

NO. 43032-1

**COURT OF APPEALS, DIVISION II
STATE OF WASHINGTON**

STATE OF WASHINGTON, RESPONDENT

v.

MICHAEL G. RICHEY, APPELLANT

Appeal from the Superior Court of Pierce County
The Honorable Frank Cuthbertson, Judge

No. 10-1-04919-5

BRIEF OF RESPONDENT

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

1. Did the State have sufficient evidence to convict the defendant of failure to register as a sex offender?
2. Should the defendant's sentence be remanded only to correct the community custody part of the sentence?

B. STATEMENT OF THE CASE.

1. Procedure

On November 18, 2010, the State charged Michael George Richey ("defendant") with failure to register as a sex offender. CP 1. On October 17, 2011, an amended information was filed correcting the incident date. CP 3.

Defendant waived his right to jury trial. CP 4; 1 RP 5. On December 12, 2011, bench trial commenced before the Honorable Frank E. Cuthbertson. 1 RP 1. The court found defendant guilty as charged. CP 23-39; 2 RP 221.

On February 3, 2012, defendant was sentenced to 43 months of confinement, the low end of the standard range, and 0-36 months of community custody. CP 23-39; 3 RP 8. Defendant filed a timely notice of appeal. CP 40.

2. Facts

In 1994, defendant was convicted of one count of child rape in the second degree in Washington State. CP 6-15 (Finding 4)¹. Defendant had an indefinite duty to register as a sex offender. CP 6-15 (Finding III).

On May 3, 2010, defendant had registered with the Pierce County Sheriff's Department Sex Offender Registration Unit and provided the address of 2011 217th Street Court East in Spanaway, WA as his registered address. CP 6-15 (Finding IIV). Defendant was aware of his ongoing duty to register as a sex offender. CP 6-15 (Finding V). The registration statutes informed the defendant of the requirement that he return to the Pierce County Sheriff's Department within three business days of changing residences to update his registration, or in the alternative, that if defendant ceased to have a fixed address that he return to the Pierce County Sheriff's Department to register as a transient sex offender. CP 6-15 (Finding V).

On May 7, 2010, the Pierce County Sheriff's Department Sergeant Trent Stephen and Deputy Hudson conducted a sex offender verification check at defendant's registered address. CP 6-15 (Finding X). The registered address was located in a trailer community. CP 6-15 (Finding

¹ An appellate court reviews only those findings to which error has been assigned; unchallenged findings of fact are verities upon appeal according to RAP 10.3(a)(3). *State v. Hill*, 123 Wn.2d 641, 644, 870 P.2d 313 (1994).

X). The officers came into contact with Hollie Moss and Christina Lawson, the residents of the trailer. CP 6-15 (Finding X); 1 RP 60; 1 RP 72. The officers were invited into the trailer, observed the living room, and were directed to defendant's bedroom in the trailer. CP 6-15 (Finding XI). The officers both entered the bedroom area of the trailer. 1 RP 61. Both officers observed a mattress leaned up against the wall, and a few boxes stacked in the corner. CP 6-15 (Finding XII). The officers did not observe any bedding or personal effects. CP 6-15 (Finding XII). Both officers testified that it did not appear that anyone had been living inside of the room. 1 RP 61; 1 RP 72. Neither officer observed standing water or signs of flooding in the bedroom or trailer. CP 6-15 (Finding XII). Four to six weeks later, the officers returned to the trailer to see if Mr. Richey was there, but no one was home. 1 RP 74.

The officers classified defendant as having absconded. (Finding XIII).

Defendant had several witnesses testify on his behalf.

Harold Lindren, defendant's brother, testified that he did not know when defendant moved to 2011 217th Street Court East in Spanaway, Washington. CP 6-15 (Finding XXI).

Patrick Sorenson, a close friend of the defendant's, did not know when defendant had moved in or out of the registered address. CP 6-15 (Finding XXV). Mr. Sorenson stated that he never had a meal with the

defendant at the trailer, but had eaten there with Hollie and Christy. 1 RP 120.

Benjamin Workman, a friend of defendant, testified to visiting defendant at the registered address and assisting defendant with moving defendant's possessions from the trailer to a storage shed on May 6, 2010, as a result of the flooding in defendant's bedroom. CP 6-15 (Finding XXIII).

Hollie Moss resided at 2011 217th Street Court East in Spanaway, Washington during the period of May 7, 2010 through July 29, 2010. CP 6-15 (Finding XXVIII). Ms. Moss suffered physical disabilities and various medical conditions, so Ms. Moss spent most of her time seated on the couch located in the living room of the trailer. CP 6-15 (Finding XXVIII). Ms. Moss testified defendant stayed at her house maybe four nights a week. 2 RP 148.

Defendant testified that his days were hectic as he had to attend drug and alcohol rehabilitation, which was a two and a half hour trip each way by bus. 2 RP 175. Defendant testified that when he was living at Ms. Moss's, he was not sleeping at her house every night. 2 RP 192. Defendant testified that he would sometimes stay at his mom's house, and sometimes at Tom Jones's house. 2 RP 178.

C. ARGUMENT.

1. THE STATE HAD SUFFICIENT EVIDENCE TO CONVICT DEFENDANT OF FAILURE TO REGISTER AS A SEX OFFENDER.

Due process requires that the State bear the burden of proving each and every element of the crime charged beyond a reasonable doubt. *State v. Thomas*, 166 Wn.2d 380, 390, 208 P.3d 1107 (2009). The applicable standard of review is whether, after viewing the evidence in the light most favorable to the prosecution, any rational fact finder could have found the elements of the crime beyond a reasonable doubt. *State v. Marohl*, 170 Wn.2d 691, 698, 246 P.3d 177 (2010). Challenging the sufficiency of the evidence admits the truth of the State's evidence and all reasonable inferences from the evidence. *State v. Gerber*, 28 Wn. App. 214, 217, 622 P.2d 888 (1981), *State v. Theroff*, 25 Wn. App. 590, 593, 608 P.2d 1254 (1980). All reasonable inferences from the evidence must favor the State and must be interpreted most strongly against the defendant. *State v. Salinas*, 119 Wn.2d 192, 201, 829 P.2d 1068 (1992).

Both circumstantial and direct evidence are equally reliable. *State v. Lubers*, 81 Wn. App. 614, 619, 915 P.2d 1157 (1996). In the case of conflicting evidence or evidence where reasonable minds might differ, the jury is the one to weigh the evidence, determine credibility of witnesses and decide disputed questions of fact. *Theroff, supra*, at 593. Credibility

determinations are for the trier of fact and not subject to review. *State v. Camarillo*, 115 Wn.2d 60, 71, 794 P.2d 850 (1990).

- a. There was substantial evidence to convict the defendant of the crime of failure to register as a sex offender.

Defendant challenges the sufficiency of the court's finding that defendant was transient and obligated to notify the sheriff's department of this change in status. Brief of Appellant 7.

RCW 9A.44.130 requires that the person registering shall provide certain information, including their name and complete residential address. RCW 9A.44.130(3)(a). If the person lacks a fixed residence, then they must report weekly in the county they are registered, and may have to list all the places that they stayed during the last seven days. RCW 9A.44.130(6)(a).

There is more than sufficient evidence to prove beyond a reasonable doubt that defendant failed to comply with the notification requirements regarding change of address.

Any person who lacks a fixed residence must report weekly, in person, to the sheriff of the county where he or she is registered.

RCW 9A.44.130(5)(b).

Defendant knowingly failed to comply with residing at his registered address. It appeared that no one had been living in the bedroom

at the registered address. Defendant's mattress was leaned up against the wall and there was no bedding. CP 6-15 (Finding XII). Defendant admitted to frequently sleeping at his mom's house, and Tom Jones' house to attend various appointments throughout the day. 2 RP 177-178. Ms. Moss, who lived at the trailer and was always there due to health issues, testified that defendant only stayed at her residence maybe four times a week. 2 RP 159. The evidence supports the finding that defendant was not residing at his registered address and had failed to comply with the registration requirements.

Even a temporary residence can trigger the registration requirement. *See State v. Pray*, 96 Wn. App. 25, 29-30, 980 P.2d 240 (1999). If it can be shown that the defendant established a residence, even on a temporary basis, then the defendant is required to register at the new, temporary address. *Id.* The terms "residence" and "residence address" refer to a place that has permanence and an intent to return to the place. *State v. Pickett*, 95 Wn. App. 475, 479, 975 P.2d 584 (1999).

In the instant case, defendant was registered at Ms. Moss's home, but admits to sleeping at his mom's and Tom Jones' residence on a regular basis. 2 RP 178. Defendant even testified that he was also registered at his mom's and Tom Jones' house, however, the statute does not allow for people to be registered at two permanent addresses. 2 RP 178. One

cannot have multiple “permanent addresses” because the word permanent means that there is an intent to return to a place, as distinguished from “temporary sojourn or transient visit.” *See State v. Pickett*, 95 Wn. App, at 479. If defendant does not have a permanent address, then there is a provision to register as a transient. So even if this was a temporary move, he still needed to register his temporary address. Defendant failed to comply with the registration requirements and, therefore, failed to register as a sex offender.

The defendant’s argument that the State failed to prove the defendant’s residential status is misplaced because residential status is not an element of the crime. *See State v. Peterson*, 168 Wn.2d 763, 772, 230 P.3d 588 (2010). Sex offender registration serves the important community interest of having law enforcement know the presence and location of sex offenders in the community. *See State v. Ward*, 123 Wn.2d 488, 500–11, 869 P.2d 1062 (1994); *see also State v. Stratton*, 130 Wn. App.760, 765, 124 P.3d 660 (2005) (holding that defendant still resided at his fixed residence because law enforcement could contact the defendant on any particular night at his fixed address, albeit in his car in the driveway). Here, there was no sign that defendant lived at the residence, and at most, defendant was around maybe four times a week. Law enforcement had no way of contacting defendant or even finding him

by his registered address. Defendant's argument that the trailer was his fixed residence because his mail was sent there and a few boxes were kept over there, would mean that a sex offender could make a post office box, or a storage unit, a fixed residence for registration purposes, which would defeat the purpose of sex offender registration altogether. Defendant's random appearance to pick up mail, or sleep over, does not meet the criteria of "abiding or dwelling in a place" and does not provide law enforcement with knowledge of his presence or location within the community.

In addition, this case is distinguishable from *State v. Stratton* where the defendant defaulted on his home purchase, but continued sleeping in the driveway of his registered address, received mail and telephone service, returned to the address daily, and had no definite departure date. *Stratton*, 130 Wn. App at 762-763. The Court of Appeals reversed defendant's conviction for failure to register as a sex offender because it was the "place" the defendant was abiding or dwelling and was not subject to change or fluctuation. *Id.* at 766-767.

In this case, the defendant was not sleeping at his registered address. The mattress was leaned up against the wall, and there were no personal belongings of the defendant's at the trailer. CP 6-15 (Finding XII). In addition, Ms. Moss testified that she only saw the defendant

maybe four days out of the week. 2 RP 148. Defendant's friends could not even testify to when defendant moved into the trailer. In addition, the defendant admitted to not residing at the registered address because it was inconvenient to get to the meetings and treatments, so he would stay with his mother or friends. This case is significantly different from *Stratton* because the "place" the defendant was living at was subject to change and fluctuation.

The State proved beyond a reasonable doubt that defendant failed to comply with the registration requirements.

- b. There was substantial evidence to support the trial court's findings of fact XXII and XXIX.

An appellate court reviews only those findings to which error has been assigned; unchallenged findings of fact are verities upon appeal. *State v. Hill*, 123 Wn.2d 641, 644, 870 P.2d 313 (1994). As to challenged factual findings, the court reviews the record to see if there is substantial evidence to support the challenged facts; if there is, then those findings are also binding upon the appellate court. *Hill*, 123 Wn.2d at 644. Substantial evidence exists when there is a sufficient quantity of evidence to persuade a fair-minded, rational person of the truth of the finding. *Hill*, at 644. Credibility determinations are for the trier of fact and are not

subject to appellate review. *State v. Camarillo*, 115 Wn.2d 60, 71, 794 P.2d 850 (1990).

A finding of fact that is erroneously denominated as a conclusion of law will be treated as a finding of fact. *Rickert v. Pub. Disclosure Comm'n*, 161 Wn.2d 843, 847, 168 P.3d 826 (2007) (citing *State v. Luther*, 157 Wn.2d 63, 78, 134 P.3d 205 (2006)). See, *Hoke v. Stevens-Norton, Inc*, 60 Wn.2d 775, 778, 375 P.2d 743 (1962); See also, *Neil F. Lampson Equip. Rental & Sales, Inc v. West Pasco Water Sys., Inc.*, 68 Wn.2d 172, 174, 412 P.2d 106 (1966) (stating that where conclusions of law are incorrectly denominated as findings of fact, the court still treats them as conclusions of law).

The court reviews conclusions of law *de novo*. *State v. Smith*, 154 Wn. App. 695, 699, 226 P.3d 195 (2010) (citing *State v. O'Neill*, 148 Wn.2d 564, 571, 62 P.3d 489 (2003); *State v. Eisfeldt*, 163 Wn.2d 628, 634, 185 P.3d 580 (2008)).

The defendant argues that there is not substantial evidence to support Findings of Fact XXXII, or XXIX. Appellant's Brief at 8.

In finding XXXII the trial court found:

That during the period of May 7, 2010 through July 29, 2010 defendant attended numerous addiction treatment meetings and appointments on a daily basis throughout

Pierce County. That defendant would take a bus from Spanaway to his various addiction treatment appointments which resulted in two and a half hour trip each way. That defendant stayed at his mother's residence, Tom's house, and other unknown locations during the period of May 7, 2010 through July 29, 2010, in order to avoid making the lengthy trip to his appointments from 2011 217th Street Court East in Spanaway, Washington. That defendant did know where he would stay from one night to the next.

CP 6-15 (Finding XXXIII).

Substantial evidence supports the finding. Defendant admitted to not staying at his registered address every night. 2 RP 178. Defendant testified that he would stay frequently at his Mom's house, and Tom Jones' house because it was more convenient for him to attend drug and alcohol rehabilitation. 2 RP 175-178. Defendant stated that it was inconvenient to stay at his registered address because he had to take a two and a half hour bus ride to get to the meetings. 2 RP 175.

The defendant has misread the finding. Defendant quoted the finding to state that defendant "never testified that he '**did not know** where he would stay from one night to the next...'" *See* Brief of Appellant at 8. However, the finding actually states that defendant "**did know** where he would stay from one night to the next." The record establishes that there was sufficient evidence that defendant stayed with his mom, or Tom Jones in order to avoid making lengthy trips. Defendant resided at at least 3 different residences. Because all facts and inferences

are drawn in favor of the court's finding, this substantial evidence supports the court's finding XXXII.

In finding XXIX the trial court found:

That defendant did not take meals at the trailer. That defendant stayed at the trailer maybe four nights per week. That Hollie received the amount of \$100 from defendant on an unknown date. That Hollie did not know when defendant was present at the trailer.

CP 6-15 (finding XXIX).

Substantial evidence supports the finding. It can be inferred from the record that defendant did not take meals at the trailer because nothing in the record, besides defendant's brother's testimony of eating a spaghetti dinner one time, states that defendant took meals at the trailer. In addition, both of defendant's good friends, Mr. Workman, and Mr. Sorenson, never ate a meal with defendant at the trailer. 1 RP 98; 1 RP 120. Ms. Moss, who lived at the trailer also said that defendant did not necessarily take meals at the trailer. CP 6-15 (Finding XXVIII); 2 RP 148. The defendant only stayed at the trailer maybe four times a week. 2 RP 148. Ms. Moss testified that she received rent money from defendant on an unknown date². 2 RP 152. Ms. Moss also testified that she was not aware of all the times that defendant was present in the trailer. 2 RP 165.

The record establishes that there was sufficient evidence that defendant did not take meals at the trailer. Because all facts and inferences are drawn in favor of the court's finding, this substantial evidence supports the court's finding XXIX.

² The finding conflicts with the transcript only in terms of the amount that Ms. Moss received. Ms. Moss testified that she actually received \$100 from defendant's mother, and \$200 from defendant for rent. 2 RP 163-164.

3. THE DEFENDANT’S SENTENCE SHOULD BE
REMANDED ONLY TO CORRECT THE
COMMUNITY CUSTODY PART OF HIS SENTENCE.

Under RCW 9.94A.701(9), first enacted in 2009, the community custody term specified by RCW 9.94A.701 “shall be reduced by the court whenever an offender’s standard range term of community custody exceeds the statutory maximum or the crime.” *State v. Boyd*, 174 Wn.2d 470, 472, 275 P.3d 321, 322 (2012). Questions of statutory interpretation are questions of law subject to *de novo* review. *State v. Franklin*, 172 Wn.2d 831, 835, 263 P.3d 585 (2011).

In *Boyd*, defendant was sentenced after RCW 9.94A.701(9) became effective on July 26, 2009. 174 Wn.2d at 473. Defendant was convicted of violating a protection order and was sentenced to terms of confinement and community custody that together exceeded the 60-month term statutory maximum for the offense. *Id.* at 471. The trial court included a notation on the judgment and sentence stating that the total term of confinement and community custody could not exceed the statutory maximum. *Id.* at 472. The Court held that following the enactment of the statute, the “*Brooks*³ notation” procedure no longer complied with statutory requirements. *Boyd*, 174 Wn.2d at 472. The trial

³ *In re Personal Restraint of Brooks*, 166 Wn.2d 664, 211 P.3d 1023 (2009).

court was required to reduce Boyd's term of community custody to avoid a sentence in excess of the statutory maximum. *Id.* Therefore, the remedy was to remand to the trial court to either amend the community custody term or resentence defendant on the protection order violation conviction consistent with RCW 9.94A.701(9). *Id.* at 323.

In *Franklin*, the Court held that the statute explicitly addressed the manner in which retroactivity operates for defendants who were sentenced before the amendments took effect, and the legislature charged the DOC, not sentencing court, with bringing preamendment sentences to compliance. 172 Wn.2d at 840. The Court stated that RCW 9.94A.701(1)-(3) requires community custody to be calculated with fixed terms. *Id.* at 836.

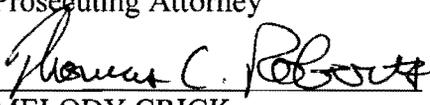
The State concedes that defendant was potentially sentenced past the statutory maximum of 60 months because defendant was sentenced to 43 months, and 0-36 months of community custody. 3 RP 8. Therefore, the remedy for this is to remand to the trial court to either amend the community custody term or resentence the defendant to a term consistent with RCW 9.94A.701(9).

D. CONCLUSION.

The State respectfully requests the Court to affirm defendant's convictions, and remand to either amend the community custody term or resentence the defendant to a term consistent with RCW 9.94A.701(9).

DATED: September 17, 2012.

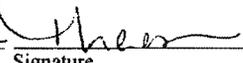
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Certificate of Service:

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

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PIERCE COUNTY PROSECUTOR

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