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No. 52409-1-II
Cowlitz County Superior Court Cause No. 17-1-00938-08

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

STATE OF WASHINGTON,

Respondent,

v.

SETH JOHN WILCOX,

Petitioner.

BRIEF OF RESPONDENT

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TABLE OF CONTENTS

	PAGE
A. ISSUES ON APPEAL.....	1
B. BRIEF ANSWER.....	1
C. STATEMENT OF THE CASE.....	2
D. ARGUMENT.....	8
I. THE DEFENDANT SHOULD BE RESENTENCED BECAUSE THE PATTERN JURY INSTRUCTION DEFINING PROLONGED PERIOD, AN ELEMENT OF THE TWO AGGRAVATING FACTOR, COMMENTED ON THE EVIDENCE.....	8
II. THE TRIAL COURT DID NOT ABUSE ITS DISCRETION WHEN ADMITTING EXPERT TESTIMONY ON THE GENERAL BEHAVIORAL EFFECTS ON VICTIMS OF CHILD SEXUAL ABUSE.....	8
III. THE TRIAL COURT DID NOT ABUSE ITS DISCRETION BY LIMITING CROSS EXAMINATION TO RELEVANT TOPICS, NOT SPECULATIVE AND CONFUSING TANGENTIAL ISSUES.....	13
E. CONCLUSION	17

TABLE OF AUTHORITIES

Page

Cases

<i>Chambers v. Mississippi</i> , 410 U.S. 284, 93 S.Ct. 1038 35 L.Ed. 2d 297 (1973)	13
<i>State v. Arrendondo</i> , 188 Wash.2d 244, 394 P.3d 348 (2017)	14
<i>State v. Black</i> , 109 Wash.2d 336, 745 P.2d 12 (1987).....	9
<i>State v. Blair</i> , 3 Wash.App.2d 343, 415 P.3d 1232 (2018).....	13
<i>State v. Brush</i> , 183 Wash.2d 550, 353 P.3d 213 (2015)	8
<i>State v. Cleveland</i> , 58 Wash.App. 634, 794 P.2d 546 (1990).....	11
<i>State v. Darden</i> , 145 Wash.2d 612, 41 P.3d 1189 (2002)	13
<i>State v. Franklin</i> , 180 Wash.2d 371, 377 n.2, 325 P.3d 159 (2014).....	8
<i>State v. Gregory</i> , 158 Wash.2d 759, 786 n. 6, 147 P.3d 1201 (2006)	13
<i>State v. Jones</i> , 168 Wash.2d 713, 230 P.3d 576 (2010)	13, 16
<i>State v. Jones</i> , 67 Wash.2d 506, 408 P.2d 247 (1965)	15
<i>State v. Jones</i> , 71 Wash.App. 798, 863 P.2d 85 (1993).....	9, 12
<i>State v. Lee</i> , 188 Wash.2d 473, 48396 P.3d 316 (2017).....	14

<i>State v. Rafay</i> , 168 Wn.App. 734, 285 P.3d 83 (2012).....	9
<i>State v. Russell</i> , 125 Wash.2d 24, 882 P.2d 747 (1994)	14
<i>State v. Stevens</i> , 58 Wash.App. 478, 794 P.2d 38, <i>review denied</i> , 115 Wash.2d 1025, 802 P.2d 128 (1990).....	10, 11
<i>State v. Thomas</i> , 123 Wn.App. 771, 98 P.3d 1258 (2004)	9

Statutes

RCW 9A.44.020.....	16
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Rules

ER 403	15, 16
ER 607	16
ER 609	15
ER 609(a).....	15
ER 611(b).....	14
ER 702	9

A. ISSUES ON APPEAL

- I. Was the pattern jury instruction defining “prolonged period of time” for the alleged aggravating factors a comment on the evidence requiring a resentencing or retrial on the allegation?
- II. Did the trial court abuse its discretion when it permitted the state’s expert to testify generally on the observable behavior changes in sexually abused children?
- III. Was it abuse of discretion for the trial court to deny defense the opportunity to cross-examine a State’s witness regarding a non-testifying individual’s criminal conviction?

B. BRIEF ANSWER

- I. Yes. Given the state of the law, the trial court did comment on the evidence for a sentencing enhancement, an error that requires remand for resentencing or retrial on that allegation.
- II. No. An expert may testify regarding the behavioral changes in sexually abused children, regardless of whether or not she spoke with the victim. Especially if the testimony is offered to rebut a claim of fabrication, overt or implied.
- III. No. The trial court appropriately limited defense cross-examination to relevant areas of inquiry, designed to

ascertain the defendant's guilt or innocence, not obscure the testimony.

C. STATEMENT OF THE CASE

a. Substantive Facts

Seth Wilcox raped and molested his eleven year-old daughter, O.W. from December 2013, and into January 2014. His then girlfriend, Cindy Reynolds, had just given birth to their son, so he focused his attentions on O.W. He gave O.W. gifts—a cell phone, art supplies, and the same perfume Cindy wore. He would take O.W. to work, collecting garbage at a high-end apartment complex. It was during these work outings he fist kissed O.W., like a boy would kiss a girlfriend. RP vol I, 90; 109; 136.

From that night his attentions progressed. The defendant began climbing the stairs to O.W.'s room, early in the morning to cuddle and move his finger in and out of O.W.'s vagina. RP Vol. I, 95; 139. Sometimes he would rub her boobs, while his finger was moving inside her vagina. RP Vol I, 97. On another occasion, he pulled her pants down and licked her vagina. RP vol I, 98. One time, Wilcox placed his erect penis in her hand. O.W. did not touch any pubic hair, one of his customary, grooming behaviors. RP Vol I, 99-100; 145.

These events ended after Cindy Reynolds heard O.W.'s little sister yell "that's what dad and Cindy do!" RP Vol I, 100-1; 117; 140-42.

Following that exclamation, Wilcox was seen in O.W.'s room adjusting himself, while reaching into his pants. RP vol I, 141.

O.W. became withdrawn and angry; she threw fits, kicked walls. RP vol I, 103; 138-39; 143; 200-1. She hid herself in multiple layers of clothing and her school work. RP vol I, 103; 136-37; 200.

Jamie Barnard left Washington for South Dakota in 2015 with her children. RP vol II, 200. She did not inform Wilcox she was leaving. RP vol II, 203-5.

Eventually, she disclosed portions of the abuse to Cindy Reynolds over Facebook messenger. A criminal investigation was conducted. Barnard confirmed with a nervous O.W. what investigators informed her. RP vol II, 205.

Initially, O.W. lied about the abuse because she was scared of the defendant. RP vol I, 102; RP vol II, 239. She only felt safe enough to discuss the abuse after moving to South Dakota. RP vol I, 102-5; 152. However, no one made O.W. come forward, nor did anyone tell O.W. what to say to investigators. RP vol I, 123-4; RP vol II, 205-6.

b. Procedural and trial facts

Seth Wilcox was charged with two counts of Rape of a child in the first degree and three counts of child molestation in the first degree.

During pre-trial motions, defense counsel objected to the State's proposed expert witness's testimony, not because she was unqualified, but because she did not interview O.W. RP vol I, 54-5. However, defense recognized the purpose of the testimony was to rehabilitate witness credibility. RP vol I, 56. The trial court denied defense motion, finding the testimony was helpful and probative to understanding why a person might make a late disclosure, the suggestibility of children, and the general characteristics or manifestations of sexual abuse, subject to any objections during that testimony. RP vol I, 58. The State's expert testified at the end of evidence.

At trial, defense counsel attempted to persuade the jury to believe Cindy Reynolds and Jamie Barnard—two women who were not friends—convinced O.W. to make up the story. RP vol I, 66-7; 146; 151-52; RP vol II, 209-10; 216; 234-5. Defense made clear everyone knew Cindy Reynolds did not like Wilcox, and that she used these allegations to obtain custody of her son with the defendant. RP vol I, 122; 174; 179-81. Similarly, defense attacked Jamie Barnard, suggesting she could use these allegations to avoid potential kidnapping charges, and assist with any custody dispute. RP vol II, 221-27; 231-34; 244-46.

Question: Would you like to see Mr. Wilcox convicted of this crime.

State: Objection.

Court: Overruled.

Question: would you like to see Mr. Wilcox convicted of this crime?

Answer: all I want is peace for my daughter.

Question: would you gain that if he were convicted of these crimes?

Answer: I don't know.

Question: would it help your current situation with regards to custody if he were convicted of this crime?

Answer: my custody is not in threat.

Question: it's not?

Answer: it is not.

Question: why is that?

Answer: most of my children are old enough to say they don't want to be with him.

Question: that's all that matters in a custody dispute, what the kids favor?

Answer: I guess I have to have faith that my children will remain where they belong.

Question: Okay, so yes or no, do you think that would benefit you, or do you think that would hurt you in a custody dispute?

Answer: I'm not a lawyer, I don't know.

Question: If he were convicted of this crime, would he be a sex offender?

Answer: that would make sense.

Question: Okay. Do you think it would hurt his chances of having custody and at least more frequent visitation than he's had over the last four years, would that hurt if he were a sex offender?

Answer: probably.

Question: probably. And that would be to your advantage; wouldn't it?

Answer: I have already established having my children and safety for my children. None of this is necessary.

Question: through the court, have you gained safety and custody for your children or just through your own actions?

Answer: through my own actions.

Question: Okay, so officially would your situation be better if he were convicted of these crimes and a registered sex offender in regards to through the court system your custody of the children?

Answer: I guess.

RP vol II, 244-46.

Defense went so far as to suggest to Ms. Barnard that Cynthia Reynolds may have committed some impropriety by bringing forward allegations of sexual abuse. RP vol II, 234-5. Finally, defense inquired about O.W.'s ability and willingness to lie. RP vol II, 240.

Following the testimony from O.W., Cindy Reynolds, Jamie Barnard, and the investigating officers, the State provided testimony from forensic interviewer, Kristen Mendez. RP vol II, 295-320. She testified generally about the observable manifestations of child abuse and the reasons for delayed reporting. RP vol II, 298-306. She was clear that no fixed standard of manifestations exists, that a spectrum of observable manifestations or "red flag behaviors" may be exhibited. RP vol II, 299.

Defense attacked O.W.'s credibility through its cross-examination of Mendez.

Question: If someone spent time and effort talking to say a 10 or 11-year-old about how bad somebody was over a long

period of time, would that create a pretty concrete sense in that person as they grew up so that person was in fact bad?

Answer: Well, one of the things that you specified was 10 or 11, and we find that children under eight are most impressionable.

Question: okay.

Answer: and those above eight are less likely to be impressed by that type of thing.

Question: as they get older?

Answer yes.

Question: Okay. What if they have multiple adults in their lives even at the age above eight years old feeding them opinions?

Answer: I suppose it could, but again it's going to depend on the characteristic of the child and what their personality is and how they respond to the people around them.

Question: in your training and experience, can impressionable children be basically convinced of something at those impressionable years? You said eight is kind of the turning point, but nonetheless, to the point where they believe something happened that may not be true?

Answer: And I'm not sure that's something I could answer definitely. It's more of a psychology type—you know, psychologist-type question. What I've seen in my experience is that kids and young children who have had stories told to them over and over again often don't have the details that—they don't have the details unless something has actually happened. Because they're the only ones that have witnessed those details, right, with an alleged offender.

RP vol II, 311-13.

Mr. Wilcox was convicted of two counts Rape of a Child in the First Degree, Domestic Violence, and three counts of Child Molestation in the

First Degree, Domestic Violence. A jury returned a verdict of guilty on all counts, and found the offenses were a pattern of abuse.

D. ARGUMENT

I. The defendant should be resentenced because the pattern jury instruction defining prolonged period, an element of the two aggravating factor, commented on the evidence.

The State concedes this issue. Although the trial court had other grounds for which it could have imposed an exceptional sentence, primarily the defendant's criminal score ensures that one of the charges went unpunished, it based its decision on the jury's findings of both aggravating factors. Under *State v. Brush*, 183 Wash.2d 550, 353 P.3d 213 (2015), the definitions provided to the jury for those factors were a comment on the evidence because the alleged time frame was a month in duration and the State cannot show no prejudice resulted. *Brush*, 183 Wash.2d at 559. He should be returned for resentencing on this matter. *Brush*, 183 Wash.2d at 559-61, 353 P.3d 213.

II. The trial court did not abuse its discretion when admitting expert testimony on the general behavioral effects on victims of child sexual abuse.

The admission of evidence is within the trial court's discretion and will not be reversed on appeal absent an abuse of discretion. *State v. Franklin*, 180 Wash.2d 371, 377 n.2, 325 P.3d 159 (2014). The trial court's

discretion is broad and should not be reversed unless its decision rests on unreasonable or untenable grounds. *State v. Rafay*, 168 Wn.App. 734, 783-84, 285 P.3d 83 (2012).

Expert testimony is admissible under ER 702

If scientific, technical, or other specialized knowledge will assist the trier of fact to understand the evidence or to determine a fact at issue, a witness qualified as an expert by knowledge, skill, experience, training, or education, may testify thereto in the form of an opinion or otherwise.

Expert Testimony is helpful if it concerns matters beyond the common knowledge of the average layperson and does not mislead the jury. *State v. Thomas*, 123 Wn.App. 771, 778, 98 P.3d 1258 (2004).

An expert's scientific or technical testimony must be based upon a scientific principle or explanatory theory that has gained general acceptance in the scientific community. *State v. Jones*, 71 Wash.App. 798, 814, 863 P.2d 85 (1993) (*citing State v. Black*, 109 Wash.2d 336, 342, 745 P.2d 12 (1987)). However, if expert testimony does not concern novel theories of sophisticated or technical matters, it need not meet the stringent requirements for general scientific acceptance. *Jones*, 71 Wash.App at 815. Testimony may be based on training, experience, professional observations, and acquired knowledge. *Id.*

Here, the trial court did not abuse its discretion by permitting the State's expert to testify generally about her observations on the behaviors often exhibited by sexually abused children, without first interviewing the victim. The trial court determined the testimony would be helpful understand facts at issue, specifically delayed reporting, physical manifestations, and suggestibility. RP vol I, 57-8.

Ms. Mendez's testimony was limited to what she knew based on her training and experience. In fact, Ms. Mendez requested to not meet the defendant's victim because it was important for her to remain neutral, for her to speak from her knowledge and experience, not from something she might have observed in the victim's interview. RP Vol. II, 306. Her testimony was used to rebut defense assertions that the defendant's ex-girlfriends and mothers of his children conspired against him to obtain sole custody of their children, which directly impugned the veracity of the victim's testimony.

In *State v. Stevens*, 58 Wash.App. 478, 794 P.2d 38, *review denied*, 115 Wash.2d 1025, 802 P.2d 128 (1990), the court approved the use of expert testify generally describing the behaviors of sexually abused children. The expert did not testify that the victim in that case fit that profile. *Stevens*, 58 Wash.App. at 497, 794 P.2d 38. The court affirmed the

admissibility of the testimony, noting it was not used to directly prove an element of the crime.

In *State v. Cleveland*, 58 Wash.App. 634, 794 P.2d 546 (1990), the Court held that it was not error to admit the testimony of a family therapist, who had not met the victim of indecent liberties and statutory rape before testifying, regarding typical behavior of child victims of sexual abuse. *Cleveland*, 58 Wash.App. at 644.

Similar to the expert in *Cleveland*, whether testifying as a forensic examiner or as a therapist, Mendez's work is primarily with sexually abused children. She testified based on her experience and observation. RP vol. II, 295-98. Mendez's testimony did not advocate a position, espouse a theory, or opine on the defendant's guilt or innocence. 58 Wash.App. at 646; see *Stevens*, 58 Wash.App. at 497. Indeed, she acknowledged that no set recipe of indicators of abuse existed. RP 299.

As the Court in *Cleveland* described, Mendez's testimony was "really not theory or opinion requiring acceptance by the scientific community by ER 702. [Her] testimony was essentially a description of her personal observations of some of the characteristics of child sex abuse victims. Her observations are comparable to testimony of a physician describing characteristics [she] has personally observed in [her] treatment of a particular injury or disease." 58 Wash.App. at 646, 794 P.2d 546.

In *State v. Jones*, the court held that generalized testimony of the nature of testimony such as that of Mendez's, if limited to the witness's observations of a specific group, is not bound by *Frye*. 71 Wash.App. at 818. Indeed, the Court agreed that testimony on general behavioral characteristics may be used to rebut allegations by the defendant that the victim's behavior is inconsistent with abuse. *Id.* at 819. That was the very purpose of Mendez's testimony—to rebut defense allegations that O.W.'s testimony was not consistent with sexual abuse, rather it was the result of a frame job, jointly executed by Wilcox's ex-partners. Mendez was the State's final witness.

Here, defense counsel did not object to the foundation of the testimony, only that the witness did not speak with the victim. Given the circumstances and subject matter of the testimony, the presentation of a neutral witness, providing her general observations, is preferable to a witness who spent time with the victim, intent on determining whether or not the victim fit a certain model. The witness did not prevent Wilcox from presenting a defense; in fact, counsel used Mendez to attack the credibility of three of the State's witnesses. Consequently, defendant has not shown the trial court abused its discretion by permitting the State's expert to testify generally about the effects of child sexual abuse and delayed reporting, at the end of the State's evidence.

III. The trial court did not abuse its discretion by limiting cross examination to relevant topics, not speculative and confusing tangential issues.

A defendant has a right to due process, which includes the right to confront and cross examine the witnesses against him. *State v. Jones*, 168 Wash.2d 713, 720, 230 P.3d 576 (2010). These rights are not absolute. Evidence that a defendant wishes to introduce must be of minimal relevance. *State v. Darden*, 145 Wash.2d 612, 622, 41 P.3d 1189 (2002). Defendants do not have a constitutional right to present irrelevant evidence. *State v. Gregory*, 158 Wash.2d 759, 786 n. 6, 147 P.3d 1201 (2006).

If the trial court determines the evidence relevant, the State must then show the evidence is so prejudicial as to disrupt the fairness of the fact-finding process. This will then be balanced against the defendant's need to introduce the evidence. If the State's interest outweighs the defendant's need, the evidence will not be entered. *Darden*, 145 Wash.2d at 622. The defendant's right to present a defense is subject to "established rules of procedure and evidence designed to assure both fairness and reliability in the ascertainment of guilt and innocence." *State v. Blair*, 3 Wash.App.2d 343, 350, 415 P.3d 1232 (2018) quoting *Chambers v. Mississippi*, 410 U.S. 284, 302, 93 S.Ct. 1038 35 L.Ed. 2d 297 (1973).

Limitations of the scope of cross-examination are reviewed for an abuse of discretion. *State v. Lee*, 188 Wash.2d 473, 486, 396 P.3d 316

(2017). The scope of such cross examination remains within the discretion of the trial court. *State v. Russell*, 125 Wash.2d 24, 92, 882 P.2d 747 (1994). Consequently, courts give greater deference to trial courts when they limit the scope of questioning. *Blair*, 3 Wash.App.2d at 350, 415 P.3d 1232, citing *State v. Arrendondo*, 188 Wash.2d 244, 265-66, 394 P.3d 348 (2017).

Here, the trial did not abuse its discretion by limiting defense cross examination. In fact, unlike defendant suggests, the court permitted inquiry into whether or not Jamie Barnard knew of the registration requirements of sex offenders. During motions in limine, defense did not inform the trial court it was armed with contradictory evidence, only that it wanted to ask questions about her knowledge of those requirements and about her significant other's 2002 conviction for sexual misconduct with a 16-year-old. The trial court rightfully limited the scope of defense counsel's inquiry because it was vague in nature.

ER 611(b) directs the process and limitation of cross examination:

(b) Scope of Cross Examination. Cross examination should be limited to the subject matter of the direct examination and matters affecting the credibility of the witness. The court may, in the exercise of discretion, permit inquiry into additional matters as if on direct examination.

When cross-examination seeks to impeach a witness on the basis of credibility, "the evidence sought to be elicited must be relevant to the matters sought to be proved and specific enough to be free from vagueness."

State v. Jones, 67 Wash.2d 506, 512, 408 P.2d 247 (1965). Here, a non-testifying individual's conviction for a sex offense was irrelevant, and any inquiry into that matter was designed to inflame the prejudices of the jury and to cause confusion. ER 403.

Defendant argues his constitutional guarantee to present a defense was violated, making the specious argument he could have impeached Jamie Barnard with another person's conviction. Impeachment with convictions is limited to those admissible under ER 609, which limits impeachment of a witness to only her convictions. ER 609(a) states clearly that

“for the purpose of attacking the credibility of a witness in a criminal or civil case, evidence that *the witness* has been convicted of a crime shall be admitted...” (Emphasis added).

Furthermore, defendant's argument assumes that Ms. Barnard knew every aspect of her significant other's conviction, and was versed in the registration process and requirements. However, defense counsel did not provide evidence to prove these assumptions. Consequently, the spuriousness of the inquiry was too great to convince the trial court the testimony would contribute to the effective ascertainment of the truth. *Blair*, 3 Wash.App. 2d at 354. Perhaps had the defendant been equipped with evidence to support this claim, he could have properly impeached Jamie

Barnard by presenting evidence of contradiction, through ER 607. He was not.

Defendant argues *State v. Jones*, 168 Wash.2d 713, controls this issue. However, *Jones* is inapposite. There the trial court wrongfully excluded evidence of prior consent through its own misinterpretation of the Rape Shield statute, RCW 9A.44.020, which was the defendant's entire defense, not mud. 168 Wash.2d at 721. Here, the court performed the appropriate ER 403 balancing test, and did not exclude evidence based on a faulty legal understanding. RP Vol I, 66-9. The trial court considered the defendant's desire to attempt impeachment of Jamie Barnard, exposing a bias, and allowed defense counsel to inquire whether she knew of the registration requirements associated with sex offenders. RP Vol I, 69. The trial court limited that inquiry for fear it was tangential and confused the issues. RP Vol I, 70.

At trial, defense counsel made the inquiry of Ms. Barnard after exposing the fact she took her children without notifying the defendant. Defense counsel asked Jamie Barnard if her situation would improve if the defendant were convicted. RP Vol II, 242-6. She guessed it would. Defense then asked Jamie Barnard if she was familiar with the requirements of sex offender registration, and she answered "not really." RP Vol II, 246. This line of questioning clearly exposed Ms. Barnard's bias and made reasonable

the argument she had skin in the game. Furthermore, defense counsel during both cross-examination and closing argument, highlighted the fact Ms. Barnard removed her children from the State of Washington without notifying the defendant, and because of this unlawful act conducted malicious prosecution. The trial court permitted this inquiry and argument because it was supported by the evidence.

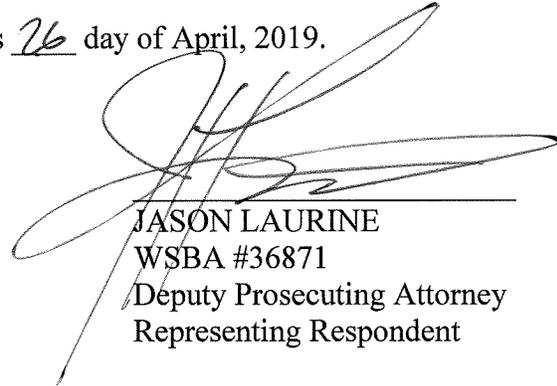
Defendant's defense was general denial, supported by a theory that two women and a young girl concocted a story to frame him for rape charges. He was permitted to make the appropriate inquiries and argue his defense. The trial court did not abuse its discretion by limiting him to provable, relevant information. Consequently, his claim should fail.

E. CONCLUSION

Wilcox has not shown the trial court abused its discretion by limiting cross examination to provable evidence. Furthermore, Wilcox has not shown the trial court abused its discretion by first finding that generalized, expert testimony presented at the end of the State's case would be helpful to the jury. For the above reasons, Wilcox fails on the substantive issues.

However, this case should be remanded for resentencing, because the trial court's definition to the jury was in error.

Respectfully submitted this 26 day of April, 2019.



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I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

Signed at Kelso, Washington on April 26th, 2019.

Michelle Sasser
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COWLITZ COUNTY PROSECUTING ATTORNEY'S OFFICE

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