

SUPREME COURT
OF THE STATE OF WASHINGTON

KATHLEEN MANCINI

Petitioner,

v.

CITY OF TACOMA,

Respondent.

NO. 97583-3

RESPONDENT'S
STATEMENT OF
ADDITIONAL
AUTHORITIES

Respondent City of Tacoma submits this statement of additional authorities in accordance with RAP 10.8.

1. In answer to the Court's questions about why the officer did not do a controlled buy before obtaining the warrant:

RP 57:19 – 58:21 (wherein Ms. Haskell asked the officer questions about whether he did not do a controlled buy because he did not want to do the King County paperwork);

RP 278:4 – 280:7 (wherein officer testified that he did not do a controlled buy because the CI did not know if she could get back into the apartment; her presence in the apartment was fortuitous and during her meeting in the apartment, there was no offer to allow the CI to buy drugs. Further, based on the officer's past experience with King County, it was more likely that the CI's identity would be disclosed by the Prosecutor's Office without notice to the officer. Applying for a controlled substance warrant did not require the officer disclose the CI's identity.)

Respectfully submitted this 7th day of May, 2020.

WILLIAM C. FOSBRE, City Attorney

By: /s/Jean P. Homan
JEAN P. HOMAN, WSB #27084
Deputy City Attorney
Attorney for Respondent

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DECLARATION OF SERVICE

On May 7, 2020, I electronically filed the foregoing with the Clerk of the Court, which will send notification of such filing to the following:

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Original E-filed with:
Supreme Court
Clerk's Office

I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct

DATED: May 7, 2020 at Edgewood, Washington.

/s/Britt K. Pittman
Britt K. Pittman, Paralegal
Tacoma City Attorney's Office

TACOMA CITY ATTORNEYS OFFICE

May 07, 2020 - 11:50 AM

Transmittal Information

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