

FILED
Court of Appeals
Division II
State of Washington
7/22/2020 4:59 PM
NO. 53892-0-II

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

STATE OF WASHINGTON,
Respondent,

v.

RAMIL AGLES SERRANO,
Appellant.

APPEAL FROM THE SUPERIOR COURT OF THE STATE
OF WASHINGTON FOR GRAYS HARBOR COUNTY

THE HONORABLE DAVID L. MISTACHKIN, JUDGE

BRIEF OF RESPONDENT

KATHERINE L. SVOBODA
Prosecuting Attorney
for Grays Harbor County

BY: 

JENNIFER ZORN
Deputy Prosecuting Attorney
WSBA # 49318

OFFICE AND POST OFFICE ADDRESS
Grays Harbor County Prosecuting Attorney
102 West Broadway Room 102
Montesano, WA 98563
(360) 249-3951

T A B L E S

Table of Contents

RESPONSE TO ASSIGNMENTS OF ERROR 1

RESPONDENT’S COUNTER STATEMENT OF THE CASE..... 1

ARGUMENT 6

**1. The State presented sufficient evidence for the trial court to
 convict the Appellant on one count of Rape of a Child in the
 First Degree and on one count of Child Molestation in the First
 Degree..... 6**

Standard of Review..... 6

Sufficiency of the Evidence. 7

Credibility..... 11

Conclusion. 18

**2. The State concedes the interest on the fines in this case should
 be waived..... 19**

CONCLUSION 19

Table of Authorities

Cases

<i>State v. Alexander</i> , 64 Wash. App. 147, 822 P.2d 1250 (1992)	8, 9
<i>State v. Camarillo</i> , 115 Wash.2d 60, 794 P.2d 850 (1990).	7
<i>State v. Cardenas-Flores</i> , 189 Wash. 2d 243, 401 P.3d 19, 31 (2017) 7, 12	
<i>State v. Green</i> , 94 Wn.2d 216, 616 P.2d 628 (1980).	6
<i>State v. Harstad</i> , 153 Wn. App. 10, 21, 218 P.3d 624, 628–29 (2009)	16
<i>State v. Homan</i> , 181 Wn. 2d 102, 330 P.3d 182 (2014)	7
<i>State v. Jackson</i> , 129 Wn.App. 95, P.3d 1182 (2005).	7
<i>State v. Kintz</i> , 169 Wash.2d 537, P.3d 470 (2010)	7
<i>State v. Partin</i> , 88 Wn.2d 899, 567 P.2d 1136 (1977).....	6
<i>State v. Salinas</i> , 119 Wn. 2d 192, 829 P.2d 1068 (1992)	6
<i>State v. Scanlan</i> , 193 Wash. 2d 753, 445 P.3d 960, 968 (2019), cert. denied, 140 S. Ct. 834, 205 L. Ed. 2d 483 (2020)	7
<i>State v. Theroff</i> , 25 Wn.App. 590, 593, 608 P.2d 1254, <i>aff'd</i> , 95 Wn.2d 385, 622 P.2d 1240 (1980).....	6
<i>State v. Thomas</i> , 150 Wash.2d 821, 83 P.3d 970 (2004)	7
<i>State v. Vasquez</i> , 178 Wash.2d 1, P.3d 318 (2013)	7

Statutes

RCW 9A. 44. 010.....	13
RCW 9A.44.073.....	13

RESPONSE TO ASSIGNMENTS OF ERROR

1. **The State presented sufficient evidence for the trial court to convict the Appellant on one count of Rape of a Child in the First Degree and on one count of Child Molestation in the First Degree.**
2. **The trial court's order for the fines in this case to bear interest should be stricken.**

RESPONDENT'S COUNTER STATEMENT OF THE CASE

S.S was an eleven year old girl and in the fifth grade at the time of the trial. 1RP at 32, lines 9-12. S.S lives with her mother, Pong Jo Sem and her younger brother, L.S., in Aberdeen, Washington. 1RP at 90-92. Mrs. Sem was a night dealer at the Quinault Beach Resort Casino, which is where she met the Appellant, a co-worker. 1RP at 95-97. Between April and May of 2016, Mrs. Sem and the Appellant entered into a verbal agreement to become roommates. 1RP at 97.

Mrs. Sem's parents live on the same piece of property in a small house about fifty feet away from her house. 1RP at 92. While Mrs. Sem was at work, the kids would go to her parent's house. 1RP at 92. When the Appellant was home, it was not uncommon for him to watch the kids. 1RP at 102. The Appellant moved out between March and April of 2018, due

to Mrs. Sem's husband believing he could get a U.S. visa and come live with them from the Philippines. 1RP at 99-101.

Between September and October of 2018, Chhrick Sumalabe, Mrs. Sem's sister, was visiting their parents when she ended up speaking with S.S about good and bad touch. 1RP at 78,82,104. S.S disclosed what had happened to Ms. Sumalabe and Ms. Sumalabe told Ms. Sem what S.S. disclosed. 1RP at 103. Mrs. Sem was shocked by this information and took some time to process the information before reporting the incident to the police. 1RP at 103-104.

During the investigation, Mrs. Sem took S.S for a medical examination at Providence St. Peter Hospital Sexual Assault Clinic and Child Maltreatment Center. 1RP at 144, 154. Lisa Wahl is a family nurse practitioner and a sexual assault nurse examiner "SANE" at the Providence Clinic with twelve years' experience. 1RP at 144 & 147. Ms. Wahl testified that she performed the evaluation and exam on S.S in September of 2018. 1RP at 153-154.

Ms. Wahl testified that she spoke to S.S. in great length about her body covering everything from head to toe. 1RP at 154-155. When S.S began to speak about the reason she was there, S.S.'s demeanor changed,

she became very quiet, showed body language of shutting down, and was having a difficult time telling her what had happened. 1RP at 155.

When asked who they were talking about, S.S. wrote the name "Ramil" down. 1RP at 155. At this point, Ms. Wahl and S.S. went over the male and female bodies with anatomically correct drawings to confirm which body parts were involved. 1RP at 155. S.S. told Ms. Wahl that she was in her house when over ten (10) times the Appellant put his penis in her vagina, causing her pain when he tried to push it in. 1RP at 156.

During the physical genital exam, Ms. Wahl stated she found S.S. to be healthy/normal and explained in detail how that was normal. 1RP at 160. Ms. Wahl's explained that delayed disclosure is very common in children and on average disclosure usually happens six (6) months to a year after the fact. 1RP at 159. Due to the delayed disclosure, 95 to 97.2 percent of children disclosing after six (6) months, show no physical findings or were found to be healthy/normal during the physical genital exam. 1RP at 164. However, Ms. Wahl did testify that S.S. tested positive for herpes simplex virus one. 1RP at 160-161.

Detective Jeff Weiss with the Aberdeen Police Department was assigned this case after the initial report was taken. 1RP at 110-111, 114. Det. Weiss conducted two interviews with the Appellant which were tape

recorded. 1RP at 129. After about thirty (30) minutes, the first interview concluded and addressed foundational information. 1RP at 130.

During the second interview that happened the next day, the Appellant broke down and started crying. 1RP at 132. The Appellant admitting that he and S.S. like to wrestle upstairs on the bed. 1RP at 133. The Appellant explained that “S.S. wore silky bottom pajamas, which were really thin and tight, and when S.S. pulled his pants down she was on top of him and obviously his penis was up against her vagina”. 1RP at 134.

At trial, S.S testified that when her mother was at work, she and the Appellant, would watch TV on her mother’s bed. 1RP at 47. While watching TV the Appellant would tell S.S. to take off her clothes. 1RP at 48. The Appellant would then take off his clothes. 1RP at 48. S.S. stated that the Appellant would then put his privates on her privates, on her skin, and put his privates in her privates. 1RP at 50-56. S.S. was very quiet and shy while testifying, which caused some issues with how well the interpreters could hear her. 1RP at 32- 69. When asked what “privates” meant, S.S. would gesture to her pelvic vagina area. 1RP at 51. S.S explained that she would be laying down on the bed and the Appellant would be in front of her and she would be on her back. 1RP at 57, 75. S.S

described the feeling as “weird” when asked how she felt when the Appellant was putting his privates inside her privates. 1RP at 58. S.S. stated that this happened “a lot” with the Appellant. 1RP at 72.

At the end of the bench trial, the Court found that the Appellant was guilty of both Rape of a Child in the First Degree and Child Molestation in the First Degree. 2RP at 212. The Court laid out its finding of fact on the record. 2RP at 212.

The Appellant had access to the child alone on a number of occasions. 2RP at 212. That the Appellant placed his penis on S.S.’s bare skin without penetration and that it was clearly done for sexual gratification purposes. 2RP at 213. That S.S. was credible and there was sufficient evidence that the Appellant penetrated S.S multiple times. 2RP at 213, 216. That the Appellant made his statement to law enforcement of his own free will when the Appellant made his admissions. 2RP at 214-215. The Appellant was found not to be credible. 2RP at 215.

ARGUMENT

1. **The State presented sufficient evidence for the trial court to convict the Appellant on one count of Rape of a Child in the First Degree and on one count of Child Molestation in the First Degree.**

Standard of Review.

“The test for determining the sufficiency of the evidence is whether, after viewing the evidence in the light most favorable to the State, any rational trier of fact could have found guilt beyond a reasonable doubt.” *State v. Salinas*, 119 Wn.2d 192, 201, 829 P.2d 1068, 1074 (1992) (citing *State v. Green*, 94 Wn.2d 216, 220–22, 616 P.2d 628 (1980).) “When the sufficiency of the evidence is challenged in a criminal case, all reasonable inferences from the evidence must be drawn in favor of the State and interpreted most strongly against the defendant.” *Id.* (citing *State v. Partin*, 88 Wn.2d 899, 906–07, 567 P.2d 1136 (1977).) “A claim of insufficiency admits the truth of the State's evidence and all inferences that reasonably can be drawn therefrom.” *Id.* (citing *State v. Theroff*, 25 Wn. App. 590, 593, 608 P.2d 1254, *aff'd*, 95 Wn.2d 385, 622 P.2d 1240 (1980).) “Circumstantial evidence and direct evidence are

equally reliable' in determining the sufficiency of the evidence." *State v. Kintz*, 169 Wash.2d 537, 551, 238 P.3d 470 (2010) (quoting *State v. Thomas*, 150 Wash.2d 821, 874, 83 P.3d 970 (2004)). However, "inferences based on circumstantial evidence must be reasonable and cannot be based on speculation." (quoting *State v. Vasquez*, 178 Wash.2d 1, 16, 309 P.3d 318 (2013)). *State v. Scanlan*, 193 Wash.2d 753, 770–71, 445 P.3d 960, 968 (2019), cert. denied, 140 S. Ct. 834, 205 L. Ed. 2d 483 (2020)

Appellate courts "defer to the trier of fact for purposes of resolving conflicting testimony and evaluating the persuasiveness of the evidence." *State v. Homan*, 181 Wn.2d 102, 106, 330 P.3d 182, 185 (2014) (citing *State v. Jackson*, 129 Wn. App. 95, 109, 117 P.3d 1182 (2005).) "Credibility determinations are for the trier of fact" and are not subject to review. *State v. Cardenas-Flores*, 189 Wash.2d 243, 266, 401 P.3d 19, 31 (2017) (citing *State v. Camarillo*, 115 Wash.2d 60, 71, 794 P.2d 850 (1990).)

Sufficiency of the Evidence.

The State presented sufficient evidence at trial to support the Appellant's conviction for one count of Rape of a Child in the First Degree and one count of Child Molestation in the First Degree, and the

verdict of the trial court should be upheld. The Appellant relies heavily on the *Alexander* case to imply differences in testimony in this case rise to the level requiring reversal of the convictions. *State v. Alexander*, 64 Wn. App. 147, 822 P.2d 1250 (1992) Appellant Brief (“AB”) pages 6- 11. However, the *Alexander* case was overturned due to cumulative error, not because the court simply found the victim’s testimony had inconsistencies.

In *Alexander*, the Court found that the witnesses impermissible bolstering of the victim’s story and the prosecutor’s improper questioning and closing remarks prevented Alexander from getting a fair trial, as the evidence was too confusing to allow the jury to properly weigh the inconsistencies in the victim’s testimony. *Id.* at 158.

The *Alexander* Court explained why they felt that the level of inconsistencies in the victim’s testimony was viewed as extreme:

Initially, we observe that the victim need not “pinpoint the exact dates of the oft-repeated incidents of sexual contact.” *Ferguson*, 100 Wash.2d at 139, 667 P.2d 68. In this case, however, the inconsistencies in M's testimony regarding when the abuse occurred, and whether the bathtub or baby oil incidents occurred at all, were extreme. We cannot conclude that a rational jury would have returned the same verdict had Bennett's and S's bolstering testimony and the prosecutor's improper remarks been properly excluded. Accordingly, we hold that, without this inadmissible testimony, the evidence presented to this jury was too confused to allow it to find Alexander guilty on either count beyond a reasonable doubt.

State v. Alexander, 64 Wash. App. 147, 157–58, 822 P.2d 1250, 1256 (1992)

That is not what happened in this case, at no point during the trial did the victim state or imply that nothing happened. The Appellant picks and chooses portions of testimony in an attempt to show inconsistencies that are not there. The Appellant first points out that “Lisa Wahl testified that during the SANE evaluation that S.S. disclosed vaginal penetration by the Appellant, and that it had happened over ten times, that it caused her pain and that it felt “weird.” 1RP at 153. AB at 11. Then the Appellant tries to negate this statement of penetration by pointing to one section of Wahl’s testimony, “But Ms. Wahl said that a genital exam of S.S. showed “[n]ormal findings.” [Cites removed] S.S. was tested and was positive for herpes simplex virus 1 which Ms. Wahl said was a “nonspecific finding” and that it “does not state diagnostic of sexual abuse.” 1RP at 160-161. AB at 11.

The Appellant cites to testimony of Lisa Wahl’s physical exam to try to show an “extreme” inconsistency in S.S. testimony. The Appellant is comparing apples to oranges along with leaving out the main portion of Wahl’s testimony about the physical exam for any form of context. Lisa

Wahl addressed the implied inconsistency issue of “normal findings” in the State’s direct as child normally have delayed disclosure.

“Q: And if the genital exam portion is completed, in your experience how common is it not to find injuries, trauma, et cetera, on these children?” 1RP at 152, lines 23-25.

“A: My experience reflects the data, which is substantial, that the overwhelming – over 95 percent of genital exams on children, including children who have had penetrating trauma, vaginal trauma, have regular or normal findings. And this is true because the tissue heals and typically children do not disclose immediately. So if time has passed [sic] the mucosal tissue has healed, there’s no evidence of trauma, if there was trauma in the first place.”

1RP at 153, lines 1-9.

When addressing the positive results for the herpes simplex one virus, Lisa Wahl’s goes on to state:

“A: She was positive for herpes simplex virus one, which is not indicative and it is – it is a nonspecific finding. It does not state diagnostic of sexual abuse.

[An objection over phrasing of the question removed]

Q: Even though that’s not indicative of sexual abuse, can that type of virus be transmitted sexually?

[...]

A: It can.”

1RP at 161-162, lines 11-6.

When examining the passage quoted by the Appellant within the context of all of Lisa Wahl's testimony, it does not show an inconsistent statement from the victim. It is simply a fact, supported by data, that ninety- five (95) percent of sexual assault cases involving children have delayed disclosure so not finding trauma in the physical genital exam is normal. Lisa Wahl also clarified that the possibility that the victim may or may not have gotten the herpes simplex virus one from sexual abuse.

Credibility.

S.S.,'s testimony is further taken out of context when the Appellant raises the issue with the interpreters. AB at 11. The State is in agreement that the interpreters had a very hard time hearing and understanding S.S., but the interpreters did not just have an issue with S.S. The interpreters began the trial with not being able to hear the State. 1RP at 15-16, lines 25 -1. During opening statements by the State, the Appellant couldn't hearing what the interpreter was saying. 1RP at 25, lines 4 -7. A discussion then occurred about where the interpreter should sit, if they should use a device or take turns sitting next to the Appellant and whisper, along with asking clarifying questions during opening statements. 1RP at 25-29. This issue continues throughout the trial. The interpreter interrupted the court proceeding almost forty times throughout the trial

and happened to various speakers. 1RP at 15, 16, 25, 29, 33, 34, 40, 45, 50, 52, 56, 57, 59, 60, 61, 63, 64, 66, 67, 69, 81, 107, 116, 123. 2RP at 172, 177, 197, 183, 201, 202, 207.

The interpreter issue is raised to call into question the victim's testimony. The idea that S.S.'s testimony was inconsistent and unreliable because she needed to speak louder or more clearly is simply a way to address credibility. The trial court found that S.S testified credibly. 2RP at 212, lines 24-25. and 213, lines 15-16. The trial court further addressed the way S.S. testified stating;

The testimony by- again, by the victim was credible. And I want to say that I'm mindful that she did struggle to -to-to-testify. There's no doubt about that. We all saw the testimony. And I think that- there was no evidence really that the child - that the victim in this case had any motive or any reason to fabricate it. In fact, she had delayed disclosure. She was reluctant to speak to anybody, including the nurse practitioner, SANE examiner, was reluctant with her mom, with her aunt [,] in court. There's no - there's no doubt about that. But that doesn't make her allegations any less credible.

2RP at 213 -214.

Since the trial court has found that S.S. was credible, any additional issue with that determination is not subject to review as credibility determinations are for the trier of fact. *State v. Cardenas-Flores*, 189 Wash. 2d at 266.

The Revised Code of Washington (“RCW”) titled Rape of a Child in the First Degree, states that “(1) A person is guilty of rape of a child in the first degree when the person has sexual intercourse with another who is less than twelve years old [...]” RCW 9A.44.073. The definition of "Sexual intercourse" within the RCWs states it has “its ordinary meaning and occurs upon any penetration, however slight...” RCW 9A.44.010 S.S. testified to the issue of vaginal penetration at trial. S.S. stated that the incident happened at night while they were watching television in her mother’s bedroom when her mom was at work. 1RP at 47, lines 6 – 19. S.S. went on to testify that they would be watching television and the Appellant would tell her to take off her clothes and then he would take off his clothes. 1RP at 48, line 8-10. S.S. then stated that “he would like put his private **in** my private.” 1RP at 48, line 20. (Emphasis added).

S.S. goes on to clarify what she meant when she said he put his private in my private.

“A: He started to put his private on my private.

Q: Okay. And when you say private, what do you mean? What body part are you talking about?

A: Like....

Q: On yourself, so when you say your private, what part is that?

A: Right here.

Q: Okay. So I see that you're gesturing with your hands to your pelvic vagina area?

A: Yeah.

Q: Okay. And when you say that he put his private on your private what do you mean about this private? What area is that?

A: Like – Like in. [...]

Q: Like can you show me on yourself like where his private is, too?

(Indicating.)

Q: So you're again gesturing to that same area. Okay. And was- was that- did he actually touch your body with his private?

A: Yeah.”

IRP at 51-52, lines 5- 19 and lines 7-10.

S.S. additionally states:

A: He put it on my private.

Q: Okay. And to- when you say he put it on your private, what do you mean?

A: Like in.

Q: In. Okay. And was that on your clothes, under your clothes, something else?

A: On my skin. [...]

Q: And then what would happen when- when he would do that?

A: It like felt weird.

1RP at 55-56, lines 16-5.

Lisa Wahl also testified to the issue of penetration during the SANE exam.

“Q: And then how would you describe [S.S.] during your initial interaction with her, her demeanor, he behavior? If you could describe that for us.

A” While we were talking about her home life and her health history, she was able to tell me with great detail and elaboration various things that had happened to her body when we’re talking about her eyes, her ears, her nose, how she hurt her wrist and how thinks like talking about genital and general human development and what they had not or had learned in school. We discussed at length about estrogen and how that affects a female’s body. We talked about periods and menstruation and she talked about very openly and candidly about her life until – I asked her about what it was that Mike Clark had referred us for. At that point [S.S.] became very quiet, her gaze went down, her shoulders slumped in sort of indicators, body language of shutting down, and recognized that she was having a difficult time telling me what was- what happened. And so

when I asked her who- want-who are we talking about, she wrote the name Ramil, R-a-m-i-l.

And that at that point I used a male and female anatomically correct drawings of children drawings but with all correct body arts and we established her knowledge as far as penis, vagina, and breast, which she called boobs and bottom. And then in a head-to-toe fashion I then again asked about what had happened between this person Ramil and [S.S.]. And what was able to tell me was that she was in her house when he over ten times put his penis in her vagina, causing her pain when her tried to, what she said, push it in. And she- when I asked her initially how it felt, she said weird. [...]

IRP at 154-156.

In looking at the trial testimony as a whole, in the light most favorable to the State, it is clear what S.S. meant when she stated that “he put his private in my private and when asked what area she was speaking about when she said private she pointed to her pelvic vagina area. “A jury may determine that “parts of the body in close proximity to the primary erogenous areas” are intimate parts. *State v. Harstad*, 153 Wn. App. 10, 21, 218 P.3d 624, 628–29 (2009).

As to the charge of Child Molestation in the First Degree, the *Harstad* court defines what intimate contact is;

“Contact is ‘intimate’ within the meaning of the statute if the conduct is of such a nature that a person of common intelligence could fairly be expected to know that, under the circumstances, the parts touched were intimate and

therefore the touching was improper.” A jury may determine that “parts of the body in close proximity to the primary erogenous areas” are intimate parts. “Proof that an unrelated adult with no caretaking function has touched the intimate parts of a child supports the inference the touching was for the purpose of sexual gratification,” although we require additional proof of sexual purpose when clothes cover the intimate part touched.

State v. Harstad, 153 Wash. App. 10, 21, 218 P.3d 624, 628–29 (2009).

S.S. testified that the Appellant put his privates on my privates and when asked if that was on your clothes or under your clothes she clarified “on my skin.” 1RP at 55-56, lines 16-5. S.S. also testified that the Appellant told her to take off her clothes. 1RP at 48. In viewing the facts most favorable to the State, S.S. testimony clearly shows that there was intimate contact between the Appellant’s penis and S.S.’s vagina without clothing on.

Furthermore, there was testimony from Detective Weiss about the Appellant’s admissions. Detective Weiss recalled a breakdown reaction that the Appellant had prior to stating;

“A: So Lieutenant Darst at this point is doing 90 percent of the talking to him. And he finally tells us that they like to wrestle. They were upstairs on the bed, the girl, when they would wrestle, wasn’t uncommon that she would pull his pajama pants down **exposing himself**. And so were- we were – asked him, you know, is that- is that what she’s

reporting, because we're unclear with what exactly happened. And he finally said that she wore silky bottom pajamas, which are really thin and tight, and when he-when she pulled his pants down she was on top of him and obviously his penis was up against her vagina.”

1RP at 133-134, lines 20-6. (emphasis added).

The trial court addressed the Appellant’s testimony when providing the court’s verdict. The trial court stated;

“[...] I believe the interrogation was perfectly proper and I believe he made admissions – very damaging admissions about the contact between his penis and the vagina of the victim. And it’s interesting to me that his testimony on the stand was quite different than what he said to the police and then he denied even making those statements, which is – further supports my conclusion that his testimony denying all of the allegations is wholly unbelievable [sic]. It’s not credible.

1RP at 215, lines 5-14.

Additionally a reasonable jury would be able to find the plain meaning of the Appellant’s own word of “exposing himself.” 1RP at 133, lines 22-25. One does not “expose himself” if he has other items of clothing on, such as boxers. Exposing oneself implies full unobstructed view of one privates.

Conclusion.

The State has shown that the Appellant’s claims of insufficient evidence presented fail upon the proper standard of review and full

context of the facts. When viewing the evidence in the light most favorable to the State and all reasonable inferences from the evidence interpreted most strongly against the Appellant, the State has overcome the Appellant's allegations.

S.S. testified that multiple times the Appellant told her to undress as he did, that the Appellant put his penis in her vagina which caused her pain when he tried to push his penis inside of her vagina. Both S.S. and the Appellant speak to being in the mother's bedroom upstairs where the Appellant's exposed penis was on/up against S.S.'s vagina. Therefore, the Appellant's convictions for Rape of a Child in the First Degree and Child Molestation in the First Degree should be affirmed.

2. The State concedes the interest on the fines in this case should be waived. In reviewing the materials from the Appellant and applicable law, the State is in agreement that the interest on the fines in this case should be stricken.

CONCLUSION

The State has shown that there was sufficient evidence presented at trial that the reasonable trier of fact correctly convicted the Appellant on

one count of Rape of a Child in the First Degree and on one count of Child Molestation in the First Degree. Therefore the court should deny the Appellant's claims and uphold his convictions.

Additionally, the State agrees that the interest on the fines in this matter should be stricken.

DATED this 22 day of July, 2020.

Respectfully Submitted,

BY:


Jennifer Zorn
Deputy Prosecuting Attorney
WSBA # 49318

JZ /

GRAYS HARBOR CO PROS OFC

July 22, 2020 - 4:59 PM

Transmittal Information

Filed with Court: Court of Appeals Division II
Appellate Court Case Number: 53892-0
Appellate Court Case Title: State of Washington, Respondent v Ramil Agles Serrano, Appellant
Superior Court Case Number: 18-1-00591-7

The following documents have been uploaded:

- 538920_Briefs_20200722165559D2585217_1745.pdf
This File Contains:
Briefs - Respondents
The Original File Name was Resp Brief Serrano.pdf

A copy of the uploaded files will be sent to:

- Kelder@tillerlaw.com
- ptiller@tillerlaw.com

Comments:

Sender Name: Katie Svoboda - Email: ksvoboda@co.grays-harbor.wa.us

Filing on Behalf of: Jennifer Zorn - Email: JZorn@co.grays-harbor.wa.us (Alternate Email: appeals@co.grays-harbor.wa.us)

Address:
102 W BROADWAY AVE RM 102
MONTESANO, WA, 98563-3621
Phone: 360-249-3951

Note: The Filing Id is 20200722165559D2585217