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Supreme Court No. 96197-2
(COA No. 76408-0-I)

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

State of Washington,

Respondent,

v.

Christopher Shawn Dichesare,

Appellant.

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

PETITION FOR REVIEW

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A. IDENTITY OF PETITIONER AND COURT OF APPEALS DECISION

Pursuant to RAP 13.4(b)(1), Christopher Shawn Dichesare, petitioner here and appellant below, asks this Court to accept review of a decision issued on July 16, 2018. A copy of this decision is attached to this petition.

B. ISSUE PRESENTED FOR REVIEW

In *State v. Gunderson*, 181 Wn.2d 916, 337 P.3d 1090 (2014), this Court determined that evidence improperly admitted under ER 404(b) prejudiced the defendant *even though* the other evidence produced at trial may have been sufficient to find defendant guilty. And in *State v. Ashley*, 186 Wn.3d 32, 375 P.3d 673 (2016), this Court found that evidence improperly admitted under ER 404(b) was not prejudicial in circumstances where the evidence was already admitted for a proper purpose.

Here, the trial court admitted evidence of alleged prior threats to kill without conducting ER 404(b)'s required analysis on the record. The Court of Appeals correctly concluded that even if the court had conducted the required analysis, the alleged prior threats to kill were inadmissible under ER 404(b). However, relying on *Gunderson* and *Ashley*, the court

concluded the court's error was harmless because it believed the evidence presented at Mr. Dichesare's trial sufficiently established his guilt.

But *Gunderson* requires courts to focus on the potential prejudicial effect of the improperly admitted evidence rather than assess whether the evidence was sufficient to support the defendant's conviction. And unlike in *Ashley*, here, the improperly admitted evidence was never admitted for a proper purpose.

Does the Court of Appeals' opinion conflict with *Gunderson* and *Ashley*? RAP 13.4(b)(1).

C. STATEMENT OF THE CASE

On June 19, 2016, Christopher Dichesare, Mr. Dichesare's children, and Winter Kirby (Mr. Dichesare's girlfriend at the time) went to Shawn Dichesare's home to celebrate Father's Day. 3RP 112. Shawn Dichesare is Mr. Dichesare's father. 3RP 123. Unfortunately, Shawn¹ asked his son to leave his house a couple of hours into the celebration after the two had an argument. 3RP 124, 128. After Mr. Dichesare left his father's house, Shawn and other family members noticed bruises on Ms. Kirby's face and arms. 3RP 118, 129, 137. However, Mr. Dichesare's family members did not see any bruises on Ms. Kirby's neck. 3RP 129,

¹ Here, Mr. Dichesare uses his father's first name merely to distinguish the two. No disrespect is intended.

137. These observations prompted a family member to call the police later that evening and request a welfare check for Ms. Kirby. 3RP 141.

At around 9 p.m., police officers arrived at Ms. Kirby's apartment to conduct the welfare check. 3RP 173. The police observed bruising in several areas of Ms. Kirby's body, though the police did not observe any bruising on the sides of Ms. Kirby's neck. 3RP 176-77, 181, 193. During the welfare check, Ms. Kirby alleged that on June 15, 2016, Mr. Dichesare choked her with both hands and hit her. 3RP 197, 233; CP 190. This resulted in the State charging Mr. Dichesare with assault in the second degree (strangulation) and a domestic violence aggravator. CP 87.

Before trial, the State sought to admit evidence of prior instances of abuse and prior threats to kill to explain why Ms. Kirby did not report the alleged assault. CP 83; 3RP 86. Mr. Dichesare argued a substantial offer of proof was needed before the court admitted this evidence, and the court agreed. 3RP 86-87.

During the offer of proof, Ms. Kirby alleged that Mr. Dichesare committed multiple acts of domestic violence against her several times a week. 3RP 148. Ms. Kirby also alleged that she did not call the police on June 15, 2016, (the day of the alleged assault) because Mr. Dichesare told her multiple times that he would kill her if she reported it to the police. 3RP 148, 153, 157. Ms. Kirby also alleged that Mr. Dichesare stated on

several occasions that “if the cops showed up at [Ms. Kirby’s] house, [Mr. Dichesare] would make sure that he had a reason to go to jail.” RP 151.

After the State introduced its offer of proof, the court asked the State to argue the admissibility of Mr. Dichesare’s alleged prior acts of domestic violence and alleged prior threats to kill. 3RP 157. In turn, the State argued the evidence was relevant as to Ms. Kirby’s “credibility, her state of mind,” and added, “the jury is going to be wondering why someone who is abused or is being choked, strangled, or suffocated is not calling 911 to report those incidents.” 3RP 158.

Mr. Dichesare argued Ms. Kirby’s allegations were uncorroborated and any evidence of Mr. Dichesare’s alleged prior bad acts was unnecessary. 3RP 160-61. Mr. Dichesare proposed that Ms. Kirby simply state that she did not call the police because she was afraid and also argued Ms. Kirby’s allegations were highly prejudicial. 3RP 161.

After hearing both arguments, the court stated,

this witness can testify obviously to her own experiences, and statements made by the defendant are admissible under most circumstances, and so, the court understands that there may well be a basis for this witness to testify to not only the facts that support the charges that have been brought by the State, but also to testify that she did not, in fact, call 911 and/or seek other help and that she did not do so because of her state of mind. The next phase of the analysis from the court’s perspective is whether it is permissible to get into why she had that state of mind. To the extent she is available to testify to statements made by the defendant to her...[these] statements may well be admissible.

3RP 162.

The court then asked the State if it intended to admitted past episodes of abuse to establish a common scheme or absence of mistake “or if it is really the State’s position that this witness should be able to testify why she was fearful because [Mr. Dichesare] made statements to her before and there was a reason for her to believe those statements?” 3RP 162. Again, the State asserted the alleged statements and alleged past incidents of abuse related to Ms. Kirby’s credibility and why she did not report the assault. 3RP 163.

While the court did not admit the alleged prior instances of abuse, the court permitted Ms. Kirby to testify about the alleged threats to kill “that [were] at least recent in time” to the alleged assault. 3RP 163-64. Ultimately, Ms. Kirby related Mr. Dichesare’s alleged prior threats to kill at trial, and she explained these alleged prior threats made her fear for her life. 3RP 209-10. Additionally, she recounted her allegation that Mr. Dichesare told her he would “make sure [the police] had a reason to take him to jail” if she called the police. 3RP 211.

The jury convicted Mr. Dichesare of assault in the second degree and aggravated domestic violence. CP 24.

On appeal, Mr. Dichesare argued the court abused its discretion in admitting these alleged prior threats to kill because the court failed to undergo ER 404(b)'s required analysis on the record, and, critically, the court failed to weigh the probative value of this evidence against its highly prejudicial effect. Opinion at 4. The Court of Appeals agreed the evidence was inadmissible under ER 404(b) but concluded this error was harmless. Opinion at 4-6.

D. ARGUMENT

This Court should accept review because the Court of Appeals' opinion conflicts with this Court's opinions in *Gunderson* and *Ashley*.

This Court should accept review because the Court of Appeals' opinion conflicts with this Court's rulings in *Gunderson* and *Ashley*. RAP 13.4(b)(1).

Before a trial court admits evidence of prior bad acts for other purposes under ER 404(b), a trial court must (1) find by a preponderance of the evidence that the misconduct occurred, (2) identify the purpose for which the evidence sought is introduced, (3) determine whether the evidence is relevant to prove an element of the crime charged and (4) weigh the probative value of the evidence against its prejudicial effect on the record. *Gunderson*, 181 Wn.2d at 923. Weighing the probative value of the evidence versus its prejudicial effect is particularly important in

domestic violence cases because the risk of unfair prejudice to the defendant is very high. *Id.* at 925. To guard against this heightened prejudicial effect, this Court confines the admissibility of prior acts of domestic violence to cases where the State has established their overriding probative value. *Id.*

In *Gunderson*, the State charged the defendant with domestic violence based on a third-party's claim that the defendant hit the mother of his child. 181 Wn.2d at 918. The alleged victim told the police that no assault occurred, and her testimony at trial was consistent with her version of the events on the day of the alleged incident. *Id.* at 920. The trial court admitted evidence of prior domestic violence incidents between the defendant and the alleged victim to impeach her credibility pursuant to ER 404(b). *Id.* at 921.

After concluding this evidence was improperly admitted under ER 404(b), this Court next determined whether the introduction of this evidence was harmless error. *Id.* at 926. If the error was harmless, reversal is not required; however, if the error was harmful, reversal is required. To determine whether the erroneous introduction of evidence was harmless error, courts assess whether "within reasonable probabilities, had the error not occurred, the outcome of the trial would have been materially

affected.” *Id.* (quoting *State v. Smith*, 106 Wn.2d 772, 780, 725 P.2d 951 (1986)).

This Court held that while the evidence may have been sufficient to find the defendant guilty, it was still not harmless error for the trial court to have admitted these prior instances due to the highly prejudicial evidence of the defendant’s past history. *Id.* at 926. In other words, because the prejudice of these prior instances undoubtedly *influenced* the jury’s decision to render a guilty verdict, it *materially affected* the outcome of the trial; therefore, the error was not harmless.

Here, the Court of Appeals’ opinion conflicts with *Gunderson* because it fails to assess how the alleged threats to kill may have *influenced* the jury, regardless of the alleged strength of the evidence presented at trial. Here, the jury heard Ms. Kirby (the complainant), a young mother of three small children, recount that Mr. Dichesare allegedly threatened to kill her and threatened to have a “reason” to have the police take him away if she reported abuse. 3RP 196, 209-11. This testimony likely evoked a number of emotions, like fear for Ms. Kirby and her children’s safety and disdain for Mr. Dichesare. This may have influenced the jury to convict Mr. Dichesare to prevent him from following up on his alleged threat to kill.

Moreover, in *Ashley*, the State charged the defendant with unlawful imprisonment with domestic violence for detaining the mother of his children (the complainant) in a bathroom without her consent. 186 Wn.2d at 36. Pursuant to ER 404(b), the State admitted four specific instances of prior abuse the defendant inflicted on the complainant where she suffered injuries. *Id.* at 37. The complainant stated she did not flee from the bathroom because she was afraid of what the defendant would do to her if she tried to escape “because of [this prior abuse] history.” *Id.* The State’s purpose in admitting this evidence was to (1) prove restraint without consent by intimidation, which is an element of unlawful imprisonment; and (2) bolster the complainant’s credibility. *Id.* at 42, 47.

Because restraint without consent is an element of unlawful imprisonment, this Court found the State properly established the overriding probative value of the evidence. *Id.* at 45. However, this Court agreed the evidence of the prior abuse was inadmissible for credibility purposes. *Id.* at 48. In assessing whether the court’s admission of this evidence was harmless, this Court first noted that the evidence was *already* properly admitted for other purposes (to establish an element of the crime). *Id.*

Here, unlike in *Ashley*, the alleged prior threats to kill bore absolutely no relevance to the elements of the crime charged, yet the

prejudicial evidence entered the minds of the jurors. And unlike in *Ashley*, the court never found, with a preponderance of the evidence, that these alleged threats ever occurred. *Id.* at 41.

This Court should accept review. RAP 13.4(b)(1).

E. CONCLUSION

Based on the foregoing, Mr. Dichesare respectfully requests that this Court accept review.

DATED this 15th day of August, 2018.

Respectfully submitted,

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IN THE COURT OF APPEALS FOR THE STATE OF WASHINGTON

STATE OF WASHINGTON,)	No. 76408-0-1
)	
Respondent,)	DIVISION ONE
)	
v.)	
)	
CHRISTOPHER SHAWN DICHSARE,)	UNPUBLISHED OPINION
)	
Appellant.)	FILED: July 16, 2018
_____)	

ANDRUS, J. — Christopher Dichesare appeals his conviction for second degree assault, asserting that the trial court abused its discretion in admitting evidence that he had previously threatened his victim if she went to the police. We agree that the court failed to conduct the required ER 404(b) four-part analysis on the record and that the evidence was inadmissible to bolster the credibility of the victim. The error, however, was harmless. We affirm.

FACTS

Dichesare and his girlfriend, Winter Kirby, lived together with three young children. On June 19, 2015, Dichesare, Kirby, and the children attended a family gathering at the home of Dichesare's father. Several family members observed that Kirby had bruises on her face and arm. Kirby told Dichesare's father and uncle how she had sustained her injuries. After Dichesare and Kirby left, Dichesare's stepmother heard what had happened, called the police, and asked them to check on Kirby and the children.

During this welfare check, police officers observed Kirby's multiple bruises. A visibly emotional Kirby told the officers that, during an argument on June 15, Dichesare had hit and choked her. She consented to having the officers photograph her injuries. Following their investigation, the police arrested Dichesare. The State charged him with second degree assault by strangulation or suffocation and with the aggravating factor of committing the domestic violence assault in the presence of a minor child.

Before trial, the State moved to admit evidence that Dichesare had abused Kirby on prior occasions and had threatened to kill her if she reported the abuse to the police. The State argued that this evidence was admissible under ER 404(b) to bolster Kirby's credibility; it explained why Kirby had not reported the June 15 assault until police contacted her four days later. The trial court excluded evidence of prior abusive acts but allowed the State to introduce evidence of the threats.

At trial, Kirby testified that on June 15, she and her daughter were sitting on the sofa when Dichesare came home. Kirby and Dichesare began to argue. When she tried to get up from the sofa, Dichesare put his hand over her mouth and nose, pushed her down, and held her in that position. Kirby testified that as she attempted to get free, she struggled to breathe. When Dichesare let her go, she left the room and put her daughter to bed. When she returned, he resumed the assault. According to Kirby, she ended up on the floor with Dichesare's hands around her neck. The chokehold impaired her ability to breathe.

The State asked why Kirby did not call 911 immediately after the assault. Kirby testified that she was scared to do so because on a couple of occasions in

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the previous month, Dichesare had threatened to kill her if she went to the police. According to Kirby, Dichesare said if she called the police, “he would make sure they had a reason to take him to jail.”

The court admitted photographs of the bruises Kirby sustained on her face, chest, and legs, injuries Kirby identified as caused by Dichesare during the June 15 attack. Several of Dichesare’s family members corroborated her injuries, testifying that they too observed Kirby’s bruises when they saw her on June 19. Keith Christensen, the police officer who performed the welfare check, saw bruises on Kirby’s forehead, chin, neck, arm, shoulder and leg—the injuries he photographed on June 19. Officer Butch Rockwell also observed these injuries and specifically identified bruising he saw on both sides of Kirby’s trachea.

The jury convicted Dichesare as charged.

DISCUSSION

Dichesare challenges his conviction, asserting that the trial court erred in admitting evidence of the prior threats. Evidence of prior bad acts is inadmissible to prove a person’s character and that the person acted in conformity with that character. State v. Gresham, 173 Wn.2d 405, 420, 269 P.3d 207 (2012) (quoting ER 404(b)). Prior bad acts may be admissible when offered for another purpose. Id. Before admitting such evidence, the trial court must (1) find by a preponderance of the evidence that the misconduct occurred; (2) identify the purpose for which the evidence is offered; (3) determine that the evidence is relevant to an element of the crime charged; and (4) weigh the evidence’s probative value against its

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prejudicial effect. Id. The trial court must conduct this analysis on the record. State v. Foxhoven, 161 Wn.2d 168, 175, 163 P.3d 786 (2007).

We review the trial court's decision to admit or exclude evidence for abuse of discretion. Id. at 174. The trial court abuses its discretion where its decision is based on untenable grounds or reasons. Id. An abuse of discretion also occurs where the trial court fails to meet the requirements of an evidentiary rule. Id.

Dichesare contends the trial court failed to conduct the required ER 404(b) analysis, failed to find that the prior threats had probably occurred, failed to find that they were relevant to any element of the crime with which he was charged, and failed to find that the probative value of this evidence was not outweighed by its prejudicial effect. The State asserts that although the court did not explicitly recite the ER 404(b) four-part test, the record demonstrates that the trial court applied the proper analysis.

The trial court excluded evidence of Dichesare's prior assaults as more prejudicial than probative, but allowed the State to introduce evidence that Kirby was afraid to report the charged assault because Dichesare had made recent threatening statements to her. The trial court thus identified the purpose for which the State was offering the evidence. But the court failed to address on the record whether the threats occurred, their relevance to an element of the crime charged, and their probative value versus their prejudicial effect. By failing to conduct the required analysis on the record, the trial court abused its discretion.

But even if, as the State argues, the trial court applied the proper analysis, the evidence was inadmissible under ER 404(b). As indicated in Jury Instruction

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No. 7, to convict Dichesare of assault in the second degree, the jury had to find that Dichesare intentionally assaulted Kirby by strangulation or suffocation and that this assault occurred in Washington. Unlike the crime of felony harassment, where the reasonableness of a victim's fear is an element of the crime, see State v. Ragin, 94 Wn. App. 407, 411, 972 P.2d 519 (1999), the crime of assault does not require such a determination. Because a victim's state of mind is not relevant to an element of the crime charged, the trial court abused its discretion in admitting the prior threat evidence.

Nor is explaining why a victim delayed in reporting a crime a proper basis for admitting the threat evidence. Kirby's pretrial statements regarding the June 15 events were all consistent with her trial testimony. She neither recanted her story nor refused to testify at trial. There was no need to introduce evidence of Dichesare's prior threats to bolster her credibility. In State v. Gunderson, 181 Wn.2d 916, 337 P.3d 1090 (2014), the Supreme Court cautioned trial courts to be extremely careful in determining when prior acts of domestic violence may be admitted to bolster a victim's credibility. In that case, Gunderson was charged with felony violation of a no contact order after his girlfriend's mother, Bonnie, called the police to report that he had assaulted her daughter, Christina, and had driven off with her in his truck. Gunderson, 181 Wn.2d at 919. Christina, however, testified that he did not assault her. Id. at 920. The trial court admitted evidence of two prior domestic violence episodes between Gunderson and Christina to impeach Christina's credibility. Id. at 920-21.

The Supreme Court held that the trial court abused its discretion in admitting evidence of the prior domestic violence assaults because Christina had not provided inconsistent statements regarding the incident. Id. at 924. She had consistently stated that Gunderson had not hit her and that she had voluntarily gotten into his truck. Id. at 925. The Supreme Court limited the admissibility of prior domestic violence incidents to cases where “the State has established their overriding probative value, such as to explain a witness’s otherwise inexplicable recantation or conflicting accounts of events.” Id. See also State v. Ashley, 186 Wn.2d 32, 47, 375 P.3d 673 (2016) (trial court erred in admitting evidence of prior instances of domestic violence for the sole purpose of bolstering a victim’s credibility in the absence of evidence of prior inconsistent statements).

Here, it was the State who first raised the issue of Kirby’s delay in reporting; Dichesare did not open the door to this issue through cross examination. There was no evidence that Kirby had ever denied the assault had occurred or that her various reports about the attack were inconsistent. Thus, the State did not establish an “overriding probative value” of this evidence.

The State contends, however, that any error in admitting the evidence was harmless. We agree in this case. Evidentiary errors under ER 404(b) are subject to harmless error analysis. State v. Jackson, 102 Wn.2d 689, 695, 689 P.2d 76 (1984). The error is grounds for reversal only if, within reasonable probabilities, the error materially affected the outcome of the trial. Id. To make this assessment, we measure the admissible evidence of guilt against the prejudice caused by the improperly admitted testimony. State v. Bourgeois, 133 Wn.2d 389, 403, 945 P.2d

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1120 (1997). The error is harmless where the improper evidence is minor in comparison to the evidence as a whole. Id.

Dichesare relies on Gunderson to argue that the error was not harmless. The Supreme Court held that the ER 404(b) error in Gunderson required reversal because there was minimal evidence that Gunderson had, in fact, assaulted Christina. Although Bonnie had reported an assault when she called 911 and in a subsequent statement to police, she admitted at trial that she had not actually seen Gunderson hitting Christina, her memory was “kind of a big blur,” and Gunderson may have merely been defending himself. Gunderson, 181 Wn.2d at 919-20. Thus, her panicked statement to a 911 dispatcher and to the police contrasted starkly both with her trial testimony and with the consistent version of events Christina provided. Id. at 926.

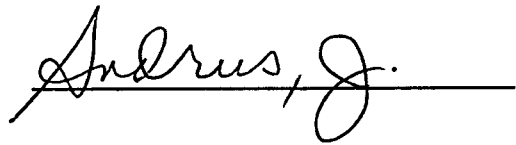
In contrast, the Supreme Court in Ashley held that erroneously admitting ER 404(b) evidence to bolster a victim’s credibility was harmless because the victim had never contradicted herself, weakening any claim she was not truthful, the victim had told the same story to the police shortly after the incident, undermining any claim of recent fabrication, and her story made sense in light of the other evidence in the record. 186 Wn.2d at 47.

This Court finds Ashley to be the more analogous precedent. In this case, as in Ashley, Kirby consistently reported that Dichesare had assaulted her. She never contradicted herself—to family members, to the police, or to the jury. Unlike in Gunderson, there was objective, photographic evidence that an assault had actually occurred. The jury observed Kirby’s bruises in the photographs. Members

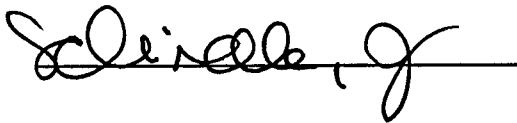
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of Dichesare's family and Officers Christensen and Rockwell saw the injuries within days of the assault and the bruises were consistent with Kirby's account. Measuring this testimony and the photographic evidence against the prejudicial effect of the evidence of Dichesare's threats, we conclude that it is not reasonably probable that the error materially affected the outcome of the trial. The error was harmless.

Affirmed.

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WE CONCUR:

A handwritten signature in cursive script, appearing to read "[unclear] J.", written over a horizontal line.A handwritten signature in cursive script, appearing to read "[unclear] J.", written over a horizontal line.

DECLARATION OF FILING AND MAILING OR DELIVERY

The undersigned certifies under penalty of perjury under the laws of the State of Washington that on the below date, the original document **Petition for Review to the Supreme Court** to which this declaration is affixed/attached, was filed in the **Court of Appeals** under **Case No. 76408-0-I**, and a true copy was mailed with first-class postage prepaid or otherwise caused to be delivered to the following attorney(s) or party/parties of record at their regular office or residence address as listed on ACORDS:

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