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Court of Appeals
Division III
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No. 37222-7-III

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

STATE OF WASHINGTON, Respondent

v.

CHAUN HERKIMER, Appellant

APPEAL FROM THE SUPERIOR COURT
OF SPOKANE COUNTY
THE HONORABLE JUDGE CHARNELLE M. BJELKENGREN

BRIEF OF APPELLANT

Marie J. Trombley, WSBA 41410
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253-445-7920

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I. ASSIGNMENT OF ERROR

- A. Chaun Herkimer was unlawfully seized and arrested in violation of his rights under art. I, § 7 of the Washington Constitution and the Fourth Amendment to the United States Constitution.

ISSUES RELATED TO ASSIGNMENT OF ERROR

- A. Where a trial attorney fails to move to suppress, this Court may review the error under an ineffective assistance of counsel. The Court may review the error under RAP 2.5(a). Where an adequate record exists, should this Court review the manifest constitutional error raised for the first time on appeal?
- B. Was Mr. Herkimer unlawfully arrested in violation of his constitutional rights to be free from disturbance in his private affairs without authority of law?

II. STATEMENT OF FACTS

A. PROCEDURAL FACTS

Spokane County prosecutors charged Chaun Herkimer with residential burglary, burglary in the second degree, and malicious mischief in the third degree. CP 6.

1. CrR 3.5 Hearing

Before trial, the State moved to introduce statements made by Mr. Herkimer. CP 39-40. Spokane County Deputy Cinkovich (“Cinkovich”) testified at a CrR 3.5 hearing. RP 82.

On January 23, 2019, Cinkovich was dispatched to 3911 East Fourth Avenue in North Spokane RP 83. The nature of the complaint was “somebody called in and said that the front door had been kicked in.” RP 83. Because he was at an intersection about a half block from the residence, he turned around and headed south toward the home. RP 85. Cinkovich turned off his car lights. RP 86. He reported he saw shoeprints in the snow, leading away from the residence. In his patrol car he followed the shoeprints. RP 86.

He did not know where the prints headed or ended but saw a Jeep Cherokee driving southbound on Myrtle Street and followed the car to stop it. RP 87-88. He said the last time he noticed the footprints was “right by the car” driving by him. RP 88.

He slowly drove around looking for the Jeep, following some tire tracks. RP 89. He did not know if the tire tracks he saw were the only tire tracks on the road. RP 90. He noticed a Jeep Cherokee parked in a driveway, with exhaust coming from the tailpipe. RP 90. He ordered the driver to show his hands and called

for backup assistance. RP 90. The car occupants did not get out of the car, but when backup officers arrived with a loudspeaker, Mr. Herkimer (“Herkimer”) and Stacy Price got out of the vehicle. RP 91-92.

Deputies handcuffed Herkimer and Ms. Price. Cinkovich testified he “immediately” advised Mr. Herkimer of his *Miranda* rights. RP 92; CP 114 (Findings of Facts 12 and 13). He placed Herkimer in the back of a patrol car. RP 92. Cinkovich asked Herkimer if he knew why he was being detained and Mr. Herkimer told him it was “probably because he was driving around Mead at an odd time of the night and parked in a stranger’s driveway.” RP 94. Cinkovich was not sure if Herkimer told him he was driving to or from a gas station. RP 95,100.

After informing Mr. Herkimer he was detained as part of a burglary investigation, Cinkovich asked to see the soles of Mr. Herkimer’s shoes. RP 94. Cinkovich wanted to see if the shoes matched the shoeprints he had driven by earlier near the Third Street address. RP 94. He reported one sole had a burn mark, and an AND1 pattern. RP 95, 97. Herkimer reportedly said his shoes were AND1's, a popular brand sold at Walmart, and “a lot of people in Mead have them.” RP 95.

Cinkovich called the officer at the Brock residence and described the shoe sole. RP 98. He said he got confirmation the sole matched the shoe prints in the snow, and seized the shoes and placed Mr. Herkimer under arrest. RP 98.

The trial court found Mr. Herkimer waived his constitutional rights and agreed to answer questions. The court entered written findings of fact and conclusions of law. CP 116. There was no CrR 3.6 hearing.

B. JURY TRIAL

The matter proceeded to a jury trial and Cinkovich's testimony was similar to his testimony at the CrR 3.5 hearing.

911 dispatched Spokane County Deputy Cinkovich to an address on E. Fourth Avenue in north Spokane about 3:34 a.m., on the morning of January 23, 2019. RP 119. Because he was at an intersection less than 100 feet away he turned his car around to get to the site of the reported residential burglary. RP 120.

With his car lights turned off, he observed shoe prints in the snow leading away from the residence on the northside of Fourth Avenue. RP 120, 123. As he got to a neighbor's property, he observed a Jeep Cherokee driving southbound on Myrtle Street. He reported the Jeep "immediately drew my attention because it's

coming from an area where they're leading, so I believed it was related." RP 122.

Cinkovich detoured from the burglary site at the Brock residence and followed the Jeep. RP 122. He drove slowly down Myrtle and turned on Third Avenue, having observed tire tracks. RP 123. He could not recall if there were more than one set of tire tracks on the street. RP 124. He located the Jeep in a driveway, exhaust coming out of the tail pipe. RP 124.

Cinkovich had the blue police lights on and gave verbal commands to the driver of the car to show his hands; he also called for backup assistance. RP 125. Cinkovich thought the car, which was about 50 feet away from him, was still running. RP 125, 142. Three deputies arrived at his location. RP 126. A fourth deputy went to the reported burglary site. RP 126-27. A deputy used a PA system to announce commands to the driver and passenger to get out of the car. RP 128.

Cinkovich handcuffed the driver, Mr. Herkimer, and immediately gave *Miranda* warnings to him. RP 128, 132. Cinkovich agreed Mr. Herkimer was handcuffed and given *Miranda* warnings without any information there was a burglary; but, because he was driving south on Myrtle Street at 3:33 a.m. RP 146. Cinkovich also

agreed his report stated that Mr. Herkimer was arrested before there was confirmation that Ms. Brock's home had been broken into. At trial he said Mr. Herkimer had not been arrested, but merely 'detained' when he had been handcuffed and given *Miranda* warnings. RP 146.

Sergeant Kiehn of the Spokane Sheriff's Department testified that aside from Mr. Herkimer having been driving through the area, there was nothing tying him to the alleged crime when he was stopped, handcuffed and given his *Miranda* warnings. RP 204.

Cinkovich reported Mr. Herkimer believed he was stopped because he was driving at an odd time and had pulled into a stranger's driveway. RP 133. He said he was either going to a friend's home from the gas station or headed to the gas station from a friend's home. RP 136, 156-57.

Although Cinkovich had not stopped to look at the shoeprints near the Brock residence, and did not know where the prints led, he asked to look at Herkimer's shoes. RP 133, 155. He seized the shoes to assist deputies at the actual scene with a description of the shoe. RP 134-35. It was not until after Mr. Herkimer had been arrested and the area was cleared that Cinkovich examined the prints in the snow at the residence. RP 139-40. Sergeant Kiehn

testified that when he went to confirm the shoe prints matched Mr. Herkimer's shoes, he did not have the shoes with him at the Brock residence. He reported he did not compare the shoe sole to the snow print, but just used his recollection of what he had seen. RP 212. He did not have training in footwear tracking. RP 210-11.

Deputies later photographed the shoeprints coming and going from the Brock residence, as well as north, across the street to a neighbor's home. RP 252. Law enforcement did not contact the neighbors. RP 252.

Sergeant Kiehn could not say whether the shoe print photos (Exhibits 68 and 69) were taken at the scene of the crime, or whether they had been taken in the driveway where Mr. Herkimer had been arrested. RP 213-14.

Ms. Brock had many locks and security devices on her property because the shop and garage had been broken into several times. RP 73-74. When she called 911 to report the intrusion, she told officers she only saw a dark figure running down the porch. RP 74. She saw a cardboard box at the foot of her padlock to the garage door of the Brock property had been pulled out and cut, the door pried open and the door frame damaged. RP 239-40. A deadbolt on the residence door was also broken. RP 69-

70. No pry bar or bolt cutter was found at the Brock residence or in Mr. Herkimer's car. RP 147, 240, 255, 257.

The jury convicted Mr. Herkimer on all counts. CP 86-88. He makes this timely appeal. CP 118-19.

III. ARGUMENT

A. Mr. Herkimer Was Unlawfully Seized And Arrested.

Where defense counsel has not challenged an unlawful seizure and arrest nor moved to suppress evidence, this Court may review the error not raised at trial if it is a "manifest error affecting a constitutional right." RAP 2.5(a)(3). To show an error is manifest, the appellant must show actual prejudice. *State v. McFarland*, 127 Wn.2d 322, 333, 899 P.2d 1251 (1995).

The reviewing Court may address the claim if the record is sufficient to determine whether the suppressed motion would have been granted. "When an adequate record exists, the appellate Court may carry out its long-standing duty to assure constitutionally adequate trials by engaging in review of manifest constitutional errors raised for the first time on appeal." *State v. Contreras*, 92 Wn. App. 307, 313, 966 P.2d 915 (1998) (citing *State v. Riley*, 121 Wn.2d 22, 31, 846 P.2d 1365 (1993)).

This Court may also review a claim for the first time on appeal where a defendant has been deprived of his constitutional guarantees of effective assistance of counsel. The Sixth Amendment to the United States Constitution and art. I, § 22 of the Washington Constitution guarantee a defendant the right to effective assistance of counsel. Ineffective assistance of counsel is a manifest error affecting a constitutional right and can be raised for the first time on appeal. RAP 2.5(a)(3); *McFarland* 127 Wn.2d at 333.

A claim of ineffective assistance of counsel presents a mixed question of law and fact, which this Court reviews de novo. *In re Pers. Restraint of Fleming*, 142 Wn.2d 853, 865, 16 P.3d 610 (2001). Effective assistance of counsel requires an attorney to perform to the standards of the profession. *McFarland*, 127 Wn.2d at 334-35. A defendant is denied his right to effective assistance of counsel where the attorney's conduct falls below a minimum objective standard or reasonable attorney conduct, and there is a probability that but for that conduct the outcome would be different. *Strickland v. Washington*, 466 U.S. 668, 687-88, 80 L.Ed.2d 674, 104 S.Ct. 2052 (1984).

A legitimate trial strategy or tactics cannot serve as the basis for ineffective assistance of counsel, however, the strategic decisions must be reasonable. *State v. Kylo*, 166 Wn.2d 856, 864, 215 P.3d 177 (2009); *State v. Grier*, 171 Wn.2d 17, 34, 246 P.3d 1260 (2011). If they are unreasonable, the Court may find ineffective assistance of counsel.

Here the record is more than adequate to demonstrate there was no reasonable strategy or legitimate tactic to explain counsel's failure to challenge the unwarranted seizure of Mr. Herkimer. *State v. Reichenbach*, 153 Wn.2d 126, 131, 101 P.3d 80 (2004).

1. Deputies Unlawfully Seized Mr. Herkimer.

The issues before this Court on review are twofold: first, was Mr. Herkimer unlawfully seized in a *Terry* investigation; and second, whether Mr. Herkimer was unlawfully arrested without probable cause. The answer to both questions is yes.

Individuals are protected from unwarranted seizures by the Fourth Amendment to the U.S. Constitution. Art. I, § 7 of the Washington Constitution provides even greater protection to individuals, guaranteeing "No person shall be disturbed in his private affairs, or his home invaded without authority of law."

The burden falls to the State to show a warrantless seizure falls into one of the few and narrowly drawn exceptions to the warrant requirement. *State v. Weyand*, 188 Wn.2d 804, 811, 399 P.3d 530 (2017). Under the *Terry* exception, an officer may briefly detain a person for questioning, without a warrant, if he has reasonable suspicion the person is engaged in criminal activity. *Terry v. Ohio*, 392 U.S.1, 88, S.Ct. 1868, 20 L.Ed.2d 889 (1968). The suspicion must be grounded in specific and articulable facts: such objective facts must connect a particular person to the particular crime the officer seeks to investigate. *Id.*; *State v. Bliss*, 153 Wn. App. 197, 204, 222 P.3d 107 (2009). The facts must go far beyond a generalized suspicion. *Id.* The State must show by clear and convincing evidence the *Terry* stop was justified. *State v. Doughty*, 170 Wn.2d 57, 239 P.3d 573 (2010).

2. Cinkovich Did Not Have Reasonable Suspicion Of Criminal Activity Grounded In Specific And Articulate Facts Justifying An Unwarranted Seizure of Mr. Herkimer.

The justification for following Mr. Herkimer's car rather than going to the Brock residence was because the last time Cinkovich noticed the shoeprints was "right by the car" driving by him. RP 88. He reported the Jeep "immediately drew my attention because it's

coming from an area where they're leading, so I believed it was related." RP 122.

The explanation that the last time he noticed shoeprints was by the car driving by him is difficult to understand: the car was moving "at a speed too fast for conditions" when Cinkovich saw it. RP 122. Cinkovich followed Mr. Herkimer's car and seized him because he was driving south on Myrtle Street at 3:30 in the morning. RP 146. This justification does not meet the requirements under *Terry*.

A *Terry* stop requires a well-founded suspicion the defendant has engaged in criminal conduct. *Doughty*, 170 Wn.2d at 62. As the Court in *Glover* noted, when reviewing the merits of an investigatory stop, the Court must evaluate the totality of the circumstances presented to the officer. *State v. Glover*, 116 Wn.2d 509, 514, 806 P.2d 760 (1991).

At the time of the seizure, the circumstances presented were (1) a 911 report a front door had been broken into (2) shoeprints in the snow near the residence and (3) a car drove by at 3:30 am. The objective facts here do not and did not connect a particular person to the particular crime.

The *Terry* stop rules prevent police from acting on hunches because “[a]nything less would invite intrusions upon constitutionally guaranteed rights based on nothing more substantial than inarticulate hunches.” *Terry*, 392 U.S. at 22. Our Supreme Court found there were no valid grounds for a *Terry* stop even though officers had (1) identified the house as a drug house, (2) there had been complaints from the neighbors, (3) Doughty visited the house at 3:20 am and (4) his visit was less than two minutes. *Id. Doughty*, 170 Wn.2d at 62. There, the Court found the facts did not present reasonable and articulable suspicion of criminal activity and suppressed the evidence. *Id.* at 65.

Similarly, in *Fuentes* the facts relied on to justify the stop included (1) Sandoz’s surprise when he saw the officer (2) “conflicting” stories between Sandoz and the driver, (3) Sandoz was pale and shaking (4) the officer did not recognize the jeep and (5) the officer had authority to admonish nonoccupants for loitering under a trespass agreement. *State v. Fuentes*, 183 Wn.2d 149, 160, 352 P.3d 152 (2015). The Court held the facts were insufficient, noting that nothing the officer observed suggested Sandoz was engaged in criminal activity.

The circumstances used to justify the seizure in this case are likewise insufficient. Observing shoeprints in the snow and seeing a car drive by do not meet the constitutional standard of proving by clear and convincing evidence there was a reasonable and articulable suspicion of criminal activity directly related to Mr. Herkimer. The seizure was unlawful.

3. Mr. Herkimer Was Unlawfully Arrested.

Warrantless searches and seizures are presumed invalid unless an exception to the Fourth Amendment and art. I, § 7 applies. *State v. Snapp*, 174 Wn.2d 177, 188, 275 P.3d 289 (2012). Where an officer has no independent evidence to connect an individual to illegal activity, no probable cause exists and his arrest is invalid under art. I, § 7. *State v. Grande*, 164 Wn.2d 135, 142, 187 P.3d 248 (2008). The State bears the burden of establishing probable cause. *State v. Thompson*, 151 Wn.2d 793, 803, 92 P.3d 228 (2004).

“An arrest takes place when a duly authorized officer of the law manifests an intent to take a person into custody and actually seizes or detains such person.” *State v. Patton*, 167 Wn.2d 379, 387, 219 P.3d 651 (2009) (quoting 12 Royce A. Ferguson Jr., Washington Practice Criminal Practice and Procedures § 3104 at

741 (3d ed. 2004)). Under *Reichenbach*, the question is whether a reasonable person under the circumstances would consider himself under arrest. *Reichenbach*, 153 Wn.2d at 135.

A suspect is in custody if a reasonable person in his position would believe his movements were restricted to a degree associated with formal or custodial arrest. *Id.* at 135; *State v. Radka*, 120 Wn. App.43, 49, 83 P.3d 1038 (2004). The hallmarks of arrest are handcuffing a suspect, placing the suspect in a patrol car, and telling the suspect he is under arrest. *State v. Ortega*, 177 Wn.2d 116, 128, 297 P.3d 57 (2013). The advisement of *Miranda* rights is required after arrest and would lead a reasonable person to believe he was under arrest. *State v. Marcum*, 149 Wn. App. 894, 911, 205 P.3d 969 (2009).

Before there was confirmation of a burglary at the Brock residence Mr. Herkimer was ordered out of his car. He was handcuffed. An officer may handcuff a suspect during a *Terry* stop, he must articulate a reason for it: dangerousness or risk of flight. *State v. Gering*, 146 Wn. App. 564, 567, 192 P.3d 935 (2008). Here, there was no reason articulated, and no testimony that Mr. Herkimer was threatening, dangerous, or would try to escape.

In *Gering*, the officer asked Gering to step outside, and then handcuffed him. Even without telling him he was under arrest, the officer never told him he was free to leave. On appeal, the Court determined it was at that moment Gering was arrested. *Id.*

Cinkovich was very clear he advised Mr. Herkimer of his *Miranda* rights “immediately.” Mr. Herkimer had every reason to believe he was under arrest because by any measure the officer manifested an intent to arrest him by taking him into custody and advising him of his rights.

What is missing is probable cause for the arrest. Cinkovich arrested Mr. Herkimer before having confirmation of the burglary and before he seized Mr. Herkimer’s shoes. Officers may not “seek to verify their suspicions by means that approach the conditions of arrest.” *State v. Gonzales*, 46 Wn. App. 388, 396, 731 P.2d 1101 (1986). The invasion of Mr. Herkimer’s privacy by arrest without probable cause amounted to an illegal arrest under both the state and federal constitutions.

4. Evidence Seized From Mr. Herkimer Should Be Suppressed As Fruit of the Poisonous Tree.

In an unconstitutional search or seizure, all subsequently uncovered evidence is fruit of the poisonous tree and must be

suppressed. *State v. Ladson*, 138 Wn.2d 343, 359, 979 P.2d 833 (1999). “If the initial stop is unlawful, the subsequent search and fruits of that search are inadmissible as fruits of the poisonous tree.” *State v. Kennedy*, 107 Wn.2d 1, 4, 726 P.2d 445 (1986).

Here, the deputy testified after the unlawful arrest he seized the shoes. The shoe evidence must be suppressed.

IV. CONCLUSION

Based on the foregoing facts and authority, Mr. Herkimer respectfully asks this Court to reverse and dismiss the convictions with prejudice.

Respectfully submitted this 12th day of June 2020.



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CERTIFICATE OF SERVICE

I, Marie Trombley, do certify under penalty of perjury under the laws of the State of Washington, that on June 12, 2020, I mailed to the following US Postal Service first class mail, the postage prepaid, or electronically served, by prior agreement between the parties, a copy of the Appellant's Opening Brief to: Spokane County Prosecuting Attorney at SCPAAppeals@spokanecounty.org and to Chaun Herkimer/DOC#362944, Larch Corrections Center, 5314 NE Dole Valley Road, Yacolt, WA 98675.

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