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SUPREME COURT
STATE OF WASHINGTON
4/11/2019 2:53 PM
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SUPREME COURT No. 96508-1
BENTON COUNTY SUPERIOR COURT No. 18-2-02084-03

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

IN RE: THE MATTER OF:

THE RECALL OF STEVE YOUNG,
KENNEWICK CITY COUNCIL MEMBER

ON APPEAL FROM THE SUPERIOR COURT OF
BENTON, STATE OF WASHINGTON
Superior Court No. 18-2-02084-03

The Honorable Bruce A. Spanner, Judge

BRIEF OF APPELLANT

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APPELLANTS ATTORNEYS

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II. APPELLANTS ASSIGNMENT OF ERRORS

A. The Recall Court committed error by finding the allegation that Appellant Young violated the Fair Campaign Act was both legally and factually sufficient to support a Recall Petition.

B. The Recall Court committed reversible error by not holding that RCW.42.17A.56 “as applied” to Appellant Young’s factual situation violates his constitutionally protected first amendment rights.

III. ISSUES PRESENTED

A. Did the Recall Petition Court incorrectly hold that the forwarding of another person's e-mail for a luncheon was both factually and legally sufficient to violate RCW. 42.17A.56?

B. Does the application of RCW. 42.17A.56 as applied to the de minimus facts unduly infringe on Young's constitutional rights to free speech?

IV. STATEMENT OF THE CASE

On August 1, 2018 the respondent's filed a notice of recall petition with the Benton County Superior Court. CP 1. The original petition contained seven purported violations of Washington law alleging both misfeasance and malfeasance while the Appellant was in office.

The Benton County Prosecuting Attorney's office filed a memorandum of law on August 16th, 2-19 CP 2.

On August 23rd, 2-19 the appellant filed a motion, CP 12, objecting to the notice provided to the appellant, alleging that it was untimely under state court rules. On August 23rd, 2018, the appellant also filed an Answer to the Petition consisting of a Declaration of Counsel and a Declaration of Marie Mosely CP 10, 11 and 13. The Motion to Continue was granted by the hearings court on August 24th, 2018. CP 14 and the matter was continued to August 31st, 2018.

On August 31st, 2018 the Honorable Bruce Spanner conducted a hearing and determined that Count One (1) of the Petition for Recall was both factually and legally sufficient to grant the recall petition. Following the hearing the prevailing party, was to submit Finding of Facts and Conclusions of Law. When the petitioners failed to submit for the court's consideration the proposed findings.

The court set a hearing for the entry of the final order on September 26th, 2018.

At 3:30 p.m. on September 25th, 2019, the Petitioners filed a motion and Brief for Entry of Finals Orders and Nunc Pro Tunc.

On September 26th, 2018 the court continued the respondents' motion for Nunc Pro Tunc along with the date for entry of Findings of Fact, Order of Determination of Sufficiency, Adoption of Ballot Synopsis, and Certification of Transmittal which order that "The Ballot Synopsis be filed with the county clerk". The date was set for hearing was to be on October 18th, 2018.

On October 18th, 2018, the recall court denied the respondents motion and entered its final orders including Findings of Fact and Conclusions of Law, effective October 18th, 2018. CP 38

On October 18th, 2018, the Honorable Bruce Spanner of the Benton County Superior Court made a final ruling in In Re the Matter of Steve Young's Recall and on October 18th, 2018, the court issued its Order of Determination of Sufficiency, Adoption of Ballot Synopsis, and Certification of Transmittal, ordering that "The Ballot Synopsis" be filed with the county clerk. The ruling allowed count one (1), one of the seven allegations would proceed to ballot should the recall support's obtain a sufficient number of signatures' on a recall petition. The ruling denied the remaining six (6) counts from being presented as grounds for recall.

This final ruling by Judge Spanner started the clock for appeal for both parties as of October 18th, 2018 with a deadline of November 2nd, 2018.

On November 1st, 2018, Steven Young through his attorney's Robert J. Thompson and Kevin L. Holt effectively served notice that Mr. Young was appealing Judge Spanner's ruling allowing Count one to proceed forward as a recall in In re the Recall of Steven Young.

The appellant timely filed his Notice of Appeal on November 1st, 2018. CP 40

No other appeals were filed. The respondents did not file a cross appeal.

V. ARGUMENT ONE

The Washington Constitution provides the general framework for the recall of elective officers:

Every elective public officer in the state of Washington except [except] judges of courts of record is subject to recall and discharge by the legal voters of the state . . . from which he was elected whenever a petition demanding his recall, reciting that such officer has committed some act or acts of malfeasance or misfeasance while in office, or who has violated his oath of office, stating the matters complained of, . . . Is filed with the officer with whom a petition for nomination or certificate for nomination, to such office must be filed under the laws of this state, and the same officer shall call a special election as provided by the general election laws of this state¹ and the result determined as therein provided. CONST. art. I} § 33 (first alteration in original). "Misfeasance" and malfeasance" mean "any wrongful conduct that affects, interrupts, or interferes with the performance of official duty." RCW 29A.56.110(1). Misfeasance" also means the "performance of a duty in an improper manner," RCW 29A.56.110(1)(a)¹ and malfeasance" also means the "commission of an unlawful act," RCW 29A.56.110(1)(b).

A violation of the oath of office is the "neglect or knowing failure by an elective public officer to perform faithfully a duty imposed by law." RCW 29A.56.110(2).

Courts act as a gateway to confirm that the charges in a recall petition alleging malfeasance, misfeasance, or violation of oath of office are factually and legally sufficient before they are placed before the voters. RCW 29A.56.140; *In re Recall of Kast*, 144 Wn.2d 807, 813-151 31 P.3d 667 (2001). Courts do not evaluate the truthfulness of the charges but ensure that public officials are not subject to frivolous or unsubstantiated charges. RCW 29A.56.140; *In re Recall of Lindquist*, 172 Wn.2d 120, 131-321 258 P.3d 9 (2011).

The proponent of the recall petition bears the burden of establishing that the charges alleged in the recall petition are both legally and factually sufficient. See *In re Recall of Sun*, 177 Wn.2d 251, 255, 299 P.3d 651 (2013). The superior court makes the initial sufficiency determination, subject to de novo review by this court. See RCW 29A.56.140; *In re Recall of Telford*, 166 Wn.2d 148, 154, 206 P.3d 1248 (2009). We determine sufficiency from the face of the recall petition. *In re Recall of Telford*, 166 Wn.2d at 153.

Factual sufficiency requires that the recall petition concisely states each charge with a detailed description including the approximate date, location, and nature of each act' that, if accepted as true, would constitute a prima facie case of misfeasance, malfeasance, or the violation of the oath of office." *In re Recall of Sun*, 177 Wn.2d at 255 (quoting RCW 29A.5 .110). Each charge in the recall petition.

Must demonstrate that the petitioner “knows of identifiable facts that support the charge.” In re Recall of Reed, 156 Wn.2d 53,58, 124 P.3d 279 (2005).

Further, charges are factually sufficient only if they enable the voters and the challenged official to make informed decisions. In re Recall of Wasson, 149 Wn.2d 787, 791, 72 P.3d 170 (2003).

"Legal sufficiency requires that the petition state, with specificity, substantial conduct clearly amounting to misfeasance, malfeasance, or violation of the oath of office." In re Recall of Sun, 177 Wn.2d at 255. To establish legal sufficiency for each charge, the recall petition must identify the "standard, law, or rule that would make the officer's conduct wrongful, improper, or unlawfulIn re Recall of Ackerson, 143 Wn.2d 366, 377, 20 P.3d 930 (2001). "If recall is sought for acts falling within the elected official's discretion, the official must have acted with a manifest abuse of discretion." In re Recall of Sun, 177 Wn.2d at 255

The petitioners of the Recall Petition allege that Appellant Young committed malfeasance and or misfeasance by his actions and violated his oath of office.

The Appellant wishes to highlight the insufficient factual basis necessary to support the legal basis for a recall petition.

In the context of the recall petition misfeasance and malfeasance both mean any wrongful conduct that affects, interrupts or interferes with the performance of an official duty RCW 29.82.010(1). Misfeasance also means performance of a duty in an improper manner and malfeasance involves the commission of an illegal act. In re Robinson 156 Wn2nd 704.

The Appellant believes that the petitioners have failed to provide any evidence that he interfered with performance of an official duty. Likewise the petitioners have failed to provide factual bases to allege that Appellant Young intended to commit an unlawful act, In re Wade, 115 Wash.2nd 544 at 549 (1990).

In Wade as in this case, the petitioners have alleged the commission of malfeasance by an unlawful act, the intent to commit an unlawful act is also a required element of the violation alleged against Mayor Young.

This means that the allegations are factual sufficiency in satisfy the bases for the recall. As demonstrated in Pearsall-Stipek, 141 wash.2nd.765 (2000) the petitioners are required to demonstrate not only that the official intended to commit the act but also that the official intended to act unlawfully.

In the petition at issue in Appellant Young's case the petition fails to allege that Mayor Young intended to act unlawfully. Specifically claim one (1) regarding a campaign fund raising event, fails to establish that

Appellant Young's forwarding of an email to a city employee regarding that event somehow bestowed a special privilege on him because of his political position or in some way benefited his employer. Petitioners assertion that by forwarding the email to Marie Mosley, Mayor Young was soliciting a contribution on behalf of Dan Newhouse, is not a factually accurate rendition or interpretation of the facts or of the event.

RCW 42.17A.565(1) states, "No state or local official or state or local official's agent may knowingly solicit, directly or indirectly, a contribution to a candidate for public office, political party or political committee from an employee in the state or local official's agency." to begin with we must address the relationship between Mayor Young and Ms. Mosley. While Mayor Steve Young is an elected member of City Council, he is not the direct supervisor of Marie Mosley. Ms. Mosley is the City Manager for the City of Kennewick, appointed by City Council as a whole to serve in that role.

Regardless of where Ms. Mosley works, Ms. Mosley is technically an employee of a local agency the City of Kennewick.

Further the allegation that Mayor Young solicited a contribution towards Dan Newhouse's campaign from Marie Mosley is factually not true and is clearly a misinterpretation by the petitioners as demonstrated by reviewing the email exchange in context and its entirety and upon reviewing Ms. Mosley's and

Appellant Young's Declarations. The email was sent after business hours and there is no statement by Steve Young contained within this email, let alone a request or solicitation for a contribution. Young simply forwarded the notice, thus even on the face of the email, Young did not request Marie Mosley to donate or purchase a seat. Further, as stated in the Declaration of Steve Young, when he read Ms. Mosley's response the next day he immediately called her by phone and told her he did not want any money since he had already paid for the table. Steve Young also states that it was his intent to simply fill The table at his own personal expense, not to seek contributions; he merely wanted Ms. Mosley to know that she was invited to attend. Based upon the foregoing, a violation of RCW 42. 17A.565 did not take place when this luncheon notice was forwarded to Ms. Mosley.

A clearer representation of the factual case is set forth below:

1. On June 10, 2014, when Steve Young was Mayor of the City of Kennewick and a member of the Kennewick City Council, he forwarded an email he had received from Anitra Beruti, concerning the details for a June 26, 2014 Tri Cities Lunch with Dan Newhouse, a candidate for U.S. House of Representatives, to Marie Mosley at her City of Kennewick email address. Mr. Young forwarded the email using his personal phone and his private employer's email account. He did not use a City of Kennewick phone or the email system of the City of Kennewick to forward the email to Ms. Mosley, nor did he add any personal comments to the forwarded email.

All information contained above are from original petition CP1, Mosley Affidavit and CP 13.

2. Mr. Young did not directly solicit a campaign contribution from Ms. Mosley. However, the last paragraph of the forwarded email included a statement from Ms. Beruti to Mr. Young that could be perceived as an indirect solicitation by Mr. Young to Ms. Mosley. The forwarded statement from Ms. Beruti said, "Please email me the names of the 10 folks who will be sitting at your table. They can take care of payment at the lunch, no need to pay ahead of time. If you have any additional questions, please let me know. Thank you again for your help! "

3. On June 11, 2014, Ms. Mosley replied to Mr. Young's forwarded email by stating, "Thankyou Steve for the invitation. I would like to contribute towards a ticket (\$100) but as I mentioned, I am planning on taking that day off so will not be able to attend the event. I will provide you with the \$100 to go towards the table or just as a contribution (so you can also find someone else to actually sit at your table and attend lunch). Thanks!" Ms. Mosley used her City of Kennewick email account to reply to Mr. Young's forwarded email.

4. In a declaration from Steve Young signed October 5, 2017, Mr. Young stated that he had been invited to be a speaker at Dan Newhouse's announcement to run for Congress in 2014. He said he felt he should buy a table at the event with his own funds, which he did. He said when Ms. Mosley responded that she could not attend but would contribute money, he immediately called her to tell her he did not want any money since he had already paid for the table, but he wanted her to know she was invited.

Appellant Young stated that he has never reached out to anyone for funding for any candidate at any time, including for his own campaigns. He stated that he was not asking for money and did not accept money for Congressman Newhouse's campaign.

5. The Federal Election Commission reports for Dan Newhouse show receipt of a \$600 contribution from Steve Young on June 26, 2014, which was approximately two weeks after the date Mr. Young told Ms. Mosley he had already paid for the fundraiser table.

6. It appears that Ms. Mosley perceived the forwarded email to be a solicitation for a contribution to Mr. Newhouse's fundraiser. Mr. Young stated that his forwarded email was not a solicitation for a contribution to Dan Newhouse's 2014 campaign for Congress.

It is clear after review of the information that the hearings court had in front of it, that there was a factual and legal insufficiency to support the recall petition.

VI. ARGUMENT TWO

The first Amendment to the United States Constitution provides that citizens are provided the right to free speech and association. The respondent believes that RCW 42.17A.565 violates Young's constitutional right to protected political speech given the specific facts encompassing the petitioners claim. The sequence of events are not in dispute as to the emails that were sent. Young forwarded an email from Anita Beruti to the city manager of Kennewick. The forwarded email from Young private email account in no way represent a personal request for soliciting of campaign donations by Young affidavits already filed with the court reflect that there was a misunderstanding by the city manager that was rectified the next day.

The problem, in any case is to balance the Young's right to free speech as a private citizen and the public's right to be free from governmental corruption. The respondent acknowledges that the government has an interest in preventing situations where an elected official could hold hostage an employee if he or she did not advance a political donation. Factually, that appears not to be the case. The petitioners have failed to provide any evidence of a Political quid pro quo.

The United States Supreme Court has weighed in on these issues in *Citizens United vs. FEC* 558 U.S. 310 (2010). There the court emphasized that there has to be present a Quid Pro Quo corruption to trump Free speech under the first amendment.

That is political favors indirect exchange for monetary contributions. This is the only permissible governmental reason to justify the regulations which would contravene the First amendment. *Id.* 369. The petitioners have failed to provide any evidence that would justify denying Young his free speech rights especially given his political speech special status under the First Amendment. *Id.* 336-41 Young's sending a generic e-mail was clearly not an effort to obtain a Quid Pro Quo benefit.

Young believes that RCW 42.17A.565 as applied to the actions in this matter are unconstitutional. The court must consider whether the standard set forth in RCW 42.17A.565 has a chilling effect on First Amendment protected speech. In *Randall vs. Sorrell* 548 U.S. 230, (2006) the Supreme Court struck down Vermont's campaign contribution limits. Their contribution limits violated the first amendment citing among other factors, the impact that restrictions on contributions by political parties would have on the right to associate with a political party. *Randall* 548 U.S. @243

In the conventional account of the basic principles of constitutional adjudication, constitutional challenges can be sorted into two distinct categories: "facial" challenges and "as-applied" challenges.' A facial attack is typically described as one where "no application of the statute would be constitutional." In contrast, courts define an as-applied challenge as one "under which the plaintiff argues that a statute, even though generally constitutional, operates unconstitutionally as to him or her because of the plaintiff's particular circumstances."

Facial challenges, on the other hand, should be used sparingly and only exceptional circumstances. Perhaps the most well-known, succinct, and controversial' formulation of this idea was the Supreme Court's statement in *United States v. Salerno*;, that a "facial challenge to a legislative Act is, of course, the most difficult challenge to mount successfully "and will only succeed if a litigant can "establish that no set of circumstances exists under which the Act would be valid ."

See *Wash. State Grange v. Wash. State Republican Party*, 128 S. Ct. 1184, 1190-91(2008) {discussing the preference for as-applied challenges to facial Challenges.

The law of facial and as-applied challenges claims to answer the question of when a court can and should strike a statute down in its entirety in response to a successful constitutional challenge. The Supreme Court's position on this issue

can be readily summarized in one word: rarely. The Court has stated its general preference for applied challenges consistently, albeit often without much elaboration as to exactly how the preference should be implemented.

It came closest to announcing a test to determine whether a facial challenge is appropriate in *United States v. Salerno* (*Salerno*, 481 U.S. at 745. For the argument that overbreadth does not present an exception to the (separate but related) rule that a litigant cannot successfully challenge a statute that may constitutionally be applied to her, see Henry Paul Monaghan, *Overbreadth*, 1981 SUP. Cr. REV. 1. A more detailed account of this position, and of the overbreadth rule generally, is beyond the scope of this Article.) *Salerno*'s characterization of facial and as-applied challenges).when it announced its "no set of circumstances "test, under which a facial challenge to a statute cannot succeed if it has even a single constitutional application. Chief Justice Rehnquist, writing for the Court in *Salerno*, cited the First Amendment's overbreadth doctrine as the sole exception to the this rule.

In *Randall v. Sorrel*, (548 U.S.230 (2006). the Supreme Court struck down Vermont's campaign contribution limits scheme in its entirety even though Justice Breyer,in his opinion for the plurality, indicated that it might have been possible for the Court to address the law's constitutional flaws by severing certain provisions and leaving other parts of the law intact.¹⁵³ The contribution limits system at issue in *Randall* was part of a broader 1997 Vermont campaign finance law that also limited campaign expenditures, provided for disclosure and reporting

requirements, and created a voluntary public financing system for gubernatorial races. A group of politicians, voters, and political parties challenged the expenditure and contribution limits aspects of the law on First Amendment grounds. With respect to the expenditure limits, the Court found that the limits were unconstitutional in their entirety under the seminal 1976 case *Buckley v. Valeo* (*Buckley v. Valeo* 424 U.S.1 (1976)). The contribution limits presented a more difficult question but the Court held that they too violated the First Amendment citing, among other factors, the impact that the restriction on contributions by political parties would have on "the right to associate in a political party" and the law's failure to index contribution limits to adjust for inflation.

In light of these determinations, the Court had at least three possible avenues to remedy the constitutional defects:(1) strike down the Vermont campaign finance law as a whole (including the unchallenged reporting and disclosure provisions), (2) strike down as little of the law as possible, meaning the expenditure limits and some provisions of the contribution limits, or (3) strike down both the expenditure and contribution limits in their entirety but leave the other aspects of the law untouched .

The Court discussed the question of remedy only briefly, limiting its analysis to the second and third options.

It found that severing some of the law's contribution limits provisions was not a realistic option because "[t]o sever provisions to avoid constitutional

objection here would require us to write words into the statute (inflation indexing), or to leave gaping loopholes (no limits on party contributions)." In addition, the Court observed, there were a number of different ways in which the Legislature could address its constitutional objections.

Accordingly, it concluded that the "Vermont Legislature would have intended us to set aside the statute's contribution limits, leaving the legislature free to rewrite those provisions in light of the constitutional difficulties we have identified.

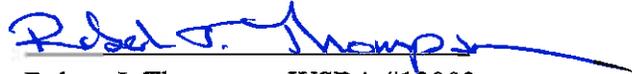
Here the Appellant believes that the facts relied upon by the Hearing's Court violate Mr. Young's right to political speech.

VI. CONCLUSION

The Appellant believes this Honorable Court should dismiss the Recall Petition because it failed to have sufficient factual and legal basis to go forward.

The Appellant further believes that RCW. 42.17A.565 "As Applied" violates Mr. Young's First Amendment Protections.

RESPECTFULLY SUBMITTED this 11th day of April, 2019.



Robert J. Thompson, WSBA #13003
Attorney for Appellant Steve



Kevin L. Holt, WSBA #16672
Attorney for Appellant Steve Young

VII. CERTIFICATE OF SERVICE

I CERTIFY under penalty of perjury under the laws of the State of Washington that I am a citizen of the United States and of the State of Washington, over the age of 18 years.

That on this day, I electronically mailed true and correct copies of the BRIEF OF APPELLANT TO THE SUPREME COURT OF THE STATE OF WASHINGTON; and this CERTIFICATE OF SERVICE, directed to the following:

- 1) James E. Wade – Email: wadejim75@gmail.com
- 2) Vincent C. Rundhaug - Via US Postal Service, a stamped and addressed envelope, affixed with the correct amount of postage to 911 W. Entiat Ave, Kennewick, WA. 99336 and for purposes of expedited delivery via email to desertgemstudio@aol.com
- 3) Robert McClary – Email: bigbobmclary@gmail.com
- 4) Charles Tamborello – Email: ctambur111@hotmail.com
- 5) Kevin L. Holt – email: holt.kevin.l@gmail.com
- 6) Steve Young – email: syoung.kennewick@gmail.com

DATED this 11th Day of April, 2019



April H. Moody
Legal Assistant to Robert J. Thompson

ROBERT J THOMPSON LAW OFFICE

April 11, 2019 - 2:53 PM

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Appellate Court Case Title: In the Matter of the Recall of Steve Young
Superior Court Case Number: 18-2-02084-8

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