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Supreme Court No. 101502-0
(Court of Appeals No. 82125-3-I)

THE SUPREME COURT OF THE STATE OF
WASHINGTON

STATE OF WASHINGTON,

Petitioner,

v.

JOHN STEARNS,

Respondent.

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

RESPONDENT'S ANSWER TO PETITION FOR REVIEW

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A. IDENTITY OF RESPONDENT AND DECISION BELOW

Respondent John Stearns requests this Court deny review of the Court of Appeals' published decision in *State v. Stearns*, No. 82125-3-I (September 19, 2022).

B. COUNTERSTATEMENT OF THE ISSUES

Preaccusatorial delay violates due process where, considering the prejudice to the defendant and the reasons for the delay, the late prosecution offends fundamental notions of justice. Here, the prosecutor's office determined it had sufficient evidence to charge Mr. Stearns with Ms. Williams' murder in 2005, but made a tactical decision not to do so based solely on the fact that Mr. Stearns was serving a long prison sentence on an unrelated matter. Eleven years later, the case file was discovered in a drawer in the cold case office. Due to the delay, Mr. Stearns was precluded from presenting eyewitness testimony that Ms. Williams walked towards the park in which her body was discovered with a man who did not match Mr.

Stearns' description. The Court of Appeals reversed, finding the negligent delay prejudiced Mr. Stearns.

Should this Court deny review where the Court of Appeals applied the correct legal standard, clearly understood the facts in the record, and issued a decision consistent with this Court's prior decisions involving preaccusatorial delay?

C. STATEMENT OF THE CASE

1. The State waits 12 years to charge Mr. Stearns, and a key witness dies during the interim.

In January 1998, park employees discovered Crystal Williams's body outside the bathrooms in Lavizzo Park in Seattle's Central District. CP 227. Ms. Williams was addicted to crack cocaine and was a sex worker, exchanging sex for money or drugs. CP 229. A used condom was near her body and DNA testing revealed sperm cells from the same donor inside her vagina. 1/14/19RP 8; 11/5/20RP 2213. The DNA did not match anyone in the Combined DNA Index System (CODIS), and the case remained open. *See* CP 4.

The night of the murder, Ms. Williams was with at least four other women, including Taffy Gober and Yvonne Hicks. *See* CP 227-233. The group spent part of the night at a nearby bus stop, where they would wait for dates whom they often brought to Lavizzo Park. 11/2/20RP 1536, 1579-80. The women then moved down the street and waited outside of a corner store to buy beer. 11/2/20RP 1544, 1580. The store did not sell alcohol until 6:00 a.m. CP 272; 11/2/20RP 1548.

Ms. Gober decided she did not want to wait, and left the group around 4:00 a.m. to go to a friend's house. *See* 11/2/20RP 1548. Before leaving, she saw Ms. Williams walking from the store towards the park with a Black man, at least six feet tall and between 45 and 50 years old. CP 232. According to Ms. Gober, the man was wearing a fedora, tweed sports coat, brown khakis, and carried a cane. CP 232. Ms. Gober knew the man from prior interactions and stated he was often violent with sex workers. CP 233. In fact, Ms. Gober used

drugs with him earlier that night and left quickly after the man became angry when she refused to perform oral sex.¹ CP 233.

Ms. Hicks, Ms. William's half-sister, told police she was standing outside the store between 6:00 a.m. and 7:00 a.m., when another man approached Ms. Williams. CP 229. Ms. Hicks was certain about the timing because she was drinking a beer. CP 229, 272. She described the man as Black, in his 40s, and approximately six feet tall. CP 229. He was wearing jeans and was "skinny like a crack cocaine user." CP 229. Ms. Hicks assumed they were going to the park use drugs or have sex. CP 229. After hearing of her sister's murder the following morning,

¹ Based upon Ms. Gober's statements, officers arrested Jimmy Lee Horner. CP 236-37. At the time of his arrest, Mr. Horner was one block from Lavizzo Park, wearing a fedora, tweed coat, and khakis. 11/4/20RP 2040-41. During the interview, Mr. Horner stated he would never hit a woman and mentioned a girl being beaten to death, but he was never told how Ms. Williams died. CP 236-37. Ms. Gober then identified Mr. Horner from a photo montage as the man who walked with Ms. Williams towards the park. CP 236. Law enforcement obtained a warrant for Mr. Horner's DNA, but immediately dismissed him as a suspect when it did not match samples collected at the crime scene. CP 236, 238.

Ms. Hicks went to the King County Medical Examiner's office, where she identified Ms. Williams' body and gave a recorded statement to law enforcement. CP 119, 229.

In 2004, law enforcement was notified that Mr. Stearns' DNA contained within the CODIS database matched the samples from the condom and vaginal swabs in Ms. Williams' case. 1/14/20RP 8. Officers interviewed Mr. Stearns in March 2005.² 1/14/20RP 9. Mr. Stearns denied knowing Ms. Williams or any of the other women involved. 1/14/20RP 14. The prosecutor's office determined there was sufficient evidence to charge Mr. Stearns for Ms. Williams' murder at that time but decided not to do so because Mr. Stearns was already serving a long prison sentence on the other matter. CP 1-2; *see* 1/22/20RP 348-49. The file was then placed in a filing cabinet along with cold cases and was not discovered until 11 years later. The State

² In 2000, Mr. Stearns was sentenced to 720 months confinement after pleading guilty to various offenses stemming from a separate incident at a convenience store. CP 88, 92.

decided to prosecute the case and charged Mr. Stearns with first degree murder in 2017.

Defense counsel moved to dismiss the case for preaccusatorial delay based upon the State's failure to charge Mr. Stearns for over a decade. CP 156-59, 262-69. The defense theory was that Mr. Stearns had consensual sex with Ms. Williams, but that someone else killed her later that night. *See* 1/15/19RP 156. The absence of other sperm on the vaginal swabs showed only that the killer did not sexually assault Ms. Williams or successfully used a condom. 1/15/19RP 157. Moreover, additional pretrial DNA testing revealed small amounts of semen from two other possible donors on Ms. Williams's clothing. 11/5/20RP 2139-42.

Counsel specifically identified the prejudice resulting from the State's delay as the unavailability of Ms. Hicks, who died shortly after the charges were filed in 2017. CP 262-63. Ms. Hicks was one of the last people to see Ms. Williams alive, and her testimony would have both shortened the timeframe in

which the murder could have occurred and established Ms. Williams walked towards the park shortly before her death with someone who did not match Mr. Stearns's physical description. CP 262-63.

The trial court held a pretrial hearing on the motion which included testimony from former deputy prosecuting attorney Jeffrey Baird, who was assigned to Mr. Stearns's case from 1998 through 2017, as well as officers involved in the investigation. Mr. Baird conceded there was no investigatory or other justification for the filing delay after the 2005 DNA match. 1/22/20RP 361, 367. Rather, he was aware Mr. Stearns was serving a long prison sentence on another case and made a calculated decision not to file because the prosecutor's office had more "pressing" matters. 1/22/20RP 349. When a detective repeatedly brought the case to Mr. Baird's attention in 2005, he was "a little flip," saying "he would get to it when he would get to it." 1/14/20RP 28.

The file was then relegated to the cold case unit for over a decade. 1/14/20RP 35. Detective Norton, who was originally involved in Ms. Williams's case, was assigned to the unit in 2016. 1/14/20RP 34, 45. He described finding files laying around the office and began picking cases at random to work on. 1/14/20RP 63. He happened to come upon Ms. Williams' file in late 2016, realized Mr. Stearns had yet to be charged, and brought the case to Mr. Baird's attention. 1/14/20RP 45-46.

The court denied defense counsel's motion, concluding the death of Ms. Hicks did not prejudice Mr. Stearns. 1/22/20RP 387. The jury found Mr. Stearns guilty as charged, and the court sentenced him to life without the possibility of parole as a persistent offender. CP 373-74, 384.

2. The Court of Appeals applies the correct legal standard and rightly concludes the State's negligent filing delay prejudiced Mr. Stearns.

The Court of Appeals reversed, finding the preaccusatorial delay violated Mr. Stearns' right to due process. Slip op. at 2. The Court of Appeals applied the well-established three-step

analysis to evaluate the issue as articulated in *State v. Oppelt*, 172 Wn.2d 285, 257 P.3d 653 (2011), and *State v. Maynard*, 183 Wn.2d 253, 351 P.3d 159 (2015). Slip op. at 5-6. The Court ultimately concluded the death of Ms. Hicks prejudiced Mr. Stearns for several reasons: she provided a shorter timeframe than Ms. Gober in which Ms. Williams could have been killed, saw Ms. Williams walk with a man who did not match Mr. Stearns' description towards the park in which her body was discovered, and any discrepancy between Ms. Hicks and Ms. Gober's testimony suggested Ms. Williams went to the park twice that night (what the trial court referred to as a "string of customers"). Slip op. at 6-10. The Court of Appeals also noted Mr. Baird did not recall any credibility issues with Ms. Hicks, and Ms. Hicks was able to tie her testimony to verifiable facts. Slip op. at 7, 10.

The Court of Appeals was clearly familiar with the record in this case, describing the DNA evidence in detail (from both Mr. Stearns and other contributors), quoting Ms. Hicks'

recorded statement with law enforcement, quoting Mr. Baird's and officer testimony from the hearing, and correctly identifying how Ms. Hicks' testimony fit with Mr. Stearns' defense. *See* Slip op. at 9-14. The Court of Appeals recognized the need to leave room for a prosecutor's pragmatic decision and an effective use of resources, Slip op. at 12, but rightly recognized the true basis of the failure to timely charge Mr. Stearns was his incarceration. Slip op. at 15. Under the circumstances, the Court properly reiterated that incarceration "alone cannot justify an unduly long filing delay as incarcerated persons are entitled to due process just as anyone else accused of a crime." Slip op. at 15.

The Court of Appeals denied the State's motion for reconsideration. Order Denying Mtn. for Reconsideration (October 31, 2022).

D. REASONS THIS COURT SHOULD DENY REVIEW

1. The Court of Appeals opinion is consistent with this Court's decisions in *State v. Oppelt* and *State v. Maynard*.

The State grasps at straws in an attempt to get review.

Despite never having raised the argument in either the trial court or the Court of Appeals, the State now bizarrely argues that the Court of Appeals erred in finding the 12-year filing delay prejudiced Mr. Stearns because there is no statute of limitations for murder. *See* Pet. at 11-12. The State relies on *United States v. Marion*, 404 U.S. 307, 324-25, 92 S. Ct. 455, 30 L. Ed. 2d 468 (1971), apparently for the proposition that the statute of limitations, and not due process, is the true measurement for prejudice from preaccusatorial delay. *See* Pet. at 12. Yet *Marion* emphasized “that the statute of limitations does not fully define the appellees’ rights with respect to the events occurring prior to indictment.” *Id.* at 324. The Court confirmed that charges would also require dismissal under the

Fifth Amendment if the delay causes actual prejudice to the defendant. *Id.* at 324-25.

The State next attempts to portray the opinion in Mr. Stearns' case as conflicting with this Court's decision in *State v. Maynard*, 183 Wn.2d 253, 352 P.3d 159 (2015). Pet at 15-17. *Maynard*, a juvenile case, involved an eight-month preaccusatorial delay in order for the prosecution to seek additional information about restitution amounts. *Id.* at 257. At arraignment, Maynard's attorney failed to notice that he would turn 18 three weeks later. *Id.* The prosecution then contacted defense counsel and notified her of Maynard's birthday, but his attorney did not read the email until after he turned 18, resulting in the juvenile court's loss of jurisdiction. *Id.* at 258. This Court concluded Maynard failed to show actual prejudice from any preaccusatorial delay because the prosecutor filed charges before Maynard turned 18, and it was his attorney's failure to request an extension, not the State filing, that resulted in the

prejudice. *Id.* at 260. Thus, Maynard was deprived of effective assistance of counsel. *Id.* at 260-61.

In trying to analogize the facts in *Maynard* to Mr. Stearns' case, the crux of the State's argument appears to be that, because the State did not intentionally wait for Ms. Hicks to die before filing charges, the Court of Appeals was wrong to find prejudice. Pet. at 16-17. The State reasons the prejudice was caused by defense counsel, who could have interviewed Ms. Hicks "to document the facts to which she would have testified." Pet. at 16. What the State fails to mention is that defense counsel was not provided with the State's witness list until *after* Ms. Hicks' death. CP 321-23. This was after defense counsel repeatedly requested the information, telling the prosecutor "I know we set this [case] out a way, but hopefully we can stay on top of it. Do you have a tentative witness list so we can start discussing scheduling witness interviews." CP 321-22. The State's current argument also misses the larger point that defense counsel already had a sense of Ms. Hicks's likely

testimony given her statements in her recorded interview with Detective O’Keefe. CP 271-77. There was simply no reason for defense counsel to rush to depose Ms. Hicks or otherwise “document” the facts.

The State’s concession that there was a “greater likelihood” Ms. Hicks would have been able to testify at trial had the charges been timely is unnecessary. Pet. at 16. There is no “likelihood” about it; Ms. Hicks died four months after the State filed charges. CP 262. She would have been alive at the time of trial but for the 12-year preaccusatorial delay. The Court of Appeals’ opinion did not conflict with *Mayard* and does not warrant review.

The State next tries to paint the Court of Appeals’ opinion as contrary to this Court’s decision in *State v. Oppelt*, 172 Wn.2d 285, 257 P.3d 653 (2011). Pet. at 18-20, 22. This argument fails for two reasons. First, the government conduct in *Oppelt* was fundamentally different than in Mr. Stearns’ case. In *Oppelt*, the report filed by the investigating officer

inadvertently did not make it to the prosecutor's office, resulting in a six year filing delay. *Id.* at 288. Here, despite multiple requests by law enforcement, 1/22/20RP 28, the prosecutor decided not to file charges solely due to Mr. Stearns' incarceration. 1/22/20RP 349. A detective unearthed the file in a "storage room" a decade later. 1/14/20RP 45.

Second, the prejudice in *Oppelt* is not even remotely similar to that in Mr. Stearns' case. *Oppelt*, facing charges of child molestation, argued the delay required dismissal because the child's grandmother was unable to recall the type of lotion she applied to the child's genital area, precluding him from arguing any redness or swelling was a result of a particular brand of lotion. 172 Wn.2d at 269. The trial court denied *Oppelt*'s motion to dismiss and this Court affirmed, finding *Oppelt* was still able to argue that the redness could have resulted from lotion and there were no other problems with the grandmother's memory. *Id.*

As the Court of Appeals rightly recognized in this case, *Oppelt* was truly an issue of faded witness testimony. *See* Slip op. at 14 n. 10. The prejudice in *Oppelt* would be somewhat analogous to this case if Ms. Hicks testified at trial but was unable to remember the exact physical characteristics of the man she saw walk with Ms. Williams to Lavizzo Park.³ Instead, the Court of Appeals rightly identified Ms. Hicks' testimony as narrowing the window in which Ms. Williams could have been killed by several hours, showing Ms. Williams walked towards the park shortly before she was murdered with a man not matching Mr. Stearns' description, and corroborating or addressing discrepancies in Taffy Gober's testimony. Slip op. at 6-7.

Ultimately, the State's arguments confuse sufficiency of the evidence with prejudice associated with pretrial delay. The

³ Put another way, the prejudice in the two cases could be analogous if the victim's grandmother in *Oppelt* died during the delay but previously told law enforcement the exact name of the lotion, which was recalled for causing redness and swelling.

State argues that, because the evidence established Mr. Stearns committed the crime, he cannot establish a due process violation. *See* Pet. at 21-23. But a sufficiency analysis was not adopted in either *Oppelt* or *Maynard*. The Court of Appeals in this case correctly applied the three-step analysis in *Maynard* and *Oppelt* to find actual prejudice in Mr. Stearns' case. Slip op. at 6. The State is clearly unhappy with the Court of Appeals' decision, but there is simply no conflict requiring clarification of the "standard of prejudice" in cases of preaccusatorial delay. Pet. at 22. This Court should deny review.

2. The Court of Appeals' opinion is consistent with United States Supreme Court precedent.

The State next asserts review is warranted because the Court of Appeals failed to understand the legal distinction between developing probable cause to arrest and the evidence required for a conviction. *See* Pet. at 23-25. Namely, the State believes the Court of Appeals' decision implies the prosecutor

must file charges immediately after establishing probable cause, which was rejected in *United States v. Lovasco*, 431 U.S. 783, 97 S. Ct. 2044, 52 L. Ed. 2d 752 (1977). *See* Pet. at 23-25. The opinion says nothing of the sort. The Court of Appeals explicitly referred to the “probable cause to charge,” Mr. Stearns, not the probable cause to arrest him. Slip op. at 12. The Court also emphasized that the prosecutor “did not indicate the need for more evidence” to file charges in 2005. Slip op. at 12. This was consistent with Detective Kilberg’s testimony that he “never even got a wish list on the – the things that possibly would have improved it from a prosecutor standpoint.”

1/14/20RP 30.

The link between the development of probable cause and the prosecutor’s filing decision was particularly intertwined in this case because the case was part of the Most Dangerous Offender Project (MDOP), which matched law enforcement with prosecutors “from start to finish.” 1/14/20RP 27. Mr. Baird was at the crime scene in 1998 and even “inserted”

himself into the investigation. 1/22/20RP 355. And, under MDOP, police officers were not allowed to write a certification of probable cause without permission from the prosecutor; “even if [officers] thought the case was fileable you wouldn’t send it in for filing if the prosecutor wasn’t ready.” 1/14/20 31. Detective Kilberg went to Mr. Baird on two occasions in 2005, saying “let’s start working on this.” 1/14/20RP 28. Mr. Baird was somewhat flip, responding “he would get to it when he would get to it.” 1/14/20RP 28. It was 12 years later, when Mr. Baird decided to “get to” Mr. Stearns’ case, that Detective Norton was authorized to draft the “certification for determination of probable cause.” *See* CP 4.

More importantly, the Court of Appeals rightly focused on Mr. Baird’s own statements regarding the basis for the delay. Slip op. at 11-12. Mr. Baird was candid that he did not file charges because Mr. Stearns was serving a long prison sentence and the prosecutor had a high caseload. 1/22/20RP 344-45. When asked directly why he did not file charges in

2005, Mr. Baird stated “I had more pressing things to do.”

1/22/20RP 348-49. Mr. Baird confirmed, there was “no investigative purpose or justification” for the decade-plus delay.

1/22/20 RP 361.

Contrary to the State’s argument, the Court of Appeals also explicitly recognized “the need for pragmatic decision-making and efficient use of resources within the prosecutor’s office,” but concluded the extensive delay in Mr. Stearns’ case “went well beyond such.” Slip op. at 12.

The State’s argument that the delay was necessary because of Mr. Baird’s “complex factual investigation and legal evaluation” which was “not complete in this case until 2017” is belied by the record. Pet. at 25. Namely, the State conveniently overlooks that the investigation wasn’t complete until 2017 because the file was not unearthed until late 2016. 1/14/20RP 35. To the extent that additional investigation was done in 2017, much of it was a direct result of the delay; as described by Detective Norton, the work involved “attempting to locate

witnesses to see if they were still alive and able to testify.”

1/14/20RP 47. The additional DNA testing referenced by the State was not requested until the State decided to file charges.

1/22/20RP 352-53. Yet, as the Court of Appeals properly recognized, Mr. Baird failed to respond to the lab’s inquiries in 2005 regarding additional testing. Slip op. at 13. Mr. Baird’s primary legal evaluation—consulting with the appellate unit—revealed the State benefited from the delay inasmuch as the case law surrounding the admission of prior bad acts under ER 404(b) was more favorable than in 2005.⁴

⁴ The prosecutor at Mr. Stearns’ trial initially attempted to explain the delayed filing as a result of favorable developments in case law. Specifically, the State “looked at [the case] more carefully” in 2016 in light of this Court’s decision in *Gresham* and *Williams*, discussing the admission of ER 404(b) evidence. 1/13/20RP 70-71. The prosecutor quickly backtracked after the court noted it would be improper for the State to wait for the law to improve to file charges. 1/13/20RP 70-71. The prosecutor then acknowledged, “[f]rom 2005 to 2016 I think that’s what the Court is zeroing in on. And, you know, the reality was that the defendant was in prison.” 1/13/20RP 71.

The State now suggests the preaccusatorial delay was not prejudicial because asking witnesses to testify in the context of a weak case would be traumatizing. *See* Pet. at 30. Yet the Court of Appeals recognized that it was the delay that “caused an injustice to Williams’s family and others impacted by the crime.” Slip op. at 15. Although not mentioned by the Court of Appeals, one wonders whether the State’s response would have been different had Ms. Williams not been a Black sex worker.

Finally, this Court should squarely reject the State’s argument that the decision “deprives the people of Washington of the opportunity to hold Stearns accountable[.]” Pet. at 11. It is the State, and not the Court of Appeals, that decided it could wait 12 years—and who knows how long if Detective Norton had not discovered the file—to seek accountability. As the Court of Appeals recognized, “[w]e are applying a severe remedy in a very serious case. However, it is precisely in cases where the stakes are highest that the State should exercise the most care in

ensuring that negligence does not violate the rights of the accused.” Slip op. at 15.

E. CONCLUSION

The Court of Appeals properly applied existing case law to the facts in Mr. Stearns’ case and found the delay prejudiced Mr. Stearns. This Court should deny review.

DATED this 3rd day of January, 2023.

This motion is proportionately spaced using 14-point font equivalent to Times New Roman and contains 3,877 words (word count by Microsoft Word).

Respectfully submitted,

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