

JULY 2018

LAW ENFORCEMENT DIGEST



LAW ENFORCEMENT ONLINE TRAINING DIGEST



Welcome to the new **Law Enforcement Digest Online Training!** This refreshed edition of the LED continues the transition to an online training resource created with the Washington law enforcement officer in mind. Select court rulings from the previous month are summarized briefly, arranged by topic, with emphasis placed on the practical application of legal changes to law enforcement practices.

Each cited case includes a [hyperlinked title](#) for those who wish to read the court's full opinion. Links have also been provided to additional Washington State prosecutor and law enforcement case law reviews and references.

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.

LAW ENFORCEMENT ONLINE TRAINING DIGEST

JULY 2018 Edition

Covering Select Cases Issued in JUNE 2018

1. Terry Stops; Cell Phone Ping; Search Warrants
2. Attempt Crimes; Robbery
3. Cell Site Location; Search Warrants
4. Courtroom Testimony
5. Eyewitness Identification
6. Accomplice Liability; Drive-By Shooting
7. TRAINING VIDEO: RCW 46.61.655

Additional Resource Links: Legal Update for Law Enforcement (WASPC, John Wasberg) & Prosecutor Caselaw Update (WAPA, Pam Loginsky)



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TERRY STOPS; CELL PHONE PING; SEARCH WARRANTS

MURDER 1ST DEGREE; RAPE 1ST DEGREE
[*State v. Muhammad*](#), COA No. 34233-6-III (Jun. 7, 2018)
Court of Appeals, Division III

FACTS:

A couple on a walk discovered the lifeless and badly brutalized naked body of a woman in her 60s that had been discarded on the side of the road. Law enforcement's public plea for anyone who could identify the body led a man to contact officers with his suspicion that the body was that of his friend. He told officers that he ran into his friend at the grocery store the night prior to the discovery of the body. She had requested a ride, but he was on a bicycle, so he wasn't able to assist her. Officers then reviewed security footage from the surrounding businesses to put together a timeline of the woman's movements that night.

Video footage showed a distinctive car parked in the nearby McDonald's parking lot, and the victim walking in that direction until she was no longer visible, and the recording stopped. No one was seen entering or exiting the car. The video triggered recording again when the car's headlights activated, and it drove through the parking lot 7 minutes later. A nearby surveillance video captured the same car traveling by with 2 people inside.

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Court of Appeals, Division III

FACTS, cont.:

The distinctive car was then spotted driving through a nearby hotel parking lot, stopping by a secluded back entrance. Officers later located a condom wrapper in this location. The car was seen leaving that location about an hour later. The victim was not seen alive again.

Three days later, an officer spotted the distinctive car seen in the videos. He noted the license plate, and stopped the car to identify the driver and registered owner of the car. The defendant was both the RO and the driver. During the traffic stop, the officer told the defendant of a crime that occurred in the Albertson's parking lot, and a car matching his being seen there. The defendant denied having been in the lot, and told the officer that he believed he went straight home after finishing work at the Quality Inn. He asked what kind of crime, but the record does not indicate that the officer told him the nature of the crime. The officer got the defendant's cell phone number, and concluded the contact by thanking him for his time and apologizing for any inconvenience.

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Court of Appeals, Division III

FACTS, cont.:

The officer then told the rest of his department that he had located the distinctive car in the videos. His sergeant determined that the driver was a registered sex offender, and had a prior conviction in Arkansas for rape. The officer surveilled the defendant and his vehicle, although that surveillance was broken for a reason not explained in the court's opinion.

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TERRY STOPS; CELL PHONE PING; SEARCH WARRANTS

MURDER 1ST DEGREE; RAPE 1ST DEGREE
[*State v. Muhammad*](#), COA No. 34233-6-III (Jun. 7, 2018)
Court of Appeals, Division III

TRAINING TAKEAWAY #1 – *Terry* Stop, Justification:

An officer may conduct a warrantless *Terry* stop of a vehicle where the totality of the circumstances pointed to the potential involvement of the car and/or its driver in, or knowledge about, a homicide that had occurred in the area three days prior.

Totality of the Circumstances Presented in this Case:

- (1) The victim was last seen alive on a surveillance video showing her walking toward the car in the hours preceding her death.
- (2) The vehicle was distinctive
- (3) It was seen leaving the Quality Inn, the RO's place of employment, and no one else was seen entering or leaving the car.
- (4) It was parked for over 30 minutes in a lot where the victim was recorded walking towards.
- (5) The surveillance camera wasn't triggered to record again until the lights of the vehicle turned on, and the car drove away with two people inside.

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***TERRY* STOPS; CELL PHONE PING; SEARCH WARRANTS**

MURDER 1ST DEGREE; RAPE 1ST DEGREE
[*State v. Muhammad*](#), COA No. 34233-6-III (Jun. 7, 2018)
Court of Appeals, Division III

TRAINING TAKEAWAY #1 – *Terry* Stop, Justification:

***Terry* permits an officer to briefly detain, for limited questioning, a person whom he or she reasonably suspects of criminal activity, even if that criminal activity is not presently occurring.**

A *Terry* stop is a minimally invasive “intermediate response to a situation for which [an officer] lacks probable cause to arrest but which calls for further investigation.”

- The officer didn't observe criminal activity on the surveillance videos, nor when directly observing the driver prior to the stop.
- However, the totality of the circumstances of what the officer knew created a reasonable suspicion to justify the investigatory stop.

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Court of Appeals, Division III

TRAINING TAKEAWAY #2 – Terry Stop, Scope:

A Terry stop was properly where the officer limited his investigation to identifying the driver and RO of the vehicle, asking the driver whether he was present at the crime scene, and inquiring if he'd seen any suspicious activity on the night of the crime.

- The officer stopped the car with the clear purpose of identifying the driver and/or RO.
- His questions were general, and designed to elicit the driver's whereabouts and knowledge of the crime.
- The officer only provided the driver with very basic information about the crime.
- Once he had gathered the information, the officer apologized to the driver for the inconvenience, thanked him for his time, and released him.

Overall, the stop was a brief, non-accusatory intrusion into the driver's time, and an appropriate intermediate response to a situation that fell short of probable cause, but called for further investigation.

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TRAINING TAKEAWAY #3 – Warrantless Ping of Suspect’s Cell Phone:

A warrantless “ping” of the suspect’s cell phone to determine its location was justified where police feared the flight of the suspect or the destruction of evidence critical in the investigation of a violent crime, and knew their previous contact with the suspect had tipped him off to law enforcement suspecting a tie between his vehicle and a crime.

Potential for flight and destruction of evidence are not enough to support an exigent circumstances exception.

The court will look at the totality of the circumstances, including some justification for why officers couldn’t obtain a search warrant in a reasonable time now that technology permits telephonic or electronic/email search warrants to be obtained.

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TRAINING TAKEAWAY #3 – Warrantless Ping of Suspect’s Cell Phone:

The justification for an exigent circumstances exception to the warrant requirement will consider:

- (1) the gravity or violent nature of the offense with which the suspect is to be charged,
- (2) whether the suspect is reasonably believed to be armed,
- (3) whether there is reasonably trustworthy information that the suspect is guilty,
- (4) there is strong reason to believe that the suspect is on the premises,
- (5) a likelihood that the suspect will escape if not swiftly apprehended, and
- (6) the entry is made peaceably.

Not every factor has to be present, but the totality of the circumstances should clearly justify the need to act quickly.

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TRAINING TAKEAWAY #3 – Warrantless Ping of Suspect’s Cell Phone:

Here, the exigency was supported by the gravity and violent nature of the crime; trustworthy information that the suspect was guilty (surveillance video, known to victim, false statements to officer that contradicted video evidence); his proximity to the crime; a likelihood of escape (seemingly bolstered by the officer’s failed surveillance during which the suspect’s car disappeared from its last location).

Once the defendant’s vehicle was located using the location information from the ping of his cell phone, officers from Idaho and Washington approached and apprehended the suspect without violence.

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Court of Appeals, Division III

TRAINING TAKEAWAY #3 – Warrantless Ping of a Suspect’s Cell Phone:

- Note: The court specifically declined to rule on whether a warrantless cell phone ping infringes on the phone owner’s privacy rights under Art. I, Sec. 7 of the WA State Constitution.
- The location “ping” was examined solely on whether the circumstances satisfied the exigent circumstances exception to the warrant requirement.
- The exigent circumstance doesn’t need to be tied to the commission of the crime itself. Here, the exigency arose three days after the crime was committed, but only hours after the officer contacted the suspect and informed him that law enforcement knew that his vehicle had been present in the area of the crime.
- Washington courts are increasingly suspicious when law enforcement fails to secure a search warrant prior to a search. With today’s technology, the courts rarely find justification for an exigent circumstances warrantless search. It should be used only in the rarest of circumstances.

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Practice Tips:

Note Details in Reports and Testimony that Bolster Identification

- Here, the car wasn't just "distinctive," the officers made note that it was an "older, boxy, maroon American model car exhibit[ing] a discolored front driver's side rim, a chrome strip, and a light on the side between the front and rear doors." That level of detail was important in supporting the validity of the initial *Terry* stop, justifying the warrantless cell phone ping, and subsequently obtaining a warrant to search the vehicle.

Remember that a *Terry* stop is investigatory, not accusatory.

- You're conducting a brief, limited scope stop to gather information on a situation for which you don't yet have probable cause, seeking to clarify the reasonable articulable suspicion of criminal activity or a traffic violation.
- Be sure to thoroughly document the evidence that suggests a substantial possibility that criminal conduct has occurred or is about to occur.

2 ATTEMPT CRIMES; ROBBERY

ROBBERY 1ST DEGREE

[State v. Nelson](#), No. 94712-1 (June 14, 2018)

WA STATE SUPREME COURT

FACTS:

Defendant entered a Rite Aid pharmacy and demanded oxycodone from the pharmacy technician who was handling customers. He showed her a gun and demanded that she give him the drug. The victim told the defendant that she didn't have access to oxycodone and would have to ask the pharmacist to get it for him. The defendant ultimately fled the pharmacy without receiving the drugs, and was later apprehended.

At trial, the defendant claimed that the crime of Attempted Robbery required the State to prove that the victim had ownership or at least a possessory interest in the property to be stolen. The issue is now before the Supreme Court.

2 ATTEMPT CRIMES; ROBBERY

ROBBERY 1ST DEGREE

[State v. Nelson](#), No. 94712-1 (June 14, 2018)

WA STATE SUPREME COURT

TRAINING TAKEAWAY:

It is not required for the victim of a robbery to have ownership, representative interest, or possessory interest in the personal property that is taken.

- Here, it was clear that the defendant believed the pharmacy technician and pharmacist had control over the item he sought to rob – the oxycodone – which is why he was demanding it from them in his failed attempt at robbery.
- Proving that the victim was an employee of the store which had ownership of the drug was more than what was necessary to support the crime of Attempted Robbery.

Robbery is both a property crime AND a crime against a person. While the State has to establish who the victim is and what relation they have to the property to be stolen, they don't have to prove legal ownership or possessory interest.

3 CELL SITE LOCATION; SEARCH WARRANTS

ROBBERY

[*Carpenter v. United States*, No. 16-402 \(Jun. 22, 2018\)](#)

UNITED STATES SUPREME COURT

FACTS:

The petitioner was among a group of suspects being investigated by the FBI for a series of robberies. Relying on the Stored Communications Act, prosecutors sought a court order (but not a search warrant) to obtain the suspects' cell-site location information (CSLI) from their phone carriers.

Petitioner's wireless carrier produced CSLI from his phone in the form of 12,898 location points cataloging his movements over 127 days—an average of 101 data points per day. The points showed his phone was in the area of 4 of the robberies at the time they were committed. Prosecutors used this information to charge the defendant with 4 counts of Robbery.

Petitioner made a motion to suppress the cell phone data because he claimed they were seized in violation of his 4th Amendment right to privacy. The motion was denied, and the petitioner was convicted at trial. He is now appealing to the US Supreme Court to reverse the lower court's denial of his motion to suppress the evidence.

3 CELL SITE LOCATION; SEARCH WARRANTS

ROBBERY

[Carpenter v. United States](#), No. 16-402 (Jun. 22, 2018)

UNITED STATES SUPREME COURT

TRAINING TAKEAWAY:

Law enforcement should generally secure a search warrant in order to seize cell phone location data from a suspect's cell carrier.

- The Court clarified that this is a narrow ruling: it doesn't call into question prior rulings permitting:
 - Conventional surveillance techniques and tools, such as surveillance cameras, or
 - Information turned over voluntarily to a third party – ex. bank records ([US . Miller](#)) and pen register records of dialed numbers held by the phone company ([Smith v. Maryland](#))
- Existing exceptions to the search warrant requirement are still valid (ex – exigent circumstances), although they are to be used sparingly.

3 CELL SITE LOCATION; SEARCH WARRANTS

ROBBERY

[*Carpenter v. United States*, No. 16-402 \(Jun. 22, 2018\)](#)

UNITED STATES SUPREME COURT

PRACTICE TIPS:

The ruling of this case shouldn't require much of an adjustment from standard operating procedures for searching cell phone records in Washington State: the bottom line for securing evidence is almost always, **GET A WARRANT!**

- Courts at every level are increasing scrutiny of search and seizures involving our “digital lives.”
- Cell phone and other digital devices should generally be done only with a detailed and specific search warrant.

4 COURTROOM TESTIMONY

ELUDING, RECKLESS DRIVING
State v. Winborne, COA No. 35081-9-III (Jun. 26, 2018)
COURT OF APPEALS, DIV 3

FACTS:

Defendant was charged with eluding after fleeing a traffic stop. During the first incident, defendant sped through a residential area, blowing stop signs, and speeding up once the pursuing officer activated his emergency lights. The pursuit was terminated due to safety concerns.

The following day, the defendant again fled an attempted stop. He was driving at high speeds, weaving through traffic, and dangerously passing other vehicles. Officers used a Star Chase device to track the defendant, whose driving continued to include speeds over 30 miles over the speed limit, nearly striking a patrol car, and ultimately abandoning the car after more than 15 minutes of terrible driving across town.

At trial for the Eluding, the defense made a motion to prohibit any witness from describing the defendant as driving “recklessly” or “eluding” police. Multiple witnesses testified that the defendant eluded officers and/or drove recklessly. The defendant was convicted, and now appeals that issue.

4 COURTROOM TESTIMONY

ELUDING, RECKLESS DRIVING
State v. Winborne, COA No. 35081-9- III (Jun. 26, 2018)
COURT OF APPEALS, DIV 3

TRAINING TAKEAWAY:

A witness may not testify as to the “ultimate issue” of the case - an opinion that is actually an element of the crime necessary for conviction. An officer can testify to observations of the defendant’s driving without drawing conclusions assigned to the jury.

- In other words, you can DESCRIBE the driving, but you can't TESTIFY AS FACT that the actions of the defendant met the elements of the crime because that takes the jury's purpose away from them.

For a defendant to be found guilty of Attempting to Elude (RCW 46.61.024(1)) the ultimate issue that the trier of fact (jury or judge) needs to decide is whether the defendant “attempted to elude.”

5 EYEWITNESS IDENTIFICATION

EYEWITNESS IDENTIFICATION
Sexton v. Beaudreaux, No. 17-1106 (Jun. 28, 2018)
US SUPREME COURT

FACTS:

Suspect was arrested and tried for victim's murder following an argument. Two witnesses to the crime were able to describe the shooter. Both recognized him from attending middle school, but neither knew his name. W1 was provided a copy of their middle school yearbook and identifies the suspect as the shooter. Suspect was arrested on an unrelated crime 17 months later. W1 confirms the suspect was the shooter.

At that time, W2 is shown a photo lineup including a current photo of the suspect. W2 states that the photo of the suspect is "closest to the shooter," but falls short of a complete identification. W2 is shown a second photo array that includes an older photo of the suspect. He again fails to positively identify the suspect as the shooter, but states that his photo is "very close" to the shooter. Only the suspect appeared in both photo arrays. At a pretrial hearing, W2 provides a positive ID, stating the difference was that once he saw the suspect walk (which was distinctive), it clicked. At no time did investigators or the prosecutor tell W2 that the suspect was the shooter.

5 EYEWITNESS IDENTIFICATION

EYEWITNESS IDENTIFICATION
Sexton v. Beaudreaux, No. 17-1106 (Jun. 28, 2018)
US SUPREME COURT

PROCEDURAL FACTS:

Here, the State is appealing to the US Supreme Court to reverse the 9th Circuit Court of Appeals' finding in a civil federal *habeus corpus* claim by a prisoner that he was wrongfully convicted when his defense attorney failed to make a motion to suppress the photo lineup.

5 EYEWITNESS IDENTIFICATION

EYEWITNESS IDENTIFICATION
Sexton v. Beaudreaux, No. 17-1106 (Jun. 28, 2018)
US SUPREME COURT

TRAINING TAKEAWAY:

Identification procedures do not violate a suspect's due process where the procedure may have been less than ideal, but did not rise to the level of "impermissibly suggestive."

Less than ideal procedures:

- The eyewitness identification procedure was occurring more than 17 months after the incident.
- Two separate photo arrays were presented to the same witness within hours of each other.
- Both arrays featured a photo of the defendant, but the first was more current, and the second array used a photo more consistent with the time period when the original crime was committed.

The totality of the circumstances indicates that although falling short of best practice, this was not suggestive that it would "give rise to the very substantial likelihood of irreparable misidentification."

In both instances, the witness tentatively identified the suspect as the shooter, but was unable to confirm with certainty until he would be able to see him in person.

- The witness had closely observed the shooter at the time of the incident, and had even spoken with him after the shooting.
- Officers did not confirm the suspect's identity to the witness during or after the photo arrays.

5 EYEWITNESS IDENTIFICATION

EYEWITNESS IDENTIFICATION
Sexton v. Beaudreaux, No. 17-1106 (Jun. 28, 2018)
US SUPREME COURT

PRACTICE POINTERS:

- Avoid administering more than one identification procedure of a single suspect to the same witness. Additional ID's increase the likelihood of the photo array or line up being seen as overly suggestive.
- Don't rush into pulling your photos – take the time to ensure you have the most accurate representation of the suspect, as close to his or her appearance at the time of the incident.
- After administering the photo array or line up to the witness, enhance the reliability of their ID by having them provide a statement of how certain they are about the identification, and what led them to that level of certainty.

For a Full List of Eyewitness ID Guidelines:

[See, WA Prosecutor's Association 2015 Eyewitness ID Minimum Standards Policy](#)

6 ACCOMPLICE LIABILITY; DRIVE BY SHOOTING

MURDER; DRIVE BY SHOOTING

State v. Jameison, COA No. 34768-1-III (Jun. 28, 2018)

COURT OF APPEALS, DIV. III

FACTS:

Defendant rides in friend's car to attend a club. As they leave, a third man shoves one of the friend's acquaintances. Defendant's friend and this 3rd man get into a shouting argument in the street. The man jumps a fence to retrieve a gun from his car. Defendant and his friend return to their car and also retrieve their (lawfully possessed) firearms. The man and the friend then square off in the street while our defendant crouches, gun in hand, behind the car. The friend testifies that he believed he and the man would have a "fair fight" (meaning not a shootout).

The 3rd man then fires at our defendant's friend, and as one witness testifies, also in the direction of our defendant. The bullet strikes an innocent bystander who is then run over by a passing vehicle and killed. Our defendant returns fire, admitting to one or two shots, and one casing matching his gun is later found at the scene.

6 ACCOMPLICE LIABILITY; DRIVE BY SHOOTING

MURDER; DRIVE BY SHOOTING

State v. Jameison, COA No. 34768-1-III (Jun. 28, 2018)

COURT OF APPEALS, DIV. III

FACTS, cont.:

Our defendant is charged as an accomplice for the Murder of the bystander, and for 14 counts of Drive By Shooting to account for the other roughly 14 club goers present in the area at the time of the shooting. He moved to dismiss the Murder charge and 12 of the 14 Drive By Shooting counts under the reasoning that he only fired twice at most. The trial court granted the dismissal of the Murder charge and 12 of the 14 counts of Drive by Shooting. The State now appeals the dismissals to the Court of Appeals.

6 ACCOMPLICE LIABILITY; DRIVE BY SHOOTING

MURDER; DRIVE BY SHOOTING

State v. Jameison, COA No. 34768-1-III (Jun. 28, 2018)

COURT OF APPEALS, DIV. III

TRAINING TAKEAWAY #1:

Retrieving a lawfully possessed handgun and hiding behind a car in apparent self-defense against another man who was the first to arm himself during an argument with a third party does not support a charge of Murder via accomplice liability when the other man was the first to arm himself, the first to fire shots, and the one whose bullet killed the victim.

Also, person who is a victim of the primary defendant cannot then be an accomplice to the commission of that defendant's primary crime.

6 ACCOMPLICE LIABILITY; DRIVE BY SHOOTING

MURDER; DRIVE BY SHOOTING

[State v. Jameison](#), COA No. 34768-1-III (Jun. 28, 2018)

COURT OF APPEALS, DIV. III

TRAINING TAKEAWAY #1:

To be charged with Drive-By Shooting, the shooter must be in the car or in the immediate vicinity of the car that transported the shooter.

➤ Immediate vicinity is generally considered to be a few feet or yards.

- See, [State v. Vasquez](#) decided in March 2018, which held that 63 feet was too much distance between the car and the shooter for it to qualify as a drive-by shooting)

At the time he fired shots, the defendant was more than a few feet or yards from the car he arrived in, with another vehicle and a utility pole in between. These facts do not establish a sufficient nexus between the shooting and the car that is required for a charge of Drive-By Shooting.

TRAINING VIDEO

WATCH THOSE CARS (AND TRUCKS!)

[RCW 46.61.655](#) criminalizes situations where a driver is criminally negligent in failing to properly secure a load that leads to substantial bodily injury or property damage. The law is known as [Maria's Law](#) in honor of Maria Federici who was blinded and nearly killed when an unsecured load crashed through her windshield. Her mother, Robin Abel, has tirelessly dedicated herself to ensuring these crimes can be prosecuted in Washington (and across the nation).

WSP PSA Video (3 minutes) - <https://www.youtube.com/watch?v=QCYUjp0LATc>

Remember, enforcing traffic laws isn't solely up to the Traffic Unit! By engaging with your community during traffic contacts, you're not only addressing one of the most dangerous parts of your beat – the roadway, but you're also reaching the broadest sample of your community, and learning a lot in the process. Proactive, widespread visibility and professional contacts are a great way to increase community trust in law enforcement and the resulting safety of officers and community members. Making traffic enforcement a regular part of your shift is one way to get there!

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?

Courtney Popp
LED Online Training
Program

cpopp@cjtc.state.wa.us

