

FILED

OCT 18 2010

COURT OF APPEALS
DIVISION III
STATE OF WASHINGTON
By _____

NO. 28904-4-III

**COURT OF APPEALS, DIVISION III
OF THE STATE OF WASHINGTON**

**STATE OF WASHINGTON,
RESPONDENT,**

v.

**GABRIEL MIGUEL TOSCANO,
APPELLANT.**

RESPONDENT'S BRIEF

**D. ANGUS LEE
PROSECUTING ATTORNEY**

**By: Carole L. Highland
WSBA #20504
Deputy Prosecuting Attorney
By: Kevin J. McCrae
WSBA APR 9 #9111011
Attorneys for Respondent**

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I. IDENTITY OF RESPONDENT

The State of Washington, represented by the Grant County Prosecutor, is the Respondent herein.

II. RELIEF REQUESTED

The State asserts no error worthy of reversal occurred in the trial and conviction of the Appellant. The trial court should be affirmed.

III. ISSUES

- A. Whether there was sufficient evidence supporting Toscano's conviction on two counts of unlawful possession of a firearm in the first degree.
- B. Whether the court erred by not striking evidence of gang affiliation or issuing a limiting instruction.
- C. Whether the court erred by not striking evidence of "buy money" in conjunction with the search warrant.
- D. Whether the errors, if any, were cumulative and together warranted reversal.

IV. STATEMENT OF THE CASE

On November 6, 2009, officers of the Interagency Narcotics Enforcement Team (INET) executed a search warrant at 800 County Road, Apartment 17, in Warden, WA. RP 53:14-54:18. There they found three weapons; a pistol, found in the room where Gabriel Toscano was staying; a shotgun, found in the trunk of the car Toscano had rented; and a rifle, found in the master bedroom. INET Officers arrested Toscano as a felon in possession of a firearm, as well as on drug charges unrelated to this appeal. He was charged and convicted on two counts of unlawful possession of a firearm in the first degree, as well as one count of misdemeanor marijuana possession.

1. The pistol

Detective Alan Barrowman was detailed to assist in the search of the residence. RP 192:16-18. In the south bedroom of the home he found a .38 caliber revolver located between the mattress and the box spring, with three live rounds in the cylinder. RP 194:12-18. The revolver was wrapped in a blue bandana. RP197:20. Also located in the south bedroom were a suspension notice from the department of licensing to Toscano, RP 199:2-4, a plugged in, charging cell phone with texts to someone named Gabriel or Gabe, RP 282:9-13 and shoes that belonged to, or at least fit,

Gabriel Toscano, RP 273:15-274:20. Toscano also provided his girlfriend's address as an alternate address on his car rental agreement. RP 177:18-23. In addition Toscano admitted that he was staying in the south bedroom where the revolver was found. RP 333:14-15. Toscano stayed there with his girlfriend, Knorra Cano, about once a week for a couple of days at a time. RP 298:17-18. Knorra¹ denied owning the revolver. RP 238:19-24. An ownership check on the pistol revealed that no one present at the residence owned it or registered it to that address. RP 222:10-22.

Lucy Cano, Knorra's mother, claimed the pistol was hers. RP 285:18-20. She told the jury a story of receiving the gun from a friend of a friend, whose name she did not know, of being scared of it and wrapping in a blue bandana she happened to have in her hair, and hiding it in her 19 year old daughter's room underneath the mattress, without telling anyone it was there. She also refused to tell the court the name of the friend who introduced her to the original owner of the gun. RP 288:3-290:14. Lucy also kept a rifle in her room that was not seized, nor was Toscano charged with its possession. RP 290:20-25.

The revolver was wrapped in a blue bandana when it was found. Blue is the color of the Sureno Street Gang. The trial court judge, in

¹ Knorra Cano, Oscar Cano and Lucy Cano are referred to by their first names for clarity.

balancing the requirements to admit relevant evidence to show ownership with the need to avoid undue prejudice, instructed the witness to talk about a group that would be associated with the bandana. Sgt. Coats, a corrections officer with Grant County, testified that the blue bandana had significance to a group that Toscano had self identified with. He also slipped up and called the group a gang, then quickly corrected himself. The defense put forward no objection at the time. RP269:25-270:16. When given the chance to offer a limiting instruction to the jury after closing arguments, the defense attorney stated “there wasn’t any testimony about gang association.” RP 339:24-25.

2. The Shotgun

A shotgun, wrapped in a jacket, was found in the trunk of the rental car that Toscano had rented. The rental agreement with Toscano’s name and address on it was found in the glove compartment. RP159:20-25. There was only one set of keys provided for the rental car Toscano possessed, giving him sole control of who could access the car. RP 185:6-7.

V. ARGUMENT

A. THERE WAS SUFFICIENT EVIDENCE PRESENTED AT TRIAL SUPPORTING THE JURY'S UNANIMOUS VERDICT FINDING MR. TOSCANO GUILTY OF TWO COUNTS OF UNLAWFUL POSSESSION OF A FIREARM.

Toscano challenges his convictions for Unlawful Possession of a Firearm in the First Degree, arguing the evidence was insufficient to prove beyond a reasonable doubt that he committed the crime. Pet'r's Brief at 2.

In order to determine whether there was sufficient evidence to support Toscano's conviction, this Court will "view the evidence in the light most favorable to the prosecution and determine whether any rational fact finder could have found the essential elements of the crime beyond a reasonable doubt. *State v. Mitchell*, 169 Wn.2d 437, 443-44, 237 P.3d 282 (2010) (citing *State v. Engel*, 166 Wn.2d 572, 576, 210 P.3d 1007 (2009) (citing *State v. Wentz*, 149 Wn.2d 342, 347, 68 P.3d 282 (2003))). A claim of insufficiency of the evidence not only requires that the Appellant admit the truth of the State's evidence, but also grants the State the benefit of all inferences that can be reasonably be drawn from it. *State v. DeVries*, 149 Wn.2d 842, 849, 72 P.3d 748 (2003) (citing *State v. Green*, 94 Wn.2d 216, 222, 616 P.2d 628 (1980)). Additionally, appellate courts defer to the finder of fact (in this case, the jury) on issues of witness credibility. *State*

v. *Drum*, 168 Wn.2d 23, 35, 225 P.3d 237 (2010) (citing *State v. Camarillo*, 115 Wn.2d 60, 71, 794 P.2d 850 (1990)).

1. ***Unlawful Possession of a Firearm***

In order to prove the defendant committed the crime of Unlawful Possession of a Firearm the state must prove (1) the defendant had, in his control, possession or ownership, a firearm; and (2) that the defendant had been previously convicted of a serious offense. RCW 9.41.040. Toscano stipulated to being previously convicted of a serious offense under the statute. RP 4:15-6:18, 30:16-31:7, 49:5-51:3. Thus the issue in this appeal is whether Toscano had possession, control or ownership of a firearm.

Possession of a firearm may be either actual or constructive. The court used WPIC 133.52 without objection to define possession, specifically

Possession means having a firearm in one's custody or control. It may be either actual or constructive. Actual possession occurs when the item is in the actual physical custody of the person charged with possession. Constructive possession occurs when there is no actual physical possession but there is dominion and control over the item.

Proximity alone without proof of dominion and control is insufficient to establish constructive possession. Dominion and control need not be exclusive to support a finding of constructive possession.

In deciding whether the defendant had dominion and control over an item, you are to consider all the

relevant circumstances in the case. Factors that you may consider, among others, include whether the defendant had the immediate ability to take actual possession of the item, whether the defendant had the capacity to exclude others from possession of the item, and whether the defendant had dominion and control over the premises where the item was located. No single one of these factors necessarily controls your decision.

see RP 347:7-348:4. The facts in this case easily lead a rational jury to conclude that Toscano had possession of both the revolver and the shotgun under the totality of the circumstances test.

2. .38 Pistol

Applying the factors listed in the jury instruction, it is easy to see how a rational jury could convict Toscano. The revolver was tucked between the mattress and the box spring of bed he was sleeping on. It was wrapped in a blue bandana, a symbol of the group he was affiliated with. His girlfriend, with whom he shared the room, denied it was hers. The alternative way the pistol came to be under the mattress offered by the defense defied credibility. The appellant devotes a fair amount of space to the dominion and control of the premises factor. While Toscano did not have legal dominion and control, i.e. he didn't pay rent or a mortgage, he lived there on a regular basis with his girlfriend, kept his mail there, was staying overnight on a regular basis, and had clothing and shoes in the closet. He certainly had enough dominion and control to place a firearm

under his mattress, where it would be readily accessible to him if he wanted it. It would be difficult for a jury to rationally conclude the pistol was not Toscano's.

A review of similar cases reveals that there is ample evidence to convict Toscano. In *State v. Turner* 103 Wn. App. 515, 13 P.3d 234 (2000) a jury found the defendant had possession of a firearm when he was driving the truck the gun was in, knew it was there, and could reduce it to his possession. In *State v. Echeverria*, 85 Wn. App. 777, 934 P.2d 1214 (1997), an officer found a gun in plain site poking out from underneath the seat of the borrowed car the defendant was driving. The juvenile defendant denied knowing the gun was there. The court found the fact that the gun was in plain sight was sufficient for the fact finder to conclude there was knowledge of, and therefore possession of, the gun. This case is similar. The revolver was found under Toscano's mattress. There was evidence that could lead a reasonable juror to believe he knew it was there, specifically it was found with a blue bandana that was representative of the group Toscano belonged to. Finally, the alternate explanation offered of how the gun got there was simply not believable.

3. Shotgun

A rational jury also could have convicted Toscano of possessing the shotgun in the trunk of the car. In this instance there is sufficient

evidence of dominion and control. The car is effectively the ‘premises’ where the shotgun was found. Toscano had the only keys to the car, and was the renter of the car, effectively the owner for the purposes of this case. “When the sufficiency of the evidence is challenged on the basis that the State has shown dominion and control only over premises, and not over drugs, courts correctly say that the evidence is sufficient because dominion and control over premises raises a rebuttable inference of dominion and control over the drugs.²” *State v. Cantabrana*, 83 Wn. App. 204, 208, 921 P.2d 572 (1996), accord *State v. Olivarez*, 63 Wn. App. 484, 486, 820 P.2d 66 (1991). Toscano simply did not introduce enough evidence to refute this presumption in the eyes of the jury.

Toscano had exclusive control over the car at the time he was arrested. He was in possession of the only set of keys. He rented the car for his use. There is no requirement that the gun be immediately accessible. *State v. Howell*, 119 Wn. App. 644, 650, 79 P.3d 451 (2003). In *State v. Neff*, 163 Wn.2d 453, 181 P.3d 819 (2008) the Supreme Court found there was sufficient evidence for a firearms enhancement where the defendant had keys to a garage where guns were kept. This was adequate to prove the guns were “readily available for an offensive or defensive

² The statutes and pattern jury instructions defining possession for both drugs and weapons are nearly identical, and both the courts and the appellant use precedents from both types of cases interchangeably. *See, e.g.* WPIC 53.03; 133.52;

purpose”. *Id.* at 464. In *State v. Bradford*, 60 Wn. App. 857, 808 P.2d 174 (1991) there was sufficient dominion and control to find the defendant guilty when he was found in a house where he received his mail, and was the sole adult there when drugs were found. There was sufficient dominion and control over the car for a rational jury to conclude Toscano had dominion and control of the items inside of it.

If a person has formal dominion and control over the premises where a gun is found, (i.e. rents or owns it) this raises a rebuttable presumption that the person has dominion and control over the items in/on that premises. However, the reverse is not true. If one does not have formal dominion and control over the premises, no presumption is raised, and the state may prove its case by other relevant factors. Thus Toscano did not have formal dominion and control over the house, and the state proved he possessed the pistol by other means, specifically it was under the bed where he was sleeping, wrapped in a bandana representing the group he belonged to and did not belong to the girlfriend whom he was sharing the room with. Toscano did have formal dominion and control over the car, and was in possession of the only set of keys. His evidence that other people went into the car was simply insufficient to rebut the presumption that the gun was his.

B. THE ISSUE OF EVIDENCE THAT TOSCANO BELONGED TO A 'GANG' WAS NOT PRESERVED FOR REVIEW, AND THE EVIDENCE ADMITTED WAS WITHIN THE TRIAL COURT'S DISCRETION.

1. The issue of gang affiliation and Sgt. Coat's slip of the tongue was not preserved for review.

"The appellate court may refuse to review any claim of error which was not raised in the trial court." RAP 2.5.³ "The rules set forth...contemplate that a *timely* objection be made to the reception of the evidence." *State v. Baxter*, 68 Wn.2d 416, 422, 413 P.2d 638 (1966) (Emphasis in original). The point of this rule is to give the trial court the opportunity to address any concerns, so as to provide an opportunity to avoid the need for a new trial. *State v. Scott*, 110 Wn.2d 682, 685, 757 P.2d 492 (1988). Here the defense failed to make a timely objection and give the trial court opportunity to correct the error, the appellate court should not review the issue.

The defense counsel did object to the introduction of the bandana during the offer of proof provided by the prosecution, and excepted to the trial court's ruling on the issue. RP255:17-262:12. The trial court struck a compromise, stating that Sgt. Coats could testify that the blue bandana was associated with a group Toscano was associated with. Coats slipped

³ The RAP contains three exceptions not relevant here.

up and stated it was a gang, before correcting himself with the word group. RP 270:15-16. The defense never objected to the use of the word gang. In addition at the close of testimony the defense asked if the court would revisit the issue of a limiting instruction. The court asked the defense to propose one, to which the defense replied “Oh, wait a second, there wasn’t any testimony about gang association.” RP 339:21-25. Thus any appeal based on Coat’s slip of the tongue, or the failure to provide a limiting instruction, is waived, and the court should not review it. The only issue properly preserved for appeal is the propriety of admitting the blue bandana and its group association.

If the court does choose to review this issue, it should still reject the claim because any prejudice caused was de minimus. The blue bandana, combined with the fact that Toscano was known to belong to a group that uses that an identifying mark, along with the other evidence, was sufficient to implicate him with possession of the pistol. At any rate, as the appellant noted, the court’s actions to minimize the prejudice probably fooled no one as to Toscano’s true affiliation, thus any prejudice caused by Coat’s slip was harmless.

2. The Evidence Admitted was Within the Trial Court’s Discretion.

Washington courts have recognized the need for a connection between evidence of gang affiliation and the crime charged before admitting evidence of gang membership. *State v. Johnson*, 124 Wn.2d 57, 67, 873 P.2d 514 (1994). Evidence of gang affiliation is considered prejudicial. *State v. Asaeli*, 150 Wn. App. 543, 574-78, 208 P.3d 1136 (2009). Admission of such evidence is measured under the standards of ER 404(b). *State v. Boot*, 89 Wn. App. 780, 788-90, 950 P.2d 964 (1998); *State v. Yarbrough*, 151 Wn. App. 66, 210 P.3d 1029 (2009). Evidence of other bad acts can be admitted under ER 404(b) when a trial court identifies a significant reason for admitting the evidence and determines that the relevance of the evidence outweighs any prejudicial impact. *State v. Lane*, 125 Wn.2d 825, 831, 889 P.2d 929 (1995). The balancing of these interests must be conducted on the record. *Id.* at 832. The decision to admit or deny admission of ER 404(b) evidence is reviewed for abuse of discretion. *Id.* at 831. Discretion is abused when it is exercised on untenable grounds or for untenable reasons. *State ex rel. Carroll v. Junker*, 79 Wn.2d 12, 26, 482 P.2d 775 (1971).

“In applying ER 404(b), a trial court must engage in a three step analysis: determine the purpose for which the evidence is offered; determine the relevance of the evidence, i.e., whether the purpose for which the evidence is offered is of consequence to the outcome of the

action and tends to make the existence of an identified fact more probable; and lastly, balance on the record the probative value of the evidence against its prejudicial effect.” *State v. Campbell*, 78 Wn. App. 813, 821, 901 P.2d 1050 (1995). The nexus between the crime charged and the gang affiliation in this case is obvious, it goes to ownership of the pistol found wrapped in a blue bandana under the bed. The court conducted a balancing test of the interests on the record, specifically RP 258:5-262:3. At the beginning of the trial the defense raised a motion in limine about the gang testimony. RP9:8-12:7. The trial court judge restricted testimony until Coats could be questioned on his qualifications and experience. *Id.* The court specifically noted that the bandana was not being introduced to show propensity to act. RP260:10-16. It was introduced to show ownership. In addition the court balanced any undue prejudice and the probative value of the bandana by restricted the language to be used, in an attempt to minimize prejudice, by ordering the reference to be to a group, not a gang, and that the testimony allowed was the minimum necessary to prove ownership. This action minimized the emotional impact of calling Toscano a gang member, while still admitting relevant evidence. The fact that this was not likely to fool the jury is irrelevant. The trial judge, on the record, took reasonable action to minimize undue prejudice while still

allowing the state to make its case. Whether or not this would fool the jury is not a test the court is expected to meet.

Campbell is instructive. The defendant in that case was on trial for a gang motivated killing. The trial court properly balanced the prejudice brought on by gang association, but still admitted evidence necessary to prove the motive in the case. Gang affiliation is admissible, as long as it is not simply admitted to show propensity for bad acts. The trial court did not error in this result.

C. MENTION OF POLICE BUY MONEY WAS INVITED ERROR, UNOBJECTED TO AND HARMLESS.

The appellant claims that Detective Hallatt's brief mention of police buy money was prejudicial and merits a new trial. The statements in question occur at RP 228:7-229:6. Hallatt made these statements to describe documents handed to him by the defense attorney. She then asked if he recognized them. Hallatt then responded that they were two search warrants and an affidavit. He was then cut off, and the trial court judge asked him to finish what he was describing. This is where Hallatt first mentioned the buy money, in response to the court's direct question. The defense attorney stated an objection, saying she didn't ask about the buy money, but it was in the papers she had handed Hallatt, attached to the

search warrant. The court admonished the witness to stick to what was in the papers, to which the witness replied that he was doing just that.

The defense attorney never clarified for the court the basis for her objection, nor did she request a limiting instruction, but simply moved on, leaving the court to conclude it had addressed the issue. In order to give the court a chance to correct any errors in the proceeding, the objecting party must give the court a clear objection, a quick read through the record shows anything but.

The statement by the detective was also invited error. “In determining whether the invited error doctrine was applicable, courts have also considered whether a defendant affirmatively assented to the error, materially contributed to it, or benefited from it.” *State v. Momah*, 167 Wn.2d 140, 154, 217 P.3d 321 (2009). Here the defense attorney gave the detective the papers, including the buy money documentation, and asked him what they were, without any limiting guidance. She got the response she asked for.

Finally the appellant contends this was unduly prejudicial because it indicated Toscano was a drug dealer. At most this was redundant evidence. The jury knew that Toscano was arrested during a raid conducted at 1:00 AM by a large group of officers in a tactical formation who ended up using a battering ram on the door. In a reasonable person’s

experience the police do not conduct this kind of action unless they believe there is a serious crime involved. The additional evidence of buy money created no additional prejudice the defendant did not already face, and the error was harmless.

D. CUMULATIVE ERROR DOES NOT WARRANT REVERSAL

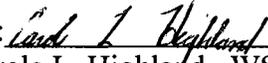
There was no substantive error in the trial. Even if there was error, it was harmless, as the bandana was admissible to show ownership, and there was significant evidence to show that Toscano was in possession of the pistol and shotgun, and any evidence of buy money was invited error, harmless and unobjected to. Any possible errors in this trial are insufficient to merit reversal, either individually or cumulatively.

VI. CONCLUSION

The jury rationally concluded beyond a reasonable doubt that Gabriel Toscano had firearms in his possession contrary to law, based on validly admissible evidence. The state asks the court to affirm the trial court in all respects.

Dated this 12th day of October 2010.

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