

FILED  
SUPREME COURT  
STATE OF WASHINGTON  
3/9/2020 12:05 PM  
BY SUSAN L. CARLSON  
CLERK

No. 98154-0

---

**SUPREME COURT OF THE STATE OF WASHINGTON**

---

JULIAN PIMENTEL,

Petitioner,

v.

THE JUDGES OF KING COUNTY SUPERIOR COURT, et al.,

Respondents.

---

**RESPONDENTS' ANSWER TO WRIT OF PROHIBITION**

---

DANIEL T. SATTERBERG  
King County Prosecuting Attorney

ANN MARIE SUMMERS, WSBA #21509  
Senior Deputy Prosecuting Attorney  
Attorney for King County

King County Prosecuting Attorney's Office  
King County Administration Building  
500 Fourth Avenue, Suite 900  
Seattle, Washington 98104  
(206) 296-0430, Fax (206)-296-8819

## TABLE OF CONTENTS

<b>I.</b>	<b>IDENTITY OF RESPONDENT.....</b>	<b>1</b>
<b>II.</b>	<b>ISSUES PRESENTED.....</b>	<b>1</b>
<b>III.</b>	<b>STATEMENT OF THE CASE.....</b>	<b>1</b>
<b>IV.</b>	<b>ARGUMENT.....</b>	<b>4</b>
	a. The King County Prosecuting Attorney is not a state officer. ....	4
	b. Pimentel has failed to show an absence or excess of jurisdiction, which is necessary for a writ of prohibition to issue.....	6
	c. Pimentel has failed to show an absence of an adequate remedy in appellate review.....	7
	d. CrR 2.2, which the superior court complied with in this case, is not unconstitutional.....	9
<b>V.</b>	<b>CONCLUSION .....</b>	<b>14</b>

## TABLE OF AUTHORITIES

### Washington Cases

<i>City of Yakima v. Mollett</i> , 115 Wn.App. 604, 63 P.3d 177 (2003).....	9
<i>Kreidler v. Eikenberry</i> , 111 Wn.2d 828, 766 P.2d 438 (1989).....	6
<i>Riddle v. Elofson</i> , 193 Wn.2d 423, 439 P.3d 647 (2019) .....	5, 6, 8
<i>Skagit County Public Hosp. Dist. No. 304 v. Skagit County Public Hosp.</i> <i>Dist. No. 1</i> , 177 Wn.2d 718, 305 P.3d 1079 (2013).....	6
<i>State ex rel. Dyer v. Twichell</i> , 4 Wash. 715, 31 P. 19 (1892).....	5
<i>State ex rel. Edelstein v. Foley</i> , 6 Wn.2d 444, 107 P.2d 901 (1940) .....	5
<i>State ex rel. Heidal v. Breseman</i> , 42 Wn.2d 674, 257 P.2d 637 (1953) .....	8
<i>State ex rel. Hollenbeck v. Carr, et al.</i> , 43 Wn.2d 632, 262 P.2d 966 (1953) .....	5
<i>State v. Barnes</i> , 146 Wn.2d 74, 43 P.3d 490 (2002).....	7
<i>State v. Barton</i> , 181 Wn.2d 148, 331 P.3d 50, 59 (2014).....	9
<i>State v. Beck</i> , 56 Wn.2d 474, 349 P.2d 387 (1960), <i>adhered to on reh'g</i> , 56 Wn.2d 474, 353 P.2d 429 (1960), and <i>aff'd</i> , 369 U.S. 541, 82 S. Ct. 955, 8 L. Ed. 2d 98 (1962) .....	13
<i>State v. Crowell</i> , 92 Wn.2d 143, 594 P.2d 905 (1979) .....	10
<i>State v. Huckins</i> , 5 Wn. App. 2d 457, 426 P.3d 797 (2018) .....	9
<i>State v. Ingram</i> , 9 Wn. App. 2d 482, 447 P.3d 192 (2019) .....	9
<i>State v. Jefferson</i> , 79 Wn.2d 345, 485 P.2d 77 (1971) .....	10
<i>State v. Judge</i> , 100 Wn.2d 706, 675 P.2d 219 (1984).....	12
<i>State v. Long</i> , 104 Wn.2d 285, 705 P.2d 245 (1985).....	12
<i>State v. Posey</i> , 174 Wn.2d 131, 272 P.3d 840 (2012).....	7
<i>State v. Reese</i> , 15 Wn.App. 619, 550 P.2d 1179 (1976).....	9
<i>State v. Slert</i> , 186 Wn.2d 869, 383 P.3d 466 (2016).....	12

*State v. Stewart*, 113 Wn.2d 462, 780 P.2d 844 (1989)..... 12, 13

**Federal Cases**

*Kaley v. U.S.*, 571 U.S. 320, 134 S.Ct. 1090, 188 L.Ed.2d 46 (2014)..... 13

*Kirby v. Illinois*, 406 U.S. 682, 92 S.Ct. 1877, 32 L.Ed.2d 411 (1972).... 12

*Rothgery v. Gillespie County, Tex.*, 554 U.S. 191, 128 S.Ct. 2578, 171

L.Ed.2d 366 (2008) ..... 13, 14

*U.S. v. Mandujano*, 425 U.S. 564, 96 S.Ct. 1768, 48 L.Ed.2d 212 (1976)13

**Constitutional Provisions**

Fifth Amendment ..... 12

Sixth Amendment ..... 12, 13, 14

**Washington Constitutional Provisions**

Wash. Const. art. I, § 20..... 7

Wash. Const. art. I, § 22..... 12

Wash. Const. art. IV, § 4..... 4, 5

Wash. Const. art. IV, § 6..... 6, 7, 10

Wash. Const. art. VI, § 8..... 5

Wash. Const. art. XI, § 5..... 5

**Rules**

CrR 2.1 ..... 13

CrR 2.2.....	passim
CrRLJ 3.2.1.....	10
RAP 16.2(a).....	4
RAP 16.2(d).....	5

**Other Authorities**

James L. High, <i>Extraordinary Legal Remedies</i> , 709 (3d ed. 1896).....	8
---	---

**I. IDENTITY OF RESPONDENT.**

The Judges of King County Superior Court and Dan Satterberg, King County Prosecuting Attorney, request that this Court deny the application for writ of prohibition.

**II. ISSUES PRESENTED.**

1. Whether the application for writ of prohibition against the King County Prosecuting Attorney should be dismissed where prosecuting attorneys are not state officers.
2. Whether the application for writ of prohibition should be dismissed where petitioner has failed to show an absence or excess of jurisdiction.
3. Whether the application for writ of prohibition should be dismissed where petitioner has failed to show the absence of an adequate remedy in the course of legal proceedings.
4. Whether the application for writ of prohibition should be dismissed where petitioner has failed to show that the bail practice that he is challenging, which is authorized by CrR 2.2, is unconstitutional.

**III. STATEMENT OF THE CASE**

In April of 2018, Julian Pimentel was charged in King County Superior Court with the felony of assault in the second degree, with a sexual

motivation allegation. Appendix 6.<sup>1</sup> Nine months later, in January of 2019, the State dismissed the charge in the interest of justice. Appendix 27.

The charge arose from an incident that occurred on February 10, 2018. Appendix 8. The incident was reported to Federal Way Police on March 18, 2018. Appendix 8. A.R.W. reported to Officer Wong that Pimentel had sexually assaulted her while she was intoxicated and unable to consent. Appendix 8-9. A child forensic interview was conducted. *Id.* Federal Detective Adams conducted additional investigation, including taking recorded statements from three additional witnesses. Appendix 10.

On March 30, 2018, Detective Adams signed a “Statement of Probable Cause” on a document entitled “Superform,” which very briefly, in seven sentences, set forth the allegation that Pimentel had sexual intercourse with A.R.W. while she was unable to consent. Appendix 1-2. That summary did not discuss whether there were any witnesses to the incident. *Id.* The Superform identified the offense as indecent liberties. *Id.* On the form, Detective Adams indicated that he was not requesting that the charges be “rush-filed” within 72 hours, and that he did not object to release of Pimentel. Appendix 2. On April 17, 2018, Pimentel turned himself in at

---

<sup>1</sup> Because Pimentel’s case involved a juvenile victim and juvenile witnesses and a crime of sexual violence, and because the charge against Pimentel was dismissed, the State has elected to redact identifying information from the Appendix, such as dates of birth, addresses, and identification numbers. The State will provide unredacted copies if the Court so directs.

the Federal Way Police Department at 11:40 a.m. and was placed under arrest. Appendix 1, 11. The Superform was filed with the King County District Court South Division at the Maleng Regional Justice Center the next day, April 18. Appendix 1.

On April 18, Pimentel was brought before District Court Judge Charles DeLaurenti. Dec. of David Allen In Support of Application for Writ of Prohibition, App. A. The State requested that the court find probable cause for the crime of rape in the second degree. *Id.* at 3. The court noted that it had read “the Affidavit of Probable Cause,” and made a finding of probable cause. *Id.* at 3. The court issued a Sexual Assault Protection Order, prohibiting Pimentel from contacting A.R.W., set to expire on May 9, 2018. Appendix 4-5. The State requested bail in the amount of \$150,000. Dec. of Allen, App. A, at 4. The court released Pimentel on personal recognizance and ordered him to appear the next day, April 19, at 2:45 p.m. Appendix 3.

On April 19, at 2:26 p.m., the State filed an Information charging Pimentel with assault in the second degree with a sexual motivation allegation. Appendix 6. The Information was supported by a four-page Certification for Determination of Probable Cause, dated April 17, which detailed Detective Adams’ investigation, including the statements of other witnesses. Appendix 8-11.

In the “Prosecuting Attorney’s Case Summary and Request for Bail and/or Conditions of Release” that accompanied the Information, the State noted that it had requested \$150,000 bail at first appearance, and that the District Court had released Pimentel on his personal recognizance. Appendix 7. The State also noted that the District Court was not aware of the statements from friends that corroborated A.R.W.’s account. *Id.*<sup>2</sup> The State requested bail in the amount of \$50,000. *Id.* The superior court made a finding of probable cause and fixed bail in the amount of \$50,000. Appendix 13-15. Pimentel posted bond that day and was released. Appendix 22. Pimentel was arraigned on May 3, 2018. Appendix 24. On that day, the superior court issued a Pre-trial Sexual Assault Protection Order, set to expire May 3, 2020. Appendix 25.

#### **IV. ARGUMENT**

##### **A. The King County Prosecuting Attorney is not a state officer.**

This Court has original jurisdiction in prohibition actions against “state officers” only. Wash. Const. art. IV, § 4; RAP 16.2(a). A superior court judge is a state officer for purposes of a writ of prohibition. *Riddle v.*

---

<sup>2</sup> Respondents disagree with Pimentel’s assertion that this was a misstatement. The “Statement of Probable Cause” on the Superform filed with the district court made no mention of the witnesses. Respondents believe that the “affidavit of probable cause” referenced by the district court was the Superform, not the Certification for Determination of Probable Cause later filed with the superior court.

*Elofson*, 193 Wn.2d 423, 428, 439 P.3d 647 (2019); *State ex rel. Edelstein v. Foley*, 6 Wn.2d 444, 448, 107 P.2d 901 (1940). However, the King County Prosecuting Attorney is a county officer, not a state officer.

This Court has concluded that superior court judges are state officers within the meaning of article IV, § 4 because they are state officers for purposes of other constitutional provisions. *Edelstein*, 6 Wn.2d at 448-49 (citing *State ex rel. Dyer v. Twichell*, 4 Wash. 715, 31 P. 19, 21 (1892) (superior court judges are state officers for purposes of art. VI, § 8 regarding election of state officers)). In contrast, the state constitution explicitly provides in article XI, § 5, that prosecuting attorneys are county officers, as are county commissioners, sheriffs, clerks, and treasurers. Wash. Const. art. XI, § 5. This Court has previously held that county commissioners are not state officers for purposes of article IV, § 4. *State ex rel. Hollenbeck v. Carr, et al.*, 43 Wn.2d 632, 638, 262 P.2d 966 (1953); Wash. Const. art. IV, § 4.

To the extent that Pimentel's writ of prohibition is directed toward the King County Prosecuting Attorney, who is not a state officer, it should be dismissed. RAP 16.2(d).

**B. Pimentel has failed to show an absence or excess of jurisdiction, which is necessary for a writ of prohibition to issue.**

A writ of prohibition is an extraordinary remedy. *Riddle*, 193 Wn.2d at 429. The writ is a “drastic measure,” which can be issued only when two conditions are met: (1) an absence or excess of jurisdiction, and (2) absence of a plain, speedy and adequate remedy in the court of legal procedure. *Skagit County Public Hosp. Dist. No. 304 v. Skagit County Public Hosp. Dist. No. 1*, 177 Wn.2d 718, 722-23, 305 P.3d 1079 (2013). A writ of prohibition issues to arrest execution of a future act, not to undo an action already performed. *Riddle*, 193 Wn.2d at 429. The writ will not issue simply to prevent error, to take the place of an appeal, or to serve as a writ of review for correction of an error. *Id.* Generally, a writ of prohibition may not be used to initiate review of a trial court decision. *Kreidler v. Eikenberry*, 111 Wn.2d 828, 840, 766 P.2d 438 (1989).

In this case, the writ could only issue if Pimentel made a showing that the superior court had exceeded its subject matter jurisdiction by issuing a warrant and setting a bail amount. *Id.* at 839. Pimentel has not attempted to make this showing.

There is no plausible argument that the superior court lacks subject matter jurisdiction to issue a warrant and make a bail determination when a felony charge is filed. Article IV, § 6 of the state constitution gives the

superior court jurisdiction over all felony criminal cases. Wash. Const. art. IV, § 6. Article I, § 20 of the state constitution provides that all persons charged with a crime shall be bailable, except for offenses punishable by life in prison. Wash. Const. art. I, § 20. CrR 2.2(a)(1) allows the superior court to issue a warrant for the arrest of the defendant once an information is filed and a finding of probable cause has been made.

The superior court has subject matter jurisdiction over felony cases, including the setting of bail. Pimentel argues that the superior court should not be allowed to increase bail *ex parte*. Presumably, he would concede that the superior court has the power to set bail at the same amount as the district court *ex parte*, or to increase bail if defense counsel were present. However, regardless of what procedure is followed, the superior court has subject matter jurisdiction over the felony case, including the bail determination. *State v. Posey*, 174 Wn.2d 131, 141, 272 P.3d 840 (2012) (superior court has original constitutional jurisdiction in all felony cases); *State v. Barnes*, 146 Wn.2d 74, 81, 43 P.3d 490 (2002) (superior court acquires jurisdiction with the filing of an information). For this reason alone, Pimentel's application for writ of prohibition should be dismissed.

**C. Pimentel has failed to show an absence of an adequate remedy in appellate review.**

The writ of prohibition is to be used with “great caution and forbearance.” *Riddle*, 193 Wn.2d at 429 (quoting James L. High, *Extraordinary Legal Remedies*, 709 (3d ed. 1896)). A writ will not issue if there is an adequate remedy that exists. *Riddle*, 193 Wn.2d at 433. A remedy is not inadequate merely because it is attended with delay, expense, annoyance, or even some hardship. *Id.* at 434. What constitutes an adequate alternative legal remedy depends on the facts of each particular case. *Id.* The writ of prohibition is not to be used to take the place of an appeal. *Id.* at 429.

In *Riddle*, this Court denied the writ of prohibition because *Riddle* could have sought a preliminary injunction and declaratory judgment, which would have provided an adequate remedy. *Id.* at 435. In *State ex rel. Heidal v. Breseman*, 42 Wn.2d 674, 675, 257 P.2d 637 (1953), this Court denied the writ of prohibition, holding that “the writ of prohibition does not lie in a criminal case because there is a plain, speedy and adequate remedy by appeal.”

The charge against Pimentel has been dismissed. Thus, this Court can provide him with no meaningful remedy.

Pimentel argues that his writ should be granted because it is the only effective means to address the issue as it pertains to future cases. This is incorrect. The bail practice could be challenged on appeal. Bail issues have

been raised and determined on their merits through the regular appeals process. *State v. Barton*, 181 Wn.2d 148, 168, 331 P.3d 50, 59 (2014) (interlocutory appeal holding that order requiring cash bail violated the state constitution); *State v. Ingram*, 9 Wn. App. 2d 482, 490, 447 P.3d 192 (2019) (reviewing technically moot bail issue because issue was of continuing and substantial public interest); *State v. Huckins*, 5 Wn. App. 2d 457, 464, 426 P.3d 797 (2018) (reviewing technically moot bail issue because issue presented a matter of continuing and substantial public interest); *City of Yakima v. Mollett*, 115 Wn.App. 604, 607, 63 P.3d 177 (2003) (reviewing technically moot bail issue because “the proper form of bail is a matter of continuing and substantial public interest”); *State v. Reese*, 15 Wn.App. 619, 620, 550 P.2d 1179 (1976) (reviewing bail issue and finding no error in refusal to reduce pretrial bail). The normal criminal appellate process provides an adequate alternative remedy. Pimentel has failed to show the absence of an adequate remedy and his writ of prohibition should be dismissed.

**D. CrR 2.2, which the superior court complied with in this case, is not unconstitutional.**

Finally, Pimentel has failed to show that the procedure that was followed in his case, which was authorized by CrR 2.2, was

unconstitutional. The Sixth Amendment right to counsel attaches after the filing of the information and issuance of the arrest warrant or summons.

Pursuant to CrR 2.2(a)(1) and (2), when the State files a felony information, the superior court has authority to issue an arrest warrant once it finds probable cause to support the charge. If the superior court issues a warrant, it must set a bail amount if the offense is bailable. CrR 2.2(c). The warrant also “shall command that the defendant be arrested and brought forthwith before the court issuing the warrant.” CrR 2.2(c). The superior court has jurisdiction once a felony information is filed in superior court. Wash. Const. art. IV, § 6; *State v. Crowell*, 92 Wn.2d 143, 144-45, 594 P.2d 905 (1979).

If a suspect is arrested without a warrant prior to the filing of a felony charge in superior court, a judicial determination of probable cause must be made no later than 48 hours following the arrest pursuant to CrRLJ 3.2.1(a). This district court determination of probable cause only occurs if the State has not yet filed charges into the superior court. CrRLJ 3.2.1(g); *State v. Jefferson*, 79 Wn.2d 345, 350, 485 P.2d 77 (1971).

In this case, Pimentel was arrested by the detective on April 17, 2018. Appendix 1. The district court found probable cause and released Pimentel on his own personal recognizance the next day. Appendix 3. The district court’s finding of probable cause was based on the detective’s

seven-sentence “Statement of Probable Cause” on the Superform. Appendix 1-3.

The following day, the State filed an information in the superior court charging Pimentel with assault in the second degree with sexual motivation. Appendix 6. That charge was supported by a four-page Certification for Determination of Probable Cause that detailed the detective’s investigation, including the fact that the detective had interviewed three witnesses that corroborated the victim’s account. Appendix 10-11. The State advised the superior court of the district court decision releasing Pimentel and requested a warrant for Pimentel’s arrest with bail set at \$50,000. Appendix 7. The superior court issued a warrant and set bail at \$50,000. Appendix 13-16, 22.

The procedure followed in this case was the procedure laid out in the applicable court rules. Pimentel does not argue otherwise. However, Pimentel argues that the court rules violate the constitution. He is mistaken.

Pimentel argues that CrR 2.2 violates a criminal defendant’s right to be present and right to counsel, because the superior court finds probable cause, issues a warrant and sets a bail amount in the defendant’s absence. Of course, if the defendant was present, there would be no need to issue a warrant or summons. Putting that practical consideration aside, the right to be present and the right to have counsel present at court proceedings is

rooted in the Sixth Amendment and the state counterpart, article I, § 22. *State v. Slert*, 186 Wn.2d 869, 874, 383 P.3d 466 (2016). The right to counsel under the state and federal constitutions has been held to be coextensive. *State v. Long*, 104 Wn.2d 285, 288, 705 P.2d 245 (1985). While the Sixth Amendment right to counsel arises at all critical stages of a criminal prosecution, “no ‘critical stage’ arises for Sixth Amendment purposes prior to the initiation of formal judicial proceedings by citation or indictment.” *State v. Judge*, 100 Wn.2d 706, 714, 675 P.2d 219 (1984). See *Kirby v. Illinois*, 406 U.S. 682, 92 S.Ct. 1877, 32 L.Ed.2d 411 (1972) (no right to counsel at show up after arrest but before initiation of charges).

This Court’s decision in *State v. Stewart*, 113 Wn.2d 462, 474, 780 P.2d 844 (1989), is instructive. In *Stewart*, this Court noted the “Unfortunate Commingling of the Fifth and Sixth Amendments’ Guaranties of the Right to Counsel,” in prior case law. *Id.* at 469. This Court explained that the defendant’s Fifth Amendment right to counsel during custodial interrogation applies regardless of whether charges have been filed. *Id.* at 474. In contrast, the Sixth Amendment right to counsel attaches only after formal proceedings have been initiated against the accused, regardless of whether the accused is in custody. *Id.* The initiation of charges triggers the Sixth Amendment right to counsel as to those charges but does not preclude police interrogation of the defendant regarding unrelated charges in the

absence of counsel. *Id.* at 478-79. In short, the Sixth Amendment right to counsel is triggered by the filing of charges.

The filing of an information by the prosecutor, authorized by CrR 2.1 and 2.2, has replaced the grand jury system in Washington. *State v. Beck*, 56 Wn.2d 474, 349 P.2d 387 (1960), *adhered to on reh'g*, 56 Wn.2d 474, 353 P.2d 429 (1960), and *aff'd*, 369 U.S. 541, 82 S. Ct. 955, 8 L. Ed. 2d 98 (1962). Like the procedure set forth in CrR 2.1 and 2.2, a grand jury proceeding results in a determination of probable cause, the issuance of an indictment and the issuance of an arrest warrant. *Kaley v. U.S.*, 571 U.S. 320, 329, 134 S.Ct. 1090, 188 L.Ed.2d 46 (2014). Yet, a defendant has no Sixth Amendment right to be present or have counsel present for grand jury proceedings. *U.S. v. Mandujano*, 425 U.S. 564, 96 S.Ct. 1768, 48 L.Ed.2d 212 (1976).

Pimentel's reliance on *Rothgery v. Gillespie County, Tex.*, 554 U.S. 191, 128 S.Ct. 2578, 171 L.Ed.2d 366 (2008), is misplaced. In that case, Rothgery was brought before a Texas magistrate for an hearing at which a probable cause determination was made, bail was set and "Rothgery was formally apprised of the accusation against him." *Id.* at 194. Rothgery posted bond, which stated "Rothgery stands charged by complaint duly filed" with unlawful possession of a firearm. *Id.* at 196. He was indicted months later. *Id.* The Court noted that a complaint had been filed with the

magistrate at the hearing, and this was sufficient for the Sixth Amendment to attach. *Id.* at 199 n.9. In contrast, no complaint or charge was filed against Pimentel at the district court hearing. In fact, the Conditions of Release advised Pimentel that “EVEN THOUGH CHARGES HAVE NOT BEEN FILED ON THIS INVESTIGATION THE STATE MAY FILE CHARGES AT A LATER DATE.” Appendix 3 (emphasis in original). This is a crucial difference between the procedures in Texas and Washington. Moreover, the Court’s holding in *Rothgery* was that “counsel must be appointed within a reasonable time after attachment.” *Rothgery* 554 U.S. at 212. Since Pimentel had retained counsel, the question of appointment of counsel within a reasonable time of attachment is not presented in this case.

The superior court did not violate the Sixth Amendment by finding probable cause and issuing a warrant in the absence of Pimentel and his counsel.

## **V. CONCLUSION**

The application for writ of prohibition should be dismissed.

RESPECTFULLY SUBMITTED this 9<sup>th</sup> day of March, 2020.

DANIEL T. SATTERBERG  
King County Prosecuting Attorney

Respectfully submitted,

*/s/ Ann Marie Summers*

---

ANN MARIE SUMMERS, WSBA #21509

Senior Deputy Prosecuting Attorney

Attorney for King County

King County Prosecuting Attorney

500 Fourth Avenue, Suite 900

Seattle, WA 98104

(206) 296-0430 Fax (206) 296-8819

[ann.summers@kingcounty.gov](mailto:ann.summers@kingcounty.gov)

**PROOF OF SERVICE**

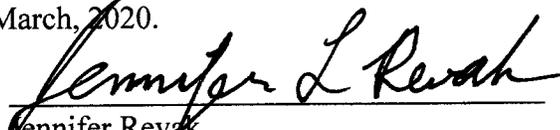
I, Jennifer Revak, declare as follows:

That I am over the age of 18 years, not a party to this action, and competent to be a witness herein; That on March 9, 2020, I caused the foregoing document to be e-filed and e-served electronically through Washington State Supreme Court's web portal as follows:

*Julian Pimentel*  
David Allen, Esq.  
Todd Maybrown, Esq.  
Cooper Offenbecher, Esq.  
Danielle Smith, Esq.  
Allen, Hansen, Maybrown, & Offenbecher, P.S.  
600 University Street Suite 3020  
Seattle, WA 98101  
(206) 447-9681  
[david@ahmlawyers.com](mailto:david@ahmlawyers.com)  
[todd@ahmlawyers.com](mailto:todd@ahmlawyers.com)  
[cooper@ahmlawyers.com](mailto:cooper@ahmlawyers.com)  
[danielle@ahmlawyers.com](mailto:danielle@ahmlawyers.com)

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Dated this 9<sup>th</sup> day of March, 2020.

  
Jennifer Revak,  
Legal Secretary to Ann M. Summers  
King County Administration Building  
500 Fourth Avenue, Suite 900  
Seattle, Washington, 98104

No. 98154-0

ANSWER TO WRIT OF PROHIBITION APPENDIX

Superform, District Court No. 218010696	1
Condition of Release, District Court No. 218010696	3
Sexual Assault Protection Order, District Court No. 218010696	4
Information, Superior Court No. 18-1-01217-8 KNT	6
Motion, Finding of Probable Cause and Order Directing Issuance of Summons or Warrant and Fixing Bail, Superior Court No. 18-1-01217-8 KNT	13
Notice of Appearance, Superior Court No. 18-1-01217-8 KNT	17
Sheriff's Return on Warrant of Arrest, Superior Court No. 18-1-01217-8 KNT	22
Clerk's Minutes, Criminal Arraignment Calendar, Superior Court No. 18-1-01217-8 KNT	24
Sexual Assault Protection Order, Superior Court No. 18-1-01217-8 KNT	25
Motion, Certification and Order of Dismissal, Superior Court No. 18-1-01217-8 KNT	27

Apr. 11. 2018 1:40PM

218010696

No. 6804 P. 16

1961757

**SUPERFORM**

CCN/JCN NUMBER	B/A NUMBER	PCN NUMBER
AGENCY: <input type="checkbox"/> UNINCORPORATED, KING COUNTY <input checked="" type="checkbox"/> CITY OF FEDERAL WAY		CASE NUMBER: 18-3899
		FILE NUMBER

DATE OF ARREST/TIME 4-7-18 1140	BOOKING DATE/TIME 4-7-18	ARREST LOCATION 33325 8th Ave S
NAME (LAST, FIRST, MIDDLE INI, SR, 1, 2, 3) PIMENTEL, JULIAN T.		ALIAS, NICKNAMES
IDENTITY IN COURT? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	DOB [REDACTED]	SEX: M RACE: W HGT: 504 WGT: 110 EYES: GRN HAIR: BRO SKIN/TONE:
SCARS, MARKS, TATTOOS, DEFORMITIES		ARMED DANGEROUS YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
LAST KNOWN ADDRESS [REDACTED]		CITY: BATE ZIP: RESIDENCE PHONE: BUSINESS PHONE: CITIZENSHIP: US
OCCUPATION:	EMPLOYER, SCHOOL (ADDRESS, SHOP/UNION NUMBER):	SOCIAL SECURITY NUMBER:
DRIVER'S LICENSE #:	STATE: WA APIS #:	FBI #:
VEHICLE LICENSE #:	STATE: YEAR: MAKE: MODEL:	VEHICLE LOCATION: TOW COMPANY:
PERSON TO BE CONTACTED IN CASE OF EMERGENCY		RELATIONSHIP: ADDRESS: CITY: STATE: PHONE:
1) OFFENSE <input type="checkbox"/> DV INDECENT LIBERTIES	RCW/CROW: BA, 44, 100	COURT/CAUSE: CITATION #:
2) OFFENSE <input type="checkbox"/> DV	RCW/CROW:	COURT/CAUSE: CITATION #:
3) OFFENSE <input type="checkbox"/> DV	RCW/CROW:	COURT/CAUSE: CITATION #:
4) OFFENSE <input type="checkbox"/> DV	RCW/CROW:	COURT/CAUSE: CITATION #:
ANY OTHER ADDITIONAL CHARGES		CRIMINAL TRAFFIC CITATION ATTACHED? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> ACCOMPLICES:
LIST VALUABLE ITEMS OR PROPERTY LEFT FOR AGENT/ES AT JAIL		
LIST VALUABLE ITEMS OR PROPERTY ENTERED INTO EVIDENCE YES <input type="checkbox"/> NO <input type="checkbox"/> IF YES DESCRIBE (SIMPLE DESCRIPTION, IDENTIFYING MARKS, SERIAL #)		
TOTAL CASH OF ARRESTEE \$:	WAS CASH TAKEN INTO EVIDENCE? YES <input type="checkbox"/> NO <input type="checkbox"/> AMOUNT: \$:	SIGNATURE OF JAIL STAFF RECEIVING ITEMS/SERIAL #:
ARRESTING OFFICER/SERIAL # R Adams 167	TRANSPORTING OFFICER/SERIAL #:	SUPERVISOR SIGNATURE/SERIAL #:
SUPERFORM COMPLETED BY (SIGNATURE/SERIAL #) R Adams 167		CONTACT PERSON FOR ADDITIONAL INFORMATION (NAME/SERIAL #/PHONE) FWPD RECORDS 253-836-8700

MISDEMEANOR BOOKINGS: Complete to this line. FELONY BOOKINGS: Complete both sides.				
OBJECTION TO RELEASE (MISDEMEANOR OR FELONY) IS ON REVERSE SIDE. <b>FILED</b>				
COURT FILE	SUPERIOR COURT <input type="checkbox"/>	IN CUSTODY <input type="checkbox"/>	COURT CAUSE (STAMP OR WRITE)	
	FILING INFO. <input type="checkbox"/>	AT LARGE <input type="checkbox"/>	APR 10 2018	
WARRANT INFO	COURT/DIST.	DIST. CT.	SUP. CT. DATE	WARRANT NUMBER
	CT. NO.	BOND \$	KCCS - SOUTH DIVISION MALENG REGIONAL JUSTICE CENTER	
WARRANT INFO	WARRANT DATE	OFF CODE OFFENSE	AMOUNT OF BAIL \$	FELONY <input type="checkbox"/> MISD <input type="checkbox"/> BENCH <input type="checkbox"/> ARREST <input type="checkbox"/>
	POLICE AGENCY ISSUING	COURT	WARRANT RELEASED TO: SERIAL UNIT DATE TIME	
	PERSON APPROVING EXTRADITION	SEAKING LOCAL ONLY WAC/C STATE WIDE <input type="checkbox"/>	NCIC WILL EXTRADITE FROM ID OR ONLY <input type="checkbox"/>	NCIC WILL EXTRADITE FROM OR, ID, MT, WY, CA, NV, UT, CO, AZ, NM, HI, AK <input type="checkbox"/>
ENTRY	CONP _____	DOE _____	OPC _____	DOO _____
	WACJ _____	YOE _____	OPC _____	YOC _____
	NICW _____	OPF _____	OPC _____	OPF _____

REV. 11/85

(PERFORATION DO NOT DUPLICATE BELOW THIS LINE)

ANSWER TO WRIT OF PROHIBITION  
APPENDIX 001

SUSPECT NAME: PIMENTEL, JULIAN T.

18-3699  
CASE NUMBER

**STATEMENT OF PROBABLE CAUSE: NON-VUCSA FELONY**

CONCISELY SET FORTH FACTS SHOWING PROBABLE CAUSE FOR EACH ELEMENT OF THE OFFENSE AND THAT THE SUSPECT COMMITTED THE OFFENSE. IF NOT PROVIDED, THE SUSPECT WILL BE AUTOMATICALLY RELEASED. INDICATE ANY WEAPON INVOLVED. (DRUG CRIME CERTIFICATE BELOW.)

ON 2-10-18 AT 29954 4 AVE S, WITHIN THE City of Federal Way, COUNTY OF KING, STATE OF WASHINGTON, THE FOLLOWING DID OCCUR:

On 2-10-18, Julian Pimentel had sexual intercourse with ARW (DOB: [REDACTED]) after giving her a large amount of alcohol (vodka) and she was unable to give her consent due to her level of intoxication. Earlier in the day, Pimentel, ARW, and ARW's friend went to the Commons Mall, where Pimentel stole a bottle of vodka. They all drank alcohol at the mall before eventually going to ARW's friend's house. At the house, ARW drank about 6 shots of vodka in 30 minutes while she was in a camper with Pimentel and two other friends. When ARW was heavily intoxicated (lying on a bed), Pimentel had the others leave the camper for about 30 minutes. Afterwards, Pimentel bragged that he "fucked the shit out of [ARW]" to one of ARW's friends. Later, when ARW was no longer under the effects of the alcohol, she recalled portions of what Pimentel did to her (including that Pimentel took off her clothing, that Pimentel was on top of her, that she felt pain in her vagina, that the camper was shaking, and that she heard Pimentel opening a condom wrapper. The next day, ARW's vagina felt sore and she was bleeding (although she was not on her period).

NON  
DRUG  
CRIME  
PROBABLE  
CAUSE

I CERTIFY (OR DECLARE) UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

REQUEST 72-HOUR RUSH FILE?  
YES  NO   
ANTICIPATED FILING DATE

DATE AND PLACE 3-30-18/ FEDERAL WAY WA

SIGNATURE/AGENCY *[Signature]*  
Federal Way PD

**DRUG CRIME CERTIFICATE**

Part I: On the suspect  DELIVERED  POSSESSED WITH INTENT TO DELIVER/MANUFACTURE  POSSESSED what the undersigned officer based on training and experience, believes to be (approximate quantity and type of controlled substance) .. Approximate street value of the controlled substance is (value of drug) \$00.  
Part II: FACTS INDICATING THE SUSPECT  DELIVERED  POSSESSED WITH INTENT TO DELIVER/MANUFACTURE or  POSSESSED THE CONTROLLED SUBSTANCE:

DRUG  
CRIME  
CERTIFICATE

On - at within the County of King, State of Washington,

My source of information about this crime (e.g., myself, other person with firsthand knowledge)

Other Facts:

I certify (or declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Date and Place: \_\_\_\_\_ Signature/Agency: \_\_\_\_\_

REQUEST 72-HOUR RUSH FILE? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	SODA ZONE YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	DRUG FREE ZONE? Exact location is required: YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
ANTICIPATED FILING DATE	LAB WORK REQUESTED? (Date/Type)	

LAW ENFORCEMENT OBJECT TO RELEASE? YES  NO . IF YES, EXPLAIN WHY SAFETY OF INDIVIDUAL OR PUBLIC WILL BE THREATENED IF SUSPECT IS RELEASED ON BAIL OR RECOGNIZANCE (CONSIDER HISTORY OF VIOLENCE, MENTAL ILLNESS, DRUG DEPENDENCY, DRUG DEALING, DOCUMENTED GANG MEMBER, FAILURE TO APPEAR, LACK OF TIES TO COMMUNITY). INCLUDE FARR GUIDELINES. DESCRIBE TYPE OF WEAPON. BE SPECIFIC.

TIES TO COMMUNITY (MARITAL STATUS, TIME IN COUNTY, ETC.)

CONVICTION RECORD:  SUBJECT ARMED/DANGEROUS  SUSPECT IDENTITY IN QUESTION  WARRANT(S) FOR FTA

HISTORY OF FTA'S (LIST)

PRELIMINARY APPEARANCE DATE \_\_\_\_\_ JUDGE \_\_\_\_\_ BAIL AMOUNT \$ \_\_\_\_\_

RETURN DATE	CONDITIONS	PR Y/N	RETURNED Y/N	EXCUSED Y/N
-------------	------------	--------	--------------	-------------

OBJECT TO  
RELEASE

DPA

KING COUNTY DISTRICT COURT  
STATE OF WASHINGTON

STATE OF WASHINGTON

Plaintiff

Case No: 218010696

vs

Julian Pimentel

Defendant

CONDITIONS OF RELEASE

Pending Filing of Charges

PROBABLE CAUSE FOUND (X) YES ( ) NO

IT IS ORDERED that the accused arrested on the 17 day of April, 2017  
for investigation of Indecent Liberties shall pursuant to CrRLJ3.2 be:

- Unconditionally released from the King County Jail - forthwith.
- Released from the King County Jail, on the following conditions:
  - The execution of surety bond or posting cash in the amount of \$ \_\_\_\_\_
  - Personal Recognizance
  - No contact with the victim or witnesses: ARW
  - Possess no weapons / alcohol / non-prescription drugs
  - Phone Block on telephone number: \_\_\_\_\_
  - No new law violations \_\_\_\_\_
  - Additional conditions: \_\_\_\_\_

- The defendant shall appear for a hearing on: 4/19/18
  - King County Correction Facility - 500 5<sup>th</sup> Avenue, Courtroom #1, Seattle, Washington at 2:30 pm or \_\_\_\_\_
  - Maleng Regional Justice Center - 401 4<sup>th</sup> Avenue North, Courtroom GB, Kent, Washington at 2:45 pm.

If you are in custody at the time of this hearing you will not be transported to court. Instead, if charges have not been filed you will be released from jail on this case number. If charges have been filed you will be transported to Superior Court for arraignment within 14 days. You may contact the jail staff in your unit to find out if charges have been filed.

Dated: 4-18-18

JUDGE / COMMISSIONER / PRO TEM

I have read the above conditions of release. I agree to follow said conditions and understand that any violation may lead to the forfeiture of any bond posted. I UNDERSTAND THAT EVEN THOUGH CHARGES HAVE NOT BEEN FILED ON THIS INVESTIGATION THE STATE MAY FILE CHARGES AT A LATER DATE.

Address: [Redacted] Phone: [Redacted]  
City: Renton WA Zip Code: 98370

Signed: [Signature] Copy received: Accused

If there is any change in your address, phone number or employment, you are to inform the Court immediately by phone: (206) 205-9200 or notify the King County Prosecutor by phone: RJC (206) 205-7485, Seattle (206) 296-9000.

FILED

APR 18 2018

KCJJD - SOUTH DIVISION  
MALENG REGIONAL JUSTICE CENTER

District Court of Washington  
for the County of King

No. 218010696

Investigation

Sexual Assault Protection Order  
RCW 7.90.150

State of Washington

Plaintiff

vs.

Julian T Pimentel

Defendant (First, Middle, Last Name)

Clerk's action required

1. Protected Person's Identifiers:

ARW

Name (First, Middle, Last)

DOB Gender Race

Defendant's Identifiers:

Date of Birth	
[REDACTED]	
Gender	Race
M	W

It is Ordered:

2. Defendant:

- A. shall not contact the protected person, directly, indirectly, in person or through others, by phone, mail, or electronic means, except for mailing or service of process of court documents through a third party, or contact by the defendant's lawyers; and
- B. shall not knowingly enter, remain, or come within \_\_\_\_\_ (1,000 feet if no distance entered) of the protected person's residence, school, workplace, other: \_\_\_\_\_

3.  Defendant: (when protected person is an intimate partner or child of intimate partner or defendant) (RCW 9.41.040):

- A. shall not harass, stalk, or threaten the protected person or engage in other conduct that would place the protected person in reasonable fear of bodily injury to the protected person; and
- B. shall not use, attempt to use, or threaten to use physical force against the protected person that would reasonably be expected to cause bodily injury.

4. This Sexual Assault Protection order expires on: 5-9-18  
 (Pre-Trial) two years from today if no date is entered.  
 (Post-Conviction) two years following the expiration of any sentence of imprisonment and subsequent period of community supervision, conditional release, probation, or parole.  
 RCW 7.90.150.

**WARNING: VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE UNDER RCW 26.50 AND WILL SUBJECT A VIOLATOR TO ARREST.**  
 You can be arrested even if the person protected by this order invites or allows you to violate the order's prohibitions. You have the sole responsibility to avoid violating the order's provisions. Only the court can change the order. (Additional warnings on page 2 of this order.)

5. **Firearms and Weapons, Defendant:** (RCW 9.41.800)

**Pretrial:**

- If a "serious" offense as defined in RCW 9.41.010, shall not possess a firearm.
- If not a "serious" offense, shall not obtain or possess a firearm and shall surrender any firearm or other dangerous weapon or any concealed pistol license (See findings in paragraph 8 below).

**Post Conviction:** shall not obtain, own, possess or control a firearm.

**Findings of Fact**

- 6. Based upon the record both written and oral at a hearing, the court finds that the defendant has been charged with, arrested for, or convicted of a sex offense as defined in RCW 9.94A.030, a violation of RCW 9.A.44.096, a violation of RCW 9.68A.090, or a gross misdemeanor that is, under RCW 9A.28, a criminal attempt, criminal solicitation, or criminal conspiracy to commit an offense classified as a sex offense under RCW 9.94A.030.
- 7. The court further finds that the defendant's relationship to a person protected by this order is an  intimate partner (former/current spouse; parent of common child; former/current dating; or former/current cohabitants) or  child of intimate partner, or  child of defendant, or  other family member as defined by RCW 10.99: \_\_\_\_\_.
- 8.  The court makes the following mandatory findings pursuant to RCW 9.41.800:
  - The defendant used, displayed, or threatened to use a firearm or other dangerous weapon in a felony.
  - The defendant is ineligible to possess a firearm due to a prior conviction pursuant to RCW 9.41.040;
  - or
  - Possession of a firearm or other dangerous weapon by the defendant presents a serious and imminent threat to public health or safety, or to the health or safety of any individual.
- 9.  The defendant represents a credible threat to the physical safety of the protected person. (RCW 9.41.040)

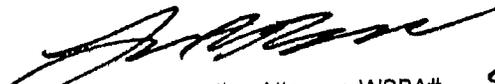
**Additional Warnings to Defendant:** This order does not modify or terminate any order entered in any other case. The defendant is still required to comply with other orders. Willful violation of this order is punishable under RCW 26.50.110. State and federal firearm restrictions apply. 18 U.S.C. § 922(g)(8)(9); RCW 9.41.040. Pursuant to 18 U.S.C. § 2265, a court in any of the 50 states, the District of Columbia, Puerto Rico, any United States territory, and any tribal land within the United States shall accord full faith and credit to the order.

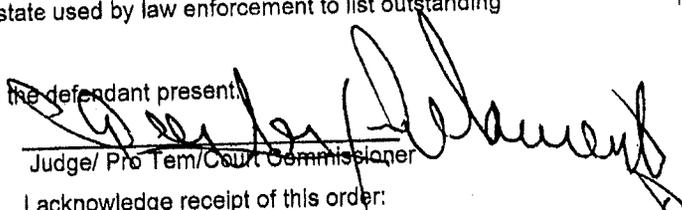
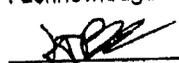
**Additional Orders**

10. The clerk of the court shall forward a copy of this order on or before the next judicial day to the originating policy agency: Federal Way Police Department, Police Incident 180003699 where the case is filed, which shall enter it in a computer-based criminal intelligence system available in this state used by law enforcement to list outstanding warrants.

Dated: 4-18-18  in open court with the defendant present.

Presented by:

  
 Deputy Prosecuting Attorney, WSBA# 51374

  
 Judge/ Pro Tem/Court Commissioner  
 I acknowledge receipt of this order:  
 DATE: \_\_\_\_\_  
 (Signature of Defendant)

I am a certified or registered interpreter or found by the court to be qualified to interpret in the \_\_\_\_\_ language, which the defendant understands. I translated this order for the defendant from English into that language.  
 Signed at (city) \_\_\_\_\_, (state) \_\_\_\_\_, on (date) \_\_\_\_\_  
 Interpreter: \_\_\_\_\_ print name: \_\_\_\_\_

FILED

18 APR 19 PM 2:26

KING COUNTY  
SUPERIOR COURT CLERK  
E-FILED  
CASE NUMBER: 18-1-01217-8 KNT

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

THE STATE OF WASHINGTON,	)	
	)	
v.	)	No. 18-1-01217-8 KNT
	)	
JULIAN T PIMENTEL,	)	INFORMATION
	)	
Defendant.	)	

I, Daniel T. Satterberg, Prosecuting Attorney for King County in the name and by the authority of the State of Washington, do accuse JULIAN T PIMENTEL of the following crime[s]: **Assault In The Second Degree—Sexual Motivation**, committed as follows:

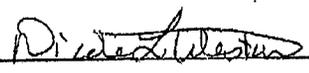
Count 1: Assault In The Second Degree-Sexual Motivation

That the defendant JULIAN T PIMENTEL in King County, Washington, on or about April 17, 2018, with intent to commit the felony of Indecent Liberties, did intentionally assault A.R.W. [REDACTED]

Contrary to RCW 9A.36.021(1)(e), and against the peace and dignity of the State of Washington.

And further do allege the defendant, Julian T Pimentel of commission of this crime with sexual motivation, that is: that one of the purposes for which the defendant committed this crime was for the purpose of his sexual gratification, under the authority of RCW 9.94A.835.

DANIEL T. SATTERBERG  
Prosecuting Attorney

By: 

Nicole L. Weston, WSBA #34071  
Senior Deputy Prosecuting Attorney  
Daniel T. Satterberg, Prosecuting Attorney  
CRIMINAL DIVISION  
Maleng Regional Justice Center  
401 4th Avenue North, Suite 2A  
Kent, WA 98032-4429  
(206) 477-3757 FAX (206) 205-7475

INFORMATION - 1

1  
2 CAUSE NO. 18-1-01217-8 KNT

3 PROSECUTING ATTORNEY CASE SUMMARY AND REQUEST FOR BAIL AND/OR  
4 CONDITIONS OF RELEASE

5 The State incorporates by reference the Certification for Determination of Probable Cause  
6 prepared by Officer Richard Adams of the Federal Way Police Department for case number  
7 180003699.

8 Pursuant to CrR 2.2(b)(2)(ii), the State requests a warrant because the defendant is likely  
9 to commit a violent offense. At the time of first appearance the State requested \$150,000.00.  
10 The court did not grant bail and released the defendant on his personal recognizance. At the time  
11 of first appearance the court was unaware that there were statements from friends that were with  
12 the victim and the defendant that day. In the certification for determination of probable case,  
13 which provides much more detail of the events of the day, the friends state that the victim was  
14 impaired both earlier in the day and during the time frame when the sexual assault occurred. The  
15 victim is only fifteen years old and was supplied liquor to by the defendant, which witnesses  
16 report that he stole. Given the new information from the friends regarding the victim's  
17 impairment the State respectfully requests the court set bail in the amount of \$50,000.00. The  
18 State is also seeking a sexual assault protection order for the victim.

19  
20 Signed and dated by me this 19th day of April, 2018.

21 

22 Nicole L. Weston, WSBA #34071  
23 Senior Deputy Prosecuting Attorney

24 Prosecuting Attorney Case  
Summary and Request for Bail  
and/or Conditions of Release - 1

Daniel T. Satterberg, Prosecuting Attorney  
CRIMINAL DIVISION  
Maleng Regional Justice Center  
401 4th Avenue North, Suite 2A  
Kent, WA 98032-4429  
(206) 477-3757 FAX (206) 205-7475



King County

eLODI  
PROSECUTING ATTORNEY'S OFFICE  
Certification for Determination of Probable Cause

That Richard Adams 167 is a Police Officer with the Federal Way Police Department and is familiar with the investigation conducted in Federal Way Police Department 180003699. There is probable cause to believe that PIMENTEL, JULIAN T, 2/8/2000 committed the crime(s) of:

- Indecent Liberties (Mentally Defective - Physically Helpless), in Federal Way

County of King, in the State of Washington.

This belief is predicated on the following facts and circumstances:

On 3-18-18, ARW (██████████) and her mother, Kali A, reported to Federal Way Police Officer N. Wong that, on or about 2-10-18, ARW was sexually assaulted by Julian Pimentel (██████████) while they were at RSP's (██████████) residence (██████████, Federal Way, King County, Washington).

ARW and RSP are friends. An acquaintance, NAC (██████████), was present at the time of the incident. Another friend, OBB (██████████) became involved by phone immediately after the incident. ARW knew Julian Pimentel for about a week prior to this incident; they were never previously in a dating or intimate relationship. A subsequent police investigation (conducted by Officer N. Wong and Detective R. Adams) revealed the following:

In her initial written statement and during a child forensic interview, ARW related the following: on 2-9-18, she went to stay at her biological father's residence for the weekend. ARW's father became intoxicated and began to purposely annoy ARW's brother, causing ARW to become upset. The next day, on 2-10-18, ARW decided to leave her father's house and walked to RSP's house.

RSP and ARW went to the Commons Mall (1928 S Commons, Federal Way) before going to OBB's house. OBB was not home, but they met with Julian Pimentel (who was staying with OBB at the time).

RSP, ARW, Julian Pimentel, and NAC then hung out at Taco Bell before they (with the exception of NAC) went back to the Commons Mall.

At the mall, Julian Pimentel stole a bottle of alcohol (later described by ARW as tequila) from Target. They then got a smoothie because RSP did not like the taste of alcohol.

RSP, ARW, and Julian Pimentel went into the women's restroom located in the food court. There, the three of them drank about a third of the bottle of alcohol.

RSP, ARW, and Julian Pimentel went to Kohl's where they sat on the beds. They then went to the movie theater courtyard.

They then walked RSP to the bus stop because RSP had to go home. ARW and Julian Pimentel then went back to the mall. ARW said she did not remember what they did at the mall after RSP left. ARW said that this was a chunk of time that she did not really remember. ARW then recalled that they went behind the mall where NAC shared a blunt with them.

ARW said that they went to OBB's house; however, OBB's mom said that they could not stay there. They then went to RSP's house at about 1930-2000 hours. RSP's mother allowed them all to stay the night.

At RSP's house, they all went downstairs to hang out. Then, all four of them (RSP, NAC, Julian Pimentel; and ARW) went to the camper. At the camper, ARW and the others (except Julian Pimentel) drank more alcohol. They hung out and talked.

Eventually, Julian Pimentel kicked out the others from the camper. At this point, ARW described her brain as feeling as if it was slowing down and as if she were in another dimension. ARW said that she only remembered flashes or



**King County**

**eLODI  
PROSECUTING ATTORNEY'S OFFICE  
Certification for Determination of Probable Cause**

*glimpses of what happened next.*

*ARW recalled Julian Pimentel taking off her clothes. ARW said that she was aware but not aware of what was happening. She said that she could see her body but couldn't do anything. ARW felt confused. When asked where she was at when her clothes were being taken off, ARW drew a diagram of the trailer. ARW explained that she was lying on the bed as Julian Pimentel took off her clothes. She said that Julian Pimentel was sometimes on top of her and sometimes down by her legs as he removed her clothing. ARW said she next remembered feeling a lot of pain and that this pain snapped her out of her state for a second. ARW said that she felt pain in her private area (vagina).*

*When asked what she next remembered, ARW said that she was later told by RSP that RSP and NAC came back to the camper 20 minutes later and that Julian Pimentel told them that they needed more time.*

*Next, ARW recalled being downstairs in RSP's house. ARW drew a diagram of the downstairs of RSP's house. She explained that she came downstairs with Julian Pimentel. She recalled that Julian Pimentel used NAC's cell phone to text OBB. ARW said that OBB then spoke with her and told her to get away from Julian Pimentel.*

*ARW related that RSP had the boys stay in the camper; ARW and RSP slept in the bedroom.*

*ARW said that she spoke with RSP and that ARW broke down when she realized what happened to her. RSP said she was sorry and that things would be okay. At this point, ARW said she was no longer feeling the effects of the alcohol.*

*ARW related to Child Forensic Interviewer A. Layrie that she first met Julian Pimentel about a week before this incident. She said that Julian Pimentel asked her if she was a virgin. ARW told Julian Pimentel that she was, and he asked when she planned on losing her virginity. ARW told Julian Pimentel that this was not something that somebody planned.*

*ARW related that the next day, OBB came back and that they went to OBB's house. The whole group (except Julian Pimentel) went to OBB's house as NAC had told Julian Pimentel that he was not welcome. However, ARW said that the group briefly ran into Julian Pimentel the next day. ARW did not talk to Julian Pimentel, but NAC approached him.*

*Afterwards, Julian Pimentel texted ARW via Instagram, but she did not respond to him.*

*ARW related that the next day, a condom was found in the camper. ARW then recalled hearing Julian Pimentel opening the condom wrapper at the time of the incident. ARW also said that she remembered the camper shaking. When asked to explain further, ARW said that she did not know how to put it. She said that they were having sex but that she didn't remember it.*

*After the incident, ARW said that she was bleeding a lot even though it was not her time for her period. ARW said her private area hurt (was sore) the next morning for a few hours.*

*ARW mentioned that from OBB, she heard that Julian Pimentel told him that ARW gave her consent to Julian Pimentel. However, ARW related that she did not remember if she consented to having sex with him.*

*After a break in the interview, ARW related that RSP and OBB told her that Julian Pimentel was 18 years old. ARW said that although she never directly told Julian Pimentel her age, he did know what grade she was in.*

*ARW related that there were a few times in the past that she had sipped alcohol but that this was the first time she had consumed tequila.*

*ARW described how she made her disclosure to her mother. ARW said that her mother was talking to her about her rights and how she could say no to things (including if somebody wanted to pressure her to have sex). ARW said that she broke down crying and then told her mother what happened.*

*When asked further about consent while they were in the camper, ARW said that she did not know if she said no to Julian Pimentel or otherwise indicated that she did not want to have sex with him.*



King County

eLODI  
PROSECUTING ATTORNEY'S OFFICE  
Certification for Determination of Probable Cause

ARW said that she had only known Julian Pimentel for a week prior to this incident. She said she had only seen Julian Pimentel twice. ARW said that they never had any conversation about dating or going out together.

ARW positively identified Julian Pimentel in a photographic lineup.

Detective R. Adams obtained recorded statements from NAC, RSP, and OBB.

NAC related that he met with RSP, ARW, and Julian Pimentel on 2-10-18. NAC's account of what happened prior to going to RSP's house was consistent with what ARW said happened. NAC described ARW as being visibly intoxicated while at the mall (swaying when she walked and slurring her speech). NAC also noted that Julian Pimentel was not very intoxicated.

At RSP's house, NAC related that they all hung out in the camper/trailer. NAC related that everybody except Julian Pimentel was drinking alcohol (vodka). In particular, NAC related that ARW drank about six shots of vodka in about a thirty minute timeframe. NAC said that ARW was lying on the bed and that Julian Pimentel was sitting next to her. Julian Pimentel asked to be left alone in the camper, so RSP and NAC left.

About thirty minutes later, NAC said they returned to the camper. After Julian Pimentel and ARW were no longer alone, Julian Pimentel repeatedly bragged to NAC, telling him that he "fucked the shit out of [ARW]."

NAC further related that it appeared obvious that ARW was heavily intoxicated and was not in a state to be able to give her consent. NAC also stated that Julian Pimentel had previously made comments to OBB that he was going to have sex with ARW (and that OBB had asked him not to).

RSP's account of what happened in the early part of the day was consistent with ARW's statement. RSP related that she, ARW, and Julian Pimentel consumed alcohol (vodka) the NAC stole from Target. RSP related that she noticed signs of impairment in the way ARW spoke and walked while at the mall, but she stated that ARW was tipsy but not overly drunk.

RSP said that later that evening, ARW, Julian Pimentel, and NAC showed up at her house. ARW threw rocks at RSP's window because ARW's cell phone had died. RSP and ARW subsequently convinced RSP's mother to allow them all to stay over for the night (with the understanding that the girls would sleep in the house and that the boys would sleep in the camper).

RSP said that they all hung out in the camper. RSP said that they drank more of the alcohol. RSP noticed that ARW was getting more drunk and described that ARW wasn't talking very much and would just laugh a lot (which is not normal for ARW).

Eventually, RSP said that Julian Pimentel told her and NAC that he needed them to leave the camper so that he could talk with ARW in private. RSP was skeptical about Julian Pimentel's motives but they eventually left ARW alone in the camper for about ten minutes. After ten minutes, RSP and NAC returned to the camper to check on ARW and Julian Pimentel. RSP said that ARW and Julian Pimentel were on the bed but could not tell much else. Julian Pimentel convinced RSP and NAC to leave again.

Afterwards, Julian Pimentel and ARW came into the house. Julian Pimentel asked to borrow NAC's cell phone in order to text OBB. RSP later found out from NAC that Julian Pimentel had texted OBB to tell him that he had "banged" ARW. ARW spoke with RSP. ARW was upset and disclosed that she believed that Julian Pimentel had raped her. ARW told RSP that she could not recall all of the details.

OBB related that he has known Julian Pimentel for about 7-8 years; he described OBB as being persistent and related that Julian Pimentel has addiction issues. OBB related he has known ARW for about 3-4 years.

OBB believed that Julian Pimentel and ARW met a short time (less than a week) before this incident. Julian Pimentel



eLODI  
PROSECUTING ATTORNEY'S OFFICE

**King County**

**Certification for Determination of Probable Cause**

*expressed interest in ARW, and OBB told Julian Pimentel not to pursue her (due to the age difference and Julian Pimentel's addiction issues).*

*On the date of the incident, OBB related that Julian Pimentel texted him with NAC's phone to let OBB know that he had "fucked" ARW. Later, Julian Pimentel had a conversation with OBB wherein he said that ARW had consented to have sex with him.*

*OBB related that ARW said she could not recall all of the details of what happened (as she had been drinking alcohol).*

*On 4-17-18, at about 1140 hours, Julian Pimentel turned himself in at the Federal Way Police Department. Julian Pimentel was arrested and booked into jail without incident. Julian Pimentel invoked his right to a lawyer and declined to provide any statements.*

Under penalty of perjury under the laws of the State of Washington, I certify that the foregoing is true and correct.  
Signed and dated by me this 17 day of April, 2018, at Federal Way, Washington.

This printout is from the King County Electronic Log of Detective Investigations (eLODI) system, where the above officer signed and transmitted this referral as permitted by GR 30 and LGR 30.

Rev 07/14 4/17/2018 1:53:20 PM(CT)

ID 26251

Page 4 of 4

ANSWER TO WRIT OF PROHIBITION  
APPENDIX 011

AGENCY: <b>Federal Way PD</b>	WA0173600	CASE NUMBER <b>180003699</b>	FILE NUMBER	PCN NUMBER	<b>SUPERFORM</b>
----------------------------------	-----------	---------------------------------	-------------	------------	------------------

ARREST INFORMATION		ACCOMPLICES
DATE & TIME OF VIOLATION <b>2/10/2018 10:30 PM</b>	CRIMINAL TRAFFIC CITATION ATTACHED? <input type="checkbox"/> YES <input type="checkbox"/> NO	
DATE OF ARREST/TIME <b>4/17/2018 11:40 AM</b>	ARREST LOCATION <b>FEDERAL WAY, WA 98003</b>	

SUSPECT INFORMATION		DOB	ALIAS, NICKNAMES
NAME (LAST, FIRST, MIDDLE/JR, SR, 1st, 2nd) <b>PIMENTEL, JULIAN T</b>			
ARMED/DANGEROUS <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IDENTITY IN COURT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	CITIZENSHIP <b>US</b>	
PHYSICAL DETAILS			
SEX <b>M</b>	HEIGHT <b>504</b>	WEIGHT <b>110</b>	SKIN TONE
RACE <b>W</b>		EYE <b>GRN</b>	HAIR <b>BRO</b>
SCARS, MARKS, TATTOOS, DEFORMITIES			
IDENTIFICATION DETAILS			
CCN	PRIOR BA # <b>0</b>	AFIS #	FBI #
STATE ID #		DRIVER'S LICENSE #	BSN
RESIDENCE		EMPLOYMENT / SCHOOL	
LAST KNOWN ADDRESS <b>POULSBO, WA 98370</b>		EMPLOYER, SCHOOL (ADDRESS, SHOP/UNION NUMBER)	
RESIDENCE PHONE		BUSINESS PHONE	OCCUPATION
EMERGENCY CONTACT			
PERSON TO BE CONTACTED IN CASE OF EMERGENCY		RELATIONSHIP	PHONE

CHARGE INFORMATION			
OFFENSE <input type="checkbox"/> DV <input type="checkbox"/> FUGITIVE	<b>F - INDECENT LIBERTIES</b>	RCW / ORD# <b>9A.44.100</b>	COURT / CAUSE # <b>/</b>
OFFENSE <input type="checkbox"/> DV <input type="checkbox"/> FUGITIVE		RCW / ORD#	COURT / CAUSE #
			CITATION #

WARRANT / OTHER			
WARRANT DATE	WARRANT NUMBER	OFFENSE	AMOUNT OF BAIL
ORIGINATING POLICE AGENCY		ISSUING AGENCY	WARRANT RELEASED TO: (SERIAL # / UNIT / DATE / TIME)

PROPERTY INFORMATION		
LIST VALUABLE ITEMS OR PROPERTY LEFT FOR ARRESTEE AT JAIL		
LIST VALUABLE ITEMS OR PROPERTY ENTERED INTO EVIDENCE (SIMPLE DESCRIPTION, IDENTIFYING MARKS, SERIAL #)		
LIST ITEMS ENTERED INTO SAFEKEEPING		
TOTAL CASH OF ARRESTEE <b>\$0.00</b>	WAS CASH TAKEN INTO EVIDENCE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	SIGNATURE OF JAIL STAFF RECEIVING ITEMS / SERIAL #
AMOUNT: <b>\$0.00</b>		

OFFICER INFORMATION		
ARRESTING OFFICER / SERIAL # <b>Adams, Richard 187</b>	TRANSPORTING OFFICER / SERIAL #	SUPERVISOR SIGNATURE / SERIAL #
SUPERFORM COMPLETED BY (SIGNATURE/SERIAL #) <b>Adams, Richard</b>		CONTACT PERSON FOR ADDITIONAL INFORMATION (NAME/SERIAL#PHONE)

COURT FILE		
SUPERIOR COURT FILING INFO	<input type="checkbox"/> IN CUSTODY <input type="checkbox"/> AT LARGE <input type="checkbox"/> OUT ON BOND	COURT CAUSE (STAMP OR WRITE)
COURT/DIST. CT. NO.	DIST. CT. BOND \$	SUP. CT. DATE

EXTRADITE			
PERSON APPROVING EXTRADITION	SEAKING-LOCAL ONLY WACIO-STATE WIDE <input type="checkbox"/>	NCIC-WILL EXTRADITE FROM ID & OR ONLY <input type="checkbox"/>	NCIC-WILL EXTRADITE FROM OR, ID, MT, WY, GA, NV, UT, CO, AZ, NM, HI, AK <input type="checkbox"/>
NCIC-WILL EXTRADITE FROM ALL 50 STATES <input type="checkbox"/>	DOE _____	TOE _____	OP _____
WAC _____	DOE _____	TOE _____	OP _____
NCIC _____	DOE _____	TOE _____	OP _____

PROBABLE CAUSE INFORMATION
<b>STATEMENT OF PROBABLE CAUSE: NON-VUCSA</b>
CONCISELY SET FORTH FACTS SHOWING PROBABLE CAUSE FOR EACH ELEMENT OF THE OFFENSE AND THAT THE SUSPECT COMMITTED THE OFFENSE. IF NOT PROVIDED, THE SUSPECT WILL BE AUTOMATICALLY RELEASED. INDICATE ANY WEAPONS INVOLVED. (DRUG CRIME CERTIFICATE BELOW.)

FILED

18 APR 19 PM 2:26

KING COUNTY  
SUPERIOR COURT CLERK  
E-FILED  
CASE NUMBER: 18-1-01217-8 KNT

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

THE STATE OF WASHINGTON,	)	
	)	
	)	Plaintiff,
	)	
v.	)	No. 18-1-01217-8 KNT
	)	
JULIAN T PIMENTEL,	)	
	)	
	)	Defendant.
	)	
	)	MOTION, FINDING OF PROBABLE
	)	CAUSE AND ORDER DIRECTING
	)	ISSUANCE OF SUMMONS OR
	)	WARRANT AND FIXING BAIL

The plaintiff, having informed the court that it is filing herein an Information charging the defendant with the crime(s) of **Assault In The Second Degree**, now moves the court pursuant to CrR 2.2(a) for a determination of probable cause and an order directing the issuance of a summons or warrant for the arrest of the defendant, and

fixing the bail of the defendant in the amount of \$50,000.00, cash or approved surety bond; and no contact direct or indirect with A.R.W. (██████████). The no contact order issued at the time of first appearance remains in effect until arraignment. The Order to Surrender Weapons issued at the time of first appearance remains in effect until arraignment.

directing the issuance of a summons; and no contact direct or indirect with . The no contact order issued at the time of first appearance remains in effect until arraignment.

In connection with this motion, the plaintiff offers the following incorporated materials: The Federal Way Police Department certification or affidavit for determination of probable cause; the Federal Way Police Department suspect identification data; and the prosecutor's summary in support of order directing issuance of summons or order fixing bail and/or conditions of release.

MOTION, FINDING OF PROBABLE CAUSE AND ORDER DIRECTING ISSUANCE OF SUMMONS OR WARRANT AND FIXING BAIL - 1

Daniel T. Satterberg, Prosecuting Attorney  
CRIMINAL DIVISION  
Maleng Regional Justice Center  
401 4th Avenue North, Suite 2A  
Kent, WA 98032-4429  
(206) 477-3757 FAX (206) 205-7475

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

If the defendant is not in custody, the plaintiff has attempted to ascertain the defendant's current address by searching the District Court Information System database, the driver's license and identicard database maintained by the Department of Licensing, and the database maintained by the Department of Corrections listing persons incarcerated and under supervision.

DANIEL T. SATTERBERG, Prosecuting Attorney

By:



Nicole L. Weston, WSBA #34071  
Senior Deputy Prosecuting Attorney

FINDING OF PROBABLE CAUSE AND ORDER FOR ARREST WARRANT

The court finds that probable cause exists to believe that the above-named defendant committed an offense or offenses charged in the information herein based upon the police agency certification/affidavit of probable cause incorporated and pursuant to CrR 2.2(a).

IT IS ORDERED that the Clerk of this Court issue a summons or warrant of arrest for the above-named defendant; and

IT IS FURTHER ORDERED that

the bail of the defendant be fixed in the amount of \$50,000.00, cash or approved surety bond; and defendant shall have no contact direct or indirect with A.R.W. (██████). The no contact order issued at the time of first appearance remains in effect until arraignment. The Order to Surrender Weapons issued at the time of first appearance remains in effect until arraignment.

a summons shall be issued; if the defendant is incarcerated on the investigation charge herein the defendant shall be released from custody; and shall have no contact direct or indirect with . The no contact order issued at the time of first appearance remains in effect until arraignment.

Additional Conditions: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

MOTION, FINDING OF PROBABLE CAUSE AND ORDER DIRECTING ISSUANCE OF SUMMONS OR WARRANT AND FIXING BAIL - 2

Daniel T. Satterberg, Prosecuting Attorney  
CRIMINAL DIVISION  
Maleng Regional Justice Center  
401 4th Avenue North, Suite 2A  
Kent, WA 98032-4429  
(206) 477-3757 FAX (206) 205-7475

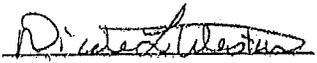
1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

IT IS FURTHER ORDERED that the defendant be advised of the amount of bail fixed by the court and/or conditions of his or her release, and of his or her right to request a bail reduction. Service of the warrant by telegraph or teletype is authorized.

SIGNED this \_\_\_\_\_ day of April, 2018.

\_\_\_\_\_  
JUDGE

Presented by:



Nicole L. Weston, WSBA #34071  
Senior Deputy Prosecuting Attorney

MOTION, FINDING OF PROBABLE CAUSE AND  
ORDER DIRECTING ISSUANCE OF SUMMONS OR  
WARRANT AND FIXING BAIL - 3

Daniel T. Satterberg, Prosecuting Attorney  
CRIMINAL DIVISION  
Maleng Regional Justice Center  
401 4th Avenue North, Suite 2A  
Kent, WA 98032-4429  
(206) 477-3757 FAX (206) 205-7475

King County Superior Court  
Judicial Electronic Signature Page

Case Number: 18-1-01217-8  
Case Title: The State of Washington vs Julian T Pimentel

Document Title: PROPOSED ORDER/FINDINGS

Signed by: james cayce  
Date: 4/19/2018 2:26:00 PM

digitally signed by J. Cayce

Judge/Commissioner: james cayce

This document is signed in accordance with the provisions in GR 30.

Certificate Hash: 1E7BB8AA0B606C74DA41E1FFF52F530BEFD7C69D

Certificate effective date: 7/29/2013 12:54:03 PM

Certificate expiry date: 7/29/2018 12:54:03 PM

Certificate Issued by: C=US, E=kcsceffiling@kingcounty.gov, OU=KCDJA,  
O=KCDJA, CN="James  
Cayce:oDqd0Hr44hGVT9k5YYhwmw=="

Page 4 of 4

FILED  
18 APR 20 AM 10:56

KING COUNTY  
SUPERIOR COURT CLERK  
E-FILED  
CASE NUMBER: 18-1-01217-8 KNT

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

IN THE SUPERIOR COURT OF WASHINGTON  
FOR KING COUNTY

STATE OF WASHINGTON,  
  
Plaintiff,  
  
v.  
  
JULIAN PIMENTEL,  
  
Defendant.

NO. 18-1-01217-8 KNT  
  
NOTICE OF APPEARANCE AND  
REQUEST FOR DISCOVERY

TO: Clerk of Court; and  
  
TO: King County Prosecuting Attorney

YOU AND EACH OF YOU WILL PLEASE TAKE NOTICE that David Allen and Danielle Smith of Allen, Hansen, Maybrown & Offenbecher, P.S., hereby appear as counsel in the above-entitled cause on behalf of defendant and requests that all further papers and pleadings herein, except original process, be served upon the undersigned attorneys at the address below stated.

PURSUANT TO CrR 4.7, YOU ARE REQUESTED to provide all discovery materials to defense counsel at the addresses shown below. As required by CrR 4.7(a)(3), *Brady v. Maryland*, 373 U.S. 83 (1963), *U.S. v. Bagley*, 473 U.S. 667 (1985), *U.S. v. Agurs*, 427 U.S. 97 (1976) and *Kyles v. Whitley*, 514 U.S. 419 (1995), all material which is exculpatory, which tends to negate defendant's guilt or which will assist the defense in any way, such as in cross-examining or impeaching state's witnesses, must also be provided. Pursuant to *Kyles*, the State is obliged to discover the existence of all material or favorable evidence requested above that may be known to any law enforcement agency that is involved in this case or that has past dealings with any witnesses in this case.

YOU ARE FURTHER REQUESTED to preserve all physical evidence relating to the alleged offense and the scene of the alleged crime, and the defendant's arrest and detention, including, but not limited to, police communications, 911 recordings, and video recordings, until final disposition of this cause or until further order of this Court. Request is made pursuant to *State v. Boyd*, 29 Wn.App. 584 (1981) and *U.S. v. Agurs*, 427 U.S. 97, 49 L.Ed.2d 342 (1976).

NOTICE OF APPEARANCE AND REQUEST FOR DISCOVERY - I

Allen, Hansen, Maybrown &  
Offenbecher, P.S.  
600 University Street, Suite 3020  
Seattle, Washington 98101  
(206) 447-9681

1 This request includes, but is not limited to, all police video recordings, including on-board police  
2 car video, and detention cell video.

3 YOU ARE FURTHER REQUESTED, pursuant to CrR 4.7, the United States  
4 Constitution, Amendments 4, 5, 6 & 14, the Washington Constitution, Article I, Section 22, to  
5 disclose the following material and information within the knowledge, possession or control of  
6 the State, its agents and subordinates, or law enforcement agencies, which by the exercise of due  
7 diligence might become known to them, so that the defendant might inspect, copy, photograph or  
8 test same;

9 1. The name, date of birth, aliases, addresses, telephone numbers, and prior counties of  
10 residence, of all persons the State intends to call as witnesses at any hearing or trial,  
11 together with a copy of all written or recorded statements of such persons and the  
12 substance of any and all oral statements of such persons and the names, addresses, and  
13 telephone numbers of persons present when such statements were made. You are further  
14 requested not to assume that any summary that already exists reflects all significant  
15 aspects of any statement and to, instead, verify the substance of any statement with the  
16 relevant witness.

17 2. Any and all documents, statements, reports or other information for each State's witness  
18 regarding:

19 a. Any prior criminal convictions and/or arrests, whether in this State or any other,  
20 and any evidence that the witness has committed or is suspected of committing a  
21 crime, regardless of conviction.

22 b. Any payments made to the witness and the dates of such payments, whether in  
23 connection with this case or any other case, state or federal.

24 c. Any implicit or explicit promises of benefit which have been made by any  
25 government agent or agency, state or federal, to the witness.

26 d. Any actual or implied threats of investigation or prosecution (including  
deportation or exclusion) made to any such witness.

e. Any payments, promises, benefits or threats (as outlined in subsections (b)  
through (d) above) made to the witness's family members or close associates.

f. All known occasions on which the witness has made false statements to any  
person, specifically including, but not limited to, any aliases which the witness  
may have used.

g. All conduct or statements of the witness, whether or not in his role as a witness,  
that reflect a lack of candor, truthfulness, or law-abiding character. This request  
includes any drug use, fraud, or other uncharged criminal conduct.

Allen, Hansen, Maybrow &  
Offenbecher, P.S.  
600 University Street, Suite 3020  
Seattle, Washington 98101  
(206) 447-9681

NOTICE OF APPEARANCE AND REQUEST FOR DISCOVERY -- 2

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

- h. Any false identification document which has ever been in the possession of and/or used by the witness, and each and every occasion on which the witness is known to have used said document.
  - i. Showing bias against the defendant, or a motive to falsify or distort testimony.
  - j. Any prospective witness' ability to perceive, remember, communicate, or tell the truth is impaired; or that a witness has ever used narcotics or other controlled substance, or has ever been an alcoholic or has ever been diagnosed with a mental disorder that can affect accurate perception.
  - k. The case number and name of all court proceedings at which the witness has testified concerning his own criminal activity, payments or rewards provided to him by the State or any governmental agency, or activities as an informant.
  - l. If given a polygraph exam, the results of any polygraph examination performed on the witness and any information concerning the witness's failure to submit to a polygraph examination.
  - m. Any other information that adversely reflects on the credibility of the witness.
3. All written or recorded statements and the substance of all oral statements made by the defendant or co-defendant, and the names, addresses and telephone numbers of any persons present when such statements were made. You are further requested not to assume that any summary that already exists reflects all significant aspects of any statement and to, instead, verify the substance of any statement with the relevant witness.
4. The names, addresses, and telephone numbers of all persons who have information concerning the alleged offense, the nature of the information they possess, regardless of whether the State intends to call them as a witness. This request includes but is not limited to the names of any "domestic violence advocates" who may possess information concerning the alleged offense.
5. Any books, papers, documents, video and/or audio recordings, photographs, or other tangible objects which the State intends to use at the hearing or trial, or which are related to this prosecution.
6. To disclose whether the State will rely upon prior acts, statements, or convictions of the defendant to show motive, opportunity, intent, preparation, plan, knowledge, identity, or absence of mistake or accident, together with a statement of the information to be relied upon and its purpose.
7. Any and all information and records concerning prior criminal convictions of the defendant, co-defendant, and persons who the State intends to call as witnesses at the hearing or trial, whether from this State or any other. This request includes the Federal

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

Bureau of Investigation's record of arrest and dispositions and the National Crime Information Center entries for arrests and dispositions.

8. Any and all electronic surveillance of the defendant's premises or conversations to which the defendant or any witness was a part and any record thereof.

9. To indicate the relationship, if any, of the State's witnesses to the prosecuting authority.

10. Any and all information or material which may tend to exculpate the defendant or which tends to negate defendant's guilt as to the offense charged, including any exculpatory witness statement, including negative exculpatory statements, i.e., statements by informed witnesses that fail to mention the defendant.

11. The names and addresses of any and all expert witnesses the State intends to call at the hearing or trial together with a summary of their testimony, the nature of the opinion and their qualifications, background, education, training and the treatises or texts they rely upon.

12. Any and all reports, statements, draft reports, notes, test results, test procedures or other work product of experts, made in connection with this case, including but not limited to, the results of physical or mental examinations and scientific tests, experiments or comparisons, bench notes, graphs, charts preliminary results, drafts, computer records or notes, and all communications between the requesting party and the agency performing the analysis.

13. Any and all reports made by agents of the state pertaining to the investigation of this case, including, but not limited to, arrest reports, police reports, "use-of-force" statements and follow-up reports, and internal investigation statements or interviews.

14. To disclose any and all information regarding pre-trial identification procedures employed in this case, including, but not limited to, the following:

- a. The time, date location and type of identification procedure employed.
- b. The names and addresses of all persons present at the identification and any statements made in regard to the offense or identification.
- c. Whether an identification was made; the name and address of person identified; the name and address of the person making the identification together with any and all statements made pertinent to the identification or the offense.
- d. Any and all photographic, photostatic, or computer-generated depictions of the montage, line-up, show-up, or other identification procedure employed.

15. To disclose any and all information and material regarding any search and/or seizure relating to this case; the time, date, location, and name of individual or place searched and material sought to be seized; together with the names and addresses of persons present or who have information regarding the search or seizure and any statements they have made.

*NOTICE OF APPEARANCE AND REQUEST FOR DISCOVERY - 4*

Allen, Hanson, Maybrown &  
Offenbecher, P.S.  
600 University Street, Suite 3020  
Seattle, Washington 98101  
(206) 447-9681

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

- 16. The time, date and location of the defendant's arrest; together with the names and addresses of persons who were present and/or arrested the defendant and any and all statements or reports made with respect to the arrest of the defendant. If the defendant was arrested on the authority of a warrant, the affidavit in support of the warrant, the warrant itself, and the return. This request applies even if the warrant which resulted in defendant's arrest was for another unrelated case or a bench warrant.
- 17. All radio logs, dispatch recordings, police vehicle recordings, detention facility recordings, and any other audio or visual recordings that relate to the circumstances surrounding the arrest, detention or any questioning of the defendant.
- 18. All repair logs, maintenance logs, operations manuals, protocols, and other documents or computer records relating to instruments and techniques used to conduct forensic analysis in this case.
- 19. Any law enforcement daily bulletins concerning the defendant.

YOU ARE FURTHER REQUESTED to provide notice of the defendant's criminal history (RCW 9.94A.030(11)) and the aggravating factors (RCW 9.94A.535) upon which the State will rely.

- 1. With respect to criminal history, the crime or crimes (with specific statutes violated for out-of-state convictions), the date of conviction, the date of release from custody, the state and county of conviction, and the cause number.
- 2. If the State intends to argue or present evidence of aggravating circumstances to justify a departure from the guidelines pursuant to RCW 9.9A.535, the specific evidence the State intends to present to the Court on that issue.
- 3. Real facts upon which the State intends to rely. RCW 9.94A.530.

DATED this 20<sup>th</sup> day of April, 2018.

  
 \_\_\_\_\_  
 DAVID ALLEN, WSBA #500  
 Attorney for Defendant

  
 \_\_\_\_\_  
 DANIELLE SMITH, WSBA #49165  
 Attorney for Defendant

Bond Posted 4/19/18

FILED  
APR 20 PM 2:14  
KING COUNTY  
SUPERIOR COURT CLERK  
KENT, WA

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

THE STATE OF WASHINGTON,  
Plaintiff,  
v.  
JULIAN T PIMENTEL  
Defendant.

No. 18-1-01217-8 KNT  
ARREST WARRANT

To Any Peace Officer In The State Of Washington:

An information has been filed in the above entitled Court, charging JULIAN T PIMENTEL with the crime(s) of Assault In The Second Degree, RCW(s) 9A.36.021(1)(e), and the Court having determined that there is probable cause for the issuance of a warrant,

You are therefore commanded to forthwith arrest the said JULIAN T PIMENTEL and keep him/her in custody until he/she is discharged according to law, and make due return of this writ with your manner of service endorsed thereon. Service of this warrant by telegraph or teletype is authorized.

Bail fixed in the sum of \$50,000.00 Cash or Surety Bond. Cash or Surety Bond to be approved by the Court.

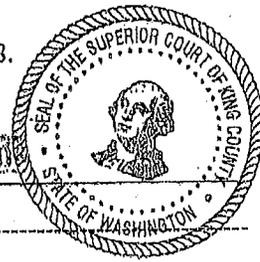
Arrest Warrant - CrR 2.2(e), RCW 10.31.060  
The court has ordered the issuance of this warrant.

Witness my hand and Seal this APR 19 2018 day of April, 2018.

BARBARA MINER, Clerk of Superior Court

By [Signature]  
Deputy Clerk

RUTH RO. PERALTA-CLARK



The above warrant was served on \_\_\_\_\_ by \_\_\_\_\_ Agency

Fees: Service, \_\_\_\_\_  
Mileage, \_\_\_\_\_  
Keeping, \_\_\_\_\_  
Total \_\_\_\_\_

Return the Arrest Warrant (Cr.R 2.2(e))

AGENCY: <b>Federal Way PD</b>	WA0173600	CASE NUMBER <b>180003699</b>	FILE NUMBER	PCN NUMBER	<b>SUPERFORM</b>
----------------------------------	-----------	---------------------------------	-------------	------------	------------------

ARREST INFORMATION	DATE & TIME OF VIOLATION <b>2/10/2018 10:30 PM</b>	CRIMINAL TRAFFIC CITATION ATTACHED? <input type="checkbox"/> YES <input type="checkbox"/> NO	ACCOMPLICES
	DATE OF ARREST/TIME <b>4/17/2018 11:40 AM</b>	ARREST LOCATION <b>33325 8 AV S FEDERAL WAY, WA 98003</b>	

SUSPECT INFORMATION		DOB	ALIASES, NICKNAMES
NAME (LAST, FIRST, MIDDLE/II, SR, 1st, 2nd) <b>PIMENTEL, JULIAN T</b>		<b>[REDACTED]</b>	
APR 18 2018			
ARMED/DANGEROUS <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IDENTITY IN COURT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	CITIZENSHIP <b>US</b>	
SEX <b>M</b>	HEIGHT <b>504</b>	WEIGHT <b>110</b>	SKIN TONE
RACE <b>W</b>	EYE <b>GRN</b>	HAIR <b>BRO</b>	SCARS, MARKS, TATTOOS, DEFORMITIES
CCN	PRIOR SA #	APIS #	FBI #
STATE ID #	DRIVER LICENSE #	STATE <b>WA</b>	SSN
LAST KNOWN ADDRESS <b>660 NE STATE HWY 308 POULSBO, WA 98370</b>		EMPLOYER, SCHOOL (ADDRESS, #) UNION NUMBER	
RESIDENCE PHONE		BUSINESS PHONE	OCCUPATION
PERSON TO BE CONTACTED IN CASE OF EMERGENCY		RELATIONSHIP	Address
			PHONE

CHARGE INFORMATION	OFFENSE <input type="checkbox"/> DV <input type="checkbox"/> FUGITIVE <b>F - INDECENT LIBERTIES</b>	ROW / ORD# <b>9A, 44, 100</b>	COURT / CAUSE #	CITATION #
	OFFENSE <input type="checkbox"/> DV <input type="checkbox"/> FUGITIVE	ROW / ORD#	COURT / CAUSE #	CITATION #

WARRANT INFORMATION	WARRANT DATE	WARRANT NUMBER	OFFENSE <b>A2° w/ SM</b>	AMOUNT OF BAIL <b>5000</b>	WARRANT TYPE <b>RE-ARREST</b>
ORIGINATING POLICE AGENCY <b>Federal Way</b>	ISSUING AGENCY <b>Superior</b>	WARRANT RELEASED TO: (SERIAL # / UNIT / DATE / TIME)			

PROPERTY INFORMATION	LIST VALUABLE ITEMS OR PROPERTY LEFT FOR ARRESTEE AT JAIL		
	LIST VALUABLE ITEMS OR PROPERTY ENTERED INTO EVIDENCE (SIMPLE DESCRIPTION, IDENTIFYING MARKS, SERIAL #)		
	LIST ITEMS ENTERED INTO SAFEKEEPING		
TOTAL CASH OF ARRESTEE <b>\$0.00</b>	WAS CASH TAKEN INTO EVIDENCE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	AMOUNT: <b>\$0.00</b>	SIGNATURE OF JAIL STAFF RECEIVING ITEMS / SERIAL #

OFFICER INFORMATION	ARRESTING OFFICER / SERIAL # <b>Adams, Richard 187</b>	TRANSPORTING OFFICER / SERIAL #	SUPERVISOR SIGNATURE / SERIAL #
	BCPERFORM COMPLETED BY (SIGNATURE/SERIAL #) <b>Adams, Richard</b>	CONTACT PERSON FOR ADDITIONAL INFORMATION (NAME/SERIAL#/PHONE)	

COURT INFO	SUPERIOR COURT FILING INFO <input type="checkbox"/> IN CUSTODY <input checked="" type="checkbox"/> LARGE <input type="checkbox"/> OUT ON BOND	DOCKET CAUSE (BY MP OR WRITE) <b>18-1-01217-8</b>	W/C VERT <b>W/C VERT</b>
COURT/DIST. CT.NO.	DIST. CT. BOND \$	SUP. CT. DATE <b>5-3-18</b>	

EXTRADITE	REF ON APPROV'S EXTRADITION <b>NW</b>	SEAKING-LOCAL ONLY WA/CI-STATE WIDE <input type="checkbox"/>	NCIC-WILL EXTRADITE FROM ID & OR ONLY <input type="checkbox"/>	NCIC-WILL EXTRADITE FROM OR, ID, MT, WY, CA, NV, UT, CO, AZ, NM, HI, AK <input type="checkbox"/>	NCIC-WILL EXTRADITE FROM FROM ALL 50 STATES <input type="checkbox"/>
ENTRY	CCN <b>1961757</b>	DOB	TOE	OP	CLERK/STAFF
	WAC	TOE	OP		DOC
	NCIC	OP			TOC
					CP

**STATEMENT OF PROBABLE CAUSE; NON-VUCSA**

CONCISELY SET FORTH FACTS SHOWING PROBABLE CAUSE FOR EACH ELEMENT OF THE OFFENSE AND THAT THE SUSPECT COMMITTED THE OFFENSE. IF NOT PROVIDED, THE SUSPECT WILL BE AUTOMATICALLY RELEASED. INDICATE ANY WEAPONS INVOLVED. (DRUG CRIME CERTIFICATE BELOW.)

**632328**

Ray 07/005 Generated on 4/17/2018 1:53:10 PM ID: 5287812 Page 1 of 6

ANSWER TO WRIT OF PROHIBITION  
APPENDIX 023

Minute No: 7

### CLERK'S MINUTES - Criminal Arraignment Calendar

SCOMIS ARRAIGN HCNTU MTHRG DSMHRG HSTKIC

Judge	BOWMAN, BILL	Date	5/3/2018
Clerk	MOLLY SIMON	DR	GA
DPA	MARLANA KUPER	Start Time	09:26:45
Interpreter		Court Reporter	

#### King County Cause No: 181012178 KNT STATE vs PIMENTEL, JULIAN T

Reason		AKA	PIMENTEL, JULIAN TAYLOR
DPA Unit	SAU	DOB	[REDACTED]
ATD	DANIELLE SMITH DAVID ALLEN	CCN	1961757

Defendant Present	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Custody Status	OUT CUSTDY
Charge(s)	1 Assault In The Secon	Commence Date	5/3/2018
Jail Location	OUT	60 Day Date	07/02/2018
Ball Amount	\$50,000.00	90 Day Date	08/01/2018
Bond Company		Current Ball Type	
		Bond Confirmed	<input type="checkbox"/> Yes <input type="checkbox"/> No

- Defendant is arraigned and enters a plea of NOT GUILTY  Objection Noted  Yes  No
- Case Setting Date 06/05/2018  No Contact Order entered
- Defendant's motion to reduce bond  Denied  Reserved  Granted  PR \$0.00
- On  Basic CCAP  Enhanced CCAP  EHD Enhanced  WER
- State's motion for bench warrant for Defendant  Denied  Granted \$0.00
- Order(s) Signed/Order(s) to be presented
- State's motion to dismiss this cause as to this Defendant  Denied  Granted
- State  Defense motion for Stay of Proceedings, and Continuance to
- [Dropdown menu]

- Agreed Findings of Fact Conclusions of Law and order are signed
- Return Date Is
- Order Sealing document is signed

*Handwritten mark*  
**ISSUED**

**FILED**  
KING COUNTY WASHINGTON  
MAY 03 2018  
SUPERIOR COURT CLERK  
BY MOLLY SIMON  
DEPUTY

Superior Court of Washington for the County of King
State of Washington
Plaintiff
vs.
Jullan T Pimentel
Defendant (First, Middle, Last Name)

No. 18-1-01217-8  
 Pre-Trial  Post Conviction  
**Sexual Assault Protection Order**  
 RCW 7.90.150  
 Clerk's action required

1. Protected Person's Identifiers:

ARW  
 Name (First, Middle, Last)  
 \_\_\_\_\_ F \_\_\_\_\_  
 DOB Gender Race

Defendant's Identifiers:

Date of Birth	
_____	
Gender	Race
M	W

It is Ordered:

2. Defendant:

- A. shall not contact the protected person, directly, indirectly, in-person or through others, by phone, mail, or electronic means, except for mailing or service of process of court documents through a third party, or contact by the defendant's lawyers; and
- B. shall not knowingly enter, remain, or come within 500 ft (1,000 feet if no distance entered) of the protected person's residence, school, workplace, other: person

3.  Defendant: (when protected person is an intimate partner or child of intimate partner or defendant) (RCW 9.41.040):

- A. shall not harass, stalk, or threaten the protected person or engage in other conduct that would place the protected person in reasonable fear of bodily injury to the protected person; and
- B. shall not use, attempt to use, or threaten to use physical force against the protected person that would reasonably be expected to cause bodily injury.

4. This Sexual Assault Protection order expires on: \_\_\_\_\_  
 (Pre-Trial) two years from today if no date is entered.  
 (Post-Conviction) two years following the expiration of any sentence of imprisonment and subsequent period of community supervision, conditional release, probation, or parole.  
 RCW 7.90.150.

**WARNING: VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE UNDER RCW 26.50 AND WILL SUBJECT A VIOLATOR TO ARREST.**  
 You can be arrested even if the person protected by this order invites or allows you to violate the order's prohibitions. You have the sole responsibility to avoid violating the order's provisions. Only the court can change the order. (Additional warnings on page 2 of this order.)

5. Firearms and Weapons, Defendant: (RCW 9.41.800)

Pretrial:

If a "serious" offense as defined in RCW 9.41.010, shall not possess a firearm.

If not a "serious" offense, shall not obtain or possess a firearm and shall surrender any firearm or other dangerous weapon or any concealed pistol license (See findings in paragraph 8 below).

Post Conviction: shall not obtain, own, possess or control a firearm.

Findings of Fact

6. Based upon the record both written and oral at a hearing, the court finds that the defendant has been charged with, arrested for, or convicted of a sex offense as defined in RCW 9.94A.030, a violation of RCW 9.A.44.098, a violation of RCW 9.68A.090, or a gross misdemeanor that is, under RCW 9A.2B, a criminal attempt, criminal solicitation, or criminal conspiracy to commit an offense classified as a sex offense under RCW 9.94A.030.

7. The court further finds that the defendant's relationship to a person protected by this order is an  intimate partner (former/current spouse; parent of common child; former/current dating; or former/current cohabitants) or  child of intimate partner, or  child of defendant, or  other family member as defined by RCW 10.99; \_\_\_\_\_

8.  The court makes the following mandatory findings pursuant to RCW 9.41.800:

The defendant used, displayed, or threatened to use a firearm or other dangerous weapon in a felony.

The defendant is ineligible to possess a firearm due to a prior conviction pursuant to RCW 9.41.040;

or

Possession of a firearm or other dangerous weapon by the defendant presents a serious and imminent threat to public health or safety, or to the health or safety of any individual.

9.  The defendant represents a credible threat to the physical safety of the protected person. (RCW 9.41.040)

**Additional Warnings to Defendant:** This order does not modify or terminate any order entered in any other case. The defendant is still required to comply with other orders. Willful violation of this order is punishable under RCW 26.50.110. State and federal firearm restrictions apply. 18 U.S.C. § 922(g)(8)(9); RCW 9.41.040. Pursuant to 18 U.S.C. § 2285, a court in any of the 50 states, the District of Columbia, Puerto Rico, any United States territory, and any tribal land within the United States shall accord full faith and credit to the order.

Additional Orders

10. The clerk of the court shall forward a copy of this order on or before the next judicial day to the originating police agency: Federal Way Police Department, Police Incident 180003699, where the case is filed, which shall enter it in a computer-based criminal intelligence system available in this state used by law enforcement to list outstanding warrants.

Dated: 5/3/18  in open court with the defendant present

Presented by:

[Signature]

Judge/ Pro Tem/Court Commissioner

I acknowledge receipt of this order.

**BILLA BOWMAN**

Deputy Prosecuting Attorney, WSBA# 34071

[Signature]  
(Signature of Defendant)

DATE: 5/3/18

I am a certified or registered interpreter or found by the court to be qualified to interpret in the \_\_\_\_\_ language, which the defendant understands. I translated this order for the defendant from English into that language. Signed at (city) \_\_\_\_\_, (state) \_\_\_\_\_, on (date) \_\_\_\_\_. Interpreter: \_\_\_\_\_ print name: \_\_\_\_\_

Rev. 8/14

**FILED**  
KING COUNTY WASHINGTON

JAN 11 2019

SUPERIOR COURT CLERK  
BY Theresa Sorenson  
DEPUTY

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

STATE OF WASHINGTON,

Plaintiff,

No. 18-1-01217-8 KNT

vs.

JULIAN T PIMENTEL,

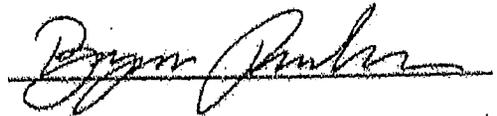
Defendant.

MOTION, CERTIFICATION AND  
ORDER OF DISMISSAL  
[Clerk's Action Required]

COMES NOW Daniel T. Satterberg, Prosecuting Attorney for King County, Washington, by and through his deputy, and moves the court for an order dismissing the above-entitled cause as to the above defendant for the reasons as set forth in the certification of the undersigned deputy prosecuting attorney.

That Brynn N. H. Jacobson is a Deputy Prosecuting Attorney in and for King County, Washington, and am familiar with the records and files herein. This case should be dismissed for the following reasons: In the interests of justice and based upon information not available at the time of filing.

Under penalty of perjury under the laws of the State of Washington, I certify that the foregoing is true and correct. Signed and dated by me this 11<sup>th</sup> day of January, 2019, at Kent, Washington.



Brynn N. H. Jacobson  
WSBA# 47820  
Deputy Prosecuting Attorney  
Daniel T. Satterberg, Prosecuting Attorney  
Criminal Division  
Maleng Regional Justice Center  
401 4th Avenue North, Suite 2A  
Kent, WA 98032-4429  
(206) 477-3757 FAX (206) 205-7475

MOTION, CERTIFICATION AND ORDER OF  
DISMISSAL - 1

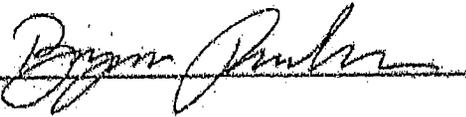
1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

ORDER

IT APPEARING from the motion and certification that the ends of justice do not warrant further proceedings in this matter; now, therefore  
IT IS HEREBY ORDERED, ADJUDGED and DECREED that the above-entitled cause as to the above named defendant be, and the same hereby is, dismissed.  
DONE IN OPEN COURT this 11<sup>th</sup> day of January, 2019.

  
\_\_\_\_\_  
JUDGE Chad Allred

Presented by:

  
\_\_\_\_\_

Brynn N. H. Jacobson  
WSBA# 47820  
Deputy Prosecuting Attorney

MOTION, CERTIFICATION AND ORDER OF  
DISMISSAL - 2

Daniel T. Sutterberg, Prosecuting Attorney  
Criminal Division  
Malong Regional Justice Center  
401 4th Avenue North, Suite 2A  
Kent, WA 98032-4429  
(206) 477-3757 FAX (206) 205-7475

**KING COUNTY PROSECUTING ATTORNEYS OFFICE CIVIL DIVISION**

**March 09, 2020 - 12:05 PM**

**Transmittal Information**

**Filed with Court:** Supreme Court  
**Appellate Court Case Number:** 98154-0  
**Appellate Court Case Title:** Julian Pimentel v. The Judges of King County Superior Court et al.

**The following documents have been uploaded:**

- 981540\_Answer\_Reply\_20200309120357SC722039\_9709.pdf  
This File Contains:  
Answer/Reply - Other  
*The Original File Name was 03-03-20 Answer to Writ.pdf*

**A copy of the uploaded files will be sent to:**

- cooper@ahmlawyers.com
- danielle@ahmlawyers.com
- david@ahmlawyers.com
- sarah@ahmlawyers.com
- todd@ahmlawyers.com

**Comments:**

Respondents' Answer to Writ of Prohibition

---

Sender Name: Jennifer Revak - Email: jrevak@kingcounty.gov

**Filing on Behalf of:** Ann Marie Summers - Email: ann.summers@kingcounty.gov (Alternate Email: )

Address:  
516 3rd avenue Room W-400  
Seattle, WA, 98104  
Phone: (206) 477-1120

**Note: The Filing Id is 20200309120357SC722039**