

NO. 35295-1-III
COURT OF APPEALS
STATE OF WASHINGTON
DIVISION III

STATE OF WASHINGTON,

Plaintiff/Respondent,

V.

BRYAN JACOB STORMS,

Defendant/Appellant.

BRIEF OF APPELLANT

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ASSIGNMENTS OF ERROR

1. Bryan Jacob Storms, at his resentencing hearing, was denied effective assistance of counsel as guaranteed by the Sixth Amendment to the United States Constitution and Const. art. I, § 22.

2. The imposition of a four hundred and thirty-two (432) month sentence at Mr. Storms' resentencing hearing, resulting from the trial court running Count IV consecutive to Counts I, II and III, when the Court had previously run Count IV concurrent with the other three (3) counts, implicates a presumption of trial court vindictiveness.

ISSUES RELATING TO ASSIGNMENTS OF ERROR

1. Did defense counsel's failure to advise the trial court that it had discretion to impose concurrent sentences in accord with *Personal Restraint of Mulholland*, 161 Wn.2d 322, 166 P.3d 677 (2007) and/or to oppose running Count IV consecutive to the other counts constitute ineffective assistance of counsel?

2. Did the trial court act vindictively when it had previously run Count IV concurrent with Counts I through III; but, at the resentencing hearing, ran it consecutive?

STATEMENT OF THE CASE

Mr. Storms was originally convicted of vehicular homicide (DUI prong), vehicular assault (2 counts) and felony hit and run (death resulting). Judgment and Sentence was entered on July 22, 2014. (CP 7)

Mr. Storms filed a Notice of Appeal and the Court of Appeals subsequently ruled that his blood test results should have been suppressed. The case was remanded to the trial court for resentencing. (CP 29)

Resentencing occurred on May 3, 2017. The trial court's sentence changed. The court ran Count IV consecutive to Counts I, II, and III. In the original Judgment and Sentence Count IV was to run concurrent with the other counts. (RP 6.14 50 RP 10, 6.8; RP 14, 6.9 to RP 15, 6.24)

An Amended Judgment and Sentence was entered on May 4, 2017. A Second Amended Judgment and Sentence was filed May 11, 2017 (CP 42; CP 62).

Mr. Storms filed his Notice of Appeal on May 15, 2017. (CP 79)

SUMMARY OF ARGUMENT

Defense counsel's failure to argue for concurrent sentences, under the authority of *Personal Restraint of Mulholland, supra*, constituted ineffective assistance of counsel and denied the trial court the opportunity to exercise discretion at the resentencing hearing.

Defense counsel was also ineffective in not opposing the trial court's act of running Count IV consecutive to the other counts.

The trial court acted vindictively when it ran Count IV consecutive to the other counts. The imposition of a four hundred and thirty-two (432) month sentence on Mr. Storms, in the absence of any change in circumstances from the original sentencing hearing where Count IV was run concurrent with the other counts, meets the criteria necessary for a presumption of vindictiveness (CP 24).

Mr. Storms is entitled to be resentenced in accord with recognized precepts of fairness and justice. Any resentencing hearing should be before a different judge.

The Court of Appeals should direct that the resentencing hearing preclude running Count IV consecutive to the other counts in the absence of a change in circumstances between the original sentencing and the resentencing date.

ARGUMENT

I. INEFFECTIVE ASSISTANCE OF COUNSEL

To establish ineffective assistance of counsel, the defendant must establish that his attorney's performance was deficient and the deficiency prejudiced the defendant. *Strickland v. Washington*, 466 U.S. 668, 687, 104 S. Ct. 2052, 20 L. Ed.2d 674 (1984); *State v. Hendrickson*, 129 Wn.2d 61, 77-78, 917 P.2d 563 (1996). Deficient performance is performance falling "below an objective standard of reasonableness based on consideration of all the circumstances." *State v. McFarland*, 127 Wn.2d 322, 334-35, 899 P.2d 1251 (1995). Reasonable conduct for an attorney includes carrying out the duty to research the relevant law. *Strickland*, 466 U.S. at 690-91. The prejudice prong requires the defendant to prove that there is a reasonable probability that, but for counsel's deficient performance, the outcome of the proceedings would have

been different. *State v. Leavitt*, 111 Wn.2d 66, 72, 758 P.2d 982 (1988). If either element of the test is not satisfied, the inquiry ends. *Hendrickson*, 129 Wn.2d at 78.

State v. Kylo, 166 Wn.2d 856, 862, 215 P.3d 177 (2009).

Defense counsel's argument at the resentencing hearing consisted of the following:

I think we can kind of cut to the chase here. Everything was affirmed in this case by the Court of Appeals except that the under the influence prong was stricken. You don't get to ask for the same sentence. They didn't say you can ask for additional time on your aggravators.

There are reasons why the prongs on the vehicular homicide statute are progressively harsher regarding penalties. You have disregard for safety, reckless driving, vehicular homicide under the influence.

...

If you look at the low [*Sic.*] end of the reckless driving prong, it's 144 months. The

84 months on each of the vehicular assault charges, you get 312 months. If you use the low end of the sentencing range, 63 months for each of the vehicular assault and 108 for the vehicular homicide reckless driving.

I think that's what the Court said. That's period. The Court said the aggravators are affirmed. The other issues are affirmed. The exceptional sentence was affirmed.

It didn't say you get re-sentenced and you get to reargue the aggravators. If you do that, it's probably just going to come back again.

(RP 6, l. 19 to RP 8, l. 1)

Defense counsel never advised the trial court that it had the option/discretion to consider concurrent sentences.

A trial court cannot make an informed decision if it does not know the parameters of its decision-making authority. Nor can it exercise its discretion if it is not told it has discretion to exercise.

State v. McGill, 112 Wn. App. 95, 102, 47 P.3d 173 (2002).

Mr. Storms contends that defense counsel should have been fully aware of the case of *Personal Restraint of Mulholland, supra*. The *Mulholland* case was decided in August of 2007. The *Mulholland* Court considered the interrelationship between RCW 9.94A.535 and RCW 9.94A.589(1).

The *Mulholland* Court affirmed the Court of Appeals and ruled at 331:

In sum, the plain language of RCW 9.94A.589(1) and RCW 9.94A.535 support the Court of Appeals' determination that the trial court had the discretion to impose an exceptional sentence.

The facts in the *Mulholland* case pertained to whether or not concurrent sentences could be imposed under the respective statutes for serious violent offenses. Mr. Storms' convictions for vehicular homicide and vehicular assault are only violent offenses.

RCW 9.94A.589(1)(b) states, in part:

Whenever a person is convicted of two or more **serious violent offenses arising from separate and distinct criminal conduct**, the standard sentence range for the offense with the highest seriousness level under RCW 9.94A.515 shall be determined using the offender's prior convictions and other current convictions that are not serious violent offenses in the offender score and the standard sentence range for other serious violent of-

fenses shall be determined by using an offender score of zero. The standard sentence range for any offenses that are not serious violent offenses shall be determined according to (a) of this subsection. All sentences imposed under (b) of this subsection shall be served consecutively to each other and concurrently with sentences imposed under (a) of this subsection.

(Emphasis supplied.)

It is readily apparent that the trial court's sentencing of Mr. Storms violated the provisions of RCW 9.94A.589. RCW 9.94A.589(1)(a) provides, in part:

As provided in (b) or (c) of this subsection, whenever a person is to be sentenced for two or more concurrent offenses, the sentence range for each current offense shall be determined by using all other current and prior convictions as if they were prior convictions for the purpose of the offender score ... **Sentences imposed under this subsection shall be served concurrently. Consecutive sentences may only be imposed under the exceptional sentence provisions of RCW 9.94A.535. ... This definition applies in cases involving vehicular assault or vehicular homicide even if the victim's occupied the same vehicle.**

(Emphasis supplied.)

Defense counsel was obviously unaware of the impact of these statutory provisions upon Mr. Storms' resentencing. In fact, defense counsel

also argued for consecutive sentences at the low end of the range, with the exception of Count IV.

Count IV involved hit and run - death. It is a nonviolent offense. At the original sentencing hearing the trial court ran Count IV concurrent with the other three (3) counts. On resentencing it ran Count IV consecutive. This issue is discussed more fully in the section involving trial court vindictiveness.

As the Court in *State v. Graham* 181 Wn.2d 878, 337 P.3d 319 (2014) stated at 885:

We take this opportunity to reaffirm that a sentencing judge may invoke .535(1)(g) [RCW 9.94A.535)1)(g)] to impose exceptional sentences both for multiple violent and nonviolent offenses scored under .589(1)(a) and for multiple serious violent offenses under .589(1)(b).

Thus, a trial court has the ability to impose concurrent sentences versus consecutive sentences. It also has the ability to impose consecutive sentences instead of concurrent sentences. Moreover, an exceptional sentence can be imposed based upon aggravating factors.

Since trial counsel failed to argue appropriate statutory law and case law on behalf of Mr. Storms at the resentencing hearing, he did not receive effective assistance of counsel as guaranteed by the Sixth Amendment to the United States Constitution and Const. art. I, § 22.

II. TRIAL COURT VINDICTIVENESS

Mr. Storms' original Judgment and Sentence was four hundred and forty-eight (448) months based upon an offender score of sixteen (16+) plus and the aggravating factors found by the jury. (CP 7)

Mr. Storms appealed to the Court of Appeals. The Court of Appeals determined that the trial court committed error in not suppressing blood test results. The under the influence prong of vehicular homicide was thus negated. (CP 29)

The State then elected to proceed to resentencing on the vehicular homicide - reckless driving alternative. The standard range sentence was reduced from 210 to 280 months to 108 to 144 months. At the high end it resulted in a reduction of one hundred and thirty-six (136) months. (Appendix "A"; Appendix "B")

At the resentencing hearing the trial court ran all four (4) counts consecutive to one another. By running Count IV consecutive to the other three (3) counts the trial court added one hundred and twenty (120) months to Mr. Storms' sentence. This resulted in a total sentence of four hundred and thirty-two (432) months.

Mr. Storms takes the position that when the trial court ran Count IV consecutive to the other counts it acted in a vindictive manner. The Court

of Appeals' decision had impacted the length of the prior sentence substantially.

Moreover, Mr. Storms asserts that no new factors were introduced at the resentencing hearing to compel the trial court to impose a consecutive sentence as to Count IV.

Mr. Storms maintains that the presumption of vindictiveness, as outlined in *State v. Ameline*, 118 Wn. App. 128, 132-33, 75 P.3d 589 (2003), cannot be overcome by the State and that he is entitled to be resentenced with Count IV running concurrent to Counts I, II and III.

The *Ameline* Court based its decision upon *North Carolina v. Pearce*, 395 U.S. 711, 89 S. Ct. 2072, 23 L. Ed.2d 656 (1969). It ruled:

... [T]he United States Supreme Court asked, "When at the behest of the defendant a criminal conviction has been set aside and a new trial ordered, to what extent does the Constitution limit the imposition of a harsher sentence after conviction upon retrial?" The Court held:

A trial judge is not constitutionally precluded ... from imposing a new sentence, whether greater or less than the original sentence, **in the light of events subsequent to the first trial that may have thrown new light upon the defendant's "life, health, habits, conduct, and mental and moral propensities."** Such information may come to the judge's attention from evidence adduced at the

second trial itself, from a new pre-sentence investigation, from the defendant's prison record, or possibly from other sources

The Court noted, however, that the trial court's authority is subject to the following due process limitation:

It can hardly be doubted that it would be a flagrant violation of the Fourteenth Amendment for a state trial court to follow an announced practice of imposing a heavier sentence upon every reconvicted defendant for the explicit purpose of punishing the defendant for his having succeeded in getting his original conviction set aside

Due process of law, then, requires that vindictiveness against a defendant for having successfully attacked his first conviction must play no part in the sentence he receives after a new trial. And since the fear of such vindictiveness may unconstitutionally deter a defendant's exercise of the right to appeal or collaterally attack his first conviction, **due process also requires that a defendant be freed of apprehension of such a retaliatory motivation on the part of the sentencing judge.**

In order to assure the absence of such a motivation, we have concluded that **whenever a judge imposes a more severe sentence upon a defendant after a new trial, the rea-**

sons for his doing so must affirmatively appear. Those reasons must be based upon objective information concerning identifiable conduct on the part of the defendant occurring after the time of the original sentencing proceeding. And the factual data upon which the increased sentence is based must be made part of the record, so that the constitutional legitimacy of the increased sentence may be fully reviewed on appeal.

Thus, *Pearce* creates “a rebuttable presumption of vindictiveness” when the same trial judge presides over two or more trials and the last sentence is “more severe” than earlier ones.

(Emphasis supplied.)

Even though Mr. Storms did not have a second trial, he argues that the reasoning in *Pearce* is equally applicable to a resentencing hearing. In this particular instance, it is apparent that vindictiveness occurred. Running Count IV consecutive to the other three (3) counts, after it had been run concurrent at the first sentencing hearing, basically re-imposed the trial court’s original sentence.

Instead of four hundred and forty-eight (448) months, Mr. Storms is now serving a sentence of four hundred and thirty-two (432) months.

The trial court provided no additional factors to support running Count IV consecutive at the resentencing hearing. The presumption of vindictiveness prevails.

Additionally, defense counsel's failure to challenge the Count IV consecutive sentence prejudicially impacted Mr. Storms and deprived him of his constitutional right to effective assistance of counsel.

CONCLUSION

Mr. Storms did not receive effective assistance of counsel as guaranteed by the Sixth Amendment to the United States Constitution and Const. art. I, § 22 at his resentencing hearing. Trial counsel failed to recognize the fact that the trial court had discretion to impose concurrent sentences.

Defense counsel's failure to argue against consecutive sentencing as to Count IV also adversely prejudiced Mr. Storms' position before the Court. Defense counsel is to advocate for a client; not against a client.

The trial court, in imposing consecutive sentences on all four (4) counts, at the resentencing hearing, acted in a vindictive manner. In effect, the trial court's decision abrogated the benefit that Mr. Storms gained as a result of the Court of Appeals' decision suppressing blood test results.

The trial court should not be allowed, and must not be allowed, to act in a manner that deprives a criminal defendant of the benefits gained following an appeal.

Mr. Storms requests that the Court of Appeals reverse the trial court's sentence, direct the trial court to resentence him on Count IV concurrent to the other three (3) counts as done in his original Judgment and Sentence, and that a new judge be assigned for the resentencing.

DATED this 26th day of October, 2017.

Respectfully submitted,

s/ Dennis W. Morgan

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APPENDIX “A”

VEHICULAR HOMICIDE WHILE UNDER THE INFLUENCE OF INTOXICATING LIQUOR OR ANY DRUG

RCW 46.61.520(1)(a)
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 OFFENDER SCORING RCW 9.94A.525(11)

ADULT HISTORY:

Enter number of Vehicular Homicide and Vehicular Assault felony convictions x 2 = _____
 Enter number of Operation of a Vessel While Under the Influence of Intoxicating Liquor or Any Drug felony convictions x 1 = _____
 Enter number of felony convictions x 1 = _____
 Enter number of Driving While Under the Influence of Intoxicating Liquor or Any Drug and Actual Physical Control While Under the Influence of Intoxicating Liquor or Any Drug and Reckless Driving and Hit-And-Run Attended Vehicle non-felony convictions x 1 = _____

JUVENILE HISTORY:

Enter number of Vehicular Homicide and Vehicular Assault dispositions..... x 2 = _____
 Enter number of Operation of a Vessel While Under the Influence of Intoxicating Liquor or Any Drug felony dispositions x ½ = _____
 Enter number of felony dispositions x ½ = _____
 Enter number of Driving While Under the Influence of Intoxicating Liquor or Any Drug and Actual Physical Control While Under the Influence of Intoxicating Liquor or Any Drug and Reckless Driving and Hit-And-Run Attended Vehicle non-felony convictions x ½ = _____

OTHER CURRENT OFFENSES:

(Other current offenses that do not encompass the same conduct count in offender score)

Enter number of Vehicular Homicide and Vehicular Assault convictions x 2 = _____
 Enter number of Operation of a Vessel While Under the Influence of Intoxicating Liquor or Any Drug felony convictions x 1 = _____
 Enter number of other felony convictions x 1 = _____
 Enter number of Driving While Under the Influence of Intoxicating Liquor or Any Drug and Actual Physical Control While Under the Influence of Intoxicating Liquor or Any Drug and Reckless Driving and Hit-And-Run Attended Vehicle non-felony convictions x 1 = _____

STATUS:

Was the offender on community custody on the date the current offense was committed? (if yes) + 1 = _____

Total the last column to get the **Offender Score** (Round down to the nearest whole number)

SENTENCE RANGE

		Offender Score									
	0	1	2	3	4	5	6	7	8	9+	
LEVEL	90m	100m	110m	119m	129m	139m	170m	185m	215m	245m	
	78 - 102	86 - 114	95 - 125	102 - 136	111 - 147	120 - 158	146 - 194	159 - 211	185 - 245	210 - 280	

- ✓ For attempt, solicitation, conspiracy (RCW 9.94A.595) see page 20 or for gang-related felonies where the court found the offender involved a minor (RCW 9.94A.833) see page 167 for standard range adjustments.
- ✓ For deadly weapon enhancement, see page 170.
- ✓ For sentencing alternatives, see page 160.
- ✓ For community custody eligibility, see page 168.
- ✓ For any applicable enhancements other than deadly weapon enhancement, see page 165.
- ✓ An additional 24 months shall be added to the sentence for each prior offense as defined in RCW 46.61.5055.

The Caseload Forecast Council is not liable for errors or omissions in the manual, for sentences that may be inappropriately calculated as a result of a practitioner's or court's reliance on the manual, or for any other written or verbal information related to adult or juvenile sentencing. The scoring sheets are intended to provide assistance in most cases but do not cover all permutations of the scoring rules. If you find any errors or omissions, we encourage you to report them to the Caseload Forecast Council.

APPENDIX “B”

VEHICULAR HOMICIDE IN A RECKLESS MANNER

RCW 46.61.520(1)(b)
 / [! { { ! ë lh [9b Ç Qw! CCU h CC9b { 9
 OFFENDER SCORING RCW 9.94A.525(11)

ADULT HISTORY:

Enter number of Vehicular Homicide and Vehicular Assault felony convictions x 2 = _____
 Enter number of Operation of a Vessel While Under the Influence of Intoxicating Liquor or Any Drug felony convictions x 1 = _____
 Enter number of felony convictions x 1 = _____
 Enter number of Driving While Under the Influence of Intoxicating Liquor or Any Drug and Actual Physical Control While Under the Influence of Intoxicating Liquor or Any Drug and Reckless Driving and Hit-And-Run Attended Vehicle non-felony convictions x 1 = _____

JUVENILE HISTORY:

Enter number of Vehicular Homicide and Vehicular Assault dispositions x 2 = _____
 Enter number of Operation of a Vessel While Under the Influence of Intoxicating Liquor or Any Drug felony dispositions x ½ = _____
 Enter number of felony dispositions x ½ = _____
 Enter number of Driving While Under the Influence of Intoxicating Liquor or Any Drug and Actual Physical Control While Under the Influence of Intoxicating Liquor or Any Drug and Reckless Driving and Hit-And-Run Attended Vehicle non-felony convictions x ½ = _____

OTHER CURRENT OFFENSES:

(Other current offenses that do not encompass the same conduct count in offender score)

Enter number of Vehicular Homicide and Vehicular Assault convictions x 2 = _____
 Enter number of Operation of a Vessel While Under the Influence of Intoxicating Liquor or Any Drug felony convictions x 1 = _____
 Enter number of other felony convictions x 1 = _____
 Enter number of Driving While Under the Influence of Intoxicating Liquor or Any Drug and Actual Physical Control While Under the Influence of Intoxicating Liquor or Any Drug and Reckless Driving and Hit-And-Run Attended Vehicle non-felony convictions x 1 = _____

STATUS:

Was the offender on community custody on the date the current offense was committed? (if yes) + 1 = _____

Total the last column to get the **Offender Score** (Round down to the nearest whole number)

SENTENCE RANGE

	Offender Score									
	0	1	2	3	4	5	6	7	8	9+
LEVEL VIII	24m 21-27	30m 26-34	36m 31-41	42m 36-48	47.5m 41-54	53.5m 46-61	78m 67-89	89.5m 77-102	101.5m 87-116	126m 103-144

- ✓ For attempt, solicitation, conspiracy (RCW 9.94A.595) see page 20 or for gang-related felonies where the court found the offender involved a minor (RCW 9.94A.833) see page 167 for standard range adjustments.
- ✓ For deadly weapon enhancement, see page 170.
- ✓ For sentencing alternatives, see page 160.
- ✓ For community custody eligibility, see page 168.
- ✓ For any applicable enhancements other than deadly weapon enhancement, see page 165.

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NO. 35295-1-III

COURT OF APPEALS

DIVISION III

STATE OF WASHINGTON

STATE OF WASHINGTON,)
) SPOKANE COUNTY
Plaintiff,) NO. 13 1 00556 6
Respondent,)
)
v.) CERTIFICATE OF SERVICE
)
BRYAN JACOB STORMS,)
)
Defendant,)
Appellant.)
_____)

I certify under penalty of perjury under the laws of the State of Washington that on this 26th day of October, 2017, I caused a true and correct copy of the *BRIEF OF APPELLANT* and to be served on:

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