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Division II
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NO. 53132-1-II

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION TWO

STATE OF WASHINGTON,

Respondent,

v.

HOWARD SANFORD,
Appellant.

ON APPEAL FROM THE SUPERIOR COURT OF THE
STATE OF WASHINGTON FOR THURSTON COUNTY

Thurston County Cause No. 18-1-01060-34

The Honorable Erik D. Price, Judge

BRIEF OF APPELLANT

Skylar T. Brett
Attorney for Appellant

LAW OFFICE OF SKYLAR BRETT, PLLC
PO BOX 18084
SEATTLE, WA 98118
(206) 494-0098
skylarbrettlawoffice@gmail.com

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ISSUES AND ASSIGNMENTS OF ERROR

1. Mr. Sanford's convictions for Counts I and II were entered in violation of the Sixth and Fourteenth Amendment prohibition on double jeopardy.
2. Mr. Sanford's convictions for Counts III and IV were entered in violation of the Sixth and Fourteenth Amendment prohibition on double jeopardy.
3. Mr. Sanford's convictions for Counts I and II were entered in violation of the Wash. Const. art. I, § 9 prohibition on double jeopardy.
4. Mr. Sanford's convictions for Counts III and IV were entered in violation of the art. I, § 9 prohibition on double jeopardy.
5. Mr. Sanford's convictions for Counts I and II were based on the "same evidence" under the double jeopardy analysis.
6. Mr. Sanford's convictions for Counts III and IV were based on the "same evidence" under the double jeopardy analysis.
7. The trial court erred by failing to give a "separate and distinct acts" instruction in Mr. Sanford's case.
8. This Court's prior decision in *Wilkins, State v. Wilkins*, 200 Wn. App. 794, 403 P.3d 890, 898 (2017), *review denied*, 190 Wn.2d 1004, 413 P.3d 10 (2018), does not apply to Mr. Sanford's case.
9. In the alternative, this Court should overrule *Wilkins* because it is incorrect and harmful.

ISSUE: Two charges constitute the same offense for double jeopardy purposes when the evidence necessary to support one charge was also sufficient to support the other. When these circumstances exist, the trial court must instruct the jury that each charge must be based on a "separate and distinct act" to prevent two convictions for the same offense, in violation of double jeopardy. Were Mr. Sanford's convictions in Counts I and II, as well as Counts III and IV, entered in violation of his constitutional right to be free from double jeopardy when they were based on exactly the same evidence and the court failed to give a "separate and distinct acts" instruction?

STATEMENT OF FACTS AND PRIOR PROCEEDINGS

Fourteen-year-old O.S. claimed that her father, Howard Sanford, had engaged in oral sex with her. RP 61-69. She said the first incident happened she was nine years old. RP 61. She said that her mother had walked in on that incident and reacted strongly to it. RP 62.

But O.S.'s mother said that had never happened. RP 225. She said that she would definitely remember if something like that had occurred because it would have been very disturbing and she would have taken steps to protect her daughter. RP 226.

O.S. first claimed that the abuse had started when she was three years old. RP 68. But she later changed her story, claiming that it had begun when she was nine. RP 68.

Even so, the state charged Mr. Sanford with rape of a child in the first degree, child molestation in the first degree, rape of a child in the second degree, child molestation in the second degree, incest, and one count of fourth-degree assault. CP 19-20.

At Mr. Sanford's trial, O.S. described, generally, that Mr. Sanford had engaged her in oral sex numerous times. RP 61-69. She said it happened one to two times in the house she lived in until she was eleven.

RP 63. Then they moved, and she said that it happened more times at the new home. RP 64-69.

During closing argument, the prosecutor did not elect to rely on a specific alleged incident in support of each offense. *See* RP 308-23, 337-40. Instead, in support of each of the rape and molestation charges, the prosecutor pointed the jury toward the general evidence that Mr. Sanford had engaged in oral sex with O.S. both before and after she turned twelve. *See* RP 319-23.

The trial court did not give a “separate and distinct acts” instruction. *See* CP 36-70. No instruction informed the jury that each offense had to be based on proof of an incident that had not already been relied upon in support of a different charge. CP 36-70.

The jury convicted Mr. Sanford of each of the charges against him. CP 71-82.

Mr. Sanford had never been convicted of a felony before. CP 83. But he was sentenced with an offender score of twelve because each of the concurrent offenses was used to add three points to his score. CP 83-93, 96.

This timely appeal follows. CP 111-27.

ARGUMENT

THE TRIAL COURT VIOLATED THE CONSTITUTIONAL PROHIBITION ON DOUBLE JEOPARDY BY FAILING TO INSTRUCT THE JURY AT MR. SANFORD'S TRIAL THAT EACH OFFENSE HAD TO BE BASED ON A "SEPARATE AND DISTINCT ACT" FROM THE OTHERS.

The state charged Mr. Sanford with one count of rape of a child and one count of child molestation for the period when O.S. was younger than twelve years old; and another count of each offense for the period when she was between the ages of twelve and fourteen. CP 19-20.

The prosecutor did not choose during closing argument to "elect" a single alleged incident upon which to rely in support of each charge. *See* RP 308-23, 337-40. Instead – in support of each of the rape of a child and molestation charges -- the prosecutor pointed the jury toward the general evidence that Mr. Sanford engaged in oral sex with O.S. on multiple occasions during both of the charging periods. *See* RP 319-23.

This factual scenario required the court to instruct the jury that each alleged offense had to be supported by proof of a "separate and distinct act" in order to preclude multiple convictions for the same offense in violation of Mr. Sanford's right to remain free from double jeopardy.

But the court failed to give that instruction in Mr. Sanford's case. CP 36-70.

- A. Convictions for the two offenses of rape of a child and child molestation based on a single alleged incident would have violated Mr. Sanford's constitutional right to be free from double jeopardy. Accordingly, the trial court violated Mr. Sanford's constitutional rights by failing to instruct the jury that each charge had to be based on a "separate and distinct act."

Both the Washington state and federal constitutions prohibit double jeopardy based on multiple convictions or punishments for a single offense. U.S. Const. Amends. VI, XIV; art. I, § 9; *In re Orange*, 152 Wn.2d 795, 815, 100 P.3d 291 (2004), *as amended on denial of reconsideration* (Jan. 20, 2005).¹

The *Blockburger*² or "same evidence" test controls the double jeopardy analysis unless there is a clear indication that the legislature intended otherwise. *State v. Womac*, 160 Wn.2d 643, 652, 160 P.3d (2007). Under the *Blockburger* test, multiple convictions based on a single act violate double jeopardy if the evidence necessary to support a conviction for one offense would also have been sufficient to support a conviction for the other. *Orange*, 152 Wn.2d at 816.

In order to constitute separate offenses, two crimes must each include an element not included in the other *and* must each require proof

¹ Double jeopardy violations are constitutional issues reviewed *de novo*. *Womac*, 160 Wn.2d at 649. Double jeopardy violations constitute manifest error affecting a constitutional right, which can be raised for the first time on appeal. *State v. Turner*, 102 Wn. App. 202, 206, 6 P.3d 1226 (2000); RAP 2.5(a)(3).

² *Blockburger v. United States*, 284 U.S. 299, 304, 52 S.Ct. 180, 76 L.Ed. 306 (1932).

of a fact that the other does not. *State v. Hughes*, 166 Wn.2d 675, 682, 212 P.3d 558 (2009). Conviction for two offenses violates the constitutional prohibition on double jeopardy if *either* of these criteria are not met. *Id.*; *Orange*, 152 Wn.2d at 818.

Accordingly, the legal elements of the offenses are not dispositive of the *Blockburger* analysis for double jeopardy. *Womac*, 160 Wn.2d at 652. In *Womac*, for example, the Supreme Court held that separate convictions for second degree murder, first degree assault, and homicide by abuse violated double jeopardy – despite the fact that two of the offenses included an element not included in the others – because they were all based on the same alleged acts. *Id.*

Likewise, the Supreme Court has held that attempted murder and assault constitute a single offense for double jeopardy purposes, despite differences in the legal elements, when the two convictions are both based on a single act of firing one shot at another person. *Orange*, 152 Wn.2d at 820. Similarly, convictions for both second degree rape and second degree rape of a child violate double jeopardy when both are based on a single act of penetration – even though each statute includes a legal element that is not included in the other. *Hughes*, 166 Wn.2d at 683; *See also State v. Martin*, 149 Wn. App. 689, 699, 205 P.3d 931 (2009) (finding that

convictions for assault and attempted rape violated double jeopardy despite different legal elements).

Mr. Sanford's child molestation and rape convictions – in Counts I and II, as well as in Counts III and IV – could have been based on the “same evidence” for double jeopardy purposes. Each of the two sets of offenses were based only on general testimony that Mr. Sanford and O.S. had engaged in oral sex during the two charging periods. *Orange*, 152 Wn.2d at 816. The evidence that was necessary to find Mr. Sanford guilty of rape of a child – e.g. proof of one alleged instance of oral sex – was also sufficient to convict him of child molestation. *See* RCW 9A.44.073; RCW 9A.44.076; RCW 9A.44.083; RCW 9A.44.086; *See also State v. BJS*, 72 Wn. App. 368, 371, 864 P.2d 432 (1994), *abrogated on other grounds by State v. Lorenz*, 152 Wn.2d 22, 93 P.3d 133 (2004) (evidence of oral sex can support the “sexual contact” element of a child molestation charge).

If the jury based any two of the charges against Mr. Sanford on the conclusion that the state had proved a single instance of oral sex beyond a reasonable doubt, then those two convictions were entered in violation of the protection against double jeopardy. *Orange*, 152 Wn.2d at 818; *Womac*, 160 Wn.2d at 652.

Under these circumstances, the trial court was required to protect the constitutional prohibition on double jeopardy by explicitly instructing the jury that each charge had to be based on proof of a “separate and distinct act.” *State v. Mutch*, 171 Wn.2d 646, 662, 254 P.3d 803 (2011).

This is because a double jeopardy violation occurs unless it is “‘*manifestly apparent* to the jury that the State [was] not seeking to impose multiple punishments for the same offense’ and that each count was based on a separate act.” *Mutch*, 171 Wn.2d at 664 (quoting *State v. Berg*, 147 Wn. App. 923, 931, 198 P.3d 529 (2008)) (emphasis in original). This standard is “among the strictest” on review. *Id.*

Where a verdict is ambiguous as to whether the jury improperly relied on the same conduct in returning guilty verdicts on two different charges, the reviewing court must resolve the ambiguity in the defendant’s favor. *State v. Kier*, 164 Wn.2d 798, 811-14, 194 P.3d 212 (2008).

Because the court failed to instruct the jury at Mr. Sanford’s trial that each charge had to be based on proof of a “separate and distinct act,” it is not “manifestly apparent,” in this case “that each count was based on a separate act.” *Mutch*, 171 Wn.2d at 664. Applying this standard – which is “among the strictest” – Mr. Sanford’s child molestation convictions must be vacated and his case must be remanded for resentencing on only the remaining counts. *Kier*, 164 Wn.2d at 814.

B. This Court's holding in *Wilkins* does not apply to Mr. Sanford's case. In the alternative, *Wilkins* should be overruled because it was incorrectly decided and is harmful.

Based on current precedent in this Division, the outcome of Mr. Sanford's case may have been different if he was alleged to have engaged in penetration, rather than in oral sex alone. *See Wilkins*, 200 Wn. App. 794 (holding that convictions for rape of a child and child molestation based on a single act of penetration did not violate double jeopardy because each offense includes an element not required by the other).

But *Wilkins* does not apply to Mr. Sanford's case because there was no allegation that he engaged in penetration with O.S.

In the alternative, if this court finds that *Wilkins* does apply, then that decision should be overruled because it is incorrectly applied the "same evidence" test – in direct contradiction to the Supreme Court's directive in *Orange* and *Womac* -- and is harmful.

1. The holding of *Wilkins* does not apply to Mr. Sanford's case because he is not alleged to have engaged in any act of penetration.

The double jeopardy analysis in cases involving charges of rape of a child and child molestation differs depending on the sexual acts alleged. *See e.g. State v. Land*, 172 Wn. App. 593, 600, 295 P.3d 782 (2013).

The *Land* court held that rape of a child and child molestation may not constitute a single offense in cases of penetration because any activity

up to the moment of penetration qualifies as “sexual contact” whereas the act of penetration, itself, gives rise to a second charge of rape of a child:

Where the only evidence of sexual intercourse supporting a count of child rape is evidence of penetration, rape is not the same offense as child molestation. And this is so even if the penetration and molestation allegedly occur during a single incident of sexual contact between the child and the older person. The touching of sexual parts for sexual gratification constitutes molestation up until the point of actual penetration; at that point, the act of penetration alone, regardless of motivation, supports a separately punishable conviction for child rape.

Land, 172 Wn. App. at 600.

In cases alleged only oral sex, however, a single act could qualify as *both* rape of a child and child molestation. In those cases, conviction for both offenses violates the prohibition on double jeopardy because they are the same in fact and in law:

But where the only evidence of sexual intercourse supporting a count of child rape is evidence of sexual contact involving one person's sex organs and the mouth or anus of the other person, that single act of sexual intercourse, if done for sexual gratification, is both the offense of molestation and the offense of rape. In such a case, the two offenses are not separately punishable. They are the same *in fact and in law* because all the elements of the rape as proved are included in molestation, and the evidence required to support the conviction for molestation also necessarily proves the rape.

Land, 172 Wn. App. at 600 (*citing Hughes*, 166 Wn.2d at 682-64; *Orange*, 152 Wn.2d at 820) (emphasis in original).

Accordingly, the *Land* court held, failure to give a “separate and distinct acts” instruction would have required reversal in that case had the prosecutor not elected to rely on a different allegation in support of each count in closing. *Id.*

This Court’s decision in *Wilkins* relied in part on *Land* to conclude that the two convictions in that case did not violate double jeopardy because Mr. Wilkins was alleged to have engaged in penetration with the alleged victim. *Wilkins*, 200 Wn. App. at 807.

In Mr. Sanford’s case, however, there is not allegation of penetration. *See RP generally*. Instead, the single act of oral sex constituted the offenses of both rape of a child and child molestation. *Land*, 172 Wn. App. at 600. Accordingly, the two offenses “are not separately punishable” under the double jeopardy clause because “all the elements of the rape as proved are included in molestation, and the evidence required to support the conviction for molestation also necessarily proves the rape.” *Id.*

Because there is no alleged penetration in Mr. Sanford’s case, this court’s holding in *Wilkins* does not apply to its facts. *Id.* Mr. Sanford’s child molestation convictions must be vacated. *Kier*, 164 Wn.2d at 814.

2. In the alternative, *Wilkins* should be overruled because it is incorrect and harmful.

The Supreme Court has clarified that proper application of the “same evidence” test necessarily looks to the specific facts of a case. *Orange*, 152 Wn.2d at 818. The Court noted a common misconception, possibly arising from courts referring to the analysis both as the “same elements” and “same evidence” test but emphasized that the proper focus is on whether each offense “*requires proof of a fact which the other does not.*” *Id.* (emphasis in original).

Accordingly, the *Orange* court admonished the Courts of Appeals to refrain from engaging in a double jeopardy analysis that “[does] nothing more than compare the statutory elements [of two offenses] at their most abstract level.” *Id.* at 817–18.

But that is exactly what happened in *Wilkins*. The *Wilkins* court did not engage in any analysis into the evidence in the case or whether the child molestation charge required “proof of a fact,” which was not required to convict for the rape charge. *Wilkins*, 200 Wn. App. 794. Instead, the court simply concluded that double jeopardy was not violated because child molestation required proof of sexual gratification while the rape of a child charge required proof of intercourse. *Id.* at 808.

In fact, both of those elements were proved in *Wilkins* using exactly the same evidence: evidence alleging a single act of penetration. *Id.*

The *Wilkins* court erred by simply comparing the statutory elements of the offenses “at their most abstract level,” against the Supreme Court’s directive in *Orange. Id.; Orange*, 152 Wn.2d at 817-18.

The *Wilkins* court also erroneously relied on precedent, which either had been impliedly overruled or did not apply to the facts of the case.

First, the *Wilkins* court relied on the Supreme Court’s decision in *French*, which held only that it did not violate double jeopardy to enter multiple convictions for rape of a child based on *multiple acts* of penetration occurring in the course of a single incident. *Wilkins*, 200 Wn. App. at 807 (citing *State v. French*, 157 Wn.2d 593, 612, 141 P.3d 54 (2006)). The *French* court said nothing regarding whether a *single act* could constitutionally support conviction for both rape of a child and child molestation. *See French*, 157 Wn.2d 593. The *Wilkins* court erred by relying on *French* for that proposition.

The *Wilkins* court also relied on Division I’s 1993 decision in *Jones. Wilkins*, 200 Wn. App. at 808 (citing *State v. Jones*, 71 Wn. App. 798, 824-25, 863 P.2d 85 (1993)). But *Jones* was decided more than a decade before the Supreme Court clarified that any difference in the legal elements of two offenses is not dispositive to the double jeopardy analysis when the evidence necessary to prove one offense is sufficient to prove the

other. *Orange*, 152 Wn.2d at 816; *Womac*, 160 Wn.2d at 652. *Jones* was implicitly overruled by *Orange* and *Womac*.

Finally, the *Wilkins* court relied heavily on application of what it called the “*Calle* presumption.” *Wilkins*, 200 Wn. App. at 810. According to *Wilkins*, different statutory elements create a presumption that the legislature intended to punish two offenses separately. *Id.* (citing *State v. Calle*, 125 Wn.2d 769, 888 P.2d 155 (1995)). The *Wilkins* court held that the defense in that case had failed to overcome the “*Calle* presumption,” even while declining to specify the type of showing that could, conceivably, do so. *Id.*

But the *Calle* court did not conduct any inquiry into the facts or evidence of the specific case, instead focusing exclusively on legislative history and intent. *Calle*, 125 Wn.2d 769. Insofar as this analysis contradicts that undertaken in *Womac* and *Orange*, *Calle* has also been impliedly overruled. Indeed, the Supreme Court did not mention any “*Calle* presumption” in either *Womac* or *Orange*, choosing instead to direct lower courts to look, specifically, to the evidence relied upon in support of each charge. *Orange*, 152 Wn.2d at 816; *Womac*, 160 Wn.2d at 655.

In fact, the Supreme Court has never used the phrase “*Calle* presumption,” much less applied such a rule.

Instead, the *Womac* court clarified that the application of a fact-specific “same evidence” test is the correct mechanism for determining legislative intent. *Womac*, 160 Wn.2d at 655. If that test indicates that two charges were based on the same evidence – as in Mr. Sanford’s case – it creates a presumption that they are the same offense for double jeopardy purposes. *Id.* That presumption can be overcome only by clear legislative intent to the contrary. *Id.*

The *Wilkins* court erred by relying on an improper “*Calle* presumption,” rather than on the Supreme Court’s more recent decisions in *Womac* and *Orange*. *Wilkins* was wrongly decided. It is also harmful because it permits convictions in violation of the constitutional prohibition on double jeopardy. This court should overrule *Wilkins*. *Kier*, 164 Wn.2d at 804 (precedent will be overruled if it is both incorrect and harmful).

The trial court violated Mr. Sanford’s constitutional right to be free from double jeopardy by failing to inform the jury that Counts I and II, as well as Counts III and IV, had to be based on evidence of “separate and distinct acts.” *Mutch*, 171 Wn.2d at 664. Mr. Sanford’s convictions in Counts II and IV must be vacated and his case must be remanded for resentencing on only the remaining charges. *Kier*, 164 Wn.2d at 814.

CONCLUSION

Mr. Sanford's convictions for Counts I and II, as well as for Counts III and IV, were entered in violation of the constitutional prohibition on double jeopardy. Mr. Sanford's convictions for Counts II and IV must be vacated and his case must be remanded for resentencing on only the remaining charges.

Respectfully submitted on September 26, 2019,



Skylar T. Brett, WSBA No. 45475
Attorney for Appellant

CERTIFICATE OF SERVICE

I certify that on today's date:

I mailed a copy of Appellant's Opening Brief, postage prepaid, to:

Howard Sanford/DOC#413628
Washington Corrections Center
PO Box 900
Shelton, WA 98584

With the permission of the recipient(s), I delivered an electronic version of the brief, using the Court's filing portal, to:

Thurston County Prosecuting Attorney
paoappeals@co.thurston.wa.us

I filed the Appellant's Opening Brief electronically with the Court of Appeals, Division II, through the Court's online filing system.

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

Signed at Seattle, Washington on September 26, 2019.



Skylar T. Brett, WSBA No. 45475
Attorney for Appellant

LAW OFFICE OF SKYLAR BRETT

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