

FILED

JUL 31, 2012

Court of Appeals
Division III
State of Washington

NO. 30762-0-III

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

STATE OF WASHINGTON,

Respondent,

v.

JUAN CARLOS RODRIGUEZ,

Appellant.

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

The Honorable John M. Antosz, Judge
The Honorable Evan E. Sperline, Judge

BRIEF OF APPELLANT

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A. ASSIGNMENTS OF ERROR

1. The trial court erred when it denied appellant's motion to suppress evidence under CrR 3.6.¹

2. The trial court erred when it entered conclusion of law 3.4, which states, "The Court concludes as a matter of law . . . that there was a reasonable basis for a 'Terry stop' based upon suspicion that the vehicle and occupants were involved in the original incident" to the extent this is a finding there was reasonable suspicion at the time of the warrantless seizure.

Issues Pertaining to Assignments of Error

1. Police may not stop and detain individuals without a warrant unless they have particularized reasonable suspicion of criminal conduct. In this case, police pulled over the vehicle appellant was driving in response to a report that shots had been fired several blocks away and that a vehicle had left the area of those shots. Police did not have a description of the shooter; nor did they have a description of the vehicle involved. Did the trial court err when it found that police had reasonable suspicion of criminal activity at the time officers seized appellant?

¹ The court's CrR 3.6 findings and conclusions are attached to this brief as an appendix.

2. In concluding there was reasonable suspicion to justify the seizure, the trial court relied upon evidence gathered after the seizure had already taken place. Was this error?

B. STATEMENT OF THE CASE

1. Procedural Facts

The Grant County Prosecutor's Office charged Juan Rodriguez with Unlawful Possession of a Firearm in the First Degree and, alternatively, Unlawful Possession of a Firearm in the Second Degree. CP 1-2, 10-11. Rodriguez moved under CrR 3.6 to suppress all evidence against him. CP 12-14. The motion was denied. 1RP² 72-81; CP 15-18.

A jury found Rodriguez guilty of the greater offense, the trial court imposed a standard range 24-month sentence, and Rodriguez timely filed his Notice of Appeal. CP 31, 34-35, 49-50.

2. Facts Pertaining to Motion to Suppress/Trial

At the hearing on the motion to suppress and at trial, the State called only one witness: Moses Lake Police Officer Paul Ouimette. 1RP 7; 2RP 31.

At the pretrial hearing, Officer Ouimette testified that just

² This brief refers to the verbatim report of proceedings as follows: 1RP – March 8 and April 3, 2012; 2RP – March 21, 2012.

before 3:00 a.m. on the morning of January 1, 2012, he was dispatched from the Moses Lake Police Department in response to a call reporting a fight involving several people and two shots fired. 1RP 9, 11. Dispatch reported that a vehicle had left the scene, but there was no vehicle description. There was mixed information from the scene, but Ouimette was told the vehicle possibly was heading eastbound. RP 9-10.

As Officer Ouimette drove toward the address from where the report came, he observed a Red Grand Am. There were no other vehicles in the area. The car was heading eastbound, appeared to be accelerating, and was traveling about 35 miles per hour in a 25 mile-per-hour zone. 1RP 11-12, 14-16.

By the time Ouimette saw the Grand Am, it had been about two minutes since he received the dispatch, and the car was about five or six blocks from the address of the reported shooting. 1RP 16, 33. It appeared there were four or five occupants and the two individuals in the front seat were wearing blue, a color Officer Ouimette associates with local members of the Surenos gang. 1RP 18.

Officer Ouimette advised dispatch of the vehicle's license plate and followed the car. 1RP 18-19. He also asked units that had

arrived at the location of the reported shooting whether they had obtained a description of the vehicle involved. They had not. 1RP 19. Nor was there a description of the vehicle's occupants. 1RP 35. Dispatch advised that the Grand Am's registration had expired. 1RP 20. After following the car for three to four blocks – and the arrival of a second officer nearby – Ouimette activated his overhead lights to effectuate a stop. 1RP 19-23.

The Grand Am did not stop, however, for almost another mile. Ouimette shone his spotlight on the car and activated his siren. While continuing to follow the car, he could see furtive movements from the driver, front passenger, and one rear passenger. 1RP 20-25. When the car finally stopped, the front passenger exited and ran away. He was never found. 1RP 25-26. The other occupants were removed from the car and handcuffed. Under the driver's seat – where Rodriguez had been sitting – officers found a loaded handgun. 1RP 26-30.

In an oral ruling, the trial judge concluded there was reasonable suspicion to stop the car based on the time of night, the fact it was the only vehicle in the area, and the occupants' furtive movements. He also concluded that the subsequent search was warranted to assure officer safety. 1RP 73-81. The court entered

consistent written findings. CP 15-18.

Officer Ouimette's trial testimony was largely the same as his testimony at the hearing on the motion to suppress. 2RP 31-53. In addition, the parties stipulated that no fingerprints were found on the gun and Rodriguez had previously been convicted of a serious offense. 2RP 39-40.

C. ARGUMENT

THE TRIAL COURT ERRED WHEN IT DENIED RODRIGUEZ'S MOTION TO SUPPRESS.

Under the Fourth Amendment to the United States Constitution and article 1, § 7 of the Washington Constitution, warrantless searches and seizures are per se unreasonable unless the State demonstrates they fall within one of the "jealously and carefully drawn exceptions" to the warrant requirement. State v. Hendrickson, 129 Wn.2d 61, 70, 917 P.2d 563 (1996) (quoting Arkansas v. Sanders, 442 U.S. 753, 759, 61 L. Ed. 2d 235, 99 S. Ct. 2586 (1979)).

One of these narrow exceptions is the "Terry investigatory stop," discussed in detail in Terry v. Ohio, 392 U.S. 1, 20 L. Ed. 2d 889, 88 S. Ct. 1868 (1968). During a Terry stop, an "officer may briefly detain and question a person reasonably suspected of

criminal activity." State v. Watkins, 76 Wn. App. 726, 729, 887 P.2d 492 (1995) (quoting State v. Rice, 59 Wn. App. 23, 26, 795 P.2d 739 (1990)).

To justify an intrusion under Terry, an officer must be able to point to "specific and articulable facts which, taken together with rational inferences from those facts, reasonably warrant th[e] intrusion." State v. Williams, 102 Wn.2d 733, 739, 689 P.2d 1065 (1984) (quoting Terry, 392 U.S. at 21). Specific and articulable facts means that the circumstances must show "a substantial possibility that criminal conduct has occurred or is about to occur." State v. Kennedy, 107 Wn.2d 1, 6, 726 P.2d 445 (1986). An officer's objective basis for suspicion must be particularized because the "demand for specificity in the information upon which police action is predicated is the central teaching of [the Supreme] Court's Fourth Amendment Jurisprudence." Terry, 392 U.S. at 22 n.18.

When police have a particularized reasonable suspicion of criminal activity, they may stop the person, ask for identification, and ask the individual to explain his or her activities. State v. Alcantara, 79 Wn. App. 362, 365, 901 P.2d 1087 (1995). Moreover, officers may search for weapons within a vehicle if there are reasonable grounds to believe the individual is currently armed and dangerous

and the individual may gain access to the vehicle at some point. State v. Glenn, 140 Wn. App. 627, 633-636, 166 P.3d 1235 (2007).

As an initial matter, Rodriguez was seized – under article 1, section 7 – at the moment Officer Ouimette turned on his overhead lights in an attempt to pull the car over. A person is seized "when, by means of physical force or a show of authority, his or her freedom of movement is restrained and a reasonable person would not have believed he or she is (1) free to leave, given all the circumstances, or (2) free to otherwise decline an officer's request and terminate the encounter." State v. O'Neill, 148 Wn.2d 564, 574, 62 P.3d 489 (2003) (internal quotations and citations omitted).

Commands such as "halt," "stop, I want to talk to you," "wait right here," and the like qualify as seizures. See State v. Whitaker, 58 Wn. App. 851, 854, 795 P.2d 182 (1990), review denied, 116 Wn.2d 1028 (1991); State v. Ellwood, 52 Wn. App. 70, 73-74, 757 P.2d 547 (1988); State v. Sweet, 44 Wn. App. 226, 230, 721 P.2d 560, review denied, 107 Wn.2d 1001 (1986); State v. Friederick, 34 Wn. App. 537, 541, 663 P.2d 122 (1983).

In the context of automobiles, a traffic stop is a seizure. State v. Ladson, 138 Wn.2d 343, 350, 979 P.2d 833 (1999). The driver is seized. Delaware v. Prouse, 440 U.S. 648, 653, 99 S. Ct. 1391, 59

L. Ed. 2d 660 (1979). So are the passengers. Brendlin v. California, 551 U.S. 249, 251, 255-263, 127 S. Ct. 2400, 168 L. Ed. 2d 132 (2007). Moreover, failing to yield to the officer's show of authority does not affect whether a seizure, or even an arrest, has occurred. State v. Patton, 167 Wn.2d 379, 387, 210 P.3d 651 (2009); State v. Young, 135 Wn.2d 498, 504-510, 957 P.2d 681 (1998).

No reasonable person would have felt free to leave or otherwise terminate the encounter in this case once Officer Ouimette activated his overhead lights while following the car Rodriguez was driving. A seizure occurred at that moment. And because this was a warrantless seizure, it is justified only if Ouimette had reasonable suspicion of Rodriguez's involvement in criminal activity.

The State did not establish specific and articulable facts justifying a warrantless intrusion; i.e., a substantial possibility occupants of the car had been involved in criminal activity. Williams, 102 Wn.2d at 739; Kennedy, 107 Wn.2d at 6. The only information available to Officer Ouimette was that there had been shots fired and those involved may have been heading eastbound in a vehicle. There was no description of the vehicle's occupants or the vehicle itself.

The trial court appears to have agreed that Ouimette's initial observations of the car and its occupants were *insufficient*. In its written conclusions, the court found that given "the nature of the call; the time of the night; and the Grand Am being the only vehicle in the area on the otherwise empty streets, it was reasonable for Officer Ouimette to be curious." CP 17 (conclusion 3.2). Notably, curiosity is not a finding of reasonable suspicion justifying a stop.

The court then continues, "Officer Ouimette's additional observations: the failure of the Grand Am to pull over for about two minutes and the movements of the occupants as specifically described by Officer Ouimette might justify enhanced suspicion." CP 17 (conclusion 3.3). Only then does the court conclude there was reasonable suspicion to stop the car. CP 17-18 (conclusion 3.4); see also 1RP 78 (court's oral ruling: "the time of night and the fact that there weren't any other cars and the described movements of the occupants and the failure of the vehicle to pull over would in my estimation justify a reasonable suspicion . . .").

The problem with this analysis is that the occupants of the Grand Am had already been seized prior to Rodriguez's failure to pull over and prior to the furtive movements observed inside the car. As the court found:

Officer Ouimette turned on his light bar and attempted to stop the Grand Am. Officer Ouimette followed the vehicle with his lights on at about normal traffic speeds for about one mile and it did not stop for him. This took about two minutes. Officer Ouimette also had his siren on for what he estimated to be about 95% of that distance, and used his spotlight to attempt to get the driver's attention. As Officer Ouimette followed the Grand Am, he saw the occupants of the vehicle moving in their seats as if trying to conceal objects in the car and get access to the trunk.

CP 16 (findings 2.16 – 2.20).³

As discussed above, the seizure occurred when Ouimette turned on his light bar. Because Officer Ouimette did not have particularized reasonable suspicion at that time, the seizure was unlawful. The circumstances observed thereafter could not be used to justify that seizure. See State v. Lund, 70 Wn. App. 437, 451 n.12, 853 P.2d 1379 (1993) (improper to use post-seizure statements to justify seizure), review denied, 123 Wn.2d 1023 (1994).

Any evidence derived directly or indirectly from this illegal seizure must be suppressed unless sufficiently attenuated to be purged of the original taint. Wong Sun v. United States, 371 U.S.

³ Officer Ouimette's trial testimony also established this order of events. See 2RP 32-36 (overhead lights activated, failure to stop, siren and spotlight used, and furtive movements observed before car eventually pulled to side of road).

471, 484-88, 9 L. Ed. 2d 441, 83 S. Ct. 407 (1963); State v. Warner, 125 Wn.2d 876, 888, 889 P.2d 479 (1995); State v. Chapin, 75 Wn. App. 460, 463, 879 P.2d 300 (1994), review denied, 125 Wn.2d 1024 (1995). The courts apply a "but-for analysis." State v. Aranguren, 42 Wn. App. 452, 457, 711 P.2d 1096 (1985). But for the unlawful seizure, there would have been no discovery of the gun in the car, no criminal charge, and no conviction.

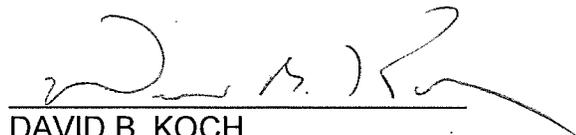
D. CONCLUSION

Rodriguez was seized without reasonable suspicion of criminal activity, and the subsequent search of the car was therefore improper. All evidence discovered following the illegal seizure must be suppressed, including the gun. Rodriguez's conviction must be reversed.

DATED this 31st day of July, 2012.

Respectfully submitted,

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APPENDIX



07-477358

RENEE CAMPBELL

FILED

MAR 12 2012

KIMBERLY A. ALLEN
Grant County Clerk

SUPERIOR COURT OF WASHINGTON FOR GRANT COUNTY

STATE OF WASHINGTON,

v.

JUAN CARLOS RODRIGUEZ,

Defendant.

Cause No. 12-1-00001-1

**FINDINGS OF FACT AND CONCLUSIONS
OF LAW ON HEARING PURSUANT TO
CrR 3.6**

I. HEARING

1.1 This matter came on for Hearing on the 8th day of March, 2012.

1.2 The Defendant was represented by RAFAEL A. GONZALES, and the State was represented by DOUGLAS R. MITCHELL, Deputy Prosecuting Attorney.

1.3 The Court received testimony from Officer Paul Ouimette, Moses Lake Police Department.

1.4 Based upon the testimony heard and the arguments of counsel, the Court announced its decision at the conclusion of the hearing.

1.5 The Court now enters the following Findings of Fact and Conclusions of Law in support of its decision:

II. FINDINGS OF FACT

2.1 There are no disputed facts.

2.2 The above named witness testified in open court.

- 1 2.3 Moses Lake Police officers were dispatched to a reported fight with shots fired at 906 W.
2 4th Avenue in Moses Lake, Washington just before 3AM on January 1st, 2012.
- 3 2.4 Additional information informed responding officers that a vehicle of unknown
4 description had left in the direction of the "Hang Out Tavern".
- 5 2.5 Officer Ouimette came into the area on Beech St within two minutes of the call.
- 6 2.6 Officer Ouimette was driving a fully marked police vehicle with an overhead light bar
7 and siren.
- 8 2.7 As he approached 4th Ave, Officer Ouimette observed a red Pontiac Grand Am
9 accelerating from the intersection of 4th Ave. and Dogwood.
- 10 2.8 The red Pontiac Grand Am's direction of travel was from the location of the original call.
- 11 2.9 Officer Ouimette saw no other moving vehicles on the roadway in the area.
- 12 2.10 As Officer Ouimette approached 4th Ave., he saw that there were five occupants in the
13 Grand Am.
- 14 2.11 Officer Ouimette could only see clearly those in the front seat as the vehicle passed.
- 15 2.12 Officer Ouimette turned and followed the vehicle and told dispatch and other officers
16 about the vehicle and its description, including its license plate number.
- 17 2.13 Officer Ouimette also followed up on the original dispatch information to see if there was
18 now a vehicle description, but there was not.
- 19 2.14 Officer Ouimette followed the vehicle while waiting for another officer to arrive before
20 attempting to stop the vehicle.
- 21 2.15 As he was northbound on Alder St. approaching Broadway Ave, Officer Ouimette was
22 informed that Corporal Loera was nearby.
- 23 2.16 Officer Ouimette turned on his light bar and attempted to stop the Grand Am.
- 24 2.17 Officer Ouimette followed the vehicle with his lights on at about normal traffic speeds for
25 about one mile and it did not stop for him.
- 26 2.18 This took about two minutes.
- 27 2.19 Officer Ouimette also had his siren on for what he estimated to be about 95% of that
28 distance, and used his spotlight to attempt to get the driver's attention.
- 29 2.20 As Officer Ouimette followed the Grand Am, he saw the occupants of the vehicle moving
in their seats as if trying to conceal objects in the car and get access to the trunk.

- 1 2.21 The vehicle stopped in the 100 block of West Northshore Dr..
2 2.22 As soon as the Grand Am stopped, the right front passenger got out of the car and ran.
3 2.23 The neighborhood was checked by other officers but the passenger was not located.
4 2.24 The remaining occupants of the car were removed at gunpoint and detained in handcuffs.
5 2.25 The driver was identified as Defendant, whom Officer Ouimette knew from prior
6 contacts.
7 2.26 Officer Ouimette was investigating the shots fired incident at the time of this contact.
8 2.27 If that investigation did not lead to arrest, Officer Ouimette would have taken
9 enforcement action for the failure to yield when he attempted to stop the Grand Am.
10 2.28 If Officer Ouimette had taken that enforcement action, Defendant would have been cited
11 and released, and allowed to re-enter the Grand Am.
12 2.29 The other occupants were going to be allowed to re-enter the Grand Am under either
13 scenario.
14 2.30 Officer Ouimette frisked the car for weapons to protect his safety and that of the other
15 officers.

16 III. CONCLUSIONS OF LAW

- 17
18 3.1 There are in essence three levels of encounter: contact, "Terry stop"¹, and arrest.
19 3.2 Based upon the above facts, specifically the nature of the call; the time of the night; and
20 the Grand Am being the only vehicle in the area on the otherwise empty streets, it was
21 reasonable for Officer Ouimette to be curious.
22 3.3 Officer Ouimette's additional observations: the failure of the Grand Am to pull over for
23 about two minutes and the movements of the occupants as specifically described by
24 Officer Ouimette might justify enhanced suspicion.
25 3.4 The Court concludes as a matter of law based upon the above facts that there was a
26 reasonable basis for a "Terry stop" based upon suspicion that the vehicle and occupants
27

28 ¹ Terry v. Ohio, 392 US 1 (1967)
29

1 were involved in the original incident.

2 3.5 To be "in custody" means that the suspect has been placed under arrest, or the suspect's
3 freedom of movement has been curtailed to a degree associated with formal arrest.

4 3.6 The Court concludes as a matter of law that this seizure was a "Terry stop", not an arrest.

5 3.7 A "Terry stop" must be reasonable in length of time and scope of frisk.

6 3.8 The Court concludes as a matter of law that under these facts, the stop and resultant frisk
7 were reasonable in duration and scope.

8 IV. ORDER OF THE COURT

9
10 The Court having had the opportunity to hear and consider the testimony of the above
11 named witness, and the arguments of counsel, and having made the above Findings of Fact and
12 Conclusions of Law, it is the Order of this Court that the results of the stop of the Grand Am and
13 Defendant are admissible in the State's case in chief.

14
15 DATED this 12th day of March, 2012.

16 
17 John M. Antosz
18 JUDGE of the Above Entitled Court

19 Presented by:

20 Approved as to form:

21 
22 TYSON R. HILL
23 WSBA #40685
24 Deputy Prosecuting Attorney

25 
26 RAFAEL A. GONZALES
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State v. Juan Carlos-Rodriguez

No. 30762-0-III

Certificate of Service by email

I Patrick Mayovsky, declare under penalty of perjury under the laws of the state of Washington that the following is true and correct:

That on the 31st day of July, 2012, I caused a true and correct copy of the **Brief of Appellant** to be served on the party / parties designated below by email per agreement of the parties pursuant to GR30(b)(4) and/or by depositing said document in the United States mail.

Grant County Prosecutor's Office
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Juan Carlos-Rodriguez
Doc No. 357114
Washington Corrections Center
P.O. Box 900
Shelton, WA 98584

Signed in Seattle, Washington this 31st day of July 2012.

X 