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COURT OF APPEALS
DIVISION III
OF THE STATE OF WASHINGTON

STATE OF WASHINGTON, RESPONDENT

v.

WILLIE ASHER, APPELLANT

APPEAL FROM THE SUPERIOR COURT
OF SPOKANE COUNTY

BRIEF OF RESPONDENT

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I. APPELLANT’S ASSIGNMENTS OF ERROR

1. Insufficient evidence supports the conviction for second degree assault because the State failed to disprove self-defense beyond a reasonable doubt.

2. The court erred when it declined to consider an exceptional sentence below the standard range.

II. ISSUES PRESENTED

1. Did the State present sufficient evidence to disprove beyond a reasonable doubt that the defendant acted in self-defense?

2. Did the trial court properly decline to grant an exceptional downward sentence after considering the mitigating factors presented?

III. STATEMENT OF THE CASE

In 1993, Tommy Stephens purchased 30 acres of property north of Spokane, near Nine Mile Falls. Report of Proceedings (RP)¹ 70, 75. He subdivided the property into three 10-acre parcels, and gave the northern parcel to his daughter, Ms. MacArthur, when she got married. RP 81, 253. Ms. MacArthur and her husband lived on that land for about two years

¹ Unless otherwise stated, “RP” refers to the five-volume, consecutively numbered transcript of proceedings from September 8, 9, 13, 14, 15, 20, and 23 of 2016, and October 17, 2016.

before selling it to a military couple, who in turn, lived there for two or three years before relocating to Utah. RP 82, 256.

In 2009, Willie and Connie Asher bought the northern parcel, located north of Mr. Stephens' property. RP 430-31. The relationship between Mr. Stephens and Mr. Asher was initially a neighborly one, but soon deteriorated. RP 82-83. Mr. Stephens traces the start of the tension in their relationship to a dispute over one of Mr. Asher's horses, sometime before 2011. RP 86-88.

According to Mr. Stephens, Mr. Asher had a horse that he beat all the time. RP 86-87. Mr. Asher ultimately shot the horse and buried it next to Mr. Stephens' fence. RP 87. Mr. Stephens asked Mr. Asher to bury the horse elsewhere because electrical lines in that area prevented digging a grave deeper than three feet, but Mr. Asher responded aggressively that he was making payments on the land and could bury the animal wherever he wanted. RP 87-88. Mr. Asher would also yell that instead of worrying about Mr. Asher's horse, Mr. Stephens should worry about Mr. Asher shooting him or his horses. RP 89. That summer, dogs or coyotes continually dug up the horse's carcass, and the smell of decay persisted. RP 88. Mr. Stephens stated he has not set foot on Mr. Asher's land since the day Mr. Asher shot the horse. RP 94.

For his part, Mr. Asher attributes the breakdown in the relationship to Mr. Stephens' tendency to tell Mr. Asher how to tend to his land. RP 517. Regardless, both men agreed that their interactions quickly became caustic on both sides. RP 89-93, 517-18. Mr. Stephens said he tried to avoid Mr. Asher, but Mr. Asher would scream and curse at him – calling him, among other things, a “son of a bitch,” a “mother fucker,” and a “pig fucker” – when he walked past on his daily walk or when he was tending to his livestock. RP 89-92, 95.

Mr. Stephens admitted that at first, in an attempt to get Mr. Asher to leave him alone, he would invite Mr. Asher out to the road so he could “kick his ass,” at which point Mr. Asher would retreat to his house. RP 92-93. Mr. Stephens said he responded that way between 10 and 15 times until it stopped having any effect on Mr. Asher, which was about two or three years prior to the events that gave rise to this case. RP 93, 272. After that, Mr. Stephens would respond to Mr. Asher's cursing and threats by either ignoring him and walking away or telling him that they could go out to the road and Mr. Asher could speak to him like that out there. RP 92-94. Mr. Stephens denied ever making any physical gestures toward Mr. Asher, or even getting close enough to him to put his hands on him. RP 94.

Mr. Asher told a different story. He stated that after he put down his horse, Mr. Stephens came over to where Mr. Asher was burying it and

yelled he was going to stomp his “fucking brains out.” RP 522. Mr. Asher also said that every time he mowed his lawn, Mr. Stephens would threaten to kill him and would challenge him to fight and say things like “come over here, you yellow bellied mother fucker cock sucker.” RP 523, 526. He also accused Mr. Stephens of purposely plowing his fields during a social picnic Mr. Asher was having so that dust would blow over onto his property and ruin the event. RP 100.

Other individuals confirmed the conflict between the two men. According to William Manuel, a neighbor of both Mr. Stephens and Mr. Asher, on November 16, 2011, he was driving to volunteer at Spokane Falls Community College when he saw Mr. Stephens and Mr. Asher standing 10 or 15 feet apart on the road. RP 57-59. He said Mr. Asher had a gun in his hand and was pointing it at the ground, but that Mr. Stephens did not have a gun. RP 59. Mr. Manuel said he called the police, and after they had left, Mr. Asher told him he “wasn’t too happy with [Mr. Manuel] either.” RP 63.

John Koch, who considers Mr. Asher one of his best friends, said that he would often ride horses with Mr. Asher, and on those occasions, Mr. Stephens would yell profanities at him, threaten to kill Mr. Koch’s dog, and threaten to stomp Mr. Asher’s head in. RP 411-14. Mr. Koch said these occurrences happened consistently until June 2015. RP 419.

Things eventually escalated to the point that, on September 7, 2015, Mr. Asher fired a gun toward Mr. Stephens, which resulted in the State charging Mr. Asher with assault in the second degree with a firearm.² CP 12. After the first trial resulted in a hung jury, the case was tried again over a period of five days in September 2016. RP 5.

During his testimony, Mr. Stephens described the events that led to Mr. Asher firing a gun at him. Mr. Stephens said he had noticed about a year before that Mr. Asher had installed a wire fence for his dog against Mr. Stephens' pen panels, six inches onto Mr. Stephens' property. RP 97-98. Mr. Stephens let it go until the morning of September 7, 2015, when he noticed his calves were getting caught in the wire and the wire was cutting and skinning their legs. RP 98.

Later that day, while Mr. Stephens was out doing chores, he saw Mr. Asher and told him the fence would need to be moved because it was hurting his calves and was on his property. RP 98. Mr. Asher responded that it sounded like Mr. Stephens had a "fucking problem," and the two got into an argument. RP 98. At that point, the two men were each on their own property, separated by three fences and roughly 15 feet. RP 104-05. Mr. Asher then picked up a T-post and swung it at Mr. Stephens. RP 108.

² The State also charged Mr. Asher with harassment, but the jury found Mr. Asher not guilty on that count. CP 95.

When it missed Mr. Stephens, Mr. Asher threw it down and walked back toward his house. RP 108.

At that point, Mr. Stephens turned and began walking back to his house. RP 108. When he had made it about 75 feet from the fence, he heard Mr. Asher hollering at him to come back. RP 108. Mr. Stephens walked back, stepped on the second rung of his fence, pointed out where the property line was, and told Mr. Asher where his fence was supposed to be. RP 108. Mr. Asher then pulled a gun out of his back pocket and fired it into the ground near Mr. Stephens' feet. RP 109. He then raised the gun toward Mr. Stephens' chest. RP 109. Mr. Stephens stepped off the fence and walked back to his house to call 911. RP 109. He explained that due to issues with his feet, he could not have run on the uneven ground even if he had wanted to. RP 109.

Mr. Stephens called 911 at 6:06 p.m. RP 151. Mr. Asher also called 911 twenty-six minutes later, at 6:30 p.m. RP 153. Three deputies from the Spokane County Sheriff's Office responded. RP 122. They first contacted Mr. Stephens. RP 122. They testified Mr. Stephens seemed to be in shock, and was upset but remained calm. RP 123, 154, 205. After spending about 10 to 15 minutes with Mr. Stephens, the deputies went to speak with Mr. Asher. RP 155. As they approached, they saw Mr. Asher pacing

aggressively back and forth near the gate in front of his house. RP 126, 156-57, 207-08.

Because they knew a gun had been fired, the deputies commanded Mr. Asher to show his hands. RP 126, 158, 209. Mr. Asher angrily complied at first, but then became very irritated when the deputies tried to get him to turn around and kept screaming “what the fuck.” RP 158-60. Deputies Brandon Wilson and Stanislav Kravtsov were eventually able to grab Mr. Asher’s arms and put them behind his back. RP 161. Deputy Wilson remembered Mr. Asher looking at him with a “thousand yard stare,” which he described as “God awful anger being thrown at” him. RP 162-63, 186. Deputy Wilson said he tried to calm Mr. Asher down, but Mr. Asher appeared to have “locked in” on him with anger, so Deputy Kravtsov took over. RP 163-64.

With Deputy Wilson gone, Deputy Kravtsov was able to calm Mr. Asher down and asked him what had happened. RP 216. Mr. Asher told him that they had argued about the placement of the fence, and that Mr. Stephens had threatened to bash in Mr. Asher’s head. RP 217. Mr. Asher said Mr. Stephens began trying to climb the fence, at which point, Mr. Asher returned to his residence to get his gun. RP 218. Mr. Asher said that he then went back outside and found Mr. Stephens still attempting to climb the fence. RP 219. Mr. Asher told the deputy he asked

Mr. Stephens, “What the fuck’s wrong with you? Do you want to die?” RP 221. Mr. Asher said he then pulled his gun out and fired it towards where Mr. Stephens was standing. RP 221. He told the deputy that the bullet landed about five feet from where Mr. Stephens was standing. RP 221.

Deputy Kravtsov testified that at no point did Mr. Asher indicate that Mr. Stephens had made it over the fence or onto his property. RP 127, 217, 219. Deputy Kravtsov also testified that he asked Mr. Asher if he was afraid for his safety because of what Mr. Stephens was doing, and Mr. Asher responded, “No.” RP 22. Indeed, Deputy Kravtsov testified that when asked why he fired the shot, Mr. Asher responded that he wanted to scare Mr. Stephens and prevent him from messing with the fence. RP 222. When asked why Mr. Asher did not just return to his house and call 911, he said “I don’t just walk away like that.” RP 222-23.

In the meantime, Deputy Wilson spoke with Ms. Asher. RP 166. Deputy Wilson testified that at no point did Ms. Asher say she had observed what had happened between her husband and Mr. Stephens, and at no point did she express fear of Mr. Stephens or fear for her husband’s safety. RP 166. Ms. Asher gave Deputy Wilson the gun that Mr. Asher had used, which they had locked back up in a gun cabinet in their master bedroom. RP 168.

Mr. and Ms. Asher both testified at the trial. Mr. Asher said that on September 5, he went out to feed his horse and heard Mr. Stephens calling him. RP 541-42. He approached and heard Mr. Stephens saying he was going to kill Mr. Asher and then tear out his fence. RP 543. Mr. Asher said he expressed his confusion about what Mr. Stephens was talking about and Mr. Stephens said “I’m going to come over there you God damn ass, you son of a bitch, and ... I’m going to tear your fence out.” RP 543.

Mr. Asher testified that he told Mr. Stephens to go back into the house and call 911, but Mr. Stephens refused. RP 543. Mr. Asher said Mr. Stephens then started climbing the fence and was about to jump off the fence onto Mr. Asher’s property when Mr. Asher took his gun out – which he had been carrying the whole time – and warned him to stop. RP 544. Mr. Asher stated Mr. Stephens responded by saying “fuck you and that gun. I’m going to come over there and shove that son of a bitch up your fucking ass. I’m going to kill you, you son of a bitch.” RP 545. Mr. Asher said he then fired the gun. RP 546. Mr. Asher testified to being “scared to death” and said that he and Ms. Asher went back into their house. RP 547.

Ms. Asher testified that Mr. Asher had gone out to feed the horses and he was taking longer than usual so she went out to look for him. RP 466. She said that as she approached a window in the garage, she heard her husband say, “Get back. Go back to your own house.” RP 466. Ms. Asher

said she looked through the window and heard Mr. Stephens say he was going to come over and stomp Mr. Asher's head in and kill him. RP 467. Ms. Asher testified that as she made her way out of the garage, she heard a shot fired, and when she was again able to see them, Mr. Stephens was standing on their property with his back up against their fence. RP 468-69. She said Mr. Stephens then climbed back over the fence onto his property and went home, while she and Mr. Asher had a discussion on what had taken place, went back into the house and talked more about what had happened, and then called 911. RP 469-70. She also said that at no point had Mr. Asher come back inside to retrieve the weapon, but stated that he had taken it outside with him when he went to feed the horses. RP 497-98.

At the close of evidence, the jury was instructed that self-defense was a defense to the charge of second degree assault and that the State had to disprove the defense beyond a reasonable doubt for them to find Mr. Asher guilty. CP 86-88. The jury returned a guilty verdict, and answered in a special verdict form that Mr. Asher had committed the crime of second degree assault while armed with a firearm. CP 93-94.

The court sentenced Mr. Asher to a total of 39 months – the bottom end of the three- to nine-month standard range, plus a 36-month firearm enhancement. CP 177-78. In doing so, the court rejected Mr. Asher's request for an exceptional downward sentence of 36 months, which was

based on his argument that Mr. Stephens was a willing participant in the conflict. RP 881-88. Mr. Asher appealed. CP 194.

IV. ARGUMENT

A. THE STATE DISPROVED BEYOND A REASONABLE DOUBT THAT MR. ASHER ACTED IN SELF-DEFENSE WHEN HE SHOT AT MR. STEPHENS BY PRESENTING EVIDENCE FROM MULTIPLE WITNESSES THAT CONFIRMED MR. ASHER'S TESTIMONY AT TRIAL WAS INCONSISTENT WITH HIS PRIOR STATEMENTS.

The State presented sufficient evidence to disprove beyond a reasonable doubt Mr. Asher's claim that he acted in self-defense. Evidence is sufficient to support a conviction if, after viewing the evidence in the light most favorable to the State, it allows any rational trier of fact to find all of the elements of the crime charged beyond a reasonable doubt. *State v. Salinas*, 119 Wn.2d 192, 201, 829 P.2d 1068 (1992). Once a defendant has raised some credible evidence of self-defense, the burden shifts to the State to disprove self-defense beyond a reasonable doubt. *State v. Acosta*, 101 Wn.2d 612, 621, 683 P.2d 1069 (1984).

“To prove self-defense, there must be evidence that (1) the defendant subjectively feared that he was in imminent danger of death or great bodily harm; (2) this belief was objectively reasonable ... (3) the defendant exercised no greater force than was reasonably necessary...; and (4) the defendant was not the aggressor.” *State v. Callahan*,

87 Wn. App. 925, 929, 943 P.2d 676 (1997). Thus, to disprove the defense, the State must disprove at least one of these elements beyond a reasonable doubt. On issues of conflicting testimony, credibility of witnesses, and persuasiveness of the evidence, the reviewing court must defer to the trier of fact. *State v. Thomas*, 150 Wn.2d 821, 874-75, 83 P.3d 970 (2004).

At trial, the State presented sufficient evidence to disprove that Mr. Asher subjectively feared he was in imminent danger of bodily harm or death. The jury heard testimony from Mr. Stephens that he had not threatened to “kick Mr. Asher’s ass” in several years; that on September 7, 2015, Mr. Stephens made no attempt to climb over his fence; and that he never told Mr. Asher he was going to bash his head in.

The jury also heard testimony from several deputies. Each of the deputies confirmed that while Mr. Stephens was upset after being shot at, he was calm, and it was Mr. Asher who appeared angry and aggressive. Deputy Kravtsov testified that at no time during his contact with Mr. Asher did Mr. Asher claim that Mr. Stephens had actually climbed over his fence or that he shot the gun out of fear. Indeed, Deputy Kravtsov testified that Mr. Asher specifically told him he was *not* afraid for his safety, and that he fired the gun in order to scare Mr. Stephens into leaving the fence alone. Likewise, Deputy Wilson testified that Ms. Asher never told him she had observed what happened between her husband and Mr. Stephens, nor did

she express fear for her husband's safety. Though this testimony conflicts with Mr. and Ms. Asher's trial testimony, credibility issues are for the trier of fact.

The objective evidence presented at trial also undercuts Mr. Asher's testimony that he was afraid. Mr. Asher waited almost half an hour after shooting before calling the police, and then locked his gun back in the gun cabinet. These are not the actions of an individual who is afraid for his safety.

The State also presented evidence to disprove beyond a reasonable doubt that any subjective fear was objectively reasonable. The State's evidence was that Mr. Stephens stepped onto the second rung of his fence and pointed out the property line. Fear for one's life or safety in response to such actions is not reasonable.

Likewise, the State presented sufficient evidence to disprove beyond a reasonable doubt that Mr. Asher used no greater force than was reasonably necessary. Again, the evidence was that Mr. Stephens was pointing out the property line and requesting Mr. Asher to move the fence. There was no evidence that he had a weapon of any kind. Firing a gun at someone under such circumstances represents greater than necessary force.

Finally, the State presented sufficient evidence to disprove beyond a reasonable doubt that Mr. Asher was not the aggressor. The State

presented evidence that Mr. Stephens had walked away from the fence toward his home after talking with Mr. Asher about the fence, but that Mr. Asher called him back and then fired a gun at him. Mr. Asher was the aggressor.

The jury was entitled to believe Mr. Stephens and the deputies, and to disbelieve Mr. and Ms. Asher. Viewing the evidence in the light most favorable to the State, a rational trier of fact could find the State disproved each of the elements of self-defense beyond a reasonable doubt. As such, the conviction must be affirmed.

B. THE COURT PROPERLY CONSIDERED AND DENIED MR. ASHER'S REQUEST FOR AN EXCEPTIONAL DOWNWARD SENTENCE BECAUSE IT DID NOT BELIEVE MR. ASHER'S VERSION OF EVENTS.

Mr. Asher's request for an exceptional downward sentence was properly considered and denied. Generally, a sentence within the standard range may not be appealed. RCW 9.94A.585(1); *State v. Garcia-Martinez*, 88 Wn. App. 322, 328, 944 P.2d 1104 (1997). However, "[w]hile no defendant is entitled to an exceptional sentence below the standard range, every defendant *is* entitled to ask the trial court to consider such a sentence and to have the alternative actually considered." *State v. Grayson*, 154 Wn.2d 333, 342, 111 P.3d 1183 (2005) (emphasis in original). "A trial court abuses its discretion when 'it refuses categorically to impose an

exceptional sentence below the standard range under any circumstances.’”
Id. (quoting *Garcia-Martinez*, 88 Wn. App. at 330). However, when a trial court considers the facts and concludes that there is no basis for an exceptional sentence, it has exercised its discretion, and the defendant may not appeal that ruling. *Garcia-Martinez*, 88 Wn. App. at 330.

Mr. Asher requested an exceptional downward sentence. The request was based on RCW 9.94A.535(1)(a) – which states that the fact that the victim was to a significant degree “an initiator, willing participant, aggressor, or provoker of the incident” is a mitigating factor the trial court can consider in deciding whether an exceptional sentence is warranted – and *State v. Whitfield*, 99 Wn. App. 331, 994 P.2d 222 (1999), which held that failed defenses may be considered in support of an exceptional sentence “where the circumstances that led to the crime ... justify distinguishing the conduct from that involved where those circumstances were not present.’” *Whitfield*, 99 Wn. App. at 336 (quoting *State v. Hutsell*, 120 Wn.2d 913, 921, 845 P.2d 1325 (1993)). RCW 9.94A.535(1) grants the trial court discretion to impose an exceptional sentence below the standard range only where such a mitigating factor has been established by a preponderance of the evidence. RCW 9.94A.535(1).

Contrary to Mr. Asher’s argument, the trial court considered the request for the exceptional downward sentence. After hearing defense

counsel's argument about how Mr. Stephens continually engaged in conflict with Mr. Asher, and after Mr. Asher himself relayed to the court his feeling that he had only shot to protect himself after doing everything he could to resolve the situation by begging, pleading, and insisting that Mr. Stephens call law enforcement, the court stated that it had heard the testimony at trial and observed the parties' demeanors and did not believe that Mr. Asher did anything to deescalate the situation. RP 895.

The court specifically noted an incident testified to at trial in which it took an hour for an officer to calm Mr. Asher down after dust from Mr. Stephens' plowing blew over and ruined Mr. Asher's picnic. RP 894. It also stated that Mr. Asher's tendency to make situations worse was obvious from his behavior in court when the verdict was read. RP 895. Apparently, some individuals were laughing in the courtroom and Mr. Asher turned around and said something inappropriate to Mr. Stephens right in front of the court. RP 895.

Ultimately the court found that the situation on September 5 was something that Mr. Asher could have handled, but he only made it worse, and instead of calling 911, went back to his house, retrieved his gun, and shot it at Mr. Stephens. RP 894-96. The court stated that it did not find that Mr. Asher was acting out of fear for his safety. RP 894-95. Accordingly, the court considered the mitigating factor, but did not believe that Mr. Stephens

was, to a significant degree, a provoker of the incident, or that Mr. Asher was acting out of fear for his safety when he shot the gun. The court therefore appropriately declined the request for an exceptional downward sentence.

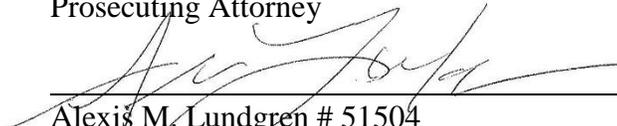
Because the trial court considered the mitigating factors, it did not abuse its discretion, and its decision to deny the exceptional sentence is not appealable. This court should decline review of this issue and affirm Mr. Asher's sentence.

V. CONCLUSION

Because the State presented sufficient evidence to disprove beyond a reasonable doubt that Mr. Asher acted out of self-defense when he shot his gun, the State respectfully requests this Court to affirm Mr. Asher's conviction for second degree assault with a firearm. And because the trial court appropriately considered the mitigating factors presented at sentencing, the State respectfully requests that this Court find that issue unappealable and decline review.

Dated this 20 day of December, 2017.

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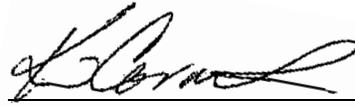
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I certify under penalty of perjury under the laws of the State of Washington, that on December 20, 2017, I e-mailed a copy of the Brief of Respondent in this matter, pursuant to the parties' agreement, to:

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