

**COURT OF APPEALS, DIVISION II
OF THE STATE OF WASHINGTON**

In re the Personal Restraint Petition of:

ISAAH E. PRESTON,

Petitioner.

RESPONSE OF THE
INDETERMINATE
SENTENCE REVIEW
BOARD

Respondent, the Indeterminate Sentence Review Board (ISRB or Board), responds to Preston’s personal restraint petition pursuant to RAP 16.9. Preston is serving a prison sentence for crimes committed prior to his 18th birthday. He claims he is entitled to a hearing for early release under RCW 9.94A.730(1) after serving 20 years of confinement minus his early release time. However, the statute expressly states that a person may petition the Board “for early release after serving no less than 20 years of confinement.” By its plain language, it does not allow release prior to 20 years, regardless of how much early release time an inmate has earned.

I. BASIS OF CUSTODY

Preston is in the Washington Department of Corrections’ custody pursuant to two convictions, the latest-running of which is a King County conviction by plea to first degree rape, committed on December 22, 1998, when Preston was 14 years old. Exhibit 1, Judgment and Sentence. The superior court (the Honorable Robert A. Jones) sentenced him to 378

months of confinement and 36 months of community custody. *Id.* at 4. His early release date is currently in 2031. Exhibit 2, Offender Management Network Information (OMNI) Legal Face Sheet, at 1 (“ERD: 03/26/2031”).

II. STATEMENT OF THE CASE

Preston is serving concurrent sentences for first and second degree rape. Exhibit 3, OMNI View J&S (causes “AC” and “AD”). His second degree rape conviction is the earliest-starting of the two sentences. Exhibit 3 (showing “Time Start Date”). That conviction has a prison term of 8,522 days, which is over 23 years. *Id.*

For purposes of calculation, if one assumes Preston was arrested 99 days prior to his DOC time-start date on cause AC (because he received credit for 99 days of jail time), his arrest date would be October 25, 2001.¹ *See* Exhibit 3 (showing “Time Credits”). His early release date on that sentence is 20 years, 5 months, and 21 days after that presumptive arrest date. Specifically, his early release date for cause AC is April 15, 2022.² *Id.*

¹ This is the same date he pleaded guilty, as well. *See* Exhibit 1 to Personal Restraint Petition of Preston.

² This is based on early release credits at the rate of 15 percent of the sentence, plus the fact that Preston received 99 days of credit for jail time served and 17 days of credit for jail early release time, and the fact that since he has been in prison, he has lost 230 days of good conduct time and has failed to earn 3.59 days of earned time. Exhibit 3.

In contrast, simply adding 20 years to October 25, 2001, results in a date of October 25, 2021. Thus, Preston's early release date under RCW 9.94A.729 is almost six months later than the 20-year mark in his prison term.

In October 2014, Preston, through counsel, asked the Board to subtract his early release credits received under RCW 9.94A.729 from his 20-year mark, for purposes of petitioning for release under RCW 9.94A.730(1). Exhibit 4, Letter from Jeffrey Ellis. If Preston does not lose anymore good conduct time and if he earns all of his remaining earned time, his early release credits under RCW 9.94A.729 would total 1,044, rounded down.³ That is almost three years of early release credits. Hence, Preston is essentially asking to be released under RCW 9.94A.730 after 17 years.

The Board responded to his request by explaining that it does not interpret RCW 9.94A.730 as allowing it to subtract early release credits under RCW 9.94A.729 from the 20 years required to be served before a release under RCW 9.94A.730. Exhibit 5, Letter from Jill Getty.

III. STANDARD OF REVIEW

A petitioner who challenges a decision from which he has had "no previous or alternative avenue for obtaining state judicial review" must show

³ This is based on multiplying 15 percent by his total sentence length of 8,522 days, then subtracting the early release credits he has so far lost while at the DOC.

that he is under restraint and the restraint is unlawful. *In re Pers. Restraint of Cashaw*, 123 Wn.2d 138, 148-49, 866 P.2d 8 (1994); RAP 16.4(a), (c). Under RAP 16.4, a petitioner may obtain relief by showing either a constitutional violation or a violation of state law. RAP 16.4(c)(2), (6); *see Cashaw*, at 148. Further, in challenges to the Board's time-credit calculations, it is a petitioner's burden to show that the Board's actions were so arbitrary and capricious as to deny the petitioner a fundamentally fair proceeding so as to work to the offender's prejudice. *Cf. In re Grantham*, 168 Wn.2d 204, 292, ¶ 13, 227 P.3d 285 (2010) (declining to reverse a prison discipline decision).

A petitioner must set forth a statement of "the facts upon which the claim of unlawful restraint of petitioner is based and the evidence available to support the factual allegations, . . . [and] why the petitioner's restraint is unlawful for one or more of the reasons specified in rule 16.4(c)." RAP 16.7(a)(2). However, bare assertions and conclusory allegations of constitutional violations are insufficient to support a personal restraint petition. *In re Pers. Restraint of Rice*, 118 Wn.2d 876, 886, 828 P.2d 1086 (1992).

Inmates have no liberty interest in being released before serving the full maximum sentence. *In re McCarthy*, 161 Wn.2d 234, 240, ¶ 12, 164 P.3d 1283 (2007); *In re Marler*, 108 Wn. App. 799, 807, 33 P.3d 743

(2001) (citing *Greenholtz v. Inmates of Nebraska Penal and Correctional Complex*, 442 U.S. 1, 7, 99 S. Ct. 2100, 60 L. Ed. 2d 668 (1979)). The statutory language of RCW 9.94A.730(3), in particular, gives offenders only a limited liberty interest in releasability hearings. *Id.* 161 Wn.2d at 245, ¶ 19 (interpreting identical language in RCW 9.95.420(3)(a)). To protect offenders' limited liberty interest, due process requires that offenders have minimum procedural protections at releasability hearings. *Id.* Further, RCW 9.94A.730(3) requires the Board to “*give public safety considerations the highest priority* when making all discretionary decisions regarding the ability for release and conditions of release.” RCW 9.94A.730(3) (emphasis added). Based on this language, the Board can legitimately be seen as a guarantor of the public's safety.

An offender may seek relief by way of a personal restraint petition if he demonstrates that the Board failed to follow its own rules. *Cashaw*, 123 Wn.2d at 150. Otherwise, all Board decisions are subject to review only for an abuse of discretion. *In re Dyer*, 175 Wn.2d 186, 196, 283 P.3d 1103 (2012). An abuse of discretion may be found where the Board fails to follow its own procedural rules for parolability hearings or where the Board bases its decision on speculation and conjecture only. *Dyer*, 175 Wn.2d at 196 (citing *In re Dyer (Dyer II)*, 164 Wn.2d 274, 286, 189 P.3d

759 (2008)). “The petitioner bears the burden to prove the [Board] abused its discretion.” *Id.* (citation omitted).

The Court must approach the Board’s decisions “with substantial deference” because “the courts are *not* a super [Board] and will not interfere with a [Board’s] determination in this area unless the [Board] is first shown to have *abused its discretion . . .*.” *Dyer*, 175 Wn.2d at 196 (emphasis in original; quotation marks and citations omitted). The courts “will not substitute their discretion for that of the [Board].” *Id.* (quotation marks and citations omitted). A prisoner is “subject entirely to the discretion of the [Board], *which may parole him now or never.*” *Dyer*, 175 Wn.2d at 197 (emphasis in original; quotation marks and citations omitted).

IV. ISSUE PRESENTED

Does RCW 9.94A.730(1) require an inmate to serve a full 20 years, without subtraction of RCW 9.94A.729 early release credits, before the Board can release the inmate early after a petition under RCW 9.94A.730?

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///

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///

V. ARGUMENT

RCW 9.94A.730 Does Not Allow the Board to Release and Inmate Earlier than 20 years after Arrest

Preston claims he should be able to petition for release after only 17 years, instead of the 20 years specified in RCW 9.94A.730, based on subtraction of early release credits earned under RCW 9.94A.729. But RCW 9.94A.730 expressly states that inmates must serve the full 20 years: “[A]ny person convicted of one or more crimes committed prior to the person's eighteenth birthday may petition the indeterminate sentence review board for early release after serving *no less than twenty years* of total confinement” (Emphasis added). The phrase “no less than twenty years” can mean only one thing: no less than 20 years. Preston claims the statute is ambiguous. But it clearly is not.

Preston claims that if he is not allowed to petition for a release after only 17 years, this will have the effect of retroactively reducing his early release credits, in violation of the Ex Post Facto Clause. But this is incorrect. Under pre-existing statutes, if Preston were to receive his current amount of early release credits under RCW 9.94A.729 and did not lose anymore, and if one ignored Preston’s longer-running first degree rape sentence, he would release after serving 20 years, five months, and 21

days. It makes no sense to claim that an even earlier release of 20 years under RCW 9.94A.730 will *reduce* his early release credits.

Preston has the burden to show that the Board's interpretation of RCW 9.94A.730 is incorrect and he has not done that. The Court should dismiss his petition.

VI. CONCLUSION

Respondent respectfully requests that this Court deny Preston's personal restraint petition with prejudice.

RESPECTFULLY SUBMITTED this 17th day of April, 2015.

ROBERT W. FERGUSON
Attorney General

s/ Ronda D. Larson
RONDA D.LARSON, WSBA#31833
Assistant Attorney General
Corrections Division OID #91025
PO Box 40116
Olympia WA 98504-0116
(360) 586-1445

CERTIFICATE OF SERVICE

I certify that on the date below I caused to be electronically filed the foregoing document with the Clerk of the Court using the electronic filing system and I hereby certify that I have mailed by United States Postal Service the document to the following non electronic filing participant:

JEFFREY E. ELLIS
LAW OFFICE OF ALSEPT & ELLIS
621 SW MORRISON ST., STE 1025
PORTLAND, OR 97205

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

EXECUTED this 17th day of April, 2015 at Olympia, WA.

s/ Cherrie Melby
CHERRIE MELBY
Legal Assistant

DOC SEP 15 2003 COMMITMENT ISSUED PRESENTING STATEMENT & INFORMATION ATTACHED

FILED

SEP 15 10:52

COURT CLERK
KING COUNTY
SEATTLE, WA

HIV

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

STATE OF WASHINGTON,)
)
 Plaintiff,) No. 02-1-08225-1 SEA
)
 Vs.) JUDGMENT AND SENTENCE
) FELONY
 ISAAH E. PRESTON)
)
 Defendant.)

I. HEARING

I.1 The defendant, the defendant's lawyer, WALTER O PEALE, and the deputy prosecuting attorney were present at the sentencing hearing conducted today. Others present were: [REDACTED] (victim); Debbie Lee (advocate); Amanda Jarman (friend of victim); Gerald Knight, Nahide Bozkurt, and eleven other friends of the victim

II. FINDINGS

There being no reason why judgment should not be pronounced, the court finds:
2.1 CURRENT OFFENSE(S): The defendant was found guilty on 7.21.2003 by plea of:

Count No.: 1 Crime: RAPE IN THE FIRST DEGREE
RCW 9A.44.040 (1) (A) Crime Code: 00714
Date of Crime: 12/22/1998 Incident No. _____

Count No.: _____ Crime: _____
RCW _____ Crime Code: _____
Date of Crime: _____ Incident No. _____

Count No.: _____ Crime: _____
RCW _____ Crime Code: _____
Date of Crime: _____ Incident No. _____

Count No.: _____ Crime: _____
RCW _____ Crime Code: _____
Date of Crime: _____ Incident No. _____

[] Additional current offenses are attached in Appendix A

SPECIAL VERDICT or FINDING(S):

- (a) While armed with a **firearm** in count(s) I RCW 9.94A.510(3).
- (b) While armed with a **deadly weapon** other than a firearm in count(s) _____ RCW 9.94A.510(4).
- (c) With a **sexual motivation** in count(s) _____ RCW 9.94A.835.
- (d) A V.U.C.S.A. offense committed in a **protected zone** in count(s) _____ RCW 69.50.435.
- (e) **Vehicular homicide** Violent traffic offense DUI Reckless Disregard.
- (f) **Vehicular homicide** by DUI with _____ prior conviction(s) for offense(s) defined in RCW 41.61.5055, RCW 9.94A.510(7).
- (g) **Non-parental kidnapping** or unlawful imprisonment with a minor victim. RCW 9A.44.130.
- (h) **Domestic violence** offense as defined in RCW 10.99.020 for count(s) _____.
- (i) Current offenses **encompassing the same criminal conduct** in this cause are count(s) _____ RCW 9.94A.589(1)(a).

2.2 **OTHER CURRENT CONVICTION(S):** Other current convictions listed under different cause numbers used in calculating the offender score are (list offense and cause number): _____

2.3 **CRIMINAL HISTORY:** Prior convictions constituting criminal history for purposes of calculating the offender score are (RCW 9.94A.525):

Criminal history is attached in **Appendix B**.

One point added for offense(s) committed while under community placement for count(s) _____

2.4 SENTENCING DATA:

Sentencing Data	Offender Score	Seriousness Level	Standard Range	Enhancement	Total Standard Range	Maximum Term
Count I	12	XII	240 TO 318 MONTHS	PLUS 60 MONTHS	300 TO 378 MONTHS	LIFE AND OR \$50,000
Count						
Count						
Count						

Additional current offense sentencing data is attached in **Appendix C**.

2.5 **EXCEPTIONAL SENTENCE (RCW 9.94A.535):**

Substantial and compelling reasons exist which justify a sentence above/below the standard range for Count(s) _____. Findings of Fact and Conclusions of Law are attached in **Appendix D**. The State did did not recommend a similar sentence.

III. JUDGMENT

IT IS ADJUDGED that defendant is guilty of the current offenses set forth in Section 2.1 above and **Appendix A**.

The Court **DISMISSES** Count(s) _____.

IV. ORDER

IT IS ORDERED that the defendant serve the determinate sentence and abide by the other terms set forth below.

4.1 RESTITUTION AND VICTIM ASSESSMENT:

- Defendant shall pay restitution to the Clerk of this Court as set forth in attached Appendix E.
- Defendant shall not pay restitution because the Court finds that extraordinary circumstances exist, and the court, pursuant to RCW 9.94A.753(2), sets forth those circumstances in attached Appendix E.
- Restitution to be determined at future restitution hearing on (Date) _____ at _____ m.
- Date to be set.
- Defendant waives presence at future restitution hearing(s).
- Restitution is not ordered.

* Defendant shall pay Victim Penalty Assessment pursuant to RCW 7.68.035 in the amount of \$500.

4.2 OTHER FINANCIAL OBLIGATIONS: Having considered the defendant's present and likely future financial resources, the Court concludes that the defendant has the present or likely future ability to pay the financial obligations imposed. The Court waives financial obligation(s) that are checked below because the defendant lacks the present and future ability to pay them. Defendant shall pay the following to the Clerk of this Court:

- (a) \$ _____, Court costs; Court costs are waived; (RCW 9.94A.030, 10.01.160)
- (b) \$100 DNA collection fee; DNA fee waived (RCW 43.43.754)(crimes committed after 7/1/02);
- (c) \$ _____, Recoupment for attorney's fees to King County Public Defense Programs; Recoupment is waived (RCW 9.94A.030);
- (d) \$ 0, Fine; \$1,000, Fine for VUCSA; \$2,000, Fine for subsequent VUCSA; VUCSA fine waived (RCW 69.50.430);
- (e) \$ 0, King County Interlocal Drug Fund; Drug Fund payment is waived; (RCW 9.94A.030)
- (f) \$ 0, State Crime Laboratory Fee; Laboratory fee waived (RCW 43.43.690);
- (g) \$ 0, Incarceration costs; Incarceration costs waived (RCW 9.94A.760(2));
- (h) \$ 0, Other costs for: _____

4.3 PAYMENT SCHEDULE: Defendant's TOTAL FINANCIAL OBLIGATION is: \$ 500.00. The payments shall be made to the King County Superior Court Clerk according to the rules of the Clerk and the following terms: Not less than \$ _____ per month; On a schedule established by the defendant's Community Corrections Officer. Financial obligations shall bear interest pursuant to RCW 10.82.090. The Defendant shall remain under the Court's jurisdiction and the supervision of the Department of Corrections for up to ten years from the date of sentence or release from confinement to assure payment of financial obligations.

- Court Clerk's trust fees are waived.
- Interest is waived except with respect to restitution.

+ restitution, if any.

4.4 **CONFINEMENT OVER ONE YEAR:** Defendant is sentenced to a term of total confinement in the custody of the **Department of Corrections** as follows, commencing: immediately; (Date): _____ by _____m.

318 months/~~days~~ on count I : _____ months days on count _____; _____ months/day on count _____
_____ months days on count _____; _____ months days on count _____; _____ months day on count _____

The above terms for counts _____ are consecutive / concurrent.

The above terms shall run CONSECUTIVE CONCURRENT to cause No.(s) _____
01-1-00069-6 (Lewis County)

The above terms shall run CONSECUTIVE CONCURRENT to any previously imposed sentence not referred to in this order.

In addition to the above term(s) the court imposes the following mandatory terms of confinement for any special **WEAPON** finding(s) in section 2.1: 60 months

which term(s) shall run consecutive with each other and with all base term(s) above and terms in any other cause. (Use this section only for crimes committed after 6-10-98)

The enhancement term(s) for any special **WEAPON** findings in section 2.1 is/are included within the term(s) imposed above. (Use this section when appropriate, but for crimes before 6-11-98 only, per In Re Charles)

The **TOTAL** of all terms imposed in this cause is 378 months.

Credit is given for ~~332~~ days served days as determined by the King County Jail ^{and juvenile} solely for ^{detention}

4.5 **NO CONTACT:** For the maximum term of life years, defendant shall have no contact with _____
[REDACTED]

4.6 **DNA TESTING.** The defendant shall have a biological sample collected for purposes of DNA identification analysis and the defendant shall fully cooperate in the testing, as ordered in **APPENDIX G.**

HIV TESTING: For sex offense, prostitution offense, drug offense associated with the use of hypodermic needles, the defendant shall submit to HIV testing as ordered in **APPENDIX G.**

4.7 (a) **COMMUNITY PLACEMENT** pursuant to RCW 9.94A.700, for **qualifying crimes committed before 7-1-2000**, is ordered for _____ months or for the period of earned early release awarded pursuant to RCW 9.94A.728, whichever is longer. [24 months for any serious violent offense, vehicular homicide, vehicular assault, or sex offense prior to 6-6-96; 12 months for any assault 2°, assault of a child 2°, felony violation of RCW 69.50.52, any crime against person defined in RCW 9.94A.411 not otherwise described above.] **APPENDIX H** for Community Placement conditions is attached and incorporated herein.

(b) **COMMUNITY CUSTODY** pursuant to RCW 9.94.710 for any **SEX OFFENSE committed after 6-5-96 but before 7-1-2000**, is ordered for a period of 36 months or for the period of earned early release awarded under RCW 9.94A.728, whichever is longer. **APPENDIX H** for Community Custody Conditions and **APPENDIX J** for sex offender registration is attached and incorporated herein.

(c) **COMMUNITY CUSTODY** - pursuant to RCW 9.94A.715 **for qualifying crimes committed after 6-30-2000** is ordered for the following established range:

- Sex Offense, RCW 9.94A.030(38) - 36 to 48 months—when not sentenced under RCW 9.94A.712
- Serious Violent Offense, RCW 9.94A.030(37) - 24 to 48 months
- Violent Offense, RCW 9.94A.030(45) - 18 to 36 months
- Crime Against Person, RCW 9.94A.411 - 9 to 18 months
- Felony Violation of RCW 69.50.52 - 9 to 12 months

or for the entire period of earned early release awarded under RCW 9.94A.728, whichever is longer.
Sanctions and punishments for non-compliance will be imposed by the Department of Corrections pursuant to RCW 9.94A.737.

APPENDIX H for Community Custody conditions is attached and incorporated herein.

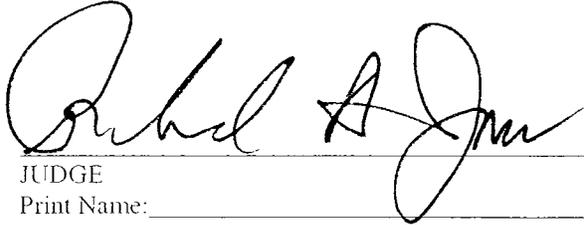
APPENDIX J for sex offender registration is attached and incorporated herein.

4.8 **WORK ETHIC CAMP:** The court finds that the defendant is eligible for work ethic camp, is likely to qualify under RCW 9.94A.690 and recommends that the defendant serve the sentence at a work ethic camp. Upon successful completion of this program, the defendant shall be released to community custody for any remaining time of total confinement. The defendant shall comply with all mandatory statutory requirements of community custody set forth in RCW 9.94A.700. **Appendix H** for Community Custody Conditions is attached and incorporated herein.

4.9 **ARMED CRIME COMPLIANCE, RCW 9.94A.475..480.** The State's plea-sentencing agreement is attached as follows:

The defendant shall report to an assigned Community Corrections Officer upon release from confinement for monitoring of the remaining terms of this sentence.

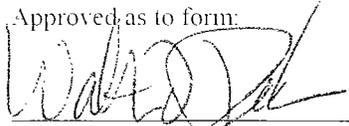
Date: Sept. 12, 2003



JUDGE
Print Name: _____

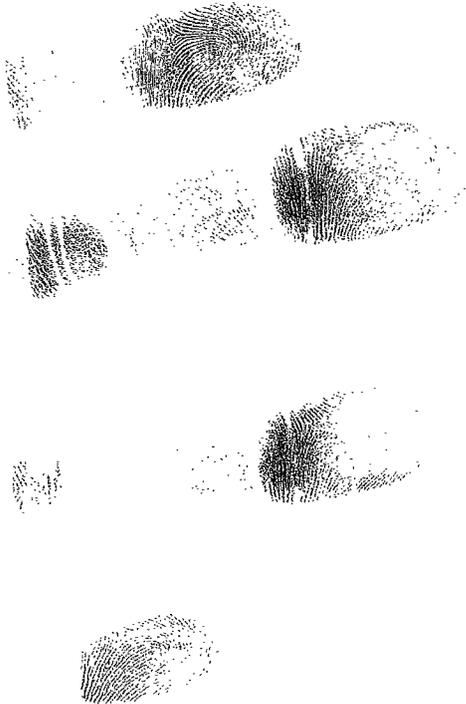
Presented by:


Deputy Prosecuting Attorney, WSBA# 28289
Print Name: Erin H. Becker

Approved as to form:


Attorney for Defendant, WSBA #
Print Name: Walker O. Pearl

FINGERPRINTS



RIGHT HAND
FINGERPRINTS OF:

DEFENDANT'S SIGNATURE: X
DEFENDANT'S ADDRESS: DOC

Isaiah E. Preston

ISAIAH E. PRESTON

DATED: SEP 12 2003

Barbara Miner

ATTESTED BY: BARBARA MINER,
SUPERIOR COURT CLERK
BY: *m. montgomery*
DEPUTY CLERK

JUDGE, KING COUNTY SUPERIOR COURT

CERTIFICATE

I, _____,
CLERK OF THIS COURT, CERTIFY THAT
THE ABOVE IS A TRUE COPY OF THE
JUDGEMENT AND SENTENCE IN THIS
ACTION ON RECORD IN MY OFFICE.
DATED: _____

OFFENDER IDENTIFICATION

S.I.D. NO.

DOB: [REDACTED]

SEX: M

RACE: B

CLERK

BY: _____
DEPUTY CLERK

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

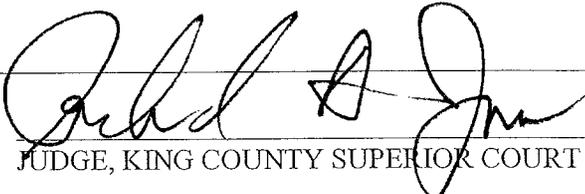
STATE OF WASHINGTON,)	
)	
	Plaintiff,	No. 02-1-08225-1 SEA
)	
vs.)	JUDGMENT AND SENTENCE,
)	(FELONY) - APPENDIX B,
ISAIAH E. PRESTON)	CRIMINAL HISTORY
)	
	Defendant,	
)	
)	

2.2 The defendant has the following criminal history used in calculating the offender score (RCW 9.94A.525):

Crime	Sentencing Date	Adult or Juv. Crime	Cause Number	Location
RAPE 2 ND DEGREE	1/4/2002	ADULT	011000696	LEWIS CO
ATT KIDNAPPING 2 ND DEGREE/W SEX MOTIVATE	6/17/1999	JUVENILE	988084873	KING CO
ATT KIDNAPPING 2 ND DEGREE/W SEX MOTIVATE	6/17/1999	JUVENILE	988084873	KING CO
ATT KIDNAPPING 2 ND DEGREE/W SEX MOTIVATE	6/16/1999	JUVENILE	988084873	KING CO
RECKLESS BURNING 2 ND DEGREE	1/4/1999	JUVENILE	988039584	KING CO
THEFT 1 ST DEGREE (NOT FIREARM)	6/17/1999	JUVENILE	988026164	KING CO

[] The following prior convictions were counted as one offense in determining the offender score (RCW 9.94A.525(5)):

Date: Sept. 12, 2003



 JUDGE, KING COUNTY SUPERIOR COURT

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

STATE OF WASHINGTON,)
)
Plaintiff,)
)
vs.)
)
ISAAH E. PRESTON)
)
Defendant,)
)
_____)

No. 02-1-08225-1 SEA
APPENDIX G
ORDER FOR BIOLOGICAL TESTING
AND COUNSELING

(1) DNA IDENTIFICATION (RCW 43.43.754):

The Court orders the defendant to cooperate with the King County Department of Adult Detention, King County Sheriff's Office, and/or the State Department of Corrections in providing a biological sample for DNA identification analysis. The defendant, if out of custody, shall promptly call the King County Jail at 296-1226 between 8:00 a.m. and 1:00 p.m., to make arrangements for the test to be conducted within 15 days.

(2) HIV TESTING AND COUNSELING (RCW 70.24.340):

(Required for defendant convicted of sexual offense, drug offense associated with the use of hypodermic needles, or prostitution related offense.)

The Court orders the defendant contact the Seattle-King County Health Department and participate in human immunodeficiency virus (HIV) testing and counseling in accordance with Chapter 70.24 RCW. The defendant, if out of custody, shall promptly call Seattle-King County Health Department at 205-7837 to make arrangements for the test to be conducted within 30 days.

If (2) is checked, two independent biological samples shall be taken.

Date: Sept. 12, 2003



JUDGE, King County Superior Court

SEP 15 2003
FAX COPY TO COUNTY JAIL

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

STATE OF WASHINGTON,)
)
Plaintiff,) No. 02-1-08225-1 SEA
)
vs.) JUDGMENT AND SENTENCE
) APPENDIX H
) COMMUNITY PLACEMENT OR
ISAAH E. PRESTON) COMMUNITY CUSTODY
)
Defendant,)

The Defendant shall comply with the following conditions of community placement or community custody pursuant to RCW 9.94A.700(4), (5):

- 1) Report to and be available for contact with the assigned community corrections officer as directed;
2) Work at Department of Corrections-approved education, employment, and/or community service;
3) Not possess or consume controlled substances except pursuant to lawfully issued prescriptions;
4) Pay supervision fees as determined by the Department of Corrections;
5) Receive prior approval for living arrangements and residence location;
6) Not own, use, or possess a firearm or ammunition. (RCW 9.94A.720(2));
7) Notify community corrections officer of any change in address or employment; and
8) Remain within geographic boundary, as set forth in writing by the Department of Corrections Officer or as set forth with SODA order.

OTHER SPECIAL CONDITIONS:

[] The defendant shall not consume any alcohol.
[X] Defendant shall have no contact with: [REDACTED]

[] Defendant shall remain [] within [] outside of a specified geographical boundary, to wit:

[X] The defendant shall participate in the following crime-related treatment or counseling services: obtain sexual deviancy evaluation (prior evaluation may suffice) and follow all treatment recommendations.

[] The defendant shall comply with the following crime-related prohibitions:

[X] Commit no criminal law violations

Other conditions may be imposed by the court or Department during community custody.

Community Placement or Community Custody shall begin upon completion of the term(s) of confinement imposed herein or when the defendant is transferred to Community Custody in lieu of earned early release. The defendant shall remain under the supervision of the Department of Corrections and follow explicitly the instructions and conditions established by that agency. The Department may require the defendant to perform affirmative acts deemed appropriate to monitor compliance with the conditions [RCW 9.94A.720] and may issue warrants and/or detain defendants who violate a condition [RCW 9.94A.740].

Date: Sept. 12, 2003

[Signature]
JUDGE

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

STATE OF WASHINGTON,)
Plaintiff,) No. 02-1-08225-1 SEA
vs.) APPENDIX J
ISAAH E. PRESTON) JUDGMENT AND SENTENCE
Defendant,) SEX OFFENDER NOTICE OF
REGISTRATION REQUIREMENTS

SEX AND KIDNAPPING OFFENDER REGISTRATION. RCW 9A.44.130, 10.01.200. Because this crime involves a sex offense or kidnapping offense (e.g., kidnapping in the first degree, kidnapping in the second degree, or unlawful imprisonment as defined in chapter 9A.40 RCW where the victim is a minor and you are not the minor's parent), you are required to register with the sheriff of the county of the state of Washington where you reside. If you are not a resident of Washington, you must register with the sheriff of the county of your school, place of employment, or vocation. You must register immediately upon being sentenced unless you are in custody, in which case you must register within 24 hours of your release.

If you leave the state following your sentencing or release from custody but later move back to Washington, you must register within 30 days after moving to this state or within 24 hours after doing so if you are under the jurisdiction of this state's Department of Corrections. If you leave this state following your sentencing or release from custody but later while not a resident of Washington you become employed in Washington, carry out a vocation in Washington, or attend school in Washington, you must register within 30 days after starting school in this state or becoming employed or carrying out a vocation in this state, or within 24 hours after doing so if you are under the jurisdiction of this state's Department of Corrections.

If you change your residence within a county, you must send written notice of your change of residence to the sheriff within 72 hours of moving. If you change your residence to a new county within this state, you must send written notice of your change of residence to the sheriff of your new county of residence at least 14 days before moving, register with the sheriff within 24 hours of moving and you must give written notice of your change of address to the sheriff of the county where last registered within 10 days of moving. If you move, work, carry on a vocation, or attend school out of Washington State, you must send written notice within 10 days of establishing residence, or after beginning to work, carry on a vocation, or attend school in th new state, to the county sheriff with whom you last registered in Washington State.

If you are a resident of Washington and you are admitted to a public or private institution of higher education, you are required to notify the sheriff of the county of your residence of your intent to attend the institution within 10 days of enrolling or by the first business day after arriving at the institution, whichever is earlier.

Even if you lack a fixed residence, you are required to register. Registration must occur within 24 hours of release in the county where you are being supervised if you do not have a residence at the time of your release from custody or within 48 hours, excluding weekends and holidays, after ceasing to have a fixed residence. If you enter a different county and stay there for more than 24 hours, you will be required to register in the new county. You must also report in person to the sheriff of the county where you registered on a weekly basis. The weekly report shall be on a day specified by the county sheriff's office, and shall occur during normal business hours. The county sheriff may require the person to list the locations where the person has stayed during the last seven days. The lack of a fixed residence is a factor that may be considered in determining an offender's risk level and shall make the offender subject to disclosure of information to the public at large pursuant to RCW 4.24.550.

I have read and understand these registration requirements.

Defendant Date
Deputy Prosecuting Attorney #20289

Judge
Defense Attorney 7887

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

State of Washington, vs. ISAIAH E PRESTON, Defendant.	Plaintiff, Defendant.	No. 02-1-08225-1 SEA FELONY WARRANT OF COMMITMENT 1. (X) DEPARTMENT OF CORRECTIONS
--	--------------------------------------	---

THE STATE OF WASHINGTON TO THE DIRECTOR OF ADULT DETENTION OF KING COUNTY

WHEREAS, Judgment has been pronounced against the defendant in the Superior Court of the State of Washington for the County of King, that the defendant be punished as specified in the Judgment and Sentence, a full true and correct copy of which is attached hereto.

(X) 1. YOU, THE DIRECTOR, ARE COMMANDED to take and deliver the defendant to the proper officers of the Department of Corrections; and

YOU, THE PROPER OFFICERS OF THE DEPARTMENT OF CORRECTIONS, ARE COMMANDED to receive the defendant for classification, confinement and placement as ordered in the Judgment and Sentence. (Sentence of confinement in Department of Corrections custody.)

YOU, THE DIRECTOR, ARE COMMANDED to take and deliver the defendant to the proper officers of the State pending delivery to the proper officers of the Department of Social and Health Services.

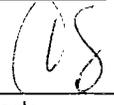
YOU, THE PROPER OFFICERS OF THE SECRETARY OF THE DEPARTMENT OF SOCIAL AND HEALTH SERVICES, ARE COMMANDED to receive the defendant for evaluation as ordered in the Judgment and Sentence.

By direction of the Honorable

Dated: September 15, 2003

ROBERT A. JONES
Judge

BARBARA MINER, Clerk

By: 
Deputy Clerk

#2
DOB: 632646
JAIL LOCATION E10LC
BAF 202039204
CCN# 177333
SID# WA19167515
DOB [REDACTED]
CHARGE RAPE I

Inmate: PRESTON, Isaiah E (832646)

Gender: Male	DOB: [REDACTED]	Age: 30	Category: Regular Inmate	Body Status: Active Inmate
RLC: MOD	Wrap-Around: No	Comm. Concern: No	Custody Level: Minimum 3 - Long Term Minimum	Location: SCCC — H5 / H5063U
ERD: 03/26/2031				CC/CCO: Aleksinski, Robert L

Offender Information (Combined)

Prison Max Expiration Date:	01/03/2034	Last Static Risk Assessment Date:	06/18/2013	DOSA:
Planned Release Date:		Last Offender Need Assessment Date:	06/18/2013	ISRB? No
Earned Release Date:	03/26/2031	RLC Override Reason:		CCB? No
ESR Sex Offender Level:				SOSSA? No
ESR Sex Offender Level Date:		Offender Release Plan:	Unknown	WEP? No
County Sex Offender Level:		Victim Witness Eligible?	Yes	
Registration Required?	Undetermined	County Of First Felony Conviction:	King	
ORCS?	No	F U L L E E R R E C O R D		
DD?	No	D O C U M E N T		
SMICNF?	No			

Sentence Structure (Field)

Cause: AA - 988084873 -

Convicted Name:	Date Of Sentence:	Cause Status:	Offense Category:
Isaiah Preston	06/17/1999	Closed	Unknown
Distinct Supervision Type:	Start Date:	Scheduled End Date:	Consecutive Supervision:
OTH	03/26/2031		

Count: 1 - RCW 9A.40.03A - Kidnapping 2

Count Start Date:	Supervision Length:	Length In Days:	Count End Date:	Stat Max:
	0Y, 0M, 0D			06/16/2009
Violent Offense?	DW / FA Enhancement?	Anticipatory:		
Yes	N	Attempt		

Count: 2 - RCW 9A.40.03A - Kidnapping 2

Count Start Date:	Supervision Length:	Length In Days:	Count End Date:	Stat Max:
	0Y, 0M, 0D			06/15/2004
Violent Offense?	DW / FA Enhancement?	Anticipatory:		
Yes	N	Attempt		

EXHIBIT 2

Cause: AB – 998008938 –

Convicted Name:	Date Of Sentence:	Cause Status:	Offense Category:
Isaiah Preston	06/17/1999	Closed	Unknown
Distinct Supervision Type:	Start Date:	Scheduled End Date:	Consecutive Supervision:
OTH	03/26/2031		

Count: 1 – RCW 9A.40.030 – Kidnapping 2

Count Start Date:	Supervision Length:	Length In Days:	Count End Date:	Stat Max:
	0Y, 0M, 0D			06/16/2009
Violent Offense?	DW / FA Enhancement?	Anticipatory:		
Yes	N	Attempt		

Cause: AC – 011000696 – Lewis

Convicted Name:	Date Of Sentence:	Cause Status:	Offense Category:
Isaiah Preston	01/04/2002	Active	Sex Crimes
Distinct Supervision Type:	Start Date:	Scheduled End Date:	Consecutive Supervision:
CCP	03/26/2031	03/25/2034	

Count: 1 – RCW 9A.44.050 – Rape 2

Count Start Date:	Supervision Length:	Length In Days:	Count End Date:	Stat Max:
03/26/2031	0Y, 36M, 0D	1,095	03/25/2034	Life
Violent Offense?	DW / FA Enhancement?	Anticipatory:		
Yes	N			

Cause: AD – 021082251 – King

Convicted Name:	Date Of Sentence:	Cause Status:	Offense Category:
Isaiah Preston	09/12/2003	Active	Sex Crimes
Distinct Supervision Type:	Start Date:	Scheduled End Date:	Consecutive Supervision:
CCI-CCM (Sex Offense)	03/26/2031	03/25/2034	

Count: 1 – RCW 9A.44.040 – Rape 1

Count Start Date:	Supervision Length:	Length In Days:	Count End Date:	Stat Max:
03/26/2031	0Y, 36M, 0D	1,095	03/25/2034	Life
Violent Offense?	DW / FA Enhancement?	Anticipatory:		
Yes	Y			

Sentence Structure (Inmate)

Cause: AA – 988084873 –

State:	Convicted Name:	Date Of Sentence:	Consecutive Cause:
Unknown	Isaiah Preston	06/17/1999	
Time Start Date:	Confinement Length:	Earned Release Date:	
06/17/1999	3Y, 1M, 24D	07/22/2001	

Count: 1 – RCW 9A.40.03A – Kidnapping 2

Anticipatory: Modifier: Enhancement: Mandatory: Confinement Length: ERT %: ERD: MaxEx: Stat Max: Violent Offense?
 Attempt 3Y, 1M, 24D 33.33% 07/22/2001 08/09/2002 06/16/2009 Yes
 Supervision Type: Supervision Length: Consecutive Count: Hold To Stat Max Expiration:
 OTH 0Y, 0M, 0D

Count: 2 – RCW 9A.40.03A – Kidnapping 2

Anticipatory: Modifier: Enhancement: Mandatory: Confinement Length: ERT %: ERD: MaxEx: Stat Max: Violent Offense?
 Attempt 3Y, 1M, 24D 33.33% 07/22/2001 08/09/2002 06/15/2004 Yes
 Supervision Type: Supervision Length: Consecutive Count: Hold To Stat Max Expiration:
 OTH 0Y, 0M, 0D

Cause: AB – 998008938 –

State: Convicted Name: Date Of Sentence: Consecutive Cause:
 Unknown Isaiah Preston 06/17/1999
 Time Start Date: Confinement Length: Earned Release Date:
 06/17/1999 3Y, 1M, 24D 07/22/2001

Count: 1 – RCW 9A.40.030 – Kidnapping 2

Anticipatory: Modifier: Enhancement: Mandatory: Confinement Length: ERT %: ERD: MaxEx: Stat Max: Violent Offense?
 Attempt 3Y, 1M, 24D 33.33% 07/22/2001 08/09/2002 06/16/2009 Yes
 Supervision Type: Supervision Length: Consecutive Count: Hold To Stat Max Expiration:
 OTH 0Y, 0M, 0D

Cause: AC – 011000696 – Lewis

State: Convicted Name: Date Of Sentence: Consecutive Cause:
 Washington Isaiah Preston 01/04/2002
 Time Start Date: Confinement Length: Earned Release Date:
 02/01/2002 0Y, 280M, 0D 04/15/2022

Count: 1 – RCW 9A.44.050 – Rape 2

Anticipatory: Modifier: Enhancement: Mandatory: Confinement Length: ERT %: ERD: MaxEx: Stat Max: Violent Offense?
 0Y, 280M, 0D 15.00% 04/15/2022 02/23/2025 Life Yes
 Supervision Type: Supervision Length: Consecutive Count: Hold To Stat Max Expiration:
 CCP 0Y, 36M, 0D

Cause: AD – 021082251 – King

State: Convicted Name: Date Of Sentence: Consecutive Cause:
 Washington Isaiah Preston 09/12/2003
 Time Start Date: Confinement Length: Earned Release Date:

09/16/2003 0Y, 378M, 0D 03/26/2031

Count: 1 – RCW 9A.44.040 – Rape 1

Anticipatory:	Modifier:	Enhancement:	Mandatory:	Confinement Length:	ERT %:	ERD:	MaxEx:	Stat Max:	Violent Offense?
		0Y, 60M, 0D	0Y, 60M, 0D	0Y, 378M, 0D	15.00%	03/26/2031	01/03/2034	Life	Yes

Supervision Type:	Supervision Length:	Consecutive Count:	Hold To Stat Max Expiration:
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CCI-CCM (Sex
Offense) 0Y, 36M, 0D

Washington State Department of Corrections

Corrections Management Information System

DOC No.: 832646 Go

Selected DOC No.: 832646 PRESTON, Isaiah E

Home Assignments Offender Facility Search Administration

Home - Offender - Sentence Information - View J & S - Prison

Logged in as Ronda Larson

Sentence Information Menu

- View J & S - Prison
- View J & S - Field
- Conditions
- Earned Time
- Good Conduct Time
- Problem J & S

Inmate: PRESTON, Isaiah E (832646)

[Legal Face Sheet](#)

Gender: Male DOB: [REDACTED] Age: 30 Category: Regular Inmate Body Status: Active Inmate
 RLC: MOD Wrap-Around: No Comm. Concern: No Custody Level: Minimum 3 - Long Term Minimum Location: SCCC - H5 / H5063U
 ERD: 03/26/2031 CC/CCO: Aleksinski, Robert L

View J & S - Prison

Period Of Jurisdiction
 06/17/1999 - Current

Display
 Include Closed Causes Enable Scrolling

Sentence Drilldown:
 Cause, Count, & Confinement Element

Details
 ERD Calculations MaxEx Calculations StatMax Calculations
 Out Time Graphical Sentence View

WEP Eligible Offender: No
 Felony Firearm Registration: No

Cause	Count	Confinement Element	Consecutive Confinement	Status	Confinement Length	Time Start Date	ERD	+ Length In Days	- Cause ERT Credits	ERT %	- Potential ET	ET Earned	+ ET Not Earned	Available ET	Potential GCT	GCT Certified	+ GCT Lost	Available GCT	+ Out Time	MaxEx	Stat Max	
Offender Overall																						
				Active	0Y, 397M, 11D	02/01/2002	03/26/2031	-	-	-	-	-	-	-	-	-	-	-	-	01/03/2034	Life	
				Active	0Y, 280M, 0D	02/01/2002	04/15/2022	8,522	99	17	15.00%	-	-	-	841	0	230	611	0	02/23/2025	Life	
				Active	0Y, 280M, 0D	02/01/2002	04/15/2022	8,522	99	17	15.00%	420.26	266.24	3.59	150.43	841	0	230	611	0	02/23/2025	Life
				-	0Y, 280M, 0D	02/01/2002	04/15/2022	8,522	99	17	15.00%	420.26	266.24	3.59	150.43	841	0	230	611	0	-	-
				Active	0Y, 378M, 0D	09/16/2003	03/26/2031	11,504	435	77	15.00%	-	-	-	777	0	230	547	0	01/03/2034	Life	
				Active	0Y, 378M, 0D	09/16/2003	03/26/2031	11,504	435	77	15.00%	388.71	57.00	0.00	331.71	777	0	230	547	0	01/03/2034	Life
				-	0Y, 60M, 0D	09/16/2003	07/07/2007	1,825	435	0	0.00%	0.00	0.00	0.00	0.00	0	0	0	0	0	-	-
				-	0Y, 60M, 0D	07/07/2007	07/05/2012	1,825	0	0	0.00%	0.00	0.00	0.00	0.00	0	0	0	0	0	-	-
				-	0Y, 258M, 0D	07/05/2012	03/26/2031	7,852	0	77	15.00%	388.71	57.00	0.00	331.71	777	0	230	547	0	-	-

Sanctions

Maintain

Create

Action

Analyze Print

EXHIBIT 3

The Law Offices of
ALSEPT & ELLIS, LLC
621 SW Morrison St., Suite 1025
Portland, OR 97205
1-888-712-3115 ✉ JeffreyErwinEllis@gmail.com

October 23, 2014

Indeterminate Sentence Review Board
4317 Sixth Avenue SE
PO Box 40907
Olympia, WA 98504-0904
Sent via email

RE: Isaiah Preston, DOC # 832646
Request for Review Hearing Pursuant to SSB 5064

Members of the Board:

Our office represents Mr. Preston. On his behalf, we would like to request a review hearing pursuant to Section 10 of 2SSB 5064.

As a result of prior correspondence, it is my understanding that the Board is requiring petitioners to serve 20 years of flat time prior to requesting a hearing, without consideration for earned release time. With all due respect, we believe this to be an erroneous application of the new legislation.

At the time of his offense, Mr. Preston was entitled to earn early release time under former RCW 9.94A.150. Retroactive reduction of earned release time violates the ex post facto clause of the federal constitution. *In re Smith*, 139 Wn.2d 199, 208, 986 P.2d 131, 135 (1999). *See also, Lynce v. Mathis*, 519 U.S. 433, 117 S. Ct. 891, 137 L. Ed. 2d 63 (1997). This is true even when a statute reducing earned release creates some new avenues for early release. *Weaver v. Graham*, 450 U.S. 24, 34-36, 101 S. Ct. 960, 967, 67 L. Ed. 2d 17 (1981).

Further, abrogating Mr. Preston's earned release time would raise issues of equal protection and due process. An offender whose behavior is abysmal would come before the Board just as soon as one whose behavior is exemplary for no articulable reason and with no due process.

There is no reason to believe that the legislature intended to create these constitutional and statutory conflicts. Nowhere does the statute state that offenders have lost their earned early release credits. Presumably, the legislature understood that the parole board, and later the ISRB, has always taken earned early release credit into account when calculating the date at which offenders are entitled to parolability hearings. *See, e.g., Matter of Powell*, 117 Wn.2d 175, 204, 814 P.2d 635, 649 (1991) (after SHB 1457 required the Board to make minimum terms commensurate with SRA guidelines, prisoners argued that this abrogated their early release credit; Supreme Court confirmed that such credit would continue to reduce their minimum terms).

I appreciate your thoughtful consideration. If you agree with our position, could you please inform me of what date you have calculated when Mr. Preston will be eligible for a release hearing. If you have any questions or would like to discuss this further with me, please do not hesitate to contact me.

Sincerely,

s/Jeffrey Ellis
Attorney for Mr. Preston

cc: Isaiah Preston



STATE OF WASHINGTON
DEPARTMENT OF CORRECTIONS
INDETERMINATE SENTENCE REVIEW BOARD
P O BOX 40907 OLYMPIA WA 98504-0907

November 3, 2014

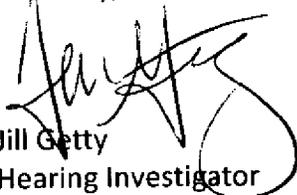
Jeffrey Ellis, Attorney at Law
Alsept & Ellis, LLC
621 SW Morrison St, Ste 1025
Portland, OR 97205

RE: PRESTON, Isaiah – DOC# 832646

Mr. Ellis:

I am in receipt of your letter dated October 23, 2014 regarding Mr. Preston's SSB 5064 eligibility date. Your concerns are noted. However, the Indeterminate Sentence Review Board's (ISRB) current interpretation is that individuals must serve 20 years "flat time" before they are eligible for early release consideration pursuant to SSB 5064. As such, Mr. Preston will be eligible to petition the ISRB for early release consideration on November 22, 2020. However, I would encourage Mr. Preston to contact his prison counselor as he is currently eligible to begin participating in additional programs to assist with preparing him for release consideration.

Sincerely,



Jill Getty
Hearing Investigator

cc: file

**COURT OF APPEALS, DIVISION II
OF THE STATE OF WASHINGTON**

In re the Personal Restraint Petition of:

ISAIAH E. PRESTON,

Petitioner.

DECLARATION OF
ANGELA PERRYMAN

I, ANGELA PERRYMAN, make the following declaration:

1. I am a Correctional Records Technician (CRT) for the Department of Corrections (DOC) at the Stafford Creek Corrections Center in Aberdeen, Washington. I have knowledge of the facts stated herein and am competent to testify.

2. The DOC maintains an inmate central file for each offender. This file contains information on an inmate's sentence structure and documents relevant to his incarceration. As a CRT, I am a custodian of records kept by DOC in the ordinary course of business.

3. When an offender is received into the custody of DOC, a certified copy of his judgment and sentence becomes an official record in his DOC central file.

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4. Upon request of the Attorney General's Office, I provided a copy of the judgment and sentence from the central file of inmate Isaiah Preston, DOC No. 832646, to be used as an exhibit.

I declare under the penalty of perjury of the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

EXECUTED this 17th day of April 2015, at Aberdeen, Washington.


ANGELA PERRYMAN

**COURT OF APPEALS, DIVISION II
OF THE STATE OF WASHINGTON**

In re the Personal Restraint Petition of:

ISAIAH E. PRESTON,

Petitioner.

DECLARATION OF
ROBIN RILEY

I, ROBIN RILEY, make the following declaration:

1. I am an Administrative Assistant 5 (AA5) for the Department of Corrections (DOC) at the Indeterminate Sentence Review Board (ISRB) office in Lacey, Washington. I have knowledge of the facts stated herein and am competent to testify.

2. The ISRB maintains an offender board file for each offender under the ISRB's jurisdiction. This file contains information on an offender's sentence structure and documents relevant to his history with the ISRB. As an AA5, I am a custodian of records kept by the ISRB in the ordinary course of business.

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3. Upon request of the Attorney General's Office, I provided a correct copy of a letter from Jill Getty to Jeff Ellis, to be used as an exhibit.

I declare under the penalty of perjury of the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

EXECUTED this 17th day of April 2015, at Lacey, Washington.


ROBIN RILEY

**COURT OF APPEALS, DIVISION II
OF THE STATE OF WASHINGTON**

In re the Personal Restraint Petition of:

ISAIAH E. PRESTON,

Petitioner.

DECLARATION OF
RONDA LARSON

I, RONDA LARSON, make the following declaration:

1. I am an assistant attorney general (AAG) for the Washington Attorney General's Office (AGO) at the Corrections Division in Olympia, Washington. I have knowledge of the facts stated herein and am competent to testify.

2. I am familiar with the Offender Management Network Information (OMNI) software used by the Department of Corrections (DOC) and am authorized by the DOC to retrieve information from OMNI. Among other things, OMNI tracks information regarding an offender's location and custody.

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3. I printed out correct copies of the OMNI Legal Face Sheet for Isaiah Preston, DOC No. 832646, to be used as an exhibit.

I declare under the penalty of perjury of the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

EXECUTED this 17th day of April 2015, at Olympia, Washington.


Ronda D. Larson
RONDA LARSON

WASHINGTON STATE ATTORNEY GENERAL

April 17, 2015 - 3:37 PM

Transmittal Letter

Document Uploaded: 7-prp2-471795-Response.pdf

Case Name: In re Personal Restrained Petition of Isaiah E. Preston

Court of Appeals Case Number: 47179-5

Is this a Personal Restraint Petition? Yes No

The document being Filed is:

Designation of Clerk's Papers Supplemental Designation of Clerk's Papers

Statement of Arrangements

Motion:

Answer/Reply to Motion:

Brief:

Statement of Additional Authorities

Cost Bill

Objection to Cost Bill

Affidavit

Letter

Copy of Verbatim Report of Proceedings - No. of Volumes:

Hearing Date(s):

Personal Restraint Petition (PRP)

Response to Personal Restraint Petition

Reply to Response to Personal Restraint Petition

Petition for Review (PRV)

Other:

Comments:

No Comments were entered.

Sender Name: Cherrie S Melby - Email: cherriek@atg.wa.gov