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COURT OF APPEALS  
DIVISION III  
OF THE STATE OF WASHINGTON

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STATE OF WASHINGTON, RESPONDENT

v.

PEDRO HILLIARD, APPELLANT

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APPEAL FROM THE SUPERIOR COURT  
OF SPOKANE COUNTY

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**BRIEF OF RESPONDENT**

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## **I. APPELLANT'S ASSIGNMENTS OF ERROR**

1. The use of the term "controlled buy" to describe the interactions between the defendant and the confidential informant was improper.
2. The State committed prosecutorial misconduct by arguing to the jury that the defendant should be held accountable for his actions.

## **II. ISSUES PRESENTED**

1. Where the defendant did not object below to the allegedly impermissible use of the term "controlled buy" throughout trial, may he now raise the issue for the first time on appeal where the alleged error is not "manifest"?
2. Is the use of the term "controlled buy" improper when it is used to define a particular type of police activity, and does not intrude on the question of the defendant's guilt?
3. Was any alleged prosecutorial misconduct during closing argument so flagrant and ill-intentioned that no curative instruction would have obviated any prejudice to the defendant?

## **III. STATEMENT OF THE CASE**

Over the course of three months in 2014, detectives with the Spokane Police Department (SPD), through the use of a confidential informant (CI), conducted three "controlled buys" of oxycodone from Pedro

Hilliard, the defendant. I RP<sup>1</sup> 98, 106, 114. Detectives had opened an investigation into Mr. Hilliard based on information received from the CI. I RP 96. The CI had been working with law enforcement since 2013. I RP 125. The CI was tasked with finding individuals “involved in the distribution of controlled substances” and one such individual was Mr. Hilliard. I RP 96-97. The CI informed detectives that he could buy oxycodone pills from Mr. Hilliard. I RP 96.

With this information, Detective Bowman set up the three “controlled buys” from Mr. Hilliard, with the help of other officers and the CI. I RP 96, 98. The three buys were conducted on June 12, August 20, and September 25, 2014. I RP 98, 106, 114. A “controlled buy,” as described by Detective Bowman, follows a certain procedure:

The CI is contacted at a specific location. He is taken to another location where a strip-search is done of his person just to confirm that he has no controlled substances on his person that he is bringing into the operation itself. Once that's completed, then we have the CI, confidential informant, contact the target, set up the buy location and the time. Surveillance is set up at that location. The CI is provided with pre-recorded U.S. currency, also known as buy money, and then the CI is either transported or released to go to that location. The CI is kept under surveillance as he goes out and contacts the target and exchanges the pre-recorded U.S. currency for the controlled substances. Surveillance watches him walk back to the control vehicle.

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<sup>1</sup> For purposes of this brief, respondent adopts the same manner of identifying the Verbatim Reports of Proceedings as set forth in Appellant’s Brief at 2-3, n.1.

The drugs are surrendered. He's brought back for his second search. At the conclusion of that search, then he's released and then the drugs are brought back to the office, field-tested, packaged into a drug envelope and then placed on police evidence.

I RP 84-85.<sup>2</sup>

Each of the three “controlled buys” from Mr. Hilliard was conducted in the manner described above. *See* I RP 98-123. In each, the CI was initially searched by detectives and given money with which to purchase oxycodone pills. I RP 98, 107, 115; II RP 231, 237. The CI would call Mr. Hilliard to set up a specific place and time for the buy. I RP 99, 107, 115. The CI was then taken to the location of the buy and released, while under surveillance by detectives. I RP 100-101, 107, 115-116. After the transaction with Mr. Hilliard was completed, the CI would return to the detectives and relinquish the pills he had bought with the money provided to him. I RP 103, 109, 120; II RP 233, 236, 239. Another search of the CI was conducted to ensure nothing (money or contraband) was being concealed. I RP 103, 109, 120; II RP 233, 236, 241. Later, the pills were

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<sup>2</sup> A “controlled buy” can be differentiated from an “undercover buy,” which was described by Detective Bowman to be conducted thusly: “... [I]f you are a police officer and you've been introduced [to a drug dealer, I RP 82] is that we drive and you contact the person under the direction of a case manager and dressed as a common citizen and you contact that person, exchange money for controlled substance.” I RP 83.

analyzed at the Washington State Patrol Crime Laboratory and confirmed to be oxycodone. II RP 201, 207-209.

As a result of the investigation, Pedro Hilliard was charged with three counts of Delivery of a Controlled Substance in Spokane County Superior Court, CP 1. The State amended the charges to include enhancements on January 19, 2017. CP 86-87. Trial began on January 24, 2017, before the Honorable R. Clary. I RP 1. Prior to the start of testimony, both sides submitted and argued a number of motions in limine before the court. I RP 41-43, 43-70; CP 12-17, 18-21. The defense did not make a motion in limine to prohibit or prevent the use of the term “controlled buy.”

Trial lasted three days. II RP 197. At the close of testimony, both sides presented closing arguments to the jury, with the State making a rebuttal argument as well. II RP 304-321. In its closing, the State reviewed the evidence proffered through testimony and exhibits, arguing this evidence was sufficient to find the defendant guilty. II RP 304-310. The defense, in its closing, focused almost entirely on the testimony of the CI, Mike Skiles. II RP 310-317. The defense asked the jury to not believe Mr. Skiles, painting him as a thief and a drug addict, and his testimony as not credible. *Id.* The State, on rebuttal, responded:

This is not about Mr. Skiles. This is about holding Mr. Hilliard accountable.

...

That is what we are doing here. He is holding him accountable for it. Mr. Skiles admitted that he wasn't great and, you know, what it would have been fantastic to have the perfect soccer mom who has never been arrested, who never committed a crime, sitting on that stand. I understand that. We all should. But you know, who doesn't want to do that kind of work? The perfect soccer mom. Who we get are people who are already involved in it. He knew him. He knew him for years. He went back and bought drugs from him. He knew who he was. He knew his phone number. He knew how to contact him. It would be hard to get somebody else to get there.

How do we hold him accountable? How do we even get to that point if we don't have anybody to even work with to buy, to catch him doing it? It's not Mr. Skiles' accountability here. It's his. That's who we are holding accountable here right now. The only person today who is on trial, the only person that we have to worry about is Mr. Hilliard and what he did that day.

II RP 317-318. Counsel for the defendant did not object to the argument, although he did object to the prosecutor pointing at the defendant.

II RP 317.

After deliberation, the jury found Mr. Hilliard guilty of all charges, and answered both questions to the enhancements in the affirmative. CP 24-27; II RP 325-326. This appeal now follows. CP 56-57.

#### IV. ARGUMENT

##### **A. THE USE OF THE TERM “CONTROLLED BUY” WAS NOT IMPROPER, AND APPELLANT HAS NOT DEMONSTRATED THE EXISTENCE OF A MANIFEST ERROR AFFECTING A CONSTITUTIONAL RIGHT PURSUANT TO RAP 2.5(A)(3).**

It is considered a fundamental principle of appellate jurisprudence that a party may not assert on appeal a claim that was not first raised at trial. RAP 2.5(a); *State v. Strine*, 176 Wn.2d 742, 749, 293 P.3d 1177 (2013). Such a rule “affords the trial court an opportunity to rule correctly upon a matter before it can be presented on appeal.” *Id.* at 749 (quoting *New Meadows Holding Co. v. Wash. Water Power Co.*, 102 Wash.2d 495, 498, 687 P.2d 212 (1984)). This rule supports a basic sense of fairness, perhaps best expressed in *Strine*:

[I]t serves the goal of judicial economy by enabling trial courts to correct mistakes and thereby obviate the needless expense of appellate review and further trials, facilitates appellate review by ensuring that a complete record of the issues will be available, ensures that attorneys will act in good faith by discouraging them from “riding the verdict” by purposefully refraining from objecting and saving the issue for appeal in the event of an adverse verdict, and prevents adversarial unfairness by ensuring that the prevailing party is not deprived of victory by claimed errors that he had no opportunity to address.

*Strine*, 176 Wn.2d at 749-50 (quoting BENNETT L. GERSHMAN, TRIAL ERROR AND MISCONDUCT § 6-2(b), at 472-73 (2d ed. 2007) (footnotes omitted)).

Under RAP 2.5(a)(3), a party may not raise a claim of error on appeal that was not first raised at trial unless the claim involves a manifest

error affecting a constitutional right.<sup>3</sup> However, our courts have indicated that “the constitutional error exception is not intended to afford criminal defendants a means for obtaining new trials whenever they can ‘identify a constitutional issue not litigated below.’” *State v. Scott*, 110 Wn.2d 682, 687, 757 P.2d 492 (1988). To establish that the alleged constitutional error is reviewable, the defendant must establish that the error is “manifest.”

In order to ensure the actual prejudice and harmless error analyses are separate, the focus of the actual prejudice must be on whether the error is *so obvious on the record* that the error warrants appellate review. See *Harclon*, 56 Wn.2d at 597, 354 P.2d 928; *McFarland*, 127 Wn.2d at 333, 899 P.2d 1251. It is not the role of an appellate court on direct appeal to address claims where the trial court could not have foreseen the potential error or where the prosecutor or trial counsel could have been justified in their actions or failure to object. Thus, to determine whether an error is practical and identifiable, the appellate court must place itself in the shoes of the trial court to ascertain whether, given what the trial court knew at that time, the court could have corrected the error.

*State v. O’Hara*, 167 Wn.2d 91, 99-100, 217 P.3d 756 (2009), *as corrected* (Jan. 21, 2010) (footnote omitted) (emphasis added).

Mr. Hilliard claims the use of the term “controlled buy” throughout his trial improperly prejudiced his right to a fair trial by offering an opinion that a criminal act had occurred and Mr. Hilliard was guilty of that crime.

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<sup>3</sup> An issue may also be raised for the first time on appeal if it involves trial court jurisdiction or failure to establish facts upon which relief can be granted. RAP 2.5(a)(1) and (2).

See Br. of Appellant at 5-6. Mr. Hilliard likens the use of “controlled buy” to the fraught use of the word “victim.” Br. of Appellant at 6. In some jurisdictions, referring to a “victim” can be problematic; in some instances, whether there is in fact a “victim” goes to the very heart of the issue in a case. For example, in *State v. Albino*, 130 Conn. App. 745, 24 A.3d 602 (2011), the defendant was charged with murder. The frequent use of “victim” was deemed improper because the issue in the case was whether the defendant acted in self-defense. “[I]f the jury credited [the defendant’s] self-defense claim, there would have been no victim, no murder and no murder weapon in this case, and the prosecutor’s use of those words, therefore, improperly implied to the jury that he believed the defendant was guilty.” *Albino*, 130 Conn. App. at 760. Cf. *State v. Devey*, 138 P.3d 90 (Utah App. 2006) (a single reference to a “victim” when the issue was whether crime occurred was harmless error, although motion in limine prohibiting use of the term may have been improperly denied).

Very few published cases in Washington address the use of “victim” during trial. One is *State v. Alger*, 31 Wn. App. 244, 640 P.2d 44 (1982), a prosecution for statutory rape. The court read to the jury a stipulation to the fact that the defendant had not been married to “the victim.” *Id.* at 248-249. On appeal, the defendant challenged the reference as a judicial comment on the evidence in violation of our state constitution. *Id.* at 249. Without

deciding whether it was error, the court determined that the single reference did not prejudice the defendant. *Id.*

In contrast, there are exactly zero cases in Washington that address the use of the term “controlled buy” during trial.<sup>4</sup> Without such, Mr. Hilliard is reduced to making the specious argument that “victim” and “controlled buy” are comparable, when they simply are not. As discussed above, the use of “victim” can be problematic depending upon the context of its use, particularly if its use encroaches on issues a jury would decide. The use of “controlled buy” does not raise these concerns. “Controlled buy” can best be viewed as a term of art, referring to a specific type of police operation; the term describes a manner or procedure for conducting the purchase of illegal substances by law enforcement. “Controlled buy” does not in any way imply or opine on whether a defendant is guilty of the crime alleged. A more apt analogy, if Mr. Hilliard’s argument is to be accepted, would be perhaps the State using the terms “buyer” and “seller” throughout trial when referring to the CI and Mr. Hilliard, respectively. “Controlled buy” was used merely as shorthand for the nature of the police investigation into Mr. Hilliard. *See* I RP 84-93, 99-100.

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<sup>4</sup> The term “controlled buy” begins to appear in court decisions in the early 1970s. *See State v. Doe*, 6 Wn. App. 978, 497 P.2d 599 (1972), *review denied*, 81 Wn.2d 1004 (1972), *and State v. Sewell*, 11 Wn. App. 546, 524 P.2d 455 (1974).

Without any supporting precedent, an imperfect analogy, and no objection by trial counsel,<sup>5</sup> the use of “controlled buy” was not error and is not sufficiently manifest to invite review under RAP 2.5(a).

**B. THE PROSECUTOR DID NOT COMMIT MISCONDUCT BY ASKING THE JURY TO HOLD THE DEFENDANT ACCOUNTABLE.**

To prevail on a claim of prosecutorial misconduct, a defendant must demonstrate that, in the context of the record and all of the circumstances of the trial, the prosecutor’s conduct was both improper and prejudicial. *State v. Thorgerson*, 172 Wn.2d 438, 442, 258 P.3d 43 (2011). Misconduct is prejudicial if there is a substantial likelihood it affected the verdict. *State v. Emery*, 174 Wn.2d 741, 760-61, 278 P.3d 653 (2012). Where, as here, the defendant fails to object<sup>6</sup> at trial to the challenged conduct, he or she waives the misconduct claim unless the argument was so “flagrant and

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<sup>5</sup> “Controlled buy” was not used only by the State and its witnesses. The term was used during trial by defense counsel as well. *See* I RP 124, 127, 181; *and* II RP 245, 272, 273, 275, 277.

<sup>6</sup> “If either counsel indulges in any improper remarks during closing argument, the other must interpose an objection at the time they are made. This is to give the court an opportunity to correct counsel, and to caution the jurors against being influenced by such remarks.” 13 Royce A. Ferguson, Jr., *Washington Practice: Criminal Practice and Procedure* § 4505, at 295 (3d ed. 2004). Objections are required not only to prevent counsel from making additional improper remarks, but also to prevent potential abuse of the appellate process. *State v. Weber*, 159 Wn.2d 252, 271-272, 149 P.3d 646 (2006) (were a party not required to object, a party “could simply lie back, not allowing the trial court to avoid the potential prejudice, gamble on the verdict, and then seek a new trial on appeal”).

ill[-]intentioned” that “no curative instruction would have obviated any prejudicial effect on the jury.” *Id.* (quoting *Thorgerson*, 172 Wn.2d at 455); *see also State v. Belgarde*, 110 Wn.2d 504, 755 P.2d 174 (1988), and *State v. Russell*, 125 Wn.2d 24, 86, 882 P.2d 747 (1994). Under this standard, the defendant must show that (1) “no curative instruction would have obviated any prejudicial effect on the jury” and (2) the misconduct resulted in prejudice that “had a substantial likelihood of affecting the jury verdict.” *Thorgerson*, 172 Wn.2d at 455. To this end, an appellate court does not review a prosecutor’s statements in isolation, but rather in the context of the overall argument, the issues in the case, the evidence that was addressed in the argument, and the jury instructions. *State v. McKenzie*, 157 Wn.2d 44, 52, 134 P.3d 221 (2006); *see also State v. Boehning*, 127 Wn. App. 511, 519, 111 P.3d 899 (2005).

A prosecutor “represents the [S]tate, and in the interest of justice must act impartially.” *State v. Huson*, 73 Wn.2d 660, 663, 440 P.2d 192 (1968). A prosecutor “must seek a verdict free of prejudice and based on reason.” *Id.* Especially, “a prosecutor may not urge jurors to convict a criminal defendant in order to protect community values, preserve civil order, or deter future lawbreaking.” *United States v. Solivan*, 937 F.2d 1146, 1153 (6<sup>th</sup> Cir. 1991) (quoting *United States v. Monaghan*, 741 F.2d 1434, 1441 (D.C. Cir. 1984), *cert. denied*, 470 U.S. 1085, 105 S.Ct. 1847,

85 L.Ed.2d 146 (1985)). A prosecutor also cannot request a jury to “declare the truth” of a crime, *State v. Anderson*, 153 Wn. App. 417, 429, 220 P.3d 1273 (2009), nor can a prosecutor state “personal beliefs about the defendant’s guilt or innocence or the credibility of the witnesses,” *State v. Dhaliwal*, 150 Wn.2d 559, 577-578, 79 P.3d 432 (2003) (citing *State v. Reed*, 102 Wn.2d 140, 145, 684 P.2d 699 (1984)).

Arguing, as the prosecutor did in the instant case, that a defendant be held accountable for his actions is not comparably improper. The prosecutor made the allegedly improper comments at issue here during the State’s rebuttal closing argument, after defense counsel questioned the State’s evidence in closing, particularly the credibility of the CI. In response, the prosecutor argued the jury should instead hold Mr. Hilliard accountable *by focusing on the evidence sufficient to find him guilty*. II RP 318-320. Taken in context, the prosecutor’s comments were not improper. *McKenzie*, 157 Wn.2d at 52.

Most similar to the case before this Court is the unreported decision in *State v. Hoeg*, 192 Wn. App. 1052, 2016 WL 790942 (Div. I, 2016).<sup>7</sup> In

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<sup>7</sup> Under GR 14.1, a party may cite to an unpublished decision of the Court of Appeals filed on or after March 1, 2013. Unpublished opinions of the Court of Appeals have no precedential value, are not binding on any court, and may be accorded such persuasive value as the court deems appropriate. GR 14.1(a).

*Hoeg*, the prosecutor discussed the concept of accountability in closing, arguing the defendant did not want to take accountability for his actions. The court in *Hoeg* pointed out the lack of authority in Washington holding the “accountability” argument to be flagrant or ill-intentioned. Instead, *Hoeg* cited with approval a case from Minnesota, *State v. Montjoy*, 366 N.W.2d 103 (Minn. 1985), in which a similar argument was made. Both *Hoeg* and *Montjoy* found the prosecutor’s statements regarding accountability to be “not an attempt to skew the State's burden of proof or inflame the jury but, rather, were designed to ensure a just verdict based on the evidence.” *Hoeg*, 2016 WL 790942 at \*6.

Here, the defendant has failed to demonstrate how the prosecutor’s statements were so flagrant and ill-intentioned that the court could not have cured any resulting prejudice by an instruction to the jury to disregard the argument. When viewed in this light, the remarks made by the prosecutor were not inappropriate, and were certainly not so flagrant and ill-intentioned as is required for review of claimed, yet unobjected-to, prosecutorial misconduct.

## **V. CONCLUSION**

The term “controlled buy” is not error as it in no way is comparable to the term “victim.” The prosecutor’s statements in rebuttal asking the jury to hold the defendant accountable were not so flagrant and ill-intentioned

that a curative instruction would have been insufficient to cure any potential prejudice to the defendant. Appellant's claims should be denied.

Dated this 29 day of November, 2017.

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IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON  
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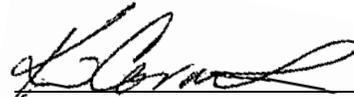
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SERVICE

I certify under penalty of perjury under the laws of the State of Washington, that on November 29, 2017, I e-mailed a copy of the Brief of Respondent in this matter, to:

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(Place)

  
(Signature)

**SPOKANE COUNTY PROSECUTOR**

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