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Division II
State of Washington
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IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION II

STATE OF WASHINGTON,

Appellant,

v.

TOMMY ROSS,

Respondent.

ON APPEAL FROM THE SUPERIOR COURT OF
CLALLAM COUNTY, STATE OF WASHINGTON
Superior Court No. 5063

REPLY BRIEF OF APPELLANT

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I. ARGUMENT IN REPLY

Ross concentrates his response on the cause of delay, attributing it solely upon the State. “The *Barker* factors are not exclusive, and no individual factor is necessary or sufficient.” *State v. Rafay*, 168 Wn. App. 734, 772, 285 P.3d 83 (2012) (citing *State v. Iniguez*, 167 Wn.2d 273, 283, 217 P.3d 768 (2009)).

Ross also alleges that the State did not ever diligently seek to have Ross brought back from Canada to face trial. However, Ross ignores the fact that he never asserted his right to a speedy trial and that he acquiesced in the delay. *See Barker v. Wingo*, 407 U.S. 514, 531–32, 92 S.Ct. 2182, 2192–93, 33 L.Ed.2d 101 (1972) (“[F]ailure to assert the right will make it difficult for a defendant to prove that he was denied a speedy trial.”); *see also McConahy*, 505 F.2d 770, 773 (7th Cir. 1974) (applying *Smith v. Hooey*, 393 U.S. 374, 383, 89 S.Ct. 575, 579, 21 L.Ed.2d 607 (1969) (A clear reading of *McConahy* shows that a diligent effort to return a defendant to the United States for trial is required when the defendant requests his return or asserts his right to a speedy trial, unless efforts would be futile, or the defendant fails to make his demand).

Furthermore, allegations of bad faith and purposeful delay in order to hamper the defense are not warranted by the record. Finally, Ross argues this Court should simply defer to the trial court’s finding of prejudice. This

ignores the de novo standard of review for an alleged constitutional violation of speedy trial. A presumption of prejudice is persuasively rebutted by the record.

A. AN ALLEGED FAILURE TO OBTAIN A FORMAL AGREEMENT WITH CROWN COUNSEL AND WAIVER OF EXTRADITION FROM ROSS, THE QUASHING OF THE WARRANT IN 1987, AND FAILURE TO SEEK TO BORROW ROSS AFTER 2003 DID NOT CAUSE DELAY IN BRINGING ROSS TO TRIAL.

Ross attributes delay to Mr. Meiner's decision to allow Canada to prosecute its case first without obtaining a formal agreement for Ross's return or a waiver of extradition. Ross also singles out prosecutor Mr. Meiner's opposition to Mr. Shea's (Ross's appointed attorney) motion to compel discovery as evidence Meiner used the delay for the purpose of hampering the defense. Ross also alludes to prosecutor Mr. Bruneau's decision to quash the arrest warrant in 1987, and prosecutor Ms. Kelly's failure to seek to borrow Ross from Canada under the new extradition treaty in 2003, and an objection to Ross's release on parole as further causes of delay.

1. Mr. Meiner's decision to allow Ross to be prosecuted by Canada first was not made in bad faith and should not be weighed heavily against the State.

Ross argues that Mr. Meiner did not seek a waiver of extradition or have a formal agreement with Canadian Crown Counsel for Ross's return

regardless of the outcome. This argument ignores Mr. Meiner's declaration which was admitted in the record. CP 201-02, 210, 217, 235.

It was Crown Counsel Anthony that contacted Meiner and requested Meiner to release the Ross on the Clallam County hold. CP 201. Meiner called Anthony and they agreed that Ross would be returned to Clallam County at no cost if Meiner agreed to authorize Ross's release from the Clallam County hold so that Ross could be tried in Victoria first. This was an agreement.

Meiner released Ross to Canadian authorities and Crown Counsel Anthony. CP 212. It is not clear what a formal agreement with Crown Counsel Anthony would have looked like or what effect it would have had. Crown Counsel Anthony was an officer of the court and yet his word had no impact on Canada's later decision to retain Ross until his sentence was served. There is no evidence that a "formal" agreement between Anthony and Meiner would have had any effect. Canadian authorities could have simply taken the position that the agreement could not be enforced.

Further, a waiver of extradition by Ross would very likely not have had any effect in this case. There is no evidence that Canada would have changed its policy decision to keep Ross until his sentence was served had Ross waived his extradition rights.

Ross cites to *People v. Stanitz*, to suggest that mere decision to

relinquish Ross to Canada should be held and weighed heavily against the State despite Meiner's agreement with any Canadian authority that Ross would be returned to Clallam County in a timely manner. *People v. Stanitz*, 857 N.E.2d 288, 293 (Ill. App. 2006).

Stanitz does not apply within a constitutional speedy trial analysis because it dealt solely with a statutory violation of a right to trial within 120 days rather than a constitutional violation of a speedy trial right in which tolling is not relevant because there is no definite speedy trial clock. *Barker v. Wingo*, 407 U.S. 514, 523, 92 S.Ct. 2182, 2188, 33 L.Ed.2d 101 (1972) ("We find no constitutional basis for holding that the speedy trial right can be quantified into a specified number of days or months.").

In *Stanitz*, the defendant was already in State custody and the statutory 120-day speedy trial rule was already triggered before the State voluntarily surrendered the defendant to Federal custody. The *Stanitz* Court essentially held that the 120-day speedy trial rule was not tolled by voluntarily surrendering the defendant to Federal custody. *People v. Stanitz*, 857 N.E.2d 288, 290 (Ill. App. 2006).

Thus, the constitutional speedy trial rule was not at issue at all in *Stanitz*. Ross cites no authority that the mere decision to allow another jurisdiction to proceed with its prosecution first necessarily violates a defendant's *constitutional* speedy trial right.

Ross also cites to *U.S. v. McConahy*, 505 F.2d 770 (7th Cir. 1974) incorrectly by asserting that “[b]ecause [the State] never meaningfully tried to bring the defendant back to the United States, the court held that the defendant’s right to a speedy trial was denied.” Br. of Respondent at 14–15. This reading is incomplete.

A clear reading of *McConahy* shows that a diligent effort to return a defendant to the United States for trial is required when the defendant requests his return or asserts his right to a speedy trial, unless efforts would be futile, or the defendant fails to make his demand. *U.S. v. McConahy*, 505 F.2d 770, 773 (7th Cir. 1974) (applying *Smith v. Hooey*, 393 U.S. 374, 383, 89 S.Ct. 575, 579, 21 L.Ed.2d 607 (1969) (“*Upon the petitioner's demand, Texas had a constitutional duty to make a diligent, good-faith effort to bring him before the Harris County court for trial.*”) (emphasis added)).

The *McConahy* Court held the government violated McConahy’s speedy trial right because it did not make a good faith diligent effort to bring the defendant back to the United States for trial *after McConahy made a demand*.

Here, Ross never made such a demand. Meiner’s mere decision to allow Canada to bring Ross to trial first should not be weighed against the State as it was a legitimate prosecutorial decision which Meiner determined would benefit the State’s case.

2. **Although Ross never asserted his right to a speedy trial, Mr. Meiner exercised due diligence by requesting Canadian authorities to honor Crown Counsel’s agreement to send Ross back to Clallam County after his trial, only to be rebuffed.**

Here, the record demonstrates that Mr. Meiner did request that Ross be returned to Clallam County and informed the new Crown Counsel that he would be moving forward with extradition proceedings. CP 204, 221. The record demonstrates that Mr. Meiner was informed by Crown Counsel, R.D. Law in Victoria, that if Meiner made a formal request for extradition that Ross would be required to serve out his minimum 25-year sentence. CP 204, 224, 232, 238. Meiner was also presented with the possibility that Ross could be extradited earlier if released on parole before the completion of 25 years if Meiner did not initiate formal extradition proceedings. CP 205–06, 225.

Ross also cites to *People v. Romeo*, 12 N.Y.3d 51, 54, 904 N.E.2d 802 (2009) for the proposition that the State must make a diligent good faith effort to secure the presences of a defendant for trial when the defendant is serving a sentence outside the country. *Romeo* is clearly distinguishable from the facts of this case.

The *Romeo* Court, immediately after stating the principle cited above, expressly recognized a futility exception. *Id.* at 57. “Of course, where the foreign country demonstrates its clear intention to deny an extradition request, the People are under no obligation to make a futile gesture.” *Id.* at

57. The *Romeo* Court found that the State did not exercise its good faith duty to secure the presence of the defendant to bring him to trial because the State made no request for extradition and there was nothing in the record demonstrating that an extradition request would have been futile. *Id.* at 57. Furthermore, Romeo made repeatedly asserted his right to a speedy trial. *Id.* at 54.

Here, the record shows that efforts to extradite Ross would have been futile and possibly even damaging to the State's efforts. Moreover, unlike the instant case, in *People v. Romeo*, the defendant repeatedly asserted his right to a speedy trial beginning within a few days of being indicted on two counts of Murder. *Id.* at 54. Here, Ross did not.

Therefore, *Romeo* does not apply to the facts of this case and Meiner made good faith efforts to have Ross sent back to Clallam County for trial notwithstanding the fact that Ross never asserted his rights to a speedy trial.

- 3. Meiner's decision to oppose the motion to compel discovery was not an effort to use the delay for the purpose of hampering Ross's defense because Meiner was not yet aware there would be an unanticipated delay and discovery would be provided in a timely manner once the case proceeded.**

Ross argues that Meiner used the delay to hamper the defense. As evidence for this argument, Ross alludes to Meiner's opposition on June 15, 1979 to providing discovery at Mr. Shea's (Ross's appointed counsel) request. This argument fails because the record shows that Meiner did not

expect there to be any delay after the Victoria trial when he objected to providing discovery prematurely. CP 128–29.

It wasn't until after the hearing for the motion to compel discovery that Meiner was even aware that Canada might not follow through with Crown Counsel Anthony's agreement to return Ross to Clallam County. This is shown by Meiner's letter, dated June 18, 1979, in which Meiner wrote to remind new Crown Counsel, Richard Law, that Crown Counsel Anthony agreed that Ross would be delivered to Clallam County immediately after the conclusion of the trial in Victoria. CP 203.

In response, Regional Crown Counsel informed Meiner in a letter dated July 4, 1979, that former Crown Counsel Mr. Anthony was no longer employed by the Ministry of Attorney-General, and that the current position of the Ministry that "in the event of conviction and sentencing in [Victoria], there are no legal means with which they are familiar or have discovered, to execute the apparent undertaking given to return Ross to American jurisdiction, while any such sentence remains unserved." CP 203.

Thus, on June 15, 1979, Meiner was still expecting Ross to be returned to Clallam County directly after his murder trial in Victoria which resulted in a conviction just one month later on July 13, 1979. CP 150. This shows that Meiner did not intend to use the delay for the purpose of hampering the defense by objecting to the motion to compel discovery

because the delay was not yet anticipated.

Further, the opposition to the motion to compel discovery had no role in creating any delay in this case. When Meiner agreed to let Victoria proceed first, there was no motion to compel discovery before him. Further, when Meiner did oppose the motion to compel discovery some months later, it was in part because Ross had not yet made his appearance and had not entered a plea and the provision of discovery was premature under the court rules. CP 128–29. Additionally, the State was still building its case and would be seeking fingerprints and hair samples and thus discovery was not yet complete. CP 129.

Meiner stated in his declaration that he allowed Victoria to proceed first because it would be beneficial for the State's case which Meiner perceived to be the weaker of the two. CP 203. The State had every right to build its case before proceeding and there is no statute of limitations expiration for a murder charge. *See generally, Doggett v. U.S.*, 505 U.S. 647, 659, 112 S.Ct. 2686, 120 L.Ed.2d 520 (1992) (Justice THOMAS, with whom THE CHIEF JUSTICE and Justice SCALIA join, dissenting).

Taking time to build a stronger case is certainly not tantamount to delay for the purpose of hampering the defense. Had the State simply dismissed its case without prejudice and re-filed when it was ready to proceed, perhaps there would be no violation of a speedy trial argument to

make at all. Under that scenario, re-filing later and providing discovery as required under the court rules could not be argued to be for the purpose of hampering the defense. This case is not so different as Meiner had no intent for there to be any exceptional delay after the Victoria trial which occurred only six months after his decision to allow Victoria to proceed first.

The record shows that Meiner did not use the unanticipated delay to hamper Ross's ability to present a defense in this case by objecting to premature discovery.

4. Clallam County Prosecuting Attorney Deb Kelly's was concerned with managing a large case load with an understaffed office and this is a neutral reason for further delay.

In 2003, Clallam County Prosecuting Attorney Deborah Kelly was contacted by Sylvia Bordelais who represented Ross. CP 272–273, 276. Although there was no demand for a speedy trial, Ross was inquiring whether the State would take the death penalty off the table if he agreed to return to Clallam County. CP 275. Ms. Kelly was not enthusiastic about bringing back a cold twenty-five-year-old murder case due to budget cuts which forced a reduction in the number of deputy prosecutors. CP 273. This is a neutral reason for further delay. *Strunk v. United States*, 412 U.S. 434, 436, 93 S.Ct. 2260, 37 L.Ed.2d 56 (1973) (understaffed prosecutor's office is a neutral reason for delay).

Kelly did not express misinformed opposition to Bordelais or mislead

her to believe that the death penalty was still viable. Kelly clearly pointed out that she was not sure whether the death penalty was viable, but that if it was, she would not take it off the table. CP 274. Moreover, Kelly is sure that she expressed to Bordelais that if the death penalty was not viable, she would be forced to remove it. CP 274.

Finally, the change in the extradition treaty protocols in 2003 allowing for “borrowing” still depended upon a discretionary decision on the part of Canada. CP 354. This was no different than in 1971. Canada could have made similar arrangements to allow Ross to be temporarily surrendered in 1971 but did not see fit to do so. Canadian authorities had already made a decision to keep Ross until his sentence was served or he was released on parole. Ross was not released on parole until 2016.

Ross cites *U.S. v. Pomeroy*, 822 F.2d 718 (8th Cir. 1987) where the government’s case was dismissed because it did not seek to borrow the defendant under the current extradition treaty with Canada. Ross ignores that Pomeroy requested extradition to North Dakota to stand trial. *Id.* at 719. Pomeroy demanded his right to a speedy trial. Here, Ross did not. Therefore, *Pomeroy* does not apply.

Kelly’s decision to not pursue Ross’s case at the time should not be held heavily against the State as Ross acquiesced in delay and never asserted his right to a speedy trial.

5. Ross, with knowledge of Clallam County’s arrest warrant, had the opportunity to return for trial but withdrew his request for a transfer to the U.S.

Ross argues that the State did not have a warrant in place for 30 years and was not inclined to press its charges because it did not register its warrant.

Although Prosecutor Bruneau had the arrest warrant withdrawn in Nov. 1987 because he had not had time yet to review the case and assess viability of prosecution (CP 2454), Bruneau applied to have the warrant re-issued in 1988 and amended the information amended after he reviewed the case file. CP 2431, 2438–44, 2445–49, 2450. There is no evidence that the after the State successfully applies to the court to issue an arrest warrant, that the prosecutor’s office, rather than the clerk’s office, must take further action to “register” the court’s order for arrest. Furthermore, it appears from the record that the warrant was effective to some degree.

For example, in 2007, Ross was aware of the Clallam County warrant when he applied for a transfer of his sentence to the United States. CP 190–93, 195–967, 213, 284–86; State’s Ex. D at 8–11. The request was approved, and Ross was appointed counsel, Mr. Hillier, to advise Ross on the matter. A hearing was held, and Ross confirmed with the magistrate that he was aware of the Clallam County arrest warrant. CP 169–70. The magistrate informed Ross that he would likely have to answer to the warrant in Clallam County if

he was returned to the U.S. CP 170. Ross withdrew his request for transfer. CP 186.

Additionally, Ross states that he was informed by his attorney, Mr. Hillier, when Clallam County's arrest warrant was withdrawn. The record of this communication shows that the warrant for Ross's arrest was not withdrawn until 2014. CP 400.

Regardless, Ross could have complained of his right to a speedy trial or demanded to be returned for trial regardless of whether there was an outstanding warrant or not, but this was not his interest.

6. The quashing of the warrant in 2014 and opposition to parole for Ross in 2016 had no bearing on the delay.

Ross argues that the quashing of the warrant in 2014 was evidence of the State's lack of diligence in bringing Ross to trial. This argument still ignores that Ross acquiesced in delay and never asserted his rights to a speedy trial.

Ross also points out that the State opposed Ross's parole in 2016 which would be the only way for Ross to be returned to the U.S. outside of extradition proceedings. Still, this argument ignores that Ross acquiesced in delay and never asserted his right to a speedy trial. Moreover, the opposition to parole did not contribute to further delay as Ross was ultimately released on parole despite the State's objection. Additionally, the State was

immediately ready to receive Ross after his release and bring him to Clallam County to face trial.

B. THE RECORD SHOWS THAT ROSS'S ABILITY TO MOUNT A DEFENSE WAS NOT PREJUDICED.

Ross argues that the trial court was in the best decision to know whether his defense was impaired by delay and that this Court should therefore simply defer to the court's finding of prejudice. Br. of Respondent at 39–40. This is not the standard of review.

A claim of a violation of a constitutional speedy trial is reviewed de novo. *State v. Ollivier*, 178 Wn.2d 813, 826, 312 P.3d 1 (2013) (citing *State v. Iniguez*, 167 Wn.2d 273, 280, 217 P.3d 768 (2009)). Even where the trial court's findings of fact are considered, they are only left undisturbed when challenged if they are supported by substantial evidence. *State v. Halstien*, 122 Wn.2d 109, 129, 857 P.2d 270 (1993) (“Substantial evidence exists where the record contains a sufficient quantity of evidence to persuade a fair-minded, rational person of the truth of the allegation.”).

Here, the trial court's findings in regard to prejudice are not supported by the record as argued in the State's opening brief. Br. of Appellant at 33–42. The State has pointed out the relevant record refuting each of the findings regarding prejudice to the defendant's ability to mount a defense. This Court need not simply defer to the trial court's conclusion that there was prejudice

weighing in favor of the defendant in the speedy trial analysis when such findings are not supported by the record, or as in this case, the record demonstrates otherwise, and the findings are rebutted. *Doggett v. U.S.*, 505 U.S. 647, 648, 112 S.Ct. 2686, 2688, 120 L.Ed.2d 520 (1992) (showing that a presumption of prejudice may be extenuated by acquiescence to delay or rebutted).

Moreover, a presumption of prejudice alone is not sufficient for a finding of a violation of a speedy trial. *State v. Rafay*, 168 Wn. App. 734, 774, 285 P.3d 83 (2012) (“A claim of presumptive prejudice alone, without regard to the other *Barker* criteria, is insufficient to establish a Sixth Amendment violation.”).

Finally, allegations that the integrity of the State’s case is somehow marred are not warranted. Ross eludes to Ms. Kelly’s statement of Ross “hating white women.” Br. of Respondent at 41. Ross fails to mention that the statement originated from the statements by Ross’s brothers documented in police reports. CP 1120.

The claim that detectives involved in the investigation drew a racist caricature in their interview notes is not accurate. The State had pointed out that the caricature was drawn by Prosecuting Attorney Bruneau after reviewing the interview notes, not the investigative detectives. Prosecutor Kelly acknowledged the caricature as highly offensive, inappropriate and

indefensible. State's Response Memorandum Re: plea negotiations, index # 248, filed Jan. 29, 2018, at 1. Bruneau was not the prosecutor that filed the initial charges and had no role in the investigation. Bruneau was only present at the 1988 interview because Ross requested his presence. *Id.* at 2.

II. CONCLUSION

The weighing of all relevant factors in the speedy trial analysis show multiple causes for delay, included Ross's own actions which led to his murder conviction and subsequent imprisonment in Canada. Ultimately, Ross acquiesced in delay and never asserted his right to a speedy trial. Presumptive prejudice from delay is rebutted by the record. *See* Br. of Appellant at 31–42.

For the foregoing reasons, the Court should reverse the trial court's decision finding that the State violated Ross's constitutional right to a speedy trial and order dismissing the case.

Respectfully submitted this 11th day of February, 2019.

Respectfully submitted,

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Deputy Prosecuting Attorney

CERTIFICATE OF DELIVERY

Jesse Espinoza, under penalty of perjury under the laws of the State of Washington, does hereby swear or affirm that a copy of this document was forwarded electronically or mailed to Nancy Collins on February 11, 2019.

MARK B. NICHOLS, Prosecutor

Jesse Espinoza

CLALLAM COUNTY DEPUTY PROSECUTING ATTORN

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