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SUPREME COURT
STATE OF WASHINGTON
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IN THE WASHINGTON SUPREME COURT

STATE OF WASHINGTON,)	No. 98846-3
)	
Respondent,)	STATEMENT OF
)	ADDITIONAL
v.)	AUTHORITIES
)	IN SUPPORT OF
SANTIAGO SANTOS,)	PETITION FOR REVIEW
)	AND RELIEF UNDER
Petitioner.)	<u>STATE V. BLAKE</u> ¹

Under RAP 10.8, Santiago Santos, the petitioner, submits the following additional authority for this Court’s consideration on the issue of whether Mr. Santos’s prior out-of-state convictions for drug possession were erroneously counted in his offender score. State v. Markovich, No. 81423-1-I, slip op. at 13-16 (Wash. Ct. App. Aug. 2, 2021) (error to score out-of-state drug possession convictions under Blake, requiring remand for resentencing), available at <https://www.courts.wa.gov/opinions/pdf/814231.pdf>.

Respectfully submitted this 3rd day of August, 2021.



Richard W. Lechich – WSBA #43296
Washington Appellate Project – #91052
Attorney for Petitioner

¹ 197 Wn.2d 170, 481 P.3d 521 (2021).

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Date: August 3, 2021

WASHINGTON APPELLATE PROJECT

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Transmittal Information

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Appellate Court Case Title: State of Washington v. Santiago Alberto Santos
Superior Court Case Number: 14-1-01649-8

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