

FILED
Court of Appeals
Division II
State of Washington
6/20/2018 4:20 PM

No. 50899-1-II

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION TWO

STATE OF WASHINGTON,

Respondent,

v.

PATRICK MICHAEL BELSER,

Appellant.

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

BRIEF OF APPELLANT

THOMAS M. KUMMEROW
Attorney for Appellant

WASHINGTON APPELLATE PROJECT
1511 Third Avenue, Suite 701
Seattle, Washington 98101
(206) 587-2711
tom@washapp.org

TABLE OF CONTENTS

A. SUMMARY OF ARGUMENT 1

B. ASSIGNMENTS OF ERROR 1

C. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR 2

D. STATEMENT OF THE CASE..... 4

E. ARGUMENT 6

 1. Mr. Belser’s waiver of his right to counsel was not knowingly, intelligently and voluntarily made, thus invalid. 6

 2. The imposition of the challenged conditions of community custody violate the United States and Washington Constitutions and must be stricken. 9

 a. *Courts may only impose conditions that are constitutional and statutorily authorized.*.....**Error! Bookmark not defined.**

 b. *The condition prohibiting Mr. Belser from possessing or consuming marijuana is not crime-related and should be stricken.*..... 100

 c. *The condition barring Mr. Belser from accessing social media is unconstitutionally overbroad and must be stricken.*..... 12

 d. *The condition barring Mr. Belser from entering locations where minors are known to congregate is void for vagueness and must be stricken.*..... 15

F. CONCLUSION 17

TABLE OF AUTHORITIES

UNITED STATES CONSTITUTIONAL PROVISIONS

U.S. Const. amend. I.....	3, 12, 13, 14
U.S. Const. amend. VI.....	2, 6
U.S. Const. amend. XIV	6, 15

WASHINGTON CONSTITUTIONAL PROVISIONS

Article I, section 22.....	2, 6
----------------------------	------

FEDERAL CASES

<i>Ashcroft v. American Civil Liberties Union</i> , 542 U.S. 656, 124 S.Ct. 2783, 159 L.Ed.2d 690 (2004).....	12
<i>Faretta v. California</i> , 422 U.S. 806, 95 S.Ct. 2525, 45 L.Ed.2d 562 (1975).....	6, 7
<i>Martin v. City of Struthers, Ohio</i> , 319 U.S. 141, 63 S.Ct. 862, 87 L.Ed. 1313 (1943).....	12
<i>Mempa v. Rhay</i> , 389 U.S. 128, 19 L. Ed. 2d 336, 88 S. Ct. 254 (1967).....	6
<i>Packingham v. North Carolina</i> , ___ U.S. ___, 137 S.Ct. 1730, 198 L.Ed.2d 273 (2017).....	13, 14
<i>Reno v. ACLU</i> , 521 U.S. 844, 117 S.Ct. 2329, 138 L.Ed.2d 874 (1997).....	12

WASHINGTON CASES

<i>City of Bellevue v. Acrey</i> , 103 Wn.2d 203, 691 P.2d 957 (1984).....	7
<i>First United Methodist Church v. Hearing Exam'r</i> , 129 Wn.2d 238, 916 P.2d 374 (1996).....	10
<i>Spokane v. Douglass</i> , 115 Wn.2d 171, 795 P.2d 693 (1990).....	15

<i>State v. Bahl</i> , 164 Wn.2d 739, 193 P.3d 678 (2008)	passim
<i>State v. Dougherty</i> , 33 Wn.App. 466, 655 P.2d 1187 (1982).....	7
<i>State v. Halstien</i> , 122 Wn.2d 109, 857 P.2d 270 (1993)	12
<i>State v. Howard</i> , 1 Wn.App.2d 420, 405 P.3d 1039, 1044 (2017).....	8
<i>State v. Irwin</i> , 191 Wn.App. 644, 364 P.3d 830 (2015)	15, 16
<i>State v. Lawrence</i> , 166 Wn.App. 378, 271 P.3d 280 (2012)	7
<i>State v. Madsen</i> , 168 Wn.2d 496, 229 P.3d 714 (2010)	6
<i>State v. Mehrabian</i> , 175 Wn.App. 678, 308 P.3d 660 (2013)	7
<i>State v. Modica</i> , 136 Wn.App. 434, 149 P.3d 446 (2006).....	7
<i>State v. O’Cain</i> , 144 Wn.App. 772, 184 P.3d 1262 (2008).....	11
<i>State v. Sanchez Valencia</i> , 169 Wn.2d 782, 239 P.3d 1059 (2010)	10
<i>State v. Silva</i> , 107 Wn.App. 605, 27 P.3d 663 (2001).....	6
<i>State v. Silva</i> , 108 Wn.App. 536, 31 P.3d 729 (2001).....	7, 8
<i>State v. Williams</i> , 157 Wn.App. 689, 239 P.3d 600 (2010).....	11
STATUTES	
RCW 69.50.360	11
RCW 69.50.4013	11
RCW 9.94A.030	9, 10
RCW 9.94A.505	9
RCW 9.94A.703	9

A. SUMMARY OF ARGUMENT

Patrick Belser was charged with multiple counts of inappropriate sexual contact involving children. Prior to trial, Mr. Belser sought to waive his right to counsel and proceed *pro se*. The trial court engaged in a colloquy which was fatally deficient, as the court failed to advise Mr. Belser of the offenses he was facing, the maximum sentences applicable to each offense, and the potential for an exceptional sentence. As Mr. Belser's subsequent waiver of the right to counsel was not knowingly, voluntarily, or intelligently entered his convictions should be reversed.

In the alternative, a number of the conditions of community custody imposed must be stricken as unconstitutionally overbroad, void for vagueness, or not crime related.

B. ASSIGNMENTS OF ERROR

1. The trial court violated Mr. Belser's constitutionally protected right to counsel.

2. Mr. Belser's waiver of his right to counsel was not knowingly, voluntarily or intelligently forfeited.

3. The condition of community custody imposed by the trial court barring Mr. Belser from possessing or consuming marijuana was not crime related.

4. The condition of community custody imposed by the trial court barring Mr. Belser from using electronic media was unconstitutionally overbroad.

5. The condition of community custody imposed by the trial court barring Mr. Belser from entering or frequenting places where minors gather or are known to congregate was void for vagueness.

C. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR

1. Under the Sixth Amendment and art. I, section 22, a defendant has a right to counsel. That right may be waived when the waiver is made knowingly, voluntarily, and intelligently. The method for assuring the waiver passes constitutional muster is through a colloquy, in which the court, at a minimum, advises the defendant of the offenses for which he is charged and the maximum sentences the defendant faces if convicted of those offenses. Here, the court's colloquy was deficient as a matter of law because it failed to advise Mr. Belser of the offenses with which he was charged and the maximum

sentences he faced if convicted. Is Mr. Belser entitled to reversal of his convictions for a violation of his right to counsel?

2. The trial court's power at sentencing is statutory. By statute, the court may impose "crime-related" prohibitions as a condition of the sentence. Here, the court imposed a condition of community placement that Mr. Belser not consume or possess marijuana, where there was no evidence marijuana was used or contributed to the offense, and possession of marijuana is legal. Should this provision be stricken as not crime-related?

3. A crime-related prohibition that infringes on First Amendment free speech rights is unconstitutionally overbroad and must be stricken. Barring the use of electronic media in order to access the internet or social networks is unconstitutionally overbroad. Here, the court barred Mr. Belser from using electronic media. Should this unconstitutional prohibition be stricken?

4. A crime related prohibition that fails to provide ascertainable standards of guilt to protect against arbitrary enforcement is void for vagueness and must be stricken. Here, the court imposed a condition of community placement that Mr. Belser not enter or frequent places where minors reside or congregate, a condition which has previously

been found to be void for vagueness because it contains no ascertainable standards for protecting against arbitrary enforcement. Should this provision be stricken as void for vagueness?

D. STATEMENT OF THE CASE

In 2015, while stationed at Joint Base Lewis McChord, Z.R. told his legal officer that as a child, he was molested by Mr. Belser, the person he thought was his biological father. RP 447, 464.¹ An investigation disclosed allegations involving Z.R.'s stepbrothers, J.A.M. and G.B.P. As a result, Mr. Belser was charged with one count of second degree rape, one count of second degree child molestation, one count of third degree child molestation involving Z.R., one count of third degree rape, one count of third degree child molestation involving J.A.M., and one count of sexual exploitation of a minor involving G.B.P. CP 9-11. Each count also contained aggravating factor allegations that the offense was part of an ongoing pattern of sexual abuse and that Mr. Belser used his position of trust to commit the offenses. CP 9-11.

¹ Mr. Belser and Z.R.'s mother, Jennifer Boyd, believed Mr. Belser was Z.R.'s father. RP 551. In 2015, a DNA test revealed that Mr. Belser was not Z.R.'s father. RP 552.

Prior to trial, Mr. Belser moved to represent himself and proceed *pro se*. RP 27-28. The trial court engaged Mr. Belser in a colloquy at the conclusion of which the trial court granted Mr. Belser's motion, deeming his waiver knowing, voluntary and intelligent. CP 8; RP 37. Absent from the court's discussion with Mr. Belser was a description of the offenses with which he was charged, the maximum sentence for each offense, the potential for an indeterminate sentence on the second degree child rape count, and the possibility of an exceptional sentence given the aggravating factors.

At the conclusion of the trial, the jury found Mr. Belser guilty as charged. CP 132-46. The trial court imposed an exceptional sentence that was composed of an indeterminate sentence of 230 months on the second degree rape count, which the court ran consecutive to the remaining counts which ran concurrent to each other, for an aggregate sentence of 350 months as the minimum term. CP 159.

E. ARGUMENT

1. **Mr. Belser’s waiver of his right to counsel was not knowingly, intelligently and voluntarily made, thus invalid.**

The Sixth Amendment provides that “the accused shall enjoy the right . . . to have the Assistance of Counsel for his defence.” U.S. Const. amend. VI. In felony cases, a criminal defendant is entitled to be represented by counsel at all critical stages of the prosecution, including sentencing. *Mempa v. Rhay*, 389 U.S. 128, 134-37, 19 L. Ed. 2d 336, 88 S. Ct. 254 (1967).

The Sixth and Fourteenth Amendments to the United States Constitution allow criminal defendants to waive their right to assistance of counsel. *Faretta v. California*, 422 U.S. 806, 807, 95 S.Ct. 2525, 45 L.Ed.2d 562 (1975).² The Washington Constitution also guarantees the right to self-representation. Art. I, sec. 22; *State v. Silva*, 107 Wn.App. 605, 620-21, 27 P.3d 663 (2001).

To exercise the right to self-representation, the criminal defendant must knowingly and intelligently waive the right to counsel; that waiver should include advice about the dangers of and

² The Sixth Amendment’s right to counsel carries with it the implicit right to self-representation. *Faretta*, 422 U.S. at 818. Article I, section 22 of the Washington Constitution creates an explicit right to self-representation. *State v. Madsen*, 168 Wn.2d 496, 503, 229 P.3d 714 (2010).

disadvantages of self-representation. *Faretta*, 422 U.S. at 835. A thorough colloquy on the record is the preferred method of ensuring an intelligent waiver of the right to counsel. *City of Bellevue v. Acrey*, 103 Wn.2d 203, 211, 691 P.2d 957 (1984); *State v. Dougherty*, 33 Wn.App. 466, 469, 655 P.2d 1187 (1982). The colloquy must, at a minimum, consist of informing the defendant of the nature and classification of the charge and the maximum penalty upon conviction. *State v. Mehrabian*, 175 Wn.App. 678, 690, 308 P.3d 660 (2013).

Courts should engage in a presumption against waiver of the right to counsel. *State v. Lawrence*, 166 Wn.App. 378, 390, 271 P.3d 280 (2012). Because the right to counsel is so fundamental, a trial court's erroneous finding that the defendant validly waived the right to counsel cannot be treated as harmless error. *State v. Silva*, 108 Wn.App. 536, 542, 31 P.3d 729 (2001) ("It is fundamental that deprivation of the right to counsel is so inconsistent with the right to a fair trial that it can never be treated as harmless error."). Further, the determination of whether a waiver is knowing is at the time of waiver. *See State v. Modica*, 136 Wn.App. 434, 445, 149 P.3d 446 (2006) ("[T]he proper inquiry in determining the 'knowing' waiver of a right

to counsel is the state of mind and knowledge of the defendant *at the time the waiver is made.*”).

The maximum penalty for the charged crime is essential information that a defendant needs in deciding whether to represent himself or herself. *Silva*, 108 Wn.App. at 541. A waiver of the right to counsel is invalid if the trial court does not inform the defendant of the maximum penalty for the charged crime and the defendant is not otherwise aware of the maximum penalty. *State v. Howard*, 1 Wn.App.2d 420, 405 P.3d 1039, 1044 (2017).

[E]ven the most skillful of defendants cannot make an intelligent choice without knowledge of all facts material to the decision. *Silva* was never advised of the maximum possible penalties for the crimes with which he was charged. Absent this critical information, *Silva* could not make a knowledgeable waiver of his constitutional right to counsel.

Silva, 108 Wn.App. at 541.

Here, the trial court’s colloquy was inadequate as a matter of law. The court asked Mr. Belser about his educational background, familiarity with the rules of evidence, motivation for self-representation, and understanding that neither the judge nor stand-by counsel would assist him at trial. But the court never informed Mr. Belser about the nature and classification of the charged offenses or the

maximum penalties if he was convicted. The court also never advised Mr. Belser regarding the indeterminate sentence required for second degree child molestation or the potential for an exceptional sentence if convicted of the offenses given the aggravating factor allegations.

The trial court's colloquy was deficient as a matter of law. As a result, Mr. Belser's waiver of the right to counsel was not knowingly, voluntarily, or intelligently made. In light of this fact, this Court should reverse Mr. Belser's convictions and remand for a new trial.

2. The imposition of the challenged conditions of community custody violate the United States and Washington Constitutions and must be stricken.

- a. *Courts may only impose conditions that are constitutional and statutorily authorized.*

Under the Sentencing Reform Act (SRA), a court has the authority to impose "crime-related prohibitions" and affirmative conditions as part of a felony sentence. RCW 9.94A.505(8). "'Crime-related prohibition' means an order of a court prohibiting conduct that directly relates to the circumstances of the crime for which the offender has been convicted." RCW 9.94A.030(10). A court may order compliance "with any crime-related prohibitions" as a condition of community custody. RCW 9.94A.703(3)(f).

There is no need to demonstrate that the condition has been enforced before challenging the condition; a preenforcement challenge is ripe for review. *State v. Bahl*, 164 Wn.2d 739, 752, 193 P.3d 678 (2008). Community custody conditions are ripe for review on direct appeal ““if the issues raised are primarily legal, do not require further factual development, and the challenged action is final.”” *Bahl*, 164 Wn.2d at 751, quoting *First United Methodist Church v. Hearing Exam’r*, 129 Wn.2d 238, 255-56, 916 P.2d 374 (1996).

This court reviews community custody conditions for an abuse of discretion and, will reverse them if they are “manifestly unreasonable.” *State v. Sanchez Valencia*, 169 Wn.2d 782, 791-92, 239 P.3d 1059 (2010). Imposing an unconstitutional condition or one not authorized by statute will always be “manifestly unreasonable.” *Id.*

b. *The condition prohibiting Mr. Belser from possessing or consuming marijuana is not crime-related and should be stricken.*

A “crime-related prohibition” is defined as “[a]n order of the court prohibiting conduct that directly relates to the circumstances of the crime for which the offender has been convicted.” RCW 9.94A.030(10). Although no causal link need be established between the condition imposed and the crime committed, the condition must

relate to the circumstances of the crime. *State v. Williams*, 157 Wn.App. 689, 691-92, 239 P.3d 600 (2010). A condition is not crime-related if there is no evidence linking the prohibited conduct to the offense. *State v. O’Cain*, 144 Wn.App. 772, 775, 184 P.3d 1262 (2008).

The condition prohibiting Mr. Belser from possessing or consuming marijuana violates these rules. First, possession of marijuana is legal. *See* RCW 69.50.4013(3)(a) (“The possession, by a person twenty-one years of age or older, of useable marijuana, marijuana concentrates, or marijuana-infused products in amounts that do not exceed those set forth in RCW 69.50.360(3) is not a violation of this section, this chapter, or any other provision of Washington state law.”).

More importantly, this condition is not crime-related. There was no evidence Mr. Belser used marijuana in order to commit these offenses

This condition is not crime-related and must be stricken. *O’Cain*, 144 Wn.App. at 775. (“ Because the prohibition in this case is not crime-related, we conclude it must be stricken.”).

- c. *The condition barring Mr. Belser from accessing social media is unconstitutionally overbroad and must be stricken.*

Overbreadth analysis measures how statutes (or conditions of community custody) that prohibit conduct fit within the universe of constitutionally protected conduct. *See State v. Halstien*, 122 Wn.2d 109, 121, 857 P.2d 270 (1993). A condition of community custody is overbroad if it sweeps within its prohibitions free speech activities protected under the First Amendment. *Id.*

Offenders on community custody have a right to access and transmit material protected by the First Amendment. *Bahl*, 164 Wn.2d at 753. The First Amendment “embraces the right to distribute literature, and necessarily protects the right to receive it.” *Martin v. City of Struthers, Ohio*, 319 U.S. 141, 143, 63 S.Ct. 862, 87 L.Ed. 1313 (1943). It protects material disseminated over the internet as well as by the means of communication devices used prior to the high-tech era. *Reno v. ACLU*, 521 U.S. 844, 868, 117 S.Ct. 2329, 138 L.Ed.2d 874 (1997). Thus, restrictions upon access to the Internet necessarily curtail First Amendment rights. *Ashcroft v. American Civil Liberties Union*, 542 U.S. 656, 124 S.Ct. 2783, 159 L.Ed.2d 690 (2004).

A total ban on internet access and social media violates the First Amendment. *Packingham v. North Carolina*, ___ U.S. ___, 137 S.Ct. 1730, 1737, 198 L.Ed.2d 273 (2017). In *Packingham*, the defendant, a registered sex offender, was convicted under a statute which barred registered sex offenders from “access[ing] a commercial social networking Web site where the sex offender knows that the site permits minor children to become members or to create or maintain personal Web pages.” 137 S.Ct. 1733. The Supreme Court began its analysis by noting:

[G]iven the broad wording of the North Carolina statute at issue, it might well bar access not only to commonplace social media websites but also to websites as varied as Amazon.com, Washingtonpost.com, and Webmd.com. The Court need not decide the precise scope of the statute. It is enough to assume that the law applies (as the State concedes it does) to social networking sites “as commonly understood” - that is, websites like Facebook, LinkedIn, and Twitter.

Id., at 1736-37 (internal citations omitted). In finding the statute violated the First Amendment, the Court held that:

[T]he statute here enacts a prohibition unprecedented in the scope of First Amendment speech it burdens. Social media allows users to gain access to information and communicate with one another about it on any subject that might come to mind. By prohibiting sex offenders from using those websites, North Carolina with one broad stroke bars access to what for many are the principal sources for knowing current events, checking

ads for employment, speaking and listening in the modern public square, and otherwise exploring the vast realms of human thought and knowledge. These websites can provide perhaps the most powerful mechanisms available to a private citizen to make his or her voice heard. They allow a person with an Internet connection to “become a town crier with a voice that resonates farther than it could from any soapbox.”

In sum, to foreclose access to social media altogether is to prevent the user from engaging in the legitimate exercise of First Amendment rights. It is unsettling to suggest that only a limited set of websites can be used even by persons who have completed their sentences. Even convicted criminals - and in some instances especially convicted criminals - might receive legitimate benefits from these means for access to the world of ideas, in particular if they seek to reform and to pursue lawful and rewarding lives.

Packingham, 137 S. Ct. at 1737 (internal citations omitted).

The condition here restricts Mr. Belser’s use of electronic media, depriving him of the easiest way to pay his bills, check the weather, stay on top of world events, and keep in touch with friends. *See Packingham*, 137 S.Ct. at 1737; *Bahl*, 137 Wn.App. at 714-15 (a community custody condition is overbroad if the condition encompasses matters that are not crime related.).

This ban is overbroad in that it impermissibly infringes on core First Amendment rights. *Packingham*, 137 S.Ct. at 1737. This Court should strike this condition of community custody.

- d. *The condition barring Mr. Belser from entering locations where minors are known to congregate is void for vagueness and must be stricken.*

Under the Due Process Clause of the Fourteenth Amendment, a prohibition is void for vagueness if either (1) it does not define the offense with sufficient definiteness such that ordinary people can understand what conduct is prohibited, or (2) it does not provide ascertainable standards of guilt to protect against arbitrary enforcement. *Spokane v. Douglass*, 115 Wn.2d 171, 178, 795 P.2d 693 (1990). Thus, a condition of community custody is unconstitutionally vague if it fails to do either. *Bahl*, 164 Wn.2d at 753.

In *State v. Irwin*, this Court struck this same condition of community custody barring persons from frequenting places where minors reside or congregate on vagueness grounds. 191 Wn.App. 644, 655, 364 P.3d 830 (2015). The Court noted that adding examples, such as here, arguably resolves the first prong of the vagueness test, providing notice of the conduct proscribed. *See id.* (“It may be true that, once the CCO sets locations where “children are known to congregate” for Irwin, Irwin will have sufficient notice of what conduct is proscribed.”). But, the Court pointed out that giving sufficient notice does not solve the vagueness problem:

It may be true that, once the CCO sets locations where “children are known to congregate” for Irwin, Irwin will have sufficient notice of what conduct is proscribed. But, although that would help the condition satisfy the first prong of the vagueness analysis, it would leave the condition vulnerable to arbitrary enforcement. *See Bahl*, 164 Wn.2d at 753, 193 P.3d 678; *Sansone*, 127 Wn.App. at 639, 111 P.3d 1251. The potential for arbitrary enforcement would render the condition unconstitutional under the second prong of the vagueness analysis. *See Bahl*, 164 Wn.2d at 753, 193 P.3d 678.

Irwin, 191 Wn.App. at 655.

Here, the condition is void for vagueness because it is vulnerable to arbitrary enforcement. The condition provides that DOC is the entity to enforce this condition by determining the locations that would violate the condition. CP 170, 172. Thus, because the condition encompasses a wide range of locations, it “does not provide ascertainable standards of guilt to protect against arbitrary enforcement.” *Bahl*, 164 Wn.2d at 753. As a consequence, the condition is void for vagueness and must be stricken. *Irwin*, 191 Wn.App. at 655.

F. CONCLUSION

For the reasons stated, Mr. Belser asks this Court to reverse his convictions and remand for a new trial or strike the offending conditions of community custody.

DATED this 20th day of June 2018.

Respectfully submitted,

s/Thomas M. Kummerow

THOMAS M. KUMMEROW (WSBA 21518)

Washington Appellate Project – 91052

1511 Third Avenue, Suite 610

Seattle, WA. 98101

(206) 587-2711

tom@washapp.org

Attorneys for Appellant

**IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION TWO**

STATE OF WASHINGTON,)	
)	
Respondent,)	
)	NO. 50899-1-II
v.)	
)	
PATRICK BELSER,)	
)	
Appellant.)	

DECLARATION OF DOCUMENT FILING AND SERVICE

I, MARIA ARRANZA RILEY, STATE THAT ON THE 20TH DAY OF JUNE, 2018, I CAUSED THE ORIGINAL **OPENING BRIEF OF APPELLANT** TO BE FILED IN THE COURT OF APPEALS - **DIVISION TWO** AND A TRUE COPY OF THE SAME TO BE SERVED ON THE FOLLOWING IN THE MANNER INDICATED BELOW:

<input checked="" type="checkbox"/> KRISTINE FOERSTER CLARK COUNTY PROSECUTOR'S OFFICE [prosecutor@clark.wa.gov] PO BOX 5000 VANCOUVER, WA 98666-5000	() () (X)	U.S. MAIL HAND DELIVERY E-SERVICE VIA PORTAL
<input checked="" type="checkbox"/> PATRICK BELSER 400966 COYOTE RIDGE CORRECTIONS CENTER PO BOX 769 CONNELL, WA 99326	(X) () ()	U.S. MAIL HAND DELIVERY _____

SIGNED IN SEATTLE, WASHINGTON THIS 20TH DAY OF JUNE, 2018.

X _____ *grul*

Washington Appellate Project
1511 Third Avenue, Suite 610
Seattle, Washington 98101
Phone (206) 587-2711
Fax (206) 587-2710

WASHINGTON APPELLATE PROJECT

June 20, 2018 - 4:20 PM

Transmittal Information

Filed with Court: Court of Appeals Division II
Appellate Court Case Number: 50899-1
Appellate Court Case Title: State of Washington, Respondent v Patrick Michael Belser, Appellant
Superior Court Case Number: 15-1-02401-9

The following documents have been uploaded:

- 508991_Briefs_20180620161859D2126818_1853.pdf
This File Contains:
Briefs - Appellants
The Original File Name was washapp.062018-04.pdf

A copy of the uploaded files will be sent to:

- CntyPA.GeneralDelivery@clark.wa.gov
- kristine.foerster@clark.wa.gov

Comments:

Sender Name: MARIA RILEY - Email: maria@washapp.org

Filing on Behalf of: Thomas Michael Kummerow - Email: tom@washapp.org (Alternate Email: wapofficemail@washapp.org)

Address:
1511 3RD AVE STE 701
SEATTLE, WA, 98101
Phone: (206) 587-2711

Note: The Filing Id is 20180620161859D2126818