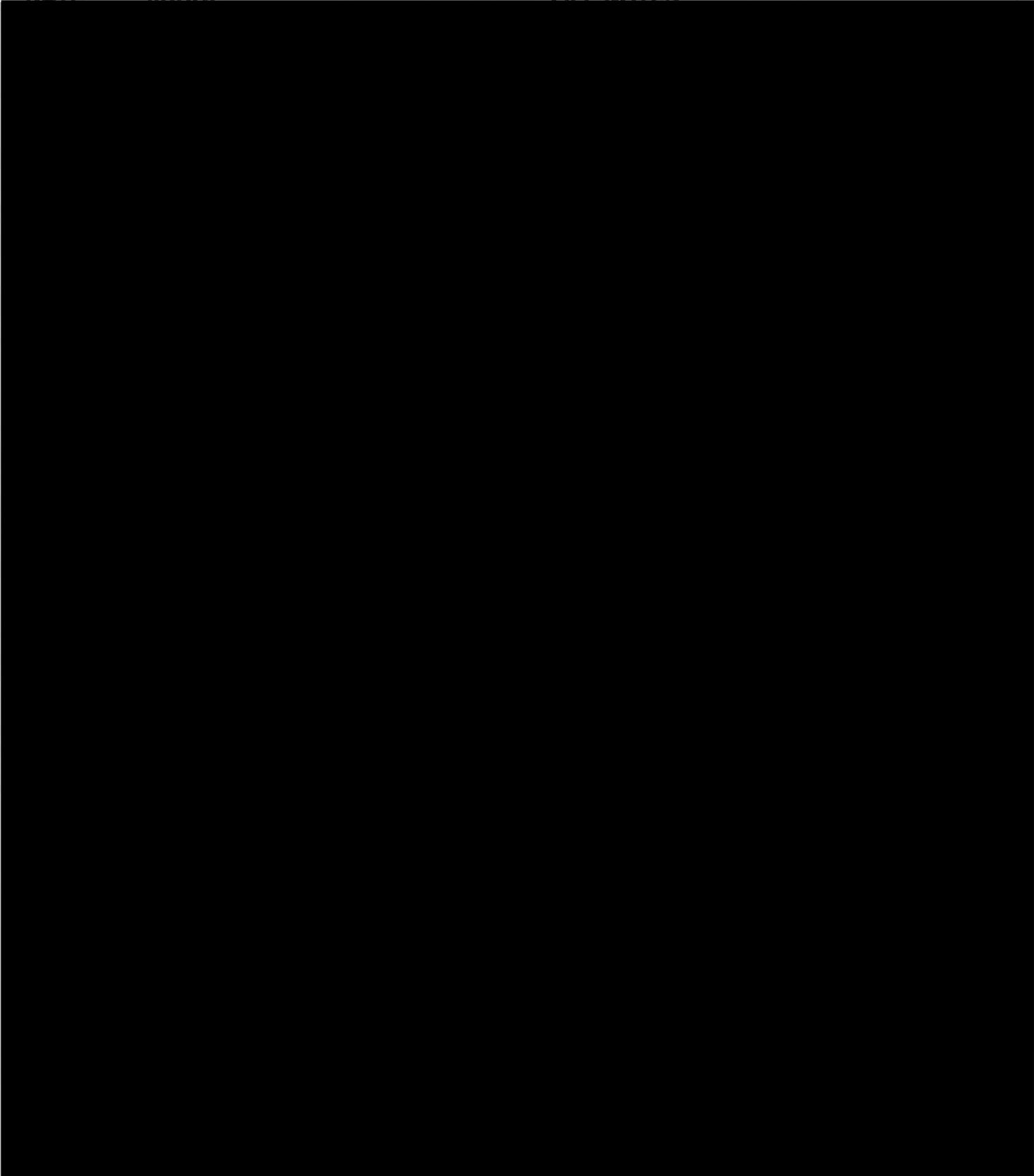
• The scoring sheets are intended to provide assistance in most cases but do not cover all permutations of the scoring rules

DEFENDANT: Martin, Sheryl DOB: / /

DATE

JUDGE

FILE NOTES



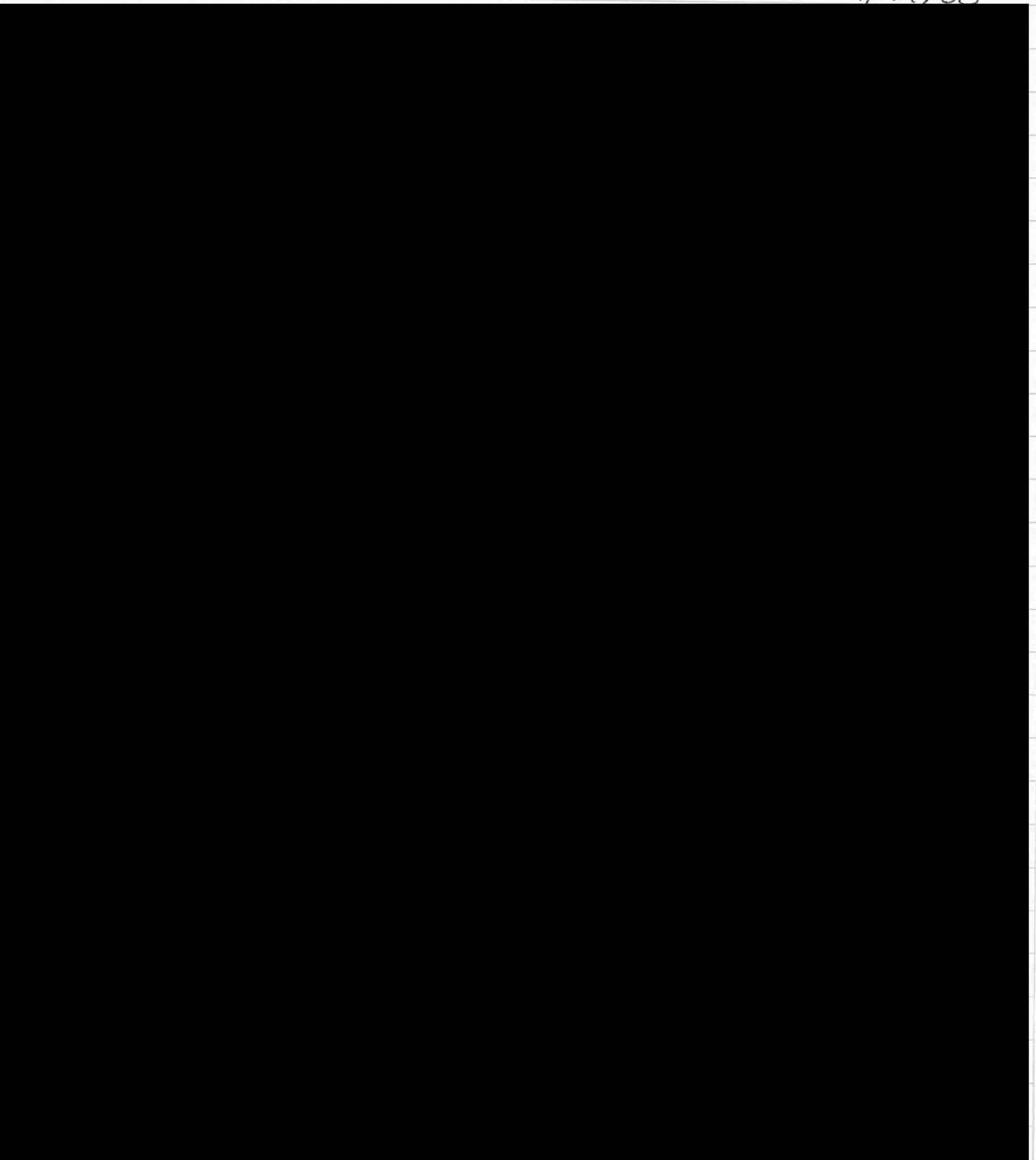
S+ v. Sheryl Martin

Martin



St v. Martin

9/29/08



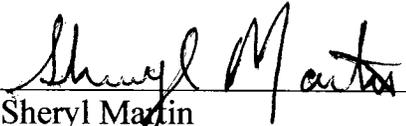
DECLARATION OF SHERYL MARTIN

I, Sheryl Martin, declare:

1. I am making this declaration based on information known to me and to the best of my memory.
2. I was the defendant in Clark County Superior Court Case No. 07-1-01592-2. I was convicted by a jury and am currently in prison serving the sentence that was imposed.
3. I recently directed my lawyer to make a public disclosure request for all plea offers that were made in my case.
4. My lawyer received the attached document ("Offer of Settlement" dated October 6, 2008) in response to his public disclosure request. He then mailed me a copy.
5. I have never before received or read that document. I was stunned.
6. I was also never told by my trial lawyer about the contents of that document.
7. In short, I only recently learned about that plea offer.
8. If I had been informed of the offer when it was made, I would have taken it.
9. I would have taken the offer at that time because although it took months after the incident for my emotional state to become stable, by the time the offer was made I did not want to put my family (or for that matter—myself) through the certain turmoil of a trial. It's called a "trial" for a reason and I did not want that for anyone.
10. Incidentally, as my case got closer to trial my lawyer kept assuring me that he would obtain a very favorable verdict for me. I believed him.
11. But, if I had been told of the offer when it was made I would have accepted.

1/3/18 WCCW
Date and Place

9601 Bayjacich Rd NW
Gig Harbor, WA
98332


Sheryl Martin

DECLARATION OF KRISTI M. MARTIN

I, Kristi M. Martin declare:

I am making this declaration based on information known to me and to the best of my memory.

I am a daughter-in-law of the defendant, Sheryl J. Martin, who is the defendant of Clark County Superior Court Case No. 07-1-01592-2. She was convicted by a jury and is currently in prison serving the sentence that was imposed.

I was recently informed that Sheryl made a request to her lawyer to make a public disclosure request for all plea offers that were made in her case.

Her lawyer received a document "Offer of Settlement" dated October 6, 2008, in response to his public disclosure request. A copy of that document was made available to me for review.

I have never seen or had knowledge of this document being presented to Sheryl or any family member. Sheryl and our family were never informed about this document by her trial lawyer.

If Sheryl was presented this document and aware of the option of a plea offer, we would have supported her with the decision of accepting the plea offer to avoid enduring a trial.

I'm disappointed that this document was not presented to my mother-in-law or any member of our family by her trial lawyer. If this document would have been presented to Sheryl and our family, we would have encouraged her to accept the plea offer.

4/24/18



Date

Signature

Kristi M. Martin

P.O. Box 233

29305 NW 51st Avenue

Ridgefield, WA 98642

Phone: (360) 609-1838

DECLARATION OF ERIC A. MARTIN

I, Eric A. Martin, declare:

I am making this declaration based on information known to me and to the best of my memory.

I am the eldest son of the defendant, Sheryl J. Martin. She is the defendant of Clark County Superior Court Case No. 07-1-01592-2. She was convicted by a jury and is currently in prison serving the sentence that was imposed.

I was recently informed that Sheryl made a request to her lawyer to make a public disclosure request for all plea offers that were made in her case.

Her lawyer received a document "Offer of Settlement" dated October 6, 2008, in response to his public disclosure request. A copy of that document was made available to me for review.

I have never seen or had knowledge of this document being presented to Sheryl or any member of our family. Neither Sheryl nor our family was ever informed about this document by her trial lawyer.

If my mother and any member of our family was presented this document and aware of the option of a plea offer, we would have strongly encouraged her to accept the plea offer and avoid the stress and emotional turmoil of a trial that has affected our family.

I do not understand why this document was not presented to mother or any member of our family by her trial lawyer. If this document would have been presented to my mother and our family, I know we would have highly encouraged her to accept the plea offer.

4-24-18

Date

Eric A. Martin

P.O. Box 233

29305 NW 51st Avenue

Ridgefield, WA 98642

Phone: (971) 235-3745



Signature

VERIFICATION OF PETITION

I, Sheryl Martin, verify that I have received a copy of the attached PRP and verify that it is true and correct and filed on my behalf.

4/11/18
Date and Place

Sheryl Martin
Sheryl Martin

WCCW
9601 Byjacich Road NW
Big Harbor, WA 98332-8300

ALSEPT & ELLIS

July 06, 2018 - 7:41 AM

Filing Personal Restraint Petition

Transmittal Information

Filed with Court: Court of Appeals Division II
Appellate Court Case Number: Case Initiation
Trial Court Case Title: Martin, Sheryl Jean
Trial Court Case Number: 07-1-01592-2
Trial Court County: Clark Superior Court
Signing Judge:
Judgment Date:

The following documents have been uploaded:

- PRP_Other_20180706073950D2526917_3172.pdf
This File Contains:
Other - IFP Motion
The Original File Name was MartinSMtnWaiveFees.pdf
- PRP_Personal_Restraint_Petition_20180706073950D2526917_4793.pdf
This File Contains:
Personal Restraint Petition
The Original File Name was MartinSPRPSuccessor.pdf

Comments:

Sender Name: jeffrey ellis - Email: jeffreyerwinellis@gmail.com
Address:
621 SW MORRISON ST STE 1025
PORTLAND, OR, 97205-3813
Phone: 503-222-9830

Note: The Filing Id is 20180706073950D2526917