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Division III
State of Washington
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COURT OF APPEALS
DIVISION III
OF THE STATE OF WASHINGTON

STATE OF WASHINGTON, RESPONDENT

v.

JESSE MATTHEW YOUNG, APPELLANT

APPEAL FROM THE SUPERIOR COURT
OF SPOKANE COUNTY

BRIEF OF RESPONDENT

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I. ISSUES PRESENTED

1. Was the evaluation and competency report conducted and submitted by a qualified developmental disabilities professional as set forth in RCW 10.77?
2. Do the trial court's findings support its determination that the defendant knowingly and voluntarily waived his *Miranda* rights before giving his confession?
3. Was defendant provided ineffective assistance of counsel?

II. STATEMENT OF THE CASE

1. Procedural Background.

On July 31, 2015, Mr. Young was charged with two counts of rape of a child in the first degree and one count of child molestation in the first degree. CP 1-2. Each count alleged an aggravating circumstance of an ongoing pattern of sexual abuse of the same victim manifested by multiple incidents over a prolonged period, the victim being under 18 years of age. RCW 9.94A.535(2)(g)(3)(g); CP 1-2.

On September 4, 2015, an order for stay was entered in the case for the purposes of determining Mr. Young's competency to stand trial and his capacity to understand and waive his constitutional rights. CP 9-13. Because of his identified developmental disabilities, the order included the

requirement that his evaluation include the opinion of a Developmental Disabilities Professional, as defined in RCW 10.77.010(8).¹ The matter was referred to Dr. Lord-Flynn., a staff psychologist at Eastern State Hospital. Daniel Lord-Flynn, Ph.D., is “Qualified as a Developmental Disabilities Professional per RCW 10.77.” CP 190-93. Dr. Lord-Flynn had performed approximately 2000 forensic evaluations, mostly involving RCW 10.77 criminal competency evaluations. RP 80-83. Mr. Young was deemed competent to stand trial and the trial court entered an order on July 5, 2016, finding the defendant competent and able to understand the proceedings and assist in his own defense. CP 14-15.

A CrR 3.5 pretrial hearing on the admissibility of statements made by Mr. Young to law enforcement commenced on August 18, 2017. RP 79. Dr. Lord-Flynn testified regarding Mr. Young’s ability to knowingly and voluntarily waive his *Miranda* rights.² RP 87-110. He concluded that, in his opinion, Mr. Young “likely” had the capacity to knowingly and voluntarily “waive *Miranda*.” RP 97. Detective Elise Robertson testified regarding the

¹ RCW 10.77.010(8) provides: “Developmental disabilities professional” means a person who has specialized training and three years of experience in directly treating or working with persons with developmental disabilities and is a psychiatrist or psychologist, or a social worker, and such other developmental disabilities professionals as may be defined by rules adopted by the secretary.

² *Miranda v. Arizona*, 384 U.S. 436, 444-45, 86 S.Ct. 1602, 16 L.Ed.2d 694 (1966).

circumstances of her and Detective Stormi Koerner's interview of the defendant and his responses. The interview was video-recorded. RP 183-85; CP 146.³ The defendant admitted to both sexual contact and sexual intercourse with F.J. during the interview. The trial court entered findings of fact and conclusions of law, and found the defendant admitted to both sexual contact and sexual intercourse with F.J. and that these admissions were made freely and knowingly under the circumstances. CP 146-49.

2. Substantive Facts.

Because the defendant does not challenge the sufficiency of the evidence supporting his convictions, only a limited factual recitation is provided. In February 2014, Amy Johnson took her then eight-year-old daughter, F.J., to a counseling session with La Donna Remy because of F.J.'s disruptive behavior patterns. RP 26, 311-13. Counseling services were provided through March 2016, with a short break when the family moved from the area. RP 28.

On January 15, 2015, prior to F.J.'s counseling session, Amy Johnson told Ms. Remy that F.J. had downloaded pornography onto a laptop computer. RP 35, 37, 301. Ms. Johnson also revealed that on December 4,

³ The detective's interview was video-taped and was designated as Exhibit P-2 as the "CD of Suspect Interview." P-8 is designated as the Transcript of Interview of Defendant in the Exhibit List set forth at RP 8.

2014, she had discovered bloody tissue and an adult sex toy in F.J.'s closet. RP 37, 695. When asked who had shown her how to download this pornography, F.J. responded that it was the defendant. RP 328, 698-99. At a separate counseling session on February 19, 2015, F.J. disclosed to Ms. Remy that on numerous occasions, while visiting and staying overnight with her grandparents, her uncle, Jesse Young, had touched her vagina with his hand. RP 45, 702-05. She stated this had happened "a lot" since the age of 5. RP 45, 47-48, 704. During another counseling session on May 4, 2015, after attending her first law enforcement forensic interview, F.J. disclosed that Mr. Young had touched her with his penis. RP 48-49, 705.

Because of the disclosure on February 19, 2015, an investigation was initiated into the allegations of sexual assault committed against F.J. by Mr. Young. RP 517. A forensic interview was conducted by Karen Winston on March 18, 2015. RP 116, 390.

Mr. Young was interviewed by detectives of the Spokane Police Department on April 2, 2015. RP 177, 521. The detectives had been informed prior to the interview that Mr. Young had a developmental disability. RP 174, 523. During this interview, Mr. Young wrote a letter of apology to victim F.J. RP 562, 558-59; Ex. 3. He was asked to draw a diagram of the locations where the alleged events took place, which he did. RP 558-59; Ex. 3. During the interview, Mr. Young was asked how many

times he had sexual contact with F.J. and he responded, “a few, four.”
RP 570-71.

A video of the forensic interview conducted by Karen Winston (Ex. P-1) was admitted into evidence. RP 398. A CD of Mr. Young’s interview with the police was also admitted into evidence. Ex. P-2; RP 530.

The matter was submitted to trial by jury on August 22, 2017. A verdict of guilty was returned on all three counts. RP 776; CP 124, 127, 130. The jury also found an ongoing pattern of abuse for each charge.⁴ RP 776; CP 125, 128, 130.

III. ARGUMENT

A. THE COMPETENCY EVALUATION WAS CONDUCTED BY A DEVELOPMENTAL DISABILITIES PROFESSIONAL.

The defendant claims that the competency evaluation ordered by the court required the evaluation to be conducted by a developmental disabilities professional. It does. CP 11. The evaluation and competency report (undesignated by appellant) was conducted and submitted by Daniel Lord-Flynn, Ph.D., a staff psychologist at Eastern State Hospital. CP 194-202. Dr. Lord-Flynn is “Qualified as a Developmental Disabilities Professional per RCW 10.77.” CP 193. Dr. Lord-Flynn has worked in the

⁴ The special finding answered “yes” that the crime was part of an ongoing pattern of sexual abuse of the same victim under the age of 18 years manifested by multiple incidents over a prolonged period of time. CP 125.

forensic unit of Eastern State Hospital since July 1999. CP 191. In his professional capacity, he provides services in the “specialties of: neuropsychology: minority and cultural consultation and training; *developmental disabilities* ... [and] provide[s] supervision to psychologist trainees or others as assigned.” CP 191 (emphasis added).

It was likely understood by those involved in the defendant’s case that Dr. Lord-Flynn was qualified as a forensic psychologist and developmental disabilities professional. The defendant’s claim that “the Court erred in making a finding that Mr. Young competent to stand trial without the input of the statutorily mandated and court ordered developmental disabilities professional”⁵ is unsupported. The trial court ordered the competency evaluation, as requested by the defendant’s counsel, Mr. Jeffrey Compton, and the evaluation was performed by a developmental disabilities professional as ordered by the trial court.

B. THE TRIAL COURT DID NOT ERR BY PERMITTING WITNESSES TO TESTIFY REGARDING THE VOLUNTARINESS OF THE WAIVER OF *MIRANDA* RIGHTS.

The defendant claims the State did not prove he knowingly and voluntarily waived his right to remain silent. Br. of Appellant at 10. This claim is premised on his assertion that Dr. Lord-Flynn was not qualified to

⁵ Br. of Appellant at 9.

testify regarding the circumstances surrounding the voluntariness of defendant's statements because he was not a qualified developmental disability professional. Br. of Appellant at 10-14. Again, this argument fails because Dr. Lord-Flynn was, and is, a developmental disabilities professional.

Moreover, the defendant inexplicably attempts to metamorphose the *statutory requirement* that the competency evaluation of a developmentally disabled person be performed by a developmental disabilities professional, into a legal *foundational requirement* that testimony regarding the circumstances surrounding a confession given by a person with a developmental disability may only be offered by someone that is a developmental disabilities professional. The defendant provides no support for this proposition and this Court need not address it.⁶

Additionally, any claim regarding the admissibility of Dr. Lord-Flynn's testimony regarding Mr. Young's *Miranda* waiver and his ability to resist falsely confessing was unpreserved, and, any error in this regard

⁶ Without argument or authority to support it, an assignment of error is waived. *Smith v. King*, 106 Wn.2d 443, 451-52, 722 P.2d 796 (1986); *State v. Dennison*, 115 Wn.2d 609, 629, 801 P.2d 193 (1990); *see also* RAP 10.3(a)(6) (appellate brief should contain argument supporting issues presented for review, citations to legal authority, and references to relevant parts of the record).

was also invited. Indeed, the defendant requested Dr. Lord-Flynn offer an opinion regarding Mr. Young's capacity to waive *Miranda* as well as an opinion regarding Mr. Young's vulnerability to making a false confession. *See* CP 199 (Dr. Lord-Flynn addressing Mr. Compton's concerns that Mr. Young might not have understood his rights and may have been vulnerable and made a false confession).⁷ After requesting this evaluation, and after the completion of the evaluation, *defense counsel also agreed to the admission and use of this report at the CrR 3.5 hearing:*

MR. MARTIN (Prosecutor). Have you ever seen recordings of people without mental disabilities waiving their rights to silence or to an attorney in a situation that seemed like it was really kind of against their interest to do so?

Dr. LORD FLYNN: I have.

MR. MARTIN. Did you prepare a report outlining your findings?

Dr. LORD FLYNN. Yes, I did.

MR. MARTIN. And was that report accurate as to your conclusions at the time that you made it?

Dr. LORD FLYNN. Insofar as my professional judgment for those issues, yes.

MR. MARTIN. And was that a report that was filed with the court when you completed it?

⁷ It is not known why counsel for defendant failed to designate the competency evaluation report and its opinions on the defendant's capacity to waive *Miranda* and its opinions regarding the defendant's vulnerability to making a false confession.

Dr. LORD FLYNN. Yes, it is.

MR. MARTIN: Your Honor, I'd move at this time to incorporate the report, not as an exhibit, but since it's already in the court file, incorporate it by reference in terms of the doctor's testimony just to supplement that and give the court some more information about some of the questions that the defendant was asked and some of the answers that he provided.

THE COURT: Mr. Compton?

MR. COMPTON: I have no objection for this hearing.

MR. MARTIN: And it is limited to this hearing, Judge.

THE COURT: Understood. I will incorporate it for that purpose only.

MR. MARTIN: And do you maintain the conclusions that you reached in that report here today? A. Yes, I do.

RP 103-104 (emphasis added)

There was no objection to this testimony and the introduction of the report; therefore, any issue regarding the report's admission into evidence for the purposes of the CrR 3.5 hearing is not reviewable on appeal. RAP 2.5; *State v. Strine*, 176 Wn.2d 742, 749, 293 P.3d 1177 (2013); *State v. Stoddard*, 192 Wn. App. 222, 228, 366 P.3d 474 (2016). Moreover, the defendant requested that Dr. Lord-Flynn perform the evaluation,⁸ and thereafter agreed to its use for the purposes of the CrR 3.5 hearing. Any

⁸ CP 148 (Findings of Fact 19).

error in this regard was invited and therefore not appealable. A defendant who invites error – even constitutional error – may not later claim that the error requires a new trial. *State v. Smith*, 122 Wn. App. 294, 299, 93 P.3d 206 (2004). “To hold otherwise would put a premium on defendants misleading trial courts.” *State v. Henderson*, 114 Wn.2d 867, 868, 792 P.2d 514 (1990); *State v. Studd*, 137 Wn.2d 533, 546, 973 P.2d 1049 (1999) (defendant may not set up an error at trial and complain about it on appeal).

The trial court properly heard the testimony of Dr. Lord-Flynn regarding competency and how the defendant’s background and disabilities affected his statements and his ability to understand what he was doing. *Compare State v. Sisouvanh*, 175 Wn.2d 607, 618, 290 P.3d 942 (2012):

However, the trial court referred to Dr. Strandquist as a “highly trained professional” and relied on his report in determining that Sisouvanh was competent to stand trial, and the trial court also explicitly rejected a later motion to disqualify Dr. Strandquist from testifying at trial, which was based on the very same argument concerning Dr. Strandquist's cultural competence. Thus, the trial court clearly found that Dr. Strandquist's competency evaluation was conducted in a qualified manner.

The testimony of the law enforcement officers that were present at the waiver and questioning of the defendant was fully admissible and reviewable by the trial court; the defendant cites no case requiring a law enforcement officer to have special developmental disability training to

testify as to *the circumstances* surrounding the waiver of *Miranda* and to the statements made by the defendant. Again, no objection was made at the trial court level. RAP 2.5.

The defendant does not take issue or assign error to the trial court's factual findings regarding the confession procedure. RP 146-48. These detailed findings are supported by the record. The rule to be applied in confession cases is that findings of fact entered following a CrR 3.5 hearing are verities on appeal if unchallenged, and, if challenged, they are verities if supported by substantial evidence in the record. *State v. Broadaway*, 133 Wn.2d 118, 131, 942 P.2d 363 (1997). The party challenging a finding of fact bears the burden of demonstrating that the finding is not supported by substantial evidence. *State v. Vickers*, 148 Wn.2d 91, 116, 59 P.3d 58 (2002). Here, the record supports the trial court's findings of fact and conclusions of law that the defendant waived his rights and that his confession was admissible. CP 146-49. First, the confession procedure was video-recorded⁹ which allowed the trial court to observe the defendant's demeanor and responses at the interview and supports the court's findings that "the defendant appeared to the Court to understand his rights and to voluntarily waive them"; and that he "appeared to the Court to understand

⁹ CP 147 (Finding of Fact 2).

the questions posed during the interview and to answer them voluntarily.” CP 147 (Findings of Fact 14 and 15). The trial court found “the detectives employed no coercive or otherwise unlawful or improper techniques during the interview.” CP 148 (Finding of Fact 17). These unchallenged factual findings of the trial court support its conclusion of law that the defendant was “properly advised of and voluntarily waived his rights, including his rights to counsel and to silence, rendering his subsequent statements admissible under CrR 3.5.” CP 148 (Conclusion of Law 2).

C. THERE IS NO SHOWING THAT COUNSEL WAS INEFFECTIVE.

1. Standard of Review.

To establish ineffective assistance of counsel, Mr. Young must show that his attorney’s performance was deficient and that he was prejudiced by the deficiency. *Strickland v. Washington*, 466 U.S. 668, 104 S.Ct. 2052, 80 L.Ed.2d 674 (1984); *In re Pers. Restraint of Crace*, 174 Wn.2d 835, 840, 280 P.3d 1102 (2012). The first element of *Strickland* is met by showing that counsel’s performance was not reasonably effective under prevailing professional norms. The second element is met by showing a reasonable probability that, but for counsel’s unprofessional errors, the result would have been different. *State v. McNeal*, 145 Wn.2d 352, 362, 37 P.3d 280 (2002). “There is a strong presumption that trial counsel’s

performance was adequate, and exceptional deference must be given when evaluating counsel's strategic decisions." *Id.*

2. Discussion.

The defendant claims that his seasoned trial counsel, Mr. Compton,¹⁰ was ineffective for failing to challenge the qualifications of Dr. Lord-Flynn as a developmental disabilities professional. The defendant also claims Mr. Compton was ineffective because he failed to obtain his own expert on "that subject and Mr. Young's ability to knowingly and voluntarily waive his constitutional rights." Br. of Appellant at 17.

The first claim fails because, again, Dr. Lord-Flynn was a developmental disabilities professional; it is more than likely that learned counsel, Mr. Compton, knew of his credentials.¹¹

The appellate test for counsel incompetence is whether, after an examination of the whole record, the court can conclude appellant received effective representation and a fair trial. *State v. Ciskie*, 110 Wn.2d 263, 284, 751 P.2d 1165 (1988). The complete record establishes that Mr. Compton did not just idly sit by, but strongly advocated on behalf of his client, Mr. Young. We know that Mr. Compton agreed to allow Dr. Lord-Flynn to

¹⁰ WSBA #24082, admitted to practice November 1994.

¹¹ Attorney Jeffrey Compton was present at all of the interviews Dr. Lord-Flynn had with his client, Mr. Young. CP 195.

testify as to the defendant's cognitive abilities, *but* objected to his testimony on the effect police interrogation had or did not have on Mr. Young. RP 634-35. This objection was sustained. RP 637. He objected to leading questions in general and to child hearsay. RP 329, 397. He objected to any testimony from Ms. Remy without her being subject to cross-examination.¹² Mr. Compton also objected to Detective Robertson speculating on whether, in her experience *in other cases*, confessions occur because someone wants to spare victims and families a full investigation. RP 550. That objection was sustained. Mr. Compton was also sustained on a basic hearsay objection, RP 588, as well as an opinion objection as to the honesty of the victim. RP 697. A speculation objection was sustained regarding whether the victim's mother had knowledge prior to the pornography disclosure by the victim regarding who had shown her the pornography, RP 700, and whether the victim was spontaneous, RP 701, and whether the victim seemed truthful to her counsellor, RP 701-02.

Mr. Compton also was able to introduce expert controverting testimony from Richard Leo, Ph.D., a professor of psychology and criminology at UC Irvine, in Southern California from 1997 to 2006. Dr. Leo testified that his "expertise and research interest [was] the study of

¹² This forced the State to have Ms. Remy testify in person, and that subjected her to cross-examination.

police investigation, police interviewing, police interrogation, the statements, admissions, and confessions that they sometimes elicit, especially coerced or false confessions and erroneous convictions in the criminal justice system.” He noted his work had been cited by “too many [courts] to name,” RP 418, including being cited several times by the United States Supreme Court, RP 419. Professor Leo was able to testify at length to his concerns regarding the circumstances surrounding the interrogation to Mr. Young in this case:

But what my primary concerns were is twofold: One is the techniques that I regarded as promises and threats implied in context, those techniques are very likely, if somebody is innocent, to elicit false or unreliable confessions. Those techniques are high-risk techniques. The other thing that concerned me -- my background is in social psychology, so I'm not a clinical psychologist, I don't give tests. But in my field I'm an expert in a body of literature where clinical psychologists, people who are psychologists of personality, write about individual vulnerabilities. And it was clear to me that Mr. Young had vulnerabilities. We talked about the low IQ. He mentioned during the interrogation that he was slow-learning -- he had a slow-learning disability. He mentioned that he had short-term memory loss. He mentioned that he was exhausted, and he said at the very beginning, though I think only once, that he was depressed. And these things concern me. These, I think, were signs that he has a weak or potentially a very weak personality to withstand pressures of -- of sustained interrogation.

RP 457-58.

Defendant's counsel obtained an expert for trial; that this expert could not change the facts surrounding the recorded interview of the

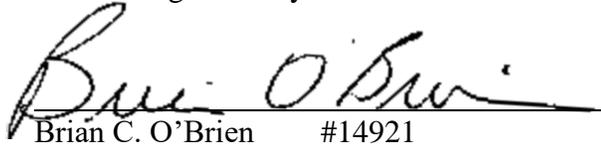
defendant or the ultimate findings of the trial court. This does not establish an ineffective assistance of counsel claim. Mr. Young fails to establish either prong of an ineffective assistance of counsel argument – his argument condensed is that his counsel was ineffective because he did not prevail.¹³

IV. CONCLUSION

The evaluation and competency report was conducted and submitted by a qualified developmental disabilities professional as set forth in RCW 10.77. The trial court’s findings support its determination that the defendant knowingly and voluntarily waived his *Miranda* rights before giving his confession. The defendant was provided ineffective assistance of counsel. There was no error in this case.

Dated this 28 day of August, 2018.

LAWRENCE H. HASKELL
Prosecuting Attorney



Brian C. O'Brien #14921
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Attorney for Respondent

¹³ As to the existence of experts who would refute Dr. Lord-Flynn, the record does not indicate how many experts defense counsel contacted, or how many were not used because they would not help, but would hurt the case. Any claim regarding potential experts in this regard is a better subject for a personal restraint petition. If a defendant wishes to raise issues on appeal that require evidence or facts not in the existing trial record, the appropriate means of doing so is through a personal restraint petition *State v. McFarland*, 127 Wn.2d 322, 335, 899 P.2d 1251 (1995).

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION III

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JESSE YOUNG,

Appellant,

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CERTIFICATE OF
SERVICE

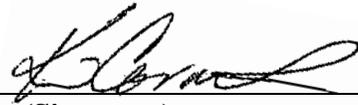
CERTIFICATE OF SERVICE

I certify under penalty of perjury under the laws of the State of Washington, that on August 28, 2018, I e-mailed a copy of the Brief of Respondent in this matter, pursuant to the parties' agreement, to:

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8/28/2018
(Date)

Spokane, WA
(Place)


(Signature)

SPOKANE COUNTY PROSECUTOR

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