

FILED
8-11-16

Court of Appeals
Division I
State of Washington

No. 74526-3-I

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION ONE

STATE OF WASHINGTON,

Respondent,

v.

DONALD JANEL LEGRONE,

Appellant.

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

APPELLANT'S OPENING BRIEF

MAUREEN M. CYR
Attorney for Appellant

WASHINGTON APPELLATE PROJECT
1511 Third Avenue, Suite 701
Seattle, Washington 98101
(206) 587-2711

TABLE OF CONTENTS

A. ASSIGNMENTS OF ERROR 1

B. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR 1

C. STATEMENT OF THE CASE..... 2

D. ARGUMENT..... 9

1. Legrone’s constitutional right to a unanimous jury verdict was violated because the State did not prove one of the charged alternative means of first degree burglary and the jury was not instructed it must be unanimous as to the means 9

a. The constitution requires unanimous jury verdicts in criminal cases 9

b. The State alleged alternative means of committing burglary in the first degree..... 11

c. The State did not prove the “unlawful entry” alternative means 12

d. Reversal is required because the jury was instructed on an alternative means the State did not prove and the record contains no particularized expression of jury unanimity 15

2. The judgment and sentence for the misdemeanor conviction must be corrected to reflect that the jury did not find the crime was a “domestic violence” offense 16

3. Any request that costs be imposed on Legrone for this appeal should be denied because he does not have the present or likely future ability to pay them 17

E. CONCLUSION 19

TABLE OF AUTHORITIES

Constitutional Provisions

Const. art. I, § 219

Washington Cases

In re Pers. Restraint of Sarausad, 109 Wn. App. 824, 39 P.3d 308
(2001)..... 13

State v. Allen, 127 Wn. App. 125, 110 P.3d 849 (2005)..... 12

State v. Allen, 182 Wn.2d 364, 341 P.3d 268 (2015)..... 14

State v. Blazina, 182 Wn.2d 827, 344 P.3d 680 (2015) 19

State v. Cordero, 170 Wn. App. 351, 284 P.3d 773 (2012)..... 11

State v. Cronin, 142 Wn.2d 568, 14 P.3d 752 (2000) 13

State v. Kintz, 3 169 Wn.2d 537, 238 P.3d 470, 477-78 (2010) 10

State v. Klimes, 117 Wn. App. 758, 73 P.3d 416 (2003) 11

State v. Nolan, 141 Wn.2d 620, 8 P.3d 300 (2000)..... 17

State v. Randhawa, 133 Wn.2d 67, 941 P.2d 661 (1997)..... 10

State v. Roberts, 142 Wn.2d 471, 14 P.3d 713 (2000) 13

State v. Smith, 159 Wn.2d 778, 154 P.3d 873 (2007) 10

State v. Thomson, 71 Wn. App. 634, 861 P.2d 492 (1993)..... 11

Statutes

RCW 9A.08.020(3)..... 13

RCW 10.73.160(1)..... 17

RCW 10.99.020 17

Rules

RAP 15.2(f)..... 18

A. ASSIGNMENTS OF ERROR

1. Donald Legrone's constitutional right to a unanimous jury verdict was violated when the State did not present sufficient evidence to prove one of the alternative means of committing the crime that was charged and presented to the jury.

2. The judgment and sentence for the misdemeanor conviction erroneously states the jury found the crime was a "domestic violence" offense.

3. If the State substantially prevails, this Court should decline to award appellate costs due to Legrone's inability to pay.

B. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR

1. The state constitutional right to a unanimous jury verdict requires the State to present sufficient evidence to prove beyond a reasonable doubt each alternative means of committing the crime that it presents to the jury. The record must otherwise contain a particularized demonstration of jury unanimity as to the means for which there was sufficient evidence. Here, the jury was presented with two alternative means of committing the crime but only one of those alternatives was supported by sufficient evidence. The record contains no particularized expression of jury unanimity. Must the conviction be reversed?

2. Should the judgment and sentence for the fourth degree assault conviction be corrected where it erroneously states the jury found the crime was a “domestic violence” offense?

3. Where Legrone is indigent and unable to pay legal financial obligations, should this Court deny appellate costs if the State substantially prevails?

C. STATEMENT OF THE CASE

Briana Lensegrav is a prostitute and a heroin addict.

10/05/15RP 250-52. In October 2013, she was staying at the Garden Suites hotel in Des Moines. 10/05/15RP 256, 262. She had recently decided to break up with her boyfriend, Charles Rodriguez.

10/05/15RP 262. She said Rodriguez was upset that she was seeing one of his friends, a man named “Lawa.” 10/05/15RP 264.

Lensegrav testified that on the night of October 23, 2013, she had a “date” with a john named Pete Smith at her hotel room.

10/05/15RP 266-68. She took some heroin about 15 minutes before Smith arrived. 10/05/15RP 267. According to Lensegrav, she and Smith were finishing their date when Rodriguez and a man named Donald Legrone unexpectedly entered the room through the window. 10/05/15RP 267. Lensegrav did not know Legrone and had seen him

from a distance only once before, when he had dropped Lawa off at her room a couple of days earlier. 10/05/15RP 270-74; 10/06/15RP 523.

Lensegrav testified Rodriguez was angry, upset and yelling loudly. 10/05/15RP 268. She did not know why he was upset. 10/05/15RP 268. She did not remember if he touched her, pushed her onto the bed, or grabbed her hair. 10/05/15RP 269. She did not remember anyone hitting her in the hotel room, although earlier she had told the police that Rodriguez had hit her two times in the face. 10/06/15RP 354, 383-84, 387-90. She said Smith ran out the door and Rodriguez ran out after him. 10/05/15RP 269. She did not see any physical contact between Rodriguez and Smith. 10/05/15RP 269, 286.

Lensegrav said Rodriguez soon returned to the room and was still angry and loud. 10/05/15RP 287. By contrast, Legrone was calm and treated her kindly. 10/05/15RP 288. Rodriguez was in the room for only a couple of minutes then left through the window. 10/05/15RP 289, 294. Lensegrav did not recall any conversation between Legrone and Rodriguez. 10/05/15RP 289. Rodriguez did not say anything as he left and she did not know where he was going. 10/05/15RP 290.

After Rodriguez left, Legrone calmed Lensegrav down. 10/05/15RP 291. She told him she wanted to leave because she was

afraid the police would come and she had outstanding warrants.

10/06/15RP 533, 391. Lensegrav left the hotel with Legrone willingly.

10/06/15RP 525-27. They got into his car. 10/05/15RP 295. She said Rodriguez joined them again as they were pulling out of the driveway.

10/05/15RP 295. He was still loud and yelling, while Legrone remained calm. 10/05/15RP 296-97.

According to Lensegrav, Legrone drove them some distance to a gravel road and stopped in the middle of a wooded area. 10/05/15RP

301-05. She said Rodriguez told her she was going to die and then he and Legrone took turns hitting her in the face. 10/05/15RP 302-05.

She said Rodriguez was upset with her for seeing Lawa. 10/05/15RP

306. After about an hour, Legrone started the car again and they left the area. 10/05/15RP 312. He drove to the parking lot of an apartment

complex next door to the Ramada Inn in Tukwila, where he parked.

10/05/15RP 313. Rodriguez got out of the car. 10/05/15RP 318.

Lensegrav said she and Legrone spent the night in the car, where they

each fell asleep. 10/05/15RP 321-22, 331. In the morning, they drove

around for a while, then Legrone dropped her off across the street from

the Garden Suites. 10/05/15RP 337-43.

Lensegrav went to the hospital that day. She had a small crack in her cheekbone and bruising around her eyes. 10/13/15RP 1562-63, 1573, 1585-86.

Legrone told the police he had met Lensegrav through his cousin. Exhibit 107 at 7. Legrone said on the night of October 23, 2013, he picked up Lensegrav at the Garden Suites after she had asked him to drive her to a truck at a different hotel in Kent. Exhibit 107 at 4. He picked her up and drove her to the Hawthorn Suites, where he dropped her off and left. Exhibit 107 at 4.

Legrone said he had entered Lensegrav's room through the window as usual. Exhibit 107 at 12. Lensegrav did not like people entering her room through the door because she did not want to be seen "bring[ing] too much traffic to her room." Exhibit 107 at 12. Legrone was alone when he entered her room and did not assault her at any time. Exhibit 107 at 4-5. He said she was assaulted at the Hawthorn Suites, as he had seen two black women "jump her" and beat her up after he dropped her off. 10/14/15RP 1864.

Rodriguez admitted to the police he entered Lensegrav's room that evening. Exhibit 105 at 5. He was alone. Exhibit 105 at 6, 9, 15. Lensegrav did not want to let him in so he climbed through the

window. Exhibit 105 at 5. They had an argument. Exhibit 105 at 5. Rodriguez grabbed Lensegrav and threw her onto the bed and she tried to kick or hit him back. Exhibit 105 at 19. Then he left and “that was it.” Exhibit 105 at 5, 19.

Rodriguez said he was upset to see a white man in the room with Lensegrav. Exhibit 105 at 7. When the man tried to run out of the room, Rodriguez grabbed him, but “he slipped through [his] hands out the door.” Exhibit 105 at 8. Rodriguez did not know how Lensegrav received the injuries to her face. Exhibit 105 at 18.

Smith testified that as he was finishing up his date with Lensegrav, the sliding window opened, and two men suddenly and unexpectedly entered the room. 10/22/15RP 2122. The first man looked at Lensegrav and seemed angry at her. 10/22/15RP 2123. He was yelling. 10/22/15RP 2127. She said to him, “please, Charles.” 10/22/15RP 2125. The man grabbed her by the hair and threw her on the bed. 10/22/15RP 2126-27.

Smith said the second man walked toward him. 10/22/15RP 2124. Smith went into the bathroom, but when the man walked away, Smith ran towards the door. 10/22/15RP 2128-29. He threw his arm out the door but the man kicked the door and it smashed his arm and

head. 10/22/15RP 2130. Smith was able to push the door open and run away; no one followed him. 10/22/15RP 2131.

When the police showed Smith a photo montage, he said one of two men in the montage could be the second man he had seen in the hotel room, but he could not say which. 10/14/15RP 1806-07. One of the two photos he chose was Legrone. 10/14/15RP 1806-07.

Rodriguez and Lensegrav exchanged text messages in the days and hours leading up to the incident. 10/21/15RP 1955-64. Lensegrav told Rodriguez she did not want to see him anymore because he was seeing another woman. 10/21/15RP 1957-58. He told her he was bothered she was seeing Lawa. 10/21/15RP 1958-59. He texted her, “I’m about to come break that window out, if you don’t answer that phone, and come in there and beat your ass.” 10/21/15RP 1964.

None of the text messages mentioned Legrone. The State presented no text messages—or any other communications—between Legrone and Rodriguez, or Legrone and Lensegrav, in the days leading up to the incident. 10/21/15RP 1973.

Legrone and Rodriguez were jointly charged with one count of first degree burglary, one count of first degree kidnapping, and one

count of second degree assault.¹ CP 425-28. The State alleged the three crimes were “domestic violence” offenses in regard to Rodriguez, alleging he committed the crimes against a “family or household member.” CP 425-28. The State did not allege the crimes were “domestic violence” offenses in regard to Legrone. Id.

The jury found Legrone and Rodriguez both guilty as charged of first degree burglary. CP 494; 10/30/15RP 795-96. The jury found them guilty of the lesser-degree charge of fourth degree assault rather than second degree assault. CP 490; 10/30/15RP 796-97. The jury was unable to agree on a verdict for the first degree kidnapping charge. CP 491; 10/30/15RP 787-94.

¹ Legrone was also separately charged with one count of witness tampering and two counts of possession of a controlled substance with intent to manufacture or deliver. CP 425-28. After the State rested its case, the court dismissed the witness tampering charge on the basis of insufficient evidence. 10/27/15RP 2474-75. The court severed the VUCSA charges from the other charges and later granted the State’s motion to dismiss the charges with prejudice when the State decided not to pursue them. 1/04/16RP 803.

D. ARGUMENT

1. Legrone’s constitutional right to a unanimous jury verdict was violated because the State did not prove one of the charged alternative means of first degree burglary and the jury was not instructed it must be unanimous as to the means.

a. The constitution requires unanimous jury verdicts in criminal cases.

Article I, section 21 requires a unanimous jury verdict in criminal cases.

When the State alleges a defendant committed a crime by multiple alternative means, but the jury is not instructed it must be unanimous as to the means, the State must present sufficient evidence to prove each charged means beyond a reasonable doubt in order to preserve the right to jury unanimity. State v. Owens, 180 Wn.2d 90, 95, 323 P.2d 1030 (2014).

If the evidence is insufficient to support one of the means, a particularized expression of jury unanimity is required. State v. Ortega-Martinez, 124 Wn.2d 702,707-08,881 P.2d 231 (1994). “A general verdict of guilty on a single count charging the commission of a crime by alternative means will be upheld only if sufficient evidence

supports each alternative means.” State v. Kintz, 3 169 Wn.2d 537, 552, 238 P.3d 470, 477-78 (2010).

The two purposes of the alternative means doctrine are to prevent jury confusion about what criminal conduct must be proved beyond a reasonable doubt, and to prevent the State from charging every available means authorized under a single criminal statute, lumping them together, and then leaving it to the jury to pick freely among the various means in order to obtain a unanimous verdict. State v. Smith, 159 Wn.2d 778, 789, 154 P.3d 873 (2007).

An “alternative means case” is one in which the State alleges and the jury is instructed on more than one means of committing the crime. Id. at 790. The question on review is whether substantial evidence supports each of the means presented to the jury. State v. Randhawa, 133 Wn.2d 67, 74, 941 P.2d 661 (1997). The substantial evidence test is satisfied only if the reviewing court is convinced that a rational trier of fact could have found each means proved beyond a reasonable doubt. State v. Kitchen, 110 Wn.2d 403, 410-11, 756 P.2d 105 (1988).

b. The State alleged alternative means of committing burglary in the first degree.

This is an alternative means case. The State alleged and the jury was instructed on two alternative means of first degree burglary. CP 425, 443. The jury was instructed it could find Legrone guilty if it found he either “entered or remained unlawfully in a building” with the intent to commit a crime against a person or property therein. CP 443.

Entering or remaining unlawfully in a building with an intent to commit a crime are two alternative means of committing the crime of burglary. State v. Cordero, 170 Wn. App. 351, 365, 284 P.3d 773 (2012); State v. Klimes, 117 Wn. App. 758, 768, 73 P.3d 416 (2003).

To prove the “unlawful entry” alternative, the State must prove the defendant entered a building without invitation, license or privilege, and, at the time of entry, had an intent to commit a crime therein. State v. Thomson, 71 Wn. App. 634, 637-38, 861 P.2d 492 (1993). To prove the “unlawful remaining” alternative, the State must prove: (1) the defendant’s continued presence in the building was unlawful, either because the initial entry was unlawful, or because the defendant exceeded the scope of any license or privilege to be there; and (2) the defendant had an intent to commit a crime in the building which

coincided with his conduct that rendered his presence unlawful. *Id.* at 640-41; State v. Allen, 127 Wn. App. 125, 133, 110 P.3d 849 (2005).

c. The State did not prove the “unlawful entry” alternative means.

The State did not prove the “unlawful entry” alternative means because it did not prove Legrone had an intent to commit a crime in Lensegrav’s hotel room at the time he entered. Legrone told the police he entered the room to pick up Lensegrav and take her to another hotel. Exhibit 107 at 4. He had no intent to commit any crime.

The only evidence presented to show Legrone had an intent to commit a crime in the room was Smith’s testimony that Legrone kicked the door on Smith’s arm and head as he was trying to leave. 10/22/15RP 2130. This evidence does not prove Legrone had an intent to commit a crime *at the time he entered the room*. There is no evidence that Legrone knew before he entered the room that Smith was inside. There is no evidence that Legrone intended to commit any other crime inside the room *at the time he entered*.

The evidence was also insufficient to prove Legrone was guilty of the “unlawful entry” alternative means under a theory of accomplice liability. To prove Legrone was guilty as an accomplice to Rodriguez, the State was required to prove that, with knowledge that his conduct

would “promote or facilitate the commission of *the crime*,” Legrone (1) solicited, commanded, encouraged, or requested Rodriguez to commit the crime; or (2) aided or agreed to aid Rodriguez in planning or committing the crime. CP 481 (emphasis added); RCW 9A.08.020(3).

It is well-established that “the crime” for purposes of the accomplice liability statute means “the charged offense.” State v. Roberts, 142 Wn.2d 471, 510-11, 14 P.3d 713 (2000); see also State v. Cronin, 142 Wn.2d 568, 579, 14 P.3d 752 (2000). Thus, the accomplice must “have the purpose to promote or facilitate *the particular conduct that forms the basis for the charge*” and “*will not be liable for conduct that does not fall within this purpose.*” Id. (internal quotation marks and citation omitted).

Accomplice liability is not strict liability. Roberts, 142 Wn.2d at 511. “[T]he culpability of an accomplice [does] not extend beyond the crimes of which the accomplice actually has ‘knowledge.’” Id. Thus, an accomplice is not liable for any and all offenses ultimately committed by the principal. Cronin, 142 Wn.2d at 579.

“The crime” for purposes of accomplice liability is the general charged crime, regardless of degree. In re Pers. Restraint of Sarausad, 109 Wn. App. 824, 835, 39 P.3d 308 (2001).

The State must prove the accomplice had actual and not merely constructive knowledge of the crime. State v. Allen, 182 Wn.2d 364, 371-74, 341 P.3d 268 (2015). The State must show the defendant *actually knew* the principal would commit the crime. Id.

Thus, here, the State was required to prove Legrone *actually knew* he was promoting or facilitating Rodriguez in the commission of a burglary. Id. at 374. The State was required to prove he had actual knowledge Rodriguez was unlawfully entering the room with an intent to commit a crime inside. Id.

The State did not prove Legrone was guilty as an accomplice of the “unlawful entry” alternative means of committing burglary. There was no evidence Legrone *actually knew* Rodriguez intended to commit a crime inside the hotel room. The State presented no evidence of any communications between Legrone and Rodriguez in the days leading up to the incident. The State presented no evidence of any agreement between them, or any evidence to show they had jointly planned to commit a crime inside the hotel room. There was no evidence to show Legrone was aware of the content of the text messages exchanged between Rodriguez and Lensegrav before the incident.

The only evidence of any crime committed by Rodriguez inside the hotel room was Smith's testimony that Rodriguez grabbed Lensegrav by the hair and threw her on the bed. 10/22/15RP 2126-27. The jury also heard that Lensegrav told the police Rodriguez hit her twice in the face inside the room. 10/06/15RP 387-89.

But the State presented no evidence to show Legrone knew, at the time he and Rodriguez entered the hotel room, that Rodriguez intended to assault Lensegrav inside. Thus, the State did not prove Legrone promoted or facilitated Rodriguez in unlawfully entering the room with an intent to commit a crime therein. The State did not prove Legrone was guilty as an accomplice to burglary under the "unlawful entry" alternative means.

d. Reversal is required because the jury was instructed on an alternative means the State did not prove and the record contains no particularized expression of jury unanimity.

When the jury is instructed on an alternative means the State did not prove, the conviction must be reversed unless the record contains a particularized expression of jury unanimity as to the means for which there was sufficient evidence. Ortega-Martinez, 124 Wn.2d at 707-08; Owens, 180 Wn.2d at 95.

The record does not show the jury reached unanimous agreement as to the means for which sufficient evidence was presented. The jury was not instructed it must be unanimous as to the means of committing first degree burglary. The State did not elect either of the means, and the jury returned only a general verdict of guilty. Thus, Legrone's constitutional right to jury unanimity was violated and the conviction for first degree burglary must be reversed. Ortega-Martinez, 124 Wn.2d at 707-08; Owens, 180 Wn.2d at 95.

2. The judgment and sentence for the misdemeanor conviction must be corrected to reflect that the jury did not find the crime was a “domestic violence” offense.

Legrone was convicted fourth degree assault. The judgment and sentence for the misdemeanor states he was convicted of “Assault in the Fourth Degree – Domestic Violence.” CP 538. The court also checked the box next to the finding that “domestic violence (as defined in RCW 10.99.020) was pled and proved.” CP 538.

The judgment and sentence is erroneous because it states “domestic violence” was pled and proved when it was not. The State did not allege Legrone committed any of the crimes against a family or

household member or that they were domestic violence offenses.² CP 425-27. The jury was not asked to find—and did not find—that the crimes were domestic violence offenses in regard to Legrone.

The judgment and sentence must be corrected to remove any reference to “domestic violence.”

3. Any request that costs be imposed on Legrone for this appeal should be denied because he does not have the present or likely future ability to pay them.

This Court has broad discretion to disallow an award of appellate costs if the State substantially prevails on appeal. RCW 10.73.160(1); State v. Nolan, 141 Wn.2d 620, 626, 8 P.3d 300 (2000); State v. Sinclair, 192 Wn. App. 380, 388, 367 P.3d 612, review denied, 185 Wn.2d 1034 (2016); RCW 10.73.160(1). A defendant’s inability to pay appellate costs is an important consideration to take into account in deciding whether to disallow costs. Sinclair, 192 Wn. App. at 389.

Legrone does not have a realistic ability to pay appellate costs. At sentencing, the court found Legrone was indigent and imposed only those LFOs it deemed mandatory. CP 530.

² RCW 10.99.020(5) defines a “domestic violence” offense as a crime “committed by one family or household member against another.”

The court also entered an order authorizing Legrone to seek review at public expense and appointing public counsel on appeal. As the Court noted in Sinclair, RAP 15.2(f) requires that a party who has been granted such an order of indigency is required to notify the trial court of any significant improvement in financial condition. Sinclair, 192 Wn. App. at 393. Otherwise, the indigent party is entitled to the benefits of the order of indigency throughout the review process. Id.; RAP 15.2(f).

There is no trial court record showing Legrone's financial condition has improved.

Nor is Legrone's financial situation likely to improve to the point where he will be able to pay appellate costs. Legrone was convicted of first degree burglary and fourth degree assault and is currently serving a 75-month sentence. CP 528-37. Upon his release, his criminal history will hamper his ability to find a good paying job.

Due to these circumstances, "[t]here is no realistic possibility that [Legrone] will be released from prison in a position to find gainful employment that will allow him to pay appellate costs." Sinclair, 192 Wn. App. at 393.

Imposing appellate costs on Legrone would significantly reduce any possibility of his re-entering society successfully. Id. at 391; see also State v. Blazina, 182 Wn.2d 827, 344 P.3d 680 (2015). Because Legrone is indigent and unlikely to be able to pay appellate costs, this Court should exercise its discretion and decline to award costs if the State substantially prevails on appeal.

F. CONCLUSION

The State did not present sufficient evidence to prove one of the alternative means of first degree burglary and the record contains no particularized expression of jury unanimity. Thus, the conviction must be reversed. Also, the judgment and sentence for the misdemeanor conviction must be corrected to eliminate any reference to domestic violence.

Respectfully submitted this 11th day of August, 2016.

/s/ Maureen M. Cyr

MAUREEN M. CYR (WSBA 28724)
Washington Appellate Project - 91052
Attorneys for Appellant

**IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION ONE**

STATE OF WASHINGTON,)	
)	
Respondent,)	
)	NO. 74526-3-I
v.)	
)	
DONALD LEGRONE,)	
)	
Appellant.)	

DECLARATION OF DOCUMENT FILING AND SERVICE

I, MARIA ARRANZA RILEY, STATE THAT ON THE 11TH DAY OF AUGUST, 2016, I CAUSED THE ORIGINAL **OPENING BRIEF OF APPELLANT** TO BE FILED IN THE **COURT OF APPEALS – DIVISION ONE** AND A TRUE COPY OF THE SAME TO BE SERVED ON THE FOLLOWING IN THE MANNER INDICATED BELOW:

[X] KING COUNTY PROSECUTING ATTORNEY	()	U.S. MAIL
[paoappellateunitmail@kingcounty.gov]	()	HAND DELIVERY
APPELLATE UNIT	(X)	AGREED E-SERVICE
KING COUNTY COURTHOUSE		VIA COA PORTAL
516 THIRD AVENUE, W-554		
SEATTLE, WA 98104		

[X] DONALD LEGRONE	(X)	U.S. MAIL
761115	()	HAND DELIVERY
WASHINGTON STATE PENITENTIARY	()	_____
1313 N 13 TH AVE		
WALLA WALLA, WA 99362		

SIGNED IN SEATTLE, WASHINGTON THIS 11TH DAY OF AUGUST, 2016.



X _____

Washington Appellate Project
701 Melbourne Tower
1511 Third Avenue
Seattle, WA 98101
Phone (206) 587-2711
Fax (206) 587-2710