

FILED
Court of Appeals
Division III
State of Washington
3/29/2019 4:55 PM

NO. 36074-1-III

COURT OF APPEALS, DIVISION III

OF THE STATE OF WASHINGTON

STATE OF WASHINGTON, Respondent,

v.

HECTOR CARRASCO RAMOS, Appellant.

BRIEF OF RESPONDENT

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I. ISSUES PRESENTED BY ASSIGNMENTS OF ERROR

- A. Has Ramos failed to show prosecutorial misconduct because he cannot show a substantial likelihood that the prosecutor's statement affected the jury's verdict?
- B. Has Ramos failed to show that the trial court abused its discretion in denying his motion for a mistrial where there was overwhelming incriminating evidence of Ramos' drug possession and the prosecutor's statement was consistent with evidence admitted at trial?
- C. Should the DNA fee be stricken because Ramos' DNA was previously collected?

II. STATEMENT OF THE CASE

The appellant, Hector Ramos, was charged with third degree assault and possession of a controlled substance, methamphetamine. CP 6. The assault charge alleged that Ramos assaulted a law enforcement officer performing official duties at the time of the assault. CP 6. In this case, the "official duty" being performed was the officer arresting Ramos on a felony DOC warrant. CP 2, 5. YPD Officer Hipner saw Ramos and followed him in her patrol car after seeing him come out of an alley. SE 10; RP 8. After following him for a block, she jumped out of her car and a struggle ensued. SE 10; RP 9, 10. The State's theory was that Ramos fought with the officer and kicked Officer Hipner during this struggle. CP 2-3. The drug charge involved drugs that were found in Ramos' pants pocket during a subsequent search incident to arrest. CP 2-3.

First Trial

On January 29, 2018, prior to Ramos' first trial, the court heard a CrR 3.5 hearing and motions in limine. The 3.5 hearing involved statements that Ramos made on two COBAN videos, one from Officer Agledal's patrol vehicle, and one from Officer Hipner's vehicle. RP 3-4. The State later decided not to admit Officer Agledal's video as evidence at trial. CP 72.¹

As for Officer Hipner's video, the State sought to play the first 8 minutes and 15 seconds of the video. RP 4, 6. The video shows Officer Hipner following Ramos in her patrol vehicle. SE 10, CP 71. Ramos walks slowly down the middle of an alleyway. *Id.* When Ramos gets to his grandmother's house, Officer Hipner gets out of the car and tries to arrest Ramos. *Id.* At this point, because of the camera angle, the COBAN video does not show what Officer Hipner or Ramos are doing. *Id.* The COBAN does provide the audio of both parties. *Id.* On the COBAN, one can hear Officer Hipner telling Ramos "Hi, you need to get on the ground. Let me see your hands. Mr. Ramos, you have a warrant." SE 10. A few seconds later, she tells him, "You got a DOC pickup." SE 10.

¹ The State filed a supplemental designation of clerk's papers on 3/29/19. They are not numbered yet, but the State anticipates that that Findings of Fact and Conclusions of Law will be numbered 70-73.

Officer Hipner testified at the CrR 3.5 hearing that a “DOC pickup” means an “escape warrant through the Department of Corrections.” RP 16. She testified that it is a “secretary’s warrant,” which is “an arrest warrant from the secretary stating that you will arrest this person and bring him before us.” RP 16. Officer Hipner knew that there was a DOC warrant because she was told at an earlier call that there was a “DOC felony pickup.” RP 20.

Officer Agledal also testified at the CrR 3.5 hearing. RP 20. He also knew that Ramos was wanted for a warrant. RP 24. After Ramos was detained in handcuffs, Officer Agledal told Ramos that he was under arrest and being recorded. RP 33. Several minutes later, Ramos asked what he was being arrested for. RP 33. Officer Agledal told Ramos that he had a warrant. RP 34.

Ramos also testified at the CrR 3.5 hearing. RP 39. The court held that Ramos was in custody but not subject to any type of interrogation. RP 53, CP 72. The court ruled:

Consequently, the audio portion of the COBAN and Officer Hipner’s narration and Officer Agledal’s narration as well as to what Mr. Ramos said to them while they were attempting to gain control of him is admissible because it’s simply not the product of interrogation. It’s custodial certainly but not the product of interrogation. Consequently, it’s admissible

and part of the res gestae in this particular matter.

RP 54. Findings of fact and conclusions of law were subsequently filed. CP 70-73.

Ramos' attorney agreed that the officers could testify that he had an arrest warrant for him. RP 54. However, he did not want the officers to testify that there was a "previous incident" or a "felony warrant." RP 54. The State agreed to the request. The court held that the officer could "testify to the description they were provided when they were seeking to arrest him on the arrest warrant." RP 55. The prosecutor agreed to tell the officers not to testify as to who told them to arrest Ramos, or to testify about a "DOC warrant or anything else." RP 55.

On January 30, 2018, the prosecutor handling the case, Ms. Holbrook, was ill and had another prosecutor, Mr. Aaron, step in to try the case. RP 58. The court reminded the new prosecutor of the pretrial motion that was heard the day before. RP 59. The judge stated:

The only thing of import would be that the officers should reference that they were attempting to contact Mr. Ramos to arrest him on a warrant, **a DOC warrant**. There is an agreement there will be no mention of the nature of the warrant, just a warrant.

RP 59 (emphasis added). After jury selection, the prosecutor gave his opening statement. During his opening, he stated: "On September 25th,

the defendant was arrested on a Department of Corrections warrant. He had an existing warrant out from the Department of Corrections.” RP 132. The court excused the jury. RP 133. The prosecutor stated that he believed he could mention it was a DOC warrant but not what the warrant was for. RP 133. The trial judge concluded that the prosecutor’s statement was inadvertent and unintentional, and added, “It’s maybe a lack of clarity on my part.” RP 133, 135.

Ramos’ attorney initially asked for curative instruction to the jury, but after speaking with Ramos, asked for a mistrial. RP 134-5. The court declared a mistrial based on the unintentional violation of the pretrial ruling. RP 136; CP 17.

Retrial

The retrial began on March 13, 2018. RP 138. The original prosecutor, Ms. Holbrook, was now back on the case. The trial judge went over the pretrial rulings:

The officers will testify that they were attempting to locate Mr. Ramos in order to serve an arrest warrant, just a generic arrest warrant, not a DOC warrant. We agreed on that.

RP 140. The prosecutor asked for clarification from the court because the COBAN video included Officer Hipner telling Ramos that it’s a “DOC

warrant.” RP 140.² Ramos’s attorney agreed that the COBAN can stand.

RP 141. The court ruled:

In any event, I don’t know that we can excise it from the COBAN recording. That would just probably give it more emphasis. It won’t be mentioned by the witnesses and it won’t be mentioned by counsel. There will be no mention of domestic violence or trespassing, simply that the officers were attempting to locate Mr. Ramos because they had a warrant for his arrest and were attempting to serve the warrant.

RP 142.

During the retrial, officer Hipner testified that when she arrives for work, she is briefed on “wanted subjects,” individuals with warrants. RP 223-24. She saw Ramos and knew he was “wanted.” RP 224. She testified that she took him to the ground, “Because he had a warrant. He had a warrant for his arrest, and I told him that when I got out of the car.” RP 230. Officer Hipner did not testify what the warrant was for and the prosecutor never asked her what it was for.

Officer Hipner’s COBAN video was admitted without objection from Ramos and played for the jury. RP 242. On the COBAN video, Officer Hipner is heard telling the defendant, “Mr. Ramos, you have a warrant,” and “You got a DOC pickup.” SE 10.

² The actual language in the video is “DOC pickup.” SE 10.

Officer Agledal also testified about his duties working patrol, including arresting people with warrants. RP 261. He testified that Officer Hipner and he “were notified of somebody with a warrant and given a physical description of that person.” RP 262. He assisted Officer Hipner who had radioed that she found the subject being sought and was following him in an alley. RP 262-3. Officer Agledal told the jury that Ramos had a “warrant for his arrest.” RP 266. Officer Agledal never testified what the warrant was for and the prosecutor never asked him what it was for.

In a search of Ramos’ pockets, Officer Agledal found a small clear baggy with a white crystalline substance, which he recognized to be methamphetamine from his police training and experience. RP 270. A Washington State Patrol forensic scientist concluded that the substance was methamphetamine based on two examinations she conducted. RP 301-03. The crime lab report was also admitted at trial. CP 44.

Ramos testified at trial and maintained that he did not kick anybody and did not cause the officers’ injuries. RP 326-7. In addition, Ramos’ defense at trial was that he resisted because he did not know that the officers were law enforcement officers. RP 330-31, 333. Regarding the drugs, Ramos claimed that he did not recognize Exhibit 12, the plastic bag of methamphetamine. RP 326.

On cross-examination, Ramos testified, “I heard somebody ask for my hands. I didn’t know they were officers.” RP 330. He explained, “Because they never identified themselves. They never told me who they were. I never heard sirens. I never saw lights. That’s why. I did not know they were officers until I got picked up, after the whole incident happened.” RP 331. The prosecutor cross-examined him on this point, asking “...when the officers approached you and you were wiggling around on the ground with your hands on your stomach and Officer Hipner was telling you multiple times about the warrant and the pickup, you didn’t know they were law enforcement?” RP 333. Ramos replied, “I didn’t.” *Id.* During cross, the prosecutor never asked Ramos what the warrant was for or try to elicit any information about Ramos’ criminal background or history.

During closing arguments, the prosecutor analyzed Ramos’ claim that he had no idea that Officer Hipner was a law enforcement officer. RP 359. She pointed out Officer Hipner’s fully-marked patrol car and uniform, and the officer following him in the patrol car. RP 359. She then mentioned the COBAN recording and what was shown on the recording:

Hector Ramos indicated that he had no idea they were law enforcement, either one of them. They never identified themselves as police. Now, you can actually hear that on the recording. We listened to 8 minutes and

15 seconds. They don't say, hey, we're law enforcement, police. We can hear that. Hector is right about that. They said they had a warrant, that they were arresting him. They are both in uniform. So it's up to you to decide if they are clearly identified as law enforcement.

RP 360.

The prosecutor moved on to talk about what an assault is and explained what happened with Officer Hipner. She stated, "She goes to approach him. She tells him he has a DOC warrant." RP 360. Ramos' attorney objected and moved to strike. RP 361. The trial judge asked, "on what basis?" *Id.* The defense attorney responded, "on the court's pretrial ruling." *Id.* The objection was then sustained. *Id.* The prosecutor then rephrased, stating, "So they go to arrest him on a warrant," and continued the closing argument without any further references to a DOC warrant.

RP 361.

During closing arguments, the defense primarily focused on the assault charge, arguing that the injuries were caused accidentally and not intentionally. RP 367-72. As for the drug charge, the defense provided very little argument. RP 372. They did point out that Ramos' testimony contradicted the officers in that Ramos testified that he was never shown a baggy similar to the one admitted by the State. RP 372. And they pointed out that the conclusion of the lab tech was entirely dependent on the work

of the officers. RP 372. The defense argued that the charges were not proven beyond a reasonable doubt. RP 373. Ramos did not raise any affirmative defenses, such as unwitting possession.

Motion for Mistrial

After closing arguments, and outside the presence of the jury, Ramos moved for a mistrial. The prosecutor responded that she was referring to the COBAN and what had been discussed on the COBAN. RP 379. The court said it was a boneheaded move and reserved a ruling until after jury deliberations. RP 379. Ramos did not ask for a curative instruction to the jury.

Ramos was convicted of possession of a controlled substance. CP 41. The jury was unable to reach a verdict on count one, the assault count. CP 40. The court then ruled on the motion for mistrial, stating:

In any event, I would also indicate that I think your motion at this point probably is moot about the mention of the DOC warrant. It doesn't appear to me that that there was any serious contest as to Count 2, the charge of possession of methamphetamine. I don't think the mention of the DOC warrant affected in any fashion the jury's verdict as to Count 2.

RP 386. Ramos and the State made further arguments to the court on the issue of the the motion for a mistrial. The Court stated,

I don't think it was inadvertent. I think it was misguided. I think, given all the hullabaloo allow [sic] about the pretrial rulings, that it was an area that the state should never have gone into. It was misguided to do so.

RP 388.

The Court dismissed count one on the motion of the State. CP 45. Ramos was sentenced to 18 months on count two. CP 47. As part of his legal costs, he was assessed a \$100 DNA collection fee. CP 64. This appeal followed.

III. ARGUMENT

A. Ramos has failed to show prosecutorial misconduct because he cannot show a substantial likelihood that the prosecutor's statement affected the jury's verdict.

While the use of the term "DOC warrant" violated the court's pretrial motion in limine, Ramos has not proven that the violation constitutes prosecutorial misconduct.

To show prosecutorial misconduct, the defendant must show the prosecutor's conduct was both improper and prejudicial in the context of the entire record and the circumstances at trial. *State v. Magers*, 174 Wn.2d 174, 191, 189 P.3d 126 (2008). In order to prove the conduct was prejudicial, the defendant must prove there is a "substantial likelihood the misconduct affected the jury's verdict." *State v. Weber*, 159 Wn.2d 252,

279 149 P.3d 646 (2006). Reversal is not required “unless within reasonable probabilities, the outcome of the trial would have been materially affected had the error not occurred.” *Id.* Great weight is placed on the sound discretion of the trial court, which is not reversed absent a showing of an abuse of discretion. *State v. Weber*, 99 Wn. 2d 158, 164-65, 659 P.2d 1102 (1983).

Here, there was no dispute that the parties could tell the jury that Ramos had a warrant for his arrest. The charge was third degree assault on a law enforcement officer and the State had to prove that the officers were performing official duties at the time of the assault. CP 6, CP 26. The fact that there was a warrant was admitted without objection. RP 54.

The only error complained of in this case is the prosecutor’s sole reference to the warrant as a “DOC warrant” at one point in her closing argument. At all other times during the prosecutor’s closing argument, she referred to the warrant as simply a “warrant.” RP 360, 361, 364. In opening statements, she referred to the warrant as an arrest warrant. RP 218. During cross-examination of Ramos, she referred to it as simply a warrant or “pickup.” RP 333. All the witnesses, in compliance with the court’s order, referred to the warrant as an arrest warrant. *See* RP 224, 230, 261, 262, 266. No one mentioned *why* there was a DOC warrant or explained what the acronym DOC stands for.

In addition, there was no objection to admitting Officer Hipner's statement on COBAN telling Ramos he has a warrant and then shortly after that, "You got a DOC pickup." RP 141, SE 10. The prosecutor's recitation of the evidence, while technically in violation of a pretrial ruling, was completely consistent with the evidence properly admitted at trial.

To prove prosecutorial misconduct, however, it is not enough to show that the prosecutor violated a motion in limine. Ramos must prove that the error likely affected the jury's verdict. *See State v. Weber*, 159 Wn.2d 252, 279 149 P.3d 646 (2006). Trial courts are "in the best position to determine if a trial irregularity caused prejudice." *State v. Wade*, 186 Wn. App. 749, 773, 346 P.3d 838 (2015). Here, the defendant has failed to carry his burden that there is a substantial likelihood that the prosecutor's misconduct affected the jury's verdict. This is particularly true in light of the Coban statement that the trial court had previously admitted, and in light of the overwhelming evidence presented against Ramos on his drug charge.

In this case, officers found a baggie of drugs in Ramos' pocket in a search incident to arrest. RP 270. The drugs were tested at the crime lab and found to be methamphetamine. RP 301-03. Ramos presented very little in terms of a defense to the drug charge, instead focusing on the

assault charge. His defense consisted of his testimony that he did not recognize the drugs and had never been shown the baggie. *See* RP 372. He did not raise any affirmative defenses, but simply argued that the State had not met the burden of proof beyond a reasonable doubt. *See* RP 373. As indicated by the trial judge, “It doesn’t appear to me that there was any serious contest as to Count 2...” RP 386. As such, given the great deference given to the trial judge, Ramos has not shown a substantial likelihood that the prosecutor’s misconduct affected the jury’s verdict.

B. Ramos has failed to show that the trial court abused its discretion in denying his motion for mistrial

This court applies the abuse of discretion standard in reviewing a trial court’s denial of a motion for mistrial. *State v. Hopson*, 113 Wash. 2d 273, 284, 778 P.2d 1014, 1019-20 (1989). An appellate court finds abuse only “when no reasonable judge would have reached the same conclusion.” *Id.*

A trial court should grant a mistrial when, viewed in light of all the evidence, the defendant has suffered prejudice such that nothing short of a new trial will insure that the defendant receives a fair trial. *State v. Rodriguez*, 146 Wn.2d 260, 270, 45 P.3d 541 (2002); *State v. Thompson*, 90 Wn. App. 41, 47, 950 P.2d 977 (1998). In determining the effect of an irregularity, the court examines (1) its seriousness; (2) whether it involved

cumulative evidence; and (3) whether the trial court properly instructed the jury to disregard it. *State v. Hopson*, 113 Wn.2d 273, 284-86, 778 P.2d 1014 (1989); *State v. Weber*, 99 Wn.2d 158, 165-66, 659 P.2d 1102 (1983).

Addressing the first prong, seriousness, the prosecutor's statement only occurred once in a trial where the jury already knew that there was a warrant and a "DOC pickup." The jury already had some prejudicial information about the defendant because he had a warrant, meaning a judge had authorized his arrest and detention. The issue is whether the prosecutor's statement in closing argument, referring to the warrant as a DOC warrant, make this a *serious* irregularity. The term "DOC" stands for Department of Corrections, but this was never explained to the jury. There was no testimony about why Ramos had a DOC warrant. Furthermore, as explained above, there was overwhelming incriminating evidence of Ramos' drug possession. As such, in light of the entire trial, the prosecutor's isolated and brief reference to a DOC warrant in argument was not a serious irregularity warranting a mistrial.

As for the second prong, the "admission of testimony that is otherwise excludable is not prejudicial error where similar testimony was admitted earlier without objection." *State v. Weber*, 159 Wn. 2d at 276. Here, there was no objection to admitting Officer Hipner's statement to

Ramos that he has a “DOC pickup.” RP 141. Further, the jury was instructed that they are to decide the facts of the case based on the evidence presented to them during the trial. CP 21. They were further instructed to consider the testimony and exhibits admitted during the trial. *Id.* As such, the prosecutor’s later statement in closing, although not testimony, was clearly consistent with the evidence properly admitted at trial and before the jury for consideration.

As to the third prong, Ramos never asked for a curative instruction. This, however, can be strategy, to avoid emphasizing the fact that the warrant was a DOC warrant. Here, the prosecutor didn’t elicit testimony from anyone about a DOC warrant. The reference was made in argument and the jury was instructed that the “lawyers statements are not evidence” and that they “must disregard any remark, statement, or argument that is not supported by the evidence...” CP 22. The jury is presumed to have followed the court’s instruction. *State v. Mak*, 105 Wn.2d 692, 702, 718 P.2d 407 (1986). In sum, the statement was not so seriously prejudicial as to deny Ramos a fair trial. It cannot be said that no reasonable judge would have denied the motion for mistrial in this case.

In support of his argument that the court abused its discretion, Ramos relies on a 1937 case, *State v. Smith*, 189 Wash. 422, 65 P.2d 1075 (1937). Appellant’s Brief at 9. In that case, the jury learned, through

improper cross examination, that the defendant had left the Marine Corps by means other than an honorable discharge -- he deserted. *Id.* at 426-7. The facts of Smith are distinguishable from the facts in Ramos' case. Here, the jury already knew Ramos had a warrant for his arrest and from the video, they knew that the officer told him it was a "DOC pickup." The prosecutor, on one occasion, referred to the warrant as a DOC warrant, without any further explanation. No one testified or explained what the acronym "DOC" stands for and no one told the jury why Ramos had a DOC warrant.

Ramos also relies on the 1931 case of *State v. Tweety*, 165 Wash. 281, 5 P.2d 335, 338 (1931). *Tweety* is also distinguishable from the case at hand. In *Tweety*, the prosecutor repeatedly tried to get in hearsay evidence that an intended defense witness was in jail. *Id.* at 286-7. Even after two objections were sustained by the trial court, the prosecutor asked a third time. *Id.* at 287. Here, the prosecutor did not repeatedly violate the court's motion in limine by getting into the record evidence that would otherwise be inadmissible. The evidence was already admitted that Ramos had a "DOC pickup." SE 10. The court simply did not want counsel or witnesses to refer to it as a "DOC warrant." RP 140, 142. After the objection was sustained, there were no further references to "DOC."

Finally, Ramos relies on the 1937 case of *State v. O'Donnell*, 191 Wash. 511, 71 P.2d 571 (1937). In that case, the prosecutor, in opening statement, told the jury that the defendants have records for burglary and robbery, and have served time in penitentiaries. *Id.* at 513. These facts are clearly distinguishable from Ramos' case. Here, no one heard about Ramos' prior record. In Ramos' case, the prosecutor had to prove that an assault occurred while officers were performing their official duties. CP 26. In this case, the officer's official duty was arresting Ramos on a warrant. So, there was no way to avoid testimony that Ramos had a warrant. Furthermore, Ramos claimed he did not know that Officer Hipner was a law enforcement officer. The COBAN clearly rebutted his claim because she immediately told him he had a warrant. And while the trial court did not want the DOC warrant to be emphasized by the witnesses or the trial counsel, the fact was already admitted at trial. *See* SE 10. It cannot be said that the prosecutor's reference of evidence already admitted created the type of prejudice such that nothing short of a new trial will insure that the defendant receives a fair trial. *See State v. Rodriguez*, 146 Wn.2d 260, 270, 45 P.3d 541 (2002); *State v. Thompson*, 90 Wn. App. 41, 47, 950 P.2d 977 (1998).

C. The DNA fee should be stricken because DNA was previously collected.

The State's records show that DNA was previously collected for Ramos. Therefore, the State agrees to strike the \$100 DNA collection fee.

IV. CONCLUSION

Based on the above arguments, the State asks this court to affirm Ramos' conviction and sentence and strike the \$100 DNA fee.

Respectfully submitted this 29th day of March, 2019,

s/Tamara A. Hanlon
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Deputy Prosecuting Attorney

DECLARATION OF SERVICE

I, Tamara A. Hanlon, state that on March 29, 2019, via the portal, I emailed a copy of BRIEF OF RESPONDENT to Marie Trombley. I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 29th day of March, 2019 at Yakima, Washington.

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March 29, 2019 - 4:55 PM

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