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Division III
State of Washington
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NO. 34761-3-III

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

DIVISION THREE

STATE OF WASHINGTON,

Respondent,

v.

JOSE ABILIO AGUILAR AGUILAR,

Appellant.

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

APPELLANT'S REPLY BRIEF

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A. ARGUMENT.

1. The prosecution lacks sufficient evidence of first degree murder when its proof of premeditated deliberation rests on sheer speculation.

As explained in Mr. Aguilar's opening brief, the prosecution lacks evidence demonstrating planning or purposeful premeditated deliberation, a key element of first degree murder.

The prosecution had no eyewitnesses describing Mr. Aguilar's behavior during or before the incident. It had no statement from Mr. Aguilar explaining premeditated intent. While Ms. Lopez had a number of bullet wounds, most shots hit Ms. Lopez after she died, none were fired at close range, and she died very quickly, potentially within seconds. RP 1946, 1996, 1998. Ms. Lopez had never even mentioned Mr. Aguilar to anyone, indicating they did not have a serious relationship, and in fact, another man said he seriously dated Ms. Lopez and they had set a date to be married. 4/6/16RP 1615; 4/8/16RP 1939. Even Jose Galban, Mr. Aguilar's roommate who testified for the prosecution in exchange for the ability to obtain immigration relief as a crime victim, said the incident occurred during an argument, demonstrating an unplanned and undeliberate event. RP 2849, 2902.

Bringing a gun to a designated and popular hunting area is hardly evidence of premeditated intent; it was a hunter who found Ms. Lopez and he was also presumably armed during his daily hunting expedition. 4/1/16RP 1009.

Shooting someone during an argument or spontaneous confrontation may be an intentional shooting, but it lacks the necessary proof of deliberation to prove premeditated intent. *State v. Bingham*, 105 Wn.2d 820, 826, 719 P.2d 109 (1986) (unplanned or impulsive killing insufficient for premeditation).

Criminal liability may not rest on speculation and conjecture. *State v. Vasquez*, 178 Wn.2d 1, 7, 309 P.3d 318 (2013). When the prosecution does not prove some affirmative evidence that jurors may use to find premeditated intent, this greater offense has not been sufficiently established. *State v. Hummel*, 196 Wn. App. 329, 354, 383 P.2d 592 (2016).

2. The State's mismanagement of the evidence and charges without good cause triggered delay for almost four years and this mismanagement forced Mr. Aguilar to choose between a speedy trial or prepared counsel.

The prosecution mismanaged its case because it possessed the evidence used to prosecute Mr. Aguilar from the inception of the case

but kept altering what offenses it would charge, waited until the last minute to do forensic tests on bloody items, and repeatedly delivered significant discovery late. This behavior left Mr. Aguilar's attorney with no choice but to seek more time to prepare for trial and resulted in unfair trial delay to Mr. Aguilar, who waited in jail for close to four years due to the State's mismanagement.

CrR 8.3 requires sanction for the government's "simple mismanagement," without bad faith, resulting prejudice that includes delaying the trial beyond what would otherwise be the mandatory date under CrR 3.3. *State v. Sulgrove*, 19 Wn. App. 860, 863, 578 P.2d 74 (1978). Mr. Aguilar sought sanctions less than dismissal, such as precluding late amendments to the information or barring evidence from admission so the trial could proceed but the court rejected these lesser sanctions, which results in the State's mismanagement violating Mr. Aguilar's right to a speedy trial. *State v. Michielli*, 132 Wn.2d 229, 937 P.2d 587 (1997) (late amendment that delays defense's readiness for trial constitutes mismanagement under CrR 8.3 (d)); *State v. Brooks*, 149 Wn.App. 373, 387, 203 P.3d 397 (2009) (delayed discovery prevents defense's timely preparation, constituting mismanagement under CrR 8.3).

Most of the prosecution's citations involve constitutional speedy trial cases, which are not dispositive. An accused person is separately entitled to both effective assistance of counsel and a speedy trial under CrR 3.3; the State cannot force a person to choose between these rights. *Brooks*, 149 Wn. App. at 387, citing *State v. Price*, 94 Wn.2d 810, 814, 620 P.2d 994 (1980). When the prosecution causes a series of delays, such as inexcusably failing to provide discovery, it may prejudice one or both of these rights. *Price*, 94 Wn.2d at 814; *see Brooks*, 149 Wn. App. at 388 (State's long delay in providing a "substantial amount" of important discovery actually prejudiced defendant).

a. Discovery delays.

CrR 4.7(a) directs the prosecution to complete discovery by the omnibus hearing for information within its knowledge, possession, or control. By the June 25, 2013 omnibus hearing, the defense completed most interviews and believed it was largely ready to litigate pretrial evidentiary issues and begin the trial. 1RP 38-40. The prosecution claimed discovery was complete at this time, then "found" more materials in an evidence locker. CP 36-39; 1RP 56.

This pattern repeated throughout the proceedings. On July 16, 2013, the court asked the prosecution why it did not just turn over everything. 1RP 52. But almost every continuance involved the defense explaining the prosecution had yet again given it more discovery that necessitated unexpected investigation. For example, it happened on July 16, 2013; November 21, 2013 (“significant recent discovery” received in past two weeks, 11/16/13RP 38); August 17, 2015 (defense complains of “critical” discovery and “new allegations” just received, 4RP 518); October 20, 2015 (defense complains of “new discovery [received] today, “brand new stuff that we’re going to have to digest,” 4RP 703, as well as outstanding discovery not yet provided); December 15, 2015 (“significant” discovery just received). *See also* 2RP 280 (prosecution claims “all of the known discovery” given to the defense); 3RP 346 (prosecution provides more discovery to defense). These discovery delays occurred long after the court announced a discovery deadline and the State claimed it complied. CP 1140-41.

The prosecution never explained that this belatedly provided information was not available earlier. In fact, evidence collected at the scene was available for forensic testing and discovery from the inception of the case, such as the bloody clothes Mr. Aguilar was

accused of wearing at the time of incident, but the prosecution did not obtain DNA tests on these clothes for three more years, after multiple trial delays. *See* 1RP 11 (witness accuses Mr. Aguilar accused of wearing bloody clothes, known to State by at least March 2013); 5RP 720-21 (evidence belatedly sent for DNA testing in 2015 available from start, in 2012).

Even though the State possessed the evidence it would use to seek a conviction and understood the nature of the incident, it kept finding significant discovery that should have been provided or obtained earlier, requiring the defense to need more time and violating Mr. Aguilar's right to a speedy trial. *Brooks*, 149 Wn. App. at 388.

b. Unexplained, significant charging changes.

The prosecution amended the charges five times and these amendments altered the factual predicates of the allegations and the sentencing consequences of conviction. An accurate charging document is essential to satisfying the constitutional right to be fairly informed of the charges at trial. *State v. Kjorsvik*, 117 Wn.2d 93, 97, 812 P.2d 86 (1991). Late amendments that could have been brought earlier and result in trial delay speedy trial deadlines of CrR 3.3 constitutes

prejudicial mismanagement under CrR 8.3. *Michielli*, 132 Wn.2d at 245.

Originally, the prosecution charged Mr. Aguilar with first degree murder. CP 1. At the omnibus hearing, it “shocked” the defense by announcing it would add aggravated first degree murder, which requires a life sentence without the possibility of parole, and could trigger the death penalty if sought by the State. 1RP 39; CP 42-43. The new charges included seemingly inapplicable “aggravating circumstances,” such as first or second degree robbery, rape, and burglary; residential burglary; kidnapping in the first degree; or arson in the first degree, none of which had been previously alleged. CP 43. It also added a new count of felony murder, based on committing first or second degree kidnapping, and added aggravating factors of deliberate cruelty and lack of remorse.

The prosecution promised this would be its “last motion to amend prior to trial” but it filed more amendments over the next two years, shifting the nature of the charges and resulting punishment. 1RP 55-56. For example, another amended charging document added drive-by shooting as a further basis for aggravated first degree murder. CP 259.

This kitchen sink approach to belated charging triggered necessary delay, as Mr. Aguilar had to investigate a whole new set of allegations. *See, e.g., State v. Estes*, 188 Wn.2d 450, 460, 395 P.3d 1045 (2017) (defense counsel’s failure to investigate consequences of deadly weapon enhancements objectively unreasonable under Sixth Amendment).

The amendments introduced new theories of liability, which must be researched, factually and legally, and consequently delayed Mr. Aguilar’s right to prepared trial counsel. *State v. Jones*, 183 Wn.2d 327, 339-40, 352 P.3d 776 (2015) (counsel “must investigate the case” including interviewing witnesses to make “informed” decisions about case). Mr. Aguilar objected based on the lack of factual basis for the added charges, as well as the governmental mismanagement evident by the late amendments. 6RP 770-71, 776.

New charges necessarily require the defense attorney to conduct whatever investigation is needed to contest them. By repeatedly altering the charges against Mr. Aguilar, the prosecution necessarily delayed the trial. By failing to ever give any reason for numerous alterations, and no apparent reason exists, the prosecution simply mismanaged the case.

c. Sloppy and incorrect charging documents.

In the middle of trial, nearly four years after charging Mr. Aguilar and after numerous amendments to the charges, the prosecution altered the dates of the incidents of murder and the separate assault and threats to Mr. Galban, shifting the order in which these incidents occurred in an amended information. RP 2405-07; CP 895-98. Mr. Aguilar objected. RP 2407-10, 2514-16, 2613.

By the time trial started, Mr. Aguilar justifiably relied on the charging document. Given the frequent adjustments the prosecution made to the charges, its claim that no more alterations would occur, and the sheer amount of time the prosecution had devoted to prosecuting the case, it is inconceivable for the defense to expect further changes in the charging document. These changes demonstrate mismanagement, prejudicing Mr. Aguilar's ability to prepare a defense when confronting this moving target of charges, undermining his rights to fair notice of the allegations and effective assistance of counsel.

d. Faulty or incomplete investigation delays.

Although the court announced a discovery deadline of July 2013, the prosecution never complied and never explained why it could not have complied. CP 1140. Mr. Aguilar had to continually confront

shifting witness statements and forensic evidence. Mr. Aguilar sought numerous extensions of time because of the State's inability to comply with its discovery obligations.

The State's blame for delays are evident in late 2014 through 2016. On September 14, 2015, the parties agreed everything was fully prepared and trial should begin January 5, 2015, CP 1145, but a change in trial prosecutor resulted in more than one year of further delay. 5TP 731. This significant delay is inexplicable since the same investigators could guide the presentation of evidence even if a new prosecutor would be offering it. Again, in September and October 2015, the case was set as a firm, ready trial date but the prosecution took evidence long in its possession and submitted it for DNA tests, causing another six months of delay. 4RP 543, 688. The evidence was not new, but the State failed to timely test it. These delays rested on the prosecution's lack of preparation; the defense was simply responding to a new set of information offered very late in the process.

e. Because the court did not order a lesser sanction to allow for a timely trial, reversal is now required.

The government's mismanagement caused the defense (and the prosecution) to request continuances from July 2013 through March

2016. This delay was directly caused by the government's mismanagement. At its root were the shifting allegations and evidence the State would present, as well as the prosecution's sloppy preparation. CrR 4.7 demands a forthright discovery process by the State. CrR 3.3 requires 60 days for trial absent valid continuance requests that do not prejudice the accused person. CrR 8.3 directs dismissal when the prosecution's mismanagement results in unnecessary trial delay. The mismanagement that occurred here forced Mr. Aguilar to choose between a speedy trial and an effective attorney, which violates CrR 8.3 and requires dismissal.

3. The cumulative harmful effect of improper arguments, questioning, and insertion of prejudicial information denied Mr. Aguilar a fair trial.

In addition to the mismanagement of discovery, investigation, and charging that triggered substantial delay and forced Mr. Aguilar to choose between having a prepared attorney and receiving a speedy trial, the prosecution engaged in several improper tactics to sway the jurors to convict him for reasons such as bias, prejudice, or trust in the prestige of the prosecutor's office.

The prosecution may not urge a conviction based on personal beliefs or by telling jurors of its confidence in the veracity or credibility

of its witnesses. For example, it may not tell jurors, we “believe that the defendant is guilty.” *United States v. Morris*, 568 F.2d 396, 402 (5th Cir. 1978). Here, the prosecutor said several times that it believed certain evidence was true, over objection. *See, e.g.*, 4/19/16RP 3323 (“we believe [these things] that are beyond reproach”); *Id.* at 3333 (“the state believes” referring to “one thing that will – that corroborates Mr. Galban’s version”); *Id.* at 3343 (“I was most interested in” evidence involving Ms. Lopez and her boyfriend Jose Reyes, “”which I think – which the state believes gives credence and more credibility” to its case); *Id.* at 3346-47 (repeating “we believe” each element is proved and “We believe the defendant is guilty”); *Id.* at 3350 (“I believe the evidence is clear about that.”).

The prosecution has a unique role in the courtroom and the fairness of the proceedings requires the prosecution to respect this role. *State v. Monday*, 171 Wn.2d 667, 676, 257 P.3d 551 (2011). Only the prosecution is a quasi-judicial officer. *State v. Reeder*, 46 Wn.2d 888, 892, 285 P.2d 884 (1955). Only it is charged with ensuring the defendant’s fair trial. *State v. Boehing*, 127 Wn. App. 511, 517, 111 P.3d 899 (2005). Only its closing argument “represent[s] the state” and “throw[s] the prestige of his public office . . . into the scales against the

accused.” *Monday*, 171 Wn.2d at 677, quoting *State v. Case*, 49 Wn.2d 66, 71, 298 P.2d 500 (1956); *see also United States v. Bess*, 593 F.2d 749, 755 (6th Cir. 2000) (prosecution “carries a special aura of legitimacy” as a representative of the State).

The prosecution improperly vouched for and bolstered its case by injecting its own opinions and the prestige of its office behind its belief that “we know” and “we believe” Mr. Aguilar is guilty.

It similarly injected its own personal veracity into the case during jury voir dire. The prosecution concedes it would be improper for it to tell potential jurors they needed to trust “what I tell you” to be qualified to serve. Resp. Brief at 45. But it contends that the prosecutor’s remarks were not improper because he also asked if jurors trusted others in the courtroom, such as the defense and judge. *Id.*; *see* 3/16/16RP 799-800. This spin on events is not how the remarks were presented or how jurors understood them at the time.

The responding jurors took the remarks personally, and some asked if this was unfair to the defendant. RP 800. The prosecutor responded by talking about himself, saying he would be concerned if a juror “felt like I was just lying to them and everything I was stating” was nonsense. RP 803. Another juror asked about whether the

prosecutor's job was to persuade them to "believe what you have to say" and the prosecutor again referred to himself, saying his job and his responsibility is to represent the state of Washington, against Mr. Aguilar. RP 804.

The prosecutor's injection of jurors' trust for his personal veracity into juror qualifications was inappropriate and the defense objected as the prosecutor got more afield of permissible voir dire conversations. RP 805-06. The prejudicial effect of these remarks is apparent when coupled with the self-referential vouching for what "I" or "we" believe during the State's closing argument.

Additionally, in its opening statement the prosecution now concedes it would be improper to speculate about the thoughts and intent of others when this evidence would not be presented at trial. Resp. Brief at 46-47. It denies this impropriety occurred, claiming the opening statement only recounted what the evidence would show.

But the prosecutor pretended jurors were omniscient observers and described what Mr. Aguilar was thinking when committing the offense. It insisted that Mr. Aguilar "decides" to "make sure the deal is done" and decides to hide Ms. Lopez and repeatedly shoot her. 4/1/16RP 954-57.

The prosecution's opening statement impermissibly fabricated an imaginary scenario involving Mr. Aguilar's state of mind that is improper. Pierce. It also fabricated the evidence it expected to offer. It had no evidence that a man got of the car visibly brandishing a gun and that he and the woman were yelling at each other in Spanish. It had no evidence that the jurors/observers would not understand what they were saying because they did not speak Spanish. It had no evidence about the manner in which the man left the scene. Yet it started its opening statement by pretending it could and would offer this information at trial.

This introduction to the case is likely to stay with jurors in their long term memory, as social scientists recognize under the doctrine of primacy and recency. *See* Mark Spottswood, Ordering Proof: Beyond Adversarial and Inquisitorial Trial Structures, 83 *Tenn. L. Rev.* 291, 294 (2015) (due to primacy and recency effects, "we should expect judges and juries to tilt their decisions subtly in favor of whomever gets the first word in court"). The harmful effect of misconduct in opening statement cannot be disregarded as merely something that happened at the very start of the case, as it is likely to stay with the jury throughout the proceedings as an indelible first impression.

Further harm comes from the prosecution's use of Mr. Aguilar's immigration and citizenship status despite its foreknowledge that it would not be able to prove its allegation that Mr. Aguilar failed to register a weapon as an alien. Illegal immigration is a subject fraught with prejudicial impact and triggers known and subconscious biases. *See Salas v. Hi-Tech Erectors*, 168 Wn.2d 664, 672, 230 P.3d 583 (2010) (evidence of immigration status can "carry a significant danger of interfering with the fact finder's duty to engage in reasoned deliberation."). Due to fear of inherent prejudice undermining the fairness of the fact finding process, the Supreme Court adopted a rule of evidence barring admission of evidence pertaining to immigration status unless essential to the case and more probative than prejudicial. ER 413; *see* Proposal to Adopt New Rule of Evidence 413, Comments, GR 9 Cover Sheet, available at: https://www.courts.wa.gov/court_rules/?fa=court_rules.proposedRuleDisplay&ruleId=605 (last viewed Feb. 6, 2018).

The prosecution offered a substantial amount of evidence about Mr. Aguilar's lack of citizenship and his fraudulent use of a Mexican identity card. *See* Opening Brief at 44-45. It discussed his lack of citizenship in its opening statement, informing jurors it would show Mr.

Aguilar “was not a citizen of the United States and had possession of two firearms,” 4/1/16RP 975; *see Id.* at 968 (telling jurors Mr. Aguilar had Mexican identity cards in another person’s name, with his picture). This evidence was admitted only because the prosecution charged him with failing to register a firearm as an alien, even though the court repeatedly warned the prosecution it would not be able to prove this charge and it voiced concern over the prejudicial effect of this illegal immigration allegation. *See* 4/12/16RP 2301-05 (court and defense concern of “immediate” prejudicial impact of illegal entry evidence and question its irrelevance when court might dismiss charge); 4/13/16RP 2560 (defense repeats objection to prejudicial effect); 4/8/16RP 2038, 2040(court “very concerned” about charge and evidence of alien in possession when prosecution may not be able to prove it)

As the trial court correctly recognized and the Supreme Court has definitively established, there is “significant danger” that jurors will be improperly prejudiced by evidence of illegal immigration. *See Salas*, 168 Wn.2d at 672. The prosecution’s irresponsible insistence that it push forward with a charge it would be unable to prove that would cause substantial prejudice further undermined the fairness of Mr. Aguilar’s trial.

These numerous improprieties, considered together with the other errors in the case and the weakness of the evidence of premediated intent, and result in an unfair trial.

B. CONCLUSION.

Due to myriad prejudicial errors and their cumulative effect, this Court should order a new trial, and also reverse the first degree murder conviction due to impermissibly speculative evidence of premeditation.

DATED this 7th day of February 2018.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Nancy P. Collins', written in a cursive style.

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JOSE AGUILAR,)	
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