

FILED
SUPREME COURT
STATE OF WASHINGTON
1/29/2019 2:43 PM
BY SUSAN L. CARLSON
CLERK

SUPREME COURT NO. 96608-7
Appellate Court Case # 76624-4-I

STATE OF WASHINGTON
SUPREME COURT

HUY YING CHEN and YUEH HUA CHEN, Husband and Wife,
Appellant,

v.

JP Morgan Chase Bank, AS TRUSTEE F/K/A THE CHASE MANHATTAN BANK
SUCCESSOR IN INTEREST TO THE CHASE MANHATTAN BANK N.A; and
its successor name as THE BANK OF NEW YORK MELLON TRUST COMPANY,
N.A. F/K/A THE BANK OF NEW YORK TRUST COMPANY, N.A. AS
SUCCESSOR TO JPMORGAN CHASE BANK, N.A. AS TRUSTEE FOR
RESIDENTIAL ASSET MORTGAGE PRODUCTS, INC., MORTGAGE ASSET-
BACKED PASS-THROUGH CERTIFICATES SERIES 2005-RP3

Respondents

PETITIONER MOTION TO DISQUALIFY RESPONDENT COUNSEL AND STRIKE
RESPONDENTS COUNSELS' ANSWER TO PETITIONER DISCRETIONARY REVIEW

PRO SE for Petitioner
CHEN HUY YING
5112 189th Ave N.E
Sammamish, WA 98074
Phone:(206) 779-8880
Email: hy@nobo.us

1. Identity of Moving Party and Relief Sought:

COMES NOW Defendants/Petitioner, Huy Ying Chen & Yueh Hua Chen (deceased), (hereinafter referred to as "CHEN") through Pro Se, hereby files Motion to Disqualify Plaintiff Attorney Cody M. Weston ("Attorney Weston") and Law firm PERKINS COIE LLP ("Perkin LLP") from acting as Appeal Counsel for Respondent / Judgment creditor in Sheriff Sale for "THE BANK OF NEW YORK MELLON TRUST COMPANY, N.A. AS TRUSTEE F/K/A THE CHASE MANHATTAN BANK SUCCESSOR IN INTEREST TO THE CHASE MANHATTAN BANK N.A." AS TRUSTEE FOR RESIDENTIAL ASSET MORTGAGE PRODUCTS, INC., MORTGAGE ASSET-BACKED PASS-THROUGH CERTIFICATES SERIES 2005-RP3. ("Mellon Trustee") in this matter. Mellon Trustee claimed it is a successor of JPMORGAN CHASE BANK, AS TRUSTEE F/K/A THE CHASE MANHATTAN BANK SUCCESSOR IN INTEREST TO THE CHASE MANHATTAN BANK N.A." ("Chase Trustee"). Though the fact of this matter is both Chase Trustee and Mellon Trustee are fictitious entities as detail below.

Furthermore, petitioner also seeks an order striking the Respondents' Answer to Petition for Review filed by Respondents joint Counsel of Attorney Weston and Attorney Joshua S. Schaer ("Attorney Schaer") on January 09, 2019. Attorney Schaer have filed his withdraw on January 14, 2019 (Appendix I) which only remaining Counsel of Attorney Weston on this case.

When attorneys' file papers or answer in court, under Washington law they are required to tell the complete truth whether or not the paperwork is or was filed under penalty of perjury. Under

Washington law, telling only part of the truth in any Court filing by an attorney is the same as telling a lie, and withholding, concealing, or omitting relevant information in Court filings proceeding is the same as telling a lie. It is considered fraud on the court, according to the Washington State Bar RPC 8.1 (a) knowing make a false statement or material fact and RPC 8.4 (c) misconduct-engage in conduct involving dishonesty, fraud, deceit or misrepresentation.

2. Record Relevant to Motion:

2.1 On January 14, 2019, Attorney Schaer filed a Notice of Withdrawal and the remaining Counsel of Attorney Weston on behalf of Mellon Trustee. With this case Attorney Weston have not filed his Notice of Appearance for his representation for Mellon Trustee. Although Attorney Schaer file his Notice of Appearance at 08-22-2017 for Mellon Trustee, he also filed his Notice of intend to withdrawal at November 20, 2017 in Court of Appellate and January 13,2019 to Supreme Court which withdrawal him completely out of this case. At this point Attorney Schaer no longer represents Mellon Trustee and with the remaining counsel Attorney Weston should file his notice of appearance in representation for Mellon Trustee and Chase Trustee but did not and have not. Furthermore, it is almost impossible for Attorney Weston because not only Chase Trustee is fictitious entity but its successor is fictitious entity as well.

2.2 It is clear through with evidence and declarations that the Petitioner presented, not only hired private investigator B.P to check both of Plaintiffs' legal position (see Appendix II) and Petitioner also checked personally for JP Morgan Bank directly (not Chase Trustee) and SEC

(Securities & Exchange Commissioner) with search result that no such entities (Exhibit B-Chen Declaration). The bottom line that no such entities existent at all in Washington State or in USA. The Plaintiff Counsels know they made a lie to Court for their representation of fictitious entities and Attorney Schaer choose to withdrawal and Attorney Weston not willing to file under perjury the declaration for his Notice of Appearance.

2.3 The matter of fact both of Chase Trustee and Mellon Trustee are fictitious entities are not real legal entities. Of course, Plaintiff Counsel may continue to contend under not conclusory nature of assertion for their client are not fictitious entities but in the meantime the counsels continue to file their notice of withdrawal from this case and continue to refuse to take perjury oath to prove their clients real position. The truth of the matter is they know better than anyone that fictitious entities do not have authorities to do anything such as and including Sheriff sale or be grant for order of confirmation of sale. The remaining Counsel Attorney Weston cannot overcome the issues and file his Notice of Appearance under his perjury oath.

3. Grounds for Relief and Argument:

3.1 Whether plaintiff Counsel are under oath or not, attorneys are required by state law to tell the truth in court:

On January 13, 2019, Attorney Schaer filed a Notice of Withdrawal and Remanding only Counsel of Attorney Weston on behalf of Mellon Trustee. Procedurally Attorney Weston may need and should file Notice of appearance with his perjury oath declaration again for both

of Chase Trustee or Mellon Trustee otherwise will be lie because fiticious entities cannot authorize any jobs to Plaintiffs Counsel. It is obviously Plaintiffs' Counsel dishonest and lie to represented to others unknown parities to file this sheriff foreclosure sale which may serious damage CHEN and family.

3.2 Plaintiff Counsel withholding or concealing facts during a Court proceeding or in papers file with the court for judgment creditors' legal standing are the same as telling a lie which constitutes fraud upon the court:

"A crucial element in any mortgage foreclosure proceeding is that the parties seeking foreclosure must demonstrate that it has standing to foreclose." *See McLean v. JP Morgan Chase Bank Nat. Assoc.*, 79 So.3d 170, 173 (Fla. 4th DCA 2012); *Hunter v. Aurora Loan Services, LLC*, 137 So.3d 570, 573. This case that Respondents/judgment creditors without possession any endorsed note should not be sufficient to establish their standing as a "holder" of the note. As well as within the original note, no endorsement that the Bank allow had the right to enforce the note when it filed suit, because the none endorsement. Eventually for their first assignment from Washington Mutual bank to Chase Trustee had been lost its standing because Chase trustee was a fictitious entity. At this circumstance Plaintiff Counsel made lie to misleading the Court and answer petitioner discretion review should be stricken with lack of standing.

Apparently even with Plaintiff Counsel dishonest and canceling with constitute fraud should disqualify an attorney from representation of fictitious entity regardless of whether an actual lack of standing. *See, Kurbitz v. Kurbitz*, 77 Wn.2d 943, 947, 468 p.2d 673 (1970). Here,

there is both an actual and apparent The Court should enter an order disqualifying Attorney Weston from acting as Counsel for both of Chase Trustee or Mellon Trustee that all are fictitious entities, is also not qualified to act as counsel for fictitious Plaintiff Counsel and their Answer filed on January 7,2019, should be stricken.

Respectfully submitted this 29th day of January 2019.

A handwritten signature in blue ink, appearing to read 'Chen Huy Ying', is written over a horizontal line.

By: CHEN HUY YING as Pro Se
Dated: January 29, 2019
At: Sammamish, Washington

SUPREME COURT NO. 76608-7

Appellate Court Case # 76624-4-I

STATE OF WASHINGTON

SUPREME COURT

HUY YING CHEN and YUEH HUA CHEN, Husband and Wife,
Appellant,

v.

JP Morgan Chase Bank, AS TRUSTEE F/K/A THE CHASE MANHATTAN BANK
SUCCESSOR IN INTEREST TO THE CHASE MANHATTAN BANK N.A.; AS TRUSTEE
FOR RESIDENTIAL ASSET MORTGAGE PRODUCTS, INC., MORTGAGE ASSET-
BACKED PASS-THROUGH CERTIFICATES SERIES 2005-RP3.

Respondents

DECLARATON OF CHEN HUY YING IN SUPPORT OF PETITIONER MOTION TO
DISQUALIFY RESPONDENT COUNSEL AND STRIKE RESPONDENTS COUNSELS'
ANSWER TO PETITIONER DISCRETIONARY REVIEW

**PRO SE for Petitioner
CHEN HUY YING
5112 189th Ave N.E
Sammamish, WA 98074
Phone:(206) 779-8880
Email: hy@nobo.us**

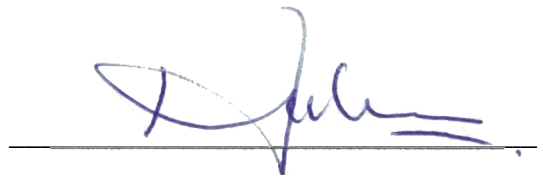
HUY YING CHEN declares as follows:

1. I am one of petitioner and I am over the age of eighteen. I am competent to make this declaration, and I make this declaration based on my personal knowledge.
2. On date of August 1,2017, I hired BP investigative Agency (BPIA), a limited liability company organized under the laws of Montana for conducting securitization audits for its patrons and Analysis of subject Chain of Title. This expert report said “JP MORGAN CHASE BANK, AS TRUSTEE F/K/A THE CHASE MANHATTAN BANK SUCCESSOR IN INTEREST TO THE CHASE MANHATTAN BANK N.A” are redacted out fictitiously. There is no name given of a trust to which the Assignee is acting as trustee never been a legal existing in any place at Unite State, this is a fictitious entity. According BPIA report that during 05/01/2012 and Executed: 04/10/2012, For a Assignor: JPMorgan Chase Bank, N.A. f.k.a JPMorgan Chase Bank as Trustee assigned to Assignee of The Bank of New York Mellon Trust Company, N.A. f.k.a The Bank of New York Trust Company, N.A. as successor in interest to JPMorgan Chase Bank, N.A. as Trustee Pooling & Servicing Agreement dated as of November 1, 2005 Mortgage Asset-Backed Pass-Through Certificates, Series 2005-RP3. These assignments are also deceptive and fictitious because no such name been legal existed.
3. I also personally called JP Morgan Chase Bank head office in New York to confirm their Trustee of JPMORGAN CHASE BANK, AS TRUSTEE F/K/A THE CHASE MANHATTAN BANK SUCCESSOR IN INTEREST TO THE CHASE MANHATTAN BANK N.A”. Their legal department said they DO NOT own that Trust and cannot be a Trustee for that name and refused to provide any further information for me. I also double check personally for that loan within this trust using mortgage backed

securities data (“MBS Data”) and no loan matching the subject loan appeared within the current or past under name of THE BANK OF NEW YORK MELLON TRUST COMPANY, N.A. FKA THE BANK OF NEW YORK TRUST COMPANY, N.A. AS SUCCESSOR TO JPMORGAN CHASE BANK, N.A. AS TRUSTEE FOR RESIDENTIAL ASSET MORTGAGE PRODUCTS, INC., MORTGAGE ASSET-BACKED PASS-THROUGH CERTIFICATES SERIES 2005-RP3. Which confirms exactly accurate following BAIP report for a fictitious entities and deceptive for a broken chain of title.

4. The original summary judgment of JP MORGAN CHASE BANK, AS TRUSTEE F/K/A THE CHASE MANHATTAN BANK SUCCESSOR IN INTEREST TO THE CHASE MANHATTAN BANK N.A be docketed in Bankruptcy Court which issued at October 18, 2007 and entered at November 29, 2007 but judgment have been expired for 10 years with no any judgment creditor renew.

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



By: **HUY YING CHEN**
Dated: January 29, 2019
At: Sammamish, Washington

Appendix I

Plaintiff Counsel withdraw from Case

FILED
SUPREME COURT
STATE OF WASHINGTON
1/14/2019 2:18 PM
BY SUSAN L. CARLSON
CLERK

Supreme Court No. 96608-7

Court of Appeals No. 76624-4-I

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

HUY YING CHEN and YUEH HUA CHEN, Husband and Wife,

Appellants,

v.

JPMORGAN CHASE BANK, AS TRUSTEE F/K/A THE CHASE
MANHATTAN BANK SUCCESSOR IN INTEREST TO THE CHASE
MANHATTAN BANK, N.A.,

Respondent

NOTICE OF ATTORNEY'S WITHDRAWAL

Submitted By:
Joshua S. Schaer, WSBA No. 31491
PERKINS COIE LLP
10885 N.E. 4th St., Ste. 700
Bellevue, WA 98004
jschaer@perkinscoie.com

PLEASE TAKE NOTICE that Joshua S. Schaer of Perkins Coie LLP hereby withdraws as counsel herein for Respondent The Bank of New York Mellon Trust Company, National Association fka The Bank of New York Trust Company, N.A. as successor to JPMorgan Chase Bank, N.A. as Trustee for Residential Asset Mortgage Products, Inc., Mortgage Asset-Backed Pass-Through Certificates Series 2005-RP3. Cody M. Weston remains as counsel of record for Respondent.

RESPECTFULLY SUBMITTED this 11th day of January, 2019.

PERKINS COIE LLP

By: /s/ Joshua S. Schaer
Joshua S. Schaer, WSBA No. 31491

Withdrawing Attorney for Respondent

By: /s/ Cody M. Weston
Cody M. Weston, WSBA No. 52321

Remaining Attorney for Respondent The Bank of New York Mellon Trust Company, National Association fka The Bank of New York Trust Company, N.A. as successor to JPMorgan Chase Bank, N.A. as Trustee for Residential Asset Mortgage Products, Inc., Mortgage Asset-Backed Pass-Through Certificates Series 2005-RP3

CERTIFICATE OF SERVICE

I, June Starr, certify that on January 14, 2019, a copy of the above
NOTICE OF ATTORNEY'S WITHDRAWAL was served by U.S.
mail on the following parties and counsel of record:

Huy Ying Chen
5112 189th Avenue NE
Sammamish, WA 98074
Pro Se Appellant

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

EXECUTED at Seattle, Washington, on January 14, 2019.



June Starr

PERKINS COIE LLP

January 14, 2019 - 2:18 PM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 96608-7
Appellate Court Case Title: JP Morgan Chase Bank v. Huy-Ying Chen, et al.
Superior Court Case Number: 08-2-13281-1

The following documents have been uploaded:

- 966087_Notice_20190114141630SC890647_8761.pdf
This File Contains:
Notice - Intent to Withdraw
The Original File Name was Supreme Court - Chen Notice of Withdrawal.pdf

A copy of the uploaded files will be sent to:

- CWeston@perkinscoie.com
- hy@nobo.us
- jstarr@perkinscoie.com
- kstephan@rcolegal.com

Comments:

Sender Name: Joshua Schaer - Email: jschaer@perkinscoie.com
Address:
10885 NE 4TH ST STE 700
BELLEVUE, WA, 98004-5579
Phone: 425-635-1418

Note: The Filing Id is 20190114141630SC890647

Appendix II

BP Investigation Report

Chain of Title & Securitization Analysis ©

#250

Order Submission: Huy Ying Chen

Client Name *

Order Date * Tuesday, June 27, 2017

Fact Patterns Securitization

Identified: Late or Missing Assignments

Defunct Entities

Other

Trust Name No Actual Trust Name Provided In Assignment

Trust Capture

MBSData Zip File

(Note – This

replaces the

following fields:

Trust Capture,

Remittance

Report, Tranche

Data, Loan Level

Data, & Deal

Snapshot.)

Trust Closing Date

SEC Link – Pooling

& Servicing

Agreement"

SEC Link –
Prospectus

Most Recent Trust
Remittance Report

Deal Snapshot

Loan Level Data

Tranche Data

Assignment(s)



[assignments__chen.pdf](#) 133.02 KB · PDF

County Liens
Report



[county_liens_report__chen.tiff.tif](#) 221.62 KB · TIF

MERS Capture

GSE Capture

Corporate Search
Results (if
available)

Exhibit A



[liens_123__chen.pdf](#) 2.10 MB · PDF

Exhibit B



[ocwen_consent_order_2014__ny.pdf](#) 481.48 KB · PDF

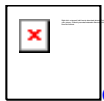
Exhibit C



[cynthia_riley__no_poa_or_corporate_resolution_exists_authorizing_her_stampsignature.png](#)

77.08 KB · PNG

Exhibit D



[qualified_written_request_example__private_mbs_trust21.docx](#) 16.23 KB · DOCX

Exhibit E

Case Narrative Summary:

CONFIDENTIAL

The information contained in this report is intended only for the person or entity to which they are addressed and may contain confidential and/or privileged information. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient may be prohibited by state or federal law. If you received this report in error, please contact BP Investigative Agency @ 406-328-4075, or email info.bpia@gmail.com, and delete the material from any computer or server where electronic information is stored. Thank you.

This Report includes an analysis of legal defects in the chain of title. It also provides an explanation of novel legal defenses. Since foreclosure takes place in judicial and non-judicial jurisdictions in the 50 states and the District of Columbia, enacted and decisional law may be expected to vary. Accordingly, the legal defense must be adapted by the practitioner to conform to local law. The Attachments are included to provide practitioners with additional background information about securitization and mortgage defense.

This Report contains information, opinions, findings and remarks which are unique and proprietary. In addition, this Report was also prepared for the use of BP Investigative Agency, LLC. (BPIA), a limited liability company organized under the laws of Montana, which is conducting securitization audits for its patrons and customers. Accordingly, it is necessary for the continued operation of BPIA's business plan to treat the Report as confidential, and a protective order will be necessary to protect the Report's confidentiality and restrict its distribution, dissemination and publication electronically or in hardcover.

FINDINGS AND OVERALL OPINIONS:

1. Subject loan was originated on or about February 2, 1999 with the named lender "Washington Mutual Bank" (WMB).
2. Two assignments of the DOT have been recorded in the county land records which are deceptive and likely fraudulent. The assignments reflect a fatally defective chain of title for the reasons set forth below.

The sequential order of the assignments are as follows:

Assignment #1 -

Recorded: 03/21/2006

Executed: 02/14/2005

Assignor: Washington Mutual Bank

Assignee: JPMorgan Bank, N.A. as Trustee (Redactions)(appears to be "fka Chase Manhattan Bank as Trustee").

Assignment #2 -

Recorded: 05/01/2012

Executed: 04/10/2012

Assignor: JPMorgan Chase Bank, N.A. fka JPMorgan Chase Bank as Trustee

Assignee: The Bank of New York Mellon Trust Company, N.A. fka The Bank of New York Trust Company, N.A. as successor in interest to JPMorgan Chase Bank, N.A. as Trustee Pooling & Servicing Agreement dated as of November 1, 2005 Mortgage Asset-Backed Pass-Through Certificates, Series 2005-RP3.

These assignments are deceptive, likely fraudulent, and represent fatal defects for the following reasons:

(a.) There is no evidence of MERS involvement. Assignment one is recorded in 2006 long before WMB went into receivership by the FDIC on September 25, 2008. As such, the loan did not go through the FDIC and cannot be claimed as an acquired asset by JPMorgan Chase by virtue of the Purchase & Assumption Agreement (PAA.)

(b.) Assignment #1 names a redacted and incomplete name for the Assignee which is deceptive. The Assignee name is "JPMorgan Chase Bank, N.A. as Trustee" with what appears to be "fka Chase Manhattan Bank as Trustee" redacted out. There is no name given of a trust to which the Assignee is acting as trustee. Thus, this assignment from the originating entity (WMB) is assigned to an undisclosed entity which means it is arguably defective and carries no weight. This means that the loan did not go through the FDIC prior to WMB's demise, and the defective assignment cannot be cured with WMB no longer in existence.

(c.) Assignment #2 is executed by an entity that does not exist, and is deceptive not only for this fact, but also for the

fact that the Assignee Trust is incomplete and fails to identify the parties to the series.

The Assignor "JPMorgan Chase Bank, N.A. fka JPMorgan Chase Bank as Trustee" is a ruse. There is no entity that appears to exist by this name, and the name fails to name the other "fka – Chase Manhattan Bank as Trustee."

The assignment also names a "series 2005–RP3" trust without naming any issuing entity for the series. The assignment was likely prepared by Ocwen Loan Servicing which is evidenced in the upper left corner of the document. These types of deceptive and fraudulent assignments lead to Ocwen's "Consent Judgment" attached above as Exhibit B.

(d.) Assignment #1 is executed by Cynthia Riley as VP of WMB. There is a lot of information regarding Riley and the use of her signature on note endorsements and assignments as an officer of WMB. Attached above in Exhibit C is a statement made by JPMorgan Chase in a Florida case "Waisome" whereby Chase states there is no corporate resolution in its possession showing that Riley had the authority to execute documents as an officer of WMB.

(e.) Assignment #1 has two different loan numbers. The left upper corner has "Loan No. 0019012565" and under the bar code is "Loan#9863313." This is suspicious.

It is my opinion that no assignee has been identified in these assignments, and because the loan was sold to someone by WMB prior to its failure, the loan did not go through the FDIC. This signifies a "Wild Deed" at this point.

3. Review Transfer of Ownership Notices –

Due to assignment occurring in 2012, the following applies:

The Helping Families Save Their Homes Act of 2009 also added a new provision in TILA which requires that whenever ownership of a mortgage loan securing a consumer's principal dwelling is transferred, the creditor that is the new owner or assignee must notify the borrower in writing, within 30 days after the loan is sold or assigned, of the following information:

- the new creditor's identity, address, and telephone number;
- the date of transfer;
- location where the transfer is recorded;
- how the borrower may reach an agent or party with authority to act on behalf of the new creditor; and

- any other relevant information regarding the new owner.

The new law applies to any transfers made after the Act's effective date, which was May 20, 2009. Were any transfer notices provided?

4. Though no issuing entity trust has been identified, the only named trust that possibly fits with the named series "2005-RP3" is a trust associated with Residential Funding Corp (RFC) called "RAAC 2005-RP3." RFC is identified on Assignment #1. I ran a check of the loans within this trust using MBSData and no loan matching the subject loan appeared within the current or past trust data. No additional trusts identified.

5. No copy of the note in its current state has been provided for inspection. Recommendation is to send a QWR Request seeking all sales and transfer dates and the parties to those transactions, as well a request for a copy of the note reflecting all sales through endorsement(s) and/or allonge(s). A sample copy of a QWR request is attached in Exhibit D. Substitute your specific loan information and send certified mail / return receipt.

I will review any responsive documents and add commentary if/when produced.

6. Two subsequent liens have been recorded after the subject loan and are included in Exhibit A above. If subject loan was to have been paid off with these loans, no reconveyances appear to have been recorded per the attached County Liens Report.

CONCLUSION:

As the current chain of title sits, there are no entities that can be positively identified through the assignments other than the named originating "lender - Washington Mutual Bank." WMB is defunct and the loan did not go through the FDIC and was no acquired by JPMorgan Chase as part of the FDIC's Receivership. Thus, the COT appears fatally defective.

July 25, 2017

/S/ Bill Paatalo

Bill Paatalo

Private Investigator - OR PSID# 49411

BP Investigative Agency, LLC

P.O. Box 838

Absarokee, MT 59001

(406) 328-4075

ANDREA CHEN - FILING PRO SE

January 29, 2019 - 2:43 PM

Filing Petition for Review

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: Case Initiation
Appellate Court Case Title: Huy Ying Chen, Appellant v. JP Morgan Chase Bank, Respondent (766244)

The following documents have been uploaded:

- PRV_Petition_for_Review_Plus_20190129144241SC138159_4154.pdf
This File Contains:
Motion 1 - Other
Petition for Review
The Original File Name was 01-29-2019 disqualify counsel and strike answer final.pdf

A copy of the uploaded files will be sent to:

- CWeston@perkinscoie.com
- hy@nobo.us
- jschaer@wrightlegal.net
- kkrivenko@wrightlegal.net
- kstephan@rcolegal.com

Comments:

Sender Name: Andrea Chen - Email: andrea@nobo.us
Address:
5112 189th Avenue NE
Sammamish, WA, 98074
Phone: (206) 973-3919

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