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Court of Appeals
Division II
State of Washington
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NO. 54096-7

THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION TWO

STATE OF WASHINGTON,

Respondent,

v.

AARON EARL LAGRAVE,

Appellant.

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

APPELLANT'S OPENING BRIEF

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A. INTRODUCTION

Aaron Earl Lagrave and his girlfriend, Kimberlee Hunt, were friends with Ted Tetrault. One day, Aaron and Kimberlee went to visit Ted to collect their belongings that Kimberlee had left in his care. It is unclear precisely what happened, but there was an altercation that left Ted injured. While being treated for his injuries at the hospital, Ted told the medical staff he used methamphetamine daily.

The State charged Aaron with assault in the second degree. He claimed he acted to protect Kimberlee. Before trial, the State moved to exclude all evidence of Ted's daily methamphetamine use. Without ruling on the admissibility of the evidence, the trial court granted the State's motion. Excluding this evidence prevented the jury from evaluating the reasonableness of Aaron's actions from his perspective. Because the trial court violated Aaron's constitutional right to present a defense and abused its discretion when it excluded evidence without ruling on its admissibility, this Court should reverse his conviction.

B. ASSIGNMENTS OF ERROR

1. The trial court violated Aaron's constitutional right to present a defense when it excluded all evidence of the complainant's daily methamphetamine use.

2. The trial court abused its discretion when it excluded evidence without ruling on its admissibility.

C. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR

1. The accused has a constitutional right to present a defense. Aaron claimed the defense of others to the charge of assault. To support his defense, he wanted to introduce evidence of the complainant's daily methamphetamine use. Because the jury must put themselves in the defendant's shoes to determine whether the use of force was reasonable in light of the circumstances, the complainant's history of daily methamphetamine use was relevant and material to the defense. Did the trial court violate Aaron's constitutional right to present a defense when it excluded all evidence of the complainant's daily methamphetamine use?

2. When a party requests a pretrial motion in limine, the court is tasked with ruling on the admissibility of the evidence.

If admitted, the fact finder weighs the evidence. Did the trial court abuse its discretion when it excluded the evidence based on its weight and without ruling on its admissibility?

D. STATEMENT OF THE CASE

Aaron Earl Lagrave and his girlfriend, Kimberlee Hunt, were friends with their neighbors, Zane Tetrault and her son, Ted Tetrault. 11/20/19 RP 294. They met over a year ago when Kimberlee and Zane were picking blackberries nearby. 11/19/19 RP 158. For over a year, they helped each other and spent time together. Aaron mowed Zane's lawn. 11/19/19 RP 152. Ted sometimes watched Kimberlee's cat. 11/19/19 RP 116. Aaron and Kimberlee helped Ted with his work and also helped Zane with cleaning projects. 11/20/19 RP 294. They had friendly neighborhood visits, and sometimes they played Scrabble together. 11/19 /19 RP 122, 153.

When Kimberlee and Aaron's relationship was struggling, the Tetraults let Kimberlee stay with them for a few days. 11/20/19 RP 295. After she and Aaron reunited, Kimberlee temporarily left some of her belongings on the Tetrault property. 11/19/19 RP 159-60. Some of the items were stored in a locked

shed on the property. 11/19/19 RP 164. Aaron's bow and arrow were among the things Kimberlee left. 11/20/19 RP 296.

One morning, Aaron and Kimberlee went to the Tetrault property to pick up their belongings, including the bow and arrow. 11/20/19 RP 301, 305. At the time, three people lived there. Zane lived in the house, and Ted lived in his RV that was parked on the property. 11/19/19 RP 114-15. Another guest, Shannon Austin, was also temporarily residing on the property in her own RV, which was parked next to Ted's RV. 11/19/19 RP 123.

Early in the morning, Aaron and Kimberlee stopped by Zane's house to ask if they could access the locked shed to get their belongings. 11/19/19 RP 125. Zane told them to ask Ted: "If you talk to Ted, I'm sure he'll let you." 11/19/19 RP 125. They knocked on Ted's RV door. 11/19/19 RP 166. There was no answer, so they left. 11/19/19 RP 166-67.

Ted was in Zane's house at the time and did not talk to Aaron or Kimberlee. 11/19/19 RP 167. After they left, Ted smoked methamphetamine. 11/19/19 RP 168.

Later that morning, Aaron and Kimberlee returned to the Tetrault property. Aaron drove up in his pickup truck and parked in front of Ted's RV. 11/19/19 RP 300. Kimberlee was in the passenger seat. 11/19/19 RP 299. Aaron got out of the truck and asked Ted for his bow and arrows. 11/19/19 RP 305. Ted said, "The bow and arrow's [sic] not here. It's in Bucoda. It's down at my friend Harley's house." 11/19/19 RP 176.

The sound of the truck woke up Shannon. 11/19/19 RP 196-97. Shannon heard voices and came out of her RV to see what the matter was. 11/19/19 RP 198. Ted and Shannon both testified Aaron was acting aggressively. 11/19/19 RP 175, 200.

Kimberlee testified Ted and Shannon were hostile and aggressive towards Aaron. 11/20/19 RP 302. She said Shannon egged Ted on, saying, "If you feel froggy, jump." 11/20/19 RP 303. She believed Shannon and Ted both wanted a fight. 11/20/19 RP 304. Aaron tried to calm Ted down, saying, "we don't want to fight. We just want to get Kim's stuff." 11/20/19 RP 305. But Ted continued trying to antagonize Aaron by fake punching at him. 11/20/19 RP 304. Shannon went back into her RV to get a baseball bat. 11/19/19 RP 302.

Kimberlee was distracted when her cat jumped out of the truck. 11/20/19 RP 306. When she got out of the truck to grab it, Ted lurched and fake punched at Kimberlee. 11/20/19 RP 309. She was reaching under the truck to grab the cat and thought she saw Aaron punch Ted once, maybe twice. 11/20/19 RP 309-10, 333. She then saw Aaron help Ted lie down on the ground and ask, "Are you okay? Get up." 11/20/19 RP 310-11. At this point, Shannon emerged from her RV with a baseball bat, ready to swing at Kimberlee. 11/19/19 RP 203. She threatened to smash their windows, so Aaron and Kimberlee quickly left. 11/20/19 RP 311.

Besides Kimberlee, no other testifying witness saw what happened. Shannon did not see what happened because she went back into her RV to get her baseball bat. 11/19/19 RP 200; 11/20/19 RP 302. She could not hear clearly because her two dogs were barking in the RV, but she heard a sound and returned to see Ted lying on the ground. 11/19/19 RP 200, 216. She thought Aaron looked scared. 11/19/19 RP 216.

During the incident, Zane was at her house, standing outside on the terrace. 11/19/19 RP 127. The RVs were uphill

from the house, and Aaron and Ted were on the other side of the truck. 11/19/19 RP 120, 127. Zane saw some movement, but she could not see or hear what happened because the truck blocked her view. 11/19/19 RP 134-36.

After Aaron and Kimberlee left, Shannon and Zane found Ted unconscious on the ground and called 911. 11/19/19 RP 137. He regained consciousness shortly after that. 11/19/19 RP 138. The paramedics took him to the hospital with a dislocated jaw and a broken collarbone. 11/19/19 RP 178, 186. While he recalls events leading up to it, Ted has no memory of the incident and he has had issues with his memory ever since. 11/19/19 RP 175-76.

Aaron was arrested and charged with assault in the second degree. CP 5. While he was in jail awaiting trial, he was recorded discussing the case with Kimberlee and tried to convince her to testify in a certain manner. 11/20/19 RP 282-84. The State amended the information and charged Aaron with witness tampering. CP 9.

The morning of the incident, Ted admitted he smoked narcotics. 11/19/19 RP 168. At the hospital, he reported to

hospital staff he used methamphetamine “seven times a week.”
Supp. CP ___ (sub no. 46). However, he testified he was not
under the influence at the time of the incident. 11/19/19 RP 169.

Before trial, the State conceded Ted’s drug use the
morning of the incident was relevant and admissible but moved
to exclude all other evidence of Ted’s daily methamphetamine
use. 11/19/19 RP 10; Supp. CP ___ (sub no. 46). Aaron objected,
arguing the evidence was relevant to his defense. Supp. CP ___
(sub no. 53).

The court thought it was improper to admit evidence of
Ted’s daily methamphetamine use “to simply argue that because
a person ingested methamphetamine he or she acted in a
particular way.” 11/19/19 RP 11. The court also stated, “expert
testimony is necessary” to present evidence of “how
methamphetamine affects a person” and to discuss factors such
as amount, time, and tolerance. 11/19/19 RP 11. The court
granted the State’s motion and excluded all questions regarding
Ted’s daily methamphetamine use. 11/19/19 RP 10-11.

The jury found Aaron guilty on both charges. CP 51-52.

E. ARGUMENT

1. **The trial court deprived Aaron of his constitutional right to present a defense when it excluded all evidence of Ted's daily methamphetamine use.**

A person accused of a crime has a constitutional right to present a defense. U.S. Const. amends. VI, XIV; Const. art. I, § 22. This right guarantees the accused the opportunity “to present the defendant’s version of the facts” to the jury, not just the State’s version, so the jury “may decide where the truth lies.” *State v. Thomas*, 150 Wn.2d 821, 857, 83 P.3d 970 (2004).

Aaron’s defense was that he acted to protect Kimberlee from Ted. A person may use necessary force to prevent harm to another person. RCW 9A.16.020(3). Whether the use of force was reasonable depends on the defendant’s apprehension of danger. *State v. Kirvin*, 37 Wn. App. 452, 458-59, 682 P.2d 919 (1984). The jury must evaluate the defense from the defendant’s point of view. *State v. Allery*, 101 Wn.2d 591, 594, 682 P.2d 312 (1984). Therefore, jurors must be placed in the defendant’s position to determine whether his actions were reasonable in light of all the circumstances. *Id.*

Ted's daily methamphetamine use was material and relevant to Aaron's defense that Ted was the first aggressor and that Aaron acted to protect Kimberlee. The court's exclusion of this evidence violated Aaron's constitutional right to present a defense. Therefore, reversal is proper.

On appeal, this Court reviews a trial court's ruling on a motion in limine for an abuse of discretion. *State v. Powell*, 126 Wn.2d 244, 258, 893 P.2d 615 (1995). The court abuses its discretion when its decision "is manifestly unreasonable or based on untenable grounds." *Id.* However, "[t]he exclusion of evidence which a defendant has a constitutional right to elicit is an unreasonable exercise of discretion." *State v. Reed*, 101 Wn. App. 704, 709, 6 P.3d 43 (2000). Reversal is required for constitutional violations unless the State can prove the error was harmless beyond a reasonable doubt. *State v. Guloy*, 104 Wn.2d 412, 425, 705 P.2d 1182 (1985).

a. The trial court erred when it excluded evidence of Ted's daily methamphetamine use because the evidence is relevant and material to Aaron's defense that Ted was the first aggressor.

The court's exclusion of evidence of Ted's habitual methamphetamine use violated Aaron's constitutional right to

present a defense. Evidence is relevant if it has “any tendency to make the existence of any fact that is of consequence to the determination of the action more or less probable than it would be without the evidence.” ER 401. Evidence of Ted’s daily methamphetamine use and its effect on him was relevant and material to the issue of whether Ted was the first aggressor and whether Aaron acted to protect Kimberlee.

The court only allowed evidence of Ted’s methamphetamine use the morning of the incident. 11/19/19 RP 10-11. However, because of the different characteristics between an addict versus an occasional methamphetamine user, this evidence does not allow Aaron to illustrate the circumstances surrounding the incident. Indeed, as opposed to one-time use, “prolonged methamphetamine use can result in serious health problems, including . . . aggression [and] psychosis.” Raphael S. Nemes, *Shake and Bake: The Meth Threat and the Need to Rethink 21 U.S.C. § 841(c)(2)*, 88 Wash. U. L Rev. 993, 995 (2011). Evidence of habitual methamphetamine use was circumstantial evidence that Ted was the first aggressor.

Given the opportunity, Aaron could have presented credible, non-speculative evidence about Ted's daily drug use. Aaron and Kimberlee knew Ted for well over a year. Zane is Ted's mother, and Shannon lives in an RV next to Ted. These witnesses could have testified about Ted's daily methamphetamine use and its effect on him. Also, as Aaron's counsel proposed, the two testifying officers could have been qualified to testify as expert witnesses based on their training and experience.

Not only was evidence of Ted's daily methamphetamine use relevant, but it was also admissible. Ted told medical professionals he used methamphetamine daily, and those statements could be admitted as non-hearsay statements for purposes of medical diagnosis or treatment. Supp. CR ___ (sub no. 46); ER 803(a)(4). The evidence could also be admitted as character evidence for Ted because daily methamphetamine use is a pertinent trait relevant to the claim that Ted was the first aggressor. ER 404(a)(2). Or, the evidence could also be admitted as other acts to prove Aaron's knowledge at the time of the incident. ER 404(b).

This evidence was material to Aaron's defense. Were Aaron's attorney permitted to ask the witnesses about Ted's daily methamphetamine use and how it impacted his behavior, the jury could have been able to put themselves in Aaron's position to determine whether his actions were reasonable under the circumstances. *Allery*, 101 Wn.2d at 594.

Stated differently, the jury must be equipped to determine whether Aaron acted reasonably in light of Ted's daily methamphetamine use. The court's ruling prevented Aaron from asking the witnesses about Ted's daily drug use and its effect on him. The ruling also prevented Aaron from asking law enforcement officers what typical effects habitual methamphetamine use has on a person's behavior. Without this evidence, the jury was unable to evaluate the reasonableness of Aaron's actions from his perspective.

Because the court excluded relevant and material evidence of Ted's daily methamphetamine use, the jury was not permitted to evaluate the situation from Aaron's perspective. Therefore, the court deprived Aaron of his right to present a defense and reversal is required. *Guloy*, 104 Wn.2d at 425.

b. The court's error was not harmless beyond a reasonable doubt because the excluded evidence was material to Aaron's defense.

Because the error was of constitutional magnitude, a reviewing court presumes prejudice and the State bears the burden of proving the error in this case was harmless beyond a reasonable doubt. *Guloy*, 104 Wn.2d at 425. An error is not harmless where there is "a reasonable probability the outcome of trial would have been different had the error not occurred." *Powell*, 126 Wn.2d at 267. "A reasonable probability exists when confidence in the outcome of the trial is undermined." *Id.*

The court's error was not harmless because the evidence was necessary for Aaron's defense. Ted's daily methamphetamine use was relevant and material to Aaron's perception of Ted's behavior at the time. Defense of others is evaluated "from the standpoint of a reasonably prudent person, knowing all the defendant knows." *State v. Janes*, 121 Wn.2d 220, 238, 850 P.2d 495 (1993). Therefore, the jury must consider evidence of Ted's daily methamphetamine use and its effect on his behavior because it was part of Aaron's perception when he considered how to protect Kimberlee. Without knowing this, the

jury could not evaluate whether a “reasonably prudent person” would have acted as Aaron did under the circumstances.

Further, the court’s exclusion of this evidence was not harmless because it correlates with Kimberlee’s testimony and supports his defense. Without this evidence, Aaron had little to prove his argument. Kimberlee’s testimony was the only evidence to support his defense. However, Kimberlee previously gave inconsistent statements to law enforcement. Evidence of Ted’s habitual methamphetamine use and its effect on his behavior supports Kimberlee’s testimony at trial that Ted was the first aggressor and that Aaron acted to protect her. Because the error was not harmless beyond a reasonable doubt, reversal is required.

2. Further, the trial court abused its discretion when it excluded evidence of Ted’s daily methamphetamine use based on its weight rather than its admissibility.

The trial court abused its discretion when it failed to rule on admissibility of the evidence before excluding it. The purpose of a pretrial motion in limine is for the court to rule on the admissibility of evidence, including weighing the probative value against the prejudicial effect. Milton J. Carter, Jr., *Motions in*

Limine in Washington, 9 Gonz. L. Rev. 780, 787 (1974). The weight of the evidence is exclusively reserved for the fact finder to consider. *State v. Snider*, 70 Wn.2d 326, 327, 422 P.2d 816 (1967).

Here, the State moved to exclude evidence of Ted's habitual methamphetamine use, arguing it was not relevant. Supp. CP ____ (sub no. 46). Aaron objected, arguing it was relevant to who was the first aggressor. Supp. CP ____ (sub no. 53). However, the trial court did not make a ruling based on relevancy or admissibility. Instead, the trial court evaluated the weight of the evidence rather than its admissibility and excluded it. 11/19/19 RP 10-11.

The court was concerned that an expert witness was not available to describe the effect methamphetamine can have on a user. The court stated an expert witness was necessary to present evidence regarding several factors, such as "the amount of methamphetamine ingested, the time when it was ingested . . . how it might affect one particular person as opposed to how it might affect another particular person and the person's tolerance to methamphetamine." 11/19/19 RP 11. That

an expert witness may be necessary to present evidence regarding how daily methamphetamine use affects a person is not a reason to exclude this evidence. The court was erroneously concerned with the weight of expert testimony rather than the admissibility of the evidence. *See generally State v. Copeland*, 130 Wn.2d 244, 922 P.2d 1304 (1996) (issues regarding quality and content of evidence go to weight rather than admissibility).

The court is tasked with determining admissibility, and the jury determines the weight and credibility of the evidence. Evidence is relevant if it has “any tendency to make the existence of any fact that is of consequence to the determination of the action more or less probable than it would be without the evidence.” ER 401. Evidence of a person’s habitual drug use and its effect on the person’s character is relevant to the issue of whether that person was the first aggressor. This evidence could have been admitted under several different evidentiary rules. *See* ERs 803(a)(4), 404(a)(2), 404(b). However, even though the evidence was relevant and admissible, the court excluded the evidence based on the weight of the evidence without ruling on its admissibility.

Further, the court did not consider the purpose for which Aaron wanted to admit the evidence before excluding it. Aaron argued the evidence was relevant to whether Ted was the first aggressor. Supp. CP ___ (sub no. 53). Instead of weighing the relevance, purpose, or admissibility of the evidence, or even weighing the probative value against the prejudice, the court summarily concluded it was inadmissible and excluded it. Because the court's decision was "manifestly unreasonable" and "based on untenable grounds, this was an abuse of discretion. *Powell*, 126 Wn.2d at 258.

F. CONCLUSION

The trial court violated Aaron's constitutional right to present a defense when it excluded evidence of Ted's daily methamphetamine use. Further, the trial court abused its discretion when it excluded the evidence without ruling on its admissibility. Aaron's conviction should be reversed.

DATED this 7th day of July 2020.

Respectfully submitted,

A handwritten signature in black ink that reads "Beverly Tsai". The signature is written in a cursive, flowing style.

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)	NO. 54096-7-II
v.)	
)	
AARON LAGRAVE,)	
)	
Appellant.)	

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