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NO. 52233-1-II

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

STATE OF WASHINGTON,

Respondent,

v.

JOSEPH STONE,
Appellant.

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

Mason County Cause No. 17-1-00065-5

The Honorable Monty D. Cobb, Judge

BRIEF OF APPELLANT

Skylar T. Brett
Attorney for Appellant

LAW OFFICE OF SKYLAR T. BRETT, PLLC
PO BOX 18084
SEATTLE, WA 98118
(206) 494-0098
skylarbrettlawoffice@gmail.com

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ISSUES AND ASSIGNMENTS OF ERROR

1. The sentencing court violated 42 U.S.C. 407(a) by ordering that “[a] notice of payroll deduction may be issued or other income withholding action may be taken without further notice to the offender, if a monthly court-ordered legal financial obligation payment is not paid...”
2. The sentencing court exceeded its statutory authority by ordering that “[a] notice of payroll deduction may be issued or other income withholding action may be taken without further notice to the offender, if a monthly court-ordered legal financial obligation payment is not paid.”
3. Mr. Stone’s case must be remanded with instructions for the trial court to amend the Judgment and Sentence to clarify that his social security benefits may not be withheld or used in any way for the satisfaction of his LFO debts.

ISSUE 1: The federal Social Security Anti-Attachment statute prohibits a state from seizing a person’s social security payments “by any process of law.” Did the trial court violate the federal statute by ordering that an automatic income withholding action should be taken if Mr. Stone misses a payment on his legal financial obligations when his only source of income is social security disability benefits?

4. The sentencing court violated 42 U.S.C. 407(a) by ordering Mr. Stone to pay a victim penalty assessment.
5. The sentencing court violated 42 U.S.C. 407(a) by ordering Mr. Stone to pay restitution.

ISSUE 2: Federal law prohibits state courts from ordering a defendant to pay legal financial obligations if his/her only source of income is social security benefits. Did the sentencing court violate the social security anti-attachment statute by ordering Mr. Stone to pay a victim penalty assessment and restitution when his only income comes from social security disability payments?

6. The sentencing court violated 42 U.S.C. 407(a) by ordering Mr. Stone to pay the cost of his community supervision.
7. The sentencing court violated RCW 9.94A.703(2)(d) by ordering Mr. Stone to pay the cost of his community supervision.

ISSUE 3: Indigent defendants – and those whose sole source of income is social security benefits – may not be required to pay discretionary legal financial obligations. Did the trial court err by ordering Mr. Stone to pay a “community placement fee” when he is indigent and survives solely on his social security disability payments?

8. The sentencing court exceeded its statutory authority by ordering Mr. Stone to refrain from possession of “any mind or mood-altering substances.”
9. The sentencing court violated RCW 9.94A.703(3)(f) by ordering Mr. Stone to refrain from possession of “any mind or mood-altering substances.”
10. The sentencing court exceeded its statutory authority by ordering Mr. Stone to submit to urinalysis or breathalyzer testing.
11. The sentencing court violated RCW 9.94A.703(3)(d) by ordering Mr. Stone to submit to urinalysis or breathalyzer testing.
12. The sentencing court violated RCW 9.94A.607(1) by ordering Mr. Stone to submit to urinalysis or breathalyzer testing.
13. The sentencing court violated RCW 9.94A.703(3)(c) by ordering Mr. Stone to submit to urinalysis or breathalyzer testing.

ISSUE 4: A sentencing court may only condition a community custody term upon prohibitions and treatment-related requirements related to substance abuse if it first finds that a chemical dependency has contributed to the offense. Did the trial court exceed its authority by ordering Mr. Stone to refrain from possession or use of “any mind or mood-altering substances” and to submit to urinalysis and breathalyzer testing when there was no evidence that any kind of substance abuse was involved in his offenses?

STATEMENT OF FACTS AND PRIOR PROCEEDINGS

Joseph Stone is thirty-three years old. CP 19. His only source of income is in the form social security disability benefits, for which he is eligible because of his significant mental health and cognitive issues. *See* CP 19-28, 34-41; RP 196.

When Mr. Stone was charged with burglary and third-degree assault, the trial court became aware of his mental health struggles during a yearlong process involving a finding of incompetence and then competency restoration through significant doses of antipsychotic medication. *See* CP 4-70, 93-94; RP 1-28 Mr. Stone was eventually convicted of the charges at trial. RP 189.

At sentencing, defense counsel reminded the court that Mr. Stone's only source of income is his social security disability benefits. RP 196. Counsel told the court that Mr. Stone will never be able to pay any legal financial obligations (LFOs). RP 196. Counsel objected to the imposition of any LFOs, including those that are mandatory under statute. RP 196.

The trial court found Mr. Stone indigent at both the beginning and the end of proceedings in superior court. CP 3, 151-52. Even so, the court ordered him to pay a \$500 victim penalty assessment and restitution, the amount of which would be determined at a later hearing. CP 139. The

court also required Mr. Stone to pay a “community placement fee” as a condition of his community custody. CP 146.

The trial court also ordered that:

A notice of payroll deduction may be issued or other income withholding action may be taken without further notice to the offender, if a monthly court-ordered legal financial obligation payment is not paid when due and an amount equal to or greater than the amount payable for one month is owed.
CP 146.

Finally, the sentencing court prohibited Mr. Stone from possessing or consuming “any mind or mood-altering substances,” including marijuana. CP 145. The court also conditioned Mr. Stone’s community custody on the requirement that he, “at [his] own expense, submit to urinalysis and/or breathalyzer testing at the request of the [Community Custody Officer] [(JCCO)] or treatment provider to verify compliance.” CP 146.

This timely appeal follows. CP 153.

ARGUMENT

I. BECAUSE MR. STONE’S ONLY SOURCE OF INCOME IS HIS SOCIAL SECURITY DISABILITY BENEFITS, THE TRIAL COURT WAS PROHIBITED FROM ORDERING ATTACHMENT OF HIS INCOME – WITHOUT ANY NOTICE – IF HE MISSES A MONTHLY LFO PAYMENT.

Because of his significant mental health and cognitive issues, Mr. Stone’s only source of income is his Social Security Disability benefits.

RP 196. Even so, the sentencing court ordered the following as a condition of Mr. Stone's community custody:

A notice of payroll deduction may be issued or other income withholding action may be taken without further notice to the offender, if a monthly court-ordered legal financial obligation payment is not paid when due and an amount equal to or greater than the amount payable for one month is owed.
CP 146.

Because federal law prohibits the attachment of social security payments by any process of law, the court's order permitting "income withholding action" against Mr. Stone's benefits must be stricken from his Judgment and Sentence. 42 U.S.C. 407(a); *State v. Catling*, 2 Wn. App. 2d 819, 823, 413 P.3d 27 (2018), *review granted in part*, 191 Wn.2d 1001, 422 P.3d 915 (2018).¹

The federal social security anti-attachment statute provides that:

The right of any person to any future payment under this subchapter shall not be transferable or assignable, at law or in equity, and none of the moneys paid or payable or rights existing under this subchapter shall be subject to execution, levy, attachment, garnishment, or other legal process, or to the operation of any bankruptcy or insolvency law.

¹ Defense counsel objected at Mr. Stone's sentencing hearing to the imposition of any LFOs because Mr. Stone's only source of income came from his social security benefits and because he would never be able to make any payments. RP 196. This issue is preserved for review.

Furthermore, the Washington Supreme Court has repeatedly exercised its discretion to review issues related to the improper imposition of legal financial obligations based on the significant burden the practice places on indigent defendants and the difficulty it poses to successful reentry to society. *State v. Duncan*, 185 Wn.2d 430, 437-38, 374 P.3d 83 (2016); *State v. Blazina*, 182 Wn.2d 827, 835-37, P.3d 680, 685 (2015). This court should follow the Supreme Court's lead and address this issue in Mr. Stone's case, even if it is determined not to have been properly preserved.

42 U.S.C. § 407(a); *See also Catling*, 2 Wn. App. 2d at 823.

Under that statute, “neither current nor future social security payments are subject to seizure by any process of law.” *Id.* at 823 (*citing Wash. State Dep't of Soc. & Health Srvs. v. Guardianship Estate of Danny Keffeler*, 537 U.S. 371, 123 S.Ct. 1017, 154 L.Ed. 2d 972 (2003)).

The majority opinion in *Catling* holds that, while a person receiving social security benefits as his/her sole source of income may be required to periodically appear before the court to account for whether other assets or income can be used to pay Legal Financial Obligations (LFOs), that court would violate the federal anti-attachment statute by enforcing an order to pay LFOs against his/her social security income. *Id.* at 826.

Accordingly, the *Catling* court remanded that case to the superior court in order to amend the Judgment and Sentence to clarify that the LFOs ordered in that case could not be satisfied out of the offender's social security benefits. *Id.*

In Mr. Stone's case, the sentencing court required attachment of Mr. Stone's income *without any further notice to Mr. Stone*, if he misses a single monthly LFO payment. CP 146. Accordingly, the court's order goes far beyond requiring Mr. Stone to periodically demonstrate to the court

that he has no other attachable assets or income, as held permissible in *Catling*. Rather, the order requires indiscriminate withholding of Mr. Stone's income with no notice (or opportunity to be heard) at all. CP 146.

Mr. Stone's case must be remanded and with instructions for the trial court to amend the Judgment and Sentence to clarify that his social security benefits may not be withheld or used in any way for satisfaction of his LFO debts. *Id.*

II. IN THE ALTERNATIVE, THE FEDERAL SOCIAL SECURITY ANTI-ATTACHMENT STATUTE PROHIBITED THE TRIAL COURT FROM IMPOSING ANY LFOs ON MR. STONE BECAUSE HIS ONLY INCOME COMES IN THE FORM OF SOCIAL SECURITY DISABILITY BENEFITS.

The Social Security Act "provides benefits to a person with a disability so severe that he is 'unable to do [his] previous work' and 'cannot...engage in any other kind of substantial gainful work which exists in the national economy.'" *Keffler*, 537 U.S. 371 (referencing 42 U.S.C. 423(d)(2)(a)). These benefits provide a means of living for people with disabilities so serious they may result in, or persist until, death. 42 U.S.C. 1382.

To ensure that a social security recipient maintains the resources necessary to meet his/her most basic needs, Congress enacted a provision of the Social Security Act to protect these funds. *U.S. v. Devall*, 704 F.2d 1513, 1516 (11th Cir. 1983). The anti-attachment provision of the Social

Security Act prohibits individuals and other entities – including states -- from using a legal process to reach a social security recipient's social security funds. 42 U.S.C. 407(a); *Philpott v. Essex County Welfare Bd.*, 409 U.S. 413, 93 S. Ct. 590, 34 L. Ed. 2d 608 (1973).

Here, the state possesses an enforceable claim against Mr. Stone that can only be satisfied with his social security income. RP 196. Moreover, the State used a judicial action to obtain this claim through a sentencing hearing. The (1) mechanism used to obtain this claim; and (2) fact that the claim can only be satisfied with Mr. Stone's social security income renders the court's order commanding Mr. Stone's to pay mandatory LFOs an "legal process" under 42 U.S.C. 407(a), in violation of the anti-attachment statute. *Washington State Dep't of Social & Health Services v. Guardianship Estate of Keffeler*. 537 U.S. 371, 385, 123 S. Ct. 1017, 154 L. Ed. 2d 972 (2003).

The Washington Supreme Court has held that "federal law prohibits courts from ordering defendants to pay LFOs if the person's only source of income is social security disability." *City of Richland v. Wakefield*, 186 Wn.2d 596, 609, 380 P.3d 459, 466 (2016). This is because the order legally requires the person to pay LFOs out of his/her social security income. *Id.*

The only material difference between Mr. Stone’s case and *Wakefield* is that, in *Wakefield*, the petitioner only challenged her discretionary LFOs while Mr. Stone challenges his mandatory LFOs. This Supreme Court’s holding and reasoning, however, remain the same. Like the petitioner in *Wakefield*, Mr. Stone’s only source of income is from social security. RP 196. And, like the petitioner in *Wakefield*, the only way Mr. Stone can satisfy the court's order is by making payments out of his social security income. Thus, the court order requiring Mr. Stone to pay mandatory LFOs is “other legal process,” which is contrary to the anti-attachment provision of the Social Security Act.²

As discussed in detail in Judge Fearing’s dissent in *Catling*, even absent actual garnishment of a person’s social security check, an order requiring one whose sole source of income derives from social security to pay LFOs of any sort legally requires him/her to pay those sums from his/her social security income in order to enjoy the benefits of citizenship available to all offenders with other sources of income. *See Catling*, 2 Wn. App. 2d at 831-39 (Fearing, J. dissenting).

² This issue is was rejected by the majority of Division III in *Catling* but is currently pending before the Washington Supreme Court. *See State v. Catling*, 191 Wn.2d 1001, 422 P.3d 915 (2018) (granting review). For the reasons set forth, Mr. Stone urges this court to decline to follow Division III’s decision in *Catling*.

In the alternative, Mr. Stone seeks to preserve this issue pending the Supreme Court’s decision in *Catling*.

First, because mandatory LFOs are not “costs,” they are not subject to remission. *Id.* at 831-32. As a result, a person whose income derives solely from social security will never be able to remit the order for payment and will, accordingly, never be able to fully reenter society without paying those LFOs from his/her social security monies.

Without paying those LFOs from his/her social security income, a recipient of social security benefits will never be able to escape the “[i]nconveniences, burdens, punishments, and denial of rights ensue from a judgment for legal financial obligations, both mandatory and discretionary.” *Id.* at 834. This is because the trial court retains jurisdiction over an offender until all LFO obligations have been satisfied. RCW 9.94A.760(4).

For example, a social security recipient will be subject to contempt charges, required to attend monitoring hearings and continuously prove that social security remains his/her only source of income. *Id.* at 835. S/he will also have increased difficulty reentering society, including added burdens to obtaining employment and housing. *Id.* (citing *State v. Blazina*, 182 Wash.2d 827, 344 P.3d 680 (2015)). S/he will be unable to secure credit or to restore his/her civil rights, including the rights to vote and to bear arms. *Id.* at 836-39.

Unless Mr. Stone pays his LFOs from his social security funds, he will never be able to free himself from the jurisdiction of the court or to fully reenter society. *Id.* Because his only source of income is his social security benefits, the federal social security anti-attachment statute prohibited the trial court from order Mr. Stone to pay any LFOs. *Id.*; *Wakefield*, 186 Wn.2d at 609. The orders for Mr. Stone to pay a \$500 victim assessment and restitution must be stricken from his Judgment and Sentence. *Id.*

III. THE SENTENCING COURT IS NO LONGER PERMITTED TO ORDER MR. STONE – WHO IS INDIGENT -- TO PAY A DISCRETIONARY “COMMUNITY PLACEMENT FEE.”

The trial court found Mr. Stone indigent at both the beginning and the end of proceedings in Superior Court. CP 3, 151-52. Even so, it ordered him to pay a “community placement fee” as a condition of his community custody. CP 146.

Orders requiring offenders to pay the cost of community custody constitute discretionary LFOs. RCW 9.94A.703(2)(d); *State v. Lundstrom*, No. 49709-3-II, --- Wn. App. ---, 429 P.3d 1116, 1121, n. 3 (November 15, 2018).

As outlined above, the fact that Mr. Stone’s only source of income is his social security benefits prohibited the court from ordering him to pay any discretionary LFOs. *Wakefield*, 186 Wn.2d at 609.

Furthermore, the legislature recently amended the LFO statutes to prohibit a trial court from imposing discretionary LFOs upon any indigent persons. *See* RCW 10.01.160(3). Those amendments apply prospectively to all cases pending on direct appeal. *State v. Ramirez*, No. 95249-3, --- Wn.2d ---, 426 P.3d 714 (September 20, 2018).

Because his only source of income is his social security benefits and because he is indigent, the court was not permitted to require Mr. Stone to pay the discretionary “community placement fee.” *Id.*; *Lundstrom*, 429 P.3d at 1121, n. 3; RCW 10.01.160(3). That order must be stricken from the Judgment and Sentence. *Id.*

IV. THE SENTENCING COURT EXCEEDED ITS AUTHORITY BY ORDERING CONDITIONS OF MR. STONE’S COMMUNITY CUSTODY THAT WERE NEITHER CRIME-RELATED NOR OTHERWISE AUTHORIZED BY STATUTE.

The state did not present any evidence that drug use – of substance abuse of any kind – contributed to Mr. Stone’s convictions. *See RP generally*. Even so, the sentencing court ordered him to refrain from possession of “any mind or mood-altering substances,” including marijuana, as a condition of his sentence. CP 145. The sentencing court also ordered Mr. Stone to submit to “urinalysis and/or breathalyzer testing... to verify compliance.” CP 146.

Because the substance-abuse-related conditions of Mr. Stone's community custody are neither crime-related, nor otherwise permitted by statute, they must be stricken from his Judgment and Sentence. *State v. Warnock*, 174 Wn. App. 608, 611, 299 P.3d 1173 (2013).

The trial court does not have power to impose community custody conditions unless they are authorized by statute. *Id.* Whether a court has imposed a community custody condition beyond the bounds of its authority is reviewed *de novo*. *Id.*

Statute permits a court to order a person on community custody to “comply with any crime-related prohibitions.” RCW 9.94A.703(3)(f). A sentencing court may also require an offender to “perform affirmative conduct reasonably related to the circumstances of the offense, the offender’s risk of reoffending, or the safety of the community.” RCW 9.94A.703(3)(d).

“Crime-related prohibition” is defined as “an order of a court prohibiting conduct that directly relates to the circumstances for which the offender has been convicted.” RCW 9.94A.030(10). 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 philosophy behind the provision for crime-related sentencing conditions is that “persons may be punished for their crimes and they may

be prohibited from doing things which are directly related to their crimes, but they may not be coerced into doing things which are believed to rehabilitate them.” *State v. Cordero*, 170 Wn. App. 351, 373–74, 284 P.3d 773 (2012) (quoting *State v. Riley*, 121 Wn.2d 22, 36-37, 846 P.2d 1365 (1993)).

Similarly, a sentencing court may only condition a community custody term upon completion of a chemical dependency evaluation and compliance with recommended treatment if it first finds that the offender has a chemical dependency that contributed to the offense. RCW 9.94A.607(1); RCW 9.94A.703(3)(c); *State v. Munoz-Rivera*, 190 Wn. App. 870, 892-93, 361 P.3d 182 (2015). A court exceeds its authority by ordering an offender to engage in drug-related “rehabilitative programs” or “affirmative conduct” when there is no evidence that drug use contributed to the underlying offense.

In Mr. Stone’s case, there was no evidence that substance abuse contributed to the offenses. *See RP generally*. Accordingly, the sentencing court exceeded its authority and abused its discretion by ordering him to abstain from possession of “any mind or mood-altering substances” and to submit to urinalysis and/or breathalyzer testing. *Id.* Those conditions must be stricken from Mr. Stone’s Judgment and Sentence.

CONCLUSION

In order to comply with the federal social security anti-attachment statute, Mr. Stone's case must be remanded with instructions for the trial court to amend the Judgment and Sentence to clarify that his social security benefits may not be withheld or used in any way for satisfaction of his LFO obligations. *Id.*

In the alternative, the anti-attachment statute prohibited the sentencing court from ordering Mr. Stone to pay any LFOs because his only source of income is his social security benefits. The orders for Mr. Stone to pay a victim assessment and restitution must be stricken from his Judgment and Sentence.

The sentencing court did not have the authority to order Mr. Stone – who is indigent – to pay the cost of his community supervision. That order must be stricken from the Judgment and Sentence.

The sentencing court exceeded its authority by ordering substance-abuse-related conditions of Mr. Stone's community custody absent any evidence that substance abuse contributed to his offenses. Those conditions must be stricken from Mr. Stone's Judgment and Sentence.

Respectfully submitted on December 10, 2018,



Skylar T. Brett, WSBA No. 45475
Attorney for Appellant

CERTIFICATE OF SERVICE

I certify that on today's date:

I mailed a copy of Appellant's Opening Brief, postage prepaid, to:

Joseph Stone/DOC#337046
Washington Corrections Center
PO Box 900
Shelton, WA 98584

With the permission of the recipient(s), I delivered an electronic version of the brief, using the Court's filing portal, to:

Mason County Prosecuting Attorney
timw@co.mason.wa.us

I filed the Appellant's Opening Brief electronically with the Court of Appeals, Division II, through the Court's online filing system.

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

Signed at Seattle, Washington on December 10, 2018.



Skylar T. Brett, WSBA No. 45475
Attorney for Appellant

LAW OFFICE OF SKYLAR BRETT

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