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NO. 94950-6

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

In re Personal Restraint Petition of

KEVIN LIGHT-ROTH,

Petitioner.

SUPPLEMENTAL BRIEF OF RESPONDENT

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A. INTRODUCTION

In State v. O'Dell,¹ this Court adhered to its prior holding in State v. Ha'mim² and did not effectively overturn it. This Court has long held that a defendant's youth could be relevant to his ability to appreciate the wrongfulness of his conduct or conform his conduct to the law. Youth is not, however, a per se mitigating factor because youth alone is not mitigating. Youth can only support an exceptional sentence below the standard range when youthful attributes are manifested in the facts of the crime and indicate diminished culpability.

There has been no significant change in the law that would entitle Light-Roth to relief in this untimely collateral attack. Moreover, where Light-Roth did not seek an exceptional sentence he cannot show that any change in the law was material. Likewise, the trial court's imposition of a standard range sentence cannot be a fundamental defect that inherently results in a complete miscarriage of justice where Light-Roth did not ask the court to depart from the standard range, and the court showed no indication that it desired to impose a lower sentence.

¹ 183 Wn.2d 680, 358 P.3d 359 (2015).

² 132 Wn.2d 834, 940 P.2d 633 (1997).

B. ISSUES PRESENTED FOR REVIEW

1. Whether State v. O'Dell is a significant change in the law where it explicitly did not overturn State v. Ha'mim and instead reaffirmed that youth is not a per se mitigating circumstance, but can be relevant in determining whether a defendant's culpability was diminished.

2. Whether State v. O'Dell is material to Light-Roth's high-end standard range sentence where Light-Roth did not seek an exceptional sentence below the standard range.

3. Whether the trial court's imposition of a standard range sentence constitutes a fundamental defect that inherently results in a complete miscarriage of justice where both parties requested that the trial court impose a sentence within the standard range, where there is no indication that the trial court misunderstood its authority, and where there is no indication that the trial court wished to impose a lenient sentence.

C. STATEMENT OF THE CASE

Kevin Light-Roth was convicted by a jury of murder in the second degree with a firearm enhancement and unlawful possession of a firearm in the first degree. His convictions were affirmed on appeal and the mandate issued in 2008.

The facts of the murder are set forth in the unpublished Court of Appeals opinion affirming Light-Roth's conviction.³ Light-Roth was 19 years old. The facts reflect a cold-blooded premeditated murder, plus threats to others to lie and help Light-Roth hide evidence of the murder, an escape attempt and the subornation of perjury while awaiting trial. Light-Roth shot and killed 19-year-old Tython Bonnett. At the time, Light-Roth was sharing an apartment with Chris Highley and dealing methamphetamine. Bonnett, a friend, came to the apartment to socialize. Light-Roth was convinced that Bonnett had stolen his shotgun. He questioned Bonnett about the shotgun, but Bonnett denied stealing it. Apparently angered at Bonnett's denial, Light-Roth shot Bonnett in the chest as Bonnett sat on a couch. Bonnett screamed out in pain and yelled "oh, God, Kevin, don't kill me," before dying on the couch. Light-Roth told another friend who had witnessed the killing, "[i]f you don't want to be part of this, you can go ahead and leave. But if you say anything . . ." and he made a slicing gesture across his throat. Light-Roth directed his roommate, Highley, to dispose of the body. Highley acquiesced because he

³ State v. Light-Roth, unpublished opinion, 139 Wn. App. 1093, 2007 WL 2234613 (August 6, 2007). The opinion was attached to the Motion for Discretionary Review. App. 1-24. The following is a summary based on the Court of Appeals opinion.

was afraid Light-Roth would kill him too. In order to deflect any suspicion that would arise from Bonnett's sudden disappearance, Light-Roth told Bonnett's girlfriend that Bonnett had said he was going to New Mexico. Once in custody after Bonnett's body was found, Light-Roth used a pen to remove his leg shackles and handcuffs and unsuccessfully attempted to escape from custody. Prior to trial, fellow inmate Justin VanBrackle was identified as a defense witness at trial, but when interviewed by police he admitted that Light-Roth had asked him to lie, and in exchange for his testimony, Light-Roth would make sure the witnesses in VanBrackle's trial did not testify.

At sentencing, the State requested the maximum standard range sentence of 335 months. Appendix to Motion for Discretionary Review at 45. The State argued that the murder was committed in cold blood, that Light-Roth had coerced others with threats of violence to help him cover up the murder, and then attempted to suborn perjury. Id. The prosecutor also noted that the murder occurred just seven months after Light-Roth was released from custody for an adult robbery conviction. Id. at 47. Defense counsel asked for a "mid or low range" sentence. Id. at 50. The court imposed the highest sentence possible, 335 months, stating

“I am satisfied that Mr. Light-Roth demonstrates classic sociopathic behavior, didn’t care about anybody but himself, and I am satisfied that he is dangerous.” Id. at 57. Light-Roth will be released from prison at age 44 with credit for earned early release, and at age 47 if he does not earn early release.

D. ARGUMENT

1. O’DELL IS NOT A SIGNIFICANT CHANGE IN THE LAW AND THUS LIGHT-ROTH’S PETITION IS TIME-BARRED.

RCW 10.73.090 provides that no collateral attack on a judgment and sentence may be filed more than one year after the judgment becomes final, if it is valid on its face. RCW 10.73.090(1). RCW 10.73.100 provides an exception to the time bar where:

There has been a significant change in the law, whether substantive or procedural, which is material to the conviction, sentence, or other order entered in a criminal or civil proceeding instituted by the state or local government, and either the legislature has expressly provided that the change in the law is to be applied retroactively, or a court, in interpreting a change in the law that lacks express legislative intent regarding retroactive application, determines that sufficient reasons exist to require retroactive application of the changed legal standard.

RCW 10.73.100(6). This Court has defined the scope of this exception:

We hold that where an intervening opinion has **effectively overturned** a prior appellate decision that was originally determinative of a material issue, the intervening opinion constitutes a “significant change in the law” for purposes of exemption from procedural bars.

In re Pers. Restraint of Greening, 141 Wn.2d 687, 697, 9 P.3d 206 (2000) (emphasis added). A decision that settles a point of law without overturning precedent does not constitute a significant change in the law. State v. Miller, 185 Wn.2d 111, 114-15, 371 P.3d 528 (2016).⁴ The exception is predicated on a litigant’s duty to raise available arguments. Greening, 141 Wn.2d at 697.

Litigants are not faulted for omitted arguments that were unavailable at the time due to binding precedent. Id. Thus, for the exception to apply, the law itself must change, not practitioners’ understanding of the law. Miller, 185 Wn.2d at 116. See also In re Pers. Restraint of Flippo, 187 Wn.2d 106, 113, 385 P.3d 128 (2016). It is not enough for a petitioner to point to prior decisions that used imprecise or overbroad language, particularly when the issue is interpretation of a statute that remains unchanged. Domingo, 155 Wn.2d at 367-68. In Miller, this Court rejected the petitioner’s claim that a significant change in the law occurred

⁴ See also In re Pers. Restraint of Domingo, 155 Wn.2d 356, 368, 119 P.3d 816 (2005); In re Pers. Restraint of Turay, 150 Wn.2d 71, 83, 74 P.3d 1194 (2003).

because a new decision “debunked dicta relied on in practice for years.” 185 Wn.2d at 115. RCW 10.73.100(6) requires more. Id.

Light-Roth asserts that O’Dell constitutes a significant change in the law. But this Court explicitly adhered to its prior precedent in O’Dell. It did not effectively overturn prior precedent. Light-Roth was not legally precluded from seeking an exceptional sentence on the basis that his capacity to appreciate the wrongfulness of his conduct or his ability to conform his conduct to the law was substantially impaired by his youth.

In O’Dell, this Court explicitly reaffirmed what it had held previously in State v. Ha’mim, supra, 132 Wn.2d at 846: an exceptional sentence below the standard range may not be imposed on the basis of youth alone, but a defendant’s youth may be considered as to whether the defendant lacked the capacity to appreciate the wrongfulness of his conduct or the ability to conform his conduct to the law, pursuant to RCW 9.94A.535(1)(e). O’Dell, 183 Wn.2d at 689.

This statutory mitigating factor has existed since the enactment of the SRA, and no appellate decision barred trial courts from considering a defendant’s youth as relevant to culpability. Id. See Former RCW 9.94A.390(1)(e). Indeed, in State v. Ramos, 189

Wn. App. 431, 447, 357 P.3d 680 (2015), issued the same day as O'Dell, Division 3 of the Court of Appeals explained that “the decision in Ha'mim anticipated that age would be a relevant mitigating factor if the attributes of youth were relevant to culpability for a crime.”

In O'Dell, this Court did not effectively overturn Ha'mim.

Indeed, this Court explained its decision as follows:

. . . [W]e agree with much of the State’s interpretation of Ha'mim. That decision did not bar trial courts from considering a defendant’s youth at sentencing; it held only that the trial court may not impose an exceptional sentence automatically on the basis of youth, absent any evidence that youth in fact diminished a defendant’s culpability. But we also conclude that *the trial court in this case improperly interpreted Ha'mim* just as O'Dell does: to bar any consideration of the defendant’s youth at sentencing.

O'Dell, 183 Wn.2d at 689 (emphasis added). This Court also stated:

It remains true that age is not a per se mitigating factor automatically entitling every youthful defendant to an exceptional sentence. In this respect, we adhere to our holding in Ha'mim.

Id. at 695.

Ha'mim held, and O'Dell reaffirmed, that to justify a lesser sentence, the defendant must show that attributes of his youth significantly impaired his ability to appreciate the wrongfulness of

his conduct or conform his conduct to the law at the time of the crime. This holding is required by RCW 9.94A.340, which is captioned "Equal application," and reads, "The sentencing guidelines and prosecuting standards apply equally to the offenders in all parts of the state, without discrimination as to any element that does not relate to the crime or the previous record of the defendant." Circumstances unrelated to commission of the crime cannot serve as mitigating circumstances. For example, in State v. Freitag, 127 Wn.2d 141, 144, 896 P.2d 1254, 905 P.3d 355 (1995), this Court held that the defendant's "altruistic past" could not serve as a basis for an exceptional sentence below the standard range for vehicular assault. In State v. Fowler, 145 Wn.2d 400, 411, 38 P.3d 335 (2002), this Court held that "strong family support" could not serve as a basis for an exceptional sentence below the standard range for first degree robbery. In State v. Law, 154 Wn.2d 85, 110 P.3d 717 (2005), this Court held that the defendant's participation in a 12-step program pending sentencing could not serve as a basis for an exceptional sentence below the standard range for theft and forgery. Citing to Freitag and Fowler, this Court in Law explained that consideration of personal factors unrelated to the crime itself was part of the impetus behind the enactment of the

SRA. Id. at 102. The consideration of such personal factors “creates the very type of disproportionality the legislature intended to eradicate.” Id. This mandate, to treat offenders equally and to disregard personal factors unrelated to the facts of the crime, prohibits courts from considering age alone to be mitigating when it is unmoored to facts of the crime that indicate some diminished culpability.

State v. Law, supra, did not hold that youth is always irrelevant to mitigation. Youth was not at issue in Law, but this Court cited Ha'mim for the proposition that the defendant's age alone is a personal factor unrelated to the facts of the crime, and cannot serve as a basis for an exceptional sentence. 154 Wn.2d at 98. This holding was reiterated in O'Dell, when this Court stated, “age is not a per se mitigating factor automatically entitling every youthful defendant to an exceptional sentence.” 183 Wn.2d at 696.

Similarly, State v. Scott, 72 Wn. App. 207, 866 P.2d 1258 (1993), did not hold that youth is always irrelevant to mitigation. At issue in Scott was whether the trial court's exceptional sentence above the standard range of 900 months was clearly excessive. Scott argued that his age, 17, diminished his culpability, thus making the sentence excessive. Id. at 218. The Court of Appeals

rejected this claim *in light of the facts of the case*, stating “Scott’s conduct cannot *seriously* be blamed on his ‘lack of judgment.’” Id. at 219 (emphasis in original). Scott had committed premeditated murder, robbery and attempted rape of an elderly neighbor who suffered from dementia. Notably, the Court of Appeals’ decision in Scott predated Ha’ mim, and thus Ha’ mim was controlling precedent at the time of Light-Roth’s sentencing in 2004.

After O’Dell it remains true that age alone is not mitigating. Indeed, O’Dell himself received a standard range sentence on remand after the trial court considered his youth in light of the facts of the case. That sentence was affirmed by the Court of Appeals, and this Court denied review. State v. O’Dell, unpublished, 198 Wn. App. 1041, 2017 WL 1413281 (April 17, 2017), review denied, 189 Wn.2d 1007 (2017).

O’Dell is not a significant change in the law that would provide an exception to the time bar. However, if O’Dell is a significant change in this Court’s construction of the SRA, then this Court must determine whether it should be applied retroactively. Generally, when a statute has been construed by this Court, that construction is deemed to be what the statute has meant since enactment. In re Pers. Restraint of Colbert, 186 Wn.2d 614, 620,

380 P.3d 504 (2016). However, Ha'mim had already construed the SRA on this question.⁵ If Ha'mim held that youth cannot relate to the crime and can never be relevant to culpability, then the legislature acquiesced to that construction for 18 years. In light of this legislative acquiescence, it is unclear what authority this Court would have had to overturn its prior construction of the statute. If O'Dell significantly changed the construction of the SRA that had been adopted in Ha'mim, this Court would have to find "sufficient reasons exist to require retroactive application of the changed legal standard." RCW 10.73.100(6). There are no cases that apply this standard in this context.

2. WHERE LIGHT-ROTH ADVOCATED FOR A STANDARD RANGE SENTENCE AND WHERE THE COURT CONSIDERED HIS YOUTH AND IMPOSED THE HIGHEST SENTENCE POSSIBLE WITHIN THE STANDARD RANGE, LIGHT-ROTH CANNOT SHOW THAT O'DELL IS MATERIAL TO HIS SENTENCE OR THAT THE TRIAL COURT'S FAILURE TO SUA SPONTE CONSIDER AN EXCEPTIONAL SENTENCE WAS A FUNDAMENTAL DEFECT; HE IS NOT ENTITLED TO RELIEF.

Even if O'Dell was a significant change in the law, Light-Roth is not entitled to relief in this collateral attack. Light-Roth did not request an exceptional sentence below the standard range at

⁵ "The question presented in this case is the same question this court considered in Ha'mim." O'Dell, 183 Wn.2d at 689.

sentencing and the court showed no inclination to be lenient. Thus, the decision in O'Dell cannot be material to Light-Roth's sentence. Plus, there was no trial court error in imposing a standard range sentence, let alone a fundamental defect resulting in a complete miscarriage of justice justifying relief by personal restraint petition.

Light-Roth's claim of error—that the trial court failed to sua sponte consider an exceptional sentence below the standard range—is a statutory claim, not a constitutional one.⁶ Relief by way of a collateral attack is extraordinary, and the petitioner must meet a high standard before this Court will disturb a final judgment. In re Pers. Restraint of Coats, 173 Wn.2d 123, 132, 267 P.3d 324 (2011). When a nonconstitutional error is alleged in a collateral attack, the petitioner must show a fundamental defect that inherently resulted in a complete miscarriage of justice. Id.

⁶ Light-Roth was 19 when he committed this crime. Thus, the Eighth Amendment as applied in Miller v. Alabama, 567 U.S. 460, 132 S. Ct. 2455, 183 L. Ed. 2d 407 (2012), has no application to this case. Regarding the age of 18 as the line drawn for purposes of the constitutionality of certain punishments, the Supreme Court has explained: "Drawing the line at 18 years of age is subject, of course, to the objections always raised against categorical rules. The qualities that distinguish juveniles from adults do not disappear when an individual turns 18. By the same token, some under 18 have already attained a level of maturity some adults will never reach. For the reasons we have discussed, however, a line must be drawn. . . . The age of 18 is the point where society draws the line for many purposes between childhood and adulthood. It is, we conclude, the age at which the line for death eligibility ought to rest." Roper v. Simmons, 543 U.S. 551, 574, 125 S. Ct. 1183, 161 L. Ed. 2d 1 (2005). See also State v. Witherspoon, 180 Wn.2d 875, 329 P.3d 888 (2014). Moreover, the sentence imposed, 28 years, would not violate Miller since it is not a functional life sentence.

When the record reflects that a trial court misunderstood its statutory authority to impose a lower sentence and reflects the trial court's openness to imposing a lenient sentence, the mistake of law constitutes a fundamental defect that inherently results in a complete miscarriage of justice. In re Pers. Restraint of Mulholland, 161 Wn.2d 322, 166 P.3d 677 (2007). Light-Roth cannot make such a showing. He did not request an exceptional sentence. Light-Roth presented no evidence or argument that his capacity or culpability were diminished. There is no support in the record for a claim of diminished culpability based on youth. Nothing about his behavior can be explained as youthful impulsivity or the result of peer pressure.

Moreover, there is no showing that the trial court misunderstood the law. There is no reason to believe the trial court would have imposed an exceptional sentence below the standard range, if requested. The court was free to, and did, consider Light-Roth's age in deciding where to fix the sentence within the standard range. Nonetheless, the court imposed the highest sentence authorized based on its judgment that Light-Roth's conduct throughout indicated his extreme dangerousness.

This Court in O'Dell stated “It remains true that age is not a per se mitigating factor automatically entitling every youthful defendant to an exceptional sentence.” O'Dell, 183 Wn.2d at 695. Yet in granting Light-Roth’s petition, the Court of Appeals presumed that as a “youthful” adult offender Light-Roth was entitled to an exceptional sentence and thus it matters not whether defense counsel requested an exceptional sentence or whether the sentencing court showed any indication of wanting to show leniency. If Light-Roth is entitled to resentencing, then so is every other “youthful” adult offender. The holding that Light-Roth seeks would necessitate countless resentencing hearings at great cost to society and the court system.⁷

⁷ It is unclear who would qualify as a “youthful” adult offender. While Light-Roth was 19 years old, defendants will likely cite to language in a footnote in O'Dell suggesting that the brain is not fully mature until age 25. Some sense of the number of resentencings can be developed from state reports and legislative documents. During fiscal years 2014, 2015, and 2016, 18,951 adults were sentenced for felonies committed while they were between the ages of 18 and 24. *See* State of Washington Caseload Forecast Council, *Statistical Summary of Adult Felony Sentencing Fiscal Year 2016*, Table 20, pg. 52 (Dec. 2016); State of Washington Caseload Forecast Council, *Statistical Summary of Adult Felony Sentencing Fiscal Year 2015*, Table 20, p. 53 (Jan. 2016); State of Washington Caseload Forecast Council, *Statistical Summary of Adult Felony Sentencing Fiscal Year 2014*, Table 20, pg. 54 (Mar. 2015).

E. CONCLUSION

The Court of Appeals decision granting relief should be reversed. Light-Roth's personal restraint petition should be dismissed as untimely.

DATED this 26th day of January, 2018.

Respectfully submitted,

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