

No. 48633-4-II

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

STATE OF WASHINGTON,

Respondent,

v.

ROBERT BELL,

Appellant.

ON APPEAL FROM THE SUPERIOR COURT OF THE
STATE OF WASHINGTON FOR CLALLAM COUNTY

BRIEF OF APPELLANT

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A. SUMMARY OF ARGUMENT

The sentencing court ordered Mr. Bell to pay a \$2000 drug fine and other discretionary costs without conduct any inquiry into his present or future ability to pay and notwithstanding the express provisions authorizing waiver for indigence. Mr. Bell asks this court to reverse the sentencing provisions regarding costs and remand for hearing regarding his indigence and ability to pay these financial obligations.

B. ASSIGNMENTS OF ERROR

1. The sentencing court twice abused its discretion by finding, in the absence of evidence in the record or a specific inquiry, that:

The Court has considered the total amount owing, the defendant's present and future ability to pay legal financial obligations, including defendant's financial resources and the likelihood that the defendant's status will change.

CP 12, 48.

2. At the first sentencing hearing, the court abused its discretion in ordering \$2000 in fines and other discretionary costs in the absence of meaningful consideration of Mr. Bell's likely ability to pay those financial obligations. CP 54

3. At the second sentencing, the court abused its discretion by refusing to consider the statutorily authorized waiver of Mr. Bell's fines based upon his indigence and by again failing to conduct a meaningful inquiry into Mr. Bell's ability to pay these obligations. CP 16.

C. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR

1. Substantial evidence is required to sustain the sentencing court's finding regarding indigency and the ability to pay legal financial obligations. The court failed to conduct an inquiry at either of the two sentencing hearing. Did the trial court abuse its discretion by entering findings that Mr. Bell had the ability to pay in the absence of such evidence in the record?

2. The penalty for Mr. Bell's conviction must include a \$2000 by statute, but that same statute permits the court to waive the fine based on indigence. The sentencing refused to consider the potential waiver of the fine at the second hearing and failed to inquire regarding Mr. Bell's present or future ability to pay these discretionary financial obligation. Did the court abuse its discretion by failing to consider waiver and imposing discretionary obligations?

D. STATEMENT OF THE CASE

Robert Bell was charged in a three count information (Clallam County Superior Court 14-1-00**166-4**) with (1) possession of a controlled substance – methamphetamine – contrary to RCW 69.50.4013, (2) obstructing a law enforcement officer, and (3) criminal trespass in the second degree. CP 75-76; 5/22/14RP 2-10.

Mr. Bell subsequently entered into a drug court contract covering both the three counts in the **166-4** cause, as well as an additional charge of possession of methamphetamine in Clallam County Superior Court 14-1-00**281-4**. CP 69-72; 8/13/14RP 2-7.

Mr. Bell returned to court a month later after receiving third new charge of possession of methamphetamine (Clallam County Superior Court 14-1-00**365-9**). 9/24/14RP 2-6. As a result, Mr. Bell voluntarily terminated the drug court contract and entered a plea bargain to resolve all the pending charges. CP 66, 60-65; 11/19/14RP 2-10. Pursuant to the agreement, the State dismissed the **281-4** and **365-9** causes in exchange for Mr. Bell's guilty plea to an amended information under cause **166-4** charging the three separate counts of possession of methamphetamine. 11/19/14RP 2-4, 10; CP 60-65, 67-

68. The parties both recommended a residential DOSA and the court ordered an evaluation. 11/19/14RP 5-6.

On December 10, 2014, Mr. Bell was sentenced pursuant to the residential DOSA statute before the Honorable Christopher Melly. 12/10/14RP 2-10; CP 46-59. With regard to legal financial obligations (LFOs), the prosecutor requested the \$500 victim penalty assessment, \$200 court costs, \$500 attorney fees, \$100 DNA fee, and a “\$2,000 drug fine.” 12/10/14RP 3.¹ Mr. Bell and his attorney expressed their desire for drug treatment and did not address LFOs. 12/10/14RP 4-5. Judge Melly did not inquire about Mr. Bell’s present or future ability to pay, but followed the prosecutor’s recommendation, imposed the LFOs, and ordered Mr. Bell to begin paying \$40 per month 60 days after his release from treatment. 12/10/14RP 7; CP 48, 54-55.

¹ RCW 9.94A.030(31) defines LFOs:
“Legal financial obligation” means a sum of money that is ordered by a superior court of the state of Washington for legal financial obligations which may include restitution to the victim, statutorily imposed crime victims' compensation fees as assessed pursuant to RCW 7.68.035, court costs, county or interlocal drug funds, court-appointed attorneys' fees, and costs of defense, fines, and any other financial obligation that is assessed to the offender as a result of a felony conviction.

Mr. Bell then completed a 90-day inpatient treatment program at American Behavioral Health Systems (ABHS) in Chehalis, during which he appeared to do well. 2/10/15RP 2-5; 2/23/16(a.m.)RP 6. On June 9, 2015, however, a notice of violation was issued alleging Mr. Bell had relapsed and tested positive for methamphetamine. CP 42-45.

In response to the court's general inquiries, Mr. Bell indicated he was not employed, he had last worked in 2004, and he was reliant on food stamps and state healthcare. 6/9/15RP 4-5. Mr. Bell indicated he was prepared to admit the violation, but the matter was set over to address the amount of time DOC was seeking. 6/12/15RP 3-4.

Unfortunately, Mr. Bell did not return to court until February 2016. 2/16/16RP 3. At that time, he was also being held for failure to pay \$14,597 in LFOs on a 2005 cause (more than half of which was interest). 2/16/16RP 2. Mr. Bell admitted his violation of the residential DOSA, so the matter was set for formal revocation and resentencing. 2/19/16RP 2.

At resentencing, the prosecutor recommended low-end concurrent sentences on the three counts, as well as the LFOs previously ordered, "should the court find...current and future ability to pay." 2/23/16RP 2-3. Mr. Bell specifically objected to the imposition of

the “\$2,000 fine mandated by RCW 69.50.430” based upon his indigence and the lack of any nexus to his offenses. 2/23/16RP 4-5. In reply, the prosecutor reiterated the request that the court inquire about Mr. Bell’s “ability to pay.”

[W]e’re just recommending the division of the fines as previously broken up in the prior J & S. I don’t know the basis for that finding at the time that that was entered. I think the Court has [to] address whether Mr. Bell has the current and future ability to pay first over. We’re kind of talking in circles. I guess it’s a moot point if [he] doesn’t, but if he does, the State is just asking for that breakdown based on the prior J & S, the way it was broken down.

2/23/16(a.m.)RP 5-6.

Judge Melly thought he had no authority to waive the drug fines based on indigence.

With regard to the legal financial obligations issue, if this were the first time the Court were considering those issues I think that consideration of the statutes that your attorney cited to, might be appropriate. However, the Court’s already addressed these back on December 10th of 2014 and I’m not really sure there’s a basis for revisiting the numbers that were ordered in that particular judgment and sentence. I confess that I don’t know if that preceded *Blazina* or was after *Blazina*, but suffice it to say that in the December 10th, 2014, judgment and sentence, \$3300.00 was imposed and included the drug funds. So, I am going to just essentially carry those over from the 2014 judgment and sentence to this one, Mr. Bell and I will certainly study these statutes that have been cited by your attorney for the next case where we’re considering these on a first time basis.

2/23/16(a.m.)RP 7; CP 9-23.

Mr. Bell now appeals from the sentencing court's failure to consider his ongoing indigence and inability to pay the discretionary LFOs ordered. CP 6. Judge Melly agreed to stay enforcement of the drug fines and discretionary LFOs collection pending appellate review. CP 7.

E. ARGUMENT

The failure to conduct an individualized inquiry into Mr. Bell's present and future ability to pay LFOs and the court's categorical refusal to consider waiver of drug fines based on indigence requires reversal and remand for a full hearing.

1. The sentencing court was obligated to establish, on the record, that Mr. Bell had the present or future ability to pay LFOs.

The Washington Supreme Court has made it clear that the sentencing courts must "consider the defendant's current or future ability to pay ... LFOs based on the particular facts of the defendant's case." State v. Blazina, 182 Wn.2d 827, 834, 344 P.3d 680 (2015), citing RCW 10.01.160(3).² The Legislature "intended each judge to

² RCW 10.01.160(3) provides:

The court shall not order a defendant to pay costs unless the defendant is or will be able to pay them. In determining the amount and method of payment of costs, the court shall take

conduct a case-by-case analysis and arrive at an LFO order appropriate to the individual defendant's circumstances." Id. The Court therefore held that the statute requires the record to reflect that the sentencing judge made an individualized inquiry into the defendant's current and future ability to pay before the court imposes LFOs." Id. at 839.

2. The sentencing court never inquired regarding Mr. Bell's present or future ability to pay LFOs and findings to the contrary must be stricken.

The two judgments each contain the same boilerplate assertion that the sentencing court had considered the total amounts owing, Mr. Bell's financial resources, the likelihood that his circumstances would change, and his present and future ability to pay the legal financial obligations. CP 12, 48. There is nothing in the record of either sentencing hearing, however, that indicates Judge Melly or the prosecutor conducted such an inquiry. In 2014 there was no inquiry and then in 2016 Judge Melly expressly declined to conduct the inquiry. See 12/10/14RP 2-8; 2/23/16RP 7. To the extent the boilerplate provision constitutes a finding of fact it must be stricken. Sunnyside Valley Irr. Dist. v. Dickie, 149 Wn.2d 873, 879-80, 73 P.3d 369 (2003).

account of the financial resources of the defendant and the nature of the burden that payment of costs will impose.

As the noted in Blazina,

this imperative under RCW 10.01.160(3) means that the court must do more than sign a judgment and sentence with boilerplate language stating that it engaged in the required inquiry. The record must reflect that the trial court made an individualized inquiry into the defendant's current and future ability to pay. Within this inquiry, the court must also consider important factors ... such as incarceration and a defendant's other debts, including restitution, when determining a defendant's ability to pay.

Blazina, 182 Wn.2d at 838. The sentencing court in Mr. Bell's case never engaged in "an individualized inquiry into the defendant's current and future ability to pay" and the findings to the contrary must, therefore, be stricken.

3. These fines, costs or assessments are LFOs subject to RCW 10.01.160(3) and waiver based on indigence pursuant to RCW 69.50.430

Mr. Bell plead guilty to possession of methamphetamine, contrary to RCW 69.50.4013(1). CP 9, 46. That statute provides that this offense is "a class C felony punishable under chapter 9A.20 RCW." RCW 69.50.4013(2). RCW 9A.20.021 then provides the maximum sentence for a class C felony is "confinement in a state correctional institution for five years, or by a fine in an amount fixed by the court of ten thousand dollars, or by both such confinement and fine." With regard to the fine, RCW 69.50.430 separately provides that:

(1) Every adult offender convicted of a felony violation of ... RCW 69.50.4013 ... must be fined one thousand dollars in addition to any other fine or penalty imposed. Unless the court finds the adult offender to be indigent, this additional fine may not be suspended or deferred by the court.

(2) On a second or subsequent conviction for violation of any of the laws listed in subsection (1) of this section, the adult offender must be fined two thousand dollars in addition to any other fine or penalty imposed. Unless the court finds the adult offender to be indigent, this additional fine may not be suspended or deferred by the court.

The trial court's discretionary authority to waive mandatory drug fine turns on the factual finding of the defendant's indigence at the time of sentencing. State v. Mayer, 120 Wn.App. 720, 728, 86 P.3d 217 (2004).

Mr. Bell specifically requested Judge Melly exercise the discretion provided by the legislature and make a finding regarding indigency in order to waive the fine. 2/23/16(a.m.)RP 4-5. Judge Melly refused to consider the possibility of waiver based on indigence, however, despite being provided the discretion by statute and he thereby abused his discretion. State v. Grayson, 154 Wn.2d 333, 342, 111 P.3d 1183 (2005) (every defendant is entitled to have the sentencing court consider sentencing alternatives authorized by statute). The categorical refusal to consider Mr. Bell's indigence before imposing the drug fines, where that authority is provided by statute, "is effectively a failure to exercise discretion and is subject to reversal." Id.

Moreover, the statutory inquiry is required for nonmandatory discretionary LFOs. Cf. State v. Mathers, 193 Wn.App. 913, 2016 WL 2865576 (2016); State v. Clark, 191 Wn.App. 369, 373, 362 P.3d 309 (2015). The Legislature has declared that a court “shall not order a defendant to pay costs unless the defendant is or will be able to pay them” and requires trial judges to conduct inquiries concerning the defendant's financial circumstances. RCW 10.01.160(3). Mr. Bell was entitled to such a determination.

Furthermore, the prior imposition of the fines in 2014 at the time the residential DOSA was entered does not bar Judge Melly from imposing the sentence he believes is appropriate following revocation. Where Mr. Bell's DOSA sentence was revoked (CP 24), that prior sentence ceased to be a final judgment on the merits and the judge at the resentencing was no longer bound by the earlier determination. See State v. Harrison, 148 Wn.2d 550, 562, 61 P.3d 1104 (2003) (vacated sentence ceased to be final so collateral estoppel does not apply). Judge Melly retained the discretion to find Mr. Bell indigent, without a present or future ability to pay, and waive the drug fines and discretionary LFOs. The sentencing court's refusal to consider that possibility was an abuse of discretion and Mr. Bell is entitled to reversal and remand in order to have his request for waiver thoughtfully considered.

4. The record reflects that Mr. Bell is indigent and therefore he would be entitled to seek relief from these discretionary legal financial obligations.

Where the legislature has provided the sentencing courts with the authority waive fines, costs and other assessments, defendants are entitled to fair consideration of those requests. See e.g. State v. Adamy, 151 Wn.App. 583, 213 P.3d 627 (2009) (granting relief where trial court mistakenly believed it did not have authority to grant SSOSA). The legislature provided the sentencing court with the discretion to waive drug fines based on indigence and the obligation not to impose costs without determining the defendant has an ability to repay those obligations. Mr. Bell was entitled to full and fair consideration of his request.

The Supreme Court has suggested trial courts look to the comment to GR 34, which notes that the sentencing court must find a person indigent if he establishes he receives assistance from a needs-based, means-tested assistance program such as Social Security or food stamps, or his household income falls below 125% of the federal poverty guidelines. Blazina, at 838-39. Looking at these factors, Mr. Bell's indigence was apparent. See e.g. 5/22/14RP 3; 9/24/14RP 3; 6/9/15RP 4 (establish indigence for appointment of counsel). In

conjunction with the request to appoint counsel, Mr. Bell noted that he last worked in 2004, remained unemployed and relied upon food stamps. 6/9/15RP 4-5. Mr. Bell plainly met the indigence standards and was entitled to have the sentencing court exercise its discretion in deciding whether or not to impose the drug fines. See also State v. Duncan, 185 Wn.2d 430, 2016 WL 1696698 *2-3 (April 28, 2016) (trial court has a statutory obligation to make an individualized inquiry before imposing LFOs). In the absence of an individualized inquiry, this Court should reverse and remand for resentencing with proper consideration of Mr. Bell's indigence and ability to pay. Duncan, 2016 WL 1696698 at *4; see also Blazina, 182 Wn.2d at 830; State v. Marks, 185 Wn.2d 143, 368 P.3d 485 (2016); State v. Leonard, 184 Wn.2d 505, 358 P.3d 1167 (per curiam).

5. In the event Mr. Bell does not substantially prevail, this Court should decline any request to impose costs on appeal.

In light of Mr. Bell's established and continuing indigence, he requests this Court decline any requests to add the costs of appeal to his already onerous legal financial obligations. Division One of this Court recently held that it would make an individualized inquiry on direct appeal to determine whether, under its discretionary authority, the State

should be granted an award of appellate costs. State v. Sinclair, 192 Wn. App. 380, 367 P.3d 612 (2016). An individualized inquiry here yields leads inevitably to the conclusion that Mr. Bell lacks the ability to pay additional costs.

Sinclair confirms that the presumption of indigency found in RAP 15.2(f) continues unless the State can show good cause to disregard the trial court's finding. 192 Wn.App. at 393.

The State cannot demonstrate the presumption of continuing indigency is overcome. Mr. Bell is represented by a court-appointed attorney on this appeal because he is "unable by reason of poverty to pay the expenses of appellate review" and "cannot contribute anything toward the costs of appellate review." He was also represented by court-appointed counsel in the superior court.

It is well within this Court's authority to deny an award of costs to the State. As Sinclair notes, RCW 10.73.160(1) affords this Court discretion over the award of costs. 192 Wn.App. at 385. In fact, the Supreme Court has called on our appellate courts to exercise their discretion when considering legal financial obligations under RCW 10.73.160. 192 Wn.App. at 388 (citing State v. Nolan, 141 Wn.2d 620, 628, 8 P.3d 300 (2000)). This mandate was renewed recently in State

v. Blazina, 182 Wn.2d 827, 834-35, 344 P.3d 680 (2015).: “National and local cries for reform of broken LFO systems demand that this court exercise its RAP 2.5(a) discretion and reach the merits of this case.”

The devastating consequences of imposing appellate costs on indigent appellants are the same as those that attend legal financial obligations imposed by the trial court:

- “LFOs accrue interest at a rate of 12 percent and may also accumulate collection fees when they are not paid on time”;
- those that cannot afford to pay end up owing more “than their wealthier counterparts” because interest accumulates and increases the total amount owing;
- courts retain jurisdiction over impoverished defendants/ appellants long after they are released from prison because jurisdiction is retained until all financial obligations are satisfied;
- a “court’s long-term involvement in defendants’ lives inhibits reentry: legal or background checks will show an active record in superior court for individuals who have not fully paid their LFOs.”; and
- an “active record can have serious negative consequences on employment, on housing, and on finances[,]” impact credit ratings” and make it more difficult to find secure housing.

Blazina, 182 Wn.2d at 836-37; *accord* Sinclair, 192 WWn.App. at 391

(“the imposition of costs against indigent defendants raises problems that are well documented in Blazina -e.g., ‘increased difficulty in

reentering society, the doubtful recoupment of money by the government, and inequities in administration.” (quoting Blazina, 182 Wn.2d at 835)). “All of these reentry difficulties increase the chances of recidivism.” Blazina, 182 Wn.2d at 837.

Consequently, in the event Mr. Bell does not substantially prevail, the Court should deny any request for costs on appeal in light of the trial court’s finding, the presumption of continuing indigence, and the clear record on appeal.

F. CONCLUSION

This Court should reverse the sentencing court’s order imposing the \$2,000 drug fine in the absence of a determination regarding Mr. Bell’s indigence and his ability to pay those obligations.

DATED this 29th day of July, 2016.

Respectfully submitted,

s/ David L. Donnan

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