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NO. 98717-3

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

v.

OSCAR CHURAPE-MARTINEZ,

Petitioner.

ON DISCRETIONARY REVIEW FROM
THE COURT OF APPEALS, DIVISION I
Court of Appeals No. 79565-1-I
San Juan County Superior Court No. 18-1-05047-0

ANSWER TO PETITION FOR REVIEW

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This brief was served, as stated below, via U.S. Mail or the recognized system of interoffice communications, *or, if an email address appears to the left, electronically*. I certify (or declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED September 11, 2020, Port Orchard, WA



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TABLE OF CONTENTS

I. IDENTITY OF RESPONDENT.....1

II. COURT OF APPEALS DECISION.....1

III. COUNTERSTATEMENT OF THE ISSUES.....1

IV. STATEMENT OF THE CASE.....2

 A. PROCEDURAL HISTORY.....2

 B. FACTS2

V. ARGUMENT.....9

 THIS COURT SHOULD DENY REVIEW OF THE COURT OF APPEALS DECISION BECAUSE CHURAPE-MARTINEZ FAILS TO SHOW ANY CONFLICT BETWEEN THE OPINION BELOW AND ANY ESTABLISHED PRECEDENT.....9

 1. Churape-Martinez has failed to show that any conflict exists that would justify acceptance of review under RAP 13.4(b).9

 2. The allegation in the information regarding specific property that was the subject of malicious mischief was not required to be included in the to-convict instruction.9

 3. Churape-Martinez failed to show prejudice from the prosecutor’s brief misstatement regarding the law of burglary.....13

VI. CONCLUSION.....17

TABLE OF AUTHORITIES

CASES

<i>State v. Brown</i> , 45 Wn. App. 571, 726 P.2d 60 (1986)	13
<i>State v. Churape-Martinez</i> , No. 79565-1-I (June 1, 2020).....	1, 9, 13
<i>State v. Emery</i> , 174 Wn.2d 741, 278 P.3d 653 (2012)	14
<i>State v. Garcia</i> , 179 Wn.2d 828, 318 P.3d 266 (2014)	13, 16
<i>State v. Hickman</i> , 135 Wn.2d 97, 954 P.2d 900 (1998)	11
<i>State v. Jain</i> , 151 Wn. App. 117, 210 P.3d 1061 (2009)	12
<i>State v. Pelkey</i> , 109 Wn.2d 484, 745 P.2d 854 (1987)	11
<i>State v. Pierce</i> , 169 Wn. App. 533, 280 P.3d 1158 (2012)	15
<i>State v. Schaffer</i> , 63 Wn. App. 761, 822 P.2d 292 (1991)	12
<i>State v. Smith</i> , 131 Wn.2d 258, 930 P.2d 917 (1997)	11
<i>State v. Thorgerson</i> , 172 Wn.2d 438, 258 P.3d 43 (2011)	15
<i>State v. Vangerpen</i> , 125 Wn.2d 782, 888 P.2d 1177 (1995)	11

RULES

ER 609	16
RAP 13.4.....	10
RAP 13.4(b)	1, 9

I. IDENTITY OF RESPONDENT

The respondent is the State of Washington. The answer is filed by San Juan County Special Deputy Prosecuting Attorney RANDALL A. SUTTON.

II. COURT OF APPEALS DECISION

The State respectfully requests that this Court deny review of the Court of Appeals unpublished decision in *State v. Churape-Martinez*, No. 79565-1-I (June 1, 2020), a copy of which is attached to the petition for review.

III. COUNTERSTATEMENT OF THE ISSUES

The Court of Appeals, in conformity with well-established principles held (1) that the evidence was sufficient to support his conviction for residential burglary, (2) that the evidence was sufficient to support his conviction for malicious mischief, (3) that malicious mischief jury instruction did not allow conviction of an uncharged crime, and (4) that Churape-Martinez had failed to show any prejudice from the prosecutor's unobjected-to misstatement regarding the elements of burglary. Churape-Martinez seeks review only of the latter two holdings. The question presented is thus whether this Court should decline to accept review because none of the criteria set forth in RAP 13.4(b) are met, because Churape-Martinez fails to show that the Court of Appeals

decision conflicts with any decision of this Court or the Court of Appeals.

IV. STATEMENT OF THE CASE

A. PROCEDURAL HISTORY

Oscar Churape-Martinez was charged by information filed in San Juan County Superior Court with residential burglary (domestic violence), unlawful imprisonment (domestic violence), attempting to elude a pursuing police vehicle, and third-degree malicious mischief. CP 4-5. A jury found Churape-Martinez guilty as charged. CP 48-53. The court imposed standard-range sentences totaling 17 months. CP 69-70.

B. FACTS

Mikkiah Bradley was living at her boyfriend Jacob Morrison's home in a trailer park in Friday Harbor. 1TRP 127.¹ Her sister, MJB, lived there also. 1TRP 128. MJB was 16 at the time. 1TRP 128.

Churape-Martinez was MJB's boyfriend. 1TRP 130. They had been dating for a month or two. 1TRP 130. Bradley had last seen him a day or two before the incident. 1TRP 131. At that time, she and Morrison told Churape-Martinez that they did not want him coming around because there was too much bickering and "things with [MJB] were beginning to show." 1TRP 131.

¹ The record contains two separately paginated sets of volumes of reports of proceedings. The two volumes of trial reports covering January 29 and 30, 2019, are referred to in this brief as 1TRP and 2TRP, respectively. The remaining four volumes are not referenced

MJB was completely worn out the day of the incident. 1TRP 129. They had both been going through a lot, and she needed to sleep. 1TRP 129. MJB went to sleep around 3:00 or 4:00 p.m. 1TRP 130. Bradley left several hours after her sister fell asleep, leaving her some cigarettes and a note. 1TRP 129. The note told MJB that they were going to a friend of Morrison's and that they would be back soon. 1TRP 132. They locked the door before leaving. 1TRP 132, 133.

Right before they left Bradley saw Churape-Martinez. 1TRP 132. He was across the street helping a neighbor with his truck, which Bradley thought was funny. 1TRP 132. MJB had just told Bradley that she had been having trouble with Churape-Martinez.

They were gone for a few hours. 1TRP 133. When Bradley returned "everything was messed up." 1TRP 129. It was very scary for Bradley. 1TRP 129. The house had been broken into and MJB was gone. 1TRP 133. The doorknob and the lock were broken. 1TRP 136. On the porch, a chair and a pot were knocked over, and woodchips were messed up. 1TRP 140. Bradley ran into MJB's room, and she saw that the mirror was broken. 1TRP 136. It looked like MJB had been thrown around, and the cigarettes and note were still where Bradley had left them. 1TRP 136.

After she realized MJB was not there, Bradley told Morrison to

herein.

call 911 and immediately ran down to Churape-Martinez's parents' house, which was in the same trailer park. 1TRP 142. They were not there. 1TRP 142.

Morrison confirmed that Churape-Martinez did not have permission to come into the home when he was not there. 1TRP 152. The day of the incident, Morrison also saw Churape-Martinez at the neighbor's house. 1TRP 152. Morrison had just installed a new door latch on the door that day. 1TRP 153, 161. They locked it when they left MJB sleeping in his bed. 1TRP 154.

When they arrived home, there was splintered wood everywhere and the latch was gone. 1TRP 155. The living room otherwise looked normal. 1TRP 155.

The bedroom was "trashed." 1TRP 156. The mirror was broken, as was a fan. 1TRP 156. When they realized MJB was not there, they started making calls and went to Churape-Martinez's house and other places MJB might be. 1TRP 157.

MJB was 16 at the time of trial. 1TRP 167. Churape-Martinez was her boyfriend. 1TRP 168. She testified that she still cared about him and wanted to testify because it would "be good for him." 1TRP 169.

She had gone to her sister's house because she was feeling ill and

needed to sleep. 1TRP 170. She had had an argument with Churape-Martinez the night before because “he was upset with [her] because [she] had made some bad decisions.” 1TRP 170. She was “using,” which he did not like. 1TRP 170. Churape-Martinez kept her “on a really short leash”:

Yeah. It was -- he had me pretty tied up, but it's good. I kind of needed something like that. I was rebelling. So I, at the time, was -- I was -- I just didn't like it. At the -- I didn't like it because I didn't like not having space, you know.

1TRP 170-71.

According to MJB, he broke through the door because no one was answering and “he was freaked out.” 1TRP 171. He was by her bed when she woke up. 1TRP 172. He was angry and told she was not supposed to be there because it was a bad place to be. 1TRP 172. Then he said, “let's go. You're leaving.” 1TRP 172. She “deep down” wanted to go with him but refused because she was “so stubborn” and said “screw you.” 1TRP 172. They argued about her going. 1TRP 172. He broke the mirror. 1TRP 173. The door was also “pretty beat up.” 1TRP 173.

MJB could not say how long they had argued: “I kind of blocked out a lot of it.” 1TRP 174. She admitted that she probably felt a little threatened at the time. 1TRP 174. He mentioned a gun. 1TRP 175. Although she testified that at the time of trial she did not believe that he had a gun, she had some concern at the time:

I don't believe now he had a gun. I was -- when someone

says, I have a gun, it's like, yeah, there's a possibility they have -- they have a gun in the car. There's a possibility, you know.

1TRP 176. He did tell her he had a gun. 1TRP 176. She did tell the detective that it was possible he had a gun. 1TRP 176.

She left the house by walking. 1TRP 177. She was barefoot. 1TRP 177. They got in his car and drove away. 1TRP 177. An argument ensued because he had been drinking and was pretty intoxicated and was driving too fast. 1TRP 177.

MJB denied that Churape-Martinez shoved her into the car: "he opened the door for me. That's all he did." 1TRP 178. They drove out past the airport. 1TRP 178. She wanted to jump out of the car. 1TRP 178. She told him she wanted to get out of the car:

A. I wanted to jump out of the car.

Q. Why did you want to jump out of the car.

A. I don't know. Because I was -- I just didn't want to be in the car.

Q. Did you tell him to let you out of the car?

A. Yeah. But he obviously -- there's -- yeah. I mean, he was -- again, I'm not making any excuses. But...

Q. Okay

A. Yeah, I wanted to make -- I wanted to jump out of the car.

Q. All right. Did you ask him to take you to your mom's house?

A. Yeah. That would not have been the best decision.

Q. Okay. But you wanted to go to your mom's?

A. No. But I was -- I passed -- I was like, Take me to my mom's house. I was like -- just like, you know, Take me to my mom's house. Like -- but, really, me and my mom don't really click. So...

1TRP 178-79.

They continued driving and arguing and he almost hit an oncoming car. 1TRP 179-81. He was driving around 100 miles per hour. 1TRP 181. She saw flashing police lights behind them. 1TRP 182. He turned down a dirt road. 1TRP 182. They pulled in at a trailer belonging to someone they knew, and she called her mother to come get them. 1TRP 183. She told her mother that Churape-Martinez said he had a gun and the police were after them. 1TRP 183. She also told her that he had broken down Morrison's door. 1TRP 183. Her mother called the police. 1TRP 183.

MJB's mother testified that when MJB called, she sound different: scared, concerned. 1TRP 195. The first thing she said was that she was "really scared":

"She said, Mom, I was sleeping at Oscar's and -- I mean, at Jacob's, I'm sorry, and Oscar woke -- I woke up to hearing banging and the -- and then she said, I'm just really scared. He made me get into the car, and he was -- and there was cops. And -- and he said that he was taking me with him. And I said, Let me out, and he would not let me out. And now we're here."

1TRP 196. MJB told her that although she had not seen it, Churape-Martinez said he had a gun. 1TRP 198. While the mother was talking to MJB she had her husband call 911 and give them the address. 1TRP 198.

Sheriff's Detective Lachlan Buchanan arrived at the scene and saw MJB and her father standing in the driveway. 1TRP 202. Churape-Martinez was under arrest and in the police cars. 1TRP 202. They took MJB to the station to interview her. 1TRP 202.

Buchanan also spoke with Churape-Martinez at the station. He said he was at a friend's place working on a car and he went to MJB's house because "he was pissed off 'cause they used dope there." 1TRP 209. He said that the door was not broken, but that he did break the mirror because he was angry about the drug use. 1TRP 209.

A number of witnesses also testified regarding the police pursuit. A neighbor testified about Churape-Martinez's car going by on the dirt road in front of his house with no lights on, followed by police cars. 2TRP 239-40. His surveillance video camera caught the incident, and the video was played for the jury. 2TRP 243. Another woman detailed how Churape-Martinez almost ran her off the road into a ditch. 2TRP 247. Finally, two deputies detailed their pursuit of Churape-Martinez and clocking him on radar doing 85 miles per hour in a 45 zone. 2TRP 263-64.

After he was arrested, Churape-Martinez denied that he had driven the car. 2TRP 277. He was argumentative and less than cooperative. 2TRP 291. Churape-Martinez told a story about his car having been stolen. 2TRP 293. MJB was upset and shaking and did not want to talk in front of

V. ARGUMENT

THIS COURT SHOULD DENY REVIEW OF THE COURT OF APPEALS DECISION BECAUSE CHURAPE-MARTINEZ FAILS TO SHOW ANY CONFLICT BETWEEN THE OPINION BELOW AND ANY ESTABLISHED PRECEDENT.

1. *Churape-Martinez has failed to show that any conflict exists that would justify acceptance of review under RAP 13.4(b).*

RAP 13.4(b) sets forth the considerations governing this Court's acceptance of review:

A petition for review will be accepted by the Supreme Court only: (1) If the decision of the Court of Appeals is in conflict with a decision of the Supreme Court; or (2) If the decision of the Court of Appeals is in conflict with a published decision of the Court of Appeals; or (3) If a significant question of law under the Constitution of the State of Washington or of the United States is involved; or (4) If the petition involves an issue of substantial public interest that should be determined by the Supreme Court.

As to his first claim, Churape-Martinez argues only that the opinion conflicts with a published opinion of the Court of Appeals. He fails to address the reasons why the Court of Appeals rejected the application of the case in question to his claim, however. He further fails to identify any basis at all under RAP 13.4 as to why this Court should review his second claim. As such, he fails to show why review should be granted.

2. *The allegation in the information regarding specific property that was the subject of malicious mischief was*

not required to be included in the to-convict instruction.

As he did in the Court of Appeals, Churape-Martinez claims that because the information only identified the door, frame or mirror in the information, the to-convict instruction should also have referred to these items. The Court of Appeals rejected this claim because “Churape-Martinez’s argument relie[d] on conflation of the respective purposes, and requirements, applicable to the information and to the jury instructions.” *Opinion*, at 9. This conclusion was correct.

The basis of Churape-Martinez’s claim was that the elements instruction should have reflected the specific pieces of property alleged in the charging document. He cited no relevant authority for the proposition that each fact in a charging document had to be incorporated into the elements instruction.

Instead, Churape-Martinez conflated two disparate legal principles. The first was the law of the case doctrine as applied to jury instructions. That doctrine holds that surplus allegations only become an additional element of the case when they are included in the jury’s instructions. *State v. Hickman*, 135 Wn.2d 97, 102-103, 954 P.2d 900 (1998). Thus, if the State undertakes to prove a specific fact by way of the elements instruction, the evidence must support that factual determination even if the fact is not an element of the offense. *Hickman*, 135 Wn.2d at 101-105.

This is a specific application of the law of the case doctrine. *Hickman*, 135 Wn.2d at 102.

The second principle on which Churape-Martinez relied involves the notification function of a charging document. The purpose of a charging document is to provide notice to the defendant of the charge against him and its factual basis. *State v. Pelkey*, 109 Wn.2d 484, 491, 745 P.2d 854 (1987). The charging document is not a concern for the jury. Its primary purpose is to alert the defendant to the charge and underlying conduct at issue. *Id.* From the jury's perspective, the case is contained in the elements instruction and any accompanying definitional instructions. *State v. Smith*, 131 Wn.2d 258, 262-263, 930 P.2d 917 (1997).

“Jury instructions and charging documents serve different functions.” *State v. Vangerpen*, 125 Wn.2d 782, 788, 888 P.2d 1177 (1995). The Court of Appeals found this observation was dispositive of Churape-Martinez's claim. *Opinion*, at 9. Instead of arguing that the charging document misled him about the actions that constituted the crime with which he was charged, Churape-Martinez argued that those factual allegations needed to be included in the charging document lest he be convicted of a crime other than that with which he was charged.

The elements of the crime of third-degree malicious mischief as charged were that Churape-Martinez “on or about September 26, 2018, ...

knowingly and maliciously caused physical damage to the property of another.” CP at 38. These elements reflected those required by the statute and the date of the offense identified in the charging document. CP at 5. The evidence adduced at trial showed only one continuing course of conduct where Churape-Martinez broke into the Morrison’s home and damaged property therein. *See State v. Schaffer*, 63 Wn. App. 761, 770, 822 P.2d 292 (1991), *aff’d*, 120 Wn.2d 616 (1993). There was no evidence that Churape-Martinez damaged property at any other location on that date.

This is a far cry from the case Churape-Martinez relied on now and in the Court of Appeals. In *State v. Jain*, 151 Wn. App. 117, 210 P.3d 1061 (2009), the defendant had been charged with two counts of money laundering involving the transfer of two specific pieces of real estate, but the evidence at trial established that he transferred seven different properties that same day. *Jain*, 151 Wn. App. at 120-121, 123. Because there were seven possible money laundering offenses, although only two were charged, the defendant’s right to unanimous jury verdicts was infringed by the failure to require either a unanimity instruction or to elect which property transfers the prosecutor was relying on. *Jain*, 151 Wn. App. at 124. The *Jain* court, however, expressly rejected the argument made here by Churape-Martinez: “There simply is no requirement for the

‘to convict’ instructions to contain a statement of the type of specified unlawful activity underlying the charge of money laundering.” *Jain*, 151 Wn. App. at 128-129.

This case is not *Jain*. There was no evidence indicating multiple incidents of malicious mischief by Churape-Martinez on September 26, 2018. The prosecutor was thus not required to identify (by elements instruction, unanimity instruction, or election during closing argument) which instance of trafficking in stolen property he was relying on. The Court of Appeals thus properly rejected Churape-Martinez’s reliance on *Jain* and *State v. Brown*, 45 Wn. App. 571, 726 P.2d 60 (1986). *Opinion*, at 12-13. Churape-Martinez fails to show any conflict warranting this Court’s review.

3. *Churape-Martinez failed to show prejudice from the prosecutor’s brief misstatement regarding the law of burglary.*

Relying on *State v. Garcia*, 179 Wn.2d 828, 849, 318 P.3d 266 (2014), Churape-Martinez argued below that the prosecutor’s discussion of the elements of burglary wherein she suggested that trespass could be the underlying crime was misconduct warranting reversal. However, given that there was no objection below to the argument, the Court of Appeals properly found that he had failed to meet his high burden of showing prejudice.

To establish prosecutorial misconduct, a defendant must show that the prosecutor's remarks were improper and prejudicial. *State v. Emery*, 174 Wn.2d 741, 756, 278 P.3d 653 (2012). "Once a defendant establishes that a prosecutor's statements are improper, we determine whether the defendant was prejudiced under one of two standards of review. If the defendant objected at trial, the defendant must show that the prosecutor's misconduct resulted in prejudice that had a substantial likelihood of affecting the jury's verdict." *Emery*, 174 Wn.2d at 760. If the defendant failed to object at trial, the defendant waives any error, unless the prosecutor's remarks were so flagrant and ill intentioned that no instruction could have cured the resulting prejudice. *Emery*, 174 Wn.2d at 760–61. "Under this heightened standard, the defendant must show that (1) 'no curative instruction would have obviated any prejudicial effect on the jury' and (2) the misconduct resulted in prejudice that 'had a substantial likelihood of affecting the jury verdict.'" *Emery*, 174 Wn.2d at 761 (*quoting State v. Thorgerson*, 172 Wn.2d 438, 455, 258 P.3d 43 (2011)). This Court reviews a prosecutor's improper remarks during closing in the context of the entire argument, the issues in the case, the evidence addressed in the argument, and the instructions to the jury. *State v. Pierce*, 169 Wn. App. 533, 552, 280 P.3d 1158 (2012).

The State conceded below that the prosecutor briefly misstated the

law. *Brief of Respondent*, at 19. It nevertheless argued that the present case was clearly distinguishable from *Garcia*.

In the present case, there was no objection to the argument at trial. The trial court specifically instructed the jury to disregard arguments not supported by the law as given in the instructions. CP 23. The court also properly instructed the jury as to the definitions and elements of burglary. CP 32, 33. Further, despite the comment that Churape-Martinez now objects to, the prosecutor emphasized proper underlying crimes in her initial closing:

Putting Ms. Bradley in -- threatening her and taking control of her person, the crime of unlawful imprisonment, is a crime against a person therein.

Breaking the mirror in the home is another crime. Breaking the fan, trashing the home, any of those actions that he took in that home constitute the crime of residential burglary because, as Mr. Morrison told you, he did not have license or privilege to enter or be in that home without him there.

2TRP 321-22. Finally, had Churape-Martinez objected at trial a simple instruction could have corrected the misstatement.

The problem in *Garcia* was that the prosecutor's comments "magnified" the prejudice from the improper admission under ER 609 of prior burglary convictions, requiring reversal. *Garcia*, 179 Wn.2d at 846-49. Nevertheless, under circumstances comparable to the present case, the Court in *Garcia* held that reversal would not have been required:

Alone, the prosecutor's misstatement is not a reversible error. If a defendant fails to object to the prosecutor's error at trial, the error is waived unless the defendant "establishes that the misconduct was so flagrant and ill intentioned that an instruction would not have cured the prejudice." *In re Glasmann*, 175 Wn.2d at 704, 286 P.3d 673. Garcia fails to establish that an instruction could not have cured the resulting prejudice. The trial court instructed the jury to disregard arguments not supported by the law as given in the jury instructions. It also instructed the jury as to the correct elements of burglary.

Garcia, 179 Wn.2d at 849 n.1.

Churape-Martinez failed to object to the prosecutor's comments. Had he done so, the misstatement could easily have been cured. Further, as noted in the quoted passage in *Garcia*, the trial court cautioned that arguments contrary to the law given in the instructions should be disregarded, and gave correct instructions regarding residential burglary. As such, the Court of Appeals properly concluded that Churape-Martinez failed to show the prejudice required to reverse:

In light of the abundant evidence supporting the jury's guilty verdict, and in light of the jury's proper instruction on the elements of residential burglary, Churape-Martinez does not show any prejudice resulting from the asserted instance of prosecutorial misconduct. Thus, his claim fails.

Opinion, at 15.

In his present petition, Churape-Martinez fails to even cite a case he alleges conflicts with the opinion below on this issue. Nor does he cite any other basis upon which review could be granted. His petition should

be denied.

VI. CONCLUSION

For the foregoing reasons, the State respectfully requests that the Court deny Churape-Martinez's petition for review.

DATED September 11, 2020.

Respectfully submitted,

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A handwritten signature in black ink, appearing to read 'RS', with a long horizontal line extending to the right.

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