NO. 47183-3-II

COURT OF APPEALS, DIVISION II
STATE OF WASHINGTON

STATE OF WASHINGTON, RESPONDENT

v.

LEO LAVERN RUBEDEW, APPELLANT

Appeal from the Superior Court of Pierce County
The Honorable Garold Johnson

No. 13-1-01876-6

Brief of Respondent

MARK LINDQUIST
Prosecuting Attorney

By
Thomas C. Roberts
Deputy Prosecuting Attorney
WSB # 17442

930 Tacoma Avenue South
Room 946
Tacoma, WA 98402
PH: (253) 798-7400

Table of Contents

Table of Authorities

State Cases

Federal and Other Jurisdictions

Constitutional Provisions

Statutes

A. ISSUES PERTAINING TO APPELLANT'S ASSIGNMENTS OF ERROR.

1. Where two crimes, based upon the same act, are charged in separate counts, does a hung jury mistrial on one of the counts result in continuing jeopardy on that count?

2. Where two crimes, based upon the same act, are charged in separate counts, does an acquittal on one count terminate jeopardy for both counts?

3. Does the defendant show that the jury necessarily decided a factual issue in a previous trial that precludes the issue in the subsequent trial?

4. Did the trial court consider the defendant's ability to pay before imposing legal financial obligations?

B. STATEMENT OF THE CASE.

1. Procedure

On May 8, 2013, the Pierce County Prosecuting Attorney (State) charged Leo Rubedew, the defendant, with assault in the second degree and felony harassment. CP 1-2. As the case progressed, the State amended the charges to one count each of attempted murder in the first degree (premeditated), and assault in the first degree (intent to inflict grievous bodily harm). CP 5-6.

This case went to trial three times. The first trial ended in a mistrial because the defendant's health prevented him from fully participating. Trial 1: 3 RP 361, 370[1]. The case was rescheduled.

The matter went to trial again, beginning on August 11, 2014. After hearing all the evidence, the jury found the defendant not guilty on Count I, attempted murder. CP 43. However, the jury was deadlocked and could not reach a verdict on Count II, assault in the first degree. Trial 2: 3 RP 304, CP 44, 45. On the defendant's motion, the court declared a mistrial as to Count II, and the matter was set for a new trial on Count II. Trial 2: 3 RP 305, 306.

Before the third trial, the defendant moved to dismiss Count II, arguing that the prosecution was barred by double jeopardy. 1 RP 15, CP 52-66. The court denied the motion. 1 RP 42.

The matter proceeded to trial. After hearing all the evidence, the jury convicted the defendant of assault in the first degree, as charged. CP 108. The jury also found that the crime was one of domestic violence (CP109) and that the defendant was armed with a firearm (CP 110).

The court sentenced the defendant within the standard range. CP 133. The defendant filed a timely notice of appeal. CP 141.

---

[1] There are VRP's from each of the trials. Because this appeal concerns only the last one, the citations to the record will refer to the third trial, unless specifically referring, as here, to one of the other two trials.

2. Facts

Charlaine Bramlett and the defendant were divorced in 2009. 3 RP 151. She left him because of his abuse of alcohol. 3 RP 155. Later, after the defendant was released from a hospital stay, she permitted him to live in her house and he paid her rent. 3 RP 157. The defendant suffered from kidney disease. 3 RP 158. As a retired nurse, she assisted him with home-based dialysis. *Id.*

On the evening of May 7, 2013, Ms. Bramlett was sitting in her living room, having returned home after shopping with friends. 3 RP 164. The defendant returned to the house in the evening intoxicated. *Id.* He went to his room. 3 RP 165. Ms. Bramlett, who had loaned the defendant her vehicle, went into his room to retrieve the keys. *Id.* The defendant became very angry, yelling at Ms. Bramlett. *Id.* She told the defendant that he needed to move out. *Id.*

Ms. Bramlett returned to the living room to continue watching television. 3 RP 166. The defendant, very angry, came out to the living room. *Id.* The defendant asked Ms. Bramlett to step outside with him. 3 RP 167. She could see that he had one arm behind his back. *Id.* As the defendant turned, she saw that he was holding a gun in his right hand. 3 RP 168.

Ms. Bramlett immediately reached for the telephone and called 911. 3 RP 169. The defendant went out the back door and sat in a patio chair. 3 RP 173. Ms. Bramlett watched from a few feet away as the

defendant "monkeyed" with the gun. 3 RP 174. The defendant then pointed the gun at her and ordered her to get off the telephone or he would shoot her. *Id.* The defendant pointed the gun at her head, two feet away. *Id.* Ms. Bramlett heard the gun "click". *Id.* She watched the defendant "wrestle" with the gun, as he tried to get it to work. 3 RP 176. She then watched him put the gun in his mouth. 3 RP 176.

Throughout the defendant's actions, Ms Bramlett was on the telephone with the 911 operator. *Id.* Ms. Bramlett left the house as the defendant got up from the chair, carrying the gun. 3 RP 177.

Soon, Sheriff's deputies arrived. They found Ms. Bramlett across the street, trembling and crying. 1 RP 84. They found the defendant lying on his back in the front yard. 1 RP 85. The deputies arrested the defendant. 1 RP 86. The defendant told them that the gun was on the kitchen table. 1 RP 87. Deputies entered the house and recovered the gun. 1 RP 90.

Deputies examined the gun. They found that the ammunition had been loaded backwards in the magazine. 1 RP 90, 3 RP 287. They found a round jammed backwards in the firing chamber. *Id.*

C. ARGUMENT.

1. DOUBLE JEOPARDY DOES NOT BAR THE STATE FROM TRYING THE DEFENDANT A SECOND TIME FOR ONE COUNT OF ASSAULT WHERE A JURY DEADLOCK RESULTED IN MISTRIAL.

The Double Jeopardy Clause of the Fifth Amendment of the United States Constitution provides that no person shall "be subject for the same offence to be twice put in jeopardy of life or limb." It protects against being (1) prosecuted a second time for the same offense after acquittal, (2) prosecuted a second time for the same offense after conviction, and (3) punished multiple times for the same offense. *See*, ***North Carolina v. Pearce***, 395 U.S. 711, 717, 89 S. Ct. 2072, 2076, 23 L. Ed. 2d 656 (1969). Art. 1, § 9 of the Washington State Constitution has a similar Double Jeopardy Clause. It provides that no person shall "be twice put in jeopardy for the same offense."

The Double Jeopardy Clause of the Fifth Amendment to the United States Constitution and the Double Jeopardy Clause of Article I, section 9 of the Washington Constitution provide the same protection. ***State v. Gocken***, 127 Wn.2d 95, 107, 896 P.2d 1267 (1995). Claims of double jeopardy are questions of law that are reviewed de novo. *See* ***State v. Kelley***, 168 Wn.2d 72, 76, 226 P.3d 773 (2010). Double jeopardy bars retrial on the same crime if three requirements are met: (1) jeopardy previously attached, (2) jeopardy terminated, and (3) the defendant is in

jeopardy a second time for the same offense in fact and law. ***State v. Corrado***, 81 Wn. App. 640, 645, 915 P.2d 1121 (1996).

To determine whether the two charges or crimes are the "same offense" for double jeopardy purposes, the courts use the test discussed in ***Blockburger v. United States***, 284 U.S. 299, 52 S. Ct. 180, 76 L. Ed. 306 (1932). Early in our State history, our Supreme Court presciently decided a similar case. In ***State v. Reiff***, 14 Wn. 664, 45 P. 318 (1896), the defendant was charged with obtaining property under false pretenses. He argued that it was barred by double jeopardy in that he had previously been charged with larceny of the same item in the same incident and the court dismissed for insufficiency evidence. *Id.*, at 665. The Supreme Court rejected his argument, holding that the two crimes were not the "same offense" for double jeopardy purposes. The Court used a "same elements" and "same evidence" analysis:

> There are elements requisite to each which are not necessary to the other, and proof of the offense charged in either of the informations would not be sufficient to sustain a conviction under the other. To sustain the plea [of double jeopardy], the offenses must be identical both in fact and in law. "A conviction or acquittal upon one indictment is no bar to a subsequent conviction and sentence upon another, unless the evidence required to support a conviction upon one of them would have been sufficient to warrant a conviction upon the other." "The test is not whether the defendant has already been tried for the same act, but whether he has been put in jeopardy for the same offense."

Reiff, at 667-668 (internal citations omitted).

In ***Blockburger***, The defendant was charged with five counts of unlawful sale of morphine. The jury returned a verdict against the defendant for the second, third, and fifth counts only. Each count charged a sale of morphine to the same purchaser. Even though some of the charges arose from the same act, the Court rejected the defendant's argument that they were the "same offense" for double jeopardy purposes.

The Court explained what is now the "same elements" and "same evidence" rules:

> Each of the offenses created requires proof of a different element. The applicable rule is that, where the same act or transaction constitutes a violation of two distinct statutory provisions, the test to be applied to determine whether there are two offenses or only one, is whether each provision requires proof of a fact which the other does not.

Blockburger, 284 U.S. at 304. And:

> A single act may be an offense against two statutes; and if each statute requires proof of an additional fact which the other does not, an acquittal or conviction under either statute does not exempt the defendant from prosecution and punishment under the other.

Id.

Although, as pointed out below, the ***Blockburger*** analysis is most frequently applied in merger analyses, its determination of "same offense" for double jeopardy purposes also applies to subsequent prosecutions. *See,* ***Gocken,*** 127 Wn. 2d at 102, *citing* ***United States v. Dixon***, 509 U.S. 688, 113 S. Ct. 2849, 125 L. Ed. 2d 556 (1993); *see also* ***Reiff***, *supra.*

The Washington Supreme Court has analyzed attempted first degree murder and assault in the first degree for the purposes of the same punishment, or merger, prong of double jeopardy. ***In re Personal Restraint of Orange***, 152 Wn. 2d 795, 100 P. 3d 291 (2004). As charged in the present case, the charges would have merged under ***Orange***. But, until there is a conviction on the two charges occurs, or jeopardy terminates on both crimes charged in one proceeding, a ***Blockburger*** analysis does not apply. *See* ***State v. Ahluwalia***, 143 Wn. 2d 527, 539, 22 P. 3d 1254 (2001).

Attempted premeditated murder and assault in the first degree with a firearm are not necessarily the "same offense". Attempted murder requires a (1) substantial step with (2) intent to commit the requisite level of murder. *See* RCW 9A.28.020. Murder in the first degree requires: (1) premeditated (2) intent to (3) cause death. *See* RCW 9A.32.050(1)(a). Assault in the first degree does not require premeditation or the intent to kill. Assault in the first degree requires: (1) intent to (2) inflict grievous bodily harm (3) assault (4) with a firearm or deadly weapon. *See* RCW 9A.36.011(1)(a). Therefore, the crimes charged have different elements.

For similar reasons, assault in the first degree is not a lesser included offense of attempted murder. *See* ***State v. Harris***, 121 Wn. 2d 317, 321, 849 P. 2d 1216 (1993). This is because each of the elements of the lesser offense (assault) is not a necessary element of the offense charged (attempted murder). *Id.*, at 320-321; *see* ***State v. Workman***, 90

Wn.2d 443, 447-448, 584 P.2d 382 (1978). This is likely why the prosecutor in the present case charged assault in the first degree as a separate count.

a. Jeopardy has not terminated in Count II.

The Double Jeopardy Clause only applies if "there has been some event, such as an acquittal, which terminates the original jeopardy." ***Richardson v. Unites States***, 468 U.S. 317, 325, 104 S. Ct. 3081, 82 L. Ed. 2d 242 (1984). In this case, there was no acquittal terminating jeopardy in Count II.

There is no dispute that jeopardy does not terminate when the trial judge discharges the jury because there was a manifest necessity; specifically, as here, a hung jury. *See* ***Illinois v. Somerville***, 410 U.S. 458, 461, 93 S. Ct. 1066, 35 L. Ed. 2d 425 (1973); ***State v. Strine***, 176 Wn.2d 742, 757, 293 P.3d 1177 (2013); ***State v. McPhee***, 156 Wn. App. 44, 56, 230 P.3d 284 (2010). Therefore, the State may retry a defendant for the same crime where a trial ends in a hung jury. *Id.*

In ***State v. Ahluwalia***, 143 Wn. 2d 527, 22 P. 3d 1254 (2001), the Supreme Court examined a similar double jeopardy argument as applied to retrial on a lesser-included offense. There, the defendant was charged and tried for conviction for first degree murder. He was acquitted of the original charge, but the jury deadlocked on the lesser-included crime of second degree murder. He was convicted of second degree murder in the retrial after the mistrial. *Id.*, at 529. Ahluwalia argued on appeal that

double jeopardy and RCW 10.43.050 barred his retrial for second degree murder.

The Supreme Court held that Ahluwalia was properly retried for second degree murder without violating double jeopardy or RCW 10.43.050 because he was neither convicted nor acquitted of the charge of murder in the second degree in the first trial. *Id.*, at 538. The Court further rejected his "same offense" argument, finding that the ***Blockburger*** rule did not apply because jeopardy had not terminated after a mistrial was declared in the earlier trial on the second degree murder. *Id.*, at 539.

Similarly, in the present case, although it did not involve a lesser-degree or included offense, there was an acquittal on Count I, and a mistrial for a hung jury regarding a fact-related Count II. Ahluwalia had a much stronger argument regarding "same offense" than the current defendant. Premeditated murder in the first degree and intentional murder in the second degree are far closer in elements and evidence than attempted premeditated murder and assault in the first degree (see detailed analysis above).

Therefore, jeopardy regarding Count II did not terminate at the end of the second trial. Jeopardy continued to the last trial on Count II. As in ***Ahluwalia***, a ***Blockburger*** or ***Reiff*** analysis does not apply here.

b. The defendant was not acquitted of assault in the first degree.

The defendant argues that he was prosecuted a second time after acquittal. An acquittal is "a resolution, correct or not, of some or all of the factual elements of the offense charged." ***Sanabria v. United States***, 437 U.S. 54, 71, 98 S. Ct. 2170, 57 L. Ed. 2d 43 (1978), quoting ***United States v. Martin Linen Supply Co.***, 430 U.S. 564, 571, 97 S. Ct. 1349, 51 L. Ed. 2d 642 (1977).

Here, the defendant was acquitted of Count I, attempted murder, but not Count II, assault in the first degree. CP 43, 44. The defendant does not argue an implied acquittal, which has been rejected by the Supreme Court in ***State v. Ervin***, 158 Wn.2d 746, 752–53, 147 P.3d 567 (2006); ***State v. Daniels***, 160 Wn.2d 256, 265, 156 P.3d 905 (2007) (Daniels I), *adhered to on recons.*, 165 Wn.2d 627, 628, 200 P.3d 711 (2009) (Daniels II); and, most recently, in ***State v. Glasmann***, 183 Wn. 2d 117, 349 P. 3d 829 (2015). As in ***Ahluwalia***, the acquittal in Count I did not "include" Count II.

Here, at the end of the second trial, the jury was unable to agree on a verdict on Count II. Because the jury was unable to agree on Count II, jeopardy continued, which permitted the State to re-try the defendant on that count.

c. Charging and double jeopardy.

In a double jeopardy analysis, the Supreme Court has noted that it is important to distinguish between charges and convictions. *See* ***State v. Calle***, 125 Wn.2d 769, 777 n. 3, 888 P.2d 155 (1995). The State may charge, and try, multiple counts that may combine, merge, or be dismissed at sentencing. *See* ***State v. Kier***, 164 Wn.2d 798, 803, 194 P.3d 212 (2008); *see also* ***Ball v. U.S.***, 470 U.S. 856, 859, 861, 105 S. Ct. 1668, 84 L. Ed. 2d 740 (1985). In ***State v. Womac***, 160 Wn.2d 643, 658, 160 P.3d 40 (2007), the Supreme Court recognized that the State may pursue multiple charges arising from the same criminal conduct, but the State may only obtain one conviction for the same offense. The Supreme Court has pointed out that the merger doctrine only applies after multiple convictions because the court cannot predict on which charges the defendant will be convicted. *See* ***State v. Michielli***, 132 Wn. 2d 229, 238-239, 937 P. 2d 587 (1997). Here, as recognized in ***Michielli***, there was a deadlocked jury and the defendant was eventually convicted of only one count.

d. Merger as part of double jeopardy.

The defendant uses a merger analysis to argue that attempted premeditated murder and assault in the first degree are the same in fact and law. But merger does not arise until there is more than one conviction. The cases cited by the defendant: ***In re Personal Restraint of Orange***, 152 Wn. 2d 795, 100 P. 3d 291 (2004); ***State v. Gohl***, 109 Wn. App. 817, 37 P.

3d 293 (2001); and ***State v. Valentine***, 108 Wn. App. 24, 29 P.3d 42 (2001), are all merger cases where the defendant had been *convicted* of *both* attempted murder and assault.

The merger doctrine is a doctrine of statutory interpretation that is employed when, to prove an element or degree of a crime, the State must prove conduct that constitutes at least one additional crime. ***State v. Kier***, 164 Wn.2d 798, 804, 194 P.3d 212 (2008); ***State v. Vladovic***, 99 Wn.2d 413, 418–420, 662 P.2d 853 (1983). Under the "same evidence" test, if the crimes as charged and proved are the same in law and in fact, they may not be punished separately absent clear and contrary legislative intent. ***Blockburger***, 284 U.S. at 304. Under this test, "[i]f each crime contains an element that the other does not, we presume that the crimes are not the same offense for double jeopardy purposes." *Id.*; ***Calle***, 125 Wn.2d at 777.

Because merger involves the double jeopardy bar against double punishment, there is no merger issue unless there are two convictions. *See* ***State v. Michielli***, 132 Wn. 2d 229, 238, 937 P. 2d 587 (1997). If as in ***Orange***, ***Gohl***, and ***Valentine***, the current defendant had been convicted of both attempted murder and assault in the first degree for the same act, the counts would have merged at sentencing. But, the defendant was convicted of only one of two counts. Therefore, where the defendant is acquitted of one count and convicted of another, the merger analysis does not apply. *See* ***Michielli***, *supra.*

2. THE ASSAULT CONVICTION DOES NOT VIOLATE THE COLLATERAL ESTOPPEL ASPECT OF DOUBLE JEOPARDY.

In ***Ashe v. Swenson***, 397 U.S. 436, 443, 90 S. Ct. 1189, 25 L. Ed. 2d 469 (1970), the United States Supreme Court held that the Fifth Amendment to the United States Constitution guaranty against double jeopardy includes the doctrine of collateral estoppel. Collateral estoppel applies in a criminal case because of the double jeopardy concept of preserving the finality of the jury's judgment. *See* ***Yeager v. United States***, 557 U.S. 110, 129 S. Ct. 2360, 174 L. Ed.2d 78 (2009). ***Ashe*** held that the Double Jeopardy Clause precludes the government from relitigating any issue that was necessarily decided by a jury's acquittal in a prior trial. ***Ashe***, 397 U.S. at 443. Collateral estoppel (or issue preclusion) "means simply that when an issue of ultimate fact has once been determined by a valid and final judgment, that issue cannot again be litigated between the same parties in any future lawsuit." *Id.*

The defendant bears the burden to demonstrate that the issue he seeks to foreclose was actually decided in the prior proceeding. ***Dowling v. United States***, 493 U.S. 342, 350, 110 S. Ct. 668, 107 L. Ed. 2d 708 (1990). The same issue must be an ultimate fact or issue in the subsequent proceeding. *Id.* Where a previous judgment of acquittal was based on a general verdict, courts must "examine the record of [the] prior proceeding, taking into account the pleadings, evidence, charge, and other relevant

matter, and conclude whether a rational jury could have grounded its verdict on an issue other than that which the defendant seeks to foreclose from consideration." ***Ashe***, 397 U.S., at 444 (internal cite omitted).

In Washington, collateral estoppel applies in a criminal context only where four questions are answered affirmatively:

> (1) Was the issue decided in the prior adjudication identical with the one presented in the action in question? (2) Was there a final judgment on the merits? (3) Was the party against whom the plea of collateral estoppel is asserted a party or in privity with the party to the prior adjudication? (4) Will the application of the doctrine work an injustice on the party against whom the doctrine is to be applied?

State v. Tili, 148 Wn.2d 350, 361, 60 P.3d 1192 (2003).

Here, the defendant must show that the factual issues decided in the prior trial are identical to those decided by the subsequent jury. Where "a rational jury could have grounded its [general] verdict upon an issue other than that which the defendant seeks to foreclose from consideration collateral estoppel will not preclude its relitigation". ***Ashe***, 397 U.S. at 444. Here, the defendant argues that the issue in both trials was "whether Rubedew, with the intent to shoot Bramlett, pointed a firearm at her and pulled the trigger". App. Br. at 22. But this characterization is too simple.

In this case, there was evidence that the defendant was intoxicated and angry. 3 RP 135, 164, 166. He had been suicidal. 3 RP 156. He denied

trying to harm Bramlett and only wanted to hurt himself. 1 RP 88, 3 RP 134. He put the gun in his mouth. 3 RP 176. The ammunition in the gun was loaded backwards. 1 RP 90, 3 RP 287. He went outside with the gun and sat down, leaving Bramlett inside. 3 RP 173.

Considering the evidence in this case, a rational jury could have had reasonable doubt and grounded its "not guilty" verdict on several possible reasons: (1) the defendant lacked premeditation to kill Bramlett (*Cf.* ***State v. Eggleston***, 164 Wn. 2d 61, 74, 187 P. 3d 233 (2008)), (2) the defendant did not intend to kill, (3) the defendant did not take a substantial step with intent to kill, or (4) the defendant did not pull the trigger.

Because the jury could have grounded its verdict on a number of issues, the defendant cannot demonstrate that the general verdict decided and foreclosed a specific factual issue. Therefore, he fails to demonstrate a collateral estoppel bar under double jeopardy.

3. BEFORE IMPOSING LEGAL FINANCIAL OBLIGATIONS, THE TRIAL COURT CONSIDERED THE DEFENDANT'S ABILITY TO PAY.

In ***State v. Blazina***, 182 Wn. 2d 827, 344 P. 3d 680 (2015), the Supreme Court held that, under RCW 10.01.160(3), the sentencing judge must consider the defendant's individual financial circumstances and make an individualized inquiry into the defendant's current and future ability to pay. In this case, there is such a record.

The record shows that the court made an individualized inquiry into the defendant's ability to pay his legal financial obligations (LFOs), and that the court did consider the results of that inquiry. Prior to sentencing, defense counsel asked the court waive all discretionary LFOs. RP 403. Counsel claimed the defendant's age and health problem will preclude him from gainful employment and otherwise accruing sufficient disposal income to pay his LFOs. RP 402-3. Beyond counsel's statements, the court knew of the defendant's fragile health because the first trial was delayed, and ultimately a mistrial declared, due to the defendant's poor health. RP 402.

After hearing argument, the court imposed only minimal LFOs. Besides the mandatory fees and assessments, the court only ordered $500 in recoupment for costs of court-appointed counsel. Where two defense attorneys were assigned and the case was tried three times, $500 in recoupment was well within the court's discretion.

The court acknowledged that "the odds of [defendant paying his LFOs] actually at this point is not strong," but felt that the issue would be better addressed when the collection of the LFOs begins. RP 408-9. The court also knew that the defendant had at least some resources. During trial, there was testimony that the defendant had sufficient financial resources to pay rent. 3 RP 157.When viewed in its totality, the court had

sufficient information to make an individualized inquiry into the defendant's financial circumstances and plainly considered that information before imposing minimal LFOs.

D. CONCLUSION.

The trial court properly denied the defendant's motion to dismiss Count II, assault in the first degree, because jeopardy had not terminated on that count. The State respectfully requests that the trial court be affirmed.

DATED: October 26, 2015.

MARK LINDQUIST
Pierce County
Prosecuting Attorney

Thomas C. Roberts
Deputy Prosecuting Attorney
WSB # 17442

Certificate of Service:
The undersigned certifies that on this day she delivered ~~by U.S.~~ mail or ABC-LMI delivery to the attorney of record for the ~~appellant and appellant~~ c/o his attorney true and correct copies of the document to which this certificate is attached. This statement is certified to be true and correct under penalty of perjury of the laws of the State of Washington. Signed at Tacoma, Washington, on the date below.

10.26.15 Theresa Kar
Date Signature

PIERCE COUNTY PROSECUTOR

October 26, 2015 - 2:18 PM

Transmittal Letter

Document Uploaded: 4-471833-Respondent's Brief.pdf

Case Name: St. v. Rubedew
Court of Appeals Case Number: 47183-3

Is this a Personal Restraint Petition? Yes ■ No

The document being Filed is:

Designation of Clerk's Papers Supplemental Designation of Clerk's Papers

Statement of Arrangements

Motion: ____

Answer/Reply to Motion: ____

■ Brief: __Respondent's__

Statement of Additional Authorities

Cost Bill

Objection to Cost Bill

Affidavit

Letter

Copy of Verbatim Report of Proceedings - No. of Volumes: ____
Hearing Date(s): _____

Personal Restraint Petition (PRP)

Response to Personal Restraint Petition

Reply to Response to Personal Restraint Petition

Petition for Review (PRV)

Other: _____

Comments:

No Comments were entered.

Sender Name: Therese M Kahn - Email: tnichol@co.pierce.wa.us

A copy of this document has been emailed to the following addresses:

SCCAttorney@yahoo.com