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Court of Appeals
Division II
State of Washington
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NO. 54228-5-II

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

STATE OF WASHINGTON,

Respondent,

v.

JASON CISSNER,

Appellant.

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

BRIEF OF APPELLANT

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TABLE OF CONTENTS

A. INTRODUCTION..... 1

B. ASSIGNMENTS OF ERROR 2

C. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR 2

D. STATEMENT OF THE CASE 3

E. ARGUMENT 6

 1. The evidence was insufficient to prove Ms. Rognlin’s breathing or blood flow was obstructed..... 6

 a. The State bears the burden of proving each element beyond a reasonable doubt. 6

 b. The evidence was insufficient to prove Mr. Cissner strangled Ms. Rognlin..... 7

 c. Mr. Cissner’s conviction for second-degree assault must be reversed with instructions to dismiss..... 10

 2. The prosecution did not prove the necessary evidence of Mr. Cissner’s criminal history to support the sentence. 11

 a. The court may not increase the punishment imposed without adequate proof. 11

 b. The prosecution did not prove the criminal history required to justify Mr. Cissner’s sentence. 13

 c. The court erred by including a 1986 felony in Mr. Cissner’s criminal history score. 15

 d. A new sentencing hearing is required..... 16

 3. Remand is necessary to strike the requirement that Mr. Cissner pay the costs of community custody..... 17

F. CONCLUSION 19

TABLE OF AUTHORITIES

United States Supreme Court

<i>In re Winship</i> , 397 U.S. 358, 90 S. Ct. 1068, 25 L. Ed. 2d 368 (1970)	6
<i>Jackson v. Virginia</i> , 443 U.S. 307, 99 S. Ct. 2781, 61 L. Ed. 2d 560 (1979)	6, 9, 10

Washington Supreme Court

<i>In re Heidari</i> , 174 Wn.2d 288, 274 P.3d 366 (2012)	11
<i>State v. Cate</i> , 194 Wn.2d 909, 453 P.3d 990 (2019)	12, 13, 14, 16
<i>State v. Hunley</i> , 175 Wn.2d 901, 287 P.3d 584 (2012)	11, 12, 13, 14, 15
<i>State v. Mendoza</i> , 165 Wn.2d 913, 205 P.3d 113 (2009)	12, 13, 15
<i>State v. Moeurn</i> , 170 Wn.2d 169, 240 P.3d 1158 (2010)	12
<i>State v. Ramirez</i> , 191 Wn.2d 732, 426 P.3d 714 (2018)	19
<i>State v. Vasquez</i> , 178 Wn.2d 1, 6, 309 P.3d 318 (2013)	6
<i>State v. Wilson</i> , 170 Wn.2d 682, 244 P.3d 950 (2010)	11

Washington Court of Appeals

<i>State v. Cate</i> , noted at 8 Wn. App. 2d 1036 (2019), <i>reversed by</i> 194 Wn.2d at 914	14
<i>State v. Cross</i> , 156 Wn. App. 568, 234 P.3d 288 (2010) ..	15, 16
<i>State v. Dillon</i> , 12 Wn. App. 2d 133, 456 P.3d 1199 (2020) ..	17
<i>State v. Huckins</i> , 5 Wn. App. 2d 457, 426 P.3d 797 (2018) ...	18

<i>State v. Ramirez</i> , 190 Wn. App. 731, 359 P.3d 929 (2015)	13
<i>State v. Reed</i> , 168 Wn. App. 553, 278 P.3d 203 (2012)	7
<i>State v. Rodriguez</i> , 187 Wn. App. 922, 352 P.3d 200 (2015)	9, 10
<i>State v. Shelley</i> , noted at 187 Wn. App. 1040 (2015).....	15
United States Constitution	
U.S. Const. amend. XIV	6, 11
Washington Constitution	
Const. art. I, § 3	6, 11
Washington Statutes	
RCW 10.01.160	17
RCW 10.99.080	18
RCW 36.18.020	18
RCW 7.68.035	18
RCW 9.94A.500.....	12
RCW 9.94A.525.....	11, 15, 16
RCW 9.94A.703.....	17
RCW 9.94A.760.....	18
RCW 9A.04.110.....	7
RCW 9A.36.021.....	7
Court Rules	
GR 14.1.....	14, 15

A. INTRODUCTION

Jason Cissner and April Rognlin were in a relationship for several years. One morning, a neighbor called the police when she believed she saw Mr. Cissner with either one or two hands on Ms. Rognlin's neck.

Mr. Cissner was charged with second-degree assault. While the State alleged he committed the crime by strangling Ms. Rognlin, State did not present evidence to establish that alternative. The trial court noted the evidence was weak, stating the "jury could easily conclude that it's an assault four." Yet the jury convicted Mr. Cissner of second-degree assault. Because the State presented insufficient evidence, reversal of the assault conviction is required.

If this Court does not reverse the conviction, it must reverse the sentence. The prosecutor failed to prove Mr. Cissner's alleged criminal history or prove a 1986 conviction had not washed out. The trial court imposed supervision costs despite Mr. Cissner's indigence. A new sentencing hearing is required.

B. ASSIGNMENTS OF ERROR

1. The evidence was insufficient to convict Mr. Cissner of second-degree assaults.

2. The prosecution did not meet its burden of proof at sentencing as required by due process.

3. The trial court erred in ordering that Mr. Cissner pay supervision fees as a term of community custody.

C. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR

1. Due process requires the State prove each of the elements of the charged offense. As charged, second-degree assault requires proof that the defendant obstructed the victim's airflow or blood flow or acted with the intent to obstruct the airflow or blood flow. The evidence presented showed that Mr. Cissner put a hand or hands on Ms. Rognlin's neck, and may have caused redness, but did not establish he obstructed her airflow or blood flow or that he intended to do so. Is Mr. Cissner entitled to reversal of the second-degree assault conviction with instructions to dismiss?

2. The court may not increase a person's sentence unless the prosecution has proven the factual basis for this sentence. The State alleged that Mr. Cissner's score was seven but offered no evidence to prove the alleged prior convictions or rebut the presumption that an alleged conviction from 1986 had washed out. The court sentenced Mr. Cissner as if a score of seven had been proven. Did the court improperly sentence Mr. Cissner without adequate proof?

3. As part of community custody, a trial court may waive the requirement that the defendant pay supervision fees. Supervision fees are discretionary "costs." Indigent people may not be sentenced to pay costs. Mr. Cissner is indigent and the trial court intended to impose only mandatory legal financial obligations, yet required Mr. Cissner to pay supervision fees. Did the court err?

D. STATEMENT OF THE CASE

Jason Cissner was charged with second-degree assault. CP 17. Mr. Cissner had put a hand on Ms. Rognlin's neck, and

later an arm around her neck, in his effort to pull her back into the house. 10/22-RP 65-66, 78.¹

Ms. Rognlin did not testify that Mr. Cissner squeezed or compressed her neck. She and another witness both seemed unsure whether Mr. Cissner had one hand or two hands on Ms. Rognlin's neck. 10/22-RP 65-66, 78. Ms. Rognlin stated she was "confined and choked or whatever and drug [toward] the house." Ms. Rognlin was left with "red marks" on her neck. 10/22-RP 54, 78.

After Ms. Rognlin described the incident, the prosecutor pressed her for more, leading her, "Was there ever any difficulty breathing?" 10/22-RP 78. As Ms. Rognlin began to respond, with "Yeah, it was --," the prosecutor interrupted her. *Id.* This interruption changed the subject away from obstruction of breath. *Id.* Ms. Rognlin never explained at what point in breathing was more difficult or what caused it.

¹ There are two non-sequentially paginated volumes for 10/22/19 in the VRP. This brief cites only to the transcript prepared by Brenda F. Johnston, which contains the trial.

The trial court instructed the jury on the lesser-included crime of assault in the fourth degree. 10/22-RP 86-87; CP 21-22 (instructions nos. 9-11). It found this to be appropriate because the “jury could easily conclude that it’s an assault four instead of an assault two,” given Ms. Rognlin’s “so-so testimony ... regarding ... whether or not she actually suffered a substantial impairment of bodily function or breathing.” 10/22-RP 87.

After deliberations, the jury found Mr. Cissner guilty of assault in the second degree. CP 24.

At sentencing, the prosecutor asserted Mr. Cissner had a criminal history score of seven. *See* 11/01-RP 3; CP 28. The State did not provide any documentation to prove any prior convictions. 11/01-RP 3. The State did not prove a conviction from 1986 could be included in Mr. Cissner’s score. *See* 11/01-RP 3. Nonetheless, the trial court sentenced Mr. Cissner to a term of confinement based on a score of seven. CP 28-30.

Mr. Cissner is indigent. CP 29, 41-42; Supp. CP ____ (sub no. 4). Accordingly, the trial court waived all

discretionary legal financial obligations [LFOs] listed in the LFO section of the judgment and sentence. CP 32-33. But a boilerplate provision ordering community custody supervisory fees remained in the middle of a paragraph in a section apart from the LFOs section. CP 31.

E. ARGUMENT

1. The evidence was insufficient to prove Ms. Rognlin's breathing or blood flow was obstructed.

a. The State bears the burden of proving each element beyond a reasonable doubt.

The State is required to prove every element of the charged offense beyond a reasonable doubt. U.S. Const. amend. XIV; Const. art. I, § 3; *In re Winship*, 397 U.S. 358, 364, 90 S. Ct. 1068, 25 L. Ed. 2d 368 (1970). A reviewing court must reverse unless it concludes, viewing the evidence in the light most favorable to the prosecution, that every rational fact finder could have found each essential element beyond a reasonable doubt. *Jackson v. Virginia*, 443 U.S. 307, 318-19, 99 S. Ct. 2781, 61 L. Ed. 2d 560 (1979); *State v. Vasquez*, 178 Wn.2d 1, 6, 309 P.3d 318 (2013).

b. The evidence was insufficient to prove Mr. Cissner strangled Ms. Rognlin.

The State charged Mr. Cissner with assault under the alternative of strangulation. CP 17; *see* RCW 9A.36.021(1)(g). “Strangulation” means “to compress a person’s neck, thereby obstructing the person’s blood flow or ability to breathe, or doing so with the intent to obstruct the person’s blood flow or ability to breathe.” RCW 9A.04.110(26).

Thus, in order to convict Mr. Cissner, the State was required to prove beyond a reasonable doubt that he intentionally assaulted Ms. Rognlin by either obstructing her blood flow or ability to breathe by compressing her neck or that he compressed Ms. Rognlin’s neck with the specific intent to cause this result. *State v. Reed*, 168 Wn. App. 553, 574-75, 278 P.3d 203 (2012).

Here, while witnesses testified Mr. Cissner put a hand on Ms. Rognlin’s neck, or an arm around it, no one testified her neck was compressed or that her breathing or blood flow was obstructed as a result. Ms. Rognlin had some “red marks” on or near her throat immediately after the incident, but no

evidence showed swelling, damage to blood vessels, or bruising on her neck or jaw. 10/22-RP 54. The State offered no medical testimony. Thus, no one could explain whether the “red marks” on Ms. Rognlin’s neck constituted bruising or were a sign of strangulation. *Id.*

The prosecutor argued, “You heard Ms. Rognlin testify that her ability to breathe was affected by” Mr. Cissner’s hand or arm on her neck. 10/22-RP 94. But Ms. Rognlin did not testify to this. The prosecutor had asked her, without specifying a specific point in the interaction, if she ever had had any “difficulty breathing.” 10/22-RP 78. Ms. Rognlin began to respond, with “Yeah, it was --” but the prosecutor cut her off, possibly to prevent her from clarifying what she meant, or explaining whether that was from Mr. Cissner’s actions, being out of breath from running, or anything else. *Id.* The prosecutor had interrupted her to ask a different question, and the testimony never returned to the proof of obstruction required for strangulation. *Id.*

Further, the evidence does not show Mr. Cissner had the specific intent to obstruct Ms. Rognlin's airflow or blood flow. Rather, both Ms. Rognlin and an eyewitness testified Mr. Cissner's apparent intent in touching Ms. Rognlin was to bring her back into the house. 10/22-RP 65-66, 78. He made no statements of wanting to harm her, but rather tried to pull her toward the door. *Id.*

A mere "modicum of evidence" on an essential element is "simply inadequate" to "rationally support a conviction beyond a reasonable doubt." *Jackson*, 443 U.S. at 320.

Instead, cases finding sufficient evidence of strangulation have rested on far more evidence than this. For instance, in *State v. Rodriguez*, the victim had permanent scars on her neck, darkness around her trachea indicating "grabbing," and swelling on her neck and her jaw line. 187 Wn. App. 922, 928, 936, 352 P.3d 200 (2015). The victim specifically testified she could "not really" breathe during the assault, and the evidence showed she had "difficulty breathing ... for minutes afterward." *Id.* at 926, 935.

Additionally, in *Rodriguez*, the Court also found statements that he was going to “kick [her] ass” and telling her, “I’m going to fuck you up, bitch,” established the defendant’s intent to obstruct the victim’s breathing or blood flow. *Id.* at 926, 936 n.4.

Mr. Cissner did not cause harm like that in *Rodriguez*. *See* 187 Wn. App. at 926-28, 935-36, 936 n.4.

The trial court recognized the weakness of the evidence, describing it as “kind of so-so testimony from [Ms.] Rognlin regarding specifically the strangulation issue, and whether or not she actually suffered a substantial impairment of bodily function or breathing.” 10/22/19 RP 87 (emphasis added). Indeed, this “so-so” evidence was insufficient as a matter of law to prove strangulation, an essential element of assault in the second degree. *See Jackson*, 443 U.S. at 319, 320.

c. Mr. Cissner’s conviction for second-degree assault must be reversed with instructions to dismiss.

Since there was insufficient evidence to support the conviction, this Court must reverse the conviction with instructions to dismiss the charge of second-degree assault.

Because the jury was instructed on the lesser offense of fourth-degree assault, the court may enter a conviction on that crime. *See In re Heidari*, 174 Wn.2d 288, 391-294, 274 P.3d 366 (2012).

2. The prosecution did not prove the necessary evidence of Mr. Cissner’s criminal history to support the sentence.

a. The court may not increase the punishment imposed without adequate proof.

A court may only impose a sentence that is authorized by statute and rests on adequate proof justifying its length. *State v. Hunley*, 175 Wn.2d 901, 915, 287 P.3d 584 (2012); U.S. Const. amend. XIV; Const. art. I, § 3. “[A] defendant cannot waive a challenge to a miscalculated offender score.” *State v. Wilson*, 170 Wn.2d 682, 688, 244 P.3d 950 (2010). A sentence “based on an improperly calculated score lack[s] statutory authority” and “cannot stand.” *Id.*

In broad terms, when a court determines the authorized sentence under RCW 9.94A.525, it must “(1) identify all prior convictions; (2) eliminate those that wash out; and (3) ‘count’ the prior convictions that remain in order

to arrive at an offender score.” *State v. Moeurn*, 170 Wn.2d 169, 175, 240 P.3d 1158 (2010).

RCW 9.94A.500(1) requires the court to “specify the convictions it has found to exist,” based on the evidence presented, and make this information “part of the record.” The court must also determine the prior convictions have been proven by a preponderance of evidence before it is authorized to impose a sentence based on that history. *Id.*

“It is the obligation of the State, not the defendant, to assure that the record before the sentencing court supports the criminal history determination.” *State v. Mendoza*, 165 Wn.2d 913, 920, 205 P.3d 113 (2009). A certified copy of a judgment is the “best evidence of a prior conviction” at sentencing. *Id.*

The prosecution does not satisfy its burden of proving the defendant’s prior convictions by offering an “unsupported summary of criminal history.” *State v. Cate*, 194 Wn.2d 909, 913, 453 P.3d 990 (2019); *Hunley*, 175 Wn.2d at 910. It “violates due process” to rest a sentence on “the prosecutor’s

bare assertions” about prior convictions and to treat a defendant’s failure to object to the prosecution’s assertions as adequate proof of criminal history. *Hunley*, 175 Wn.2d at 915.

The prosecution is not relieved of its burden of proving prior convictions unless the defendant “affirmatively acknowledges” the “facts and information” of the underlying criminal history. *Hunley*, 175 Wn.2d at 912; *Mendoza*, 165 Wn.2d at 928; *see Cate*, 194 Wn.2d at 914. Acknowledging the criminal history score is not an affirmative acknowledgment of the facts and information regarding criminal history. *State v. Ramirez*, 190 Wn. App. 731, 734, 359 P.3d 929 (2015).

b. The prosecution did not prove the criminal history required to justify Mr. Cissner’s sentence.

In *Cate*, the Supreme Court reversed the sentence because the prosecution had not produced evidence of all prior convictions necessary to prove the criminal history score the court used. *Cate*, 194 Wn.2d at 914. The defendant had “directly admitted” two of his prior convictions while testifying, but had not done so for the other convictions the prosecution alleged. *Id.* The State had only filed briefing that

included the cause numbers and details of two recent cases and information about the defendant's criminal history "from NCIC." *See State v. Cate*, noted at 8 Wn. App. 2d 1036 (2019), *reversed by* 194 Wn.2d at 914 (details of sentencing argument contained in Court of Appeals opinion, which is unpublished and cited pursuant to GR 14.1). The defense had agreed that the same offender score controlled and asked for a sentence consistent with same offender score alleged by the State. *Id.*

The prosecution alleged Mr. Cissner had numerous prior convictions, including three felonies, four misdemeanors with domestic violence designations, and six other misdemeanors. 11/01-RP 3; CP 27-28. It contended these prior convictions justified a score of seven and a sentencing range of 43 months to 57 months. 11/01-RP 3; CP 28.

Yet, the prosecution did not offer a certified copy of the judgement and sentences or any documents proving these prior convictions. *See* 11/01-RP 3. A summary allegation is insufficient to meet the prosecution's burden of proof. *Cate*, 194 Wn.2d at 913-14; *Hunley*, 175 Wn.2d at 913; *Mendoza*,

165 Wn.2d at 925. Mr. Cissner did not relieve the prosecution of its burden. *See Hunley*, 175 Wn.2d at 912.

The State failed to meet its burden to prove the prior convictions in this case.

c. The court erred by including a 1986 felony in Mr. Cissner's criminal history score.

Prior convictions “wash out” and do not count in a person’s score if the person has spent the requisite amount of time in the community without committing another crime that results in a conviction. RCW 9.94A.525(2)(b). For class B felony convictions, the washout period is ten years. *Id.*

The prosecution’s burden to prove a person’s criminal history by a preponderance of the evidence includes proving a prior offense may be included in the score. *State v. Cross*, 156 Wn. App. 568, 586-87, 234 P.3d 288 (2010); *State v. Shelley*, noted at 187 Wn. App. 1040 (2015) (unpublished; cited pursuant to GR 14.1).

It is unclear which alleged prior convictions the court relied on to compute a score of seven. It appears the court scored one point each for convictions of assault in the third

degree, trafficking in stolen property, and three counts of misdemeanor harassment, as well as two points for a 1986 conviction of assault in the second degree. *See* RCW 9.94A.525(8, 21); CP 27-28.

According to the court's finding of criminal history, following Mr. Cissner's 1986 assault conviction, he had a nearly eleven-year crime-free period between March 20, 1999 and January 16, 2010. CP 27-28. Because the court did not find Mr. Cissner had any criminal offense for a the nearly 11 year period following the 1986 conviction, that offense cannot be include in the score. CP 27-28; *see Cross*, 156 Wn. App. at 586-87. Accordingly, the court miscalculated the score.

d. A new sentencing hearing is required.

The State failed to prove the existence of prior convictions. The court erroneously included a washed out offense in its scoring calculation. The remedy is reversal of the sentence and remand for resentencing. *Id.* at 915; *Cate*, 194 Wn.2d at 913.

3. Remand is necessary to strike the requirement that Mr. Cissner pay the costs of community custody.

Mr. Cissner is indigent. CP 29, 41-42; Supp. CP ____ (sub no. 4). Although the trial court appears to have intended to waive all discretionary legal financial obligations [LFOs], the judgment and sentence ordered that Mr. Cissner “pay supervision fees as determined by [the Department of Corrections]” as community custody condition. CP 31-33.

The relevant statute provides these fees are discretionary: “[u]nless waived ... the court shall order an offender to ... [p]ay supervision fees as determined by the department.” RCW 9.94A.703(2)(d) (emphasis added). As they are waivable, community custody costs are discretionary.

State v. Dillon, 12 Wn. App. 2d 133, 152, 456 P.3d 1199 (2020) (citing *State v. Lundstrom*, 6 Wn. App. 2d 388, 396 n.3, 429 P.3d 1116 (2018)).

The Legislature has determined that people indigent at the time of sentencing should not pay costs. RCW 10.01.160(3). Community custody “supervisory fees” are

“costs.” *Lundstrom*, 6 Wn. App. 2d at 396 n.3; *State v. Huckins*, 5 Wn. App. 2d 457, 469, 426 P.3d 797 (2018).

Here, under the judgment and sentence’s section on LFOs, the trial court only imposed the mandatory \$500 penalty assessment. CP 32-33; *see* RCW 7.68.035. The court declined to impose every listed discretionary LFO, such as the criminal filing fee, the domestic violence assessment, and public defender costs. *See* RCW 36.18.020(2)(h); RCW 10.99.080(1); RCW 9.94A.760.

In the judgment and sentence’s section on LFOs, there is no option to order or waive the payment of supervision fees. CP 32-33. Under the order’s provisions for community custody conditions, the requirement that Mr. Cissner “pay supervision fees as determined by DOC” is buried in a long paragraph containing nine conditions. CP 31. Given the orders in the section on LFOs, the trial court intended to waive all discretionary LFOs, but inadvertently imposed supervision fees because of their location in the judgment and sentence. *See* CP 31-33; *Dillon*, 456 P.3d at 1209.

As the trial court intended to waive discretionary costs and fees, and Mr. Cissner is indigent, this Court should strike the supervision fee requirement. CP 29, 41-42; *see State v. Ramirez*, 191 Wn.2d 732, 742-46, 426 P.3d 714 (2018); *Dillon*, 456 P.3d at 1209.

F. CONCLUSION

Because the evidence was insufficient, Mr. Cissner asks this Court to reverse his conviction for second-degree assault and remand with instructions to dismiss the charge and enter a conviction on the lesser offense of fourth-degree assault. Alternatively, a new sentencing hearing should be ordered.

Submitted this 17th day of July 2020.



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

STATE OF WASHINGTON,)	
)	
RESPONDENT,)	
)	
v.)	NO. 54228-5-II
)	
JASON CISSNER,)	
)	
APPELLANT.)	

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