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Court of Appeals
Division III
State of Washington
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No. 36582-4-III

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

STATE OF WASHINGTON,

Respondent,

v.

RICHARD JAMES ROBERTS

Appellant.

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

The Honorable Kevin Naught

APPELLANT'S OPENING BRIEF

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A. SUMMARY OF ARGUMENT

After a jury trial, Richard J. Roberts was convicted of one count of felony harassment of another—threat to kill.

During closing and rebuttal closing the State referred to facts not in evidence and vouched for the victim witness. Because the case hinged on the credibility of its witnesses, the State’s misconduct resulted in incurable prejudice. The case should be reversed and remanded for a new trial.

B. ASSIGNMENTS OF ERROR

1. The State committed misconduct by referring to facts not in evidence.
2. The State committed misconduct by vouching for the victim witness.

C. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR

Issue 1: Whether the State committed misconduct that was prejudicial and incurable by referring to facts not in evidence and vouching for the credibility of the victim witness.

- a. The State improperly referred to facts not in evidence, creating incurable prejudice.
- b. The State improperly vouched for the victim witness, thereby creating incurable prejudice.

D. STATEMENT OF THE CASE

On October 18, 2017, Tammy Chadek was receiving medical care at a Yakima hospital after suffering a stroke. (RP 218-222, 238-239, 335-337). Upset by some comments made to her by her treating physician, Ms. Chadek contacted her partner, Richard J. Roberts, asking that he come get her and bring her home.

(RP 336-337). Mr. Roberts contacted the hospital to complain about the care Ms. Chadek was receiving. (RP 320, 322-326).

Adam Frankovic, a nursing supervisor with the hospital, received two phone calls from Mr. Roberts. (RP 216-217, 244). After the first phone call, Mr. Frankovic notified local law enforcement because the caller made several threats, which included threats to shoot up the hospital, blow up the hospital, kill Mr. Frankovic, and blow the doctor's head off. (RP 216-218). Later it was confirmed Mr. Roberts called the hospital, though accounts of the conversation's content differed. (RP 216-218, 321-326).

The State charged Mr. Roberts with two counts of felony harassment of another—threat to kill. (CP 8; RP 12-13). Count 1 of the Information, felony harassment of another—threat to kill, alleged Mr. Frankovic was the victim. (CP 8). Count 2 alleged the same charge, but Pamela Hunter was the victim. (CP 8; RP 12-13).

Before trial, the State successfully moved to dismiss Count 2, involving the alleged victim Ms. Hunter, for medical reasons. (CP 2, 100; RP 12-13). The defense moved to exclude Ms. Hunter as a witness; the State agreed, and the trial court granted the motion. (RP 27-28).

The case proceeded to a jury trial. (RP 214-345). At trial the testimony of witnesses differed as to what happened on the phone call. (RP 216-217, 323-326).

Mr. Frankovic testified consistent with the facts above. (RP 214-258). He stated after he hung up from the first phone call, he put the hospital in lockdown in addition to contacting law enforcement. (RP 217). He then went to speak to Ms. Chadek in her room, who expressed concern over the way a doctor addressed her. (RP 225-226). Mr. Frankovic informed her that Mr. Roberts had called and threatened the hospital and he was not allowed on the premises. (RP 226). Mr. Frankovic testified he later received a second phone call:

So on the second call, when I got up to the ACU unit after putting the hospital on lockdown, I was handed a phone. It went from Pam, who's the monitor tech to the ACU charge nurse, who didn't say anything and handed it to me.

(RP 244). Threats similar to those of the first phone call were made during the second call. (RP 244).

Mr. Frankovic also testified he never had physical or in-person contact with Mr. Roberts. (RP 233-234). He never saw Mr. Roberts with a gun, no explosives were found at the hospital, no shots were fired inside or outside of the hospital, Mr. Roberts never tried to shoot Mr. Frankovic nor come to the hospital, and Mr. Frankovic had never met Mr. Roberts. (RP 234-235, 242-243).

An officer with the Yakima Police Department also testified at trial. (RP 258-269). He arrived at the hospital in response to Mr. Frankovic's request for law enforcement, and contacted Mr. Roberts by phone. (RP 261-262). The officer stated Mr. Roberts was agitated on the phone, that Mr. Roberts voiced

concern about his partner Ms. Chadek, and that Mr. Roberts was concerned officers were going to arrive at his residence. (RP 262). Mr. Roberts denied plans to harm anyone and gave the officer his address. (RP 262-263).

This first Yakima officer also testified Mr. Roberts was at home when law enforcement arrived—the same address he voluntarily provided. (RP 265). Mr. Roberts made no known additional phone calls to the hospital while law enforcement was present. (RP 266). None of the officer’s testimony indicated Mr. Roberts had a firearm or explosives when contacted by law enforcement. (RP 266). Furthermore, the officer acknowledged Mr. Roberts contacted 911, and while he expressed discontent and concern for Ms. Chadek during the call, Mr. Roberts never threatened the 911 dispatch. (RP 261, 267).

A second Yakima officer testified, and he assisted in the arrest of Mr. Roberts at his residence. (RP 269-281). He testified Mr. Roberts immediately came to the door of his residence when the officers arrived and came outside the home as requested, and Mr. Roberts denied any wrongdoing when arrested. (RP 273). He also took a statement from Mr. Roberts, wherein Mr. Roberts explained that when he called the hospital he was trying to “go to their heads to get their jobs taken away” and Mr. Roberts again adamantly denied he had done anything wrong. (RP 273-274, 278). This second officer acknowledged Mr. Roberts never threatened to shoot or harm the officer, and expressed his concern for Ms.

Chadek's care at the hospital. (RP 278). While making his statement, Mr. Roberts never denied calling the hospital and speaking with someone. (RP 279).

A third Yakima officer testified; he was also present during Mr. Roberts' arrest. (RP 282-289). He admitted no weapons were found on Mr. Roberts' person, and there was no reason to search Mr. Roberts' home for firearms. (RP 288-289).

During trial the State indicated it wanted to recall Mr. Frankovic to provide testimony regarding Ms. Hunter's involvement in the case. (RP 301-305). As noted above, earlier testimony indicated Ms. Hunter took a phone call from Mr. Roberts. (RP 244, 302). The State expressed concerns the defense would use the absence of her testimony to its favor, and argue the absence of her testimony indicated the phone calls were not that threatening, thereby harming the State's case against Mr. Roberts. (RP 301-305). Defense counsel pointed out Ms. Hunter's testimony had been excluded. (RP 303). Ultimately, the parties agreed not to refer to Ms. Hunter or her absence at trial. (RP 305).

On behalf of the defense, Marie Holestine testified. (RP 315-332). Ms. Holestine testified she had known Mr. Roberts and Ms. Chadek for a long time, and they were good friends. (RP 315-316). On the night of the incident, Ms. Holestine was in Mr. Roberts and Ms. Chadek's home, helping clean to prepare for Ms. Chadek's return from the hospital. (RP 316-317). While Ms. Holestine was present, Ms. Chadek called Mr. Roberts. (RP 318). Ms. Chadek was in tears.

(RP 318, 320). Ms. Chadek's call was on speaker phone, and Ms. Holestine heard the distress in Ms. Chadek's voice. (RP 320). Ms. Chadek explained the doctor was being mean to her, and had been disrespectful about her speech impairment. (RP 320). This upset and concerned Mr. Roberts, who had no transportation to get to the hospital. (RP 320-321). Ms. Holestine stated Mr. Roberts called 911 to report the hospital's treatment. (RP 321). Mr. Roberts also called the hospital while the phone was on speaker. (RP 321-323). And while Ms. Holestine heard Mr. Roberts yell at times when on the phone to the hospital, she never once heard him threaten to blow anyone or anything up, shoot anyone, nor harm anyone. (RP 323, 325-326). Ms. Holestine was certain of what she heard. (RP 323-324). She stated she did, however, hear Mr. Roberts threaten to have the hospital staff's jobs taken away. (RP 324). She also testified Mr. Roberts did not have a gun. (RP 326).

Finally, Ms. Chadek testified. (RP 333-345). She stated she and Mr. Roberts had been together for seven years, and that on the date of the incident she had a stroke. (RP 334). When the treating physician interviewed her in her room, she stated she thought he was being rude in the way he communicated with her. (RP 336-337, 339). This upset Ms. Chadek and prompted her to contact Mr. Roberts and ask him to come pick her up from the hospital, which he was unable to do. (RP 337-338).

During closing argument, the State made the following comment when recounting the threats alleged:

[Mr. Frankovic] was very specific in the language he quoted. His assistant had received those threats.

(CP 2¹; RP 384). Defense counsel did not object. (RP 384).

The State also made the following comments during closing and rebuttal closing:

Why would [Mr. Frankovic] take the stand and testify under oath that that's what Mr. Roberts said to him back on September [sic] 18, 2017?

(RP 384).

...

Was [Mr. Frankovic] intentionally not telling the truth when he called the police department that evening when he came up and testified under oath?

(RP 385).

...

I can't understand why he would say those things unless they were true is what I'm arguing to you.

(RP 386).

...

¹ While the probable cause affidavit includes information alleging Ms. Hunter was threatened on the phone by Mr. Roberts, this information was not presented at trial. (RP 244).

What makes a lot of sense and he was telling the truth. He didn't have a motive not to tell the truth.

(RP 406).

Defense counsel did not object. (RP 384-386, 406).

The jury found Mr. Roberts guilty of felony harassment of another—threat to kill. (CP 107; 1RP 418).

Mr. Roberts timely appealed. (CP 135).

E. ARGUMENT

Issue 1: Whether the State committed misconduct that was prejudicial and incurable by referring to facts not in evidence and vouching for the credibility of the victim witness.

In its closing and rebuttal closing argument, the State committed misconduct by referring to facts not in evidence and vouching for the credibility of the victim witness. The misconduct was prejudicial and incurable, and therefore, requires a new trial.

“To prevail on a claim of prosecutorial misconduct, the defendant must establish that the prosecutor's conduct was both improper and prejudicial in the context of the entire record and the circumstances at trial.” *State v. Thorgerson*, 172 Wn.2d 438, 442, 258 P.3d 43 (2011) (internal quotation marks omitted) (*quoting State v. Magers*, 164 Wn.2d 174, 191, 189 P.3d 126 (2008)); *see also State v. Emery*, 174 Wn.2d 741, 759, 278 P.3d 653 (2012) (when raising

prosecutorial misconduct, the appellant “must first show that the prosecutor's statements are improper.”).

If the defendant fails to properly object to the misconduct, “a defendant cannot raise the issue of prosecutorial misconduct on appeal unless the misconduct was so flagrant and ill intentioned that no curative instruction would have obviated the prejudice it engendered.” *State v. O’Donnell*, 142 Wn. App. 314, 328, 174 P.3d 1205 (2007) (internal quotation marks omitted) (*quoting State v. Munguia*, 107 Wn. App. 328, 336, 26 P.3d 1017 (2001)). “Under this heightened 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.’” *Emery*, 174 Wn.2d at 761 (quoting *Thorgerson*, 172 Wn.2d at 455). “Reviewing courts should focus less on whether the prosecutor's misconduct was flagrant or ill intentioned and more on whether the resulting prejudice could have been cured.” *Id.* at 762.

a. The State improperly referred to facts not in evidence, creating incurable prejudice.

It is error for a prosecutor to present, during closing argument, facts not admitted as evidence during trial. *In re Pers. Restraint of Glasmann*, 175 Wn.2d 696, 704–06, 286 P.3d 673 (2012). “The long-standing rule is that consideration of any material by a jury not properly admitted as evidence vitiates a verdict when

there is a reasonable ground to believe that the defendant may have been prejudiced.” *Id.* at 705 (citations and quotations omitted). In *Glasmann*, the Court found that a prosecutor’s modifications to a booking photograph, which added in captions, was the “equivalent of unadmitted evidence.” *Id.* at 706. The Court found the conduct was flagrant and ill-intentioned. *Id.* at 707 (also finding cumulative effect of prosecutor’s misconduct was prejudicial).

A prosecuting attorney has some latitude to argue facts and inferences from the evidence, but it is improper to bolster a witness's credibility with facts not in evidence. *State v. Jones*, 144 Wn. App. 284, 293–94, 183 P.3d 307 (2008).

In this case, the State and defense agreed not to pursue testimony regarding Ms. Hunter and her role during the alleged phone calls. (RP 301-305). Additionally, the defense agreed it would not pursue a defense strategy of pointing out the absence of the witness, and thus would not use such information to argue the phone calls to the hospital were not credible threats since she was not testifying. (RP 301-305). The State approved of this stipulation. (RP 304-305). However, despite knowing this prohibition, the State pointed out to the jury during closing argument Ms. Hunter had been threatened on the phone. (RP 384). Defense counsel never was given the chance to interview Ms. Hunter, and her testimony was excluded by the trial court. (RP 27-28, 303). Yet the State presented evidence that had never been testified to—that Ms. Hunter had been threatened. (RP 384). At trial, there was merely testimony acknowledging Ms.

Hunter had passed the phone to Mr. Frankovic. (RP 244). But this same testimony did not explain that Ms. Hunter had been threatened on the phone. (RP 244). Moreover, the defendant was never able to interview Ms. Hunter and her testimony was specifically excluded from trial. (RP 28). The State's presentation of the threats to Ms. Hunter were improper and constituted misconduct. *Glasman*, 175 Wn.2d at 705 (improper to argue facts not in evidence). The State used the unadmitted facts to bolster Mr. Frankovic's testimony, which was also improper. *Jones*, 144 Wn. App. at 293-94.

The State's comment on the unadmitted facts also prejudiced Mr. Roberts. Ms. Holestine was the only third party to overhear the phone call between Mr. Frankovic and Mr. Roberts. (RP 323, 325-326). The only evidence to prove the crime was Mr. Frankovic's testimony alleging Mr. Roberts threatened him over the phone. (RP 216-218). This case was a credibility contest between Ms. Holestine and Mr. Frankovic, and the case was based solely on the credibility of its witnesses. When a case is largely a credibility contest, a prosecutor's improper arguments can easily serve as the deciding factor. *State v. Walker*, 164 Wn. App. 724, 738, 265 P.3d 191 (2011). Further, "trained and experienced prosecutors presumably do not risk appellate reversal of a hard-fought conviction by engaging in improper trial tactics unless the prosecutor feels that those tactics are necessary to sway the jury in a close case." *State v. Fleming*, 83 Wn. App. 209, 215, 921 P.2d 1076 (1996). The State's evidence was not overwhelming. Only Mr.

Frankovic, Mr. Roberts, and Ms. Holestine could hear what was said on the phone calls, several factors indicated Mr. Roberts had no intention of carrying out any alleged threats (no guns or no explosives found in his home, at the hospital, or on his person, denial of intent to harm anyone, and no threats made to the 911 dispatch), and Ms. Holestine denied that Mr. Roberts made any threats on the phone. (RP 216-218, 234-235, 242-243, 262-263, 261, 267, 288-289, 323, 325-326). Therefore, the prosecutor's comments had a substantial likelihood of affecting the jury verdict.

The State's misconduct "was so flagrant and ill intentioned that no curative instruction would have obviated the prejudice it engendered." *O'Donnell*, 142 Wn. App. at 328 (quoting *Munguia*, 107 Wn. App. at 336); see also *Emery*, 174 Wn.2d at 761 (quoting *Thorgerson*, 172 Wn.2d at 455). No curative instruction would have alleviated the belief in the jurors' minds that because it was alleged Mr. Roberts threatened two people, the allegations by Mr. Frankovic were true. The error was incurable, given the fact that the case hinged upon the credibility of the two witnesses (Mr. Frankovic and Ms. Holestine) and the evidence of Mr. Roberts' guilt was not overwhelming.

The State committed misconduct in its closing arguments that was prejudicial and incurable, by referring to facts not in evidence. This Court should reverse his convictions and remand for a new trial.

b. The State improperly vouched for the victim witness, thereby creating incurable prejudice.

During closing and rebuttal closing argument, the State vouched several times for Mr. Frankovic’s credibility. The vouching created an incurable prejudice, and Mr. Roberts should be granted a new trial.

“It is misconduct for a prosecutor to state a personal belief as to the credibility of a witness.” *State v. Warren*, 165 Wn.2d 17, 30, 195 P.3d 940 (2008) (citations omitted); *see also State v. Dhaliwal*, 150 Wn.2d 559, 577–78, 79 P.3d 432 (2003). Improper vouching for a witness’ credibility occurs “if a prosecutor expresses his or her personal belief as to the veracity of the witness” *State v. Ish*, 170 Wn.2d 189, 196, 241 P.3d 389 (2010). A prosecutor also improperly vouches for the credibility of a witness by stating a witness is telling the truth. *State v. Ramos*, 164 Wn. App. 327, 341 n.4, 263 P.3d 1268 (2011) (finding the prosecutor improperly vouched for the credibility of witnesses by arguing they “were just telling you what they saw and they are not being anything less than 100 percent candid”); *also State v. Christopher*, No. 45694-0-II, 2015 WL 427884, at *9 (Wash. Ct. App. Aug. 4, 2015) (statement that witness “was under oath and *he was telling truths*” was impermissible vouching) (emphasis in original); *see also* GR 14.1(a) (authorizing citation to unpublished opinions of the Court of Appeals filed on or after March 1,

2013, as nonbinding authority). “Whether a witness has testified truthfully is entirely for the jury to determine.” *Ish*, 170 Wn.2d at 196 (citing *United States v. Brooks*, 508 F.3d 1205, 1210 (9th Cir. 2007)). “A prosecutor owes a defendant a duty to ensure the right to a fair trial is not violated.” *Ramos*, 164 Wn. App. at 333 (citation omitted). As noted above, the State made the following comments during closing and rebuttal closing:

Why would [Mr. Frankovic] take the stand and testify under oath that that’s what Mr. Roberts said to him back on September [sic] 18, 2017?

(RP 384).

...

Was [Mr. Frankovic] intentionally not telling the truth when he called the police department that evening when he came up and testified under oath?

(RP 385).

...

I can’t understand why he would say those things unless they were true is what I’m arguing to you.

(RP 386).

...

What makes a lot of sense and he was telling the truth. He didn’t have a motive not to tell the truth.

(RP 406).

These statements were improper and misconduct because they were expressions of personal belief as to the credibility of Mr. Frankovic. Read together, the statements indicate an expression of the State's personal belief in Mr. Frankovic's truthfulness. The State repeatedly emphasized Mr. Frankovic was under oath during his testimony, and the State also followed those comments up with the assertion that Mr. Frankovic was "telling the truth." (RP 384-386, 406). This conduct was improper.

Moreover, the improper vouching prejudiced the defendant's right to a fair trial by encroaching upon the jury's decision-making authority. *Ish*, 170 Wn.2d at 196 ("[w]hether a witness has testified truthfully is entirely for the jury to determine"). The case was substantially based on the credibility of Mr. Frankovic and Ms. Holestine. The jury may have believed Ms. Holestine's testimony that Mr. Roberts did not make any threats over the phone. (RP 323, 325-326). The State's comment misled the jury, as the comment essentially eroded away at the jury's role of determining guilt. *Ish*, 170 Wn.2d at 196.

While defense counsel did not object to the prosecutor's improper statements, no curative instruction would have neutralized the comments the prosecutor made to the jury. (RP 384-386, 406). As argued above, the

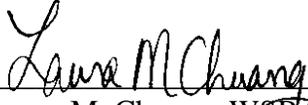
prejudice interfered with the jury's ability to determine the credibility of Mr. Frankovic versus Ms. Holestine. (*See Issue 1a*).

Mr. Roberts respectfully requests the case be remanded for a new trial.

F. CONCLUSION

The State committed misconduct by referring to facts not in evidence and vouching for the victim witness's credibility. The misconduct resulted in incurable prejudice and the case should be remanded for a new trial.

Respectfully submitted this 26th day of July, 2019.



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Jill S. Reuter, WSBA #38374

COURT OF APPEALS
DIVISION III
OF THE STATE OF WASHINGTON

STATE OF WASHINGTON) COA No. 36582-4-1-III
Plaintiff/Respondent)
vs.) Yakima Co. No. 17-1-02065-39
)
RICHARD JAMES ROBERTS,) PROOF OF SERVICE
Defendant/Appellant)
_____)

I, Jill S. Reuter, assigned counsel for the Appellant herein, do hereby certify under penalty of perjury that on July 26, 2019, I deposited for mailing by U.S. Postal Service first class mail, postage prepaid, a true and correct copy of the Appellant's opening brief to:

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Dated this 26th day of July, 2019.


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