

FILED
Court of Appeals
Division III
State of Washington
4/10/2020 3:03 PM

No. 37070-4-III
Whitman County Superior Court No. 18-1-132-38

IN THE COURT OF APPEALS
OF WASHINGTON STATE
DIVISION III

STATE OF WASHINGTON, Respondent

v.

EDWARD JON GUNN

BRIEF OF RESPONDENT

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RESTATEMENT OF THE ISSUES

- I. Was there was sufficient evidence to support the trial court's finding that Ms. Trujillo was reliable?**
- II. Was there reasonable, articulable suspicion to stop the defendant's vehicle?**

STATEMENT OF THE CASE

At a suppression hearing on September 4, 2018, Sgt. Michael Jordan of the Whitman County Sheriff's Office testified that he was on duty on June 9, 2018 and provided back up assistance to Officer Handley. VRP 1, 6, 8. As part of that assistance he performed a search of Amy Trujillo's purse and found a scale, paraphernalia, and heroin residue which led to her arrest for possession of a controlled substance. *Id.* at 8-9. Sgt. Jordan testified that Ms. Trujillo denied the scale was hers, but admitted that the heroin and needles were hers. *Id.*

Hoping to get out of trouble, she offered to provide drug information to Officer Handley who then updated Sgt. Jordan about the situation. *Id.* at 9. Sgt. Jordan then spoke with Ms. Trujillo who informed him that she had made previous arrangements that day to buy \$200.00 worth of methamphetamine from Edward Gunn that evening. *Id.* at 9-10. Sgt. Jordan told Ms. Trujillo that in exchange for her help he would not

book her into jail, and he would speak with the prosecutor about reducing her charges, but he made her no promises. *Id.* Sgt. Jordan testified that Ms. Trujillo admitted that she had purchased drugs from both Jory Smith and Edward Gunn, the Appellant in the past. *Id.* Ms. Trujillo told Sgt. Jordan that Mr. Gunn had informed her he was going to Spokane that day to pick up methamphetamine and bring it to Pullman, WA. CP at 35. Ms. Trujillo informed the officers that Mr. Gunn: 1)drove a blue Oldsmobile, 2)lived on Webb Street in Pullman, WA, and 3) had told her that he was going up to Spokane to get more methamphetamine to bring back to Pullman. *Id.* Sgt. Jordan looked up Mr. Gunn in a law enforcement database and was able to corroborate that he lived at 135 Webb Street in Pullman, WA. VRP at 15. Sgt. Jordan asked Ms. Trujillo to call, in his presence, Mr. Gunn about the arrangements for the \$200.00 buy of methamphetamine from Mr. Gunn. *Id.* at 10. Sgt. Jordan testified that he was in the front seat of the patrol car with the partition open while Ms. Trujillo, in the back seat, put the phone on speaker for the call to Mr. Gunn. *Id.* He testified that he could hear the male on the phone: 1)agree to sell Ms. Trujillo \$200.00 worth of methamphetamine, 2) reveal that he had the methamphetamine in his car, and 3) say he was at Walgreens in Moscow, but would meet her at his house. *Id.* at 10-12. Sgt. Jordan also heard the male say that he had gotten the methamphetamine from Spokane. *Id.* at 12. Sgt. Jordan

testified that during the phone call the participants used drug lingo that is generally known to those in the drug trade and law enforcement, but not the general public. *Id.* at 10, 12. He testified that he was familiar with the lingo from his training and experience, but asked her to translate the conversation into plain English. *Id.* at 12. Sgt. Jordan testified that Ms. Trujillo's translation was consistent with his understanding of the conversation and that she was honest in her translation and he found her to be credible. *Id.* at 12-13. He also testified that he has been able to apprehend criminals with the information she has provided in the past, and that in other investigations against her she had been honest with him about drug use and made statements against her penal interest. *Id.* at 13.

Sgt. Jordan testified that it is about a 15 minute drive from Moscow, ID to Pullman, WA depending on traffic. *Id.* at 15. He also testified that the 30- 45 minutes from the end of Mr. Trujillo's call to the time he was detained in his car at his residence in Pullman, would be consistent with the time it would take to conclude his business at the Moscow Walgreens and travel from there to his residence in Pullman. *Id.* Prior to the stop, Sgt. Jordan looked up Mr. Gunn's criminal history and noted it included a conviction for delivery of a controlled substance. *Id.* at 15-16.

Sgt. Jordan, with Ms. Trujillo, and Pullman Police Officers set up on Ritchie Street to watch Webb Street for Mr. Gunn's arrival in his blue Oldsmobile. The portion of Webb Street where Mr. Gunn's residence is located is a dead end street and the officers had a clear view of Webb Street from their positions on Richey Street. *Id.* at 16. After a blue Oldsmobile drove by on Webb Street Ms. Trujillo confirmed it was Mr. Gunn's vehicle and she was then released. *Id.* The Oldsmobile was stopped and Mr. Gunn was detained. *Id.* at 17.

The trial court included the police report narrative attached to the State's brief into the record, and used it and the live testimony from the hearing to make its Findings of Fact and Conclusions of Law. VRP at 5-6.

STANDARD OF REVIEW

Unchallenged findings of fact are verities on appeal and Courts review conclusions of law from suppression hearings de novo. *State v. Smith*, 165 Wn. 2d 511, 516, 199 P.3d 386, 389 (2009)(citing *State v. Gaines*, 154 Wn.2d 711, 716, 116 P.3d 993 (2005) and *State v. Carneh*, 153 Wn.2d 274, 281, 103 P.3d 743 (2004)). If the record provides substantial evidence to support a trial court's findings of fact, that fact will be binding on appeal. *State v. Neeley*, 113 Wn. App. 100, 105, 52 P.3d

539, 542 (2002)(citing *State v. Hill*, 123 Wn.2d 641, 644–45, 870 P.2d 313 (1994)).

ARGUMENT

I. THE RECORD CONTAINED SUBSTANTIAL EVIDENCE TO SUPPORT ITS FINDING THAT THE INFORMANT WAS RELIABLE.

The trial court found that everything Ms. Trujillo, the informant, said would happen did happen. Appellant attributes error to this finding claiming that there were multiple contradictory, inconsistencies in the informant's information, but a close look at the testimony and the police report narrative shows that there were no inconsistencies. Appellant first assigns fault to law enforcement for not explaining how the informant's phone call to purchase methamphetamine was consistent with her claim of already having arranged to purchase methamphetamine. Appellant's Brief at 7. No explanation is necessary. The informant told law enforcement that earlier that day she had made plans with the Appellant to buy methamphetamine from him in Pullman that night and that the Appellant had told her he was going to Spokane that day to purchase more methamphetamine to bring back to Pullman. There is nothing inconsistent with the informant calling the Appellant, at the direction of law enforcement, and again making arrangements to purchase

methamphetamine that night from him in Pullman and confirming that he had in fact purchased methamphetamine that day from Spokane. It is strong evidence that her tip to law enforcement was reliable because she was able to solidify those same arrangements and the male voice had confirmed he went to Spokane that day to purchase methamphetamine just as the informant had said Mr. Gunn told her he planned to do. There is no evidence in the record to support the Appellant's supposition that the phone call made in front of police was the first time the information had made plans to purchase methamphetamine from the Appellant that night. Appellant also fails to show how the informant's fear of the Appellant would be inconsistent with him also being her drug dealer as supposed by the Appellant in his second allegation of inconsistencies. *Id.* at 8. Drug dealers can be scary people. For example, in *State v. Guzman*, the defendant was an employee and girlfriend of a suspected drug dealer, who had kidnapped, raped, drugged, and abused her." 11 Wn.App 1021, 1021 (2019).¹ That addicts make poor choices is not a surprise and is one of the reasons for therapeutic courts. RCW 2.30.010. It should not be surprising then that an addict will continue to buy drugs from her dealer despite past abuses. The third alleged inconsistency was the amount of time between

¹ *State v. Guzman* is an unpublished opinion cited pursuant to GR 14.1 and has no binding authority or precedential value, but may be given persuasive value as deemed appropriate by the Court.

the phone call and Mr. Gunn's arrival. *Id.* Sgt. Jordan testified that it was about a fifteen minute drive from Moscow, ID to Pullman, WA depending on traffic. There was no testimony about how long exactly it would take to get from the Walgreens in Moscow to Mr. Gunn's house in Pullman, but Sgt. Jordan did testify that the 30-45 minutes they waited for Mr. Gunn's arrival was consistent with what he suspected it would take for Mr. Gunn to conclude his business at Walgreens and make his way to his house.

There was no conflicting testimony from Mr. Gunn, who did testify, that it would have taken him a longer or a shorter period of time to make such a journey. The fourth alleged inconsistency is that Mr. Gunn appeared alone even though the informant said that Mr. Gunn was often accompanied by an armed individual. *Id.* But often does not mean always, so merely because he was not accompanied on this particular trip does not mean the informant's information was inconsistent. The alleged discrepancies are not discrepancies at all and what the informant said would happen, did in fact happen. Therefore, the trial Judge's determination that everything the informant said would happen did in fact happen was supported by substantial evidence and the finding should not be disturbed on appeal.

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II. THE STOP WAS SUPPORTED BY REASONABLE
ARTICULABLE SUSPICION.

Whether officers had reasonable suspicion for a *Terry* stop is determined by Washington courts applying a “totality of the circumstances” test. *State v. Lee*, 147 Wn. App. 912, 916, 199 P.3d 445 (2008) (citing *Illinois v. Gates*, 462 U.S. 213, 103 S. Ct. 2317, 76 L. Ed. 2d (1983)). This reasonable suspicion may be based on an informant’s tip. *Id.* at 918. If the informant’s tip contains “sufficient indicia of reliability” then, under the totality of the circumstances test, the tip provides reasonable suspicion. *State v. Marcum*, 149 Wn. App. 894, 904, 205 P.3d 969 (2009). To determine if the tip has the requisite sufficiency, the court examines whether (1) circumstance show the informant’s reliability, or (2) some corroborative observation which suggests either (a) the presence of criminal activity or (b) that the informer’s information was obtained in a reliable fashion. *Id.* at 904–05.

Additionally, inferences about human behavior and commonsense are used to determine if reasonable suspicion supported a detention. *Id.* at 907 (quoting *Illinois v. Wardlow*, 528 U.S. 119, 125, 120 S. Ct. 673, 145 L. Ed. 2d 570 (2000)).

//

a. The informant's statements against her penal interest and her motive for receiving favorable treatment are circumstances evidencing her reliability.

When informants have made statements against their penal interest, the Courts have found that the likelihood of the provided information is accurate is heightened. *State v. Merkt*, 124 Wn. App. 607, 613-14, 102 P.3d 828 (2004); *State v. Chamberlin*, 161 Wn.2d 30, 42, 162 P.3d 389 (2007); *State v. Shaver*, 116 Wn. App. 375, 380-81, 65 P.3d 688(2003). In *State v. Merkt*, two individuals volunteered information about drug activity involving the defendant, Merkt, to a detective, hoping they would be treated favorably in other matters. 124 Wn. App. 607, 610-611, 102 P.3d 828, 831 (2004). The detective told them both that no deals could be made. *Id.* Both informants admitted to having made purchases of methamphetamine from the defendant. *Id.* The detective applied for a search warrant using the informants' information, and some other information he had gathered, and the warrant was granted. *Id.* at 612. In analyzing the reliability of the informants' information, that Court held reliability was established because the informants' statements were against their penal interest. *Id.* at 615. The Court was analyzing the informants' reliability under the higher threshold requirement for probable cause to

issue a search warrant. *Id.* at 613. The decision to grant the search warrant was affirmed. *Id.* at 613.

In the current case, the informant made statements against her penal interest. Earlier that evening, Ms. Trujillo had admitted to Sgt. Jordan she had purchased heroin from Jory Smith and that both the heroin and paraphernalia found in her purse were hers, and that she had earlier that day solicited to possess a controlled substance from Mr. Gunn. She also admitted that she had purchased drugs from Mr. Gunn in the past. Sgt. Jordan did not make her any promises regarding the outcome of her charges. If the informants in *Merkt* were found to be reliable because of their statements against penal interest, under the higher threshold for establishing probable cause for a search warrant, then the informant in this case should likewise be found reliable because of her statements against penal interest under the lower threshold for reasonable suspicion. Accordingly, the Court should hold that the *Terry* stop was based on reasonable, articulable suspicion and affirm the trial court's determination that the stop was lawful.

Courts have also found that criminal informants have a strong motive for truthfulness when the information they provide will hopefully result in their being the recipient of favorable treatment for their own

crimes. *State v. Bean*, 89 Wn.2d 467, 469-71, 572 P.2d 1102 (1978); *State v. Marcum*, 149 Wn. App. 894, 908, 205 P.3d 969, 977 (2009).

In *State v. Bean*, as a result of being arrested for a drug offense, Hawn entered into an agreement to provide information to the police regarding a more important man in the drug trade, Bean, in exchange for a favorable recommendation at sentencing. 89 Wn. 2d 467, 469 (1978). Hawn admitted that at least once he had been present when his routine supplier, Stanley, obtained drugs from a man on Longview Fibre Road driving a brown van. *Id.* Hawn described the general vicinity of Bean's house and told police that Bean had a new black van. *Id.* The officers corroborated both Bean's address and that he had access to two vans, a black one and a brown one. *Id.* Other informants revealed that unemployed Bean managed a steady supply of money, traveled to California and from Mexico, and was part of local drug trafficking. *Id.*

Hawn informed the police of his previously made arrangement to purchase meth from Stanley and alerted them on the day that Stanley would have the drugs, but admitted he did not know where the trade would take place. *Id.* at 470. The officers surveilled Longview Fibre Road and when the black van appeared, it was stopped, searched, and the driver arrested. *Id.* Officers did not have a warrant for either the arrest of Bean or the search of his van. *Id.* The court held:

Because of the strong motive that Hawn had to be accurate in the information he provided the officers, we believe Hawn qualifies as a reliable informant upon whom the police were justified in placing reliance. In addition, since verification of previously furnished details concerning Bean had established their accuracy, the police were justified in stopping the van and arresting Bean when he appeared on schedule.

Id. at 471. The court also found that the arrest and search of the van were supported by because probable cause and were thus lawful. *Id.*

Both the informant in *Bean* and the informant in the Appellant's case told law enforcement about where the drug dealer lived and information about the vehicles they drove. The informant in *Bean* supplied the general vicinity of Bean's house and that Bean drove a black and a brown van. Officers verified that information. In the current case, Ms. Trujillo told Sgt. Jordan the name of the street the defendant lived on and the color and make of car the defendant drove. Sgt, Jordan verified the defendant's address. Unlike the informant in *Bean* who did not identify the defendant's vehicle, Ms. Trujillo remained with Sgt. Jordan and identified the appellant's vehicle when it appeared near the location of the arranged drug transaction. The officers in *Bean* were able to corroborate that Bean was involved in local drug trafficking and the deputy in this case was able to confirm that Mr. Gunn had a felony conviction history for delivering controlled substances. As the court in *Bean* found the informant reliable

because of his strong motive to be truthful and held the stop lawful, so too should this court hold that Ms. Trujillo likewise had a strong motive to be truthful, was truthful, and the corroboration done by Sgt. Jordan justified stopping the defendant's car. If the information given the officers in *Bean* was enough for probable cause to support a warrantless arrest and search, then the facts in this case are sufficient for the lower threshold of reasonable suspicion and the trial court's ruling should be affirmed.

The Appellant's arguments that the informant's "self-interested motive- the addiction-fueled compulsion to remain at liberty to continue using drugs, the desire to minimize negative consequences from criminal behavior..."² render her unreliable, actually make her *more* reliable because her motive to be truthful would be strong. First, her deal with Sgt. Jordan was that if she helped them with an investigation then she would not be booked into jail, but had she provided false information she would have been taken to jail where she would not be at liberty to continue using drugs. Second, the negative consequences would not have been minimized, but would have actually been increased had she lied because not only would Sgt. Jordan not have recommended a reduction in charges to the Prosecutor, but he could have also arrested her on charges for Making a False or Misleading Statement to a Public Servant or for

² Appellant's Brief at 7.

Malicious Prosecution. Such consequences for giving false information were recognized in a United States Supreme Court case.

In that case, *Adams v. Williams*, the Court upheld a stop and frisk where a known informant personally told a police officer that there was an armed individual in a nearby vehicle in possession of narcotics. 407 U.S. 143, 145, 92 S. Ct. 1921, 1922, 32 L. Ed. 2d 612 (1972). The officer knocked on the car's window and when it was rolled down the officer reached inside and retrieved the firearm from where the informant had said it would be, even though the officer could not see it from outside the vehicle. *Id.* The Court found that the informant was personally known to the officer and had previously given him information. *Id.* at 146. It also found that the informant had come forward personally and the information was immediately verifiable and had the information been found to be false the informant would be subject to immediate arrest. *Id.* The Court held that "the information carried enough indicia of reliability to justify the officer's forcible stop of [the defendant]. *Id.* That court rejected an argument that an informant's tip alone could not form the basis for a stop and observed instead that in some situations such as when a credible informant warns of an impending crime the tip would be enough to allow an appropriate police response. *Id.* Granted, in the case at bar, the informant's tip was not immediately verifiable because they had to wait

for Mr. Gunn to arrive, the officers were able in short order to listen to a phone call arranging for a drug buy, verify the appellant's address, and verify that he had a criminal history for delivery of a controlled substance. Three Washington Supreme Court cases have relied on *Adams v. Williams*, when addressing informant's tips. *State v. Kennedy*, 107 Wn.2d 1, 726 P.2d 445, (1986); *State v. Sieler*, 95 Wn.2d 43, 621 P.2d 1272 (1980); and *State v. Lesnick*, 84 Wn.2d 940, 530 P.2d 243(1975).

This Court should affirm the trial court's conclusion that the informant's tip possessed sufficient indicia of reliability to stop the vehicle.

b. The corroborated information and the manner in which the informant obtained her information was reliable; therefore, officers could lawfully stop the vehicle.

Officers need not corroborate any of the information contained in the informant's tip if it contains sufficient indicia of reliability. *State v. Ortiz*, 52 Wn. App. 523, 527, 762 P.2d 12, 14 (1988); *Adams v. Williams*, 407 U.S. 143, 145, 92 S. Ct. 1921, 1922, 32 L. Ed. 2d 612 (1972). Because the informant's tip possessed sufficient indicia of reliability as argued above no corroboration was necessary.

However, law enforcement did corroborate the tip and that corroboration when properly considered under a totality of circumstances

test resulted in information that was not innocuous and that was sufficient to form a reasonable suspicion that a crime was being committed.

In *State v. Marcum*, to avoid criminal prosecution an informant told law enforcement that he had arranged to purchase marijuana from the defendant, gave the officers directions to the defendant's home, and a description of the vehicle the defendant would be driving. 149 Wn. App. at 899. The officer used the county assessor's website to confirm the defendant's address. *Id.* The court found that the fact that the police located the described vehicle at the time and place the informant said it would be, "when viewed in context, were not 'innocuous' . . . they directly corroborated everything the informant had previously told [the detective]" and it "frankly strains credulity to suppose that, under these circumstances, none of the information provided by the informant could lead a trained police observer to form a reasonable suspicion that [the defendant] possessed marijuana when he left his home. *Id.* at 908.

The facts in the case at bar are similar to those in *Marcum*. Here Sgt. Jordan corroborated the defendant's address, the informant pointed out the defendant's car as it drove down the dead end street on which he lived, about the time one would expect it would take to wrap up business at the Moscow, Id Walgreens and drive to Webb Street in Pullman, Wa. That all corroborates the conversation Sgt. Jordan overheard Ms. Trujillo

have. This Court should affirm the trial court's conclusion that there was reasonable, articulable suspicion to lawfully stop Mr. Gunn's car, just as the *Marcum* court found that there was reasonable, articulable suspicion to lawfully stop the defendant's car in that case and that the corroborated facts under these circumstances, like the circumstances in *Marcum*, were not innocuous.

Most importantly, the manner in which the informant obtained her information was reliable. Sgt. Jordan heard the phone call the informant placed and heard the male on the phone 1) agree to sell the informant \$200.00 worth of methamphetamine, 2) admit he had the methamphetamine in the car, 3) confirm he had gotten the drugs from Spokane, just as the informant had told law enforcement earlier, and 4) tell the informant he was at the Moscow Walgreens, but would meet her at his house. Thus, the manner in which she obtained her information was reliable- she got it directly from the man she called when Sgt. Jordan asked her to call Mr. Gunn. Because the manner in which the informant obtained her information was reliable, the tip was sufficient to support a finding that the stop was based on reasonable, articulable suspicion and the trial court should be affirmed, and Appellant's conviction for possession of a controlled substance should be upheld.

CONCLUSION

Based on the foregoing, the Respondent requests this Court affirm the trial court's Findings of Fact and Conclusions of law and affirm the Appellant's conviction for Possession of a Controlled Substance.

Dated this 10^h day of April 2020.



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Certificate of Mailing

I hereby certify that I emailed a true and accurate copy of the foregoing document to Andrea Burkhardt, attorney for Appellant, to Andrea@2arrows.net.



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April 10, 2020 - 3:03 PM

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