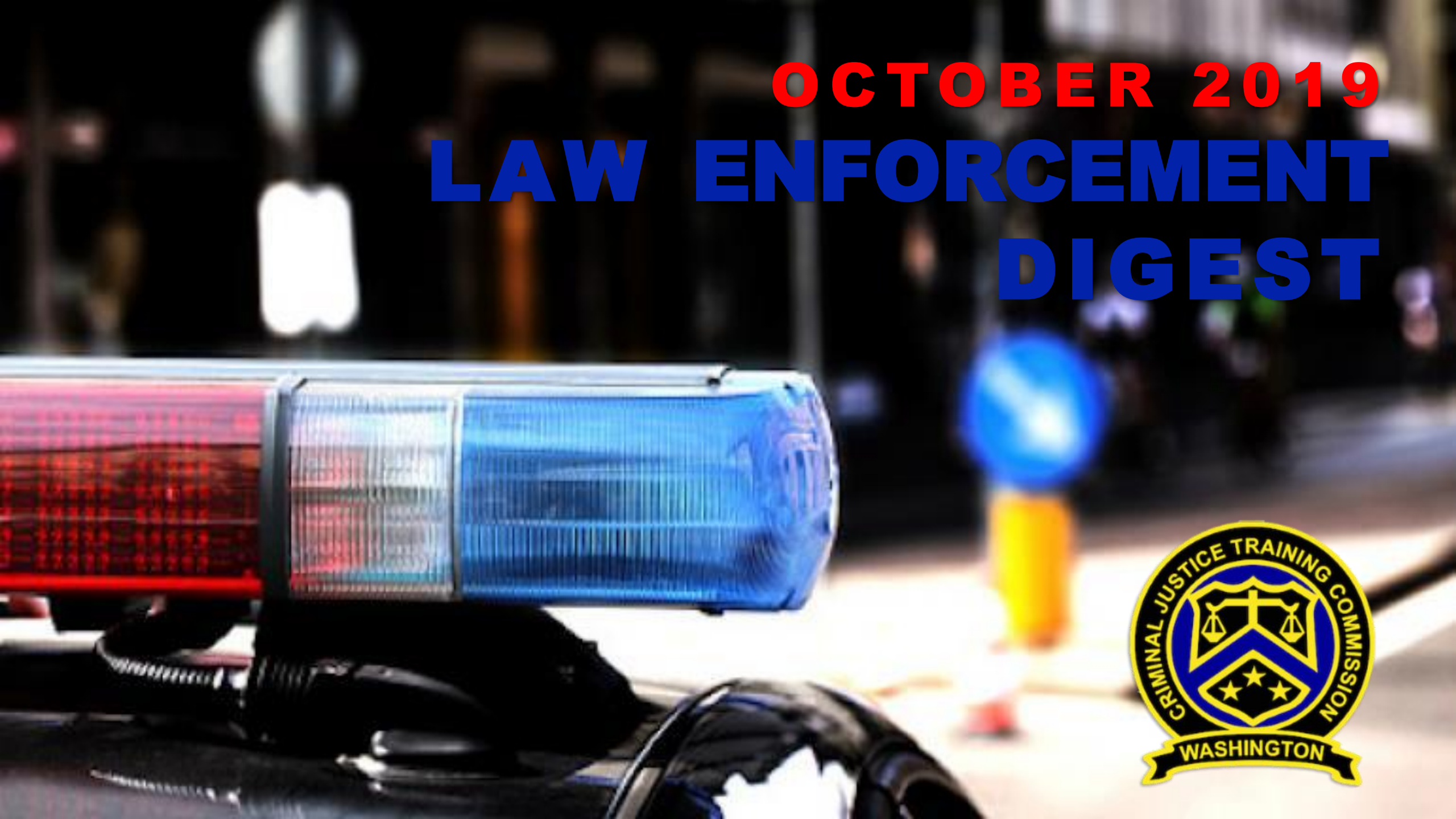


OCTOBER 2019

LAW ENFORCEMENT DIGEST

CRIMINAL JUSTICE TRAINING COMMISSION

WASHINGTON

LAW ENFORCEMENT ONLINE TRAINING DIGEST

Welcome to the October 2019 **Law Enforcement Digest Online Training**! This LED covers select court rulings issued in the month of August from the Washington State Supreme Court, the Washington Courts of Appeal, the United States Supreme Court, and the Ninth Circuit Court of Appeals. The cases are briefly summarized, with emphasis placed on how the rulings may affect Washington law enforcement officers or influence future investigations and charges.

Each cited case includes a hyperlinked title for those who wish to read the court's full opinion, as well as references to select RCWs. Links to additional Washington State prosecutor and law enforcement case law reviews and references are also included.

The materials contained in this document are for training purposes. All officers should consult their department legal advisor for guidance and policy as it relates to their particular agency.

CRIMINAL JUSTICE TRAINING COMMISSION
WASHINGTON

LAW ENFORCEMENT ONLINE TRAINING DIGEST

OCTOBER 2019 EDITION

Covering select case opinions issued in October 2019

1. **DUI; VEHICLE IMPOUNDS; INVENTORY SEARCH**
2. **SEARCH INCIDENT TO ARREST; SEARCH AND SEIZURE**
3. **SEARCH INCIDENT TO ARREST; SEARCH AND SEIZURE**
4. **DUI; PORTABLE BREATH TESTS; SEARCH INCIDENT TO ARREST**
5. **UNLAWFUL POSSESSION OF A FIREARM**
6. **STALKING; NO CONTACT ORDERS**
7. **ADDITIONAL RESOURCE LINKS: Legal Update for Law Enforcement (WASPC, John Wasberg) & Prosecutor Caselaw Update (WAPA, Pam Loginsky)**

CRIMINAL JUSTICE TRAINING COMMISSION
WASHINGTON

1 DUI; VEHICLE IMPOUNDS; INVENTORY SEARCH

State v. Villela
No. 96183-2 (Oct. 17, 2019)
Washington State Supreme Court

FACTS:

Defendant was stopped for speeding and subsequently investigated and arrested for DUI. The arresting officer impounded the defendant's Jeep pursuant to Hailey's Law, RCW 46.55.360, which requires a mandatory impound of a vehicle any time the driver is arrested for DUI. Prior to the impound, the officer performed an inventory search of the vehicle. His inventory led to the discovery of plastic baggies, digital scales, black cloth, pipes, and $340 in cash, all of which he suspected was related to drug dealing. Cocaine was discovered on the defendant's person. He was charged with DUI and Possession of a Controlled Substance with Intent to Deliver.

The defendant moved to suppress the fruits of the inventory search on the grounds that the mandatory impound authorized by RCW 46.55.360 was not a lawful seizure under Article 1, Section 7 of the WA State Constitution. The motion was granted by the trial court, and the parties agree to this immediate direct review before the Supreme Court.

1 DUI; VEHICLE IMPOUNDS; INVENTORY SEARCH

State v. Villela
No. 96183-2 (Oct. 17, 2019)
Washington State Supreme Court

Hailey's Law, passed in 2011, was named in honor of Hailey French (Huntley) who was nearly killed in 2007 when she was hit head on by a DUI repeat offender. The offender had been driven home and given her keys back by the arresting officer after her DUI arrest due to overcrowding at the jail, and in accordance with agency policy. Shortly after she was returned home, the woman took a cab back to her car, and still under the influence, crashed head first into Ms. French as she was on her way to work.

The civil lawsuit against Whatcom County, the State Patrol, and the DUI driver resulted in one of the largest civil judgments in Washington History - $5.5 million. Hailey's Law was intended to ensure that other innocent drivers would be protected from the harm she experienced, and to safeguard agencies from being liable for negligence in similar circumstances.

1 DUI; VEHICLE IMPOUNDS; INVENTORY SEARCH

State v. Villela
No. 96183-2 (Oct. 17, 2019)
Washington State Supreme Court

TRAINING TAKEAWAY: Mandatory DUI Impound Law Is Unconstitutional

Hailey's Law, RCW 46.55.360, **requiring officers to impound a vehicle whenever they arrest the driver for driving under the influence is ruled unconstitutional.**

Under Article 1, Section 7 of the WA State Constitution, a vehicle may be lawfully impounded only when there is probable cause to believe the vehicle has been stolen or used in the commission of a felony, a long-standing exception to the warrant requirement, such as community caretaking, or in the absence of probable cause, an individualized judgment by the officer that the seizure is reasonable under the circumstances and there are no reasonable alternatives to impoundment.

1 DUI; VEHICLE IMPOUNDS; INVENTORY SEARCH

State v. Villela
No. 96183-2 (Oct. 17, 2019)
Washington State Supreme Court

Reasonable alternatives must be considered and exhausted before the vehicle may be impounded.

Because RCW 46.55.360 mandated the impound of a vehicle from which a driver was arrested for DUI, the officer didn't need to and never did consider whether there were reasonable alternatives before he impounded the defendant's vehicle.

Without an individualized consideration of potential alternatives, the impound was unlawful under Article 1, Section 7 of our WA State Constitution, and the drug evidence is inadmissible fruit of the unlawful seizure.

1 DUI; VEHICLE IMPOUNDS; INVENTORY SEARCH

State v. Villela
No. 96183-2 (Oct. 17, 2019)
Washington State Supreme Court

PRACTICE POINTER: Impound is Still Allowed, but is Discretionary

The striking down of Hailey's Law as unconstitutional does NOT preclude an officer from impounding the vehicle of a DUI arrestee (or other qualifying circumstance), it just puts the decision within the discretion of the officer.

Officers will need to document their reasoning for either impounding or not impounding the vehicle of an impaired driver on a case by case basis.

Details to Consider and Document:

- Location of the car – blocking, private property, distracting?
- Safety of the car and its contents
- Identity of the Registered owner
- Potential for the driver to return to their vehicle
- Names and details of any attempts to contact a responsible driver on behalf of the defendant who may be able to move the car
- Wishes of the arrestee

It is your reasonable and well-thought-out discretion that legitimizes the impound.

1 DUI; VEHICLE IMPOUNDS; INVENTORY SEARCH

State v. Villela
No. 96183-2 (Oct. 17, 2019)
Washington State Supreme Court

PRACTICE POINTERS:

REMEMBER: Repeat DUI offenders are subject to mandatory arrest and booking under RCW 10.31.100(16).

It within your discretion to book a first-time offender to ensure they are separated from the vehicle until they're no longer a danger to themselves or others.

Agencies should work with their prosecutor's office, legal advisors, and jail to create guidelines to assist officers in making liability-smart, public safety-driven decisions on when to book a DUI arrestee and/or impound their vehicle.

2 SEARCH INCIDENT TO ARREST; SEARCH AND SEIZURE

State v. Alexander
COA No. 77513-8-I (Oct. 7, 2019)
Court of Appeals, Division I

FACTS:

An officer responding to a report of trespassing encountered a man and woman sitting in a field approximately 3 or 4 feet apart with their backs up against a log. The officer informed the pair that they were trespassing and obtained their identification. A records check revealed an active DOC warrant for the female. The male was clear.

The officer noted a pink backpack sitting directly behind the woman, appearing to the officer as if it was touching her back. She admitted that the backpack belonged to her. The officer confirmed the DOC warrant and placed the woman under arrest. At that time, he didn't believe he had probable cause for any other offense. Because she was being arrested, the male offered to take the female's backpack with him, to which she agreed. The officer informed the male that the woman's personal property would be searched incident to arrest and that it would remain with her. He asked the male to leave the scene, which he did.

2 SEARCH INCIDENT TO ARREST; SEARCH AND SEIZURE

State v. Alexander
COA No. 77513-8-I (Oct. 7, 2019)
Court of Appeals, Division I

FACTS, cont.:

The officer walked the woman and her backpack to his patrol vehicle. She was cooperative. After seating the woman in his patrol car, he placed her backpack on top of the trunk. His subsequent search of the backpack revealed what appeared to be a controlled substance. He informed the woman of what he found, indicated she was also being arrested for Possession of a Controlled Substance, and advised her of her *Miranda* rights.

The trial court denied her motion to suppress the evidence found during the warrantless search of her backpack, and the defendant now appeals her subsequent conviction for Possession of a Controlled Substance Committed While on Community Custody.

2 SEARCH INCIDENT TO ARREST; SEARCH AND SEIZURE

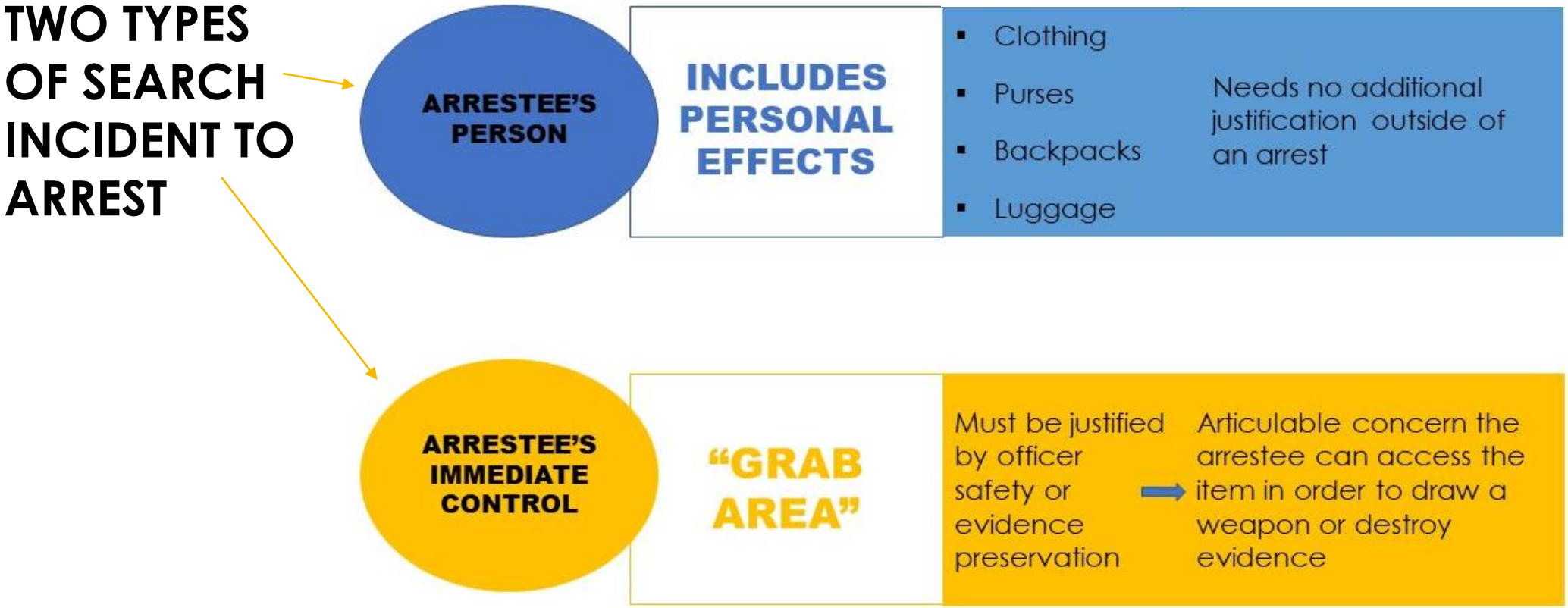
State v. Alexander
COA No. 77513-8-I (Oct. 7, 2019)
Court of Appeals, Division I

TRAINING TAKEAWAY: Search Incident to Arrest of Backpack Near Arrestee

Officers may not conduct a warrantless search of an arrestee's backpack under the search incident to arrest exception where the backpack was sitting behind her – but not held, worn, or carried by her – at the time of arrest or immediately preceding the time of arrest.

2 SEARCH INCIDENT TO ARREST; SEARCH AND SEIZURE

State v. Alexander
COA No. 77513-8-I (Oct. 7, 2019)
Court of Appeals, Division I



2 SEARCH INCIDENT TO ARREST; SEARCH AND SEIZURE

State v. Alexander
COA No. 77513-8-I (Oct. 7, 2019)
Court of Appeals, Division I

TRAINING TAKEAWAY: The Time-of-Arrest Rule

Whether an item is part of the arrestee's person is determined by applying the TIME-OF-ARREST RULE which asks did the arrestee have "actual and exclusive possession at or immediately preceding the time of arrest."

- Passenger in a car arrested for Possession of Stolen Property had a purse in her lap at the time of arrest. The officer removed the purse and set it on the ground before he removed her from the car. A search revealed methamphetamine. The trial court analyzed the issue as a "grab area" search, but the Supreme Court reversed, holding the purse was unquestionably an article "immediately associated" with her person and only leaving her hands after her arrest when the officer put it aside, and therefore was a search incident to Byrd's person. State v. Byrd (2013)
- A robbery suspect was stopped leaving a hotel while carrying a laptop bag and pushing a rolling duffle bag. Officers arrested him, and while he was standing handcuffed next to a patrol car, another officer moved the bags a car's length away and searched them. The WA Supreme Court upheld the search as a valid search of the defendant's person because the bags were in MacDicken's actual and exclusive possession at the time of his arrest. State v. MacDicken (2014)

2 SEARCH INCIDENT TO ARREST; SEARCH AND SEIZURE

State v. Alexander
COA No. 77513-8-I (Oct. 7, 2019)
Court of Appeals, Division I

TRAINING TAKEAWAY: The Time-of-Arrest Rule

- Man contacted while wearing a backpack which the officer removes while performing a *Terry* stop and frisk and then places on his passenger seat for safety. He determines the man has falsely identified himself, and instructs him to stand by the curb while the officer goes to his car to search the backpack for identification. The officer finds drugs and a DOC id card confirming the defendant provided a false identity. He arrests and handcuffs the man in his patrol car. The Supreme Court held that the lapse of time had little practical effect on Brock's relationship to his backpack. He wore it at the time he was stopped, it was only removed by the officer, and the arrest process began the moment Brock was told he wasn't free to leave.
  When an officer removes an item from the arrestee's person during a lawful *Terry* stop, and the stop ripens into a lawful arrest, the passage of time does not negate the authority of law justifying the search incident to arrest. State v. Brock (2015)

2 SEARCH INCIDENT TO ARREST; SEARCH AND SEIZURE

State v. Alexander
COA No. 77513-8-I (Oct. 7, 2019)
Court of Appeals, Division I

TRAINING TAKEAWAY: Actual and Exclusive Possession and the Time-of-Arrest Rule

Under the time-of-arrest rule, the arrestee must have actual and exclusive possession of the item to be searched, and not merely constructive possession.

The current case is distinguishable from the *Byrd/MacDicken/Brock* cases because the defendant was merely sitting in front of the backpack, so there was no evidence that she had actual and exclusive possession of it at the time of arrest or in the period immediately prior to the arrest.

- The backpack appeared to be touching the woman, but the officer hadn't seen her carrying or wearing it, and it was also within 3 or 4 feet of the male during the entire contact.

2 SEARCH INCIDENT TO ARREST; SEARCH AND SEIZURE

State v. Alexander
COA No. 77513-8-I (Oct. 7, 2019)
Court of Appeals, Division I

Warrantless searches of an arrestee's person require less justification than "grab area" searches because of the inherent safety and evidence preservation concerns associated with police taking custody of those personal items immediately associated with the arrestee, which will then necessarily travel with the arrestee to jail.

The scope of the arrestee's person is determined by what must necessarily travel with an arrestee to jail, not what an officer decides to take to jail.

- The officer could have allowed the man, whom he had no safety concerns about, to take the backpack as he left the area.
- The lack of evidence of the woman's actual and exclusive possession of the backpack, and the fact that she was in favor of the man taking it as he left, lend further support that backpack was not an item *immediately associated* with her person that would necessarily travel to jail with her. The backpack went because the officer decided it would go.

3 SEARCH INCIDENT TO ARREST; SEARCH AND SEIZURE

State v. Richards
COA No. 51700-1-II (October 29, 2019)
Court of Appeals, Division II

FACTS:

The defendant was observed by a loss prevention officer putting store merchandise into her purse and then leaving the store without paying for the items. Two waiting police officers contacted the woman outside the store, detained her, and took her back inside to the LPO office. The woman was placed under arrest for theft, and her purse was searched incident to that arrest. In the purse, the officers discovered the stolen merchandise and a closed, zippered pouch. They opened the pouch and searched it looking for theft tools used to remove secure access device tags. The pouch contained drug paraphernalia, foil residue, straws, and syringes. The defendant was charged with Unlawful Possession of Heroin and Theft. She appeals, claiming the drug evidence should have been suppressed as an unlawful search and seizure of the zippered pouch.

3 SEARCH INCIDENT TO ARREST; SEARCH AND SEIZURE

State v. Richards
COA No. 51700-1-II (October 29, 2019)
Court of Appeals, Division II

TRAINING TAKEAWAY:

Searching a closed, zippered pouch in an arrestee's purse was a proper search incident to arrest because at the time of arrest the defendant had actual and exclusive possession of the purse, and the closed pouch was not locked.

3 SEARCH INCIDENT TO ARREST; SEARCH AND SEIZURE

State v. Richards
COA No. 51700-1-II (October 29, 2019)
Court of Appeals, Division II

TRAINING TAKEAWAY:

A custodial arrest authorizes a search of the arrestee's person and any items immediately associated with her that she had actual and exclusive possession of at the time or in the immediate period prior to her arrest.

- The purse was at all times leading up to and during the arrest in the actual and exclusive possession of the defendant, and her arrest for theft authorized its search since it was an item immediately associated with her person that would necessarily accompany her to jail.

3 SEARCH INCIDENT TO ARREST; SEARCH AND SEIZURE

State v. Richards
COA No. 51700-1-II (October 29, 2019)
Court of Appeals, Division II

TRAINING TAKEAWAY:

Officers may search a closed but unlocked container found inside a backpack or purse an arrestee was carrying at the time of a custodial arrest.

- Officers may NOT conduct a warrantless search of a **locked** container inside a backpack or purse. State v. VanNess (2015)
- Digital content of a cell phone found on an arrestee's person is not subject to a warrantless search incident to arrest. Riley v. California (2014)

4 DUI; PORTABLE BREATH TESTS; SEARCH INCIDENT TO ARREST

City of Vancouver v. Kaufman
COA No. 51202-5-II (Oct. 15, 2019)
Court of Appeals, Division II

FACTS:

At 6:45am, the defendant passed an officer's marked patrol car driving 25-28 mph in a 20 mph zone. The officer turned on his "warning" lights to indicate she should slow down, which she did. The driver then moved her vehicle into a turn lane without using her turn signal for at least 100 feet before she made the turn. The officer initiated a traffic stop.

After requesting her license and registration, the officer determined the driver had an outstanding misdemeanor warrant. As he placed the driver in handcuffs, the officer noted for the first time an odor of intoxicants on the defendant. The driver was upset and crying, and the officer noticed that her eyes were a little bloodshot and her eyelids a little droopy. He decided he would begin a DUI investigation once they arrived at the jail.

4 DUI; PORTABLE BREATH TESTS; SEARCH INCIDENT TO ARREST

City of Vancouver v. Kaufman
COA No. 51202-5-II (Oct. 15, 2019)
Court of Appeals, Division II

FACTS, cont.:

At the jail, the driver refused a PBT, SFSTs, and the Datamaster breath test after the officer read her the Miranda and Implied Consent warnings. The "Pre-Arrest Observations" form noted the driver's eyes were watery and bloodshot, her speech was slow but fair, her face was flushed, her coordination was fair, she displayed mood swings, and her level of impairment was slight.

The driver was charged with DUI. Her pretrial motion to exclude evidence of her refusal to submit to the PBT and the FST was denied, and she was convicted. (She also pleaded guilty to one count of RCW 46.20.740(2), Operating a Vehicle Without Using Ignition Interlock Device as Required by Law, but this conviction is not at issue in this appeal.) She now appeals her DUI conviction.

4 DUI; PORTABLE BREATH TESTS; SEARCH INCIDENT TO ARREST

City of Vancouver v. Kaufman
COA No. 51202-5-II (Oct. 15, 2019)
Court of Appeals, Division II

TRAINING TAKEAWAY: PBT and Search Incident to A Non-DUI Arrest

A portable breath test falls within the search incident to arrest exception if it is conducted subsequent to a custodial arrest for DUI or another driving offense in which alcohol consumption is an element.

- The defendant was placed under arrest for a warrant, not a DUI. The officer testified that it wasn't until he began to handcuff her that he smelled the odor of intoxicants on her breath, and then decided he would begin a DUI investigation once they arrived at the jail.

Where the PBT does not qualify as a search incident to arrest, the driver has a constitutional right to refuse a search of her breath via a PBT, and evidence that she exercised her right to refuse cannot be introduced against her at trial.

- When the PBT was requested, it was not a valid search incident to a custodial DUI arrest, and there was no other justification for the warrantless search.

4 DUI; PORTABLE BREATH TESTS; SEARCH INCIDENT TO ARREST

City of Vancouver v. Kaufman
COA No. 51202-5-II (Oct. 15, 2019)
Court of Appeals, Division II

TRAINING TAKEAWAY: PBT and Search Incident to A Non-DUI Arrest

A PBT is not a "breath test" such as a driver is deemed to have consented to under the implied consent statute. Implied consent is satisfied only with an evidential breath test (i.e. the Dräeger).

- A PBT is governed exclusively by the WA Administrative Code (WAC 448.15.020), which explains that a PBT is voluntary, and may be used to establish that a person has consumed alcohol, probable cause to place a person under arrest for alcohol-related offenses, or probable cause to support issuance of a search warrant for blood to test for alcohol.
- The defendant had a right to refuse the voluntary, warrantless breath test, and testimony about her exercise of that right is inadmissible.

4 DUI; PORTABLE BREATH TESTS; SEARCH INCIDENT TO ARREST

City of Vancouver v. Kaufman
COA No. 51202-5-II (Oct. 15, 2019)
Court of Appeals, Division II

TRAINING TAKEAWAY: Officer's Opinion Testimony

The City conceded that it was improper opinion testimony for the officer to suggest that the defendant likely refused the PBT, SFST, and evidential breath test "because the results would show that she's under the influence," and test refusals "usually show me that someone's under the influence of alcohol."

Witnesses are generally not allowed to testify to their opinion regarding the guilt or truthfulness of the defendant because such testimony is unfairly prejudicial and invades the exclusive role of the jury in determining the ultimate issue of fact.

The court accepted the City's concession that the officer's testimony was improper, but held that the constitutional error was not harmless beyond a reasonable doubt.

- Note: Under RCW 46.61.517, the **fact** that a suspect refused an evidential breath test authorized by the implied consent statute (46.61.308(2)(b)) or a blood test requested under authority of warrant or a valid exception to the warrant requirement **is admissible** in a criminal trial.

5 UNLAWFUL POSSESSION OF A FIREARM

State v. Olsen
COA No. 51531-8-II (Oct. 8, 2019)
Court of Appeals, Division II

FACTS:

Defendant attempted to sell a 22 caliber Ruger revolver to a gun shop. The gun shop employee, an experienced firearm expert responsible for purchasing used guns on behalf of the store, thoroughly examined the firearm and offered to buy it from the defendant for $125. The defendant refused the offer, reloaded the gun, and left the store. The store employee called police to make sure the gun wasn't stolen, which alerted officers to the fact that the defendant, a convicted felon, was unlawfully in possession of a firearm. Police then contacted and arrested the defendant for 1st Degree Unlawful Possession of a Firearm, but the gun was never recovered. The defendant challenges his conviction claiming that the State failed in its burden by not proving that the firearm was operable.

5 UNLAWFUL POSSESSION OF A FIREARM

State v. Olsen
COA No. 51531-8-II (Oct. 8, 2019)
Court of Appeals, Division II

TRAINING TAKEAWAY: "Firearm" Definition and Jury Finding

Reversing its previous position, the court held that a jury is not required to find that the gun possessed by a defendant charged with Unlawful Possession of a Firearm was operable in order for it to be considered a "firearm" under former RCW 9.41.010(9) *(now RCW 9.41.010(11))*.

The plain language of RCW 9.41.010(9) defines a firearm as "a weapon or device from which a projectile or projectiles may be fired by an explosive such as gunpowder," and includes no requirement that the gun be "operational" at the time of the offense.

5 UNLAWFUL POSSESSION OF A FIREARM

State v. Olsen
COA No. 51531-8-II (Oct. 8, 2019)
Court of Appeals, Division II

The evidence supported a reasonable inference that the gun presented to the gun store employee was a "gun in fact."

- The gun store employee testified as to his extensive experience and training in the handling, assembly, firing, and purchasing of firearms.
- He unloaded the gun and subjected it to a thorough visual examination after which he concluded that it was in good working order and worthy of purchase, but was unable to perform a test fire due to limitations in the store.
- A firearms expert for the defense testified that after reviewing the video footage from the store, the police report, and statements that he believed it was a real gun rather than a toy or replica, but said that test firing was the only way to determine for sure whether the gun would fire.

6 STALKING; NO CONTACT ORDERS

State v. Nguyen
COA No. 77604-5-I (Oct. 21, 2019)
Court of Appeals, Division I

FACTS:

Victim was estranged from the defendant after ending a dating relationship that included ongoing domestic violence. She had no-contact orders protecting herself and their infant daughter. The defendant violated the orders when he committed residential burglary by kicking in the front door of the victim's house. New no-contact orders were issued when he was sentenced for that crime (November 2016).

Between December 17th and 30th of 2016, the defendant showed up at the victim's house, called her repeatedly, and sent over a hundred text messages that contained various pleas, threats to show up at her house to see his daughter, and attempts at emotional manipulation. The victim first called 911 to report the defendant showing up and demanding to be let into her house, and subsequently reported the repeated text messages and calls. Officers responding to these calls for service noted the victim was visibly distraught, jumpy, and fearful.

The defendant was convicted of two counts of DV Felony No Contact Order Violation and one count Felony Stalking. He now appeals.

6 STALKING; NO CONTACT ORDERS

State v. Nguyen
COA No. 77604-5-I (Oct. 21, 2019)
Court of Appeals, Division I

TRAINING TAKEAWAY: Stalking Charge Isn't Dependent on Speech Content

A violation of RCW 9A.46.110, Stalking, is not based on the content of pure speech.

The statute prohibits conduct, *including speech*, that seriously alarms, annoys, harasses, or is detrimental to the victim.

6 STALKING; NO CONTACT ORDERS

State v. Nguyen
COA No. 77604-5-I (Oct. 21, 2019)
Court of Appeals, Division I

RCW 9A.46.110 – STALKING

1. Stalker intentionally and repeatedly harasses or follows another person.
2. Victim is placed in fear the stalker intends to injure them, another person, or property; and a reasonable person in the same situation would also be in fear.
3. The stalker either (1) intends to frighten, intimidate, or harass; or (2) knows or reasonably should know the person is afraid, intimidated, or harassed even if the stalker didn't intend it.

6 STALKING; NO CONTACT ORDERS

State v. Nguyen
COA No. 77604-5-I (Oct. 21, 2019)
Court of Appeals, Division I

TRAINING TAKEAWAY: Stalking Conduct Prohibited

The defendant was properly convicted of stalking where there were previous incidents of domestic violence and forcibly breaking into the victim's home, and the conduct underlying the charge included repeated and unwarranted calls, visits to her home, and hundreds of text messages sent over a period of weeks, that while not explicitly violent in nature, threatened to show up to her house and attempted to emotionally manipulate and harass the victim, reasonably placing her in fear for her safety and the safety of their minor child.

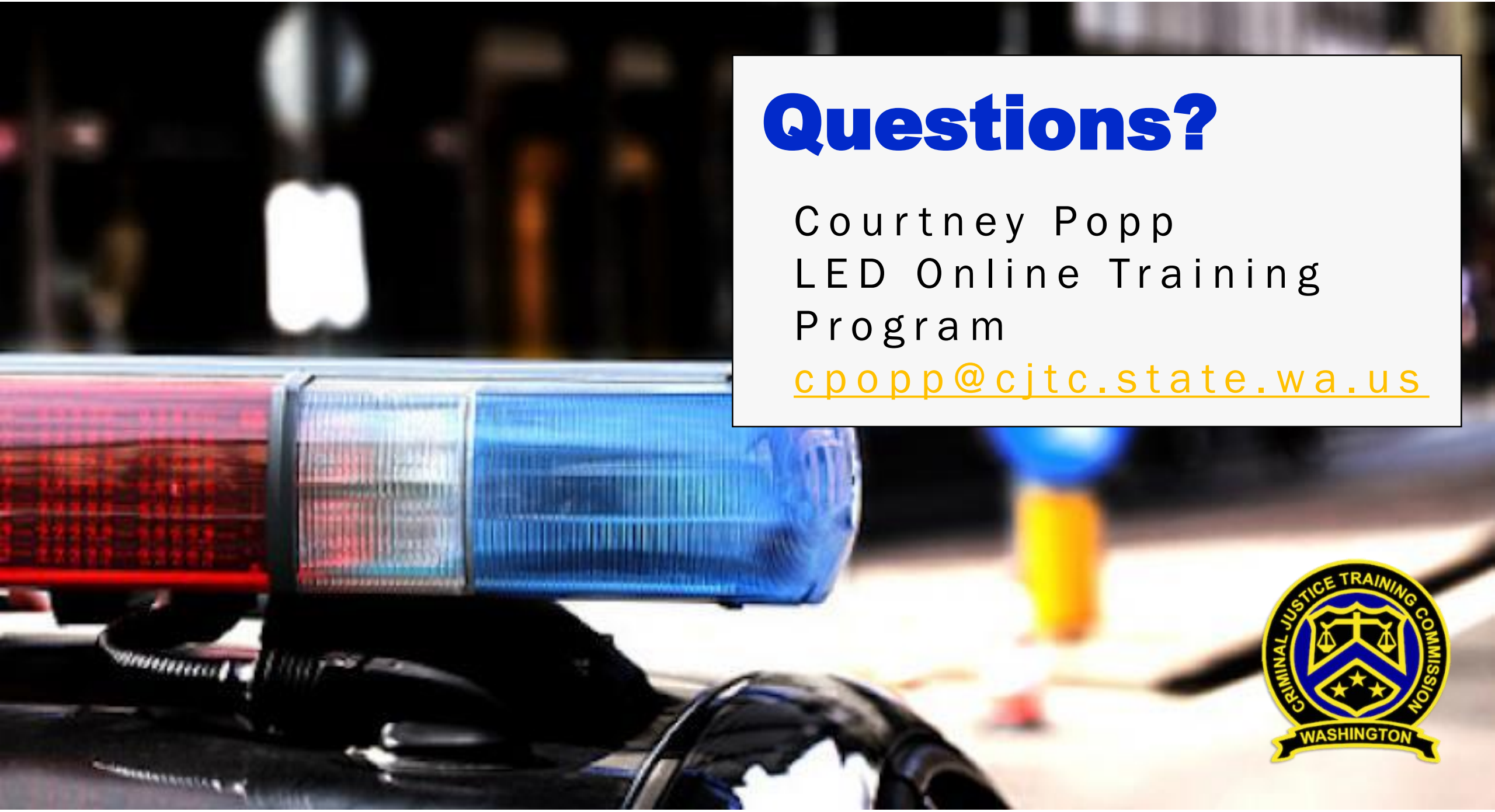
FURTHER READING

For further cases of interest to law enforcement, please see the comprehensive monthly Legal Update for Law Enforcement prepared by Attorney John Wasberg (former longtime editor of the original LED), which is published on the WASPC Law Enforcement Resources webpage:

http://www.waspc.org/legal-update-for-washington-law-enforcement

The Washington Prosecutor's Association publishes a comprehensive weekly summary of a wide range of caselaw geared toward the interests of Washington State Prosecutors. This resource is authored by WAPA Staff Attorney Pam Loginsky.

http://70.89.120.146/wapa/CaseLaw.html



Questions?

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