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Division II
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No. 54404-1-II

IN THE COURT OF APPEALS, DIVISION II
OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

vs.

SHASTA RAYE CONNER,

Appellant.

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

The Honorable Suzan L. Clark, Judge

Clark County Superior Court Cause No. 17-1-01039-1

APPELLANT'S OPENING BRIEF

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INTRODUCTION

On January 27, 2017, Shasta Conner was arrested following a brief law enforcement investigation consisting of information provided by two criminal informants four months apart. Following Ms. Conner's arrest, law enforcement obtained a search warrant to search her purse, cell phone and vehicle, and found drugs, cash, "drug notes" and text messages. Probable cause for the search warrant was based solely upon information provided the by two informants and the actions of a drug sniffing dog which alerted to the back of her vehicle. The two criminal informants were Robert Carter and Ian Lawhead, with Carter providing information on September 15, 2016 and Lawhead providing information on January 13, 2017.

ISSUE AND ASSIGNMENT OF ERROR

Assignment of Error.

The trial court erred when it denied Ms. Conner's motion to suppress.

Issue

Whether the Court erred by denying Ms. Conner's motion to suppress evidence seized as a result of an illegal search.

STATEMENT OF THE CASE

INFORMANT CARTER:

On September 15, 2016, Robert Carter, who was on probation at the time, was arrested when a DOC officer searched his vehicle and found a stolen handgun and a large quantity of pre-packaged methamphetamine. ¹CP 43, Page 14. Carter was interrogated and agreed to provide information to law-enforcement in exchange for a “positive recommendation on the pending criminal charges“. During the interrogation, Carter claimed that a person named Shasta Conner “was” his heroin supplier. He further claimed that Shasta Conner dealt in quantities from an ounce up to a pound in the Clark County area and that he and she had plans to deal multiple pounds of heroin in the Clark County area. He does not, however, state when she was his supplier. From Jail, Carter was directed by law-enforcement to make phone calls to Shasta Conner during which phone calls he attempted to have her meet with one of his friends to sell his friend drugs. Shasta Conner refused and the investigation went no further.

As for Carter’s track record with police, the record includes no information indicating that Carter had ever provided any information to

¹ All facts contained in this section regarding Carter are taken from CP 43, Page 14. For ease of reading, no further references will be made in this section.

law-enforcement in the past, reliable or otherwise, and no information given by Carter was ever corroborated by law-enforcement.

Carter also had “an extensive criminal history to include felony and misdemeanor convictions for: Possession of Controlled Substances, Unlawful Possession of Firearms, Possession of Stolen Property II, Bail Jump, Residential Burglary, Burglary II, Felony Malicious Mischief and misdemeanor offenses for Violation of a Domestic Violence Order, Reckless Endangerment, Driving While Suspended and Assault IV”.

INFORMANT LAWHEAD:

On January 26, 2017, Ian Lawhead, who was also on probation at the time, was arrested by detectives at the request of DOC officer Campbell on a felony fugitive escape warrant. CP 43, Page 19. Once in jail, Lawhead was interrogated and disclosed that when he was arrested, he was on his way to purchase heroin. CP 43, Page 19, 20. When asked, Lawhead stated that he was going to buy heroin from a person “he knows as Shasta”. Id. He gave no last name to “Shasta”.

Lawhead said that he had last purchased heroin from “Shasta” approximately three days earlier. Id. Lawhead said that when last purchasing drugs from her, he met Shasta at a location that he could not recall, that she was driving a “black Maxima” — the only vehicle he had ever seen her driving — and that she had a portable safe with her. Id. He

went on to say that he had purchased heroin from “Shasta” two times within the prior seven days. He also said, without further detail, that Shasta was “sitting on about 5 ounces right now, but [was] planning on picking up 20 ounces soon“. Id.

At the direction of law-enforcement, Lawhead showed text messages between him and a person he claimed was Shasta, and spoke to her on the telephone. CP 43, Page 21. The text messages between him and the person he called Shasta appeared to be a conversation involving drug transactions. Id. Lawhead was shown a picture selected by police and Lawhead agreed that it was “Shasta“. Id.

During the text conversation with “Shasta“, Lawhead asked to meet Shasta at her house and she refused texting, “I don’t do deals at my house“. CP 43, Page 25. One of the police officers was near Lawhead and could overhear the call somewhat. CP 43, Page 15. During the text conversation, Shasta told Lawhead that she would get ahold of him in about an hour. Id.

There is no information provided indicating that Lawhead had provided any information to law-enforcement in the past.

Lawhead’s criminal history included “arrests for Unauthorized Use of a Motor Vehicle, Possession of a Stolen Vehicle, Hit and Run and Criminal Mischief II, all in in Oregon. Id. He further had convictions in

Washington State for Possession of Controlled Substances, Assault IV, Malicious Mischief III, Violation of Domestic Violence Court Orders, Attempted Tampering with a Witness, Vehicle Prowling II, Reckless Driving and other misdemeanor offenses.“ Id.

POLICE CONTACT WITH CONNER:

On January 27, 2017, following their interrogation of Lawhead, three police officers traveled to Defendant, Shasta Conner’s home to wait for her. Ms. Conner arrived home in her “Black Altima” sometime later and was approached by the police. CP 43, Page 16. When asked if there was “anything” in her vehicle, Shasta responded that she did not know. Id. When police told her that they were investigating her for dealing drugs, she denied consent to search the vehicle and indicated to police that she did not know what they were talking about. Police noted that Ms. Conner nodded her head when being told that they had more than one source of information about her selling drugs, and that she also nodded her head when the officer told her that he was going to have a “drug dog run around her vehicle”. Id. The officer characterized the nodding to both statements as “affirmations”.

THE ARREST:

Ms. Conner at this time was handcuffed and given Miranda warnings. *Id.* The drug-sniffing dog then circled Ms. Conner's vehicle and gave a "final alert" around the trunk area of the vehicle. *Id.*

Following Ms. Conner's arrest, police obtained a search warrant for her vehicle, Ms. Conner's purse and phone were seized before the drug-sniffing dog alerted, and drugs, cash and "Drug notes" were seized from the resulting search. CP 43, Pages 27, 31.

Ms. Conner was ultimately found guilty following a bench trial held on October 20, 2019. CP 181, Page 1. She was sentenced to 36 months in prison. CP 181, Page 3. Ms. Conner did not testify and did not offer any evidence at the trial. RP 1-112.

Mrs. Conner now appeals the court's denial of her motion to suppress.

ARGUMENT

There was no probable cause to issue the search warrant.

Article I, section 7 of the Washington State Constitution mandates that "[n]o person shall be disturbed in his private affairs, or his home invaded, without authority of law." *State v. Pippin*, 200 Wn.App. 826, 403 P.3d 907, (Div. 2 2017).

Article I, section 7 focuses on protecting "those privacy interests which citizens of this state have held, and should be entitled to hold, safe

from governmental trespass absent a warrant.'" *State v. Young*, 123 Wn.2d 173, 181, 867 P.2d 593 (1994) (quoting *State v. Myrick*, 102 Wn.2d 506, 511, 688 P.2d 151 (1984)). See also *State v. Pippin*, 200 Wn.App. 826, 403 P.3d 907, (Div. 2 2017).

A warrantless seizure is per se unreasonable under the Fourth Amendment to the United States Constitution and Article I, Section 7 of the Washington State Constitution. *State v. Williams*, 102 Wn.2d 733, 736, 689 P.2d 1065 (1984), *State v. Cram*, 32152-5-III (unpublished)(2014).

The issuance of a search warrant must be based on probable cause. "Probable cause requires more than suspicion or conjecture, but it does not require certainty." *State v. Chenoweth*, 160 Wn.2d at 476.

The affidavit in support of a search warrant application must "set forth sufficient facts to convince a reasonable person of the probability the defendant is engaged in criminal activity and that evidence of criminal activity can be found at the place to be searched. "The [issuing court] is entitled to make reasonable inferences from the facts and circumstances set out in the affidavit." *State v. Maddox*, 152 Wn.2d 499, 505, 98 P.3d 1199 (2004); *State v. Stewart*, 9 Wn.App.2d 1035, 51286-6-II.

Moreover, it is well established that article I, section 7 of the Washington State Constitution provides greater protections than does the

federal constitution." *State v. Athan*, 160 Wn.2d 354, 365, 158 P.3d 27 (2007), *State v. Pippin*, 200 Wn.App. 826, 403 P.3d 907, (Div. 2 2017).

Innocuous facts alone, set forth in an affidavit for a search warrant, do not justify a finding of probable cause. *State v. Weyand*, 188 Wn.2d 804, 399 P.3d 530, (2017).

Alerts of a drug-sniffing dog around a vehicle, in the absence of a legitimate traffic stop, are illegal may not serve as probable cause for a search warrant. *Illinois v. Caballes*, 543 U.S. 405, 125 S.Ct. 834, 160 L.Ed.2d 842, 73 U.S.L.W. 4111 (2005).

The information provided to a magistrate when a warrant is requested must also be current enough to support a belief that the criminal conduct being alleged is still ongoing, and information which is not sufficiently current is said to be stale and not able to support a finding of probable cause. *State v. Maddox*, 152 Wn.2d 499, 506, 98 P.3d 1199 (2004).

In reviewing the issue of staleness in a probable cause determination, the reviewing court considers the information presented to the issuing magistrate and looks to the totality of the circumstances to evaluate whether the facts underlying the search warrant are stale. *Maddox*, at 506.

Information is not stale "if the facts and circumstances in the affidavit support a commonsense determination that there is continuing and contemporaneous possession of the property intended to be seized." *Maddox*, 152 Wn.2d at 506. See also *State v. Bohannon*, 62 Wn.App. 462, 470, 814 P.2d 694 (1991) (the test for staleness is a commonsense one to determine if the facts are adequate to support a conclusion by a neutral magistrate that the evidence sought is still located on the premises). *Id.*

In evaluating staleness, the length of time between the information obtained and when the warrant is sought is only one factor to be considered along with other relevant circumstances, including the type of criminal activity suspected. See *Maddox*, 152 Wn.2d at 506 (setting forth the majority rule in other jurisdictions that the staleness determination depends on the nature of criminal activity, the length of the activity, and the nature of the property to be seized; *Andresen v. Maryland*, 427 U.S. 463, 478 n.9, 96 S.Ct. 2737, 49 L.Ed.2d 627 (1976) (three-month delay in a warrant's execution ok due to the nature of the documentary evidence and the defendant's ongoing criminal activity); *State v. Perez*, 92 Wn.App. 1, 9, 963 P.2d 881 (1998) (staleness also depends upon the probability that items sought in connection with criminal activity will still be at the location at the time of the search); *State v. Hall*, 53 Wn.App. 296, 299-300, 766 P.2d 512 (1989) (two-month lapse between the informant's tip and

execution of the search warrant ok because it was reasonable to believe that the grow operation was still in existence based on the number of marijuana plants already found and the informant's description of the size of the marijuana plants in the home. *Hall*, 53 Wn.App. at 300.

However, the information provided must allow a strong inference that the type of criminal activity being alleged is the type that is likely to still be present. In the unpublished case, *State v. Hankins*, 35604-0-II, the informant failed to supply probable cause that evidence of a methamphetamine lab would still be present at a residence as the informant learned that the defendant only had access to the location for a two-month period, which had ended well before the warrant issued.

Case law is clear that probable cause will not be found from a months-old tip unless the activity described is of a type likely to still be ongoing at the time the warrant is sought. In *State v. Higby*, 26 Wn.App. 457, 460, 613 P.2d 1192 (1980), a two-week passage of time between a sale of marijuana and the warrant being sought was deemed too stale to support a finding of probable cause as there was no other information indicating that the activity was still occurring at that location.

In an unpublished opinion, the court in *State v. Smith*, 66143-4-I (2012) rejected the State's fallback argument that police properly seized a lockbox suspected of containing cash from drug sales because the

informant describing the lockbox had given the information to police six months earlier, too long under the circumstances — even though police had conducted two controlled buys with Smith within three months of issuance of the warrant. The court found “[t]he information was stale and could not provide probable cause for the search.” *Id.*, at 4.

See also *State v. Willey*, 363 A.2d 739 (Me 1976) (three purchases spanning an eight day period, the last made 31 days prior to issuance of the warrant was insufficient to establish probable cause);

Moreover, the affidavit must at the very least set forth a date or easily ascertainable timeframe in which illegal activity is claimed to have been observed; that is to say that “the magistrate cannot determine whether observations recited in the affidavit are stale unless the magistrate knows the date of those observations”. *State v. Lyons*, 174 Wn.2d 354, 275 P.3d 314, (2012).

Review of the issuance of a search warrant is for abuse of discretion. *State v. Maddox*, 152 Wash.2d 499, 509, 98 P.3d 1199 (2004). Although a reviewing court defers to the magistrate's determination, the trial court's assessment of probable cause is a legal conclusion which is reviewed de novo. *State v. Chamberlin*, 161 Wash.2d 30, 40-41, 162 P.3d 389 (2007).

When reviewing whether probable cause supported the issuance of a search warrant, the reviewing court is to consider only the information contained within the four corners of the supporting affidavit. *State v. Neth*, 165 Wn.2d 177, 182, 196 P.3d 658 (2008).

INFORMANT RELIABILITY:

When basing probable cause, at least in part, upon information provided by an informant, the informant himself must be deemed reliable under the *Aguilar-Spinelli* test. *State v. Chenoweth*, 160 Wn.2d 454, 158 P.3d 595, (2007).

The two prongs of the *Aguilar-Spinelli* test, reliability and basis of knowledge, are to be applied independently when evaluating the informant. *Id.*

Typically, an officer's affidavit stating that the informant has often furnished reliable information in the past establishes general trustworthiness and satisfies this prong. *Id.*

The other prong, basis of knowledge, can generally be satisfied when the officer explains how the informant claims to have come by the information. Even if the informant states how he obtained the information, however, it is still necessary to establish the informant's credibility. *State v. Chenoweth*, 160 Wn.2d 454, 158 P.3d 595, (2007).

The most common way to satisfy the "veracity" prong is to evaluate the informant's "track record", i.e., has he provided accurate information to the police a number of times in the past? If the informant's track record is inadequate, it may be possible to satisfy the veracity prong by showing that the accusation was a declaration against the informant's penal interest. *State v. Chenoweth*, 160 Wn.2d 454, 158 P.3d 595, (2007).

The remedy for evidence seized in violation of Article 1, Section 7 is suppression. *State v. Myers*, 117 Wn.2d 332 (Wash. 1991), 815 P.2d 761.

STALENESS OF CARTER INFORMATION: First of all, Carter made claims about Shasta Conner four months prior to the warrant being sought. This was not a grow operation where the very nature of the criminal activity is not a "here one minute, gone the next" type of activity. Alleged here is drug dealing which, for currency and probable cause determinations, requires that the activity be occurring at the time the warrant is sought, and that the contraband proposed to be seized is likely to be currently in the location identified. There was no way of determining or inferring that drugs would be in Ms. Conner's vehicle from what Carter had claimed. He never said that Ms. Conner kept drugs in her vehicle and there is no way to determine with any relative certainty that she would

have drugs in her vehicle four months later. Carter also never described her vehicle.

Moreover, Carter never says when he obtained drugs from his source of supply. He said she “was” his source of supply. He did not say that the drugs in his possession were obtained from Ms. Conner, and he does not say when he obtained them. The drugs in his possession could have been from another supplier, at any time in the past, and Carter may have just decided to inform on Shasta Conner and protect his true supplier. Carter’s information is stale due to age and the uncertainty of the timeframe of his alleged observations.

VAGUENESS OF CARTER INFORMATION: Carter merely gives the name of “Shasta Conner” and identifies her in a social media photo provided by police which is not saved as part of the investigation nor shown to the magistrate. There is no indication as to where he purchased from the source. He further attempted and failed to arrange any kind of deal or obtain any kind of admission from the person whom he called from the jail, and nothing he told the police was corroborated. The information was nothing upon which the police could act in September of 2016, and it became no more useful with age.

UNRELIABILITY OF CARTER INFORMATION: Under the Aguilar-Spinelli analysis, to be reliable, the informant must give a basis of how he

obtained the information, and he should have some kind of track record with providing reliable information to police.

Here, Carter gives no details at all regarding Shasta Conner other than to say that she “was” his supplier. He provides no basis whatsoever. Moreover, Carter, apparently, has provided no useful information to police in the past. Without either a basis for his information or something to support his credibility, his information simply fails to warrant consideration under Aguilar-Spinelli.

Add to that the fact that he is on probation and has been caught with a firearm and a large amount of methamphetamine, with his extensive criminal history, he is in significant trouble and would say anything to get out from under his current liability.

Considering as well his extensive criminal history of multiple felonies and misdemeanors, including possession of stolen property and burglary, his word has little value.

Carter’s information is not given against his penal interest and lacks any indicia of reliability and should be excised from the analysis.

UNRELIABILITY OF LAWHEAD INFORMATION: A felon on probation who is arrested on a fugitive warrant, Lawhead is quick to cooperate with police to get favorable treatment.

He does not know anything other than the name “Shasta” and does not identify a photo of her. He states that Shasta drives a “Maxima” and when police later see Shasta Conner, she drives up in an Altima. They are both Nissans. They are both real cars, but they are not the same and anyone who was as involved with Shasta Conner as he claimed to be, should know the difference.

Also, his statement that she was “sitting on five ounces right now” is completely without foundation and should not be considered.

Lawhead does not recall any single place where he has met her even though he claims that it had been two times within the prior seven days. He sent messages to a person he claimed was Shasta and failed to arrange a buy. An officer who is present during Lawhead’s phone calls with Shasta says later that the voice on the phone “appeared” to be the same as Shasta Conner’s when he met her in front of her house.

It is true that Lawhead provides more detailed information than does Carter, but it is also true that he has absolutely no track record of providing reliable information in the past to police, and none of what he claims is corroborated by police.

What should have fueled further doubt about Lawhead was his criminal history which included multiple arrests and convictions for felonies and misdemeanors, among which were Unauthorized Use of a Motor

Vehicle, Possession of a Stolen Vehicle, Attempted Tampering with a Witness and Vehicle Prowling II.

CONTACT WITH CONNER OFFERS NO CORROBORATION OR ADDITIONAL SUPPORT FOR THE WARRANT:

As an initial matter, Ms. Conner arrives at her home in a “Black Altima”, not a Maxima. Rather than contact Lawhead to discuss the discrepancy, police apparently consider the vehicle to be “close enough” and quickly pivot to calling it “the Nissan”. Ms. Conner denies knowledge of their allegations and denies consent to search. Without a warrant, and prior to deploying the drug-sniffing dog, police arrest Ms. Conner, handcuffing her and seizing her purse and phone.

Police appear to be suggesting in their affidavit that Ms. Conner indicated “affirmation” by nodding her head when being told of the informants and the officer’s intent to have the drug-sniffing dog “run around” her car. This is, however, ingenuous; Ms. Conner had just denied consent to search and it is extremely unlikely that she would verbally deny consent to police to conduct a search and, moments later, nod consent. And consent to the information regarding the informants and the impending drug-sniffing dog activities by the same gesture is a non sequitur — it makes not logical sense. Regardless, consent requires an affirmative, unequivocal relinquishment of a Constitutional right. The

seizure of her belongings was without a warrant and without consent. Moreover, their entire contact with Ms. Conner did no more than corroborate a single, innocuous fact — that she drove a black car.

Once we excise all of Carter's and Lawhead's unreliable and uncorroborated claims, we have only an innocuous contact with Ms. Conner coupled with the results of the drug-sniffing dog search.

A drug-sniffing dog search, however, in the absence of a legitimate stop, is illegal and does not constitute probable cause to justify issuance of a search warrant.

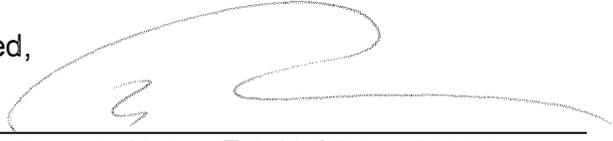
In this case, the drugs, cash and notes were seized in violation of Ms. Conner's Constitutional right to be free from unlawful, warrantless searches. The remedy is suppression of the evidence seized.

CONCLUSION

For all of the reasons above, the Defendant's conviction should be reversed and remanded for dismissal.

DATED this 28 day of May, 2020.

Respectfully Submitted,



BRIAN A. WALKER, WSBA # 27391
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CERTIFICATE OF SERVICE

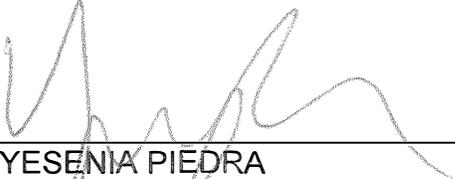
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