

FILED
Court of Appeals
Division II
State of Washington
11/28/2018 4:01 PM
NO. 51948-8

COURT OF APPEALS, DIVISION II
STATE OF WASHINGTON

STATE OF WASHINGTON, RESPONDENT

v.

JEROME JOSEPH McFIELD, APPELLANT

Appeal from the Superior Court of Pierce County
The Honorable Grant Blinn, Judge

No. 16-1-02651-8

Brief of Respondent

MARK LINDQUIST
Prosecuting Attorney

By
ROBIN SAND
Deputy Prosecuting Attorney
WSB # 47838

930 Tacoma Avenue South
Room 946
Tacoma, WA 98402
PH: (253) 798-7400

Table of Authorities

State Cases

<i>In Re Pers. Restraint of Lui</i> , No. 92816-9 WL 2691802, at *3 (Wash. June 22, 2017)	7
<i>In re Peters</i> , 50 Wn. App. 702, 703, 750 P.2d 643 (1988).....	6, 7
<i>State v. Cameron</i> , 30 Wn. App. 229, 232, 633 P.2d 901 (1981).....	7
<i>State v. Coe</i> , 101 Wn.2d 772, 785, 684 P.2d 668 (1984)	7
<i>State v. Grier</i> , 171 Wn.2d 17, 34, 246 P.3d 1260 (2011).....	6
<i>State v. Hendrickson</i> , 129 Wn.2d 61, 78, 917 P.2d 563 (1996).....	6
<i>State v. Jones</i> , 183 Wn.2d 327, 338-39, 352 P.3d 776 (2015).....	6
<i>State v. Marshall</i> , 144 Wn.2d 266, 280, 27 P.3d 192 (2001).....	11
<i>State v. O’Neill</i> , 148 Wn.2d 564, 571, 62 P.3d 489 (2003).....	12
<i>State v. Osborne</i> , 102 Wn.2d 87, 99, 684 P.2d 683 (1984).....	7
<i>State v. Perez</i> , 33 Wn. App. 258, 261-62, 654 P.2d 708 (1982).....	13
<i>State v. Saunders</i> , 120 Wn. App. 800, 86 P.3d 232 (2004)	13
<i>State v. Taylor</i> , 83 Wn.2d 594, 596, 521 P.2d 699 (1974).....	12
<i>State v. Thomas</i> , 109 Wn.2d 222, 225–26, 743 P.2d 816 (1987)	6
<i>State v. Wakefield</i> , 130 Wn.2d 464, 472, 925 P.2d 183 (1996)	12

Federal and Other Jurisdictions

Hill v. Lockhart, 474 U.S. 52, 106 S. Ct. 366, 88 L.Ed.2d 203 (1985) 7

Strickland v. Washington, 466 U.S. 668, 687, 104 S. Ct. 2052, 2064,
80 L.Ed.2d 674 (1984)..... 6, 7, 10, 11

Statutes

RCW 9.41.040(1)(a) 1

RCW 9.94A.533..... 1

RCW 9A.36.011(1)(a) 1

RCW 9A.76.020(1)..... 1

Rules

CrR 4.2..... 12

CrR 4.2(f)..... 11

CrR 4.2(g) 13

CrR 4.7 7

CrR 4.7(h)(3)..... 8

Table of Contents

A.	ISSUES PERTAINING TO APPELLANT'S ASSIGNMENTS OF ERROR.	1
1.	Did trial counsel provide effective assistance of counsel when he represented defendant for more than a year, thoroughly investigated the case, brought on two additional attorneys to help him, and communicated all discovery to defendant?	1
2.	Did the trial court abuse its discretion when it denied the defendant's motion to withdraw his plea when the record plainly establishes that defendant knowingly and voluntarily entered into the plea when he knew all of the facts in discovery against him and received effective assistance in deciding whether to plead guilty?	1
B.	STATEMENT OF THE CASE.....	1
C.	ARGUMENT.....	6
1.	DEFENDANT'S TRIAL COUNSEL EFFECTIVELY ASSISTED DEFENDANT BY THOROUGHLY INVESTIGATING THE CASE AND COMMUNICATING THE FINDINGS WITH DEFENDANT AND HIS FAMILY, AND DEFENDANT WAS ONLY DISSATISFIED WITH COUNSEL'S REPRESENTATION ONCE COUNSEL CANDIDLY EXPRESSED AN OPINION THAT PREVAILING AT TRIAL WAS UNLIKELY.....	6
2.	THE TRIAL COURT DID NOT ABUSE ITS DISCRETION WHEN IT DENIED DEFENDANT'S MOTION TO WITHDRAW HIS GUILTY PLEA BASED ON CLAIMED INVOLUNTARINESS BECAUSE THE PLEA WAS A REFLECTION OF A RATIONAL CHOICE AMONG ALTERNATIVES AND RESULTED IN SUBSTANTIALLY LESS JAIL TIME THAN DEFENDANT WOULD HAVE RECEIVED IF FOUND GUILTY AT TRIAL.....	11

D.	CONCLUSION.....	15
----	-----------------	----

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

1. Did trial counsel provide effective assistance of counsel when he represented defendant for more than a year, thoroughly investigated the case, brought on two additional attorneys to help him, and communicated all discovery to defendant?
2. Did the trial court abuse its discretion when it denied the defendant's motion to withdraw his plea when the record plainly establishes that defendant knowingly and voluntarily entered into the plea when he knew all of the facts in discovery against him and received effective assistance in deciding whether to plead guilty?

B. STATEMENT OF THE CASE.

On June 28, 2016, Jerome McField, hereinafter “defendant,” was charged with one count of assault in the first degree in violation of RCW 9A.36.011(1)(a), with a firearm enhancement under RCW 9.94A.533, one count of unlawful possession of a firearm in the first degree in violation of RCW 9.41.040(1)(a), and one count of obstructing a law enforcement officer in violation of RCW 9A.76.020(1). CP 3-4.

On January 5, 2017, the State added two additional counts of assault in the first degree with firearm enhancements, one count of drive-by

shooting, and three counts of assault in the second degree with firearm enhancements. CP 68-72.¹ The obstruction charge was dropped. *Id.*

The State offered defendant an original plea deal. 04/17/18 RP 13²; CP 73-75. Defendant met with his attorney to discuss the deal. 04/17/18 RP 13. Defendant's attorney drafted a document listing each alleged incident and the corresponding charges. CP 79, Exh. 6; 04/17/18 RP 13. Each incident section contained the total time defendant could get if he was convicted of all the charges. Overall, defendant could have faced 57.75 years imprisonment based on defense counsel's calculation. CP 79, Exh. 6. The State's offer was for an agreed recommendation of 10.33 years. *Id.* Defendant rejected this offer and signed a liability waiver for his attorney. This waiver stated "against advice of counsel..." defendant was choosing to proceed to trial. *Id.*

After several continuances by both parties, trial was set for July 24, 2017. The State had difficulty getting witnesses to cooperate. 04/17/18 RP 31. Material witness bench warrants were issued. 04/17/18 RP 31; CP 76-78. Defendant claimed that the witnesses' uncooperative nature had nothing to do with his decision to proceed to trial, however, defendant pleaded guilty

¹ Clerks Papers numbered above No. 67 are a reflection of the State's estimate of how its supplemental designation will be numbered.

² The verbatim report of proceedings is contained in dated volumes and will be referred to by date.

to a second plea deal right after a critical witness, a shooting victim, had been held in the jail on his material witness warrant. 04/17/18 RP 30-32. Defense counsel interviewed this witness at the jail within a week or two of trial. 04/17/18 RP 53. The witness was willing to testify, and the testimony would have been unhelpful in defendant's case. *Id.*

Defense counsel came to a resolution with the State toward the end of the trial preparation period. 04/17/18 RP 47. The plea deal that defendant originally rejected was off the table. *Id.* Ultimately, the State offered a second amended Information that charged one count of assault in the first degree and one count of unlawful possession, with a recommended sentence of fifteen years. *Id.* Before defendant agreed to the plea deal, defense counsel discussed the potential outcome of the trial with defendant. 04/17/18 RP 49. Because charges arose out of three separate instances, there could have been separate trials and a variety of outcomes. *Id.* If defendant lost at trial, his sentence could have been anywhere between 35-60 years. *Id.* Defendant wanted to pursue self-defense against the first-degree assault charge. 04/17/18 RP 24. Defense counsel told defendant he did not think self-defense was a good strategy. *Id.* Ultimately, defendant notified defense counsel the day of trial that he “[didn’t] want to risk 60 years, and [he] would like to take the plea.” 04/17/18 RP 50. Counsel was otherwise prepared for trial. *Id.*

Defense counsel went over the entirety of the plea with defendant. 04/17/18 RP 47-49. Defendant engaged in a lengthy colloquy with the court. 07/24/17 RP 3-11. Based on the colloquy, the court found that defendant's plea was entered knowingly, voluntarily and intelligently. 07/24/17 RP 11. The day after the plea had been entered, defendant filed a motion to withdraw his plea and an evidentiary hearing was held. CP 21-23.

Similar to the issue raised in this brief, defendant's motion to withdraw was predicated on a claim that defense counsel's performance was deficient, and his plea was involuntary because of undue duress placed upon him by that lawyer. CP 21-23. The claimed duress was counsel expressing his opinion that self-defense was not an option, and that the trial outcome would not be favorable to defendant. 04/17/18 RP 28. Up to that point, defendant was admittedly satisfied with counsel's performance. 04/17/18 RP 28-29. Defendant never moved to remove counsel or hire a new attorney. 04/17/18 RP 29.

At the evidentiary hearing, defense counsel, defense assistant counsel Ms. Kavanaugh, defendant, and defendant's father testified. Defendant and defendant's father claimed that they never saw the police reports during meetings with their attorneys, however, the attorneys both recalled going over the content of the police reports with defendant. 04/17/18 RP 43-44, 57, 60. Defendant also admitted that he understood his

attorney was giving him a candid assessment of his chance at trial when counsel explained self-defense was not a viable defense, but he didn't like the attorney's assessment. 04/17/18 RP 33. Defendant also admitted that the decision to plead guilty was his, that he knew he didn't have to plead guilty, that he knew he could have gone to trial but chose not to, and that he felt like he was being forced to plead guilty because of the time he was facing at trial. 04/17/18 RP 35-36.

The trial court articulated the four indicia of a manifest injustice that withdrawal of a guilty plea requires. 04/17/18 RP 79-80. The trial court found that the State did not breach the plea agreement, that defendant ratified the agreement, that the plea was voluntary and defense counsel conveyed the contents of discovery to defendant prior to the plea. *Id.* Defendant was ultimately sentenced to 180 months on count I, and 41 months on count 4 to run concurrently. 04/27/18 RP 11-12; CP 31-44. A timely appeal was filed. CP 45-61.

C. ARGUMENT.

1. DEFENDANT’S TRIAL COUNSEL EFFECTIVELY ASSISTED DEFENDANT BY THOROUGHLY INVESTIGATING THE CASE AND COMMUNICATING THE FINDINGS WITH DEFENDANT AND HIS FAMILY, AND DEFENDANT WAS ONLY DISSATISFIED WITH COUNSEL’S REPRESENTATION ONCE COUNSEL CANDIDLY EXPRESSED AN OPINION THAT PREVAILING AT TRIAL WAS UNLIKELY.

Claims of ineffective assistance of counsel are reviewed de novo. *State v. Jones*, 183 Wn.2d 327, 338-39, 352 P.3d 776 (2015). The test for ineffective assistance of counsel in a direct appeal is (1) whether the defense counsel’s performance fell below an objective standard of reasonableness, and (2) whether this deficiency prejudiced the defendant. *State v. Thomas*, 109 Wn.2d 222, 225–26, 743 P.2d 816 (1987) citing *Strickland v. Washington*, 466 U.S. 668, 687, 104 S. Ct. 2052, 2064, 80 L.Ed.2d 674 (1984). The defendant must satisfy both deficient performance and prejudice. *State v. Hendrickson*, 129 Wn.2d 61, 78, 917 P.2d 563 (1996). Prejudice exists if there is a reasonable probability that except for counsel’s errors, the result of the proceeding would have differed. *State v. Grier*, 171 Wn.2d 17, 34, 246 P.3d 1260 (2011).

The *Strickland* test applies to claims of ineffective assistance of counsel in the plea process. *In re Peters*, 50 Wn. App. 702, 703, 750 P.2d 643 (1988), citing *Hill v. Lockhart*, 474 U.S. 52, 106 S. Ct. 366, 88 L.Ed.2d

203 (1985). Defendant confuses the standard of ineffective assistance of counsel claims by stating “ineffective assistance of counsel is an exception from the actual and substantial prejudice standard: we presume prejudice where a petitioner successfully establishes ineffective assistance of counsel. *In Re Pers. Restraint of Lui*, No. 92816-9 WL 2691802, at *3 (Wash. June 22, 2017).” Brief of Appellant, 8. This claim fails. His cited authority is not binding, and it is the standard for personal restraint petitions, not direct appeals. A defendant must show that his counsel failed to “actually and substantially [assist] his client in deciding whether to plead guilty,” *State v. Osborne*, 102 Wn.2d 87, 99. 684 P.2d 683 (1984) quoting *State v. Cameron*, 30 Wn. App. 229, 232, 633 P.2d 901 (1981), and that but for counsel’s failure to adequately advise him, he would not have pleaded guilty. *Hill v. Lockhart*, 474 U.S. at 57-59, *In re Peters*, 50 Wn. App. at 708. The reviewing court must indulge in a strong presumption that counsel’s performance is within the broad range of reasonable professional assistance. *Strickland v. Washington*, 466 U.S. at 689, *In re Peters*, 50 Wn. App. at 704, 750 P.2d 643.

Defendant claims his trial counsel was ineffective because he did not give defendant copies of the police reports. Brief of Appellant, 9. In discovery, a defendant has no per se right to obtain copies of police reports. *State v. Coe*, 101 Wn.2d 772, 785, 684 P.2d 668 (1984). CrR 4.7 governs

discovery. CrR 4.7(h)(3) states that “any materials furnished to an attorney pursuant to these rules shall remain in the exclusive custody of the attorney ...” CrR 4.7(h)(3) permits a defense attorney to provide a copy of materials to defendant “after making appropriate redactions which are approved by the prosecuting authority or order of the court.” Defense counsel followed the court rules and his obligations to defendant by communicating the substance of the police reports³ but not furnishing independent, unredacted copies. Neither trial counsel or Ms. Kavanaugh, another attorney assisting in the case, were explicitly asked during the evidentiary hearing if defendant or his family requested copies of the reports. Defendant and his father were the only parties to claim such a request. At the conclusion of the evidentiary hearing, the trial court stated,

I am equally convinced that had [defendant] or his father requested to see the actual reports, [defense counsel] would have shown them the police reports or, in the alternative, as an attorney, would have brought the issue before the Court for appropriate redactions.

04/17/18 RP 82. Defendant claims that defense counsel reviewed the charging documents and sentencing arrangements with him, but he was never shown the reports, photographs or scientific evidence. 04/17/18 RP 14. However, defense counsel recalled going through the police reports with

³ CP 65-67, FoF 7.

defendant and showing him all photographic evidence counsel had. 04/17/18 RP 44, 52. Ms. Kavanaugh independently recalled going over the information within the police reports and each version of events from witness interviews with defendant. 04/17/18 RP 57, 60. The trial court found each attorneys' testimony to be credible in total. CP 65-67, FoF 9, 10. Thus, the record supports that defendant did know and understand the contents of the police reports or discovery in the case against him contrary to his claims. Because defendant does not have a per se right to a copy of these reports and knew the content of them, deficient performance has not been established by defendant not receiving such copies.

Defendant's brief supports the assertion that the failure to furnish independent copies of police reports constitutes ineffective assistance with precedent that establishes ineffective assistance when counsel failed to investigate a case. Not providing defendant personal copies of police reports is not the same as not investigating the case. To the contrary, the record plainly establishes that counsel thoroughly investigated this case and communicated those findings to defendant.

Defense counsel estimated meeting with defendant at least a dozen times. 04/17/18 RR 41. He brought on two additional attorneys to help him. *Id.*, 42. Ms. Kavanaugh, an attorney, helped investigate and work the case, and a third attorney was brought on as a consultant. *Id.* During meetings

with defendant and defendant's father, the substance of the police reports and witness interviews were conveyed to defendant even though he did not receive personal copies. 04/17/18 RP 43-44; CP 65-67, FoF 7. Defense counsel provided defendant with print outs of the communications he had with the State. 04/17/18 RP 44. Counsel conducted witness interviews with "pretty much everyone who was on [defendant's] side of the case." 04/17/18 RP 53. There is absolutely nothing in the record to establish that defense counsel did not thoroughly investigate defendant's case. The failure to provide personal copies of police reports to defendant does not equate a failure to investigate, particularly when the trial court found that defendant had been made aware of the contents of the reports. CP 65-67, FoF 7. Defendant has not attempted to establish any other grounds that counsel failed to investigate this case or was otherwise deficient. Rather, defendant was pleased with counsel's year-long representation until counsel did not think defendant would succeed at trial. 04/17/18 RP 36. Prior to the evidentiary hearing, defendant never took an opportunity to address the court about any issues with counsel or attempt to replace counsel.

Defendant has not established that defense counsel's performance fell below an objective standard of performance in investigating this case or by not providing personal copies of police reports to defendant, thus failing to meet the first prong of the *Strickland* test. Because defendant has not

established ineffective assistance, he necessarily cannot establish the requisite prejudice.

Defense counsel was effective in investigating defendant's case. He rose to, if not above, an objective standard of performance in investigating and preparing for defendant's trial. He adequately communicated the facts in discovery to defendant and gave a candid assessment of defendant's likelihood of success at trial. He advised, given those chances, defendant consider taking the plea deal. Defendant ultimately decided to take the deal instead of facing up to 60 years imprisonment. Given all these facts and circumstances, defendant has fails to meet the stringent standard set forth by the *Strickland* test for ineffective assistance of counsel.

2. THE TRIAL COURT DID NOT ABUSE ITS DISCRETION WHEN IT DENIED DEFENDANT'S MOTION TO WITHDRAW HIS GUILTY PLEA BASED ON CLAIMED INVOLUNTARINESS BECAUSE THE PLEA WAS A REFLECTION OF A RATIONAL CHOICE AMONG ALTERNATIVES AND RESULTED IN SUBSTANTIALLY LESS JAIL TIME THAN DEFENDANT WOULD HAVE RECEIVED IF FOUND GUILTY AT TRIAL.

A trial court's denial of a motion to withdraw a guilty plea is reviewed for an abuse of discretion. *State v. Marshall*, 144 Wn.2d 266, 280, 27 P.3d 192 (2001). The trial court must permit a defendant to withdraw a guilty plea to correct a manifest injustice. CrR 4.2(f). A manifest injustice is one that is obvious, directly observable, overt and not obscure. *State v.*

Taylor, 83 Wn.2d 594, 596, 521 P.2d 699 (1974). “Without question, this imposes upon defendant a demanding standard.” *Id.*, at 596. This heavy burden is justified by the greater safeguards protecting a defendant at the time she enters her guilty plea. *Id.*, at 596. Accordingly, trial courts should exercise greater caution in setting aside a guilty plea once the required safeguards have been employed. *Id.*, at 597. For purposes of CrR 4.2, there are four *per se* nonexclusive instances where a manifest injustice exists: where (1) the defendant did not ratify the plea, (2) the plea was not voluntary, (3) the defendant received ineffective assistance of counsel, or (4) the plea agreement was not kept. *State v. Wakefield*, 130 Wn.2d 464, 472, 925 P.2d 183 (1996). Further, a trial court’s unchallenged Findings of Fact are treated as verities on appeal. *State v. O’Neill*, 148 Wn.2d 564, 571, 62 P.3d 489 (2003).

The trial court found defendant decided of his own accord to accept the State’s plea offer, defense counsel met his obligation to actually and substantially assist defendant in deciding whether to plead guilty, and defense counsel thoroughly and sufficiently reviewed with defendant the statement of defendant on plea of guilty that was accepted that day by the court. CP 65-67, FoF 5. The statement of defendant on plea of guilty reads:

In the City of Tacoma, State of Washington, on June 19, 2016, I knowingly possessed a firearm after having been adjudicated guilty as a juvenile of the serious offenses of residential burglary and attempted second degree assault. At the same time, I repeatedly fired that gun at Kwame Reyes and struck him multiple times. In doing so, I intended and did in fact inflict great bodily harm.

CP 8-20. The statement is initialed by defendant. *Id.* Defendant went on to engage in a lengthy colloquy with the court, where he acknowledged the truth of the above written statement. 07/24/17 RP 10. Defendant also stated that he understood the rights he was waiving and that no one had made any promises or threatened to get him to plead guilty. 07/24/17 RP 5-8. The trial court found that defendant's plea was entered knowingly, voluntarily and intelligently before accepting his plea and finding him guilty. 07/24/17 RP 11.

A defendant's plea is voluntary if he exercised free will. *State v. Saunders*, 120 Wn. App. 800, 86 P.3d 232 (2004). A written statement on a plea of guilty in compliance with CrR 4.2(g) provides prima facie verification of its constitutionality, and when the written plea is supported by a court's oral inquiry on the record, the presumption of voluntariness is well-nigh refutable. *State v. Perez*, 33 Wn. App. 258, 261-62, 654 P.2d 708 (1982). The prima facie showing of defendant's voluntariness has been established above by his ratified factual statement, as well as his colloquy

with the court asserting the truth of the statement and his understanding of the proceeding.

Defendant's argument that his guilty plea was not entered knowingly imputes his argument regarding ineffective assistance of counsel because both assertions are predicated on the above-dispelled claim of failure to furnish copies of police reports and information in discovery. Thus, as established above, defendant's claimed lack-of-knowledge is refuted by the record: defendant received effective assistance and made a knowing, intelligent and voluntary decision to enter a plea of guilty where he was made aware of all of the facts against him.

Defendant was set on going to trial until, coincidentally, the lead witness against him had been picked up on a material witness warrant and was willing to testify. Defendant denied the witness's cooperation had to do with his decision to plead guilty, however defense counsel interviewed this witness within "a week or two" of the plea and shortly thereafter, counsel began pursuing a plea deal with defendant's permission. 04/17/18 RP 42, 53. Once a plea agreement had been reached, defense counsel prepared the paperwork, went through its entirety with defendant, and he "talked about every aspect of potential resolution and what [the State] would agree to and how the outcome could be after a trial or, again, more than one trial." 04/17/18 RP 49. By accepting the State's plea, defendant avoided the

chance of facing up to 60 years in prison and guaranteed that he would get to experience life outside of prison. 04/17/18 RP 49.

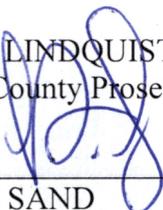
The record clearly supports that defendant made a plea that represents a voluntary and intelligent choice among the alternative courses of action open to him and is now regretting the decision he made. As such, defendant has failed to demonstrate a manifest injustice and the trial court did not abuse its discretion in denying defendant's motion to withdraw his guilty plea.

D. CONCLUSION.

For the above stated reasons, the State respectfully requests this Court affirm defendant's convictions.

DATED: November 27, 2018

MARK LINDQUIST
Pierce County Prosecuting Attorney



ROBIN SAND
Deputy Prosecuting Attorney
WSB # 47838

Angela Salyer
Appellate Intern

Certificate of Service:

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.

11/23/18 Therese Kar

Date

Signature

PIERCE COUNTY PROSECUTING ATTORNEY

November 28, 2018 - 4:01 PM

Transmittal Information

Filed with Court: Court of Appeals Division II
Appellate Court Case Number: 51948-8
Appellate Court Case Title: State of Washington, Respondent v. Jerome McField, Appellant
Superior Court Case Number: 16-1-02651-8

The following documents have been uploaded:

- 519488_Briefs_20181128160015D2535822_1487.pdf
This File Contains:
Briefs - Respondents
The Original File Name was McField Response Brief.pdf
- 519488_Designation_of_Clerks_Papers_20181128160015D2535822_0138.pdf
This File Contains:
Designation of Clerks Papers - Modifier: Supplemental
The Original File Name was mcfield supp designation.pdf

A copy of the uploaded files will be sent to:

- brett@hesterlawgroup.com

Comments:

Sender Name: Therese Kahn - Email: tnichol@co.pierce.wa.us

Filing on Behalf of: Robin Khou Sand - Email: rsand@co.pierce.wa.us (Alternate Email: PCpatcecf@co.pierce.wa.us)

Address:
930 Tacoma Ave S, Rm 946
Tacoma, WA, 98402
Phone: (253) 798-7400

Note: The Filing Id is 20181128160015D2535822