

WASHINGTON APPELLATE PROJECT

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February 8, 2012

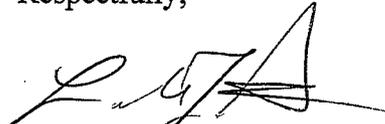
Court of Appeals, Division Two
Attention: Debbie
950 Broadway, Suite 300
Tacoma, WA 98402

Re: *State v. Etienne Choquette*, No. 41769-3-II

Dear Debbie:

As discussed on the telephone, please accept the enclosed Corrected Reply Brief for filing. The brief corrects a significant typo on page 10. Please let me know if the Court needs any other information from me.

Respectfully,



Lila J. Silverstein
Attorney at Law
Washington Appellate Project

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

STATE OF WASHINGTON,

Respondent,

v.

ETIENNE CHOQUETTE,

Appellant.

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

CORRECTED REPLY BRIEF OF APPELLANT

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A. INTRODUCTION

47-year-old Etienne Choquette, who had never before been charged with a crime, was arrested and interrogated regarding a murder in Forks. Sergeant Darryl Elmore, who subsequently resigned from the police department because he was caught lying about a relationship with a person involved in a murder-suicide, interviewed Mr. Choquette over a period of two days. The first day, Mr. Choquette steadfastly maintained his innocence. At the end of the interview before he was booked into jail, he said he needed his multiple-sclerosis medications, someone to care for his dog, and “obviously I’m going to need an attorney.”

The requests for medications and canine care were honored, but the request for counsel was not. Without providing an attorney, Sergeant Elmore returned the next day and elicited a confession from Mr. Choquette. The trial court admitted the statements over Mr. Choquette’s objections.

It would be difficult to find a case more similar to Edwards v. Arizona, 451 U.S. 477, 101 S.Ct. 1880, 68 L.Ed.2d 378 (1981). The U.S. Supreme Court reversed the conviction in that case for a violation of the defendant’s Fifth Amendment rights. This Court should do the same here.

B. ARGUMENT

1. MR. CHOQUETTE'S FIFTH AND FOURTEENTH AMENDMENT RIGHTS WERE VIOLATED BY THE ADMISSION OF STATEMENTS HE MADE AFTER UNEQUIVOCALLY REQUESTING AN ATTORNEY.

a. The trial court violated Mr. Choquette's Fifth Amendment rights by admitting statements Mr. Choquette made after he said "obviously I'm going to need an attorney". As explained in Mr. Choquette's opening brief, his conviction should be reversed because the trial court admitted statements he made after stating, "And obviously I'm going to need an attorney." The trial court's ruling violated Mr. Choquette's rights under the Fifth Amendment and Edwards, 451 U.S. at 481. Brief of Appellant at 9-18.

The State concedes that Mr. Choquette said, "obviously I'm going to need an attorney." Remarkably, though, the State argues this statement is not a request for counsel. The State postulates that Mr. Choquette meant he wanted an attorney but not until trial. Brief of Respondent at 23. The State does not cite any authority for the proposition that an unequivocal request for counsel may be ignored if the State can hypothesize an alternative connotation.

The State claims the request for an attorney must be viewed "in context," but this claim only weakens the State's position. Brief

of Respondent at 23. The surrounding context makes clear that the facially unequivocal request for counsel was, in fact, an unequivocal request for counsel. Mr. Choquette requested counsel at the same time he requested other things he needed immediately. Ex. 34 at 3-4. He asked for his multiple sclerosis medications. He asked that someone look after his dog. And he asked for an attorney. Ex. 34 at 3-4. If the State thinks the context shows Mr. Choquette did not want an attorney until trial, then the State must think Mr. Choquette did not really want anyone to take care of his dog until trial, and did not really want his MS medications until trial. This is an absurd interpretation of these statements. Mr. Choquette clearly requested immediate access to his medications and immediate care for his dog. Thus, looking at context – as the State argues we must – Mr. Choquette clearly requested immediate access to counsel.

The State relies upon Davis v. United States, 512 U.S. 452, 114 S. Ct. 2350, 129 L. Ed. 2d 362 (1994), and Mincey v. Head, 206 F.3d 1106, 1132 (11th Cir. 2000), for its claim that Mr. Choquette did not request counsel. Brief of Respondent at 26. However, these cases are distinguishable. In Mincey, the defendant told officers to “go ahead and run the lawyers.” 206 F.3d

at 1132. In Davis, the defendant said, “Maybe I should talk to a lawyer.” 512 U.S. at 452. When officers followed up by asking Davis whether he was requesting an attorney, he replied that he was not. Id.

In contrast, Mr. Choquette said, “obviously I’m going to need an attorney.” Ex. 34 at 4. While the words “maybe” and “should” are equivocal, the words “obviously” and “need” are not.

The State ignores Edwards when arguing that Mr. Choquette “consented to an interview with Elmore the next day despite knowing that he did not have to speak with the police and he could have an attorney present during the interrogation” and that Mr. Choquette “never demanded that an attorney be made available during the second interview.” Brief of Respondent at 27. If either of these things mattered, Edwards would have come out the other way.

In Edwards, as here, the defendant consented to an interview with law enforcement the day after requesting counsel, despite knowing that he did not have to speak with the police and he could have an attorney present during the interrogation. Edwards, 451 U.S. at 478. Also as here, the defendant in Edwards never demanded that an attorney be made available during the

second interview. Id. But the Supreme Court held that because officers improperly questioned Edwards after he requested counsel, “the use of Edwards’ confession against him at his trial violated his rights under the Fifth and Fourteenth Amendments.” Id. at 480. The same is true here. Under Edwards, Mr. Choquette’s conviction must be reversed.

b. The statement Mr. Choquette made to Officer Shannon right after confessing to Sergeant Elmore was also inadmissible. Not only were Mr. Choquette’s statements to Sergeant Elmore on September 26 inadmissible, but the statement he allegedly made immediately thereafter to Officer Shannon should have been suppressed as well. Officer Shannon testified that Mr. Choquette made the statement to him on September 26, as he took him back to his cell right after Sergeant Elmore coerced a confession. 9/29/10 RP 9-12.

The State agrees that the trial court’s finding that Mr. Choquette made the statement to Officer Shannon on September 25 is erroneous. Brief of Respondent at 16 n.12; CP 77-78, 80, 81. The State nevertheless argues that the admission of the statement did not violate Mr. Choquette’s Fifth Amendment rights. The State is incorrect.

The State makes much of the fact that Officer Shannon did not ask Mr. Choquette a question as he escorted him to his cell. Brief of Respondent at 19-23. But as explained in Mr. Choquette's opening brief, this statement was a product of Sergeant Elmore's unlawful interrogation; indeed, the statement makes no sense in isolation. The State argues that "Shannon did not participate in the interview between Elmore and Choquette." Brief of Respondent at 22. But Officer Shannon was sitting right next to the room in which Sergeant Elmore interviewed Mr. Choquette, and Officer Shannon heard parts of the interrogation. 9/29/10 RP 9-10. It is clear that Mr. Choquette knew Officer Shannon heard the conversation with Elmore, and that his statement was a continuation of that conversation. The problem is the conversation never should have occurred without counsel. Because Mr. Choquette was interrogated after he unequivocally requested an attorney, neither his confession to Sergeant Elmore nor his alleged follow-up statement to Officer Shannon was admissible.

The State faults Mr. Choquette for citing Missouri v. Seibert, 542 U.S. 600, 614, 124 S.Ct. 2601, 159 L.Ed.2d 643 (2004), arguing Seibert is "easily distinguished." Respondent's Brief at 22. But the citation to Seibert was appropriate. The State does not

acknowledge the “cf.” signal, which means “cited authority supports a proposition different from the main proposition but sufficiently analogous to lend support.” The Bluebook: A Uniform System of Citation 47 (Columbia Law Review Ass’n et al. eds., 18th ed. 2005). Mr. Choquette properly explained the relevance in parentheses following the citation. See id.; Brief of Appellant at 15.

The point is that the statement made to Officer Shannon was not an independent conversation, but was a remark made in response to Sergeant Elmore’s improper interrogation. All statements Mr. Choquette made on September 26 were inadmissible because Mr. Choquette clearly requested counsel on September 25 yet police continued to interrogate him until he confessed without making counsel available.

c. The statements Mr. Choquette made to Officer Hoagland the next day were also inadmissible, because counsel still had not been provided. “[I]t is inconsistent with Miranda and its progeny for the authorities, at their instance, to reinterrogate an accused in custody if he has clearly asserted his right to counsel.” Edwards, 451 U.S. at 485. Mr. Choquette clearly asserted his right to counsel the night of September 25, 2009, yet the authorities reinterrogated him on the 26th and again on the 27th. Just as the

statements Mr. Choquette made to Elmore and Shannon on the 26th should have been suppressed, the statements made to Officer Hoagland on the 27th should have been suppressed.¹

On September 27, 2009, Officer Hoagland contacted Mr. Choquette in the Forks jail to interrogate him “about the possible murder weapon.” 9/29/10 RP 17. Although Hoagland read Miranda warnings, he did not provide Mr. Choquette with an attorney. 9/29/10 RP 17-19. Mr. Choquette told Hoagland he threw a blue revolver off a bridge on Highway 101. 12/8/10 RP 60-61. Over Mr. Choquette’s objections, Officer Hoagland reiterated these statements at trial. 9/29/10 RP 91; 12/8/10 RP 60-61.

As with the admission of the statements made on September 26, 2009, the admission of the statements made on September 27, 2009 violated Mr. Choquette’s Fifth Amendment rights because Mr. Choquette had unequivocally requested counsel yet Officer Hoagland interrogated him without providing an attorney. Once an accused has requested counsel, “a valid waiver of that right cannot

¹ Mr. Choquette acknowledges that he did not discuss Officer Hoagland’s statements specifically in the opening brief; however, the issue was clearly preserved below. 9/29/10 RP 91. The statements made to Officer Hoagland were de minimis relative to the statements to Elmore and Shannon. Even if this Court does not address the statements to Hoagland, the State cannot prove beyond a reasonable doubt that the outcome would have been the same if the statements to Elmore and Shannon had been properly excluded.

be established by showing only that he responded to further police-initiated custodial interrogation, even if he has been advised of his rights.” Minnick v. Mississippi, 498 U.S. 146, 150, 111 S.Ct. 486, 112 L.Ed.2d 489 (1990) (citing Edwards, 451 U.S. at 484). All of the statements Mr. Choquette made to law enforcement on September 26 and 27, 2009 should have been suppressed because he unequivocally requested counsel on September 25, 2009 but none was provided.

d. The State cannot prove beyond a reasonable doubt the error did not contribute to the verdict obtained because apart from the confession, the State’s case was weak. The State acknowledges that it bears the burden of proving beyond a reasonable doubt that this constitutional error did not contribute to the verdict. Contrary to the State’s claim, it cannot come close to meeting that burden here.

“A confession is like no other evidence. Indeed, the defendant’s own confession is probably the most probative and damaging evidence that can be admitted against him.” Arizona v. Fulminante, 499 U.S. 279, 296, 111 S.Ct. 1246, 113 L.Ed.2d 302 (1991). Mr. Choquette’s coerced confession was the heart of the prosecution’s case; indeed it was the only direct evidence that he

committed the crime. The State admits that the remainder of the evidence was “circumstantial.” Brief of Respondent at 28-29.

The State mentions that a witness heard several shots fired and that the autopsy revealed the victim was shot at close range. Brief of Respondent at 29. But the question is not whether someone committed murder; the question is whether Mr. Choquette was the perpetrator. The State cannot prove beyond a reasonable doubt that the Fifth Amendment violation was harmless as to Mr. Choquette. None of the witnesses the State called saw Mr. Choquette commit the crime.² It was the erroneous admission of Mr. Choquette’s confession that secured the verdict against him.

The State claims that witnesses “observed Choquette’s Chevy Blazer speeding away from the crime scene,” but this is not accurate. Brief of Respondent at 29. Jose Louis Roland and Nikki Farron were in a car near the scene of the crime, but could not identify the perpetrators. 12/7/10 RP 27. Mr. Roland said the shooter drove a black Blazer while Ms. Farron said he drove a Camaro. 12/7/10 RP 16, 42, 49. Ms. Farron said the shooter’s

² Mr. Choquette objects to the following sentence on pages 1-2 of the Response Brief: “Etienne Choquette shot and killed Maldonado as he approached a dark footpath leading to White’s neighborhood.” The State cites 12/7/10 RP 67-72 for this proposition, but nowhere in those pages does the testifying officer state that Mr. Choquette committed this crime. Instead, he talks about where the murder was committed and the identity of the victim.

license plate included the number "827," but Mr. Choquette's license plate number is 91617. Ex. 39; 12/7/10 RP 28.

The State notes that Mr. Choquette loved Kellie White and was angry that Maldonado physically abused her. Brief of Respondent at 28. But Ms. White testified that unlike her brothers – who had explicitly threatened to kill the victim in retaliation for the beatings – Mr. Choquette "never insinuated he would do any harm. Basically he said he would be support if I needed him to help me, he would do whatever he could to help protect me from being harassed." 12/7/10 RP 95.

No fingerprints or DNA evidence connected Mr. Choquette to the crime. 12/8/10 RP 127. The forensic scientist could not match the bullets found in the victim's body to the alleged murder weapon. 12/8/10 RP 142.

In sum, the evidence apart from the coerced confession was weak. The State therefore cannot show that the improper admission of Mr. Choquette's statements was harmless beyond a reasonable doubt. Accordingly, the conviction should be reversed and the case remanded for a new trial. Chapman v. California, 386 U.S. 18, 24, 87 S. Ct. 824, 17 L. Ed. 2d 705 (1967).

2. THE TRIAL COURT ERRED IN INSTRUCTING THE JURY THAT THIS CASE WAS NOT A DEATH-PENALTY CASE.

The prosecutor asked the court to instruct the jury pretrial that “this is not a death penalty case.” 12/6/10 RP 7. The Supreme Court has repeatedly held that such instructions are improper. State v. Hicks, 163 Wn.2d 477, 487-88, 181 P.3d 831 (2008); State v. Mason, 160 Wn.2d 910, 930, 162 P.3d 396 (2007); State v. Townsend, 142 Wn.2d 838, 846-47, 15 P.3d 145 (2001). “The question of the sentence to be imposed by the court is never a proper issue for the jury’s deliberation, except in a capital case.” Townsend, 142 Wn.2d at 846 (quoting State v. Bowman, 57 Wn.2d 266, 271, 356 P.2d 999 (1960)).

The State argues that the trial court rejected the prosecutor’s request and “refused to inform the jury that the case did not involve capital punishment.” Brief of Respondent at 31. The State does not cite any part of the record in which the court rejected the State’s request or even indicated that it might reject it. When Mr. Choquette attempted to obtain transcripts for the court’s pre-trial instructions to the jury in September of 2011, he was informed that

the court reporter “never reports” this portion of proceedings.³

Appendix A. This is so despite the fact that a criminal defendant is constitutionally entitled to a record of sufficient completeness to permit effective appellate review of his or her claims. State v. Tilton, 149 Wn.2d 775, 781, 72 P.3d 735 (2003). This court reporter’s policy prevents any defendant from ever raising a Townsend claim.

Mr. Choquette raised the issue based on the available record. The available record shows the State asked the court to instruct the jury the case was not a capital case, and the court did not reject the request. The State must not be allowed to request such an instruction and then insulate the error from review by citing the absence of the record to which Mr. Choquette is entitled.

Because Mr. Choquette’s trial counsel could not remember one way or the other whether the trial court gave the State’s requested instruction, the record could not be reconstructed. See Tilton, 149 Wn.2d at 783 (reversing where trial counsel “had no notes and no independent recollection” of the missing portion of

³ Mr. Choquette’s appellate counsel then called trial counsel, who could not remember one way or the other whether the court instructed the jury that the case was not a capital case. Thus, reconstruction of the record was not possible. Nor should a defendant be required to reconstruct the record for pre-trial instructions in every case in order to determine whether a Townsend issue exists. The policy of not reporting pre-trial instructions must be changed.

proceedings). As in Tilton, the record that is available demonstrates likely error, but Mr. Choquette is prejudiced by the incomplete record because it is impossible to determine definitively whether the issue exists. See id. at 784-85. Mr. Choquette accordingly asks this Court to reverse either because the existing record demonstrates the error, or because the record to which Mr. Choquette is constitutionally entitled is insufficient to allow him to appeal the issue.

3. THE SENTENCING COURT ERRED IN IMPOSING 24-48 MONTHS OF COMMUNITY CUSTODY AND IN IMPOSING DISCRETIONARY COSTS AND FEES.

a. The sentencing court erred in imposing 24-48 months of community custody because the statute mandates a term of 36 months. The State agrees that the sentencing court improperly imposed a range of 24-48 months of community custody instead of a 36-month term as required by statute. Brief of Respondent at 33-34. This Court should accept the concession.

b. The sentencing court erred in imposing costs and fees because Mr. Choquette is indigent and lacks the ability to pay. In his opening brief, Mr. Choquette argued it was improper for the sentencing court to impose \$968.56 in discretionary costs and fees

given that Mr. Choquette lacks the present and future ability to pay. The State responds that Mr. Choquette's request for \$25,000 bail shows he is not indigent. Brief of Respondent at 33 ("If Choquette has access to \$25,000 then he should have little difficulty making meager payments toward his attorney fees, criminal filing fee, and sheriff costs"). This argument does not make sense because bail bond companies do not pay attorney fees, filing fees, and sheriff costs.

As explained in the opening brief, the record shows Mr. Choquette was indigent and was represented by court-appointed counsel. He was on the verge of serving a 300-month prison sentence. He had testified that although he used to earn a living as a fisherman, he was severely injured in a car accident and was living on SSI payments. 12/13/10 RP 16. Additionally, he suffers from multiple sclerosis. 12/13/10 RP 16. The court did not take Mr. Choquette's financial status into account at all, instead imposing the costs and fees "we typically impose." 2/3/11 RP 14. This was improper. State v. Curry, 118 Wn.2d 911, 915-16, 829 P.2d 166 (1992); RCW 10.01.160(3); Cf. State v. Grayson, 154 Wn.2d 333, 342, 111 P.3d 1183 (2005) (failure to make individualized determination of whether DOSA appropriate is abuse of discretion

because it is a failure to exercise discretion). Accordingly, Mr. Choquette asks this Court to strike the discretionary costs imposed.

C. CONCLUSION

For the reasons above and in the opening brief this Court should reverse Mr. Choquette's conviction and remand for a new trial.

DATED this 8th day of February, 2012.

Respectfully submitted,



Lila J. Silverstein – WSBA 38394
Washington Appellate Project
Attorney for Appellant

On the Brief:



Michael Callahan – APR 9 # 9116395

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

STATE OF WASHINGTON,)	
)	
Respondent,)	
)	
v.)	NO. 41769-3-II
)	
ETIENNE CHOQUETTE,)	
)	
Appellant.)	

DECLARATION OF DOCUMENT FILING AND SERVICE

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