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SUPREME COURT
STATE OF WASHINGTON
Feb 14, 2014, 4:39 pm
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IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON ,

Respondent,

v.

PAMELA D. DESKINS,

Petitioner.

NO. 88140-5

STATEMENT OF
ADDITIONAL
AUTHORITIES

COMES NOW the petitioner, State of Washington, by and through, Pamela B. Loginsky, Special Deputy Prosecuting Attorney for Stevens County, and respectfully requests that the Court consider the following additional authority pursuant to RAP 10.8:

Allen v. Municipality of Anchorage, 168 P.3d 890 (Alas. App. 2007) (prohibiting defendant, who was convicted of animal cruelty, from possessing animals was reasonably related to her rehabilitation and to protecting the public)

State v. Barker, 128 Ohio App. 3d 233, 714 N.E.2d 447, 459-460 (1998) (defendant's conditions of probation, which ordered her to forfeit all of her dogs and not just those she had abused, exceeded the penalty for the offense itself, was proper)

United States v. Margala, 662 F.2d 622, 627 (9th Cir. 1981)

(condition of probation that required defendant to forfeit retirement benefits and stock that he acquired in the course of conducting business with the victim company was affirmed as "reasonably related" to rehabilitation)

Respectfully submitted this 14th day of February, 2014.

Washington Association of Prosecuting Attorneys

By: 

Pamela B. Loginsky, WSBA #18096
Staff Attorney
206 10th Ave. SE
Olympia, WA 98501
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E-mail: pamloginsky@waprosecutors.org

PROOF OF SERVICE

Today I sent by electronic mail and deposited in the mail of the United States of America, postage prepaid, a properly stamped and addressed envelope directed to the following counsel:

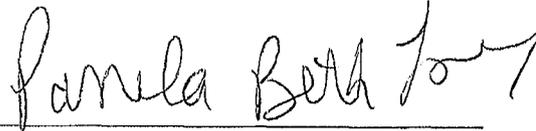
Attorney for Petitioner Pamela Deskins
Casey Grannis
Nielsen Broman Koch, PLLC
1908 East Madison Street
Seattle, WA 98122

grannisc@nwattorney.net

containing a copy of the document to which this proof of service is attached.

I certify under penalty of perjury of the laws of the State of Washington
that the foregoing is true and correct.

Signed this 14th day of February, 2014, at Olympia, Washington

A handwritten signature in cursive script that reads "Pamela B. Loginsky". The signature is written in black ink and is positioned above a horizontal line.

Pamela B. Loginsky
WSBA 18096

OFFICE RECEPTIONIST, CLERK

From: OFFICE RECEPTIONIST, CLERK
Sent: Friday, February 14, 2014 4:40 PM
To: 'Pam Loginsky'; Casey Grannis; Patrick Mayovsky <MayovskyP@nwattorney.net>
Subject: RE: State v. Deskins, No. 88140-5

Rec'd 2-14-14

Please note that any pleading filed as an attachment to e-mail will be treated as the original. Therefore, if a filing is by e-mail attachment, it is not necessary to mail to the court the original of the document.

From: Pam Loginsky [mailto:Pamloginsky@waprosecutors.org]
Sent: Friday, February 14, 2014 4:39 PM
To: OFFICE RECEPTIONIST, CLERK; Casey Grannis; Patrick Mayovsky <MayovskyP@nwattorney.net>
Subject: State v. Deskins, No. 88140-5

Dear Clerk and Counsel:

Attached, for filing, is the State's Statement of Additional Authorities. Please let me know if you should experience any difficulty in opening this document.

Sincerely,

Pam Loginsky
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