

FILED
Court of Appeals
Division II
State of Washington
7/30/2019 4:05 PM

NO. 52481-3-II

THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION TWO

STATE OF WASHINGTON,

Respondent

v.

ADRIAN BROUSSARD,

Appellant.

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

REPLY BRIEF OF APPELLANT

TRAVIS STEARNS
Attorney for Appellant

WASHINGTON APPELLATE PROJECT
1511 Third Avenue, Suite 610
Seattle, WA 98101
(206) 587-2711

TABLE OF CONTENTS

TABLE OF CONTENTSi

TABLE OF AUTHORITIESii

A. ARGUMENT IN REPLY 1

1. The complete breakdown in communication between Mr. Broussard and his attorney deprived Mr. Broussard of his right to counsel...... 1

2. The court’s error in refusing to sever Mr. Broussard’s case from that of his co-defendant when they were not alleged to have committed any crimes together deprived Mr. Broussard of his right to a fair trial. 6

3. Allowing the jury to hear evidence of crimes that did not involve Mr. Broussard deprived Mr. Broussard of his right to a fair trial.9

4. The failure to determine whether evidence seized from Mr. Broussard should have been suppressed requires remand for a suppression hearing. 11

5. The charge of possession with the intent to deliver should be dismissed for lack of sufficient evidence. 14

B. CONCLUSION 16

TABLE OF AUTHORITIES

United States Supreme Court

In re Winship, 397 U.S. 358, 90 S. Ct. 1068, 25 L. Ed. 2d 368 (1970).... 14

Jackson v. Virginia, 443 U.S. 307, 99 S. Ct. 2781, 61 L. Ed. 2d 560 (1979) 15

Washington Supreme Court

State v. Arreola, 176 Wn.2d 284, 290 P.3d 983 (2012) 12, 13

State v. Emery, 174 Wn.2d 741, 278 P.3d 653 (2012) 7

State v. Grier, 171 Wn.2d 17, 246 P.3d 1260 (2011)..... 13

State v. Grisby, 97 Wn.2d 493, 647 P.2d 6 (1982)..... 6

State v. Hoffman, 116 Wn.2d 51, 804 P.2d 577 (1991)..... 7

State v. Ladson, 138 Wn.2d 343, 979 P.2d 833 (1999)..... 12, 13

State v. McFarland, 127 Wn.2d 322, 899 P.2d 1251 (1995)..... 8

State v. Robinson, 171 Wn.2d 292, 253 P.3d 84 (2011)..... 13, 14

State v. Smith, 106 Wn.2d 772, 725 P.2d 951 (1986)..... 6, 7, 8, 10

Washington Court of Appeals

State v. Schaller, 143 Wn. App. 258, 177 P.3d 1139 (2007)..... 3

State v. Brown, 68 Wn. App. 480, 843 P.2d 1098 (1993) 14

State v. Bryant, 89 Wn. App. 857, 950 P.2d 1004 (1998) 8

State v. Fualaau, 155 Wn. App. 347, 228 P.3d 771 (2010) 4, 5

<i>State v. Harris</i> , 36 Wn. App. 746, 677 P.2d 202 (1984)	8
<i>State v. Hutchins</i> , 73 Wn. App. 211, 868 P.2d 196 (1994)	15
<i>State v. Lane</i> , 56 Wn. App. 286, 786 P.2d 277 (1989).....	15
<i>State v. McCreven</i> , 170 Wn. App. 444, 284 P.3d 793 (2012)	9
<i>State v. Perez</i> , 5 Wn. App. 2d 867, 428 P.3d 1251 (2018).....	12
<i>State v. Slocum</i> , 183 Wn. App. 438, 333 P.3d 541 (2014)	10, 11
<i>State v. Watkins</i> , 53 Wn. App. 264, 766 P.2d 484 (1989).....	8
<i>State v. Wilson</i> , 144 Wn. App. 166, 181 P.3d 887 (2008).....	11
Decisions of Other Courts	
<i>United States v. Nevils</i> , 598 F.3d 1158 (9th Cir. 2010).....	16
<i>United States v. Nguyen</i> , 262 F.3d 998 (9th Cir. 2001).....	2
Statutes	
RCWA 69.50.401	14
Rules	
CrR 4.4.....	6
Constitutional Provisions	
Const. Art. I, § 7	12
U.S. Const. amend. VI.....	2
U.S. Const. amend. XIV	14

A. ARGUMENT IN REPLY

Mr. Broussard's convictions should be reversed. Mr. Broussard was deprived of his Sixth Amendment right to the effective assistance of counsel by the complete breakdown in communication between him and his lawyer. He was deprived of his right to a fair trial by the court's failure to sever his case from that of his co-defendant. He was also deprived of his right to a fair trial by the improper admission of other act evidence, which focused on the crime committed by Mr. James, who was not a co-defendant in this case.

In addition, this Court should remand to trial court to determine whether the evidence seized from Mr. Broussard at the time of his arrest should be suppressed and order dismissal of the charges of possession of a controlled substance with the intent to deliver because the prosecution failed to present sufficient evidence of all the essential elements of this crime.

1. The complete breakdown in communication between Mr. Broussard and his attorney deprived Mr. Broussard of his right to counsel.

While the prosecutor now argues no remedy was required to correct the breakdown in communication between Mr. Broussard and his attorney, this was not the case at trial. Brief of Respondent at 31. At

trial, the prosecutor recognized the conflict. 4/24/18 RP 8. Indeed, defense counsel told the court the conflict had been growing for some time and the relationship between Mr. Broussard and his attorney, at the time he asked to withdraw, had “**just totally deteriorated.**” 4/23/18 RP 6 (emphasis added). The trial prosecutor argued, at a minimum, that an in-camera hearing should occur where defense counsel could explain why he believed the conflict amounted to a Sixth Amendment violation. 4/24/16 RP 71. This Court should agree with both trial counsel and hold that the total breakdown in communication deprived Mr. Broussard of his Sixth Amendment right to counsel and order a new trial. U.S. Const. amend. VI; *United States v. Nguyen*, 262 F.3d 998, 1003-05 (9th Cir. 2001).

It is rare that defense counsel is as clear as he was in this case. When addressing the conflict issue, defense counsel stated: “Your Honor, I think I stated it as clear as I can. **I do not believe I can effectively represent Mr. Broussard anymore.**” 4/23/18 RP 31 (emphasis added). He continued by telling the court, “I just don’t see how this is going to work going forward, and **I think that is prejudicial and detrimental to Mr. Broussard.**” 4/23/18 RP 32 (emphasis added).

It is also infrequent that the prosecutor joins in the request for, at a minimum, an in-camera hearing to determine the extent of the conflict. 4/24/16 RP 71. But here, the trial prosecutor recognized the seriousness of the conflict, explaining to the court that the communication breakdown was “**essentially creating a conflict of interest**” and the court should either appoint new counsel or give Mr. Broussard time to hire a lawyer. 4/23/18 RP 9.

And while the trial court found this was an intentional decision by Mr. Broussard to not communicate with his attorney, this was never suggested by Mr. Broussard’s lawyer. Instead, he acknowledged that his relationship with Mr. Broussard deteriorated over time, to the point where they could no longer communicate with each other. 4/23/18 RP 20.

Unlike the trial prosecutor, the government now argues there was no conflict or any need to conduct additional investigation, relying on *State v. Schaller*. Brief of Respondent at 28 (citing *Schaller*, 143 Wn. App. 258, 271, 177 P.3d 1139 (2007)). But *Schaller* is legally and factually distinct from Mr. Broussard’s case. In *Schaller*, the court held that a new attorney is not required where a defendant “simply refuses to meet with his attorneys.” 143 Wn. App. at 271. Unlike *Schaller*, Mr.

Broussard never refused to meet with his lawyer. Rather, both he and his lawyer acknowledged the relationship had deteriorated over an extended period of time, to the point where Mr. Broussard's attorney told the court he could no longer effectively represent Mr. Broussard because of their inability to communicate. 4/23/18 RP 32.

Likewise, the prosecution relies on *State v. Fualaau* to argue Mr. Broussard was not entitled to new counsel. Brief of Respondent at 29 (citing *Fualaau*, 155 Wn. App. 347, 359, 228 P.3d 771 (2010)). But in *Fualaau*, the defendant made an intentional and calculated outburst in order to create a conflict of interest and to create a mistrial. *Fualaau*, 155 Wn. App. at 359. In *Fualaau*, the request for new counsel was made in the middle of trial, after Mr. Fualaau assaulted his attorney. *Id.* This Court found the outburst was for two purposes: to force withdrawal and to cause a mistrial. *Id.*

Mr. Broussard's case is very different. Mr. Broussard made his motion for a new attorney before the commencement of trial. 4/23/18 RP 6. He never engaged in any misconduct in order to force the issue. Instead, Mr. Broussard made attempts to hire his own counsel, recognizing the seriousness of the breakdown in communication with his attorney was likely to impact his ability to receive a fair trial.

4/30/18 RP 436. His requests were always respectful and focused on the breakdown in communication, never disrespecting the court or anyone else in the courtroom. Unlike the egregious misconduct described in *Fualaau*, there was no suggestion Mr. Broussard acted in any way to forfeit his right to counsel. *Fualaau*, 155 Wn. App. at 360; *see also* Brief of Respondent at 30.

All of the parties before the court including Mr. Broussard, his attorney, and the prosecutor, recognized the breakdown in communication created conflict of interest, depriving Mr. Broussard of his Sixth Amendment right to the assistance of counsel. 4/23/18 RP 9, 32. There was no suggestion Mr. Broussard's lawyer was disingenuous with the court when he told the court, before trial, of the conflict. Given his experience, it is likely he was able to distinguish between mere disagreement and the breakdown in communication he recognized to be prejudicial and detrimental to Mr. Broussard. 4/23/18 RP 32. Nor was Mr. Broussard a person who could not be satisfied with any attorney. There was no history of serial requests for new lawyers or previous conflicts. This was Mr. Broussard's sole request for a new lawyer.

At the least, the trial court should have held an in-camera hearing to determine the extent of the breakdown in communication, as

suggested by the prosecution. 4/24/16 RP 71. But with the clear statements made by Mr. Broussard and his lawyer that their breakdown in communication deprived Mr. Broussard of his Sixth Amendment rights, this Court should also find the court's error in not providing Mr. Broussard with a new attorney requires reversal of his conviction.

2. The court's error in refusing to sever Mr. Broussard's case from that of his co-defendant when they were not alleged to have committed any crimes together deprived Mr. Broussard of his right to a fair trial.

The prosecution argues the trial court acted within its discretion when it did not grant Mr. Broussard's motion to sever and that Mr. Broussard's trial lawyer was not ineffective when he failed to renew his motion. Brief of Respondent at 32. This Court should instead hold that the trial court's failure to order severance despite trial counsel's failure to renew his motion deprived Mr. Broussard of his right to a fair trial.

A motion for severance should be granted when "necessary to achieve a fair determination of the guilt or innocence of a defendant." *State v. Grisby*, 97 Wn.2d 493, 506, 647 P.2d 6 (1982); CrR 4.4(c)(2). Unlike other cases where severance was not necessary, there was little evidence here to tie the co-defendants together, other than their relationship as half-brothers. The evidence presented against Mr. Broussard and Mr. Smith was entirely independent. They were not

alleged to have committed any crimes together. Thus, the traditional rationales for trying cases together did not apply. *See, e.g., State v. Hoffman*, 116 Wn.2d 51, 74, 804 P.2d 577 (1991). Instead, the primary reason for trying Mr. Broussard with Mr. Smith was to connect both of them to Mr. James, whose crimes, while similar to those charged against Mr. Broussard and Mr. James, were factually distinct.

To a large degree, the prosecution recognizes that the evidence presented at trial against the Mr. Broussard and Mr. Smith was unrelated, describing the evidence as compartmentalized and distinct in its brief. Brief of Respondent at 35. But this belies the problem and the reason why the severance motion should have been granted. There was almost no cross-admissibility between the acts Mr. Broussard was accused of committing and those committed by Mr. Smith. They did not commit any crimes together. The only purpose of trying them together was to demonstrate propensity and to tie them to Mr. James, who had committed many crimes unrelated to either of his half-brothers.

This case is not like other cases where the co-defendants are alleged to have committed acts together, or even in concert. *See e.g., State v. Emery*, 174 Wn.2d 741, 752, 278 P.3d 653 (2012). The charges

against Mr. Broussard and Mr. Smith were separate and distinct from each other, eliminating the reasons for why they should have been tried together.

Allowing the jury to hear about unrelated acts committed by either Mr. Smith or Mr. James made it impossible for the jury to separate the evidence of their bad acts from crimes Mr. Broussard was accused of committing. *State v. Bryant*, 89 Wn. App. 857, 865, 950 P.2d 1004 (1998); *State v. Harris*, 36 Wn. App. 746, 750, 677 P.2d 202 (1984). In addition, the gross disparity of the evidence presented of crimes Mr. James committed, who was not a co-defendant, exacerbated this problem. *State v. Watkins*, 53 Wn. App. 264, 268, 766 P.2d 484 (1989).

It was an abuse of discretion to deny Mr. Broussard's motion for severance. The failure of defense counsel to renew his argument for severance cannot be viewed as strategic and there is a reasonable probability that but for counsel's error, the result of the proceeding would have been different. *State v. McFarland*, 127 Wn.2d 322, 335, 899 P.2d 1251 (1995). This Court should find that the trial court abused its discretion when it failed to sever Mr. Broussard's charges from those of Mr. Smith and order a new trial.

3. Allowing the jury to hear evidence of crimes that did not involve Mr. Broussard deprived Mr. Broussard of his right to a fair trial.

The prosecution argues that the uncharged acts related to Mr. James' crimes should have been admitted because they were intertwined with Mr. Broussard's actions and highly probative of his knowledge. Brief of Respondent at 36. This Court should instead hold that Mr. Broussard was deprived of his right to a fair trial when the court allowed the jury to hear of the crimes committed by Mr. James, none of which Mr. Broussard was alleged to have been a co-conspirator in, either as a principal or accomplice.

The prosecutor's principle argument is that because Mr. Broussard was charged as a principle or an accomplice in the charged crimes, that it was proper to allow the jury to hear about uncharged crimes committed by another person. Brief of Respondent at 37. This is contrary to this Court's prior rulings, where this Court has consistently recognized that prior act evidence is "presumptively inadmissible." *State v. McCreven*, 170 Wn. App. 444, 458, 284 P.3d 793 (2012). Likewise, Washington's Supreme Court recognizes that when a jury hears other act evidence, there is a risk that it will result in prejudice

and the denial of a fair trial. *State v. Smith*, 106 Wn.2d 772, 774, 725 P.2d 951 (1986). Such was the case here.

Not only was the evidence presented at Mr. Broussard's trial largely about Mr. James' bad deeds, but so was much of the prosecution's argument. In both the opening statement and closing argument, the prosecution focused on Mr. James. 4/30/18 RP 440; 5/14/18 RP 1221. Certainly, there was substantial evidence Mr. James committed a number of crimes. He had, after all, pled guilty to them. But focusing on crimes that were not relevant and that were highly prejudicial deprived Mr. Broussard of his right to a fair trial. Most of the evidence about the financial crimes had nothing to do with Mr. Broussard. 4/30/18 RP 477, 490, 504, 536. But, by focusing on the crimes Mr. James committed, the prosecution made it appear that Mr. Broussard was involved in a large scale plan to commit fraud, prejudicing him and preventing him from receiving a fair trial on the facts of his case.

This Court should find Mr. Broussard was found guilty not on the strength of the evidence supporting the charges he faced, but on the jury's over-reliance on propensity evidence. *State v. Slocum*, 183 Wn. App. 438, 442, 333 P.3d 541 (2014). Because of the blood tie with Mr.

James, it made it even more unlikely the jury could be able to separate Mr. Broussard's acts from those of his half-brother, even though there was very little to connect the men together.

The decision to allow the jury to hear of the crimes committed by Mr. James prevented Mr. Broussard from receiving a fair trial. This Court should find the trial court was "manifestly unreasonable or exercised on untenable grounds or for untenable reasons." *Slocum*, 183 Wn. App. at 448. Without the evidence of Mr. James' misdeeds, there was little to establish Mr. Broussard committed the charged crimes. Because the balance must be tipped in the favor of the defense in close cases, this Court should reverse Mr. Broussard's convictions and order a new trial. *State v. Wilson*, 144 Wn. App. 166, 177, 181 P.3d 887 (2008).

4. The failure to determine whether evidence seized from Mr. Broussard should have been suppressed requires remand for a suppression hearing.

It is true that no suppression hearing was held and the prosecution is correct that there is insufficient evidence to find that the evidence seized from Mr. Broussard should be suppressed without a hearing. Brief of Respondent at 40. But the reason for the lack of a hearing was the failure of defense counsel to move for suppression.

And because there was testimony at the trial to suggest the seizure of evidence from Mr. Broussard does not satisfy an exception to the right to be free from warrantless seizures, this Court should remand this matter for a suppression hearing.

There is indication the police lacked sufficient cause to stop and search Mr. Broussard. 4/24/18 RP 74, 5/1/18 RP 721-22. Because the issue was not litigated, the record is limited. It appears, however, that the stop of Mr. Broussard's vehicle was pre-textual, which is unconstitutional under the privacy provisions of Washington's constitution. Const. Art. I, § 7; *State v. Arreola*, 176 Wn.2d 284, 288, 290 P.3d 983 (2012); *State v. Ladson*, 138 Wn.2d 343, 349, 979 P.2d 833 (1999). There is also the potential that the officer lacked other cause to arrest Mr. Broussard, as there was no suggestion the arresting officer was acting on anything other than a bulletin, which may have been insufficient under the fellow officer rule. *State v. Perez*, 5 Wn. App. 2d 867, 873, 428 P.3d 1251 (2018).

The prosecution argues that this Court should not rely on *State v. Robinson* to find that a hearing can be granted under these circumstances. Brief of Respondent at 43. It is true that *Robinson* addresses the procedures that should be followed when there has been a

change in the law. *State v. Robinson*, 171 Wn.2d 292, 306, 253 P.3d 84 (2011). But *Robinson* should not be read so restrictively. There is nothing to suggest that the failure of Mr. Broussard's attorney to provide effective assistance of counsel should change the rule articulated in *Robinson*. This is especially true here, where Mr. Broussard's attorney articulated his concern that he was not providing effective assistance to his client. 4/23/18 RP 31. Had the trial court appointed new counsel, it is likely they would have identified this error and moved to suppress the seized evidence. But because Mr. Broussard's attorney, by his own words, was failing to provide effective assistance to Mr. Broussard, he failed to identify this issue. This should not be held against Mr. Broussard.

No legitimate strategy existed to justify the failure to move to suppress and Mr. Broussard's attorney's performance fell below an objective standard of reasonableness. *State v. Grier*, 171 Wn.2d 17, 33, 246 P.3d 1260 (2011). There is evidence to suggest the search did not meet an exception to the warrant requirement and that a court may have suppressed the evidence found on Mr. Broussard, had a hearing been held. *Arreola*, 176 Wn.2d at 288; *Ladson*, 138 Wn.2d at 349. This error requires remand for a suppression hearing, where the court can

determine whether the evidence should have been suppressed.

Robinson, 171 Wn.2d at 90-91.

5. The charge of possession with the intent to deliver should be dismissed for lack of sufficient evidence.

The government finally argues there was sufficient evidence of possession of a controlled substance with the intent to deliver, asking this Court to affirm Mr. Broussard's conviction. Brief of Respondent at 43. Because the government failed to present sufficient evidence of an intent to deliver, this charge should be dismissed.

Dismissal of a charged crime is required where the government presents insufficient evidence of all of the elements required to prove the offense. *In re Winship*, 397 U.S. 358, 364, 90 S. Ct. 1068, 25 L. Ed. 2d 368 (1970); U.S. Const. amend. XIV.

Intent is an essential element of the crime of possession of a controlled substance with the intent to deliver. RCWA 69.50.401(1). This Court has dismissed charges where the prosecution is only able to prove possession, where it is unable to establish other facts and circumstances needed to establish intent to deliver. *State v. Brown*, 68 Wn. App. 480, 483, 843 P.2d 1098 (1993). Likewise, this Court has held that an "officer's opinion of the quantity of a controlled substance normal for personal use" is insufficient to establish intent to deliver.

State v. Hutchins, 73 Wn. App. 211, 217, 868 P.2d 196 (1994).

Evidence regarding profit is similarly insufficient. *Id.* at 215.

The evidence the government used to prove Mr. Broussard committed this crime was based on the testimony of an officer who had previously worked in narcotics. 5/10/18 RP 1038. He gave his opinion that Mr. Broussard had an intent to deliver, but could point to little to support that opinion that this Court has found to be necessary to prove intent. No money was found on Mr. Broussard, nor any other indicia of delivery. There were no scales, ledgers, or anything else to suggest that he intended to sell the drugs found on him to anybody else. *Cf.*, *State v. Lane*, 56 Wn. App. 286, 298, 786 P.2d 277 (1989). There is no evidence Mr. Broussard intended to deliver the controlled substances, only evidence he possessed a quantity of drugs that he could have sold. 5/10/18 RP 1055. This distinction is critical, as evidence a drug could be sold is not sufficient to establish intent to deliver and is only sufficient to establish simple possession. *Hutchins*, 73 Wn. App. at 217.

In examining sufficiency, reasonable inferences are construed in favor of the prosecution, but they may not rest on speculation. *Jackson v. Virginia*, 443 U.S. 307, 319, 99 S. Ct. 2781, 61 L. Ed. 2d 560 (1979). Evidence is insufficient to support a verdict where “mere speculation,

rather than reasonable inference, supports the government's case.”
United States v. Nevils, 598 F.3d 1158, 1167 (9th Cir. 2010). The prosecution may have presented enough evidence to speculate Mr. Broussard intended to deliver a controlled substance, but this is not enough to provide the reasonable inference required for sufficiency. *Jackson*, 443 U.S. at 319. This Court should find the prosecution failed to establish possession with the intent to deliver and dismiss the two counts of possession with intent to deliver.

B. CONCLUSION

This Court should order a new trial because Mr. Broussard was deprived of his Sixth Amendment right to effective assistance of counsel. A new trial is also required because of the court's error in failing to sever Mr. Broussard's case from that of his co-defendant. At his new trial, this Court should order that evidence of Mr. James' crimes should be excluded.

In addition, this Court should dismiss the two charges of possession of a controlled substance with the intent to deliver because the prosecution presented insufficient evidence of intent. In the alternative, a hearing should be held to determine whether the evidence seized from Mr. Broussard when he was arrested should be suppressed.

DATED this 30th day of July, 2019.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'T. Stearns', with a long horizontal flourish extending to the right.

TRAVIS STEARNS (WSBA 29935)
Washington Appellate Project (91052)
Attorneys for Appellant

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

STATE OF WASHINGTON,)	
)	
Respondent,)	
)	
v.)	NO. 52481-3-II
)	
ADRIAN BROUSSARD,)	
)	
Appellant.)	

DECLARATION OF DOCUMENT FILING AND SERVICE

I, MARIA ARRANZA RILEY, STATE THAT ON THE 30TH DAY OF JULY, 2019, I CAUSED THE ORIGINAL **REPLY 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"/> PIERCE COUNTY PROSECUTOR'S OFFICE [PCpatcecf@co.pierce.wa.us] 930 TACOMA AVENUE S, ROOM 946 TACOMA, WA 98402-2171	() () (X)	U.S. MAIL HAND DELIVERY E-SERVICE VIA PORTAL
<input checked="" type="checkbox"/> JEREMY MORRIS, SPECIAL DPA [jeremy@glissonmorris.com] GLISSON & MORRIS 623 DWIGHT ST PORT ORCHARD WA 98366-4619	() () (X)	U.S. MAIL HAND DELIVERY E-SERVICE VIA PORTAL
<input checked="" type="checkbox"/> ADRIAN BROUSSARD 342698 OLYMPIC CORRECTIONS CENTER 11235 HOH MAINLINE FORKS, WA 98331	(X) () ()	U.S. MAIL HAND DELIVERY _____

SIGNED IN SEATTLE, WASHINGTON THIS 30TH DAY OF JULY, 2019.



X _____

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

WASHINGTON APPELLATE PROJECT

July 30, 2019 - 4:05 PM

Transmittal Information

Filed with Court: Court of Appeals Division II
Appellate Court Case Number: 52481-3
Appellate Court Case Title: State of Washington, Respondent v. Adrian Tubis Broussard, Appellant
Superior Court Case Number: 16-1-03551-7

The following documents have been uploaded:

- 524813_Briefs_20190730160444D2712756_3326.pdf
This File Contains:
Briefs - Appellants Reply
The Original File Name was washapp.073019-01.pdf

A copy of the uploaded files will be sent to:

- PCpatcecf@co.pierce.wa.us
- jeremy@glissonmorris.com

Comments:

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

Filing on Behalf of: Travis Stearns - Email: travis@washapp.org (Alternate Email: wapofficemail@washapp.org)

Address:
1511 3RD AVE STE 610
SEATTLE, WA, 98101
Phone: (206) 587-2711

Note: The Filing Id is 20190730160444D2712756