

FILED
Court of Appeals
Division III
State of Washington
8/29/2018 9:09 AM

No. 35843-7-III

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

STATE OF WASHINGTON, Respondent

v.

DAVID RAMOS, Appellant

APPEAL FROM THE SUPERIOR COURT
OF SPOKANE COUNTY
THE HONORABLE TIMOTHY B. FENNESSEY

BRIEF OF APPELLANT - AMENDED

Marie J. Trombley, WSBA 41410
PO Box 829
Graham, WA
253-445-7920

TABLE OF CONTENTS

| | |
|--|----|
| I. ASSIGNMENTS OF ERROR..... | 1 |
| II. STATEMENT OF FACTS..... | 3 |
| III. ARGUMENT..... | 9 |
| A. Ineffective Assistance Of Counsel Deprived Mr. Ramos Of His Sixth And Fourteenth Amendment Right To Counsel..... | 9 |
| B. The Domestic Violence Designation Must Be Stricken..... | 17 |
| IV. CONCLUSION..... | 19 |

TABLE OF AUTHORITIES

Federal Cases

| | |
|---|----|
| <i>Michelson v. United States</i> , 335 U.S. 469, 69 S.Ct. 213, 93 L.Ed. 168 (1948)..... | 13 |
| <i>Strickland v. Washington</i> , 466 U.S. 668, 104 S.Ct. 2052, 80 L.Ed.2d 674 (1984)..... | 9 |
| <i>United States v. Mendenhall</i> , 446 U.S. 544, 100 S.Ct. 1870, 64 L.Ed.2d 497 (1980)..... | 16 |

Washington State Cases

| | |
|--|----|
| <i>In re Davis</i> , 152 Wn.2d 647, 101 P.3d 1 (2004)..... | 9 |
| <i>State v Magers</i> , 164 Wn.2d 174, 189 P.3d 126 (2008)..... | 10 |
| <i>State v. Armenta</i> , 134 Wn.2d 6, 948 P.2d 1280 (1997) | 16 |
| <i>State v. Cross</i> , 156 Wn.2d 580, 132 P.3d 80 (2006) | 9 |
| <i>State v. Estes</i> , 193 Wn. App. 479, 372 P.3d 163 (2016)..... | 14 |
| <i>State v. FortunCebada</i> , 158 Wn. App. 158, 241 P.3d 800 (2010). 12 | |
| <i>State v. Grier</i> , 171 Wn.2d 17, 246 P.3d 1260 (2011)..... | 12 |
| <i>State v. Gunderson</i> , 181 Wn.2d 916, 337 P.3d 1090 (2014) | 10 |
| <i>State v. Hinton</i> , 179 Wn.2d 862, 319 P.3d 9 (2014) | 15 |
| <i>State v. Kylo</i> , 166 Wn.2d 856, 215 P.3d 177 (2009)..... | 9 |
| <i>State v. Lough</i> , 125 Wn.2d 847, 889 P.2d 487 (1995)..... | 13 |
| <i>State v. McFarland</i> , 127 Wn.2d 322, 899 P.2d 1251 (1998)..... | 12 |
| <i>State v. O.P.</i> , 103 Wn. App. 889, 13 P.3d 1111 (2000) | 18 |
| <i>State v. Roden</i> , 179 Wn.2d 893, 321 P.3d 1183 (2014) | 15 |
| <i>State v. Saltarelli</i> , 98 Wn.2d 358, 655 P.2d 697 (1982) | 11 |
| <i>State v. Thang</i> , 145 Wn.2d 630, 41 P.3d 1159 (2002)..... | 11 |

Constitutional Provisions

| | |
|---------------------------------|------|
| U.S. Const. Amend. IV | 16 |
| U.S. Const. Amend. VI..... | 1, 9 |
| U.S. Const. Amend. XIV | 1, 9 |
| Wash. Const. art. I, § 22 | 9 |

Statutes

| | |
|---------------------|----|
| RCW 10.99.020 | 17 |
| RCW 10.99.050 | 18 |
| RCW 9.73.030 | 14 |
| RCW 9.73.040 | 14 |
| RCW 9.73.050 | 15 |
| RCW 9.73.090 | 14 |
| RCW 9.94A.728..... | 18 |

Court Rules

| | |
|-------------|------------|
| ER 404..... | 11, 14, 17 |
|-------------|------------|

I. ASSIGNMENTS OF ERROR

- A. Ineffective assistance of counsel deprived Mr. Ramos of his Sixth and Fourteenth Amendment right to counsel.

Issues Related To Assignment of Error A.

1. Admissibility of prior acts of domestic violence is limited to instances where the state has established their overriding probative value, such as to explain a witness's otherwise inexplicable recantation or conflicting account of events. Did Mr. Ramos's attorney provide ineffective assistance of counsel when he consented to the admission of unfairly prejudicial evidence without objection or court analysis?

2. A defense attorney provides ineffective assistance of counsel by failing to challenge illegal searches. Did Mr. Ramos's attorney provide ineffective assistance of counsel by failing to object to the admission of evidence acquired in violation of Washington's Privacy Act?

B. The sentencing court erred when it entered a judgment and sentence stating that domestic violence was pled and proved on Counts 1-5.

Issues Related To Assignment of Error B.

1. The information charging Mr. Ramos with counts 1, 2, 3, and 5 designated those counts as "domestic violence."

Count 4 had no domestic violence designation.

Nevertheless, the jury was instructed by special verdict form to consider count 4 in making its determination.

2. The court instructed the jury to leave the special verdict form blank if the jury could not agree whether the state had proved a domestic relationship for Counts 1-5. Following the court instructions, the jury left the special verdict form blank. The sentencing court calculated the offender score and checked the preprinted box on the judgment and sentence signifying that domestic violence had been pled and proven on those counts. Must this finding be stricken?

II. STATEMENT OF FACTS

Charges and Motions In Limine

Spokane County Prosecutors charged David Ramos by amended information with: (I) First-degree robbery, (II) Kidnapping first-degree, (III) second-degree rape, (IV) first-degree rape, (V) second-degree assault, and (VI) violation of a no-contact order. Charged crimes I, II, III, and V were alleged to have been committed against a family or household member. CP 56-57. Count IV had no allegation of domestic violence. CP 57.

Before trial, the prosecution presented a motion in limine to allow E.M. to testify regarding prior domestic violence between herself and Mr. Ramos. CP 74. In response, defense counsel said:

Now, I am already agreeing that the victim's comments that he -- my client has been abusive in the past. We're not objecting to that. That's fine. And I'm not making an objection. We've thought and talked about it. So, if she wants to testify that he's been abusive with her throughout the course of the relationship, we actually are fine with that coming in.

RP 312.

Trial Testimony

Shortly before 5 p.m. on December 7, 2015, someone backed a car into the driveway of Debra and Steven Piper. Mr.

Piper went outside, heard a woman screaming for help, and saw a man putting her into the trunk of a car. RP 776-777. Mr. and Mrs. Piper called 911 and gave the operator a license plate number. RP 760, 763, 768.

Officer Turman responded to the Piper home. He eventually got a cell phone number for a woman, E.M., associated with the vehicle. RP 1113-14, 1119. At 7:30 pm Officer Turman spoke with E.M. by phone. RP 1120. She agreed to meet with him at Burger King to show him she was safe. RP 1122.

At Burger King, she declined to go with him to the police station for a recorded statement. He told her she was in "possession of a vehicle that had been seen involved in a kidnapping." RP 959. She agreed to go, and Officer Turman drove her to the station, leaving her car at a local restaurant. RP 959. At the police station, E.M. told Officer Turman she did not want to have a recorded conversation with him. RP 1133. He later testified:

So, I informed her, 'I have no choice, but I'm going to seize your cell phone.' I asked her for her cell phone. She told me she didn't want to give it to me, so it had to progress to me saying, 'I'm actually going to take it from you because I want the text messages. I believe there could be text messages on there that may help me identify which party you were involved with today.'

RP 1135.

He further testified:

There was some discussion about her cell phone. She told me that it was the only way she could contact her son. So, I explained to her that **I was taking her phone**, because it was apparent that she was not going to try to protect herself, and if she was not going to try to protect herself, I was going to do everything I could to protect her. **She indicated that she wanted to leave. I told her that she was – she could leave but she's not leaving with that cell phone**, because I believed that there was a potential that she could be murdered, and if she was not going to protect herself, **that cell phone may have evidence in it** that can help me solve a future murder.

RP 1137.

He took her phone from her. RP 1135. When she wanted to call her sister to find out where her child was, the officer said:

... I did give her phone back but said, 'You're going to make that call on speaker phone **so I can make sure you're not deleting anything from your phone.**' So, I allowed her to make the phone call but had her do it on speaker.

RP 1135.

Officer Turman said, "After I made that statement to her about taking her phone, **she knew I was going to keep her phone**" and she agreed to talk. RP 1137-38. He looked at the text messages and call log on her phone, which included calls and texts from Mr. Ramos. RP 1172-73.

Officers were directed to look for Mr. Ramos in an alley near a mini-mart¹. RP 1068. They arrested him shortly after midnight on December 8, 2015. RP 1068.

Trial Testimony of E.M.

E.M. testified that she and David Ramos had a secret relationship. RP 881-883. On December 7, 2015, she and Mr. Ramos spent the better part of the day together. RP 886, 892. She reported that over the course of the day he pushed her, hit her, bit her, and took her wedding ring from her². She testified, without objection, that Mr. Ramos had been physically violent toward both her and his wife. RP 883-884.

Around 5:30 p.m., Mr. Ramos put her in the trunk of her car and drove her to his home. RP 902-903, 920, 930. There, she said he raped and choked her, and threatened her with a knife. RP 939-944.

Later, she drove them to a 7-Eleven store. After returning a phone call to her boss, and learning the police were trying to contact her, she spoke with a detective around 7:30 p.m. She

¹ It was unclear from the record what information the police had that would enable them to update patrol officers on Mr. Ramos's real-time location.

² E.M. and Mr. Ramos were both married to other people at the time of this incident. RP

agreed to meet to show him she was safe. RP 948-49, 951, 954-55. 956, 1122.

Jury Instructions, Verdict, Sentencing

The court gave jury instruction number 40:

You will also be given a special verdict form for the crimes charged in Counts I, II, III, IV, and V. If you find the defendant not guilty do not use the special verdict form. If you find the defendant guilty of these crimes, you will then use the special verdict form and fill in the blank with the answer " yes" or " no" according to the decision you reach. In order to answer the special verdict form "yes," you must unanimously be satisfied beyond a reasonable doubt that " yes" is the correct answer. If you unanimously agree that the answer to the question is "no," you must fill in the blank with the answer " no." If after full and fair consideration of the evidence you are not in agreement as to the answer, then do not fill in the blank for that question.

CP 147.

The jury found Mr. Ramos guilty of the charged crimes, leaving blank the special verdict form. CP 165-174.

CN: 201501046331
SN: 115
PC: 1

FILED
NOV 15 2017
Timothy W. Fitzgerald
SPOKANE COUNTY CLERK

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SPOKANE

| | | |
|---------------------|---|----------------------|
| STATE OF WASHINGTON |) | |
| |) | |
| Plaintiff, |) | No. 15-1-04633-1 |
| |) | |
| v. |) | SPECIAL VERDICT FORM |
| |) | COUNTS I-V |
| DAVID RAMOS, |) | |
| Defendant. |) | |

We, the jury, return a special verdict by answering as follows:

QUESTION: Was DAVID RAMOS in a dating relationship with **E.M.** on December 7, 2015?

ANSWER: _____ (Write "yes" or "no")

DATE: _____

Presiding Juror

CP 175³. RP 1359.

At the sentencing hearing the state argued for the highest end of the sentencing range, stating, "And this is also a crime, Your Honor, where *the jury found there was a domestic violence situation*, and we would argue that *that in and of itself* with the history and the fact this was intimate-partner violence certainly warrants the high end." RP 1373. (emphasis added). The court imposed a 374-month sentence. CP 195. Mr. Ramos makes this timely appeal. CP 207.

³ The special verdict form has been redacted to provide initials rather than the full name of E.M.

III. ARGUMENT

A. Ineffective Assistance Of Counsel Deprived Mr. Ramos Of His Sixth And Fourteenth Amendment Right To Counsel.

Article I, section 22 of the Washington State Constitution guarantees every criminal defendant the right to effective assistance of counsel. *Strickland v. Washington*, 466 U.S. 668, 685-86, 104 S.Ct. 2052, 80 L.Ed.2d 674 (1984); *In re Davis*, 152 Wn.2d 647, 672, 101 P.3d 1 (2004). To succeed on a claim of ineffective assistance of counsel, the defendant must show deficient performance and prejudice. *Strickland*, 466 U.S. at 895.

Counsel's performance is deficient if it falls below an objective standard of reasonableness based on the relevant circumstances and "prevailing professional norms." *Strickland*, 466 U.S. at 688; *State v. Kylo*, 166 Wn.2d 856, 862, 215 P.3d 177 (2009). To show prejudice, the defendant must show that the relevant ~~relevant~~ error undermines confidence in the outcome of the trial. *Strickland*, 466 U.S. at 694. Ineffective assistance of counsel claims are reviewed *de novo*. *State v. Cross*, 156 Wn.2d 580, 605, 132 P.3d 80 (2006).

1) Defense Counsel Was Ineffective For Failing To Object To The State's Motion To Introduce Propensity Evidence.

In a pretrial motion, the prosecutor wanted to introduce evidence that E.M. had experienced physical violence from Mr. Ramos and was aware he had been physically violent toward his wife. The purported purpose was to show E.M.'s decision-making process, to rebut any *potential* credibility challenges, and for the "res gestae" of the crimes. RP 305.

Statements about prior acts of domestic violence, involving the defendant and the complaining witness are admissible to assist the jury in judging the credibility of a *recanting witness* who has given *conflicting statements* about the defendant's conduct. *State v. Magers*, 164 Wn.2d 174, 186, 189 P.3d 126 (2008). In *State v. Gunderson*, 181 Wn.2d 916, 337 P.3d 1090 (2014), the Court held that where the alleged victim *does not* recant or contradict any prior statement, *it is error* to admit evidence of prior acts of domestic violence against her. *Id.* at 922.

Here, the detective testified that E.M.'s statements were consistent throughout the investigation. RP 1194. E.M. had not recanted, nor had she contradicted any prior statements. Defense counsel provided ineffective assistance of counsel by failing to

object to the introduction of prior domestic violence allegations where the facts did not warrant admission of the statements under *Gunderson*. It would have been error for the trial court to admit the statements over defense objections.

Admission of E.M.'s testimony on the prior domestic violence allegations had the prohibited effect of declaring something about Mr. Ramos's character and showing he acted in conformity with that character on this occasion. ER 404(b); *State v. Saltarelli*, 98 Wn.2d 358, 362, 655 P.2d 697 (1982).

Prior to admission of ER 404(b) evidence, the trial court must (1) find a preponderance of the evidence the prior acts occurred, (2) identify the purpose for which the evidence is sought to be introduced, (3) determine whether the evidence is relevant to prove an element of the crime charged, and (4) weigh the probative value against the prejudicial effect of the evidence. *In doubtful cases, the evidence should be excluded. State v. Thang*, 145 Wn.2d 630, 641, 41 P.3d 1159 (2002).

Here, by failing to object to the testimony, trial counsel relinquished Mr. Ramos's right to have the state prove to the court by a preponderance of the evidence that the alleged prior acts occurred. The evidence was not relevant to any element of the

crimes charged, and the prejudicial effect of the evidence significantly outweighed its probative value. Without objection, the jury could consider that because E.M. said something happened before it must have happened this time. And although she had no direct knowledge, E.M. was allowed to testify that Mr. Ramos told her he had hurt his wife. Such testimony was irrelevant, highly prejudicial, and counsel's failure to object was unreasonable.

Where there is not a legitimate strategic or tactical basis for the attorney's trial decisions, an attorney provides constitutionally inadequate representation. "The relevant question is not whether counsel's choices were strategic, but whether they were reasonable." *State v. McFarland*, 127 Wn.2d 322, 336-36, 899 P.2d 1251 (1998); *State v. Grier*, 171 Wn.2d 17, 34, 246 P.3d 1260 (2011).

"Where a claim of ineffective assistance of counsel rests on a trial counsel's failure to object, the defendant must show that an objection would likely have been sustained." *State v.*

FortunCebada, 158 Wn. App. 158, 172, 241 P.3d 800 (2010).

Here, when defense counsel told the court he was not objecting to introduction of the alleged prior bad acts, the court nevertheless, questioned the prosecutor, saying, "...because I've read the

materials. I've read your exhibit binder. And I heard, or at least I saw, the victim's -- the alleged victim's statement about, if I push this hard, if I push that hard, all of those issues. I don't recall anything during that alleged victim's statement that he said he'd done it before. Did I miss that part of it?" RP 313-14; 316-17. It is more than likely the court would have sustained the objection as there was no strategic or tactical reason to have Mr. Ramos unfairly prejudicially portrayed to the jury, and the statements had no relevance to the charged crimes.

Washington courts recognize that evidence of prior misconduct is likely to be highly prejudicial. *State v. Lough*, 125 Wn.2d 847, 862, 889 P.2d 487 (1995). "To guard against this heightened prejudicial effect, we confine the admissibility of prior acts of domestic violence to cases where the State has established their overriding probative value." *Gunderson* 181 Wn.2d at 925. Here, the jury was not likely to forget E.M.'s statements about past physical violence. Even if the prior misconduct could be construed as highly probative, it may still be inadmissible because it may "weigh too much with the jury and ...overpersuade them." *Michelson v. United States*, 335 U.S. 469, 476, 69 S.Ct. 213, 93 L.Ed. 168 (1948).

Failure to object to the ER 404(b) evidence allowed and encouraged the jury to consider Mr. Ramos as one with a propensity to commit a crime when rendering its verdict. Had the overly prejudicial evidence been excluded, the result of Mr. Ramos's trial may have been different. Mr. Ramos was denied effective assistance of counsel and this Court should reverse his convictions and remand for a new trial.

- 2) Mr. Ramos's attorney provided ineffective assistance of counsel by failing to object to the admission of evidence acquired in violation of Washington's Privacy Act.

An attorney's ignorance of a point of law fundamental to his case is a clear example of the unreasonable performance of his duties. *State v. Estes*, 193 Wn. App. 479, 489-490, 372 P.3d 163 (2016). Where counsel does not know the law and fails to research it, he cannot weigh alternatives and does not make informed decisions about tactics. *Id.* Here, defense counsel did not object to or question the seizure of the iPhone which contained private text messages from Mr. Ramos and which led to his location and arrest.

The Washington State Privacy Act prohibits anyone not operating under a court order from intercepting or recording certain communications without the consent of all parties. RCW 9.73.030,

.040, .090(2). It is one of the most restrictive electronic surveillance laws in the nation and offers a greater degree of protection to Washingtonians than its federal counterpart. *State v. Roden*, 179 Wn.2d 893, 898, 321 P.3d 1183 (2014). **Evidence obtained in violation of the act is inadmissible for *any* purpose at trial.** RCW 9.73.050. (emphasis added).

The Privacy Act protects text messages. *Roden*, 179 Wn.2d at 900, 902; *State v. Hinton*, 179 Wn.2d 862, 319 P.3d 9 (2014). In *Roden*, the defendant sent text messages to a friend in an attempt to buy heroin. A detective had gained control of the seller's iPhone, opened, read, and responded to the text messages. When Mr. Roden arrived to make the exchange, he was arrested for attempted possession of heroin. *Roden*, 179 Wn.2d at 897.

In reversing, the Supreme Court held that the Privacy Act encompassed text messages and answered whether the text messages were *intercepted* under the act. *Id.* at 904. The detective's manipulation of the phone, response to previous texts and interception of incoming texts led the Court to conclude the officer had unlawfully intercepted the texts. *Id.* at 906.

Here, the detective insisted he needed to keep the cell phone because he might need to later solve a murder. However,

there was no exigent circumstance that would justify his seizure of the cell phone or his reading of the existing and incoming messages. RP 1173. E.M. was safe.

The officer specifically told E.M. she could leave, but he intended to keep the cell phone. This resulted in an unlawful seizure. An individual is seized for Fourth Amendment purposes only if under the circumstances, a reasonable person would not believe he was free to leave. *United States v. Mendenhall*, 446 U.S. 544, 554, 100 S.Ct. 1870, 64 L.Ed.2d 497 (1980). In *State v. Armenta*, 134 Wn.2d 6, 12, 948 P.2d 1280 (1997), the Court concluded that an officer seized the defendant when he took the defendant's money and put it in his patrol car for "safe keeping." Taking and keeping E.M.'s phone from her resulted in an unlawful seizure of her person and her phone.

Aside from the unlawful seizure, the officer's logic fails. If she was not safe outside the police station, she was a victim, not a perpetrator, and it made no sense to keep her only means of communication. If she was safe inside the precinct, it made no sense to take her phone without permission. The detective seized the phone because he wanted a name and location of a suspect. From the record, it can reasonably be concluded that police used

the cell phone information to track Mr. Ramos's exact location and arrest him. ⁴

Failure to object to the admission of evidence obtained in violation of the Washington Privacy Act violated Mr. Ramos's right to a fair trial assisted by competent counsel. The evidence from the text messages and missed phone calls from Mr. Ramos were used to support the credibility of E.M.'s testimony against Mr. Ramos. RP 1172-73. The cumulative effect of failure to object to ER 404(b) evidence and evidence obtained in violation of the Washington Privacy Act amounts to ineffective assistance of counsel. The remedy is reversal of the convictions and remand for a new trial. *Estes*, 193 Wn. App. at 495.

B. The Domestic Violence Designation Must Be Stricken.

If an offense is found to be committed by one family or household member against another, it can be designated as a "domestic violence" offense. RCW 10.99.020(3). Once such a designation is made, sentencing courts are authorized to impose enhanced penalties such as specialized no-contact orders, the

⁴ The detective testified: "The number that belonged to Mr. Ramos, that phone called her phone. Shortly after that, he was arrested with that phone on his person." RP 1203.

violation of which constitutes a separate crime. RCW 10.99.050(2); *State v. O.P.*, 103 Wn. App. 889, 892, 13 P.3d 1111 (2000). This designation also results in reduced earned early release time. RCW 9.94A.728(1)(a).

As an initial matter, the information alleged a domestic relationship only for counts 1, 2, 3 and 5. The jury instruction incorrectly included count 4. CP 56-57, 147.

The jury instruction provided:

You will also be given a special verdict form for the crimes charged in **Counts I, II, III, IV, and V**. If you find the defendant not guilty do not use the special verdict form. If you find the defendant guilty of these crimes, you will then use the special verdict form and fill in the blank with the answer " yes" or " no" according to the decision you reach. In order to answer the special verdict form "yes," you must unanimously be satisfied beyond a reasonable doubt that " yes" is the correct answer. If you unanimously agree that the answer to the question is "no," you must fill in the blank with the answer " no." If after full and fair consideration of the evidence you are not in agreement as to the answer, then do not fill in the blank for that question.

CP 147.

The court's instruction permitted the jury to make a finding of domestic violence for count IV, which had not been charged in the information. But the jury followed the court's instruction and left the special verdict form blank. *The jury did not find beyond a*

reasonable doubt there was a domestic relationship between E.M. and Mr. Ramos. At sentencing, the state relied on the domestic violence designation as a basis to recommend imposition of the high end of the sentencing range. The court checked the box on the judgment and sentence form showing that domestic violence had been pled and proven. This was error, and the finding must be stricken. To the extent the sentencing court relied on the incorrect finding, Mr. Ramos's sentence must be reconsidered, given the jury's actual finding.

IV. CONCLUSION

Based on the foregoing facts and authorities, Mr. Ramos respectfully asks this Court to vacate his convictions and remand for a new trial. In the alternative, Mr. Ramos is entitled to have his judgment and sentence corrected to reflect the jury verdict and a resentencing in light of the corrected finding.

Respectfully submitted this 29th day of August 2018.

Marie Trombley

Marie Trombley
WSBA 41410
PO Box 829
Graham, WA 98338

CERTIFICATE OF SERVICE

I, Marie Trombley, do hereby certify under penalty of perjury under the laws of the State of Washington, that on August 29, 2018, I mailed to the following US Postal Service first class mail, the postage prepaid, or electronically served, by prior agreement between the parties, a true and correct copy of the Appellant's Opening Brief - Amended to the following: Spokane County Prosecuting Attorney at SCPAAppeals@spokanecounty.org and to David Ramos/DOC#871325, Monroe Correctional Center- TRU- PO Box 888. Monroe, WA 98272.

Marie Trombley

Marie Trombley
WSBA 41410
PO Box 829
Graham, WA 98338

MARIE TROMBLEY

August 29, 2018 - 9:09 AM

Transmittal Information

Filed with Court: Court of Appeals Division III
Appellate Court Case Number: 35843-7
Appellate Court Case Title: State of Washington v. David Ramos
Superior Court Case Number: 15-1-04633-1

The following documents have been uploaded:

- 358437_Briefs_20180829090835D3611719_6964.pdf
This File Contains:
Briefs - Appellants
The Original File Name was Ramos AOB AMENDED.pdf
- 358437_Motion_20180829090835D3611719_2233.pdf
This File Contains:
Motion 1 - Other
The Original File Name was Ramos Motion Amended AOB.pdf

A copy of the uploaded files will be sent to:

- bobrien@spokanecounty.org
- scpaappeals@spokanecounty.org

Comments:

Amended

Sender Name: Valerie Greenup - Email: valerie.mtrombley@gmail.com

Filing on Behalf of: Marie Jean Trombley - Email: marietrombley@comcast.net (Alternate Email:)

Address:
PO Box 829
Graham, WA, 98338
Phone: (253) 445-7920

Note: The Filing Id is 20180829090835D3611719