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STATE OF WASHINGTON
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NO. 97496-9

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

v.

SIMON ORTIZ MARTINEZ,

Appellant.

SUPPLEMENTAL BRIEF OF RESPONDENT

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A. INTRODUCTION

The fact of complaint¹ doctrine allows the prosecution to present evidence that the victim complained to someone after the sexual assault. It is not hearsay because it is not offered for the truth of the matter but to establish that the complaint was made. The doctrine was established to rebut the inference that if a victim does not timely complain of a sexual assault then the complaint is less credible. Although society has arguably developed a greater understanding of why a victim might delay reporting, the fact of complaint doctrine remains valid and necessary because a fact of complaint often occurs long before a police report and is important evidence for a jury in evaluating a sexual assault victim's credibility.

B. ISSUES PRESENTED

1. Is the fact of complaint doctrine still relevant and necessary in the present day, when complaints are often made long before police are contacted and the jury might wrongly assume the victim did not timely complain if their initial complaints are not admitted?

¹ The terms "hue and cry" and "fact of complaint" are used interchangeably. In this brief, the State will refer to it as the "fact of complaint" doctrine as it more accurately describes the evidence.

2. Did the trial court act within its discretion in admitting fact of complaint testimony from four witnesses who the victim complained to while the sexual abuse was still ongoing and who did not testify to the details of the victim's complaint or the identity of her abuser?

C. STATEMENT OF THE CASE

After raping and molesting his daughter for nearly a decade, Simon Martinez was convicted of one count of rape of a child in the first degree. CP 3-5, 36. The charging period was July 22, 2009 to July 21, 2012.² CP 1. Martinez received a standard range sentence of 123 months in prison. CP 39.

Y.M. was born on July 22, 2000 in Iowa. RP 524. Y.M. lived with three brothers, her mother and her father, Martinez. RP 528, 531. When she was six or seven years old, the family moved to Washington State. RP 527.

Martinez began touching Y.M. sexually while the family lived in Iowa. RP 535. The first time it happened, Y.M. was playing Barbies with her brothers when her father told her to go to his bedroom. RP 535. Martinez pulled down her pants and underwear

² The charging period was from the day Y.M. turned 9 to the day before she turned 12. CP 1; RP 524.

and began to touch her. RP 536. He touched her thighs and then rubbed her vagina. RP 541. Y.M. did not tell her mother. RP 536. The touching happened about every other week while Y.M. lived in Iowa. RP 545. Sometimes her father would place her hands on his penis and move them so that she rubbed him. RP 546. It happened while her mother was at work. RP 546.

The sexual touching continued when the family moved to the Czech-Mate farm in Washington. RP 547. Martinez usually came to Y.M.'s room in the afternoons after Martinez got off work. RP 547-48.

When Y.M. was nine years old, her youngest brother was injured and Y.M.'s mother spent the night at the hospital. RP 549. Martinez brought Y.M. into his room and began touching her arms and thighs. RP 551, 553. Martinez then took off her pants, spit on his hands, and rubbed them on his penis and her vagina. RP 555-56. Martinez attempted to insert his penis into Y.M.'s vagina. RP 556. It hurt badly and Y.M. told him to stop. RP 556. Martinez got the tip of his penis into Y.M. RP 557. Then Martinez stopped and let Y.M. go back to her bedroom. RP 558. Y.M. did not tell her mother. RP 559.

Martinez raped Y.M. again three months later in a barn at the farm. RP 560. Y.M. was still only nine years old. RP 560. Y.M. was petting horses when Martinez told her to follow him into a storage room. RP 562, 567. In the storage room, Martinez again removed Y.M.'s pants and underwear and tried to put his penis inside of her vagina. RP 570. Martinez's penis entered Y.M.'s vagina slightly. RP 571. Martinez ejaculated on the floor. RP 574.

Martinez warned Y.M. that he would get in trouble if she told anybody. RP 572. Martinez raped Y.M. every other week while the family lived at Czech-Mate farm; the molestation happened almost daily. RP 547.

When Y.M. was ten years old, the family moved to Donida Farm. RP 579. Two months after moving to Donida, the assaults resumed. RP 581. Martinez assaulted Y.M. in the living room and in her bedroom at night. RP 583, 587-89.

Martinez rewarded Y.M.'s cooperation with pets. RP 590. He gave her two Siamese kittens, which he made her keep in the garage. RP 590. One time Martinez came into the garage and put his Carhartt jacket on the ground, told Y.M. to sit on it, and then forced his penis into her mouth until she gagged. RP 594-95.

Martinez warned her to cooperate if she wanted a new dog. RP 596. Two months later, Martinez bought her a dog. RP 598-98.

The rapes happened about every other week at Donida. RP 598. Y.M. recalled one time when she was 11 and got so upset when Martinez tried to rape her that she rolled into a ball and begged him to stop until he gave up and left. RP 601.

When Y.M. got her period at age 11 or 12, she told her mother. RP 609. Her mother reported that to Martinez. RP 731. Prior to this, Martinez used no protection when he raped Y.M. RP 609. After Y.M. got her period, Martinez used condoms and flushed them down the toilet. RP 609-10.

Y.M. testified that her father was not circumcised. RP 610. This was confirmed in a stipulation read to the jury. RP 660.

In June 2014, Y.M. told her friend, A.T., that her dad was raping her. RP 503, 610. Y.M. and A.T. were close and would spend time at each other's houses and eat lunch together. RP 503. Most often, Y.M. went to A.T.'s house. RP 503. A.T. observed that Y.M. did not interact with her father much. RP 505. On the day of the disclosure, Y.M. had gone to the pond on her property with A.T. RP 610, 612. A boy that A.T. knew was at the pond. RP 612. A.T. hugged him and talked with him. RP 613. Martinez showed up at

the pond and was very upset that a boy was with the girls. RP 613. He called Y.M.'s mother and she picked the girls up. RP 613-14. It was later, at Y.M.'s house, that Y.M. told A.T. that Martinez was raping her. RP 615. A.T. urged Y.M. to tell her mother or A.T. would tell her own mother. RP 616.

After Y.M. and her mother dropped A.T. at home, Y.M. told her mother that she had been raped.³ RP 617. Her mother was upset and asked Y.M. if she was lying; Y.M. said no. RP 617. Y.M. begged her mother not to confront her father. RP 617.

Y.M.'s mother drove her to Martinez's work site near the house and made Y.M. confront Martinez. RP 618. Martinez called Y.M. a liar. RP 618. After driving back home, Y.M. went to her room and her mother retreated to the woods where she stayed for several hours. RP 618-19.

Y.M. got a gun that Martinez kept in the garage and took it to her room planning to kill herself. RP 619, 653. Martinez took back the gun and then left the house. RP 620. Martinez was out of the house for a few days. RP 620. No one took Y.M. to the hospital

³ Y.M. was permitted to testify that she told her mom she had been raped. RP 617. Y.M.'s mother was permitted to testify that Y.M. told her she had been raped. RP 740. Neither was permitted to identify Martinez in those statements. RP 343.

and nobody called the police. RP 621. Y.M. did not want to go to the police because she did not want her father to get in trouble.⁴ RP 621.

Y.M. ran away from home in November 2014 because she felt like a burden to her family. RP 622. She stayed with her friend, C.R., for a few days around and on Thanksgiving. RP 623. On the day after Thanksgiving, Y.M. told C.R. that she had been raped. RP 436. Y.M. cried as she told C.R. RP 436.

C.R.'s mother became suspicious that Y.M. was staying with them for so long, so Y.M. left to stay at someone else's house. RP 437. But one night Y.M. had nowhere to go so she texted C.R. and C.R. and her mother picked her up. RP 437. Y.M. told C.R.'s mother in the car that she had been raped. RP 455.

Y.M.'s parents sent her to live with her aunt and uncle in Iowa on December 18, 2014. RP 753. The abuse was not reported to police until March 2016. RP 471.

Martinez testified that he never had sexual intercourse with Y.M. RP 772.

⁴ According to the State's offer of proof prior to trial, the sexual abuse continued once Martinez returned home. RP 19-20.

During pretrial hearings, the State moved to admit fact of complaint testimony from Y.M.'s mother, A.T., C.R., and C.R.'s mother. RP 20. The State told the court that the abuse of Y.M. continued until she left the home in December of 2014. RP 19-20. The court admitted the narrow testimony that Y.M. made a complaint to each of them. RP 340-43.

At trial, A.T. testified, "she told me she had been molested and raped." RP 508. Y.M.'s mother testified that Y.M. told her, "I've been raped." RP 740. C.R. testified, "[Y.M.] told me she had been raped." RP 436. C.R.'s mother testified, "[Y.M.] said she had been abused and didn't want to go home." RP 455.

D. ARGUMENT

1. THE "FACT OF COMPLAINT" DOCTRINE REMAINS VALID AND NECESSARY.

The "fact of complaint" doctrine remains a valid and necessary doctrine in the prosecution of sexual assaults. The admission of such testimony allows the prosecution to show that the victim complained to someone within a timely manner after the assault to rebut the inference that the charge was fabricated. In many cases, evidence of a timely complaint is not admissible under any other rule.

The fact of complaint doctrine allows only such evidence as will establish that the complaint is “timely made.” State v. Chenoweth, 188 Wn. App. 521, 532, 354 P.3d 13 (2015). The fact of complaint doctrine excludes “evidence of the details of the complaint, including the identity of the offender and the nature of the act.” State v. Ferguson, 100 Wn.2d 131, 136, 667 P.2d 68 (1983).

The fact of complaint doctrine is not an exception to the hearsay rules because it is not offered for the truth of the matter asserted.⁵ ER 801(c). Rather, the testimony is admitted for the sole purpose of establishing a complaint was made to bolster the victim’s credibility, not as substantive evidence of the crime. State v. Bray, 23 Wn. App. 117, 121, 594 P.2d 1363 (1979); see also State v. Pugh, 167 Wn.2d 825, 842, 225 P.3d 892 (2009) (“The fact that a complaint was made was considered to be original evidence, not hearsay.”).

⁵ Although not hearsay, Division 3 held that fact of complaint statements must contain “particular guarantees of trustworthiness.” State v. Ackerman, 90 Wn. App. 477, 484, 953 P.2d 816 (1998). Those guarantees must be drawn from the totality of circumstances surrounding the making of the statements and must “render the declarant particularly worthy of belief” such as whether the statements were spontaneous, the victim’s demeanor at the time, whether the victim was prompted to make the statements and whether the victim had a reason to lie. Id.

The supreme court explained the history and purpose of the common law “hue and cry” doctrine in State v. Murley, 35 Wn.2d 233, 212 P.2d 801 (1949):

This doctrine rests on the ground that a female naturally complains promptly of offensive sex liberties upon her person and that, on trial, an offended female complainant’s *omission of any showing* as to when she first complained raises the inference that, since there is no showing that she complained timely, it is more likely that she did not complain at all therefore that it is more likely that the liberties upon her person, if any, were not offensive and that consequently her present charge is fabricated.

Id. at 237 (emphasis in original).

The State may present testimony from multiple fact of complaint witnesses. In State v. DeBolt, 61 Wn. App. 58, 63, 808 P.2d 794 (1991), an indecent liberties case, the court affirmed that the victim’s sister and social worker were both properly permitted to testify to the victim’s complaint under the fact of complaint doctrine. Similarly, in State v. Ackerman, 90 Wn. App. 477, 481-82, 953 P.2d 816 (1998), a child molestation case, the court upheld the admissibility of fact of complaint testimony from three separate witnesses (the victim’s two schoolmates and a school counselor).

Appellate courts review a trial court’s decision to admit fact of complaint evidence for abuse of discretion. State v. Foxhoven,

161 Wn.2d 168, 174, 163 P.3d 786 (2007). Thus, for a defendant to prevail, he must satisfy this Court that “no reasonable judge would have reached the same conclusion” as the court did here. State v. Powell, 126 Wn.2d 244, 258, 893 P.2d 615 (1995).

Although our society has arguably developed a greater understanding as to why victims of ongoing sexual abuse – particularly children - might not report the abuse when it first happens, this does not render the fact of complaint doctrine unnecessary or antiquated. See State v. Petrich, 101 Wn.2d 567, 569, 683 P.2d 173 (1994) (expert testimony established that in over 50% of child sex abuse cases, children will delay reporting and the length of the delay correlates with the relationship between the child and the abuser);⁶ see also State v. Holland, 77 Wn. App. 420, 423, 427-28, 891 P.2d 49 (1995) (it is not uncommon for child victims of sexual abuse to delay reporting); State v. Claffin, 38 Wn. App. 847, 852, 690 P.2d 1186 (1984) (late reporting was not unusual among sexually abused children).

The question of *when* a sexual abuse victim first reported their abuse is always important when the State has asked a jury to

⁶ Overruled on other grounds by State v. Kitchen, 110 Wn.2d 403, 759 P.2d 105 (1988), overruled on other grounds by In re Stockwell, 179 Wn.2d 588, 316 P.3d 1007 (2014).

base a verdict on the credibility of a victim's testimony. In the absence of evidence to the contrary, the jury might believe the victim's first report was to the police, feeding the frequently deployed defense narrative that the victim falsely reported abuse to harm their alleged abuser or otherwise get their way. In the present case, Y.M. first reported her abuse to her mother and her friend, A.T., almost two years before it was reported to police. RP 471, 508, 740. The second report to her friend, C.R., and to C.R.'s mother, was 16 months before police were contacted. RP 436, 455, 471. Without evidence of when Y.M. first reported the abuse, the jury might assume that even though the abuse ended in 2014, Y.M. had not reported it until March of 2016. This mistaken impression would greatly hamper the State's ability to establish Y.M.'s credibility.

In some cases, the State may introduce evidence of a victim's prior reports of abuse under ER 801(d)(1)(ii), which allows the admission of prior consistent statements.⁷ State v. Osborn, 59 Wn. App. 1, 3, 795 P.2d 1174 (1990). However, a prior consistent statement is only admissible "to rebut a charge of recent fabrication

⁷ Under ER 801(d)(1)(ii), the full substance of the victim's reports are admissible, not just the limited evidence permitted under the fact of complaint doctrine.

or improper motive.” Id. at 4. Therefore, unless a victim is cross-examined in a way that implies that she lied or had a motive to lie about the abuse, the prior reports of abuse will not come in.

A defendant can cross-examine a victim of sexual abuse on a number of topics that undermine the charge without implying the victim lied. For example, as in this case, a defendant might elicit facts establishing the location where the victim alleged the abuse to have occurred was very public (a barn), or that there were other people who could have walked in (owners and trainers). RP 634-36.

Sadly, despite a greater understanding in the community of sexual abuse and the delays in reporting, the underlying rationale for the fact of complaint doctrine, as explained in Murley, still exists. Most people assume that when someone is abused they will tell somebody about it, even if not law enforcement, relatively close in time to the abuse still occurring. The fact of complaint doctrine allows the State to present evidence that the victim did in fact complain in a timely manner to somebody even if such a complaint was not investigated or prosecuted for many years. This evidence is critical to establishing a victim’s credibility, particularly when that victim is a child. The fact of complaint doctrine should be affirmed.

2. THE VICTIM'S COMPLAINTS WERE TIMELY UNDER THE FACT OF COMPLAINT DOCTRINE.

The fact of complaint doctrine requires that the “complaint be timely made.” Chenoweth, 188 Wn. App. at 532. The courts have not established a bright line rule for what “timely” means. Osborn, 59 Wn. App. at 7 n.2. In Chenoweth, the court held that a report of a one-time rape made a year after it occurred was not timely. Chenoweth, 188 Wn. App. at 532. In State v. Griffin, 43 Wn. 591, 598-99, 86 P. 951 (1906), the 15-year-old victim did not report the sexual assault until six months after the last time she was raped and the court held that report was not timely. In State v. Myrberg, 56 Wn. 384, 385, 105 P. 622 (1909), the defendant raped a girl in late February or the first of March and the young girl’s disclosure as late as mid-March was held to be “seasonably made.” In Ackerman, 90 Wn. App. at 481, the court admitted fact of complaint testimony from two friends that the victim reported her stepfather had sexually abused her over the past year.⁸

⁸ The charging period for the abuse was October 1, 1994 to October 9, 1995. Ackerman, 90 Wn. App. at 480. The victim reported to one friend in October of 1995 and to another friend in November or December 1995. Id. at 481. It is not clear from the opinion whether the specific dates of the abuse was established at trial.

Whether a complaint is timely made should be dependent on the facts and circumstances. It is not reasonable to expect a child victim who lives with and loves her abuser and has been groomed to keep the secret to react in the same way as an adult who has been raped by a stranger. A complaint is timely when made when there is the “opportunity to complain.” Griffin, 43 Wn. at 597. When this opportunity reasonably arises will vary with the facts of the case. The evidence of complaint will be excluded only when it “ceases to have corroborative force.” Id. at 598.

A child victim who is regularly sexually assaulted and still lives with her accuser is not likely to make her first report after the first time she is assaulted. Petrich, 101 Wn.2d at 569. Here, Y.M. had been subjected to ongoing and frequent sexual abuse and rape since she was 5 years old. RP 535. She lived in the same home as her abuser until December 2014. RP 753. Her first report of abuse was on June 14, 2014, to her friend, A.T. and to Y.M.’s mother, when Y.M. was 14. RP 340, 508, 740. She again reported abuse to her friend, C.R., and C.R.’s mom, five months later in November 2014, when she had run away and did not want to return home. RP 436, 455. When the trial court made its pretrial ruling admitting the fact of complaint testimony from the four witnesses,

the State had submitted an offer of proof that Y.M. had told police that the sexual abuse continued until she moved to her aunt's home in December 2014. RP 19-20. At trial, the State did not ask Y.M. if the abuse continued after she reported it to her mother in June 2014, but the trial court's ruling was properly based on the State's pretrial offer of proof. RP 19-20; State v. Stearman, 187 Wn. App. 257, 265, 348 P.3d 394 (2015).⁹

The trial court did not abuse its discretion in admitting the evidence of Y.M.'s reports of abuse to her mother, A.T., C.R. and C.R.'s mother when the abuse was still ongoing as it was clearly timely.¹⁰

Martinez has cited no authority to support his argument that a trial court's ruling on the timeliness of fact of complaint evidence should be based on the charging period. The prosecutor's subsequent decision as to the charging period and how many crimes to charge has no logical relevance to the timeliness of the fact of complaint. In the present case, evidence of Martinez's

⁹ A trial court may alter a pretrial ruling based on an offer of proof if actual testimony differs. State v. White, 43 Wn. App. 580, 584, 718 P.2d 841 (1986). The trial court was not asked to do so here and properly relied on the pretrial offer of proof.

¹⁰ Even if the abuse had stopped after Y.M. told her mother, a delay of five months should still be considered "timely" when the victim is still living in the same home with her abuser.

abuse of Y.M. starting when she was age five until age fourteen was admitted at trial under ER 404(b) to establish “lustful disposition.”¹¹ RP 345-47. Yet the charging period was from age nine through eleven. CP 1; RP 524.

3. ANY ERROR WAS HARMLESS.

Even if Y.M.’s complaints were not timely made and the evidence was improperly admitted, any error was harmless. Erroneous evidentiary rulings are reviewed under the non-constitutional harmless error standard. State v. Ray, 116 Wn.2d 531, 546, 806 P.2d 1220 (1991). Under this standard, an erroneous ruling is reversible only if there is a reasonable probability that the error materially affected the outcome of the trial. State v. Calegar, 133 Wn.2d 718, 727, 947 P.2d 235 (1997).

In the present case, Y.M. gave detailed testimony about numerous instances of abuse during the charging period. RP 549-62, 566-74, 579-81, 583-87, 589-96. Y.M. described where the abuse occurred, when it usually happened, and what each event entailed. RP 549-62, 566-74, 579-81, 583-87, 589-96. She was able to recall the smells and stains on her mother’s coat when her

¹¹ Martinez has not raised this issue on appeal.

mother came home after one assault. RP 544. Her testimony was consistent with other evidence about where the family lived during each phase of the abuse. RP 526-29, 686, 688-90, 692-93.

Some parts of her testimony were corroborated by her mother's testimony. For example, Y.M. testified that her father gave her kittens and dogs to encourage and reward her cooperation. RP 590, 593, 596. Y.M.'s mother confirmed that Martinez frequently bought Y.M. pets. RP 729-30.

Y.M. also testified that her mother almost caught Martinez abusing her once when she walked into the bedroom and they were both under the covers. RP 599. Y.M.'s mother corroborated that testimony by admitting that it was possible she had walked in on Y.M. and Martinez under the bed sheets together. RP 722-23.

Y.M.'s testimony was also significantly corroborated by Martinez's stipulation that his daughter accurately described his penis. RP 610, 660.

Given this compelling testimony, there is no probability that the outcome of trial could have been different absent the fact of complaint evidence. Accordingly, any error in admitting the testimony was harmless.

E. **CONCLUSION**

The State respectfully asks this Court to affirm.

DATED this 10th day of January, 2020.

Respectfully submitted,

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