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No. 54135-1-II

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

DIVISION TWO

STATE OF WASHINGTON,

Respondent,

v.

PITA DALLAS ILI,

Appellant.

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

The Honorable Chris Lanese, Judge
Cause No. 18-1-01824-34

BRIEF OF RESPONDENT

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A. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR.

1. Whether the trial court abused its discretion by finding that there was insufficient testimony to support a conclusion that Juror number 29 was actually or implicitly biased due to his acquaintance with Officer Maclurg and service as a chaplain for the Lacey Police Department where he specifically indicated that he would not view Officer Maclurg's testimony different than any other witness and nothing in the record indicated that Juror 29 had a personal or financial interest in the outcome of the proceeding.

2. Whether the defense's failure to renew its motion to excuse Juror 29 for cause demonstrates that no facts supported a conclusion different than the original finding of the trial court denying the motion to excuse Juror 29 for cause.

B. STATEMENT OF THE CASE.

Aaron Klien was a new employee at Custom Choice Door on October 19, 2018. RP 129-130.1 He started the day at a warehouse in Lakewood, Washington, loading his truck for a delivery. RP 130. The appellant, Pita Ili, also worked at Custom Choice Door. RP 132. Klien had contact with Ili while loading a

¹ The verbatim report of proceedings of the trial that occurred August 20-22, 2019, is reported in two volumes, sequentially numbered and collectively referred to herein as RP. The sentencing hearing that occurred on November 19, 2019, is referred to herein as 2 RP.

truck and noted that Ili was “a little hostile,” and stated that Klien should be moving a lot quicker. RP 133-134. Klien testified that Ili made comments “getting [Klien] down for moving at a slower pace,” three to four times. RP 135.

The third time that Ili made statements toward Klien, Klien stated that he “wasn’t going to take it.” RP 136. Klien then went and told the owner’s nephew about the incident. RP 137-138. Klien then proceeded to the job site in Lacey, Washington. RP 140. At the job site, Ili again confronted Klien. RP 142. Klien was heading toward the truck to grab another set of doors and Ili “got into [Klien’s] face and immediately said, ‘what were you saying at the warehouse?’” RP 143. Klien testified that he was face-to face, “not even really a fist away.” RP 143. Ili was speaking in an aggressive tone and was “very forceful in the way he was coming across and the way he was saying things.” RP 144.

Klien testified, “I told him I wasn’t gonna take it. He was like at that point, ‘What the fuck are you gonna do about it,’ at which time Klien asked Ili numerous times to get out of his face. RP 144. At the end of the verbal exchange, Ili lunged towards Klien and put his hands around Klien’s throat. RP 145. Klien indicated that Ili grabbed him “extremely forceful, enough that [it] caused [Klien] to

then go backwards.” RP 147. Klien fell on his back and his head hit the corner of a building causing a small laceration. RP 147.

Klien testified that Ili’s hands on his neck affected his ability to breathe. RP 148. Klien stated, “I could immediately not breathe, and as he was squeezing harder and harder, it was getting even more restrictive.” RP 148. As the attack continued, Klien stated, “It was getting more and more painful to breathe, and it got to a point to where I felt and heard something go pop in my neck.” RP 149. Klien got lightheaded and dizzy, especially when he stood up. RP 149. The attack ended when other people pulled Ili off of Klien. RP 151.

Dustin Fritz, another employee of the company, observed the incident. RP 233, 248. He testified that heard a verbal altercation and saw Ili grab Klien “and then force him down to the ground. RP 248. Fritz indicated that he saw Ili “throw him down to the ground.” RP 248. Ili “had [Klien] going down to the ground, holding him by the throat.” RP 248. Fritz and a couple of the other drivers grabbed Ili’s arm and pulled him off of Klien. RP 255. Fritz told Ili to leave the scene and head back to the shop prior to law enforcement arriving. RP 255.

After the incident, Klien still had difficulty breathing and continued to have pain. RP 153. Klien reported the incident to law enforcement and medics responded. RP 154. Klien had difficulty speaking after the incident. RP 155-156. Officer Dave Maclurg of the Lacey Police Department responded to investigate the incident. RP 271, 274. Officer Maclurg contacted Klien who was being evaluated by the fire department when Maclurg arrived. RP 275. Officer Maclurg could see redness on Klien's skin through a gap in the neck brace that had been put on Klien. RP 226. Officer Maclurg noticed an abrasion on the back of Klien's head that looked fresh and took photographs at the scene. RP 227.

Officer Maclurg conducted a recorded interview with Klien and noted that he was having difficulty speaking, wincing when he swallowed and trying to clear his throat. RP 280-281. Maclurg indicated "it sounded like he was having a hard time clearing his throat and that he had a hard time swallowing." RP 281-282. An audio example of Klien's speech was admitted and played for the jury. RP 285-287.

Officer Maclurg later spoke with Ili by phone and at the Lacey Police Department. RP 288. Officer Maclurg testified that while talking with Ili over the phone, Ili stated that Klien told him to

get out of his face and Ili lost control. RP 291. Ili told Maclurg, "I just choked him for a few second." RP 292. During an audio recorded statement at the Lacey Police Department, Ili described gripping something with his hand while talking about the point where he lost control. RP 293, 246.

Following the incident, Klien was seen at Providence St. Peter Hospital by Dr. Larry Fontanilla. RP 197, 199. Dr. Fontanilla testified that Klien was complaining of pain in the side of his neck. RP 200. During his examination, Dr. Fontanilla noted that Klien was tender over both sides of his neck and had a small bruise on one side. RP 201. Dr. Fontanilla stated there was swelling and bruising at the site. RP 203. Dr. Fontanilla indicated that Klien had "soft tissue contusions to his neck," and noted that Klien stated his voice seemed strange, which Fontanilla felt could be a type of vocal injury. RP 204.

Klien received follow up care from speech language pathologist Leann Stacey. RP 211-212, 214. Stacey indicated that Klien presented with a voice disorder called dysphonia, which caused his voice to be extremely strained and rough. RP 214-215. Stacey testified that such an injury can be caused by injury or

illness and could be caused by forceful pressure on the neck. RP 218.

As a result of the incident, Ili was charged with assault in the second degree. CP 4. The matter proceeded to jury trial on August 20, 2019. RP 1. During jury selection, the trial court asked the entire juror panel, "Have any of you heard of this case before today?" and no juror responded. RP 20. In response to the trial court's question to the venire about whether anyone know Officer Dave Maclurg, Juror 29 responded, "I'm former law enforcement and current chaplain for Lacey Police Department." RP 22. Juror 29 subsequently disclosed that he was previously a reserve police officer for the City of Lacey, but it had been "almost five years" since he had been a reserve officer. RP 22, 53. The trial court then asked:

And if you were selected to serve as a juror in this case, would your current position and your prior position as it touches upon your familiarity with Officer Maclurg cause you to potentially give more weight to his testimony if he's called as a witness in this trial than another witness.

RP 22-23. Juror 29 unequivocally responded "no." RP 23.

The defense moved to excuse Juror 29 for cause based on his familiarity with Officer Maclurg and the depth of potential

familiarity as the chaplain. RP 33. The trial court ruled, "I'm going to for now deny the motion as to 29. It may be renewed after voir dire if we can have a discussion then." RP 34. During subsequent questioning, Juror 29 was not asked if he received compensation for his service as a police chaplain, and in response to later questioning indicated that he was a "volunteer chaplain," though that response was not specific as to whether that included the Lacey Police Department. RP 71.

When defense counsel asked if "people ever exaggerate what happened to law enforcement," Juror 29 responded, "yeah, absolutely." When Juror 29 was asked about his prior jury service, he indicated:

I would say reaching a verdict was challenging because in the case I was on, the prosecution, law enforcement and stuff - - they didn't do a good enough job to bring something to say, hey, we can come to for a sure agreement here.

RP 66. He continued:

So the challenge was trying to get – because you have – so you start going through the evidence and realizing, as was stated, that this is somebody's livelihood or something that's at stake here, you know. So it makes it hard because it's another person involved and we should care about. We're all human beings and we care about them.

RP 66.

At the end of general questioning to the venire, the defense did not renew its motion to excuse Juror 29 for cause. RP 91-94. Juror 29 ultimately served on the jury. RP 94.

After the State's case in chief, Ili testified on his own behalf. RP 308. He indicated that Klien acted aggressive toward him in the warehouse. RP 310. At the job site in Lacey, Ili testified that he confronted Klien about using his personal phone at the job site and Klien responded aggressively. RP 312. He indicated that Klien said, "Get the fuck out of my face," and was within an inch of him. RP 313. Ili said he felt threatened because he was standing near a truck bumper and believed he could be pushed into it. RP 314. He reacted by grabbing Klien with one hand and putting him straight to the ground. RP 314. Ili testified that he grabbed Klien by the neck and held him down for a few seconds, "then let go." RP 315.

The jury found Ili guilty of assault in the second degree. RP 396, CP 58. Finding that an exceptional sentence was appropriate due to Ili's youth, the trial court imposed a term of incarceration of 1.5 months with the option of work release. CP 67-77, 78-79, 2 RP 12-15. This appeal follows.

C. ARGUMENT.

1. The trial court did not abuse its discretion by denying the defense motion to exclude juror number 29 for cause because the record does not support a conclusion that juror number 29 was implicitly or actually biased against Ili.

Both the United States Constitution and the Washington State Constitution provide a constitutional right to a trial by jury that is to be preserved and remain inviolate. U.S. Const. amend. VI; Wash. Const. art. I, § 22; State v. Boiko, 138 Wn. App. 256, 260, 156 P.3d 934 (2007). Bias, either actual or implied is a recognized basis for a challenge for cause. RCW 4.44.170; State v. Cho, 108 Wn. App. 315, 324, 30 P.3d 496 (2001). The civil jury selection statutes, RCW 4.44.150 through RCW 4.44.190 are applicable to challenges for cause in criminal cases. CrR 6.4(c)(2). A trial court is required to excuse from further jury service any juror who, in the opinion of the judge, has manifested unfitness by reason of bias or prejudice. RCW 2.36.110, State v. Moen, 4 Wn. App.2d 589, 596, 422 P.3d 930 (2018). A trial court's decision about whether to excuse a juror is reviewed for an abuse of discretion and will not constitute reversible error absent a manifest abuse of discretion. State v. Depaz, 165 Wn.2d 842, 852, 204 P.3d 217 (2009); State v. Noltie, 116 Wn.2d 831, 838, 809 P. 2d 190 (1991). Moen, 4 Wn.

App.2d at 596. “The question for the judge is whether the challenged juror can set aside preconceived ideas and try the case fairly and impartially.” Hough v. Stockbridge, 152 Wn. App. 328, 341, 216 P.3d 1077 (2009). “The trial court is in the best position for to determine a juror’s ability to be fair and impartial.” Noltie, 116 Wn.2d at 839-840. A reviewing court will defer to the judgment of the trial court, even if the record demonstrates a possibility of prejudice. Id. at 840.

Actual bias of a juror exists when the juror exhibits “a state of mind...in reference to the action, or to either party, which satisfies the court that the challenged person cannot try the issue impartially and without prejudice to the substantial rights of the party challenging.” State v. Guevara Diaz, 11 Wn. App.2d 843, 855, 456 P.3d 869 (2020); citing RCW 4.44.170(2). Actual bias must be established by proof. Noltie, 116 Wn.2d at 838.

A juror’s acquaintance with a witness is not, in itself, grounds for finding a juror unfit to serve. State v. Sassen Van Elsloo, 191 Wn.2d 798, 810-811, 425 P.3d 807 (2018); State v. Tingdale, 117 Wn.2d 595, 601, 817 P.2d 850 (1991); State v. Kloepper, 179 Wn. App. 343, 317 P.3d 1088 (2014). The challenging party must show that the juror formed an opinion because of his or her prior

acquaintance with the witness and that the juror cannot disregard that opinion and try the case impartially. Sassen Van Esloo, 191 Wn.2d at 811.

When a juror's responses on voir dire do not demonstrate an actual bias, "in exceptional cases the courts will draw a conclusive presumption of implied bias from the juror's factual circumstances." State v. Cho, 108 Wn. App. 315, 325, 30 P.3d 496 (2001). Implied bias is narrowly defined in RCW 4.44.180 and arises when a juror has some relationship with either party, with the case itself, or has served as a juror in the same or a related action. Implied bias is rarely found and exists in "extreme situations where the relationship between a prospective juror and some aspect of the litigation is such that it is highly unlikely that the average person could remain impartial in [their] deliberations under the circumstances." United States v. Kechedzian, 902 F.3d 1023, 1027 (9th Cir. 2018).

Ili argues that Juror 29 was actually and implicitly biased against the defense due to his service as a chaplain for the City of Lacey Police Department and his acquaintance with Officer Dave Maclurg. The trial court asked the entire juror panel, "Have any of you heard of this case before today?" and no juror responded. RP 20. In response to the trial court's question to the venire about

whether anyone knew Officer Dave Maclurg, Juror 29 responded, "I'm former law enforcement and current chaplain for Lacey Police Department." RP 22. Juror 29 subsequently disclosed that he was previously a reserve police officer for the City of Lacey, but it had been "almost five years" since he had been a reserve officer. RP 22, 53. The trial court then asked:

And if you were selected to serve as a juror in this case, would your current position and your prior position as it touches upon your familiarity with Officer Maclurg cause you to potentially give more weight to his testimony if he's called as a witness in this trial than another witness.

RP 22-23. Juror 29 unequivocally responded "no." RP 23.

Prior to any additional information from Juror 29 being elicited by questioning, the defense moved to excuse Juror 29 for cause based on his familiarity with Officer Maclurg and the depth of potential familiarity as the chaplain. RP 33. The trial court stated, "I'm going to for now deny the motion as to 29. It may be renewed after voir dire if we can have a discussion then." RP 34. Juror 29 unequivocally indicated that his familiarity with Officer Maclurg would not affect his judgment of Officer Maclurg's testimony as opposed to any other witness. No basis in the record supports a finding of actual prejudice.

In State v. Johnson, 42 Wn. App. 425, 429, 712 P.2d 301 (1985), this Court indicated that RCW 4.44.180 and CrR 6.4(c)(2) must be construed in light of their purpose. RCW 4.44.180(2) states that a challenge for implied bias may be taken if the juror stands in the relation of “master and servant,” or “in the employment for wages” or a party. Such a relationship requires that “there must be a substantial relationship between the interests the prospective juror has in his employment and the interest the government is advancing as a litigant.” Johnson, 42 Wn. App. at 429. Quoting United States v. Wood, 299 U.S. 123, 147-149, 81 L.Ed. 78, 57 S.Ct. 177 (1936), this Court stated:

Why should it be assumed that a juror, merely because of employment by the Government, would be biased against the accused? In criminal prosecutions the Government is acting simply as the instrument of the public in enforcing penal laws for the protection of society. In that enforcement all citizens are interested. It is difficult to see why a governmental employee, merely by virtue of his employment, is interested in that enforcement either more or less than any other good citizen is or should be...We think the imputation of bias simply by virtue of governmental employment, without regard to any actual partiality growing out of the nature and circumstances of particular cases, rests on an assumption without foundation.

Johnson, 42 Wn. App. at 429. This Court then held that it was not reasonable to expect that a juror employed by DSHS, personal and

financial interests in her employment could be affected by the success or failure of the prosecution. Id. at 430.

In this case, nothing in the record suggest that Juror 29's personal and financial interest could be affected by the success or failure of the prosecution of Mr. Ili. Juror 29 knew nothing about the facts of this case. RP 20. Further, nothing in the record demonstrates that Juror 29's service as a chaplain for the Lacey Police Department constituted employment for wages. He was not asked if he received compensation for that service, and in response to later questioning indicated that he was a "volunteer chaplain," though that response was not specific as to whether that included the Lacey Police Department. RP 71.

When defense counsel asked if "people ever exaggerate what happened to law enforcement," Juror 29 responded, "yeah, absolutely." When Juror 29 was asked about his prior jury service, he indicated:

I would say reaching a verdict was challenging because in the case I was on, the prosecution, law enforcement and stuff - - they didn't do a good enough job to bring something to say, hey, we can come to for a sure agreement here.

RP 66. He continued:

So the challenge was trying to get – because you have – so you start going through the evidence and realizing, as was stated, that this is somebody’s livelihood or something that’s at stake here, you know. So it makes it hard because it’s another person involved and we should care about. We’re all human beings and we care about them.

RP 66. The statements tend to indicate that Juror 29’s financial well being had nothing to do with the outcome of a particular case and that he was willing to hold law enforcement accountable for the quality of their investigation.

Ili cites to RCW 41.22.020 and RCW 41.22.040 in discussing the duties of a volunteer chaplain.² Law enforcement chaplains do serve an important function, “including counseling, stress management, and family life counseling,” for law enforcement officers. RCW 41.22.010. However, nothing inherent in those responsibilities indicates a personal or financial interest in the outcome of any particular case. RCW 41.22.030 authorizes “local law enforcement agencies to use the services of volunteer chaplains associated with an agency.” Nothing in the law or the record of this case supports the conclusion that such a position is in

² RCW 41.22.020 authorizes that Washington State Patrol and the Department of Fish and Wildlife to utilize volunteer chaplains.

a master and servant relationship or employment for a wage from the law enforcement agency that they provide chaplain services to.

Ili relies heavily on State v. Keeble, 380 Mont. 69, 353 P.3d 1175 (2014), for the proposition that a juror who works for a law enforcement agency should be excused. In that case, the investigation was conducted by the Department of Justice Division of Criminal Investigations (DOJ DCI) that had investigated the charges. Id. at 1178. The prospective juror at issue was employed as a “criminal investigator” for DOJ DCI. Id. The decision of the Montana Supreme Court relied heavily on the Montana statute governing for cause challenges, Section 46-16-115 MCA. The Court stated that the juror was clearly in the employment of the very department and division that was involved in the prosecution of the defendant. Id. at 1181. The situation in that case is distinguishable from the situation in this case. The interest in the outcome of proceedings is very different for a paid criminal investigator who works for an agency that investigated and brought forth charges than it is for a volunteer chaplain who provides counseling for law enforcement officers and had no knowledge of the facts of the case at issue.

Nothing in the record of this case supports a conclusion that Juror 29 was either actually or implicitly biased based on his service as a chaplain for the Lacey Police Department. The defense did not further question Juror 29 following the challenge for cause to further develop the record. This Court should defer to the decision of the trial court and affirm the decision.

2. The fact that the defense did not re-raise the challenge to Juror 29 is further indication that Juror 29's answers did not demonstrate actual or implicit bias.

In State v. Jahns, 61 Wash. 636, 638, 112 P. 747 (1911), our State Supreme Court considered whether a claim of bias was waived where it had been raised by the defense and denied, and later the State withdrew opposition to the challenge and the court offered to permit the defense to challenge the juror again, but declined to do so. Our State Supreme Court stated:

If the first ruling of the court was wrong, it was withdrawn for the benefit of defendant, and in refusing to take advantage of the court's ruling and interpose a challenge to the juror, and error in the first ruling was waived and cannot be taken advantage of.

Id. In this case, the trial court specifically ruled, "I'm going to for now deny the motion as to 29. It may be renewed after voir dire if we can have a discussion then." RP 34. The defense never again

challenged Juror 29 for cause. RP 34-94. At the end of general questioning, the trial court asked if either party had any motions and defense counsel challenged only juror number 18 for cause. RP 91-94.

Subsequent case law has distinguished the holding of Jahns. In State v. Guevara Diaz, Division I of this Court stated that “*Jahns* does not address a situation where an appellant failed to raise the issue below, so it does not hold that a failure to challenge a juror for actual bias results in a waiver.” 11 Wn. App.2d at 854. That Court concluded that “a challenge to a conviction based on a claim of juror bias established by the record involves an issue of manifest constitutional error.” Id.

Guevara-Diaz distinguished its facts from those in Jahns. However, the facts in this case are similar to the Jahns. As in Jahns, the trial court allowed the defense the opportunity to further argue whether the facts supported a finding that the juror was biased, and the defense elected not to do so. In this case, based on Juror 29’s answers to subsequent questions, which could be construed as evidencing an impartial state of mind, the failure to follow up with an additional objection may have been purposeful and strategic. RP 47-49, 52-53, 55-57, 65, 66, 70-71. The lack of a

further objection indicates that subsequent questioning of Juror 29 did not reveal a basis to conclude that actual or implied bias existed. As noted above, nothing in the record supports such a conclusion. This Court should defer to the decision of the trial court.

D. CONCLUSION.

Nothing in the record supports a conclusion that Juror 29 was actually or implicitly biased. The fact that he served as chaplain for the Lacey Police Department and knew Officer Maclurg does not equate to a personal or financial interest in the outcome of the proceeding. The trial court did not abuse its discretion by denying the challenge for cause of Juror 29.

Respectfully submitted this 2nd day of July, 2020.



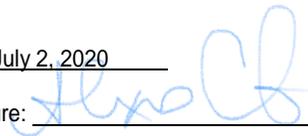
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I hereby certify that on the date indicated below I electronically filed the foregoing document with the Clerk of the Court of Appeals using the Appellate Courts' Portal utilized by the Washington State Court of Appeals, Division II, for Washington, which will provide service of this document to the attorneys of record.

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THURSTON COUNTY PROSECUTING ATTORNEY'S OFFICE

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