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STATE OF WASHINGTON
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SUPREME COURT NO. 97148-0

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

v.

JAMIE HUGDAHL,

Petitioner.

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

The Honorable Scott R. Sparks, Judge

SUPPLEMENTAL BRIEF OF PETITIONER

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A. ISSUE ON REVIEW

Whether petitioner Jamie Hugdahl was deprived of her constitutional right to adequate notice of the criminal allegations against her when each of four unlawful drug delivery charges included an allegation it occurred within 1,000 feet of a “school bus route,” for which there are not adverse sentencing consequences if proved, when the jury was subsequently asked to decide if the deliveries occurred within 1,000 feet of a “school bus route *stop*,” for which there are adverse sentencing consequences if proved.

B. STATEMENT OF THE CASE

The Kittitas County Prosecutor charged Hugdahl with four unlawful drug delivery charges, one each for heroin, methamphetamine, Alprazolam and MDA. CP 58-59. The prosecution alleged that on January 19, 2017, Hugdahl delivered heroin, and that on January 20, 2017, Hugdahl delivered methamphetamine, Alprazolam and MDA. *Id.* The prosecution also alleged all four deliveries occurred within 1,000 feet of a “school bus route designated by the school district in violation of [RCW] 69.50.435.” CP 1-2, 5-6, 58-59.¹

¹ The prosecution amended the charging language three times after the initial charges were filed March 16, 2017. CP 1-2. The original information, and the first and third amended information included the language quoted above for each charge. The “Second Amended Information,” however, did not allege any aggravating circumstances. CP 45-46.

A jury trial was held June 27-28, 2017, before the Honorable Judge Scott R. Sparks. RP² 1-327. The jury found Hugdahl guilty as charged, including that each delivery occurred “within one thousand feet of a school bus route *stop* designated by a school district.” CP 50-57 (emphasis added).

Hugdahl was sentenced to concurrent terms of 40 months of incarceration on each count, plus an additional 24 months for committing the offenses “in a protected zone” per RCW 9.94A.533(6),³ for a total term of 64 months of confinement. CP 64-65. Hugdahl appealed. CP 74.

One issue raised on appeal by Hugdahl was that she was deprived of her constitutional rights under U.S. Const. Amend. VI and Wash. Const. Art. I, § 22, to be adequately informed of the charges against her. Hugdahl argued the charging language accusing her of making the drug deliveries within 1,000 feet of a “school bus route” failed to provide adequate notice she would face an additional 24 months of confinement if found guilty of making the drug deliveries within 1,000 feet of a “school

² The two consecutively paginated volumes of verbatim report of proceedings cited herein are referenced as “RP.”

³ This statute provides:

An additional twenty-four months shall be added to the standard sentence range for any ranked offense involving a violation of chapter 69.50 RCW if the offense was also a violation of RCW 69.50.435 or 9.94A.827. All enhancements under this subsection shall run consecutively to all other sentencing provisions, for all offenses sentenced under this chapter.

bus route *stop*.” Brief of Appellant (BOA at 18-23; Reply Brief of Appellant (RBA) 5-8.

In a split decision, Division Three of the Court of Appeals affirmed Hugdahl’s judgment and sentence. State v. Hugdahl, No. 35428-8-III (Slip Op. filed April 2, 2019).⁴ As to Hugdahl’s claim the charging language failed to provide her adequate notice of the “school bus route stop” sentence enhancement allegation, the majority concluded;

The numerous informations repeatedly advised Ms. Hugdahl that she was alleged to have committed the four deliveries within 1,000 feet of a school bus route in violation of RCW 69.50.435.^[5] Bus routes have bus stops; a bus stop is part of a bus route. Advising a defendant that the crimes were committed within 1,000 feet of a bus route

⁴ A copy of the decision is attached as an appendix. The majority and dissenting opinions are separately paginated. Therefore, they are cited herein as ‘Appendix/Majority at [relevant page number]’ and ‘Appendix/Dissent at [relevant page number].’

⁵ RCW 69.50.435 provides:

(1) Any person who violates RCW 69.50.401 by manufacturing, selling, delivering, or possessing with the intent to manufacture, sell, or deliver a controlled substance listed under RCW 69.50.401 or who violates RCW 69.50.410 by selling for profit any controlled substance or counterfeit substance classified in schedule I, RCW 69.50.204, except leaves and flowering tops of marijuana to a person:

...

(c) Within one thousand feet of a school bus route stop designated by the school district;

...

... may be punished by a fine of up to twice the fine otherwise authorized by this chapter, but not including twice the fine authorized by RCW 69.50.406, or by imprisonment of up to twice the imprisonment otherwise authorized by this chapter, but not including twice the imprisonment authorized by RCW 69.50.406, or by both such fine and imprisonment. The provisions of this section shall not operate to more than double the fine or imprisonment otherwise authorized by this chapter for an offense.

necessarily included any bus stops along that route. Liberally construed, a bus route includes a bus stop.

Appendix/Majority at 6. In a footnote, the majority goes on to claim;

We have reached the same result with related charging document challenges to the school bus route stop enhancement in a series of unpublished cases. E.g., State v. Moore, noted at 145 Wn. App. 1038 (2008) [review denied 165 Wn.2d 1018 (2009)]; State v. Hopwood, noted at 138 Wn. App. 1009 (2007); State v. Jones, noted at 117 Wn. App. 1016 (2003); see GR 14.1.

Appendix/Majority at 6 n.2.

The dissent, however, would have dismissed the “school bus route stop” enhancement allegation without prejudice, reasoning:

Here, the charging document alleged that all four controlled substance deliveries committed by Ms. Hugdahl occurred "within one thousand feet of a school bus route designated by the school district in violation of [RCW] 69.50.435[(1)(c)]." Clerk's Papers at 58-59. But a person who delivers controlled substances within 1,000 feet of a designated school bus route does not violate the statutory aggravator. Instead, the statutory aggravator is violated when a person delivers controlled substances within 1,000 feet of a designated school bus route *stop*. The majority commits a logical fallacy by equating a bus route with a bus route stop. A bus route is not a bus route stop. A person can be within 1,000 feet of a bus route and still be one mile from a bus route stop. Because a bus route is not a bus route stop, I dissent.

Appendix/Dissent (Lawrence-Berrey, C.J. dissenting) at 1-2 (emphasis in original).

Hugdahl sought review in this Court, which was granted on September 5, 2019. Oral argument is scheduled for the morning of Tuesday, November 19, 2019.

C. ARGUMENT

AN ALLEGATION UNLAWFUL DRUG DELIVERIES OCCURRED WITHIN 1,000 FEET OF A *SCHOOL BUS ROUTE*, EVEN LIBERALLY CONSTRUED, FAILS TO PROVIDE NOTICE THE ACCUSED MUST DEFEND AGAINST SENTENCE ENHANCING ALLEGATIONS THAT THE DRUG DELIVERIES OCCURRED WITHIN 1,000 FEET OF A *SCHOOL BUS ROUTE STOP*.

C.J. Lawrence-Berrey properly analyzed Hugdahl’s challenge to the language purporting to accuse her of committing unlawful drug deliveries within 1,000 feet of a “school bus route stop,” which if proved would subject her to an additional 24 months of confinement. C.J. Lawrence-Berrey recognized the obvious; “A bus route is not a bus route stop. A person can be within 1,000 feet of a bus route and still be one mile from a bus route stop.” Appendix/Dissent at 2.

The two-judge majority, however, attempts to rescue the prosecution’s case by reasoning that because bus routes necessarily include bus stops, alerting Hugdahl she was charged with making unlawful drug deliveries within 1,000 feet of the “school bus route,” was sufficient to put her on notice that if the prosecution proved she committed the unlawful deliveries with 1,000 feet of a “school bus route *stop*” she

would serve an additional 24 months in prison. Appendix/Majority at 6.
This was error.

This Court should reverse the majority decision and conclude that even when liberally interpreted the charging language employed by the Kittitas County Prosecutor failed to adequately notify Hugdahl she must defend against an allegation she made unlawful drug deliveries within 1,000 feet of a school bus route *stop*, as proscribed by RCW 69.50.435(1)(c).

A charging document is constitutionally defective if it fails to include all "essential elements" of the crime. State v. Vangerpen, 125 Wn.2d 782, 787, 888 P.2d 1177 (1995); Hamling v. United States, 418 U.S. 87, 117, 94 S. Ct. 2887, 41 L. Ed. 2d 590 (1974); U.S. Const. Amend. VI; Wash. Const. Art. I, § 22.

“An ‘essential element is one whose specification is necessary to establish the very illegality of the behavior’ charged.” State v. Ward, 148 Wn.2d 803, 811, 64 P.3d 640 (2003) (quoting State v. Johnson, 119 Wn.2d 143, 147, 829 P.2d 1078 (1992)). “[E]ssential elements’ include only those facts that must be proved beyond a reasonable doubt to convict a defendant of the charged crime.” State v. Powell, 167 Wn.2d 672, 683, 223 P.3d 493 (2009) (lead opinion) (quoting State v. McCarty, 140 Wn.2d 420, 425, 998 P.2d 296 (2000)), overruled on other grounds by [State v. Siers, 174 Wn.2d 269, 276, 274 P.3d 358 (2012)] (adopting the position advanced by the lead opinion in Powell). Essential elements include statutory and nonstatutory elements. Kjorsvik, 117 Wn.2d at 101–02.

State v. Zillyette, 178 Wn.2d 153, 158, 307 P.3d 712 (2013).

"More than merely listing the elements, the information must allege the particular facts supporting them." State v. Nonog, 169 Wn.2d 220, 226, 237 P.3d 250 (2010) (citing State v. Leach, 113 Wn.2d 679, 688, 782 P.2d 552 (1989)). This is a requirement of the essential elements rule. State v. Simms, 171 Wn.2d 244, 250, 250 P.3d 107 (2011). "Failure to provide the facts 'necessary to a plain, concise and definite statement' of the offense renders the information deficient." Nonog, 169 Wn.2d at 626 (citing Leach, 113 Wn.2d at 690 (quoting JCrR 2.04(a)).

That an unlawful drug delivery occurred within 1,000 feet of a "school bus route stop" is just as important and essential as the other requirements of the information for a delivery charge because it increased the sentence beyond the statutory maximum sentence for the underlying offense. RCW 69.50.435(1)(c); State v. Recuenco, 163 Wn.2d 428, 434, 180 P.3d 1276 (2008).⁶

⁶ The Recuenco Court stated:

Sentencing enhancements, such as a deadly weapon allegation, must be included in the information. In re Pers. Restraint of Bush, 95 Wn.2d 551, 554, 627 P.2d 953 (1981). When the term "sentence enhancement" describes an increase beyond the maximum authorized statutory sentence, it becomes the equivalent of an "element" of a greater offense than the one covered by the jury's guilty verdict. Apprendi [v. New Jersey], 530 U.S. [466], 494 n.19[1], 120 S.Ct. 2348, 147 L.Ed.2d 435 (2000)]. Contrary to the dissent's assertions, Washington law requires the State to allege in the information the crime which it seeks to establish. This includes sentencing

A challenge to the sufficiency of a charging document is reviewed de novo. State v. Williams, 162 Wn.2d 177, 182, 170 P.3d 30 (2007). Where, as here, a charging document is challenged for the first time on appeal, it is to be "liberally construed in favor of validity." Kjorsvik, 117 Wn.2d at 102. Under a liberal standard of review, the appellate court undertakes a two-pronged inquiry: "(1) do the necessary facts appear in any form, or by fair construction can they be found, in the charging document; and, if so, (2) can the defendant show that he or she was nonetheless actually prejudiced by the inartful language which caused a lack of notice?" Kjorsvik, 117 Wn.2d at 105-06.

Under the first prong of the Kjorsvik test, the court looks at the face of the document only. Id. at 106. If a necessary element is neither found nor fairly implied in the charging document under the first prong, the reviewing court must presume prejudice and reverse. State v. McCarty, 140 Wn.2d 420, 425, 998 P.2d 296 (2000); State v. Brown, 169 Wn.2d 195, 198, 234 P.3d 212 (2010).

enhancements. See State v. Crawford, 159 Wn.2d 86, 94, 147 P.3d 1288 (2006) (stating that prosecutors must set forth their intent to seek enhanced penalties for the underlying crime in the information).

Recuenco, 163 Wn.2d at 435-45 (footnote omitted).

In Zillyette, the information alleged the defendant committed a “controlled substance homicide,”⁷ but failed to identify the controlled substance allegedly delivered that resulted in the death. 178 Wn.2d at 156. This Court first concluded that the identity of the controlled substance delivered that resulted in death is not necessarily an essential element of the crime of “controlled substance homicide.” 178 Wn.2d at 160. It did, however, note that not all controlled substance deliveries resulting in a death can be prosecuted as a “controlled substance homicide,” as RCW 69.50.415(1) explicitly limits such prosecutions to the delivery of only three of five classes of drugs listed under RCW 69.50.401(2)(a)-(e). Id. This Court reversed and dismissed the charge without prejudice, concluding that “[t]he identity of the controlled substance, or at least the schedule of the controlled substance, is an essential element of the crime of controlled substances homicide because such specification is necessary to establish the illegality of the act.” Id. at 160-61, 163. The Court also reiterated the rule that “The mere recitation of a “numerical code section” and the “title of an offense” does not satisfy

⁷ RCW 69.50.415(1) defines the crime of “controlled substances homicide”:

A person who unlawfully delivers a controlled substance in violation of RCW 69.50.401(2)(a), (b), or (c) which controlled substance is subsequently used by the person to whom it was delivered, resulting in the death of the user, is guilty of controlled substances homicide.” RCW 69.50.401(2) is divided into five subsections, (a)-(e). But as expressly stated in RCW 69.50.415(1), only subsections (a)-(c) apply to controlled substances homicide.

the essential elements rule.” Id. at 162 (citing City of Auburn v. Brooke, 119 Wn.2d 623, 627, 836 P.2d 212 (1992)).

In Recuenco, the information alleged the defendant assaulted his spouse with a “deadly weapon,” and the jury returned a special verdict finding the defendant was armed with a deadly weapon. Recuenco, 163 Wn.2d at 431–32. The Court held that the defendant was entitled to have the jury determine “if he was guilty of the crime and sentencing enhancement charged.” Recuenco, 163 Wn.2d at 440. Because the jury did not find the defendant was armed with a “firearm” during the commission of the charged offense, the court concluded the sentencing court erred by imposing the firearm enhancement. Recuenco, 163 Wn.2d at 439.

The situation here is similar to Zillyette and Recuenco because the allegations in the information here fail to establish the illegality of the alleged act and fail to match what the jury was asked to find. The information alleged Hugdahl made the deliveries within 1,000 feet of a “school bus route,” but jurors were asked to determine if they were made within 1,000 feet of a “school bus route stop.” Compare CP 58-59 (Third Amended Information) and CP 51, 53, 55, 57 (verdict forms for sentence enhancements). The body of the information affirmatively and specifically accuses Hugdahl of making the unlawful drug deliveries

within 1,000 feet of a “school bus route.” But there is no specific illegality or sentence enhancement consequence arising from making an unlawful drug delivery within 1,000 feet of a “school bus route.” See RCW 69.50.435, supra at n.3. There being no adverse consequence for making deliveries within 1,000 feet of a “school bus route,” Hugdahl had no reason to defend against that allegation.

As in Zillyette, the reference in the information to RCW 69.50.435 does not provide the required adequate notice. CP 58-59. “Requiring a defendant to locate the relevant code and determine ‘the elements of the defense from the proper code section’ is an ‘unfair burden to place on an accused.’” Zillyette 178 Wn.2d at 163 (quoting Brooke, 119 Wn.2d at 635).

None of the charging documents filed provided Hugdahl notice that the prosecution was accusing her of making the deliveries within 1,000 feet of a “school bus route *stop*,” which if proved, could lead to adverse consequences in the form of a longer sentence. CP 1-2, 5-6, 45-46, 58-59; RCW 69.50.435(1)(c)(emphasis added). The prosecution repeatedly failed to include the essential element that the delivery occurred within 1,000 feet of a “school bus route stop.” Nor can the “stop” element be reasonably implied from any of the charging language employed by the prosecution. As such, the prosecution’s charging language fails to pass

the first prong of the Kjorsvik inquiry. 117 Wn.2d at 105-06. The remedy for a defective charging document under these circumstances is dismissal without prejudice. Zillyette, 178 Wn.2d at 163.

The Court of Appeals majority decision reasons, “Bus routes have bus stops; a bus stop is part of a bus route. Advising a defendant that the crimes were committed within 1,000 feet of a bus route necessarily included any bus stops along that route. Liberally construed, a bus route includes a bus stop.” Appendix/Majority at 6. But the dissent correctly notes the “logical fallacy” employed by the majority of “equating a bus route with a bus route stop,” because one can “be within 1,000 feet of a bus route and still be one mile from a bus route stop.” Appendix/Dissent at 2.

The majority’s reliance on unpublished cases is also misplaced. Appendix/Majority at 6 n.2. The cited cases all involved the failure to include the language “designated by the school district” in the charging language. But they did include the language alleging the deliveries occurred within 1,000 feet of a “school bus route stop.” State v. Moore, noted at 145 Wn. App. 1038 (2008); State v. Hopwood, noted at 138 Wn. App. 1009 (2007); State v. Jones, noted at 117 Wn. App. 1016 (2003); see GR 14.1. Those decisions, employing a liberal interpretation, concluded that by identifying a “school bus route stop” in the charging language, it

was sufficiently implied that the school district necessarily designated those stops, and therefore the defendants received adequate notice of the charges against them. Id.

Unlike the unpublished cases relied on by the majority, the situation here is significantly different. Nothing in the charging language used here implies the prosecution is alleging the drug deliveries occurred within 1,000 feet of a “school bus route *stop*.” Unlike the unpublished cases, which properly recognized charging language used implied the bus stops were designate by the school district because they were identified as “school bus route stops,” nothing here implied the allegation pertaining only a “school bus route *stop*” instead of the entire bus route.

Simply put, it was unreasonable to equate ‘1,000 feet from a school bus route’ with ‘1,000 feet from a school bus route *stop*.’ They may be related concepts, but they are not the same because one refers to the entire “route” and the other only the stops on the route. When properly analyzed in the manner employed by C.J. Lawrence-Berrey, it is clear Hugdahl was not adequately advised because she was never on notice she had to defend against an allegation she conducted the deliveries within 1,000 feet of a school bus route *stop*. Therefore, this Court should reverse and dismiss the school bus route stop allegation against Hugdahl without prejudice.

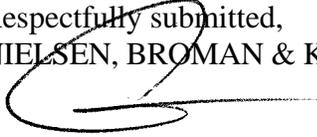
D. CONCLUSIONS

As C.J. Lawrence-Berrey correctly noted, bus routes have bus stops, but a bus route is not a bus route stop, it is merely the route the bus travels. A bus route stop is the specific locations the bus stops on that route. One can be within 1,000 feet of a school bus route, but still be miles from a school bus route stop. Being found to have made an unlawful drug delivery within 1,000 feet of a school bus route does not result in any sentence enhancements or other adverse consequences.

By failing to provide notice the jury would be asked instead to find Hugdahl unlawfully delivered drugs within 1,000 feet from a school bus route *stop*, which does have adverse consequences for Hugdahl if proved, the prosecution deprived her of her constitutional rights under U.S. Const. Amend. VI and Wash. Const. Art. I, § 22, to be adequately informed of the charges against her. This Court should therefore dismiss the allegation without prejudice.

DATED this 7th day of October 2019.

Respectfully submitted,
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