

FILED
Court of Appeals
Division II
State of Washington
8/16/2019 1:07 PM

NO. 52133-4

COURT OF APPEALS, DIVISION II
STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

v.

ATALANI TILI,

Appellant.

Appeal from the Superior Court of Pierce County
The Honorable K.A. van Doorninck

No. 17-1-00748-1

BRIEF OF RESPONDENT

MARY E. ROBNETT
Prosecuting Attorney

BRITTA ANN HALVERSON
Deputy Prosecuting Attorney
WSB # 44108
930 Tacoma Ave., Rm 946
Tacoma, WA 98402
(253) 798-7400

TABLE OF CONTENTS

I. INTRODUCTION 1

II. RESTATEMENT OF THE ISSUES 1

A. Whether the trial court properly imposed crime-related sentencing and community custody conditions restricting defendant's contact with minors, which were reasonably necessary to protect the public from defendant injuring or causing the death of another child?..... 1

III. STATEMENT OF THE CASE..... 1

IV. ARGUMENT..... 6

A. THE TRIAL COURT PROPERLY IMPOSED CRIME-RELATED SENTENCING AND COMMUNITY CUSTODY CONDITIONS WHICH WERE REASONABLY NECESSARY TO FURTHER THE STATE'S COMPELLING INTEREST IN PREVENTING HARM AND PROTECTING CHILDREN. 6

V. CONCLUSION..... 15

TABLE OF AUTHORITIES

State Cases

| | |
|---|----------------|
| <i>In re Pers. Restraint of Rainey</i> , 168 Wn.2d 367, 375, 229 P.3d 686 (2010)..... | 10 |
| <i>State v. Ancira</i> , 107 Wn. App. 650, 653-54, 27 P.3d 1246 (2001)..... | 10, 14 |
| <i>State v. Armendariz</i> , 160 Wn.2d 106, 110, 156 P.3d 201 (2007) | 6 |
| <i>State v. Bahl</i> , 164 Wn.2d, 739, 753, 193 P.3d 678 (2008) | 7, 10 |
| <i>State v. Casimiro</i> , 8 Wn. App.2d 245, 249, 438 P.3d 137 (2019) | 8 |
| <i>State v. Corbett</i> , 158 Wn. App. 576, 597-601, 242 P.3d 52 (2010)..... | 8 |
| <i>State v. Johnson</i> , 180 Wn. App. 318, 325, 327 P.3d 704 (2014)..... | 6, 7 |
| <i>State v. Llamas-Villa</i> , 67 Wn. App. 448, 456, 836 P.2d 239 (1992) | 7 |
| <i>State v. McKee</i> , 141 Wn. App. 22, 37, 167 P.3d 575 (2007)..... | 9 |
| <i>State v. Riles</i> , 135 Wn.2d 326, 347, 957 P.2d 655 (1998), <i>abrogated on other grounds by Valencia</i> , 169 Wn.2d 782..... | 10, 11, 12, 13 |
| <i>State v. Riley</i> , 121 Wn.2d 22, 37, 846 P.2d 1365 (1993)..... | 8, 10, 12 |
| <i>State v. Sanford</i> , 128 Wn. App. 280, 288, 115 P.3d 368 (2005)..... | 10 |
| <i>State v. Sansone</i> , 127 Wn. App. 630, 643, 111 P.3d 1251 (2005)..... | 7 |
| <i>State v. Valencia</i> , 169 Wn.2d 782, 791-92, 239 P.3d 1059 (2010)..... | 7 |
| <i>State v. Warren</i> , 165 Wn.2d 17, 32, 195 P.3d 940 (2008)..... | 8 |

Statutes

Former RCW 9.94A.030(46) (2017) 6

Former RCW 9.94A.120(9)(c)(ii)..... 11

Laws of 2018, ch. 201, § 9004..... 7

RCW 9.94A.030(10)..... 7

RCW 9.94A.505(9)..... 1, 6, 7, 8, 12, 13

RCW 9.94A.535(3)(b) 2

RCW 9.94A.535(3)(n) 2

RCW 9.94A.701(1)(b) 6

RCW 9.94A.703..... 7

RCW 9.94A.703(1)..... 6

RCW 9.94A.703(1)(b) 6

RCW 9.94A.703(2)..... 6

RCW 9.94A.703(3)..... 1, 6

RCW 9.94A.703(3)(b) 7, 8, 12, 13

RCW 9.94A.703(3)(f)..... 7, 8, 12, 13

RCW 9.94A.703(4)..... 7

RCW 9.94A.704..... 6

RCW 9.94A.729(3)(c) 12

I. INTRODUCTION

Defendant Atalani Tili caused the death of a two-year-old boy who was entrusted to her care. She pleaded guilty to a reduced charge of manslaughter in the first degree and agreed to restrict her contact with minor children. Defendant now complains the conditions prohibiting contact with unrelated minors under the age of 13 and prohibiting contact with all minors under the age of five after her release from custody are unconstitutionally overbroad and violate her rights of association and assembly. Defendant's arguments are without merit. The trial court properly imposed the conditions, because they are statutorily authorized by RCW 9.94A.505(9) and RCW 9.94A.703(3), and they are reasonably necessary to protect children from similar homicidal violence.

II. RESTATEMENT OF THE ISSUES

- A. Whether the trial court properly imposed crime-related sentencing and community custody conditions restricting defendant's contact with minors, which were reasonably necessary to protect the public from defendant injuring or causing the death of another child?

III. STATEMENT OF THE CASE

On February 21, 2017, the Pierce County Prosecutor's Office charged Atalani Tili, hereinafter "defendant," with one count of Assault of

a Child in the First Degree.¹ CP 3. According to the Declaration for Determination of Probable Cause,

On Tuesday, February 14, 2017, around 9am, 2 year-old K.P. was brought into the emergency room by ambulance. When he arrived, K.P. was unconscious. He was immediately transferred to surgery to relieve the pressure in his head due to brain swelling.

Lakewood police responded to the hospital and learned that for the last three weeks, K.P. had been staying with a family friend, the defendant Atalani (Jeanette) Tili, while his mother settled into a new job. Police learned that this morning, the defendant woke up K.P. and he subsequently collapsed back onto the bed when she tried to dress him. The defendant saw that K.P.'s eyes were rolled back in his head. She called K.P.'s mother, and after his mother arrived, the defendant called 911.

Upon initial examination, medical personnel were unsure whether K.P.'s injury was due to trauma or a medical condition. K.P. had suffered a stroke, had significant swelling in his brain, and there was a subdural hematoma present in his brain.

After K.P. was released from surgery, law enforcement took photos of his injuries. Detective Bowl noted multiple scratches and bruises on his body, including a 1 inch laceration on the back of K.P.'s head that appeared to be recent.

Detective Bowl spoke with Dr. Duralde, who believed K.P.'s injury was due to multiple shaking events. Detective Bowl also learned that K.P.'s injury had worsened throughout the night and a second surgery was required to relieve the pressure in his skull.

The children in the defendant's household were interviewed. The children told law enforcement that K.P. was sick on Monday night, couldn't eat, and couldn't sit up on his own.

The defendant was interviewed. She described K.P. as an aggressive boy and difficult when his mother leaves him. When told by law

¹ The State also charged aggravating circumstances pursuant to RCW 9.94A.535(3)(n) and .535(3)(b). CP 3.

enforcement that something had happened to K.P. to cause his injury, she told them the following:

On Monday, 2/13/17, she was tending to a scratch on K.P.'s eye when he bit her hand and wouldn't let go. She shook K.P. and threw him against a dresser in the room. She said K.P. lay back against the dresser whimpering. She left the room to run cold water on her hand. When she returned to the room three minutes later, K.P. was on all fours on the bed and attempting to get up. She described that he was having trouble doing so. She explained that when she threw him against the dresser he struck the back of his head on an exposed hinge. She said K.P. was not acting normally that night and he went to bed early. She felt that something was wrong, but she hoped he would get better with sleep.

The defendant explained that another event happened approximately a week ago. K.P. was angry that his mother left and threw a tantrum. She tried to calm him down but he just screamed louder. She grabbed him by his arm and demonstrated shaking him. She said she threw him to the floor and he stopped crying. She is not sure if he hit his head on the nearby dishwasher or on the floor. She told him to get up and he did. He then went to bed.

On February 21, 2017, Dr. Duralde completed a progress note summarizing K.P.'s injuries: that a head CT showed decreased attenuation throughout the right cerebral hemisphere with superimposed severe cerebral edema; there was a holohemispheric right subdural hematoma as well as a trace apical left subdural hematoma; there was uncal herniation and brainstem ischemia and a right sided stroke. Dr. Duralde noted that the two episodes of shaking with impact as described by the defendant correspond to K.P.'s symptoms and findings. Further, that the shaking would have caused shearing injury to the brain with more severe consequences on the second event resulting in brain injury, subdural bleeding, and retinal hemorrhages leading to brain swelling and hypoxia.

As of February 21, 2017, K.P. continues to be unresponsive and is maintained on life support. K.P.'s family has decided to remove life support at this time.

CP 1-2, 4-5. K.P. subsequently passed away on February 24, 2017. CP 9. The State filed an amended information charging defendant with one count of Murder in the Second Degree and one count of Assault of a Child in the First Degree, both with aggravators. CP 6-7.

On April 17, 2018, defendant pleaded guilty to a second amended information charging her with one count of manslaughter in the first degree. CP 36, 39-48. Defendant provided the following factual statement in her statement on plea of guilty:

Between 2/1/2017 and 2/13/2017, in Pierce County WA, I was babysitting KP when he bit my hand hard and would not let go. I jerked my hand back and when I did so, I recklessly pushed him back and he fell back and hit his head on the dresser by the bed. I left the room to run some water on my hand when I came back he was on the bed attempting to get up, but was having trouble doing so. I knew he had hit his head but assumed he would get better after sleeping, but he did not. I did not take him to the hospital like I should have. He died on February 24, 2017...In reacting as I did in pushing KP as I did in response to him biting me, I knew of and disregarded a substantial risk that his death might occur. My disregard of this risk was a gross deviation from conduct that a reasonable person would exercise in the same situation. A.T.

CP 47. Defendant also agreed the court could review the statement of probable cause to find a factual basis for her plea. CP 47. *See* CP 1-2, 4-5, 8-9. Defendant agreed to the following recommended conditions as part of her guilty plea: “no unsupervised contact with related minors (contact permissible as long as another adult is present) no contact with unrelated

minors under the age of 13, no babysitting[.]” CP 42. *See also*, 4/17/18 RP 14-15.

During sentencing, the court noted,

This is obviously a really sad case. There’s nothing more precious or fragile than a young child and it’s sort of unthinkable what happened.

I appreciate that you’re taking responsibility and I appreciate that the attorneys worked hard to reach a negotiation that all parties think is fair and just. It seems to me, in terms of the high end of the range is totally appropriate.

There’s nothing you can do or say to make this up to the family. There’s just nothing that can be done, and it’s really tragic.

I think that the conditions for community supervision are very well thought out, and I’m very concerned about contact with children when she does get out. That’s the agreement of the State that it be supervised, essentially. That’s going to be enforced. She shouldn’t be with a child that’s under the age of five, I think.

4/17/18 RP 16-17.

The court imposed a standard range sentence of 102 months in the Department of Corrections followed by 36 months of community custody. CP 55, 58-59. The court also imposed the following sentencing and community custody conditions:

- No contact [with] unrelated minors under age 13
- No unsupervised contact [with] related children (by adult)
- No contact with any child under 5 after release from custody, whether related or unrelated

CP 57, 59, 64. *See also*, 4/17/18 RP 17-18. The court authorized contact with defendant's own children while incarcerated. *Id.* Defendant appeals.

IV. ARGUMENT

A. THE TRIAL COURT PROPERLY IMPOSED CRIME-RELATED SENTENCING AND COMMUNITY CUSTODY CONDITIONS WHICH WERE REASONABLY NECESSARY TO FURTHER THE STATE'S COMPELLING INTEREST IN PREVENTING HARM AND PROTECTING CHILDREN.

The Sentencing Reform Act of 1981 (SRA) authorizes the trial court to impose "crime-related prohibitions and affirmative conditions" as part of any sentence. RCW 9.94A.505(9); *State v. Johnson*, 180 Wn. App. 318, 325, 327 P.3d 704 (2014). When a court sentences an offender to a term of community custody, the court must sentence that offender to conditions of community custody listed in RCW 9.94A.703(1) and (2).² The court must order the offender to comply with conditions imposed by the Department of Corrections (DOC). RCW 9.94A.703(1)(b) (citing RCW 9.94A.704). The court may also order those conditions provided in RCW 9.94A.703(3).

Whether a trial court has statutory authority to impose a community custody condition is reviewed *de novo*. *State v. Armendariz*, 160 Wn.2d 106, 110, 156 P.3d 201 (2007); *Johnson*, 180 Wn. App. at 325. Imposing statutorily authorized conditions of community custody is within the

² Community custody is generally required for those convicted of manslaughter in the first degree and sentenced to the custody of the department of corrections. *See* RCW 9.94A.701(1)(b); former RCW 9.94A.030(46) (2017).

discretion of the sentencing court and is reviewed for abuse of discretion. *State v. Bahl*, 164 Wn.2d, 739, 753, 193 P.3d 678 (2008); *Johnson*, 180 Wn. App. at 326. The proper remedy for a condition not authorized by statute is to reverse that portion of the sentence and remand for resentencing of the improper condition. *State v. Sansone*, 127 Wn. App. 630, 643, 111 P.3d 1251 (2005). Community custody conditions generally will be reversed only if their imposition is manifestly unreasonable. *State v. Valencia*, 169 Wn.2d 782, 791-92, 239 P.3d 1059 (2010).

The sentencing court may impose as part of any term of community custody conditions that the defendant “[r]efrain from direct or indirect contact with...a specified class of individuals” and “[c]omply with any crime-related prohibitions.” RCW 9.94A.703(3)(b), (f).³ *See also*, RCW 9.94A.505(9) (court may impose crime-related prohibitions as part of any sentence). A crime-related prohibition “means an order of a court prohibiting conduct that directly relates to the circumstances of the crime for which the offender has been convicted.” RCW 9.94A.030(10). Although the conduct prohibited must be directly related to the crime, it need not be casually related. *State v. Llamas-Villa*, 67 Wn. App. 448, 456, 836 P.2d 239 (1992). A community custody prohibition designed to prevent the offender

³ RCW 9.94A.703(4) was amended in 2018. *See* Laws of 2018, ch. 201, § 9004. The amendments do not affect the applicable subsections of RCW 9.94A.703 or analysis in this case.

from further criminal conduct of the type for which the offender was convicted can be crime-related. *See State v. Riley*, 121 Wn.2d 22, 37, 846 P.2d 1365 (1993). Generally, the reviewing court will uphold crime-related prohibitions if they are reasonably related to the crime. *State v. Warren*, 165 Wn.2d 17, 32, 195 P.3d 940 (2008).

Here, the sentencing court had the statutory authority to impose the sentencing and community custody conditions prohibiting defendant's contact with unrelated minors under the age of 13 and all minors under the age of five (after release from custody) pursuant to RCW 9.94A.505(9) and RCW 9.94A.703(3)(b) and (f). Defendant's victim was a two-year-old boy who was left in her care. CP 1-2, 4-5, 47. Defendant does not appear to argue that the challenged conditions are not crime-related or otherwise unauthorized by statute. Nor could she. Defendant's actions caused the death of a minor child. Moreover, defendant affirmatively agreed to the conditions and so cannot claim the conditions are not crime-related on appeal. *See State v. Casimiro*, 8 Wn. App.2d 245, 249, 438 P.3d 137 (2019).

In *State v. Corbett*, 158 Wn. App. 576, 597-601, 242 P.3d 52 (2010), the court held a sentencing condition prohibiting the defendant from contact with *all* minor children, including his non-victim biological children, was a valid crime-related prohibition. There, the defendant served as primary caregiver for his stepchildren while their mother worked. *Id.* at 582. During

this time the defendant raped his young stepdaughter and thus “abused his parenting role by sexually abusing a minor in his care.” *Id.* at 582-86, 599. The court thus found “[t]he no-contact order is reasonably necessary to protect Corbett’s children because of his history of using the trust established in a parental role to satisfy his own prurient desire to sexually abuse minor children.” *Id.* at 599. Similarly, the no contact provisions here are reasonably necessary to protect minor children from defendant’s reckless behavior which has already led to the death of a young child. The conditions are statutorily authorized and should be upheld.

Defendant, however, argues the conditions prohibiting contact with unrelated minors under the age of 13 and prohibiting contact with any minor under the age of five after release from custody are unconstitutionally overbroad and violate her fundamental rights to free association and assembly. *See* Brief of Appellant at 1, 3, 7. Defendant’s arguments are without merit.

“[A]n offender’s constitutional rights during community placement are subject to SRA-authorized infringements, including crime-related prohibitions.” *State v. McKee*, 141 Wn. App. 22, 37, 167 P.3d 575 (2007) (provision barring pornographic materials was crime-related condition of community custody and therefore not overbroad in violation of defendant’s free speech rights). Imposing statutorily authorized conditions of

community custody is within the discretion of the sentencing court, even when the condition interferes with a fundamental right. *State v. Bahl*, 164 Wn.2d 739, 753, 193 P.3d 678 (2008); *In re Pers. Restraint of Rainey*, 168 Wn.2d 367, 375, 229 P.3d 686 (2010). Limitations on fundamental rights are permissible, provided they are imposed sensitively. *State v. Riley*, 121 Wn.2d 22, 37, 846 P.2d 1365 (1993). An offender's freedom of association may be restricted if reasonably necessary to accomplish the essential needs of the state and public order. *Riley*, 121 Wn.2d at 37-38; *Bahl*, 164 Wn.2d at 757. Preventing harm to children is a compelling State interest. *State v. Ancira*, 107 Wn. App. 650, 653-54, 27 P.3d 1246 (2001). Thus, if the record shows that it is reasonably necessary to further the government's compelling interest in preventing harm and protecting children, then a court can impose a community custody condition that restricts a defendant's fundamental rights. *See State v. Riles*, 135 Wn.2d 326, 347, 957 P.2d 655 (1998), *abrogated on other grounds by Valencia*, 169 Wn.2d 782; *State v. Sanford*, 128 Wn. App. 280, 288, 115 P.3d 368 (2005); *Ancira*, 107 Wn. App. at 654.

In *Riley*, the defendant was convicted of multiple counts of computer trespass and possession of a stolen access device after he used his home computer to obtain long distance telephone access codes from telephone company computers. 121 Wn.2d at 25. As part of his sentence,

the court prohibited the defendant from associating with other computer hackers. *Id.* at 27, 36. The Washington Supreme Court upheld the condition, finding,

Prohibiting Riley from associating with other computer hackers is...reasonable. Limitations upon fundamental rights are permissible, provided they are imposed sensitively...The prohibition against Riley associating with other computer hackers is punitive and helps prevent Riley from further criminal conduct for the duration of his sentence. *It is therefore not an unconstitutional restriction of Riley's freedom of association.*

Id. at 37-38 (emphasis added).

In *Riles*, defendant Riles was convicted of first degree rape of a child for anally raping a six-year-old boy. 135 Wn.2d at 332. On appeal he challenged a community placement condition which prohibited him from contacting "any minor-age children," arguing the condition was unconstitutionally overbroad because it infringed upon his right to free association. *Id.* at 333-34, 336, 346. The court rejected his argument, finding:

[A]lthough Petitioner Riles' constitutionally protected freedom of movement may be limited, it is a valid restriction because the prohibition is not real or substantial in relation to the conduct legitimately regulated by the statute. That is, RCW 9.94A.120(9)(c)(ii)⁴ plainly authorizes this type of prohibition and it does not affect Petitioner's freedom of association apart from the court's order.

⁴⁴ Former RCW 9.94A.120(9)(c)(ii) provided, "As a part of any sentence imposed under (a) or (b) of this subsection, the court may also order... The offender shall not have direct or indirect contact with the victim of the crime or a specified class of individuals." *See Riles*, 135 Wn.2d at 346.

Petitioner Riles' argument on overbreadth is without merit. He was convicted of anally raping a six-year-old boy. Prohibiting [Riles] from having contact with minor-age children for the period of his community placement upon his release from prison is a reasonable restriction imposed upon him for protection of the public—especially children...The sentencing court reasonably could prohibit him from having contact with children.

Id. at 347, 349.

Here, as in *Riley* and *Riles*, the challenged conditions are not an unconstitutional restriction of defendant's freedom of association and assembly. Not only are the challenged conditions crime-related and statutorily authorized by RCW 9.94A.505(9) and RCW 9.94A.703(3)(b) and (f), but they are also reasonably necessary to protect the public (i.e., children) from similar homicidal violence. Moreover, the conditions are sensitively imposed, as they permit defendant to contact her children while incarcerated, permit supervised contact with related minors over the age of five, and permit contact with all minors over the age of 13.⁵ CP 57, 59, 64. Although defendant's "constitutionally protected freedom of movement may be limited," the conditions are "valid restriction[s] because the prohibition[s] [are] not real or substantial in relation to the conduct

⁵ Defendant's current minor children will be over five years old once defendant is released from prison, and she will therefore be able to have contact with them at that time. See CP 58 (102 months confinement imposed); CP 100 (listing defendant's children); RCW 9.94A.729(3)(c) (earned release time for offenders convicted of serious violent offense).

legitimately regulated by the statute[s].” *Riles*, 135 Wn.2d at 347. RCW 9.94A.505(9) and RCW 9.94A.703(3)(b) and (f) plainly authorize this type of prohibition, and the restrictions do not affect defendant’s freedom of association apart from the court’s order. *See Riles*, 135 Wn.2d at 347.

Defendant also cites *Riles* in her opening brief. *See* Brf. App. at 6. *Riles* was a consolidated case that also involved a defendant by the name of Gholston. Gholston was convicted of raping a 19-year-old woman. 135 Wn.2d at 336. At sentencing the court ordered “no contact with...any minor-age children without approval of your Community Corrections Officer and mental health treatment counselor.” *Id.* at 336. On appeal, the court struck the condition prohibiting contact with minors, because Gholston’s victim was not a minor and there was “no reasonable relationship between his crime” and the no contact order. *Id.* at 349-50. Defendant’s reliance on *Riles* regarding defendant Gholston is therefore misplaced, because here defendant’s victim was a minor. The *Riles* court noted that if Gholston had victimized a child, then “[i]t would be logical...to be prohibited from contact with that child, as well as from contact with other children.” *Riles*, 135 Wn.2d at 350. The court also noted that although the no contact with minors provision was not justified under the facts of Gholston’s case, the court did “not see it as an unconstitutional infringement.” *Id.*

Defendant also cites *Ancira*, but in that case the defendant was convicted of violating a no-contact order involving his wife. 107 Wn. App. at 652. The trial court entered a new no-contact order at sentencing which prohibited all contact with the defendant's wife and two minor children. *Id.* at 652, 654-55. On appeal, the court found the order's inclusion of Ancira's minor children violated his fundamental right to parent, because "it was not reasonably necessary to meet the State's legitimate objectives." *Id.* at 652. *See also, Ancira* at 654-55 (no evidence that prohibiting the defendant from all contact with his children was reasonably necessary to prevent them from harm of witnessing domestic violence). *Ancira* is distinguishable from the present matter. First, *Ancira* involved a different fundamental right (the right to parent). Second, the defendant's victim was an adult, not a minor child. Third, the court still noted that based on the record "some limitations on Ancira's contact with his children, such as supervised visitation, might be appropriate." *Ancira*, 107 Wn. App. at 655. Here, again, defendant directly harmed a minor child, and the challenged conditions are limited by age and relation.

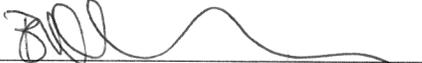
While defendant may feel that restricting contact with unrelated minors under 13 and all minors under five is unfair, the restrictions are reasonable, appropriate, and statutorily authorized given the severity of defendant's criminal conduct. The record shows that defendant may be a

danger to children now and upon her release. The challenged restrictions in this case are valid crime-related sentencing and community custody conditions. They are not overbroad, and the sentencing court had the statutory authority to impose the conditions. Moreover, the conditions are reasonably necessary to further the State's compelling interest in preventing harm and protecting children. This Court should affirm the sentencing and community custody conditions imposed by the trial court.

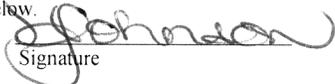
V. CONCLUSION

For the foregoing reasons, the State respectfully requests this Court affirm defendant's sentence.

RESPECTFULLY SUBMITTED this 16th day of August, 2019.

MARY E. ROBNETT
Pierce County Prosecuting Attorney

BRITTA ANN HALVERSON
WSB# 44108
Deputy Prosecuting Attorney

Certificate of Service:
The undersigned certifies that on this day she delivered by E-file or U.S. mail to the attorney of record for the appellant / petitioner and appellant / petitioner c/o his/her 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.

8/16/19 
Date Signature

PIERCE COUNTY PROSECUTING ATTORNEY

August 16, 2019 - 1:07 PM

Transmittal Information

Filed with Court: Court of Appeals Division II
Appellate Court Case Number: 52133-4
Appellate Court Case Title: State of Washington, Respondent v. Atalani Tili, Appellant
Superior Court Case Number: 17-1-00748-1

The following documents have been uploaded:

- 521334_Briefs_20190816130713D2704640_9246.pdf
This File Contains:
Briefs - Respondents
The Original File Name was Tili Response Brief.pdf

A copy of the uploaded files will be sent to:

- SCCAttorney@yahoo.com

Comments:

Sender Name: Heather Johnson - Email: hjohns2@co.pierce.wa.us

Filing on Behalf of: Britta Ann Halverson - Email: britta.halverson@piercecountywa.gov (Alternate Email: PCpatcecf@piercecountywa.gov)

Address:
930 Tacoma Ave S, Rm 946
Tacoma, WA, 98402
Phone: (253) 798-7875

Note: The Filing Id is 20190816130713D2704640