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May 16, 2016
Court of Appeals
Division I
State of Washington

Supreme Court No. 93248-4
(COA No. 73364-8-1)

THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

v.

BRIAN SCOTT,

Petitioner.

FILED

JUN 14 2016

WASHINGTON STATE
SUPREME COURT

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

PETITION FOR REVIEW

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A. IDENTITY OF PETITIONER

Brian Scott, petitioner here and appellant below, asks this Court to accept review of the Court of Appeals decision terminating review designated in Part B of this petition pursuant to RAP 13.3 and RAP 13.4.

B. COURT OF APPEALS DECISION

Brian Scott seeks review of the Court of Appeals decision dated April 18, 2016, a copy of which is attached as Appendix A.

C. ISSUES PRESENTED FOR REVIEW

Whether the Court of Appeals misapplied *Jackson v. Virginia* when it failed to address the insufficient identification of Mr. Scott as the person who conducted street level drug exchanges.

D. STATEMENT OF THE CASE

Brian Scott was convicted on February 26, 2015 of possession of a controlled substance with the intent to deliver. 2/26/15 RP 100.¹ While the evidence established a police officer witnessed a drug transaction on the street sometime before Mr. Scott's arrest, insufficient

¹ When referring to the record, counsel will refer to each volume by their date and then the page number within that volume. E.g., 2/26/15 RP 100. References to the clerk's papers will be by the designated page number. E.g., CP 10.

evidence was presented to the jury to establish Mr. Scott made the exchange.

Three officers who were part of a drug observation unit testified at his trial. Det. Wes Collier testified he was within “an arm’s length” of a person he saw hand “small white rocks” to two other people. 2/26/15 RP 18, 21. The detective also believed he saw a “transfer of money.” 2/26/15 RP 22. The detective testified he never took his eyes off the seller during the transaction. 2/26/15 RP 20.

Det. Collier also testified he had a hard time remembering one arrest from another. 2/26/15 RP 47. While recalled observing two exchanges being made prior to calling in the arrest team, he admitted he had not been able to recall the details of where he or Mr. Scott were standing while he made these observations. 2/26/15 RP 44. He also had trouble remembering many of the details of the day, from whom he was working with to whether he observed other transactions take place. 2/26/15 RP 40-45.

Det. Collier testified regarding the description he provided to the arrest team. He said he notified them the person he observed making exchanges had the following characteristics: “Light-skinned black male. Short curly hair. Dark jacket with the hood down. Blue jeans

and light sneakers.” 2/26/15 RP 17. While Det. Collier testified he had seen the Seahawks tattoo on the neck of the person who conducted the transactions, he admitted he did not relay this information to the arresting team. 2/26/15 RP 25. There was no dispute Mr. Scott had this distinguishing tattoo on his neck. 2/26/15/ RP 13.

Officer Terry Bailey arrested Mr. Scott. He did not see the transaction occur. 2/24/15 RP 40. In sharp contrast to Det. Collier, Officer Berry first saw Mr. Scott “coming out of Déjà Vu, which is in the 1500 block of First Avenue.” 2/24/15 RP 46. Shortly before Mr. Scott was arrested, Officer Bailey saw Mr. Scott “put something in between the bucket carrier,” describing the garbage where controlled substances were later recovered. 2/24/15 RP 47. The third officer also did not identify Mr. Scott as the drug seller.

Unlike the description of Mr. Scott or whether Mr. Scott was seen leaving Déjà Vu, there were no inconsistencies between the officers with regard to where Mr. Scott was arrested or where the controlled substances were found. Each officer agreed that they saw Mr. Scott dispose of a bag into a garbage can immediately prior to his arrest. *Id.* at 47, 92; 2/26/15 RP 23. A small bag of cocaine rocks were recovered from the garbage can. 2/24/15 RP 99.

Mr. Scott moved post-verdict for an arrest of judgment for insufficient evidence, a motion to dismiss under CrR 8.3 (b) and for a new trial under CrR 7.5 (a)(8). CP 31-40. The Court denied Mr. Scott's motions. 4/10/15 RP 14.

E. ARGUMENT

The Court of Appeals misapplied *Jackson v. Virginia* when it failed to address the insufficient identification of Mr. Scott as the person engaged in controlled substance transactions.

1. *The fact finder must rationally apply the constitutional standard of finding every element of the offense beyond a reasonable doubt in order for the evidence of guilt to be sufficient for conviction.*

The due process clause of the Fourteenth Amendment protects a defendant in a criminal case against conviction “except upon proof beyond a reasonable doubt of every fact necessary to constitute the crime with which he is charged.” *In re Winship*, 397 U.S. 358, 364, 90 S.Ct. 1068, 25 L.Ed.2d 368 (1970). “*Winship* presupposes as an essential of the due process guaranteed by the Fourteenth Amendment that no person shall be made to suffer the onus of a criminal conviction except upon sufficient proof—defined as evidence necessary to convince a trier of fact beyond a reasonable doubt of the existence of every element of the offense.” *Jackson v. Virginia*, 443 U.S. 307, 316, 99 S. Ct. 2781, 2787, 61 L. Ed. 2d 560 (1979).

The purpose of the sufficiency inquiry is to ensure the fact finder rationally applies the constitutional standard required by due process, which allows for conviction of a criminal offense only upon proof beyond a reasonable doubt. *State v. Rattana Keo Phuong*, 174 Wash.App. 494, 502, 299 P.3d 37 (2013). “In other words, the *Jackson* standard is designed to ensure that the defendant's due process right in the trial court was properly observed.” *State v. Berg*, 181 Wn.2d 857, 867, 337 P.3d 310, 314 (2014).

2. *The State presented insufficient evidence Mr. Scott engaged in a drug delivery.*

The evidence presented against Mr. Scott was insufficient to lead a rational fact finder to find guilt beyond a reasonable doubt. *Jackson*, 443 U.S. at 307, 318–19; U.S. Const. amend. XIV, § 1. The State did not prove beyond a reasonable doubt Mr. Scott intended to deliver a controlled substance. Instead, the State only presented evidence a drug transaction may have occurred, but not that Mr. Scott participated in the exchange.

In its recitation of the facts, the Court of Appeals did not discuss the identification of Mr. Scott as the person who was seen leaving Déjà Vu immediately prior to his arrest. This is an essential fact which should not have been ignored.

While the arresting officer stated the dealer never left his sight, Mr. Scott was arrested “coming out of the Déjà Vu” by the arresting team. 2/24/15 RP 46. No one ever testified they saw the person who engaged in the transaction go into Déjà Vu. In fact, when the observing officer was asked whether Déjà Vu had any significance to this case, he replied, “None for me.” 2/26/15 RP 57. It is not rational for Mr. Scott to be the person Det. Collier observed engaging in drug transactions when Mr. Scott was instead identified by the other witnesses as the person leaving Déjà Vu immediately prior to his arrest.

Det. Collier claimed to have never lost sight of the dealer. Mr. Scott was seen leaving Déjà Vu by the arresting team immediately before his arrest. A rational fact finder cannot find beyond a reasonable doubt the person who engaged in the drug transactions observed by Det. Collier when the arresting officer’s clear testimony place Mr. Scott other than where the transaction took place immediately prior to his arrest.

3. The evidence seized from Mr. Scott did not establish he was engaging in drug transactions.

The State failed to present sufficient evidence Mr. Scott engaged in the transactions witnessed by Det. Collier. The other evidence presented against him was insufficient to establish Mr. Scott

had the intent to commit a delivery. Intent to deliver may not be based on “bare possession of a controlled substance, absent other facts and circumstances.” *State v. Brown*, 68 Wn. App. 480, 483, 843 P.2d 1098 (1993) (*relying on State v. Johnson*, 61 Wn. App. 539, 811 P.2d 687 (1991)). Possession of a controlled substance with intent to deliver requires proof of both drug possession and some additional factor supporting an inference of intent to deliver it. *State v. Zunker*, 112 Wn. App. 130, 135–36, 48 P.3d 344 (2002) (*citing State v. Campos*, 100 Wn. App. 218, 222, 998 P.2d 893 (2000)).

The State did not prove beyond a reasonable doubt that Mr. Scott intended to deliver the controlled substances alleged to have been in his possession. *See State v. Robbins*, 68 Wn. App. 873, 876, 846 P.2d 585 (1993). He was arrested with a minimal amount of drugs, very little money and no hallmarks which would indicate he was involved in the drug trade. Mr. Scott was arrested “coming out of the Déjà Vu, which is in the 1500 block of First Avenue on the east side.” 2/24/15 RP 46. He had a twenty dollar bill in his pocket and an additional fifty eight dollars in his wallet. 2/24/15 RP 76. The cocaine found by the State was only a “baggie” which would fit into his pocket. *Id.* at 62. There were also no scales that would help weigh drugs. 2/24/15 RP 70.

The remainder of the evidence presented by the State was insufficient to sustain the State's burden. In examining this evidence, it is clear Mr. Scott did not have the intent to commit a delivery. He was arrested with a minimal amount of drugs, very little money and no hallmarks which would indicate he was involved in the drug trade.

4. Review should be granted to address the denial of Mr. Scott's due process rights.

This Court should take review to clarify the *Jackson* standard and to address the sufficiency of evidence required to establish intent to deliver a controlled substance. The testimony presented by the State does not establish Mr. Scott was the person engaged in the transactions observed by Det. Collier, an officer who had a limited ability to recall anything beyond his observation. This Court cannot have confidence in the sufficiency of this evidence when it is simply not rational for Mr. Scott to have remained in the sight of Det. Collier while he was seen exiting Déjà Vu by the arresting officers immediately prior to his arrest.

The failure to afford Mr. Scott his due process right proof beyond a reasonable doubt of every fact necessary to constitute the crime with which he is charged requires a new trial. This Court should accept review to because this issue involves a significant question of law under the United States Constitution. *Winship*, 397 U.S. at 364.

F. CONCLUSION

Based on the foregoing, petitioner Mr. Scott respectfully requests that review be granted pursuant to RAP 13.4 (b).

DATED this 16th day of May, 2016.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "T. Stearns", with a long horizontal flourish extending to the right.

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APPENDIX A

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,)	
)	DIVISION ONE
Respondent,)	
)	No. 73364-8-1
v.)	
)	UNPUBLISHED OPINION
BRIAN ALLEN SCOTT,)	
)	
Appellant.)	FILED: April 18, 2016
_____)	

DWYER, J. — Brian Scott appeals from his conviction of violation of the Uniform Controlled Substances Act—possession with the intent to deliver cocaine.¹ He contends that the State failed to present sufficient evidence of an essential element of the crime—intent to deliver—and, thus, insufficient evidence supports his conviction. Because the record contains sufficient evidence of Scott’s intent, we affirm.

I

On December 9, 2014, Detective Terry Bailey, Detective Jeffrey Sharp, and Officer Wes Collier—all of the Seattle Police Department—were conducting a “see-pop operation.” “See-pop” is a term that “refers to . . . an operation where you are just . . . conduct[ing] surveillance and watch[ing] somebody selling

¹ RCW 69.50.401(1), (2)(a).

narcotics and then arrest[ing] them." When conducting such operations, officers perform either one of two functions: engaging in observation or effectuating an arrest. The observing officers dress in plain clothes while the arresting officers dress in uniform. On this particular day, Collier was the observing officer while Bailey and Sharp were the arresting officers. Collier was utilizing a concealed earpiece that was connected to a radio, which allowed him to communicate with Bailey and Sharp.

At approximately 3:00 in the afternoon, Collier was on foot "looking for narcotics activity" in the "Pike/Pine [corridor]" in downtown Seattle. Specifically, he was "looking for any hand-to-hand transactions that could possibly be related to narcotics."

On the southwest corner of Second and Pine streets, Collier saw a man, who was later identified as Scott. Scott caught Collier's attention because Collier was "familiar with the people who [he] believe[d] [were] addicted to crack cocaine. [He] s[aw] these guys in the area almost surrounding [Scott]." Collier followed Scott and two other persons as they started walking westbound. Collier estimated that he was "probably within an arm's length of Mr. Scott and the two subjects."

From this vantage point, Collier saw Scott remove "a small plastic baggie" from his right jacket pocket. The bag contained "small white rocks, which [Collier] believed to be crack cocaine." Collier then observed Scott engage in two transactions with "[t]wo different people," which lasted "[p]robably less than five seconds." During these transactions, Collier saw Scott hand "loose rocks" to

each of the two people in exchange for money. The two people then walked eastbound while Scott and Collier walked westbound.

While following Scott, Collier gave “the arrest team information such as [Scott’s] description, direction of travel and what [Collier had] seen.” Collier described Scott as a light-skinned black male with short curly hair who was wearing a dark jacket with the hood down, blue jeans, and light sneakers. Collier noticed a distinctive Seahawks tattoo on Scott’s neck, but did not relay this information to the arrest team.

Bailey and Sharp, who were riding together in a “subdued vehicle[],”² were notified via radio of the need to effectuate Scott’s arrest. While driving to Collier’s location, Bailey and Sharp continued to receive updated information from Collier regarding Scott’s movements. By the time that Bailey and Sharp arrived at the scene, Collier and Scott had walked to the 1500 block of First Avenue.

Upon arriving at that site, Bailey saw a man matching Scott’s description. Collier stopped following Scott but continued observing, now from across the street. Bailey started following Scott, who was now walking southbound. With Scott walking ahead of him, Bailey loudly stated, “Seattle Police.” Scott continued walking southbound.

² Bailey described the vehicle:
[W]e call them subdued cars. They are patrol cars but they don’t have the black—they have a retroreflective marker on the side so it’s not easily visible and they don’t have a light bar on top. They also don’t have a cage in the back so it’s just open seating.

As Scott passed a series of trash cans at the northeast corner of First and Pike streets, Bailey observed that “[i]t looked like [Scott] put something in between the bucket carrier. The green grate that holds the trash can bucket and the trash -- and the actual trash bucket.” Bailey testified that his view of Scott was not obstructed. At trial, Bailey was asked if other people were surrounding the trash can and if it looked like other people were using the trash can. Bailey responded “no” to both questions. In addition, Collier testified that he “could see [Scott] go into his right jacket pocket . . . and then put the baggie on the rim of the metal container.”³

Following a directive from Bailey, Sharp “walked over to a trash can where [he] located some narcotics.” The contents of the bag “appeared to [Sharp] to be cocaine.”⁴ He then seized the bag, its contents included, and later took it back to the station for it to be placed into evidence.

Bailey then arrested Scott. He later performed a search. During this search, Bailey found many items in Scott’s possession including \$78, two cell phones, an electronic device, and an identification card. The white substance in the baggie was sent to a crime lab where it tested positive for cocaine. The cocaine weighed 1.1 grams.

Scott was charged with one count of violation of the Uniform Controlled Substances Act, with the intent to deliver. Following a jury trial, Scott was convicted as charged. Scott’s posttrial motion to arrest the judgment or, in the

³ The record indicates that Scott’s right front pocket is the same pocket from which Collier had seen Scott retrieve the “small white rocks” during the earlier transactions with the two people.

⁴ At trial, Sharp testified that “I think it was rock cocaine.”

alternative, to grant a new trial was denied. The trial court sentenced him to a 60-month term of imprisonment. He appeals.

II

Scott contends that insufficient evidence supports his conviction. This, he asserts, is because the State failed to present sufficient evidence that Scott had an intent to deliver the cocaine. We disagree.

The due process clause of the Fourteenth Amendment requires that the State prove every element of a crime beyond a reasonable doubt. Apprendi v. New Jersey, 530 U.S. 466, 476-77, 120 S. Ct. 2348, 147 L. Ed. 2d 435 (2000); U.S. CONST. amend. XIV. “[T]he critical inquiry on review of the sufficiency of the evidence to support a criminal conviction must be . . . to determine whether the record evidence could reasonably support a finding of guilt beyond a reasonable doubt.” Jackson v. Virginia, 443 U.S. 307, 318, 99 S. Ct. 2781, 61 L. Ed. 2d 560 (1979). “[T]he relevant question is whether, after viewing the evidence in the light most favorable to the prosecution, any rational trier of fact could have found the essential elements of the crime beyond a reasonable doubt.” Jackson, 443 U.S. at 319.

A claim of evidentiary insufficiency admits the truth of the State’s evidence and all reasonable inferences that can be drawn from that evidence. State v. Kintz, 169 Wn.2d 537, 551, 238 P.3d 470 (2010). Circumstantial evidence and direct evidence can be equally reliable. State v. Delmarter, 94 Wn.2d 634, 638, 618 P.2d 99 (1980). We defer to the jury on questions of conflicting testimony,

credibility of witnesses, and the persuasiveness of the evidence. State v. Killingsworth, 166 Wn. App. 283, 287, 269 P.3d 1064 (2012).

“[I]t is unlawful for any person to manufacture, deliver, or possess with intent to manufacture or deliver, a controlled substance.” RCW 69.50.401(1). To convict Scott of possession of a controlled substance with intent to deliver, the jury was required to find that each of the following elements of the crime was proved beyond a reasonable doubt:

- (1) That on or about [] December 9, 2014, the defendant possessed a controlled substance;
- (2) That the defendant possessed the substance with the intent to deliver a controlled substance; and
- (3) That the acts occurred in the State of Washington.

Jury Instruction 8. The jury was instructed that, “[c]ocaine is a controlled substance,” Jury Instruction 12, that “[p]ossession means having a substance in one’s custody or control,” Jury Instruction 10, and that “[d]eliver or delivery means the actual transfer of a controlled substance from one person to another.” Jury Instruction 11.

Thus, in order to convict Scott as charged, the State had to prove that he acted with the specific intent to deliver the cocaine. “Specific intent to deliver a controlled substance is a statutory element of the crime of possession with intent to deliver.” State v. Hernandez, 95 Wn. App. 480, 484, 976 P.2d 165 (1999) (citing Former RCW 69.50.401(a)(1) (1998)). “Intent is assessed objectively, rather than subjectively.” Hernandez, 95 Wn. App. at 484 (citing State v. Rodriguez, 61 Wn. App. 812, 816, 812 P.2d 868 (1991)). “A person acts with intent or intentionally when he or she acts with the objective or purpose to

accomplish a result which constitutes a crime.” RCW 9A.08.010(1)(a); State v. Atsbeha, 142 Wn.2d 904, 918, 16 P.3d 626 (2001). Specific intent cannot be presumed, but it can be inferred as a logical probability from all of the facts and circumstances. State v. Davis, 79 Wn. App. 591, 594, 904 P.2d 306 (1995).

Intent to deliver cannot be inferred from mere possession of a controlled substance. State v. Harris, 14 Wn. App. 414, 418, 542 P.2d 122 (1975).

However, intent to deliver can be inferred when all of the facts and circumstances indicate that there is possession of a controlled substance plus “at least one additional factor.” State v. Brown, 68 Wn. App. 480, 484, 843 P.2d 1098 (1993).

The State alleged that Scott had possessed the cocaine found on the trash can. Laboratory analysis established that the substance was, in fact, cocaine. Both Collier and Bailey testified to seeing Scott handle the cocaine and place it on the trash can.

The State further alleged that Scott’s intent to distribute the cocaine was proved by Collier’s testimony that he, in fact, witnessed Scott distribute cocaine. Further, that Scott was, indeed, the person observed by Collier distributing cocaine was established by: (1) Collier’s testimony that he observed Scott distribute the cocaine; (2) Collier’s testimony that he watched Scott’s movements until after Bailey began following Scott; (3) Collier’s radio-transmitted description of Scott’s appearance and clothing which led Bailey to focus on Scott; (4) the testimony of both Collier and Bailey that they each saw Scott put a baggie on the trash can (indicating that they were both watching the same person); and (5) Collier’s in-court identification of Scott as being the person he saw distribute

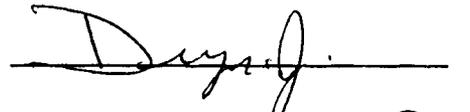
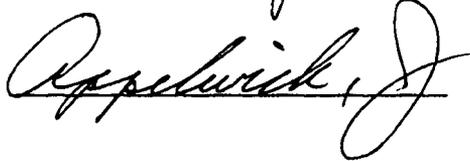
cocaine, in part based on the Seahawks tattoo. Taking this evidence in the light most favorable to the State, the Jackson test is easily met.⁵

Based on the resolution of this issue, Scott's other claim of error need not be addressed.

Affirmed.

We concur:

A handwritten signature in cursive script, appearing to read "Leach, J.", written over a horizontal line.

A handwritten signature in cursive script, appearing to read "Dwyer, J.", written over a horizontal line.
A handwritten signature in cursive script, appearing to read "Appelwick, J.", written over a horizontal line.

⁵ Scott challenges the jury's resolution of the factual issues presented at trial, asserting various inconsistencies or contradictions in the prosecution's case. This approach is not consistent with the Jackson mandate.

DECLARATION OF FILING AND MAILING OR DELIVERY

The undersigned certifies under penalty of perjury under the laws of the State of Washington that on the below date, the original document **Petition for Review to the Supreme Court** to which this declaration is affixed/attached, was filed in the **Court of Appeals** under **Case No. 73364-8-1**, and a true copy was mailed with first-class postage prepaid or otherwise caused to be delivered to the following attorney(s) or party/parties of record at their regular office or residence address as listed on ACORDS:

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Date: May 16, 2016

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