

NO. 34766-4-III

THE COURT OF APPEALS OF THE STATE OF WASHINGTON

DIVISION THREE

STATE OF WASHINGTON,

Respondent,

v.

TAMMY DAVIS,

Appellant.

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

APPELLANT'S OPENING BRIEF

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A. INTRODUCTION.

Tammy Davis asked the court to take her dire financial circumstances into account when imposing sentence following her conviction for possessing a small amount of methamphetamine. She was disabled, the primary care-giver for her grandson, and was likely to lose her housing due to her conviction. Yet the court imposed an array of discretionary financial obligations, an unauthorized term of community custody with conditions that required she pay further supervision expenses, and behavioral restrictions unrelated to the crime for which she was convicted. A new sentencing hearing is required.

B. ASSIGNMENTS OF ERROR.

1. The court impermissibly imposed numerous financial obligations at sentencing despite Ms. Davis' indigence.
2. The court erroneously ordered a term of community custody contrary to the terms of the governing statute.
3. The court imposed unlawful community custody conditions.
4. The court improperly entered a finding that Ms. Davis had a chemical dependency without substantial evidence in the record. CP 24.

C. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR.

1. Recent case law and court rules limit a court's discretion to impose costs on an indigent person as part of her sentence. Ms. Davis told the court she lived on a restricted income supported solely by federal disability payments and supported herself and her grandson. Did the court exceed its authority and unfairly impose numerous discretionary costs on Ms. Davis despite knowing of her indigence?

2. The first time offender statute prohibits a court from imposing community custody longer than six months unless necessary for the needs of treatment, and only permits treatment if there is evidence of chemical dependence. The court ordered Ms. Davis complete 12 months of community custody without connecting this term to the needs of treatment needs and without evidence Ms. Davis suffered from chemical dependence requiring long-term treatment. Did the court lack authority to impose this lengthy term of community custody?

3. Community custody conditions must be authorized by statute, and the governing statute requires most conditions to be related to the crime of conviction. The court ordered conditions that were not crime-related or other authorized, such as staying out of taverns, not

possessing alcohol, and submitting to drug and alcohol testing at her own expense. Should this Court strike the unauthorized conditions of community custody?

D. STATEMENT OF THE CASE.

Tammy Davis is 56 years old, suffers from severe arthritis that renders her too disabled to work, and has been the primary care-giver for her 14-year-old grandson since he was born. RP 115-16, 162-63.

On December 23, 2015, Ms. Davis bought pants at a second-hand store. RP 119-20. She went to her friend Pamela Stevens' house and changed because her own pants no longer fit. RP 111-12. After talking and eating Christmas treats with Ms. Stevens, Ms. Davis bought a few items at Wal-Mart. RP 113, 123.

After she left the store, a cashier noticed a small baggie on the ground potentially containing drugs. RP 86, 91. Surveillance video showed this baggie fell from Ms. Davis's pocket when she was paying for her items at the cash register. RP 88. In the video, Ms. Davis appears unaware of the baggie's existence. RP 90; Ex. 1.

The baggie contained 0.6 grams of methamphetamine and Ms. Davis was arrested for unlawful possession of a controlled substance. RP 101, 105.

At her trial, Ms. Davis explained her possession was unwitting. She did not know this substance was in the pocket of the pants she bought that day at a used clothing store. RP 124. The court instructed the jury Ms. Davis bore the burden of proving she did not knowingly possess this baggie and the jury convicted her. CP 17, 23.

At sentencing, the prosecution agreed the “first-time offender waiver is appropriate here,” thus waiving the requirements of the standard range. RP 160. Ms. Davis told the court she supported herself and her grandson solely on social security disability income and she feared she would lose her housing support due to her conviction. RP 162, 166.

The prosecution recommended a 30-day jail sentence but Ms. Davis asked for community release so she could care for her grandson. RP 160-61, 164-65. The court ordered she serve 30 days in confinement but allowed her to fulfill 27 of the 30 days on work crew. RP 165-66.

The work crew office refused Ms. Davis’ participation because she was physically unable to perform the work required. RP 172-73. At a second sentencing hearing, she asked for community service because it would be less physically intensive. RP 172. The court ruled she must

serve 15 days in jail and perform 12 days of community service as a substitute for work crew. RP 175.

The court also ordered Ms. Davis must complete 12 months of community custody and comply with several conditions. CP 27. Among these conditions, the court required her to obtain a drug and alcohol evaluation and comply with any treatment recommendation, not possess or consume alcohol, submit to random drug and alcohol tests and pay for the expenses of these tests. *Id.*

Ms. Davis' attorney informed the court several times that Ms. Davis' income was limited to social security disability. RP 162, 163. Defense counsel told the court, "And in terms of costs, I think the Court needs to take into consideration her status on SSI and the fact that her income is going to be limited certainly in the future." RP 164. Counsel also cautioned the court that Ms. Davis was likely to lose her Section 8 housing voucher due to her conviction, which would increase her housing expenses. RP 166.

The court ordered Ms. Davis to pay numerous LFOs, including \$450 in court costs, \$500 for a court appointed attorney, and \$100 for a crime lab fee that could be waived due to indigence. CP 28; RP 167.

The court also ordered her to pay all expenses of drug testing and supervision. CP 27; RP 167.

At the second sentencing hearing, when the court learned Ms. Davis' physical limitations made her ineligible to work crew, Ms. Davis also gave additional detail to the court about her increasingly dire financial circumstances. RP 172. She received \$960 per month from social security disability. RP 172. Ms. Davis explained, "[m]y housing assistance got terminated because of the conviction and now I'm supposed to pay [\$]750 [in rent], . . . I may have to move because it is too much when I only get [\$]960" per month. RP 175. From this limited income, she also had to pay utilities and any other expenses. RP 175.

The court asked Ms. Davis if she could pay \$25 per month in LFOs. RP 175. Ms. Davis said she would try, but \$15 per month would be better. RP 175-76. The court ordered her to pay \$15 per month in LFOs in addition to other costs of supervision and to perform the 12 days of community service by completing 16 hours per month after she served her jail sentence. RP 178.

E. ARGUMENT.

The court imposed unlawful sentencing terms and onerous legal financial obligations upon an indigent woman, despite uncontested evidence of entrenched poverty.

Ms. Davis informed the court she was disabled and indigent. She asked the court to take her poverty and pressing personal financial needs into account when imposing sentence. Despite this information and even though the court was purportedly imposing a first time offender waiver intended to be more lenient than the standard range, the court essentially imposed the equivalent of a standard range sentence, including 12 months of community custody, numerous expensive conditions of community custody, and multiple discretionary costs.

1. The court imposed onerous costs and fees despite plain evidence of Ms. Davis' inability to pay.

Under RCW 10.01.160(3), the sentencing judge must consider the defendant's individual financial circumstances and make an individualized inquiry into the defendant's current and future ability to pay. *State v. Blazina*, 182 Wn.2d 827, 837-38, 344 P.3d 680 (2015). As the *Blazina* Court held, "[b]y statute, 'the court *shall not* order a defendant to pay costs unless the defender is or will be able to pay

them.” *Id.* at 838, quoting RCW 10.01.160(3) (emphasis added in *Blazina*).

The “shall” in RCW 10.01.160(3) is “imperative.” *Id.* at 838. “[I]t creates a duty” and does not merely confer discretion. *Id.* “Practically speaking” this imperative obligation means the court must consider the defendant’s current and future ability to pay, including the individual’s other debts. *Id.*

To determine a person’s ability to pay costs, “the court *shall* take account the financial resources of the defendant and the nature of the burden that payment of costs will impose.” *Id.* (emphasis added in *Blazina*).

It is “legal error” for a court to disregard evidence about an individual’s ability to “currently meet her own basic needs when evaluating her ability to pay.” *City of Richland v. Wakefield*, 186 Wn.2d 596, 606, 380 P.3d 459 (2016). A person’s ability to pay her inescapable daily needs of basic survival, including food, shelter, and medical expenses, are central factors for the court when determining a person’s ability to pay discretionary fees. *Id.*

When a person supports herself on federal supplemental security income, she “shall be determined to be indigent.” GR 34; *Wakefield*,

186 Wn.2d at 607. Ms. Davis was receiving supplemental social security income due to a disability. She received \$960 per month and was unable to work and informed the court of her dire financial circumstances.

A person is also indigent when her income falls below 125 percent of the federal poverty guidelines. *Wakefield*, 186 Wn.2d at 607; GR 34. In 2016, the federal poverty guideline for one person was \$11,880 per year, or \$990 per month at 100 percent of the guidelines, and \$12,060 per year and \$1,005 per month at 125 percent of guideline.¹ Ms. Davis' income fell below this federal poverty mark *and* she supported not only herself, but also her grandson, which the court also knew when imposing Ms. Davis' sentence.²

Moreover, a court may not order a person to use federal social security disability income to pay court fees. *Wakefield*, 186 Wn.2d at 608-09. It violates federal law for a court to order a person pay LFOs if the person's only source of income is federal disability payments. *Id.*

¹ The 2016 federal poverty guidelines are available at: <https://www.federalregister.gov/documents/2016/01/25/2016-01450/annual-update-of-the-hhs-poverty-guidelines> (last viewed April 14, 2017).

² For a household with two people, 125 percent of the federal poverty guideline in 2016 was \$16,240 per year, or \$1353 per month. *Id.*

Ms. Davis' income consisted only of this federal social security supplemental income due to her disability.

Defense counsel told the court it “needs to take into consideration [Ms. Davis’] status on SSI and the fact that her income is going to be limited certainly in the future” before imposing costs as part of her sentence. RP 164. The prosecution also alerted the court, “there is recent case law on SSI and discretionary LFOs that may have an impact on that.” RP 174.

This “recent case law” the prosecution referred to was presumably *Wakefield*, decided several weeks before the second sentencing hearing. The court did not appear to understand this oblique reference, because it imposed discretionary LFOs and ordered Ms. Davis pay \$15 per month toward her LFOs, even though *Wakefield* expressly forbids this type of LFO order for an impoverished person who supports herself on social security disability payments and can only pay sums so small that she will never make a dent in the accumulating interest. RP 175; 186 Wn.2d at 607-08.

In *Wakefield*, the Court took the unusual step of issuing a decision for the purpose of guiding future sentencing courts even though the issue was moot because the State conceded error in the

course of the appeal. Ms. Wakefield informed the court she was impoverished, unable to work, and supported herself with social security disability income. The trial court ordered her to pay a mere \$15 per month for LFOs. But the Supreme Court pointedly reversed this imposition of costs.

The *Wakefield* Court “reiterate[d] the particularly punitive consequences of LFOs for indigent individuals.” *Id.* at 607. The accumulation of interest for LFOs means that a person paying a small amount, such as \$15 or \$25, will owe more ten years later than she owed at the outset. *Id.* Based on the consequences of imposing payment obligations on indigent people, the Supreme Court ruled “it is unjustly punitive to impose payments that will only increase LFO amounts over time.” *Id.* Under RCW 10.01.160(3), the “ability to pay” means the ability “to actually pay off” all LFOs. *Id.* If a person lacks this actual ability, it is not appropriate for a court to impose any discretionary costs. *Id.*

Here, the Court did precisely what *Wakefield* forbids. It ordered Ms. Davis pay \$15 per month toward LFOs, even though her income is solely derived from federal social security funds received for disability and it falls below 125 percent of the federal poverty guideline. Further,

Ms. Davis spends almost all of her monthly income on rent alone, not accounting for food, utilities or other basic needs of survival. The court's sentencing order required her to sacrifice her basic needs to pay her punishment. *Wakefield* holds that this sentencing order is legally erroneous and discretionary LFOs must be stricken.

2. The court imposed unfair and unauthorized sentencing terms and conditions.

The court deemed Ms. Davis a "first time offender," which entitled the court to sentence her below the otherwise mandatory standard range. CP 25; RCW 9.94A.650. Despite recognizing the appropriateness of ordering a more lenient sentence, the court imposed significant restrictions on Ms. Davis' liberty, substantial financial obligations, and appeared to misunderstand the required considerations of a first time offender sentence.

a. The court impermissibly ordered chemical dependency treatment.

The court checked a box on the judgment and sentencing finding Ms. Davis "has a chemical dependency that has contributed to the offense(s)," despite the lack of evidence that Ms. Davis had any drug or alcohol addiction. CP 24. This factual finding must be supported by some evidence or it is a manifest abuse of discretion. *See State v.*

Warnock, 174 Wn. App. 608, 614, 299 P.3d 1173(2013) (reversing chemical dependency finding without evidence drug abuse contributed to offense). There was no evidence Ms. Davis had a chemical dependency.

Although Ms. Davis was convicted of possessing one small baggie of methamphetamine on a single occasion, she testified her possession of this drug was unwitting. She “didn’t know there was anything in my pants,” and had purchased these pants the same day at a second-hand store. RP 120, 122, 124. Her daughter wrote the court after her mother’s conviction, explaining she sees her mother almost every day and never observed any behavior indicating Ms. Davis used any drugs. Supp. CP __, sub. no. 39. Ms. Davis’ friend saw Ms. Davis the day of the incident and she did not describe any behavior indicating she was under the influence of drugs. RP 112-14. There was no evidence Ms. Davis appeared under the influence, had any tools for ingesting drugs, or had possessed drugs at any time other than this single occasion. Because it is unreasonable to equate a single and isolated instance of possession with a chemical dependency, the court lacked a factual basis to enter this finding.

RCW 9.94A.607 requires a finding of “chemical dependency,” not mere single usage, to order treatment as a sentencing condition. Chemical dependence is a defined mental disorder with specific symptoms necessary for diagnosis. In *State v. Hutsell*, 120 Wn.2d 913, 917, 845 P.2d 1325 (1993), the court observed,

Dependence is a mental disorder, distinct from the direct physiological effects of psychoactive substance use, i.e., intoxication and withdrawal. American Psychiatric Ass'n, *Diagnostic and Statistical Manual of Mental Disorders* 165 (3d rev. ed. 1987) (DSM–III–R). Dependence has nine characteristic symptoms, three of which are necessary for diagnosis. DSM–III–R, at 166-67. Some of these symptoms include: unintended excessive substance use (*e.g.*, intending to take only one drink, but nevertheless drinking until severely intoxicated), unsuccessful efforts to reduce or control substance use, preoccupation with activities necessary to obtain and pay for the substance (*e.g.*, theft), and persistent use despite recognition of the resulting physical, psychological, and social problems. DSM–III–R, at 166–68.

Persistent and pathological drug use distinguishes chemical dependence from simple use. Abuse and dependency are not interchangeable terms. *See Warnock*, 174 Wn.App. at 613. The statute requires a finding of “chemical dependency” before ordering treatment as a sentencing condition, demonstrating the Legislature meant this type of persistent addiction to order treatment, and not a single instance of

possession. *See State v. Delgado*, 148 Wn.2d 723, 727-28, 63 P.3d 792 (2003); *Warnock*, 174 Wn.App. at 613.

The court's unsupported finding Ms. Davis had a chemical dependency must be stricken because it was not proven.

b. The court imposed an unauthorized term of community custody.

As a first time offender, community custody is optional. The governing statute provides, "the court may impose up to six months of community custody." RCW 9.94A.650(3). If "treatment is ordered," the court "may include up to the period of treatment, but shall not exceed one year." *Id.*

Here, the court imposed the maximum 12 months of community custody and did not connect this community custody to the necessary requirements of ordered treatment, contrary to RCW 9.94A.650(3). The court lacked authority to simply impose 12 months of community custody untethered to treatment needs.

Because there was no factual basis to order treatment, this community custody term is also improper. The court imposed 12 months of community custody without tying this length of supervision

to treatment needs and despite the lack of evidence justifying long-term chemical dependency treatment.

c. The improperly-ordered community custody included impermissible and unauthorized conditions.

The court's community custody order contained additional mandatory financial obligations. As part of community custody, DOC required Ms. Davis pay \$40 per month as a "cost of supervision fee." Supp. CP _, sub. no. 43 (second page of document, labelled page 10 of 16). The court also ordered Ms. Davis to pay "any expenses" for the court-ordered drug and alcohol evaluation and testing that would occur to monitor compliance with community custody. RP 167; CP 27 (imposing alcohol and drug testing "at the defendant's own expense").

These non-mandatory financial obligations arise in the context of an unauthorized term of 12 months of community custody for drug treatment where there was no factual evidence she needed such treatment. As this Court recently explained, the court must find a defendant is "able to pay the total amount of discretionary LFOs, including interest," when it finds a person is able to pay. *State v. Aguilar*, 2017 WL 1391134 at *3 (April 13, 2017) (unpublished, cited as non-binding authority under GR 14.1). Knowing that Ms. Davis had

extremely limited income, the court imposed discretionary obligations that required her to pay further costs that she would not be able to afford. The court did not take into account the added financial burden of these discretionary obligations. *See Wakefield*, 186 Wn.2d at 607-08.

One court-ordered condition of community custody stated Ms. Davis “shall not frequent places whose principal source of income is the sale of alcoholic beverages, i.e. taverns and cocktail lounges” without prior approval from the community custody officer. CP 27. She was also ordered not to “consume or possess alcohol” and to “submit to random urinalysis, BAC, or other tests at the direction of his/her community custody officers and at the defendant’s own expense.” *Id.*

There was no evidence or allegation that alcohol contributed to Ms. Davis’ conviction in any way.

RCW 9.94A.703(3)(e) permits the sentencing court to order an offender not to consume alcohol, even when there is no evidence alcohol contributed to the offense. *State v. Jones*, 118 Wn. App. 199, 206-07, 76 P.3d 258 (2003). The same is not true, however, for an order forbidding the defendant from entering an establishment where alcohol is the primary commodity offered for sale. This condition is only permitted if “crime-related.” RCW 9.94A.703(3)(f). A condition is

“crime-related” if it “directly relates to the circumstances of the crime for which the offender has been convicted.” RCW 9.94A.030(10).

In *Jones*, this Court found a requirement that a defendant participate in alcohol counseling was not crime-related. Jones pled guilty to first degree burglary and other crimes; there was no evidence that alcohol contributed to his crimes, and the court made no finding that it did. *Jones*, 118 Wn. App. at 202-03. While upholding the court’s requirement that Jones abstain from the use of alcohol, this Court found the sentencing court lacked statutory authority to require him to participate in alcohol counseling because the record did not show alcohol contributed to his offenses. *Id.* at 206-08.

Without evidence that alcohol consumption was related to the crime of conviction, the court must vacate the conditions that Ms. Davis shall not enter places where alcohol is the primary item for sale, submit to urinalysis and breathalyzer testing, and refrain from possessing and purchasing alcohol. There is no evidence Ms. Davis has an alcohol or substance abuse problem or that alcohol contributed to the single instance of drug possession. These community custody conditions are thus not authorized under the standard range or the first time offender

provisions and should be stricken. *Jones*, 118 Wn. App. at 212; RCW 9.94A.650(4); RCW 9.94A.703.

3. *The court must vacate the improperly ordered financial obligations and conditions of behavior.*

A person convicted of a crime “always has standing to challenge his or her sentence on grounds of illegality,” including unlawful community custody conditions. *State v. Valencia*, 169 Wn.2d 782, 787, 239 P.3d 1059 (2010); *see State v. Bahl*, 164 Wn.2d 739, 744, 193 P.3d 678 (2008). To the extent issues related to the onerous conditions placed on Ms. Davis were not fully litigated in the trial court, RAP 1.2(a) and (c) and RAP 2.5(a) encourage this Court to exercise discretion in addressing issues where justice demands, particularly regarding the unlawful imposition of sentencing conditions that will cause harm to an already impoverished woman and the grandchild she cares for. *See Blazina*, 182 Wn.2d at 835.

The court knew Ms. Davis’s dire financial circumstances yet it imposed numerous discretionary financial penalties. Any non-mandatory costs and fees the court ordered should be stricken based on her indigence. In addition, the court’s excessive imposition of one year of community custody should be stricken as contrary to RCW

9.94A.650(3). The court's conditions requiring drug and alcohol treatment and monitoring by expensive tests and behavioral restrictions are not crime-related, and without this statutory authorization they should be stricken.

Finally, in the event Ms. Davis does not substantially prevail on appeal, no costs should be imposed. RAP 14.2.

F. CONCLUSION.

The unlawful and unjust terms of Ms. Davis' sentence should be vacated on remand.

DATED this 25th day of April 2017.

Respectfully submitted,



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TAMMY DAVIS,)	
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Appellant.)	

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