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Division II
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No. 54110-6-II

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

STATE OF WASHINGTON,

Respondent,

v.

Nga Ngoeung,

Appellant.

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

REPLY BRIEF OF APPELLANT

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A. ARGUMENT IN REPLY

1. The court erred in denying Nga's motion to recuse.

- a. The Court of Appeals' footnote about the appearance of fairness is dicta, not the law of the case.

The State's claim that this Court decided the issue of recusal in Nga's 2015 appeal is meritless. This Court's comment in a footnote was not a ruling on this issue, and so Nga was not foreclosed from raising this at his resentencing on remand, which was the correct time to move for recusal.

The State claims that the Court of Appeals footnote unrelated to the holding from Nga's appeal of his 2015 resentencing is the "law of the case." Br. of Resp. at 17. The law of the case doctrine, however, "stands for the proposition that once there is an appellate holding enunciating a principle of law, that holding will be followed in subsequent stages of the same litigation." *State v. Johnson*, 188 Wn.2d 742, 755, 399 P.3d 507 (2017). This Court did not render a holding on the issue of recusal as required for this doctrine to apply. Rather the court held that on remand, Nga was not was not entitled to new trial counsel. CP 57. The Court only noted in a footnote that a new

sentencing judge is *probably* not required at resentencing. CP 64.

This comment about an issue not before the Court is not a holding that binds a subsequent court. It is only dicta because it was “not necessary to the court’s decision in a case.” *Protect the Peninsula’s Future v. City of Port Angeles*, 175 Wn. App. 201, 215, 304 P.3d 914 (2013) (citing *Ruse v. Dep’t of Labor & Indus.*, 138 Wn.2d 1, 8-9, 977 P.2d 570 (1999)). “Dicta is not binding authority.” *Id.*

The State misleadingly claims that “counsel conceded that the higher court’s decision denying judicial qualification was ‘obviously binding.’” Br. of Resp. at 13. The record reflects rather, that counsel understood the Court of Appeals had ruled on the sentencing court’s consideration of the *Miller*¹ factors, and that generally the Court of Appeals’ decisions were binding.

8/9/19 RP 7. Counsel did not mention the issue of recusal.

The general rule is that recusal is raised at the trial court, not on appeal. *State v. McEnroe*, 181 Wn.2d 375, 390, 333 P.3d

¹ *Miller v. Alabama*, 567 U.S. 460, 132 S. Ct. 2455, 183 L. Ed. 2d 407 (2012).

402 (2014). Nga properly raised this issue to the trial court at his 2019 resentencing.

Because the Court of Appeals' footnote was dicta, not a holding, there was no decision from this Court that foreclosed Nga from seeking recusal of the sentencing judge on remand. The State's claim must be rejected.

- b. The State fails to show the trial court was not biased in sentencing Nga to die in prison despite evidence of his cognitive disability and the fact that he shot no one.

The State inaccurately characterizes Nga's argument, claiming he asserts "that the imposition of a life sentence in 2015 in and of itself demonstrates prejudging and bias." Br. of Resp. at 19. It is not the court's imposition of a life sentence itself that establishes bias, but the fact that the court imposed a life sentence for conduct Nga committed as a cognitively disabled teenager, the court's judgment about Nga, his family, the victims' suffering, and what the court perceived to be the "sociopathic" act despite no evidence of sociopathy. These factors are what would lead a disinterested observer to conclude that Nga did not receive a "fair, impartial, and neutral hearing." *State v. Solis-Diaz*, 187 Wn.2d 535, 540, 387 P.3d 703 (2017).

In Nga's motion for recusal, he highlighted the court's overweighting of the victims' suffering compared to its *de minimus* consideration of the *Miller* factors. 8/9/19 RP 6. On appeal, the State claims to "know[] of no authority which would suggest that an offender's mitigation arguments must be prioritized over the victim's loss." Br. of Resp. at 20. This reflects the State's misunderstanding of the purpose of *Miller* hearing, which is for the "sentencing judge [to] consider specific criteria that account for the diminished culpability of youth." *State v. Delbosque*, 195 Wn.2d 106, 129, 456 P.3d 806 (2020). Nga is not asking for prioritization of the *Miller* factors over the victims' loss. He is asking for the balanced consideration of competing factors which exemplifies a court's use its discretionary authority. The victims' suffering in this case is unrelated to the *Miller* factors, all of which pertain to the child-defendant's characteristics. *Gilbert*, 193 Wn.2d at 176.

The State wrongly claims that asking the court to consider that Nga was the driver, not the shooter, "fail[s] to respect the jury's verdict and the law on accomplice liability." Br. of Resp. at 18. To the contrary, *Miller* notes the critical

difference in culpability between the “shooter and accomplice” when sentencing children tried as adults. *Miller*, 567 U.S. at 477. Opening Br. at 34.

The State also disputes defense counsel’s characterization of the judge’s reference to sociopathy. Br. of Resp. at 22-25. The court twice referred to Nga’s conduct as “sociopathic;” first in trying to determine the “motivational or other factors that resulted in such a sociopathic response to nothing.” 1/23/15 RP 39. Then again, despite the mitigation evidence detailing the socioeconomic and psychological factors that led to this tragedy, the court concluded:

Despite my effort to gain understanding, Mr. Ngoeung, of your brutal and murderous rampage, I am unable to perceive any rational basis for your morally bankrupt and sociopathic behavior. You deserve, in the Court’s opinion, to serve every day of the sentence that you have been given.

1/23/15 RP 55.

However, the court was presented with ample evidence explaining why Nga was in the position of driving the car that tragic night. A competency evaluation close in time to the offense found Nga was less “sophisticated and aggressive” than

his younger co-defendants. CP 586. One evaluator found Nga had low cognition that reflected mild to moderate mental retardation. CP 574-75. Nga had no history of aggressive behaviors in school or violent criminal history that supported the conclusion that his acts were driven by sociopathy. CP 586. However, Nga's mental health diagnoses of social phobia (causing him to lack assertiveness and to be submissive), along with other mental health diagnoses of post-traumatic stress disorder, anxiety, and depressive disorders, combined with the multiple life traumas and fear of his co-defendants, made Nga unable to take "alternative courses of action" for the criminal conduct that resulted in the tragic loss of life at the hands of Nga's passenger. CP 587.

In its statement of the case, the State tries to minimize the evidence of Nga's limited cognition, but the psychological reports the court reviewed support no other conclusion than that Nga's intellectual functioning was borderline at most, which the

court again found was amply established in his 2019 resentencing.² CP 585-86.

The court also blamed Nga's family for this violent tragedy, despite evidence of their own profound deprivation and challenges after escaping genocide and relocating to a country with inadequate resources to help their children: "[D]espite the sorrow that they may feel at the incarceration of their loved one, Mr. Ngeung, they contributed to that behavior. So that's on them." 1/23/15 RP 53. Increasing the defendant's sentence because of his parents' flight from oppression, even if that tragically undermined their ability to parent, plays no proper part in any sentencing scheme.

The court's judgment on these facts about Nga's life established at a minimum, the sentencing court "has strong opinions" on the evidence, and had already "reached a firm

² Notably, the State's reference to a report of "probable personality disorder," Br. of Resp. at 22, to support the court's description of "sociopathy" was from the mitigation specialist's summary of Dr. Gagliardi's report, whose evaluation was not part of the packet presented by the defense or presented by the State in the 2015 sentencing hearing, but rather included in a mitigation specialist's summary. Br. of Resp. at 22 (citing CP 575). The court specifically stated it would rely on the substantive reports, which in 2015 included Dr. Lee's report, CP 585-89, and included no such diagnosis.

conclusion about the propriety of a mitigated sentence in this case and may not be amenable to considering mitigating evidence with an open mind.” *Solis-Diaz*, 187 Wn.2d at 541. The judge erred in granting Nga’s motion to recuse when resentencing him based on much of the same evidence at Nga’s resentencing in 2019.

2. The trial court sentenced Nga without articulating its consideration of the *Miller* factors or explaining why he was entitled to a mitigated, concurrent sentence for the aggravated murder charges, but not the assaults, even though his diminished culpability necessarily applied equally to all convictions.

a. The existence of a parole eligibility statute is irrelevant to the legality of the court’s sentence.

The State claims on appeal that Nga cannot appeal the court’s sentence because of the existence of a statute that the ISRB could interpret contrary to the court’s actual sentence. This is wrong because the DOC lacks the authority to ignore or refuse to follow the court’s sentence.

The court sentenced Nga to two concurrent 25-year to life sentences on the aggravated murder charge, then ordered

[T]wo 25 year to life terms of imprisonment that will be served concurrently. And then they will be followed consecutively on Counts III and IV by 102 months on Count III and 93 months on Count IV. By my rough calculation,

that comes to 195 months that will be consecutive to the 25 years to life sentence for the murders. After all of that time is done, then the ISRB will be able to make its determinations.

9/6/19 RP 96.

Despite this clear order that Nga shall serve consecutive sentences, or a total of over 41 years before he becomes parole eligible, on appeal, the State asserts the DOC will override the court's unambiguous consecutive sentence by application of RCW 9.94A.730. Br. of Resp. at 27-29. The State notably lacks citation to any authority that supports this claim, which is contrary to the well-established rule that the "DOC has no authority to correct or ignore a final judgment and sentence, even if it is erroneous." *Dress v. Washington State Dep't of Corr.*, 168 Wn. App. 319, 328, 279 P.3d 875 (2012); *see also State v. Broadaway*, 133 Wn.2d 118, 135, 942 P.2d 363 (1997) ("Department of Corrections is not authorized to correct an erroneous judgment and sentence."). It is the duty of the courts to correct an erroneous judgement and sentence. *Id.* It is thus immaterial that there is a statute that would otherwise make Nga parole eligible under RCW 9.94A.730.

Even if the State were correct that the DOC need not follow the sentence ordered by the court, this does not mean the ISRB would not take the court's order of a consecutive sentence into account in deciding whether to release Nga on parole, even if it applied RCW 9.94A.730 contrary to the court's sentence as the State claims it will. The ISRB could also find Nga to be parole eligible for one of his consecutive terms, but not release him until he completes service of his second consecutive term as ordered by the sentencing court. Moreover, the parole eligibility statute could change at any time, so it is not a remedy that Nga is guaranteed even if the State was correct that RCW 9.94A.730 will override the court's sentence.

If it is true, as claimed by the State, that the court's consecutive terms are mere "symbolic acknowledgement," Br. of Resp. at 28, then this symbolism must be achieved in a way that does not risk imprisoning Nga beyond the minimum term the State claims he will serve. Should this Court agree with the State that the court's sentence is merely "symbolic," and refuse to review his appeal on this ground, his case must be remanded for entry of a concurrent term to ensure the DOC treats the

court's otherwise clearly articulated consecutive sentence as the mere "symbolic" gesture the State claims it is.

- b. The sentencing court did not meaningfully consider the *Miller* factors as required by *Gilbert* and *Delbosque*.

The State's response reflects a fundamental misunderstanding of the purpose and requirements of a *Miller* hearing, especially in light of recent clarification provided by *Delbosque*³ and *Gilbert*.⁴ The *Miller* factors must meaningfully be considered. *Delbosque*, 195 Wn.2d at 120. Full consideration requires the sentencing court to "reconcil[e]" and "acknowledg[e]" contrary evidence. *Id.* The court must fully explain its reasoning in deciding whether to impose an exceptional sentence. *Gilbert*, 193 Wn.2d at 176. This consideration must apply to the entire sentence. *Id.* at 176-77.

The State asserts, but does not show that the court meaningfully considered each of the *Miller* factors or that "the court did consider the total sentence." Br. of Resp. at 30-32. The court's findings turn almost entirely on Nga's limited cognitive ability at the time of the offense as a basis for finding

³ *State v. Delbosque*, 195 Wn.2d 106, 456 P.3d 806 (2020).

⁴ *State v. Gilbert*, 193 Wn.2d 169, 438 P.3d 133 (2019).

his culpability was reduced for the aggravated murder convictions. FF 10-18. But the court imposed a standard range, consecutive sentence for the assault convictions. CP 486. In the absence of any findings or explanation by the court justifying the standard range consecutive terms for the assault convictions, the State develops its own theory of why the court's finding of diminished culpability does not extend to these offenses, arguing:

He [Nga] does not have a right to receive no incarceration for his crimes against Clinton Thayer and Matthew Nordin. These survivors live with the memories of cowering on the floor of the car, crawling through shattered windows, fleeing under gunfire, struggling to save Michael as he collapsed, and finding Robert's exploded corpse.

Br. of Resp. at 31-32.⁵

Nowhere in the court's findings, either oral or written, does the court state the number of victims and their particular suffering drove its decision to impose consecutive terms for

⁵ The State provides no citation for this emotionally charged account of events. Presumably this is an embellishment derived from the victim impact statements from the 2015 hearing which the State relies on for its statement of the case related to the offense. Br. of Resp. at 3-4. Notably, the trial prosecutor introduced the victims' testimony as not "necessarily germane to the issue of the exceptional sentence." 9/6/19 RP 9.

Nga's assault convictions. FF 1-18. The State's post hoc justification for a standard range consecutive sentences demonstrates the problem with the court's failing to meaningfully consider the *Miller* factors and explain its reasoning as required by *Delbosque* and *Gilbert*—any justification for the court's sentence can be provided. It is impossible to understand the court's reason for imposing a sentence of 41 years, rather than the minimum 25-year-term without this explanation. Without a thorough explanation of the basis for the court's sentence, there an impermissible risk that a court will base is sentence is based on facts or beliefs that are unsupported by the record or contrary to the *Miller* factors the court is required to consider.

The State fails to address *Delbosque's* requirement that the sentencing court reconcile and acknowledge contrary evidence. 195 Wn.2d at 118-19. The court failed to reconcile Nga's diminished culpability, reflected in undisputed findings that Nga suffered from significant cognitive limitations, with the court's discussion of Nga's prison infraction history, if in fact this was the basis for the court's decision to not impose the

minimum term after finding Nga's culpability was significantly diminished when he drove the car. FF 10-18; Op. Br. at 36-39.

Notably, the court also failed to consider that Nga was the driver of the car, not the shooter, which *Miller* specifically provides as a factor that should be considered in a court's assessment of culpability. *Miller*, 567 U.S. at 477-78.

The State's justification for this consecutive term that contradicts the court's written and oral findings demonstrates that the court failed to adequately explain its reasoning in imposing this consecutive term. The sentencing court was required to meaningfully consider the *Miller* factors and explain its reasoning in respect to its decision to impose an exceptional sentence. The court's failure to thoroughly explain its reasoning or meaningfully consider each of the *Miller* factors leaves this Court in the position to only guess at the reasons for the court's imposition of a 41-year prison term—well above the minimum concurrent term Nga requested. The courts failure to conform to the stringent requirements of a *Miller* hearing entitles Nga to a new sentencing hearing.

- c. The sentencing court misallocated the burden of proof to Nga, requiring reversal and remand for resentencing.

The sentencing court applied the SRA's framework to the assault convictions in resentencing Nga pursuant to RCW 10.95.030, which was error. The State tries to minimize this misapplication, Br. of Resp. at 33-34, but this framework erroneously placed the burden on Nga to prove an exceptional sentence was warranted for his assault convictions under RCW 9.94A.589(1)(b).

The State's citation to Nga's counsel's request for an "exceptional sentence" of concurrent terms based on *Gilbert* can in no way be seen as an "express invitation" for the trial court to misallocate the burden of proof to Nga. Br. of Resp. at 33. *Gilbert* directly supported Nga's request to run the assault convictions concurrently regardless of RCW 9.94A.589(1)(b)'s mandatory provision. 193 Wn.2d at 174. *Gilbert* does not provide that the sentencing court should adopt the exceptional sentencing framework of RCW 9.94A.535(1) and Nga in no way invited the court to impose this burden on him.

The court resentenced Nga before the Supreme Court decided *Delbosque*, which clarified that no party has the burden of proof at a *Miller* resentencing. 195 Wn.2d at 123. Because the court proceeded as if Nga had this burden, reversal and remand is required.

- b. The court's failure to presume an exceptional downward sentence is not moot, because the court did not sentence Nga to the minimum term.

The State claims that the pending decision in *State v. Gregg*, 9 Wn. App.2d 569, 444 P.3d 1219 (2019), *review granted*, 194 Wn.2d 1002, 451 P.3d 341 (2019) (argued Feb. 25, 2020), does not affect Nga's case because "he has been sentenced to the lowest sentence possible." Br. of Resp. at 33. This is simply wrong. The lowest sentence possible is a concurrent, minimum term for all sentences, which Nga requested, but the sentencing court did not impose.

As discussed in section 2(a), *supra*, the court's order of consecutive terms for the assaults resulted in a sentence well above the minimum term. The State's conjecture about the DOC's interpretation of a statute contrary to the court's sentence does not change the court's sentence. Until Nga is

either released on parole or the State allows the purportedly “symbolic” consecutive term to be stricken to ensure it is not enforced by the DOC, Nga’s appeal is not moot.

Should this Court not reverse on the various grounds, this case should be stayed pending the Supreme Court’s decision in *Gregg*.

- c. The State wrongly asserts the SRA’s standard range is the presumptive sentence when the defendant is resentenced pursuant to RCW10.95.030.

The State claims that there is no authority for Nga’s argument that the State had the burden to show the adult, standard range should apply in respect to his assault convictions, and criticizes his use of the term “adult-range sentence” as a “rhetorical device” to describe the SRA’s standard range. Br. of Resp. at 32. However, this is precisely how *Houston-Sconiers* described the SRA’s standard range sentence as applied to teenagers, describing that they faced “lengthy adult sentencing ranges calculated under adult Sentencing Reform Act of 1981 . . . [a]nd they received lengthy adult firearm sentence enhancements, with their mandatory,

consecutive, flat-time consequences. *State v. Houston-Sconiers*, 188 Wn.2d 1, 8, 391 P.3d 409 (2017) (emphasis added).

The State's argument ignores the fact that Washington Courts refuse to treat children as "miniature adults" for sentencing. *State v. Bassett*, 198 Wn. App. 714, 738, 394 P.3d 430 (2017), *aff'd*, 192 Wn.2d 67, 428 P.3d 343 (2018).

Presumptive application of the standard range sentence impermissibly treats the child the same as an adult offender, or "the rare juvenile offender" whose culpability is akin to that of an adult. *Miller*, 567 U.S. at 479 (internal quotation omitted).

The State's belief that once it obtains a conviction, regardless of whether the defendant is an adult or a child whose offense was mitigated by youth, "the result is a presumptive sentence as the SRA dictates," is contrary to the Supreme Court's evolving body of case law on the sentencing of juveniles in adult court. Br. of Resp. at 36.

The State does not factually counter Nga's claim that the prosecutor failed to meet its burden to show an adult, standard range sentence was permissible, arguing only that it had no burden to overcome. Op. Br. at 54-57. This Court should reverse

because the State failed to meet its burden to show the SRA's provision for consecutive sentencing under RCW 9.94A.589(1)(b) should apply.

C. CONCLUSION

The State's defense of the court's sentence reflects a fundamental misunderstanding of the purpose and requirements of a *Miller*-hearing. Nga is entitled to a new sentencing hearing before a different, unbiased sentencing judge.

DATED this the 17th day of August, 2020.

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