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

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STATE OF WASHINGTON,

Respondent,

v.

CHRISTOPHER MICHAEL BROWN,

Appellant.

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Appeal from the Superior Court of Pierce County  
The Honorable James Orlando, Judge

No. 17-1-04803-0

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**BRIEF OF RESPONDENT**

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## I. INTRODUCTION

The Defendant Christopher Brown was charged with possessing a stolen car after he was seen running a stop sign, speeding from police, and fleeing from the stolen vehicle. Officer Feldman identified the Defendant as the driver he had followed and the runner he had chased. The Defendant also left his cell phone, backpack, and notebook in the stolen car.

On the night of the Defendant's arrest, Michelle Nolasco repeatedly told police that the Defendant had not been in her room or with her that night. At trial, however, she claimed that he had been with her in her motel room watching television and eating pizza. Ms. Nolasco was engaged to the Defendant's brother and a close friend to the Defendant.

In cross-examination, the prosecutor pointed out that, despite this relationship and despite knowing that the Defendant had been charged, Ms. Nolasco did not approach police or the prosecution to provide an alibi at any time in the nine months prior to trial. The Defendant objected, arguing that the witness had no "duties to be investigating the case." The prosecutor began to respond, only to be interrupted by the court overruling the defense objection.

On appeal, the Defendant argues that the prosecutor's aborted response ("Your Honor, I believe there is-") amounts to a claim that the witness had a legal duty to come forward which defense counsel should

have objected to. He argues that the trial judge endorsed that the witness had a duty to come forward by overruling the defense objection.

This interpretation of the record is unreasonable. The defense objection had not suggested the prosecutor was arguing a duty to report, but a duty to investigate. The prosecutor never used the word “duty” in the record and did not endorse either a legal duty to report or investigate in closing argument. The factual premise underlying the claim on appeal does not exist.

## **II. RESTATEMENT OF THE ISSUES**

- A. Is the Defendant’s interpretation of the record reasonable? (Appellant’s Assignment of Error 1).
- B. Was trial counsel ineffective for failing to impute an argument to the prosecutor which the prosecutor had not made? (Appellant’s Assignment of Error 2).
- C. Where the Defendant has not challenged the CrR 3.5 ruling and made no argument challenging the recently filed Findings and Conclusions, is there any issue remaining in this appeal? (Appellant’s Assignment of Error 3).

## **III. STATEMENT OF THE CASE**

The Defendant/Appellant Christopher Michael Brown has been convicted by a jury of possessing a stolen vehicle and driving with a suspended license (DWLS-3). CP 3-4, 60-62, 68, 79.

Lakewood Police Officer Jordan Feldman saw a silver Honda CRV run a stop sign, forcing another vehicle to brake hard to avoid a collision.

RP 209-10. With the patrol officer in pursuit, the Honda accelerated to 50 mph in a 25 mph zone before turning into an apartment complex. RP 207-12. There the officer attempted to initiate a traffic stop, but the SUV continued through the complex parking lot until the driver fled, leaving the car still in drive. RP 212. The driver looked back at Ofc. Feldman before darting through a hole in the fence and running through an alley toward an adjacent apartment complex. RP 218, 225-26. The officer observed the driver was a black male of medium height with a stubbly beard wearing a bright white jacket. RP 218-19. Ofc. Feldman gave chase on foot. RP 212-13, 220.

After the empty Honda rolled into the fence, Sergeant Jeremy Prater put it in park. RP 212, 222. Sgt. Parker then determined that the license plates had been switched to mask that the Honda had been stolen. RP 190, 243, 276, 312-13. There were two shaved keys inside the stolen car, one in the ignition. RP 228.

When Ofc. Feldman lost the driver, he returned to the vehicle to perform a warranted search. RP 220-22. In the backseat, police found a backpack with the Defendant's name. RP 223, 231, 237. Inside the backpack was a MetroPCS receipt with the Defendant's name and a notebook with a to-do list to "Return Honda" and "make new keys." RP 223, 234, 230-34, 240-41.

A cell phone was found on the ground about 10-15 feet from the car and along the driver's flight path. RP 223-24. Police were able to determine it belonged to the Defendant based on the Facebook message that popped up in the phone's notifications, from Janel Gasper to "Chris Buckle." RP 224-25, 234-35. Ofc. Feldman recognized Ms. Gasper in connection with another stolen car case. RP 224. Ms. Gasper and the Defendant Chris Brown were living together in the same unit in the apartment complex only 10 feet from where the car had been abandoned. RP 225, 241-42. The officer recognized the Defendant as the driver. RP 225-26, 307.

A few hours later, Ofc. Feldman located the Defendant walking on an overpass near the complex and arrested him. RP 245-50. The Defendant was still wearing the white hooded jacket, but he had turned it inside out and covered it up with another layer. RP 246. The Defendant admitted that he had been in the stolen vehicle and that the backpack and cell phone were his, but he claimed that the person who had run from the Honda was "Ace." RP 251-52. Ofc. Feldman was familiar with Ace and testified that the person he chased did not resemble Ace. RP 251-52, 303. It had been the Defendant. RP 225-26, 307.

The Defendant then claimed he had been at the Biltmore Motel for the last several hours and that a woman named Michelle could confirm this. RP 253. Three hours after the car chase, police transported the Defendant

to the motel where they found Michelle. RP 253-54, 300-01, 307. But she repeatedly denied that the Defendant had been with her in her room. RP 254, 301, 307. The Defendant asked the officer to ask Michelle one more time. *Id.* The officer returned to the motel room where Michelle again denied that the Defendant had ever been in her room, but said she had seen him outside another room shortly before the officers arrived. RP 254-55, 302, 307. She said she had only rented the room at 10:00 p.m.. RP 361-62. The Defendant has a history of elaborate lies to avoid prosecution. CP 17 (history of malingering).

The trial took place nine months after the arrest. CP 1-2, 60-62, 68. At jury selection, defense counsel advised that she would be calling a single witness “Michelle” whom they were “still trying to locate.” RP 6. Counsel had not filed a witness list and could not provide the witness’ last name. *Id.* Some days later, the defense asked for a material witness warrant. CP 325. The State objected, noting “Counsel has had an extensive period of time to try to locate this witness if it was imperative.” RP 326. The court observed that the witness “works at the Biltmore hotel, which has been a location that’s been identified here for some time as being directly involved,” and yet defense had failed to file a witness list or issue a subpoena. RP 328-29. The court issued the warrant, and the witness was produced within a few hours. RP 331-32.

Michelle Nolasco testified that she has lived at the Biltmore for almost 17 years where she is employed as a housekeeper. RP 347-48. She is engaged to the Defendant's brother and is close friends with the Defendant. RP 347, 355. She claimed that the Defendant had been in her motel room from 9:30 p.m. to about 1:30 or 2:00 a.m. watching the Big Bang Theory and music videos with her and eating pizza. RP 349. She denied telling the officers that the Defendant had never been in her room. RP 361. She claimed that when police came and knocked on her door, she told them that the Defendant "was here all night" and had just left. RP 351. She claimed the two officers then turned away from her, whispered something, and started laughing "a real evil laugh." RP 351-52. She claims they only spoke with her the one time that night. RP 351, 356.

In cross-examination, Ms. Nolasco contradicted herself, admitting that she had told police that the Defendant was not in the room.

At that point in time, I didn't see Chris Brown in the back of the police car. So, of course, I'm going to say, no, he's not in my room.

RP 362. And she admitted that she had not made efforts to assist her close friend and fiancé's brother by approaching police in the nine months that the case was pending trial. RP 356-57.

Q. And after hearing that Chris was facing these charges, you never contacted our office, correct, the prosecutor's office?

A. I didn't think I would have to. I didn't think I would be up here.

Q. Never submitted a written statement?

A. No.

Q. Never called Lakewood Police Department later on?

MS. CONTRIS: Your Honor, again, I would object to this line of questioning. It's not the witness' duties to be investigating a case.

MR. JONES: Your Honor, I believe there is.

THE COURT: Overruling the objection.

RP 357.

Q. You never actually spoke with anyone about this until Sonia Garcia [defense investigator] contacted you September 6th last week after this trial had started; is that correct, ma'am?

A. Yes.

Q. And I was not there, no one with my office was there; is that correct?

A. No.

Q. No one with the police department?

A. No.

Q. Or any other law enforcement or attorney's office was present?

A. No.

Q. Just the investigator?

A. Yes.

RP 359-60.

In closing argument, the prosecutor asked the jury to consider if any witness was biased or had a reason to lie. RP 386. Ms. Nolasco was testifying on behalf of her future brother-in-law "to protect the family." *Id.*

If you knew you had a family member that is facing charges that you know for a fact are not true, you would want to contact someone, contact police, contact any type of law enforcement, and contact prosecutor's office. ... leave a message. If she gets

nothing else, call 911. State. “I have a family member. He’s been falsely accused of a crime. Can you please steer me in the right direction? Can you help me find someone who I can submit a statement on his behalf, so I can please get in touch with the right person?” No. Nine months passed, nothing, besides when she talked with the defendant about this charge. Nothing until last week when she met with the defense investigator. Only then after this trial began did she meet and provide a statement. ... Ladies and gentlemen, you can draw your own conclusions based on all this, but remember as the law says you, and no one else, are the sole judges of credibility. Is there motive? Is there bias? Ladies and gentlemen, draw your own conclusion as to what we saw today.

RP 387-88.

The Defendant appeals. CP 91.

#### IV. ARGUMENT

**A. The record does not support the Defendant’s premise that the prosecutor endorsed a legal duty of the witness to come forward.**

The Defendant claims that the prosecutor argued that the witness had a legal duty to contact authorities with her alibi statement before trial. Brief of Appellant (BOA) at 11. This is a strawman argument. The prosecutor never once used the word “duty” in reference to the witness.

Allegations of prosecutorial error are reviewed under an abuse of discretion standard. *State v. Lindsay*, 180 Wn.2d 423, 430, 326 P.3d 125 (2014). The prosecutor is entitled to make a fair response to the arguments of defense counsel and may draw reasonable inferences from the evidence. *State v. Stenson*, 132 Wn.2d 668, 729, 940 P.2d 1239 (1997); *State v. Russell*, 125 Wn.2d 24, 87, 882 P.2d 747 (1994).

The defendant bears the burden of proving that the prosecutor's comments were improper and, if so, that they were prejudicial. *Lindsay*, 180 Wn.2d at 431. To establish prejudice, a defendant must show the improper comment had a substantial likelihood of affecting the jury's verdict. *State v. Thorgerson*, 172 Wn.2d 438, 443, 258 P.3d 43 (2011).

When analyzing prejudice, an isolated remark is unlikely to amount to prosecutorial misconduct. *Thorgerson*, 172 Wn.2d at 466. Courts do not consider the alleged improper remark "in isolation, but in the context of the total argument, the issues in the case, the evidence, and the instructions given to the jury." *State v. Warren*, 165 Wn.2d 17, 28, 195 P.3d 940 (2008).

At trial, the Defendant objected to the prosecutor's line of questioning which emphasized the witness' failure to come forward. This line of questioning was proper. It spoke to the credibility of the alibi. But the Defendant does not seek review of this aspect on appeal.

Rather, the Defendant claims that prosecutor alleged a legal duty *by responding to the Defendant's objection* that "It's not the witness' duties to be investigating a case." RP 357. The Defendant did not object to the prosecutor's response or ask the court to instruct the jury on the witness' legal duties. RP 357; BOA at 18. Failure to make a timely objection or to request a curative instruction will waive the claim unless the defendant can show the error was so flagrant and ill-intentioned than an instruction could

not have cured the resulting prejudice. *Lindsay*, 180 Wn.2d at 430.

Therefore, the Defendant must show:

- the statement (“Your Honor, I believe there is”) was error
- which had a substantial likelihood of affecting the jury’s verdict
- and which was so flagrant and ill-intentioned that an instruction could not have cured the resulting prejudice.

In this case, before we address whether there was error, we must agree on what was said. The State rejects the Defendant’s premise that the prosecutor argued the witness had a legal duty to come forward. This is simply not the record.

The transcript reads:

MS. CONTRIS: Your Honor, again, I would object to this line of questioning. It’s not the witness’ duties to be investigating a case.  
MR. JONES: Your Honor, I believe there is.  
THE COURT: Overruling the objection.  
MR. JONES: Thank you, sir.

RP 357. However, the Defendant would add the following language:

MR. JONES: [*But*] Your Honor, I believe there is [*a legal duty to report*].

This is neither the record, nor a likely interpretation. If the prosecutor intended to reject the defense’s position on legal duties, as the Defendant argues on appeal, he would have mirrored the defense’s sentence structure

with “I believe *it is* the witness’ duty to investigate.” But the prosecutor did not say this at the time, and he did not argue in closing that the witness had duties of any kind. Nor does it make sense that the prosecutor would respond to a claim that there was no duty to *investigate* by arguing that there was a different duty, a duty to *report*. This is simply not responsive to the objection.

Rather than inserting words into the transcript or putting arguments into the prosecutor’s mouth, it is more reasonable to interpret that the transcript is better rendered with a very slight change in punctuation, i.e.:

MR. JONES:           Your Honor, I believe there is [-]

This makes grammatical and logical sense, both in isolation for this page of the transcript and in the context of the prosecutor’s theory of the case as presented in closing argument. The court interrupted the prosecutor in order to rule on the objection before the parties got too far down the road of making speaking objections in the presence of the jury – for which the prosecutor thanked the judge and moved on.

Finally, even if the record were different than it in fact is, even if the prosecutor had said there was a duty to report, the claim fails. It fails because the jury was instructed to disregard the lawyers’ remarks which are not supported by the evidence or the law in the judge’s instructions. CP 43.

A jury is presumed to follow the court's instructions. *State v. Lord*, 117 Wn.2d 829, 861, 822 P.2d 177 (1991).

It fails because nowhere is there any record to suggest that the prosecutor believed that there was a legal duty. The prosecutor did not request a jury instruction about the witness' legal duties. When the prosecutor asked that the witness receive legal advice before testifying, it was in regards to making a false statement to a police officer (RCW 9A.76.175), not for failing to bring the alibi to police sooner. RP 342.

And it fails, because the prosecutor did not argue that Ms. Nolasco had done something illegal or had any *legal* duty to come forward. The prosecutor only argued that Ms. Nolasco was not credible. This is a proper argument from the evidence.

If Ms. Nolasco could provide a true alibi. why had she been absent from the case for the nine months leading up to trial? The Defendant, after all, was her close friend and soon to be a member of her family. Ms. Nolasco would feel a familial duty to come forward on behalf of her future brother-in-law if she believed him to be falsely accused. RP 387 ("If you knew you had a family member that is facing charges that you know for a fact are not true, you would want to contact someone."). Ms. Nolasco's failure to provide this alibi right away coupled with her repeated denials to police that she was the Defendant's alibi suggest that the alibi is a fabrication.

The record does not support the Defendant's premise that the prosecutor stated the witness had a legal duty to report to law enforcement. Accordingly, the Defendant cannot establish that the prosecutor made any improper comment.

**B. The constitutional guarantee of effective assistance of counsel does not require a defense attorney to impute an argument to the prosecutor which the prosecutor had not made.**

The Defendant reframes the prosecutorial error argument as ineffective assistance of counsel, arguing this his attorney should have objected "to the prosecutor's misstatement of the law." BOA at 18.

A defendant claiming ineffective assistance of counsel must show deficient performance and prejudice. *State v. Grier*, 171 Wn.2d 17, 33, 246 P.3d 1260, 1268 (2011). Prejudice means that counsel's errors were so serious as to deprive the defendant of a fair trial and that there is a reasonable probability that, but for those errors, the result of the proceeding would have been different. *Grier*, 171 Wn.2d at 33-34.

The court indulges in a strong presumption that counsel's performance is within the broad range of reasonable professional assistance. *Grier*, 171 Wn.2d at 33. If counsel's conduct can be characterized as legitimate trial strategy, performance is not deficient. *Id.* The decision of when, whether, and how to object, and what to argue are classic examples of tactical decisions. *State v. Madison*, 53 Wn. App. 754, 763, 770 P.2d 662

(1989). Only in egregious circumstances will the failure to object constitute ineffective representation. *Id.* Ineffective assistance of counsel claims based on objections require the defendant to prove: (1) an absence of legitimate strategic or tactical reasons supporting the challenged conduct; (2) that the objection would have likely been sustained; and (3) that the result of the trial would have been different if the objection was successful. *State v. Saunders*, 91 Wn. App. 575, 578, 958 P.2d 364 (1998). An appellate court is unlikely to find ineffective assistance on the basis of one alleged mistake. *See State v. Carpenter*, 52 Wn. App. 680, 684-85, 763 P.2d 455 (1988).

As explained above, the prosecutor made no statement of the law, incorrect or otherwise. The prosecutor was interrupted in responding to the Defendant's objection. It was the Defendant who characterized the prosecutor's line of questioning as suggesting the witness had a duty to investigate. The prosecutor did not endorse this – not at that time and not at any other point in the trial. Where there is no prosecutorial error, the failure to object is neither improper nor prejudicial. *Thorgerson*, 172 Wn. App. at 455.

The prosecutor also never endorsed a legal duty to report. Nor was defense counsel confused about the prosecutor's point. RP 403-04 (prosecutor's "presentation is, like, okay she has this motive make this up,

because she's engaged to his brother, protecting family"). Because the prosecutor did not make this argument, counsel's decision not to suggest otherwise was tactical. Whether through court instruction, prosecutor argument, or defense objection, no suggestion was ever before the jury that there was legal duty to report. If defense counsel objected on this basis, that would have been the only incidence suggesting such a duty. The objection itself could have been needlessly confusing and suggestive to the jury.

The Defendant cannot establish that any objection would have been sustained. The court had already rejected the Defendant's argument that the prosecutor's line of questioning implied a legal duty to investigate. It is not likely that the court would have sustained an objection that the prosecutor had implied a legal duty to report. The prosecutor only addressed this evidence to his argument on credibility.

Even if the court sustained the objection, the Defendant cannot show a sustained objection would have changed the outcome of his trial. The prosecutor did not pursue a theory of legal duty to report. The State's closing argument would have remained the same, and ultimately so would have the jury's conclusion regarding Ms. Nolasco's credibility.

The Defendant received effective assistance of counsel.

**C. The CrR 3.5 Findings and Conclusions have been filed.**

The Defendant complains that findings and conclusions were not entered after the CrR 3.5 hearing. Brief of Appellant (BOA) at 20. The Defendant raised this concern by an email to the trial attorneys and trial judge on July 22, before filing his brief on July 30. Less than a month later, on August 27, the findings were filed. The State has provided an electronic copy to appellate counsel and designated the document for transmission to this Court. CP 89-92.

As the Honorable Judge Korsmo has recently written, “The purpose of findings of fact is to facilitate review.” *State v. Yallup*, 3 Wn. App. 2d 546, 556, 416 P.3d 1250, 1255 (Wash. Ct. App. 2018), *review denied*, 191 Wn.2d 1014, 426 P.3d 742 (2018). Therefore, a best practice of appellate counsel is to facilitate the creation of findings prior to briefing. *Yallup*, 3 Wn. App. 2d at 555-57. Although the “ultimate responsibility” for entering findings “rests with a trial judge, the reality is that the prevailing party has the most at risk.” *Id.* at 556. Therefore, the State is motivated to enter those findings and responsive to reminders. The clerk of the court and the commissioner’s office also can assist a party in obtaining the findings prior to briefing. *Id.*

The Defendant indicated that the delay may prejudice him “if there is an indication that the findings have been ‘tailored’ to meet issues raised

on appeal.” BOA at 22-23. Prejudice is impossible in this case. The Brief of Appellant raised no issue regarding the CrR 3.5 order. Therefore, there was no issue to tailor the findings to.

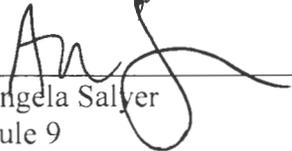
Since the findings were entered, the State informed appellate counsel that it would be agreeable to a motion to file an amended Brief of Appellant to address concerns raised by the findings. Defendant has not asked leave to file such a brief. *See State v. Quincy*, 122 Wn. App. 395, 95 P.3d 353 (2004) (no basis for reversal where defendant cannot establish prejudice by delay or tailored findings). The delay in the entry of findings is moot at this point.

#### V. CONCLUSION

For the above stated reasons, the State asks this Court to affirm the Defendant’s convictions and sentence.

RESPECTFULLY SUBMITTED this 19th day of September, 2019.

MARY E. ROBNETT  
Pierce County Prosecuting Attorney

  
\_\_\_\_\_  
Angela Salyer  
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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.

9-23-19 [Signature]  
Date Signature

**PIERCE COUNTY PROSECUTING ATTORNEY**

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