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No. 95707-0

SUPREME COURT OF
THE STATE OF WASHINGTON

(Court of Appeals No. 77094-2-I)

SOLOMON MCLEMORE,

Petitioner,

v.

CITY OF SHORELINE

Respondent.

CITY'S RESPONSE TO BRIEF OF AMICUS CURIAE
AMERICAN CIVIL LIBERTIES UNION OF WASHINGTON,
WASHINGTON ASSOCIATION OF CRIMINAL DEFENSE LAWYERS, AND
WASHINGTON DEFENDER ASSOCIATION

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I. INTRODUCTION

Respondent, the CITY OF SHORELINE, submits responsive briefing to the arguments presented by the amicus curiae American Civil Liberties Union of Washington (ACLU). Amici in this case argue that this Court should expand the constitutional rights of an individual to include active and open noncompliance of a lawful police order.

To accept amici's argument would significantly impact community and officer safety as well as curtail the response to domestic violence. The following is a brief in response to select points included in the ACLU's amicus brief. Points not specifically addressed herein are not conceded by the City of Shoreline, but are adequately addressed in the City's previous briefing. Respondent respectfully requests this Court affirm the Petitioner's conviction for obstructing.

II. ARGUMENT

A. ARGUMENTS PRESENTED BY AMICUS DISREGARD MCLEMORE'S AFFIRMATIVE ACTS THAT OBSTRUCTED LAW ENFORCEMENTS DUTY TO ENSURE THE SAFETY OF A DOMESTIC VIOLENCE VICTIM AND PURPORT POLICY ARGUMENTS CONTRARY TO LAW.

As identified in the City's supplemental briefing, this case deals with a narrow issue: Whether a homeowner who purposefully obstructs an officer's lawful constitutional entry into his home may be punished for his

behavior. As conceded, the warrantless entry into McLemore's home was lawful. Where the arguments diverge is on the issue of when an officer is licensed to make an entry, a person's resistance, whether passive or active, to an officer's lawful entry may result in consequences. Amicus further asks this Court to not only overturn McLemore's conviction, but to overturn controlling case law and adopt public policy that stands to endanger law enforcement as well as strip victims of domestic violence of protections the Washington State Legislature has so purposefully placed.

The statute at issue here makes actions by an individual that impedes the duties of law enforcement a criminal act. RCW 9A.76.020 provides that if the individual willfully hindered, delayed, or obstructed a law enforcement officer in the discharge of the law enforcement officer's official powers or duties; and knew that the law enforcement officer was discharging official duties at the time then he is guilty of a crime.¹

Solomon McLemore's conduct here hindered, delayed, and obstructed the officer's ability to discharge their duties to ensure the safety of the occupants of the residence, thus justifying the conviction for obstructing a law enforcement officer. The lineage of case law given to us

¹ RCW 9A.76.020 that provides in pertinent part, that "(1) A person is guilty of obstructing a law enforcement officer if the person willfully hinders, delays, or obstructs any law enforcement officer in the discharge of his or her official powers or duties."

by the Court of Appeals, Washington State Supreme Court, United States Supreme Court, as well as other jurisdictions on the issue presented by McLemore provides a clear and concise description of the law and the boundaries therein. The law followed by the Superior Court and Court of Appeals and their respective decisions thereon, confirms that McLemore's conviction was based upon constitutionally sound rationale and supported by the deep tenants of existing law. Therefore, this Court must affirm his conviction.

1. POLICY ARGUMENTS PRESENTED BY AMICUS CURIAE ARE INSUFFICIENT TO OVERRIDE CURRENT WASHINGTON CASE LAW.

Despite the long-standing precedent to the contrary, ACLU argues that a person may resist or refuse to affirmatively assist an officer's warrantless entry made pursuant to the emergency aid doctrine. Regardless of McLemore's belief in the legality of the police contact, the law states that his conduct may not impede the officer's duties, especially in light of the emergency doctrine. Amicus implores this Court to overturn well-established case law and adopt policy that contradicts not only the legislative intent of the statute but strips away decades of public policy aimed at protecting victims of violence.

- a. Limiting the application of the statute as McLemore proposes undermines existing law and Constitutional construction.

Amicus does not argue the constitutionality of the statute. Nor do they challenge the constitutionality of the warrantless entry. They instead argue that this Court should overturn controlling case law based upon what they consider unconstitutional policy implications. That upholding McLemore's conviction stands to expand police power and infringe on the exercise of constitutional rights. Given the factual circumstances of McLemore's case, such concerns are misplaced.

It is black letter law that a person may not be penalized for exercising a constitutional right. See, e.g., *U.S. v. Prescott*, 581 F.2d 1343, 1350-51 (9th Cir. 1978). A person may, however, be penalized for refusing to cooperate with a lawful order. This principle applies when the lawful order is based upon a search warrant or other court order. See, e.g., *United States v. Nix*, 465 F.2d 90, 93-94 (5th Cir.), *cert. denied*, 409 U.S. 1013 (1972) (refusal to provide a court ordered handwriting exemplar); *State v. Gonzalez*, 109 A.3d 453 (Conn.), *cert. denied*, 136 S. Ct. 84 (2015) (refusal to cooperate with search warrant authorizing the collection of a buccal swab for DNA testing); *State v. Haze*, 218 Kan. 60, 542 P.2d 720 (1975) (refusal to provide court ordered handwriting exemplar).

Washington courts have applied this principle, allowing juries to consider a refusal to cooperate as consciousness of guilt. *State v.*

Nordlund, 113 Wn. App. 171, 188, 53 P.3d 520 (2002), *review denied*, 149 Wn.2d 1005 (2003) (refusal to submit to court ordered body hair sampling). A refusal to cooperate may also result in a contempt finding and a prolonged period of pre-trial detention. *See State v. Miller*, 74 Wn. App. 334, 873 P.2d 1197 (1994) (14-month long civil contempt incarceration for refusing to provide a handwriting exemplar).

This principle also applies when a defendant refuses to comply with a lawful order that is based upon an exception to the warrant requirement *See, e.g., United States v. Terry*, 702 F.2d 299, 314 (1983) (resistance to providing prints pursuant to a lawful custodial arrest). A person can even be criminally prosecuted for refusing to comply with an officer's request to conduct a lawful warrantless search. *See, e.g., Birchfield v. North Dakota*, __ U.S. __, 136 S. Ct. 2160, 2186, 195 L. Ed. 2d 560 (2016) (affirming a conviction for refusing to submit to a warrantless breath test as that search was a permissible search incident to arrest for drunk driving); *State v. Colosimo*, 669 N.W.2d 1 (Minn. 2003), *cert. denied*, 541 U.S. 988 (2003) (refusing to submit to an officer's lawful request to inspect open areas of a motorboat used to transport game fish).

As a rule, a person has a constitutional right to passively² refuse a police officer's request to enter his or her home. *See generally Camara v. Mun. Court*, 387 U.S. 523, 87 S. Ct. 1727, 18 L.Ed.2d 930 (1967), *Georgia v. Randolph*, 547 U.S. at, 126 S. Ct. 1515, 164 L. Ed. 2d 208 (2006). However, as the facts so clearly show, McLemore's conduct here surpassed being *passive* resistance.

Amicus claims that McLemore is immune from prosecution for refusing to open his door. They cite numerous cases in which courts held that an individual cannot be punished for passively refusing to open his door to a police officer who seeks entry. While Amicus correctly cites the holdings of those cases, they are irrelevant in the instant case and their reliance on them is misguided. The cited cases involve police officers who demanded entry without a warrant and under circumstances in which no exception to the warrant requirement existed, or contained instances where protected speech alone was the only allegation. *District of Columbia v. Little*, 339 U.S. 1, 70 S. Ct. 468, 94 L.Ed.2d 599 (1950)

²A person is not allowed to use force to repel an officer's unconstitutional acts. *See generally State v. Valentine*, 132 Wn.2d 1, 935 P.2d 1294 (1997) (even if an arrest was unlawful, defendant was not permitted to use force to resist an arrest where the arrest did not involve excessive force); *State v. Mierz*, 127 Wn.2d 460, 901 P.2d 286 (1995) (a defendant may be convicted of an assault against police officers following the officers' illegal entry).

(passive refusal to open the door for a health inspector who did not possess a warrant or warrant exceptions, could not be penalized.); *U.S. v. Prescott*, 581 F.2d 1343, (9th Cir. 1978) (a home occupant can passively refuse admission to an officer who demands entry but presents no warrant, and no warrant exists.); *State v. Berlow*, 284 N.J. Super. 356, 665 A.2d 404 (1995) (passively refused warrantless entry when no exigent or community caretaking exceptions existed.); *Ballew v. State*, 245 Ga. App. 842, 538 S.E.2d 902 (2000) (verbal assertion alone of constitutional right cannot constitute obstructing without more.); *Beckom v. Georgia*, 286 Ga. App. 38, 648 S.E.2d 656 (2007) (refusal to answer knocking or ringing of the doorbell without more cannot constitute obstructing); *Harris v. State*, 314 Ga. App. 816, 726 S.E.2d 455 (2012) (simply refusing to answer questions cannot sustain a conviction for obstructing)

What they fail to recognize and address is the totality of McLemore's actions made in attempt to thwart the deputies' community caretaking duties. Here, McLemore's affirmative actions caused delay and impeded the Deputy's ability to ensure the safety of all inside the residence. While McLemore did eventually speak to the Deputy's through the closed door after several minutes of knocking and ringing the doorbell, he refused to open the door. Deputy's advised him of the need to ensure the safety of all those present yet to no avail. Deputy Emmons then heard

McLemore instruct the female to tell the police that she was okay. In addition to this command, McLemore told the female in a threatening manner that she had better appear “mad” when she spoke to police and then threatened her with her own impending arrest if she opened the door. The female complied with McLemore’s command and stated that she was okay, but McLemore would not allow visual confirmation. Despite their pleas and efforts to determine the actual safety of the female, McLemore continued to be uncooperative and walked away from the door, taking the victim with him. Given McLemore’s actions, Deputies were not able to gain entry and ensure the safety of the occupants until some eight minutes after initiating contact.

Here, McLemore actions were significantly more than simply not unlocking his door. The State of Washington as well as Courts across the country is steadfast in their recognition that there is no right to affirmatively resist or refuse to comply with law enforcement resulting in the hindrance, delay, or obstruction of their duties.

The Washington State Court of Appeals considered similar arguments in a similar context .in *State v. Steen*, 164 Wn. App. 789, 800-802, 265 P.3d 901, 908 (2011). *Steen’s* conviction for Obstructing was upheld in very similar facts and circumstances to McLemore’s case. The Court found that Steen’s action of not complying with the commands to

open the door, not just his silence, provided sufficient evidence that he willfully hindered, delayed, or obstructed the officers in their discharge of official duties. *Id.* The court explained that “any rational fact finder could have reasonably inferred that Steen ignored the officers’ commands.” *Id.* The court noted that the legislature’s intent in the plain language of RCW 9A.76.020 was to criminalize an individual’s willful failure to obey a lawful police order where the failure to obey willfully hinders, delays, or obstructs the officer in the discharge of his or her community caretaking functions. *Id.* See also, *State v. Contreras*, 92 Wn. App. 307, 966 P.2d 915 (1998). (Disobeying an officer’s orders to put his hands up into view and exit the vehicle was sufficient to support a conviction for obstructing).

McLemore did not have a constitutional right to disobey the lawful orders of the police officers. Thus, his delaying tactics may result in consequences. Amicus argues that reliance on *Steen* is inapposite as it stands to criminalize peaceful assertions of a Constitutional right. This interpretation is flawed. The arguments and policy considerations presented by Amicus here were the same identified in the dissent and

promulgated by the Amicus ACLU.³ The majority in *Steen* directly considered these arguments and rejected them outright.

“We do not hold, as the dissent suggests, that "private citizens have an affirmative obligation to assist police when they are performing their community caretaking function." *Dissent* at 915 n. 15. Private citizens have no such affirmative duty. Nor do we hold, as the dissent suggests, that private citizens commit obstruction of a law enforcement officer "every time they refuse to assist the police in performing their community caretaking function." *Dissent* at 916. A citizen's mere refusal to assist police officers performing their community caretaking duties, without more, is not a crime under the plain language of the obstruction statute. As our opinion makes clear, the citizen's conduct is criminal in these circumstances only when the State can prove beyond a reasonable doubt that (1) the citizen willfully failed to obey a lawful police order, and (2) the citizen's failure to obey had very specific consequences— namely, it hindered, delayed, or obstructed the officer while the officer was performing his or her community caretaking duties.

State v. Steen, 164 Wn.App. 789, 265 P.3d 901, (Div. 2 2011) n.8

³ Amicus ACLU cites several cases, including cases from other state courts and one Ninth Circuit case, *United States v. Prescott*, 581 F.2d 1343 (9th Cir.1978), to argue that an individual cannot commit obstruction by refusing to answer police knocks at the door. We have reviewed the state cases and do not find them persuasive. Additionally, we conclude that Prescott is distinguishable. There, the defendant refused to unlock her door to allow officers to search her apartment for a mail fraud suspect. *Prescott*, 581 F.2d at 1347. The court reversed the defendant's conviction for assisting a federal offender in order to prevent his apprehension, 18 U.S.C. § 3, because her "passive refusal to consent to a warrantless search [was] privileged conduct which cannot be considered as evidence of criminal wrongdoing." *Prescott*, 581 F.2d at 1351. Here, unlike in Prescott, the officers did not pressure Steen to consent to a warrantless search; rather, while trying to secure the scene of a disturbance and assist victims, the officers lawfully ordered any occupants of the trailer to exit with their hands up. *State v. Steen*, 164 Wn.App. 789, 265 P.3d 901, (Div. 2 2011), n.9

One of the leading cases furthering this rationale is *United States v. Ferrone*, 438 F.2d 381, (3d. Cir. 1971), cert denied, 402 U.S. 1008, 91 S.Ct. 2188, 29 L.Ed.2d 430 (1971). The Third Circuit stated that

“[s]ociety has an interest in securing for its members the right to be free from unreasonable searches and seizures. Society also has an interest, however, in the orderly settlement of disputes between citizens and their government; it has an especially strong interest in minimizing the use of violent self-help in the resolution of those disputes. We think a proper accommodation of those interests requires that a person claiming to be aggrieved by a search conducted by a peace officer pursuant to an allegedly invalid warrant test that claims in a court of law and not forcibly resist the execution of the warrant at the place of search. The develop[ment] of legal safeguards in the Fourth, Fifth, Sixth, and Fourteenth Amendment fields in recent years has provided the victim of an unlawful search with realistic and orderly legal alternatives to physical resistance.” *Id.* at 390 (emphasis added).

See also *State v. Line*, 121 Haw. 74, 214 P.3d 613, 625 (2009) (the risk of danger associated with physically resisting such an intrusion at the time it occurs, outweighs whatever vindication of personal rights might be accomplished through physical resistance at that moment)

This similar policy was upheld in *Dolson v. United States*, 948 A.2d 1193, 1201 (D.C. 2008). In holding that there is no right to resist an unlawful entry, the court stated that “[t]he rationale for this rule is firmly rooted in public policy: “If resistance to an arrest or a search made under the color of law is allowed, violence is not only invited but can be

expected. Self-help exposes both the officer and the suspect to graver consequences than an unlawful arrest." *Id.* at 1202, (citing *State v. Hatton*, 116 Ariz. 142, 568 P.2d 1040, 1045-1046 (1977) (en banc) (citations omitted); see also *United States v. Pryor*, 32 F.3d 1192, 1195 (7th Cir.1994) (explaining that citizens must "endure even an unlawful arrest without resorting to force" because the "indignity and inconvenience" of an improper arrest do not outweigh the potential for injuries when a suspect is left to "make their own snap judgments about the legality of official demands").

Furthermore, an individual wronged by an unlawful search or arrest has recourse through legal means, such as the exclusionary rule or civil claims for constitutional rights violations, and need not resort to physical violence in order to protect his or her rights. *Id.* at 1202 (citing *Hatton*, 568 P.2d at 1045). See also, *State v. Hoagland*, 270 N.W.2d 778 (1978). (Defendant's assertion that they had a right to resist a search which they believed illegal was expressly rejected. No such right is recognized.); *State v. Holemann*, 103 Wn.2d 426, 693 P.2d 89 (1985) (an individual may not obstruct what is believed to be illegal police conduct); See also *State v. Reece*, 222 N.J. 154, 117 A.3d 1235 (2015) (a suspect is required to cooperate with the investigating officer even when the legal

underpinning of the encounter is questionable. Defendant's conduct in hampering law enforcement entry under emergency aid doctrine into his home constitutes obstruction); *State v. Colosimo*, 669 N.W.2d 1 (Minn. 2003), cert. denied, 541 U.S. 988 (2003) (refusing to submit to an officer's lawful request to inspect open areas of a motorboat used to transport game fish.); *State v. Wiedenheft*, 136 Idaho 14, 27 P.3d 873 (2001) (an individual may not resist or prevent an officer from making a warrantless entry into a residence made under exigent circumstances even if they believe the entry is unlawful.)

We also must not forget the implications on the ability to protect victims of domestic violence. By adopting the interpretation as suggested by McLemore and Amicus, it would stand to not only heighten the potential for violence and endangerment of law enforcement, but it would chill the protections afforded to victims of violence.

As asserted in the City's Supplemental briefing, this Court has repeatedly recognized that the officers have a duty to ensure the safety of all the occupants of the residence, especially in domestic violence situations. To the extent that it factors into granting an exception to the closely guarded warrant requirement in searches of a residence. The defendant's action here of actively refusing to open the door *in*

conjunction with commanding the victim as to what to say and how to act, as well as making threats of impending arrest if she cooperated, can be considered for no other purpose than to obstruct the Deputies' ability to ensure and determine the occupants' *actual* safety and wellbeing. To adopt the interpretations presented by Amicus would be to chill the intervention of domestic violence crimes, promote tampering with witnesses, and perpetuate the defiance of lawful police orders. It stands to follow also that there would be an increased risk for the use force and safety implications for law enforcement and involved citizens. Such an interpretation is not supported by the law and cannot stand.

III. CONCLUSION

McLemore did not have a constitutional right to resist or refuse to comply with law enforcement's orders to allow entry into his residence as the demand was lawful under the emergency exception to the warrant requirement. His actions were more than merely passive. They actively hindered, obstructed and delayed law enforcement from conducting their community caretaking duties by thwarting their efforts to ensure the safety of all the residents in response to a domestic disturbance 911 call. McLemore's conduct delayed the ability to carry out their duties and interfered with the officer's ability to get true and accurate information

regarding the safety of the occupants. Furthermore, his conduct was not grounded in constitutionally protected speech or conduct. For these reasons, and because the evidence of his conduct was sufficient to establish all elements of the crime of Obstructing, this Court must deny McLemore's appeal and the movement to overturn long-standing Washington law. Thus, his conviction for Obstructing a Law Enforcement Officer must be upheld.

Respectfully submitted this 2nd Day of October, 2018,

A handwritten signature in cursive script that reads "Carmen McDonald". The signature is written in black ink and is positioned above a horizontal line.

Carmen McDonald #32561
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SHORELINE PROSECUTOR'S OFFICE

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