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COA NO. 53165-8-II

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

STATE OF WASHINGTON,

Respondent,

v.

CESAR CHICAS CARBALLO,

Appellant.

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

The Honorable Jerry Costello, Judge

REPLY BRIEF OF APPELLANT

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A. ARGUMENT IN REPLY

1. ADMISSION OF THE NONTESTIFYING CODEFENDANT'S OUT-OF-COURT STATEMENT, WHICH INCRIMINATED CHICAS CARBALLO, VIOLATED THE SIXTH AMENDMENT RIGHT TO CONFRONTATION.

Jurors are expected to bring common sense to their deliberations. State v. Briggs, 55 Wn. App. 44, 58, 776 P.2d 1347 (1989). And they are presumed to be intelligent. State v. Lord, 161 Wn.2d 276, 278-79, 165 P.3d 1251 (2007). Using their common sense and intelligence, it would be obvious to jurors that Ayala Reyes's incriminating statements implicated Chicas Carballo, the only codefendant on trial, in the murder. Chicas Carballo stands by his argument that admission of Ayala Reyes's out-of-court statement to police violated Chicas Carballo's Sixth Amendment right to confront the witnesses against him, requiring reversal.

2. THE COURT VIOLATED CHICAS CARBALLO'S RIGHT TO PRESENT A DEFENSE AND CROSS EXAMINE THE WITNESSES AGAINST HIM WHEN IT PREVENTED HIM FROM IMPEACHING THE STATE'S PRIMARY WITNESS WITH EVIDENCE OF BIAS.

a. The right to present a defense and to confront witnesses required that Chicas Carballo be allowed to cross-examine the State's witness about the deportation threat because the threat was relevant to show bias.

The State contends evidence that police threatened Flores, the State's key witness, with deportation was properly excluded because it was

irrelevant or lacked sufficient probative value. Brief of Respondent (BR) at 16-17. The State arrives at this mistaken conclusion by failing to respect the province of the jury to assess witness credibility and decide disputed questions of fact.

The trial court decides preliminary questions of fact, including the admissibility of evidence, under ER 104(a). State v. Karpenski, 94 Wn. App. 80, 102, 971 P.2d 553 (1999), abrogated on other grounds by State v. C.J., 148 Wn.2d 672, 63 P.3d 765 (2003). The proper inquiry is "whether the evidence is sufficient to support a finding of the needed fact." Id. Under the sufficiency test, the trial court "must take the information in the light most favorable to the proponent, accepting that . . . which favors the proponent." Condon Bros., Inc. v. Simpson Timber Co., 92 Wn. App. 275, 286, 966 P.2d 355 (1998).

Taking the evidence of in the light most favorable to Chicas Carballo, the deportation threat provided a motive for Flores to falsify or embellish her account regarding Chicas Carballo's involvement. The State claims Flores was not influenced by the threat because she did not inculcate Chicas Carballo or others in the murder until later in the interrogation. BR at 23-25. In making that argument, however, the State takes the evidence in the light most favorable to the State, not the defendant, which is contrary to law.

Meanwhile, "[i]t is the function and province of the jury to weigh the evidence, to determine the credibility of the witnesses, and to decide the disputed questions of fact." State v. Snider, 70 Wn.2d 326, 327, 422 P.2d 816 (1967). Thus, "where there are justifiable inferences from the evidence upon which reasonable minds might reach different conclusions, the questions are for the jury and not for the court to decide." Holland v. Columbia Irr. Dist., 75 Wn.2d 302, 304, 450 P.2d 488 (1969); see also State v. Ortuno-Perez, 196 Wn. App. 771, 798, 385 P.3d 218 (2016) ("The court cannot compel counsel to . . . draw only those inferences from the given facts which the court believes to be logical.").

In arguing the trial court properly excluded evidence of Flores's bias, the State claims Flores was not influenced by the threat because she did not immediately change her claim that she did not know anything upon hearing it. BR at 23-25. That is one inference to be drawn. It is hardly the only one. Another inference is that Flores, having time to mull over the implications of that threat, decided later in the interrogation to tell police what she thought they wanted to hear. This is a justifiable inference from the evidence. The jury, as finder of fact, is entitled to assess evidence of bias, which bears on the accuracy and truth of a witness's testimony. United States v. Abel, 469 U.S. 45, 52, 105 S. Ct. 465, 83 L. Ed. 2d 450 (1984). Whether Flores really harbored that motivation was

for the trier of fact to decide, not the trial court. See State v. Buss, 76 Wn. App. 780, 788, 887 P.2d 920 (1995) ("The issues of credibility and the weight to be given to evidence of [the witness's] bias was for the jury to decide, not the court."), abrogated on other grounds by State v. Martin, 137 Wn.2d 774, 975 P.2d 1020 (1999).

The State says the excluded evidence was irrelevant, but the contention is based on the mistaken premise that the deportation threat could not legitimately be used to attack Flores's credibility. BR at 24-25. Regardless, the trial court did not exclude the evidence on the basis of irrelevancy. 2RP 1476-78, 2334-35. "The partiality of a witness is subject to exploration at trial, and is always relevant as discrediting the witness and affecting the weight of his testimony." Davis v. Alaska, 415 U.S. 308, 316, 94 S. Ct. 1105, 39 L. Ed. 2d 347 (1974).

The State's argument that the evidence was properly excluded as lacking sufficient probative value under ER 403 is flawed. BR at 24-25. "Demonstrating bias on the part of the key witness has long been deemed an important element of a defendant's right to present a defense." State v. Bedada, __ Wn. App. 2d __, __ P.3d __, 2020 WL 2315785, at *9 (slip op. filed May 11, 2020) (citing State v. Fisher, 165 Wn.2d 727, 752, 202 P.3d 937 (2009)). As a result, "the ER 403 balancing of probative value versus unfair prejudice is weighed differently when the defense seeks to admit

evidence that is central to its defense." State v. Duarte Vela, 200 Wn. App. 306, 320, 402 P.3d 281 (2017), review denied, 190 Wn.2d 1005, 413 P.3d 11 (2018). If evidence sought to be used by the defense is relevant, the burden is on the State to show the evidence is so prejudicial or inflammatory that its admission would disrupt the fairness of the fact-finding process at trial. State v. Hudlow, 99 Wn.2d 1, 15-16, 659 P.2d 514 (1983).

Neither the State nor the court identified any prejudicial effect—specific to this case—that might result from the introduction of evidence of Flores's immigration status. Given the constitutional rights at stake, it is not enough to identify "a generalized concern of immigration as a sensitive political issue." Bedada, 2020 WL 2315785, at *7. While "generalized prejudice may be present in every case in which evidence of immigration status is admitted," such generalized prejudice does not necessarily result in an unfair trial. Id.

The State must also demonstrate a compelling state interest to exclude a defendant's relevant evidence. State v. Darden, 145 Wn.2d 612, 621, 41 P.3d 1189 (2002). The State has not identified a compelling interest in keeping the jury from hearing about Flores's motive to lie. The trial court never identified such an interest. On the other hand, a specific bias or motive to lie is highly probative. State v. Lee, 188 Wn.2d 473, 488,

396 P.3d 316 (2017). The impeachment evidence was relevant to the defense theory of the case that Flores lied. Evidence of her specific bias in the form of fear of deportation was of high probative value in relation to her credibility.

Further, in deciding admissibility, the availability of a limiting instruction must be taken into account. In analyzing the trial court's ruling in relation to ER 413, "we must pay heed to the entirety of the rule, including the calculation that — given the usefulness of limiting instructions — the introduction of evidence of immigration status does not result in an unfair trial when the evidence is presented for sufficiently weighty reasons." Bedada, 2020 WL 2315785, at *6. The trial court, in deciding whether to exclude evidence of immigration status as unduly prejudicial, must consider the availability of a limiting instruction, which is capable of ameliorating "the prejudicial effect of generalized concerns regarding immigration status." Id. at *8. The trial court here did not consider a limiting instruction in excluding the evidence as too prejudicial. This is an analytical error.

Speculation as to possible juror bias does not overcome the right to of a defendant to conduct reasonable cross-examination on a subject relevant to the witness's motive to lie. Olden v. Kentucky, 488 U.S. 227, 232, 109 S. Ct. 480, 102 L. Ed. 2d 513 (1988). The defendant must be

allowed to conduct reasonable cross-examination on a subject relevant to the witness's motive to lie, even if the subject matter is potentially inflammatory to the jury. Id. In Olden, for example, the trial court committed constitutional error in prohibiting the defense from cross-examining the complaining witness regarding her interracial relationship with her boyfriend to show she lied about being raped to avoid jeopardizing that relationship. Id. at 229-32. Speculation as to the effect of jurors' racial biases did not justify exclusion of cross-examination on the sensitive issue. Id. at 232.

Cases such as Olden teach the notion of "inflammatory" evidence cannot be relied on as a talisman to exclude relevant defense evidence. If the evidence is an important part of the defense case, the rights of the accused must be honored. Cross-examination is designed to expose a witness's motivation in testifying and thereby "expose to the jury the facts from which jurors . . . could appropriately draw inferences relating to the reliability of the witness." Id. at 231 (quoting Davis, 415 U.S. at 316-17).

The State cites Salas v. Hi-Tech Erectors, 168 Wn.2d 664, 230 P.3d 583 (2010). BR at 24-25. Salas is easily distinguishable. In that case, the plaintiff Salas was injured when he slipped from a ladder erected by Hi-Tech while working at a construction site. He sued Hi-Tech alleging negligence. At trial, evidence was admitted that Salas was an

undocumented immigrant. Salas, 168 Wn.2d at 666. The trial court reasoned Salas's immigration status was relevant to a determination of lost future wages because it called into question whether Salas's labor would be valued in United States dollars or some other currency should he be deported. Id. at 669. The Supreme Court noted the risk of Salas being deported was exceptionally low, but acknowledged his immigrant status was "minimally relevant" to the issue of lost future earnings. Id. at 669-70.

The Court recognized immigration is a politically sensitive issue, and that "[i]ssues involving immigration can inspire passionate responses that carry a significant danger of interfering with the fact finder's duty to engage in reasoned deliberation." Id. at 672. This is the crux of the Supreme Court's holding: "*In light of the low probative value of immigration status with regard to lost future earnings, the risk of unfair prejudice brought about by the admission of a plaintiff's immigration status is too great. Consequently, we are convinced that the probative value of a plaintiff's undocumented status, by itself, is substantially outweighed by the danger of unfair prejudice.*" Id. (emphasis added).

Salas is a civil case. As such, it is immediately distinguishable from Chicas Carballo's case. The Sixth Amendment right to confrontation applies exclusively to criminal prosecutions. State v. Abd-Rahmaan, 154 Wn.2d 280, 288, 111 P.3d 1157 (2005). There is no such right in civil

cases. In re Detention of Stout, 159 Wn.2d 357, 369, 150 P.3d 86 (2007). The constitutional mandate of confrontation through cross-examination played no role in Salas. Nor was the Sixth Amendment right to present a defense implicated in Salas. See Allied Fin. Servs., Inc. v. Mangum, 72 Wn. App. 164, 168 n.2, 864 P.2d 1, 871 P.2d 1075 (1993) ("The Sixth Amendment expressly applies to criminal cases, and we reject the argument advanced by counsel at oral argument that the 'penumbra' of the Sixth Amendment extends to civil cases."). Chicas Carballo's case is not a civil case involving lost future wages. His freedom is on the line. His liberty interest triggers constitutional scrutiny of a decision to withhold evidence relevant to his defense.

Further, unlike in Salas, the excluded evidence in Chicas Carballo's case is more than minimally relevant. Evidence of Flores's specific bias, in the form of being motivated to accuse Chicas Carballo of being involved in the murder due to fear of her own deportation if she did not cooperate with authorities, was highly relevant to her credibility. Again, evidence of a witness's specific bias is highly probative of credibility. Lee, 188 Wn.2d at 488. And "in a criminal case, to allow the defendant no cross-examination into an important area is an abuse of discretion." State v. York, 28 Wn. App. 33, 36, 621 P.2d 784 (1980). As argued, the deportation threat was an important area for cross-examination to reveal

witness bias. Further, "[i]t is well established that a criminal defendant is given extra latitude in cross-examination to show motive or credibility, especially when the particular prosecution witness is essential to the state's case." Id. There is no dispute Flores was essential to the State's case. Where, as here, the witness sought to be cross-examined is the government's "star" witness "providing an essential link in the prosecution's case, the importance of full cross-examination to disclose possible bias is necessarily increased." Greene v. Wainwright, 634 F.2d 272, 275 (5th Cir. 1981) (quoting United States v. Summers, 598 F.2d 450, 460 (5th Cir. 1979)).

Citing State v. Avendano-Lopez, 79 Wn. App. 706, 718-19, 904 P.2d 324 (1995), review denied, 129 Wn.2d 1007, 917 P.2d 129 (1996), the State equates the constitutional right to show the bias of a government witness with an "appeal to nationality or other prejudices." BR at 24. This is unfair to defense counsel and mocks the Sixth Amendment right to cross-examination. Avendano-Lopez was a prosecutorial misconduct case. The prosecutor questioned the defendant about his immigration status in a manner that was "calculated and planned to incite the jury's passion and prejudice. The question was entirely unrelated to the subject matter of the preceding line of cross-examination and was completely irrelevant to the material issues of the case." Avendano-Lopez, 79 Wn. App. at 719-20.

The State perversely relies on the egregious behavior of the prosecutor toward the accused in Avendano-Lopez to argue the accused in this case cannot present his defense.

Chicas Carballo's counsel did not seek to make a naked appeal to nationalist prejudice, as the prosecutor in Avendano-Lopez did. And no one claimed he did below. Counsel sought to use evidence of bias in service of the legitimate defense theory that Flores had a motive to lie after being threatened by police. Evidence of a motive to fabricate on the part of Flores — whose testimony was the principal evidence supporting every charge against Chicas Carballo — could affect a fact finder's assessment as to whether the facts alleged by Flores were true.

b. By its own terms, the evidentiary rule gives way to the constitutional right.

This Court should reject the State's contention that the trial court properly excluded the evidence because Chicas Carballo did not bring a written pre-trial motion under ER 413. BR at 19-20. As the State acknowledges, ER 413(a)(5) dictates that "[n]othing in this section shall be construed to exclude evidence that would result in the violation of a defendant's constitutional rights." This provision embodies the general principle that court rules cannot diminish constitutional rights. City of Auburn v. Brooke, 119 Wn.2d 623, 632-33, 836 P.2d 212 (1992). It

makes no sense to say ER 413 barred Chicas Carballo from presenting evidence of witness bias because he did not comply with its timing requirement when the rule itself contemplates that it will not be applied when doing so would violate a defendant's constitutional rights. If, as argued by Chicas Carballo, the deportation threat against Flores should have been admitted to protect Chicas Carballo's right to present a defense and confront the witnesses against him, then the evidentiary rule, by its own terms, cannot be used as a basis to exclude the evidence. The trial court gave no heed to the constitutional interest at stake. The court thus erred in ruling the evidence was inadmissible because the procedural requirement of ER 413 was unsatisfied. 2RP 1476-78, 2334-35.

c. Reversal is required because this constitutional error is not harmless beyond a reasonable doubt

Contrary to the State's argument, this constitutional error is not harmless beyond a reasonable doubt. The charges hinge on the credibility of Flores's testimony. For confrontation errors, the reviewing court assesses whether the error is harmless beyond a reasonable doubt by "assuming the damaging potential of the cross-examination were fully realized." Delaware v. Van Arsdall, 475 U.S. 673, 684, 106 S. Ct. 1431, 89 L. Ed. 2d 674 (1986). Assuming "the damaging potential of the cross-examination" regarding the deportation threat was "fully realized," the

result is that Flores's credibility is compromised. The trial court's exclusion of evidence from which a jury could have inferred that Flores had a personal interest in testifying in a certain manner was harmful because the jury was not fully informed of matters relevant to an assessment of Flores's credibility, which was essential to the State's case. In State v. Romero-Ochoa, 193 Wn.2d 341, 363, 440 P.3d 994 (2019), the error in excluding evidence of immigration status related to the victim's interest in a U-Visa was harmless because the victim's account was corroborated by numerous witnesses. There is no such corroboration of Flores's account here. The State's case rose or fell on the believability of her testimony. That is why the error in excluding evidence of her motive to falsify her account cannot be deemed harmless beyond a reasonable doubt.

3. THE IMPOSITION OF DISCRETIONARY LEGAL FINANCIAL OBLIGATIONS IS A CLERICAL ERROR.

The State concedes the supervision cost and the cost of legal financial obligation (LFO) collection should be stricken. BR at 32. The concession is appropriate and is supported by the recent decision in State v. Dillon, 12 Wn. App. 2d 133, 152, 456 P.3d 1199 (2020).

In that case, the Court of Appeals struck the supervision fee because the record demonstrated that the trial court intended to impose

only mandatory LFOs. The trial court indicated at sentencing that it would impose mandatory LFOs. The court did not mention supervision fees and the LFO section of the judgment and sentence did not include any reference to the supervision fee. Under the section in the judgment and sentence on community custody conditions, the requirement to "pay supervision fees as determined by DOC" was buried in a lengthy paragraph on community custody. "From this record, it appears that the trial court intended to waive all discretionary LFOs, but inadvertently imposed supervision fees because of its location in the judgment and sentence." Id. The Court of Appeals therefore remanded to strike the supervision fee. Id. at 137, 152.

The record in Chicas Carballo's case is comparable. It is apparent that the court did not intend to impose the cost of supervision or collection costs because, in finding Chicas Carballo indigent and imposing the mandatory \$500 victim penalty and \$100 DNA fee, it stated, "I will not impose any other legal financial obligations, other than restitution that can be set by later court order." 2RP 2350. The requirement to pay supervision fees was buried in a boilerplate paragraph listing community custody conditions. CP 79. The collection cost condition was also pre-printed and included in a boilerplate section of the judgment and sentence. CP 77. These costs were not listed in the LFO section of the judgment and

sentence. CP 76. As in Dillon, the record shows the trial court did not intend to impose the discretionary supervision and collection fees. The remedy is remand to strike the unintended fees. Dillon, 12 Wn. App. 2d at 137, 152.

D. CONCLUSION

For the reasons stated above and in the opening brief, Chicas Carballo requests (1) reversal of the convictions; (2) remand for resentencing; (3) deletion of the supervision and collection costs; and (4) modification of the interest provision, and the striking of non-restitution interest.

DATED this 26th day of May 2020

Respectfully Submitted,

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