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NO. 36504-2-III

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION THREE

STATE OF WASHINGTON,

Respondent,

v.

DEMETRIUS ROBINSON,
Appellant.

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

The Honorable John D. Frazier, Judge

BRIEF OF APPELLANT

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TABLE OF CONTENTS

	Page
A. ASSIGNMENTS OF ERROR.....	1
Issues Presented on Appeal.....	1
B. STATEMENT OF THE CASE.....	2
Substantive Facts.....	2
Procedural Facts.....	6
C. ARGUMENT.....	7
1. MR. ROBINSON’S CONVICTION FOR ASSAULT IN THE FOURTH DEGREE VIOLATES THE PROHIBITION ON DOUBLE JEOPARDY BECAUSE IT IS BASED ON THE SAME ACTS UNDERLYING HIS CONVICTION FOR ASSAULT IN THE SECOND DEGREE	7
2. THE TRIAL COURT ERRED WHEN IT INSTRUCTED THE JURY ON TWO ALTERNATIVE MEANS OF COMMITTING ASSAULT IN THE SECOND DEGREE WHERE THE STATE FAILED TO PRESENT SUBSTANTIAL EVIDENCE OF ONE OF THE MEANS: THAT MR. ROBINSON ASSAULTED MR. JOHNSON WITH A DEADLY WEAPON	14
D. CONCLUSION.....	18

TABLE OF AUTHORITIES

Page

WASHINGTON CASES

<i>In re White</i> , 1 Wn. App. 2d 788, 407 P.3d 1173 (2017).....	8, 12
<i>State v. Adel</i> , 136 Wn.2d 629, 965 P.2d 1072 (1998)	7
<i>State v. Calle</i> , 125 Wn.2d 769, 888 P.2d 155 (1995)	13
<i>State v. Green</i> , 94 Wn.2d 216, 616 P.2d 628 (1980).....	17
<i>State v. Kitchen</i> , 110 Wn.2d 403, 756 P.2d 105 (1988).....	14
<i>State v. Knight</i> , 162 Wn.2d 806, 174 P.3d 1167 (2008).....	13
<i>State v. McKauge</i> , 172 Wn.2d 802, 262 P.3d 1225 (2011).....	16
<i>State v. Owens</i> , 180 Wn.2d 90, 323 P.3d 1030 (2014).....	14
<i>State v. Pomeroy</i> , 18 Wn. App. 837, 573 P.2d 805 (1977).....	16, 17
<i>State v. Smith</i> , 159 Wn.2d 778, 154 P.3d 873 (2007).....	14, 15, 17
<i>State v. Villanueva-Gonzalez</i> , 180 Wn.2d 975, 329 P.3d 78 (2014)	7, 8
<i>State v. Womac</i> , 160 Wn.2d 643, 160 P.3d 40 (2007).....	13

TABLE OF AUTHORITIES

Page

FEDERAL CASES

Dep't. of Revenue v. Kurth Ranch,
511 U.S. 767, 114 S.Ct. 1937, 128 L.Ed.2d 767 (1994) 7

RULES, STATUTES, AND OTHERS

RCW 9A.04.110 15, 17

RCW 9A.36.021 15

Wash. Const. art. I, § 21 14

A. ASSIGNMENTS OF ERROR

1. Mr. Robinson's conviction for Assault in the Fourth Degree violates the prohibition on double jeopardy because the underlying act of that assault occurred during the same course of conduct as the acts underlying his conviction for Assault in the Second Degree.

2. The trial court erred when it instructed the jury on two alternative means of committing Assault in the Second Degree and the state failed to present substantial evidence on one of the alternative means: that Mr. Robinson assaulted Mr. Johnson with a deadly weapon.

Issues Presented on Appeal

1. Does Mr. Robinson's conviction for Assault in the Fourth Degree violate the prohibition on double jeopardy when the acts underlying that conviction occurred during the same course of conduct as the acts underlying his conviction for Assault in the Second Degree?

2. Did the trial court violate Mr. Robinson's right to a unanimous jury verdict when it instructed the jury on two alternative means of committing Assault in the Second

Degree and the state failed to present substantial evidence that Mr. Robinson assaulted Mr. Johnson with a deadly weapon?

B. STATEMENT OF THE CASE

Substantive Facts

On July 7, 2018, Bright Johnson and Demetrius Robinson were spending the day by the indoor pool at the Campus Commons Apartments located in Pullman, Washington. RP 92-93. This indoor pool is located inside the apartment complex's clubhouse. RP 69. Mr. Robinson and Mr. Johnson left the pool to buy beer at a corner store and then walked to Mr. Bright's apartment at a complex called The Grove. RP 94-95. They spent time drinking by the outdoor pool at The Grove and were eventually joined by an unidentified couple and an individual named Matthew Sutherland, who is identified in the record as Mr. Robinson's friend. RP 96-97. Eventually the group walked back over to the indoor pool at the Campus Commons Apartments and spent about 30 minutes there before deciding to go to a party. RP 97-98.

The group got into Mr. Sutherland's car and he drove them to a party located on D Street in Pullman. RP 99. The group spent a

short time at the party on D Street but quickly decided to go to a different party at a house on Maple Street in Pullman. RP 101. While the group was at the house party, the homeowner asked Mr. Johnson to leave. RP 103. According to Mr. Johnson, he was not usually welcome at parties at this house and the homeowner had told him so in the past. RP 103. Mr. Johnson went outside and waited for the rest of the group to come out of the party. RP 103-04.

Mr. Robinson and Mr. Sutherland exited the party and Mr. Johnson rejoined them in Mr. Sutherland's car. RP 104-05. The group began to drive around Pullman and stop at different houses belonging to Mr. Robinson's friends. RP 107. Mr. Robinson went inside the houses to find more alcohol to bring back to the pool at the Campus Commons Apartments. RP 107. At one of the stops along the way Mr. Robinson acquired a takeout box of chow mein noodles that he had Mr. Johnson hold while he entered the houses. RP 109-10. At the third stop, Mr. Robinson found more alcohol, so Mr. Sutherland drove the group back to the indoor pool. RP 112.

Mr. Robinson had plans to meet up with his friend Madison Geidl when they got back to the pool. RP 168. Ms. Geidl was also familiar with Mr. Johnson from a party she had attended the day

before. RP 171-72. At that party, Mr. Johnson groped her and caused her to have a panic attack. RP 172. Ms. Geidl arrived at the Campus Commons pool and saw Mr. Johnson inside the poolhouse with the group who had returned from the party. RP 169.

When Ms. Geidl saw Mr. Johnson, she began to panic and returned to her car to call Mr. Robinson. RP 169. Ms. Geidl called Mr. Robinson on the phone and asked him to come out to her car. RP 169. Mr. Robinson came outside to her car and Ms. Geidl told him what Mr. Johnson had done to her the night before. RP 169. Ms. Geidl left while Mr. Robinson became visibly frustrated and went back into the poolhouse. RP 170-71.

Mr. Sutherland pointed out that while Mr. Robinson was outside with Ms. Geidl, Mr. Johnson began to eat Mr. Robinson's chow mein. RP 113-14. Mr. Robinson became angry and asked why Mr. Johnson had eaten the chow mein. RP 114. Mr. Johnson did not answer but set the chow mein down and got into the hot tub. RP 115. Mr. Robinson's phone charger fell into the pool. RP 125-26. He and Mr. Sutherland asked Mr. Johnson to get the charger from the pool because he was already wet. RP 128-29. Mr. Johnson initially refused to retrieve the charger but eventually

jumped in to get it. RP 129.

Mr. Robinson yelled at Mr. Johnson to get out of the pool. RP 132. Mr. Johnson asked what he did to make Mr. Robinson so angry, while Mr. Robinson hit and kicked Mr. Johnson from the edge of the pool. RP 131. Mr. Robinson attempted to hit Mr. Johnson with a chair, but Mr. Johnson blocked the blow with his arms. RP 135. Mr. Robinson removed his belt and began to hit Mr. Johnson with it. RP 135. After Mr. Johnson moved further into the pool, Mr. Robinson began to throw empty beer bottles at him. RP 136-38.

Mr. Johnson got out of the pool and slipped striking his head on a column. RP 139. Mr. Robinson hit and kicked Mr. Johnson while he was on the ground. RP 139. Mr. Robinson then forced Mr. Johnson's head under the pool water while Mr. Johnson struggled to get away. RP 139. Mr. Johnson eventually freed himself from Mr. Robinson's grasp and ran out of the clubhouse. RP 143.

Mr. Johnson reported the incident at the clubhouse to the Pullman Police Department. RP 148. Officers from the Pullman Police Department contacted the Campus Commons Apartments and were able to locate security camera footage that depicted parts

of the incident. Ex. 16; RP 62-63. They also contacted Mr. Johnson, who reported injuries to his ribs, jaw and eye socket. RP 149. Officers located Mr. Robinson at an apartment in Pullman and took him into custody. RP 17-18.

Procedural Facts

The state originally charged Mr. Robinson with one count of Assault in the Second Degree and alleged two alternative means: that Mr. Robinson assaulted Mr. Johnson with a deadly weapon, and that he assaulted Mr. Johnson by suffocation. CP 28. The state amended the information just before trial to add one count of Assault in the Fourth Degree based on the punches and kicks that occurred during the incident. CP 29; RP 44. Mr. Robinson proceeded to a jury trial. RP 6.

The jury found Mr. Robinson guilty of Assault in the Second Degree in count one based on suffocation but could not come to a unanimous verdict on the issue of a deadly weapon. CP 57-58. The jury also found Mr. Robinson guilty of Assault in the Fourth Degree in count two. CP 57.

The trial court sentenced Mr. Robinson to a standard range sentence of 15 months. CP 229. Mr. Robinson filed a timely notice

of appeal. CP 239.

C. ARGUMENT

1. MR. ROBINSON'S CONVICTION FOR ASSAULT IN THE FOURTH DEGREE VIOLATES THE PROHIBITION ON DOUBLE JEOPARDY BECAUSE IT IS BASED ON THE SAME ACTS UNDERLYING HIS CONVICTION FOR ASSAULT IN THE SECOND DEGREE

The principle of double jeopardy prohibits courts from imposing multiple punishments for the same offense. *State v. Villanueva-Gonzalez*, 180 Wn.2d 975, 980, 329 P.3d 78 (2014) (citing *Dep't. of Revenue v. Kurth Ranch*, 511 U.S. 767, 769 n. 1, 114 S.Ct. 1937, 128 L.Ed.2d 767 (1994)). Double jeopardy claims are reviewed de novo. *Villanueva-Gonzalez*, 180 Wn.2d at 979-80.

When a defendant has multiple convictions under the same statutory provision, courts apply the "unit of prosecution" test to analyze claims of double jeopardy. *Villanueva-Gonzalez*, 180 Wn.2d at 980-81 (citing *State v. Adel*, 136 Wn.2d 629, 634, 965 P.2d 1072 (1998)). When analyzing a double jeopardy claim under this test, courts must determine whether the punishable act is each of the defendant's separate actions, or their entire course of conduct. *Adel*, 136 Wn.2d at 634.

Assault is considered a course of conduct crime to avoid the risk of a defendant “being convicted for every punch thrown in fistfight.” *Villanueva-Gonzalez*, 180 Wn.2d at 985. Thus, a defendant cannot be convicted for two separate assaults when the acts underlying those convictions are part of a single course of conduct. *In re White*, 1 Wn. App. 2d 788, 797-98, 407 P.3d 1173 (2017).

Determining whether an assault constitutes a single course of conduct or separate acts requires the court to consider five factors: (1) the length of time over which the assaultive acts took place, (2) whether the assaultive acts took place at the same location, (3) the defendant’s intent or motivation for the different assaultive acts, (4) whether the acts were uninterrupted or whether there were intervening acts or events, and (5) whether there was an opportunity for the defendant to reconsider his or her actions. *Villanueva-Gonzalez*, 180 Wn.2d at 985.

When applied to the evidence presented at Mr. Robinson’s trial, these factors suggest that his actions toward Mr. Johnson constitute a single course of conduct, meaning he received multiple punishments for the same offense in violation of the prohibition on

double jeopardy.

The first two factors weigh in favor of finding that Mr. Robinson's actions during the early-morning hours of July 8, 2018 constitute a single course of conduct. The record establishes that the video depicting the events at issue was recorded between 5:40 and 5:52 a.m. on July 8, 2018. RP 129-30, 143. Thus, Mr. Robinsons' interactions with Mr. Johnson in the clubhouse lasted a maximum of 12 minutes, and some of that time was taken up by the discussion of Mr. Robinson's phone charger in the pool and Mr. Johnson eating some of the chow mein. Addressing the second factor, it is undisputed that the acts forming the basis for both assault charges occurred in the clubhouse at the Campus Commons Apartments. RP 112.

The third factor to analyze in this case is Mr. Robinson's motivation for the assaultive acts. The record demonstrates that Mr. Robinson had the same motive for all the assaultive acts carried out against Mr. Johnson. Before arriving back at the clubhouse, Mr. Robinson and Mr. Johnson had spent the day together drinking, spending time by the pool, and attending parties. RP 92-98.

Mr. Robinson did not become aggressive toward Mr.

Johnson until after he had been told that Mr. Johnson had groped Ms. Geidl the night before. RP 169-71. At that point, Mr. Robinson also learned Mr. Johnson had been eating the chow mein and his attitude toward Mr. Johnson turned from friendly to hostile after Ms. Geidl revealed the groping and Mr. Robinson discovered that Mr. Johnson ate his chow mein RP 124. Mr. Robinson's motivation in assaulting Mr. Johnson was based on Mr. Johnson groping Ms. Geidl.

The final two factors to consider are whether the acts were uninterrupted or separated by intervening events, and whether the defendant had the opportunity to reconsider their actions. The record in this case reveals one continuous course of assaultive conduct that began when Mr. Robinson hit Mr. Johnson until Mr. Johnson managed to run out of the clubhouse. During this time, there was no opportunity for Mr. Robinson to reconsider his actions.

The first instance of physical contact between Mr. Robinson and Mr. Johnson was a kick that occurred when Mr. Johnson was attempting to retrieve Mr. Robinson's phone charger from the pool. RP 131. As Mr. Johnson moved away from the edge of the pool, Mr. Robinson continued the same assault by hitting Mr. Johnson

with a belt. RP 135. Eventually Mr. Johnson was so far from the edge of the pool that Mr. Robinson resorted to throwing chairs and bottles toward Mr. Johnson. RP 135-37. At that point, Mr. Johnson got out of the pool and Mr. Robinson continued to punch him and ultimately pushed his head under the water before Mr. Johnson was able to run out of the clubhouse. RP 139.

Although Mr. Robinson's assaultive conduct took different forms, it all was part of a single assault on Mr. Johnson. There was no intervening event that separated one assaultive act from the others, and even the momentary pauses in the assault were only because Mr. Johnson was out of Mr. Robinson's reach.

The state charged Mr. Robinson as if he carried out two separate assaults against Mr. Johnson. It charged him with Assault in the Fourth Degree for punching and kicking Mr. Johnson and charged Assault in the Second Degree for the alleged suffocation. CP 28-29. However, the record shows that Mr. Robinson punched and kicked Mr. Johnson during the course of the alleged suffocation. RP 131, 139. There were no separations in time or in motive during the continuing course of conduct. The state failed to establish any meaningful distinction between the assaultive acts

forming the basis of its multiple charges against Mr. Robinson.

The facts of this case are analogous to those analyzed in *White*. In that case, the defendant got into an altercation with his girlfriend. *White*, 1 Wn. App. 2d at 790. During the assault, the defendant pointed a gun at his girlfriend and strangled her. *White*, 1 Wn. App. 2d at 790-91. The jury convicted the defendant of two counts of Assault in the Second Degree based on these acts. *White*, 1 Wn. App. 2d at 791. On appeal, the defendant argued that punishing him for two counts of Assault in the Second Degree violated the prohibition on double jeopardy because both acts were part of one continuous course of conduct. *White*, 1 Wn. App. 2d at 793-94.

The Court of Appeals agreed with the defendant and reversed his second conviction for Assault in the Second Degree. *White*, 1 Wn. App. 2d at 797-98. The court held that “[t]he acts underlying White’s convictions occurred in the same place, within a short period of time, in an uninterrupted series, with the stated intent of killing [the victim], and in response to [the victim’s] statement that she would pursue litigation if they could not agree on a parenting plan.” *White*, 1 Wn. App. 2d at 797-98.

These same circumstances were present in Mr. Robinson's case. The acts underlying both charges against Mr. Robinson occurred in the same place, within a short period of time, in an uninterrupted series, and with the same intent of punishing Mr. Johnson for allegedly groping Ms. Geidl. Both assaultive acts were part of the same course of conduct, therefore sentencing Mr. Robinson for both assaults violates the constitutional prohibition on double jeopardy. This is true even if Mr. Robinson's conviction for Assault in the Fourth Degree has no impact on his sentence because a conviction constitutes "punishment" for double jeopardy purposes regardless of its impact at sentencing. *State v. Womac*, 160 Wn.2d 643, 656-58, 160 P.3d 40 (2007) (citing *State v. Calle*, 125 Wn.2d 769, 773, 888 P.2d 155 (1995)).

The appropriate remedy for a double jeopardy violation is to vacate the offending convictions. *State v. Knight*, 162 Wn.2d 806, 810, 174 P.3d 1167 (2008) (citing *Womac*, 160 Wn.2d at 658-60. Mr. Robinson's conviction and sentence for Assault in the Fourth Degree and Assault in the Second Degree based on the same course of conduct violate the prohibition on double jeopardy because they punish Mr. Robinson twice for the same offense. This

court should vacate his conviction for Assault in the Fourth Degree.

2. THE TRIAL COURT ERRED WHEN IT INSTRUCTED THE JURY ON TWO ALTERNATIVE MEANS OF COMMITTING ASSAULT IN THE SECOND DEGREE WHERE THE STATE FAILED TO PRESENT SUBSTANTIAL EVIDENCE OF ONE OF THE MEANS: THAT MR. ROBINSON ASSAULTED MR. JOHNSON WITH A DEADLY WEAPON

The right to a unanimous jury verdict is a fundamental protection afforded to criminal defendants in Washington State. *State v. Smith*, 159 Wn.2d 778, 783, 154 P.3d 873 (2007) (citing Wash. Const. art. I, § 21). When a defendant is charged with a crime for which there are alternative means of committing the offense, to satisfy the requirement for jury unanimity, the state must present substantial evidence of each alternative means. *Smith*, 159 Wn.2d at 783 (citing *State v. Kitchen*, 110 Wn.2d 403, 410-11, 756 P.2d 105 (1988)). In evaluating whether the state presented “substantial evidence,” courts employ the same test used to analyze the sufficiency of evidence: whether any rational trier of fact could find the essential elements of the crime beyond a reasonable doubt. *State v. Owens*, 180 Wn.2d 90, 99, 323 P.3d 1030 (2014).

Assault in the second degree is an alternative means crime. RCW

9A.36.021(1). *Smith*, 159 Wn.2d at 784. In relevant part, a person commits Assault in the Second Degree if the person assaults another person and

(a) Intentionally assaults another and thereby recklessly inflicts substantial bodily harm; or

....

(c) Assaults another with a deadly weapon; or

.....

(g) Assaults another by strangulation or suffocation.

RCW 9A.36.021.

In this case, the trial court instructed the jury on two alternative means of committing Assault in the Second Degree: assault with a deadly weapon (c) and assault by suffocation (g). CP 84. However, the state failed to present substantial evidence that Mr. Robinson assaulted Mr. Johnson with a deadly weapon.

An item is a deadly weapon if, under the circumstances in which it is used, it is readily capable of causing death or substantial bodily harm. RCW 9A.04.110(6). "Substantial bodily harm" is defined as "bodily injury which involves a temporary but substantial disfigurement, or which causes a temporary but substantial loss or impairment of the function of any bodily part or organ, or which causes a fracture of any bodily part or organ." RCW

9A.04.110(4)(b). The degree of harm required to satisfy the “substantial bodily harm” standard is “considerable and necessarily requires a showing greater than an injury merely having some existence.” *State v. McKauge*, 172 Wn.2d 802, 806, 262 P.3d 1225 (2011).

In its attempt to prove that Mr. Robinson assaulted Mr. Johnson with a deadly weapon, the state relied on evidence showing that Mr. Robinson threw two empty beer bottles at Mr. Johnson while he was in the pool. RP 136-37, 234-35.

In *State v. Pomeroy*, 18 Wn. App. 837, 844, 573 P.2d 805 (1977), the court held that Pomeroy, when a defendant intentionally uses or breaks a bottle to create a jagged deadly edge, this broken can constitute a deadly weapon. In *Pomeroy*, the defendant broke a beer glass to give it a sharp, jagged edge before thrusting it into the victim’s face. *Pomeroy*, 18 Wn. App. at 843. The victim’s injuries required the removal of one of his eyes. *Pomeroy*, 18 Wn. App. at 843. The Court of Appeals held that the bottle could constitute a deadly weapon based on the manner in which the defendant used it. *Pomeroy*, 18 Wn. App. at 843-44. The Court did not hold that the beer bottle was a “per se” deadly weapon. Rather, the act of

creating a sharp edged weapon transformed the beer bottle from an ordinary bottle into a deadly weapon when used to inflict harm on a person. *Pomeroy*, 18 Wn. App. at 844.

In this case, Mr. Robinson never broke the bottles to make them more dangerous, and never hit or stabbed Mr. Johnson with the bottles. Rather, he threw them at Mr. Johnson in the pool and one hit him in the arm. RP 137. The fact that Mr. Johnson was in the water made it highly unlikely that the bottles would have broken and the impact only caused momentary pain and some bruising. RP 137-38.

These facts distinguish this case from the circumstances present in *Pomeroy*, and the bottles do not constitute deadly weapons under RCW 9A.04.110(6) because they were created to be deadly weapons. In this case, Mr. Robinson was denied his constitutional right to jury unanimity because there was insufficient evidence of an assault with a deadly weapon. *Smith*, 159 Wn.2d at 783.

The remedy for this violation is to reverse the defendant's convictions and remand for a new trial. *State v. Green*, 94 Wn.2d 216, 235, 616 P.2d 628 (1980). This court should reverse Mr.

Robinson's conviction for Assault in the Second Degree and remand for a new trial.

D. CONCLUSION

Mr. Robinson's conviction for Assault in the Fourth Degree violates the constitutional prohibition on double jeopardy because he was punished twice for the same underlying acts. This court should reverse his conviction for Assault in the Fourth Degree.

Furthermore, Mr. Robinson's right to a unanimous jury verdict was violated when the state failed to present substantial evidence that Mr. Robinson assaulted Mr. Johnson with a deadly weapon. For this reason, Mr. Robinson's conviction for Assault in the Second Degree should be reversed and the case remanded for a new trial.

DATED this 19th day of June 2019.

Respectfully submitted,



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I, Lise Ellner, a person over the age of 18 years of age, served the Whitman County Prosecutor's Office denist@co.whitman.wa.us and amandap@co.whitman.wa.us and Demetrius Robinson, 2316 67th Avenue NE, Tacoma, WA 98422 a true copy of the document to which this certificate is affixed on June 19, 2019. Service was made by electronically to the prosecutor and Demetrius Robinson by depositing in the mails of the United States of America, properly stamped and addressed.

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