

FILED
SUPREME COURT
STATE OF WASHINGTON
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NO. 102174-7

SUPREME COURT OF THE STATE OF WASHINGTON

WASHINGTON ELECTION INTEGRITY COALITION
UNITED, DOUG BASLER AND TIMOFEY
SAMOYLENKO,

Appellants,

v.

JULIE WISE, King County Director of Elections, AND KING
COUNTY,

Respondents.

**RESPONDENT'S ANSWER TO
STATEMENT OF GROUNDS FOR
DIRECT REVIEW**

A. IDENTITY OF RESPONDING PARTY.

Respondents, King County Director of Elections Julie Wise and King County (hereinafter “King County”), seek the relief designated in part B.

B. STATEMENT OF RELIEF SOUGHT.

King County asks this Court to find that there are no grounds for direct review pursuant to RAP 4.2(a) and to transfer this case to the Court of Appeals.

C. FACTS RELEVANT TO STATEMENT OF GROUNDS FOR DIRECT REVIEW.

This lawsuit appears to be part of a nationwide effort to undermine trust in future elections. The plaintiffs freely admit that the overriding intent of their lawsuit was to conduct a belated undefined, unauthorized and unregulated “audit” of the 1.2 million King County ballots from the November 2020 general election in the same manner as the widely derided

“audit” that occurred in Maricopa County, Arizona, in 2021.¹

A- 37.² The November 2020 general election was, according to experts, the most secure, verified, and transparent election in American history.³ Yet, WEICU and their fellow collaborators continue to attack the results with spurious claims of wrongdoing by election officials. The coordinated effort⁴ to

¹ Jack Sellers, Chairman of the Board of Supervisors for Maricopa County, and a Republican, testified before Congress that those behind the Maricopa County “audit” “don’t care what the facts are, they just want to gain political power and raise money by fostering mistrust.” <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/Sellers%20Testimony.pdf>

² “A-__” herein refers to the Appendix submitted by WEICU.

³ David Becker, Executive Director and Founder of the Center for Election Innovation and Research, a nonpartisan nonprofit, testifying before Congress on October 7, 2021. <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/Becker%20Testimony.pdf>

⁴ For example, WEICU tries to rely on an anonymous and unsigned declaration that is purportedly from an individual named Terpeshore Maras filed in a Wisconsin lawsuit challenging the 2020 general election. The trial court struck the declaration. A-6. That same witness was relied on by the widely discredited former Donald Trump attorney Sidney Powell. *See* Statement of Grounds for Direct Review, at 7 (citing an “authenticated declaration of whistleblower Terpeshore Maras); “Sidney Powell’s secret intelligence contractor witness is a pro-Trump podcaster,” Washington Post, December 24, 2020 (identifying Terpeshore Maras-Lindeman as Powell’s “secret witness”).

flood the courts throughout the nation with these frivolous claims against election officials has constituted an unprecedented assault on American democracy.

1. The November 2020 General Election in King County.

In King County, the Department of Elections is managed by the Director of Elections, who is responsible for conducting all special and general elections held in the county. King County Code § 2.16.135. For election-related matters, the Director of Elections serves as the county auditor for King County. RCW 29A.04.025.

In the November 2020 general election, there were 1,420,898 active registered voters in King County.⁵ Of those active registered voters, 1,231,063 ballots were returned,

⁵ <https://kingcounty.gov/~media/depts/elections/results/2020/11/ballot-return-statistics.ashx?la=en> (kingcounty.gov) King County requested that the court take judicial notice pursuant to ER 201 of the background facts regarding the November 2020 general election. *Estate of McCartney v. Pierce County*, 22 Wn. App. 2d 665, 513 P.3d 119, 127 (2022) (courts may take judicial notice of official information posted on a governmental website, the accuracy of which is not in dispute).

resulting in a historic 86.64% rate of return.⁶ The King County results were certified on November 24, 2020.⁷

2. WEICU’s Public Disclosure Requests.

On August 31, 2021, Washington Election Integrity Coalition United (hereinafter “WEICU”) requested by email disclosure of “original ballots, ballot images, spoiled ballots, adjudication records, ballot envelopes and returned ballots for the November 3, 2020 General Election.” Supp. A- 63.⁸ On September 9, 2021, King County Elections advised WEICU that ballot and ballot images are exempt from public disclosure, provided a link to the adjudication logs, and offered to schedule a time for WEICU to inspect ballot envelopes. Supp. A-80. King County Elections also offered to scan the ballot envelopes, which numbered 1.2 million, and provide scanned

⁶ *Id.*; <https://kingcounty.gov/depts/elections/about-us/newsroom/news-releases/2020/November/24-general-certification.aspx>

⁷ *Id.*

⁸ “Supp A-__” refers to the Supplemental Appendix submitted by King County with this answer.

copies at the cost authorized by King County Code 2.12.280.A.2. Supp. A-82-83. King County Elections requested a deposit for the work. Supp. A-82.

On October 21, 2021, WEICU responded by stating that they would not be ordering any scanned copies of the ballot envelopes. Supp. A-111. WEICU also stated it would contact King County Elections if it chose to arrange viewing the envelopes but had not yet decided whether to proceed with that option. Supp. A-111. King County Elections requested that WEICU notify them by November 28, 2021, if they wished to inspect the envelopes in person. Supp. A-118. On November 3, 2021, WEICU requested clarification as to the logistics of viewing the 1.2 million ballot envelopes. Supp. A-125. King County Elections provided information as to the place and time for such inspection, and specified that pursuant to WAC 434-250-380, copying or photographing voter signatures would be prohibited during inspection. Supp. A-134. WEICU did not respond further or make arrangements for viewing the ballot

envelopes. Supp. A-60. As specified in the November 8, 2021 email to WEICU, King County Elections considered the envelope inspection portion of the request closed as of December 9, 2021, after more than 30 days passed without a response from WEICU stating they would like to view the envelopes. Supp. A-134.

3. This Frivolous Lawsuit Was Intended to Sow Distrust in Elections for Profit and Political Gain.

This case originally included WEICU plus nine pro se individuals termed “citizen” plaintiffs in the complaint. A-36. The pro se Plaintiffs alleged to be qualified King County voters who participated in the November 2020 general election. A-36-37. More than ten months after the election results were properly certified pursuant to state law, the plaintiffs filed this lawsuit alleging without factual support various misconduct and constitutional violations by Defendant Election Director Julie Wise. The pro se Plaintiffs asserted 15 claims. They averred in the complaint that they were not seeking to “de-certify” the

election, but to have the court declare that Director Wise and King County committed misconduct that tainted the results of the November 2020 election. A-52-54. They also sought declaratory and injunctive relief presumably regarding future elections, as well as damages. *Id.* Seven of those pro se plaintiffs voluntarily dismissed their claims against King County. Only Basler and Samoylenko remained as pro se Plaintiffs. A-3.

In contrast, Plaintiff WEICU asserted only one claim: violation of Washington’s Public Records Act, Chapter 42.56 RCW. A-46-48. In alleging violation of the Public Records Act, WEICU alleged in the complaint that it had requested that King County Elections provide “original ballots, ballot images, spoiled ballots, adjudication records, ballot envelopes and returned ballots.” A-46. WEICU alleged that King County Elections violated the Public Records Act by asserting that the requested documents are exempt from public disclosure. A-46.

Although WEICU is a non-profit corporation, the complaint was not signed by an attorney, in violation of CR 11(a).⁹ A-54.

The plaintiffs were straightforward in the complaint about their objective: “to conduct a full forensic audit of the requested public records in coordination with Jovan Hutton Pulitzer, inventor of kinematic artifact detection and Maricopa [C]ounty Arizona ballot auditor of 2020 General Election 2.1 million ballots.” A-37. Since they were not seeking to change the election results, had no factual basis for questioning the accuracy of the election results and failed to do so in a timely manner pursuant to state law, the only purpose of such an “audit” would be to fundraise and spread misinformation about the November 2020 election. The pro se Plaintiffs were likely recruited to take part in this lawsuit through WEICU’s website, www.weicu.org, which is using false claims in frivolous lawsuits to fundraise. *See e.g. WEICU v. Inslee*, Washington

⁹ *See Dutch Village Mall*, 162 Wn. App. 531, 539, 256 P.3d 1251 (2011) (“When a corporate entity presents a pleading not signed by an attorney, CR 11 is a proper basis for striking the pleading.”).

Supreme Court No. 100303-0 (sanctioning WEICU and Ms. Shogren).

4. The Superior Court Granted King County's Motion for Summary Judgment as to All Claims.

The lawsuit was removed to federal court on October 13, 2021. King County answered and filed counterclaims seeking declaratory relief that ballots, ballot images and voter signatures on ballot envelopes are exempt from public disclosure under the Public Records Act. A-63-86. King County also sought a permanent injunction precluding WEICU from obtaining ballots, ballot images and voter signatures on ballot envelopes. A-82.

On September 30, 2022, the federal court granted the plaintiffs' motion to remand the case to state court. Supp A-3. That court concluded that the plaintiffs lacked Article III standing to pursue their federal claims, and that the court would decline supplemental jurisdiction over the remaining state law claims. Because King County had filed counterclaims which

the court found “to have merit,” the matter was remanded rather than dismissed. Supp A-23.

Once remanded to the King County Superior Court, King County filed a motion for summary judgment seeking dismissal of all claims and declaratory and injunctive relief. Supp A-28. WEICU filed a “Motion for Declaratory Judgment on the Meaning and Application of RCW 29A.08.161 to the Instant Action” and a “Motion to Show Cause Re Public Records Request.” King County’s motion for summary judgment and plaintiff WEICU’s motions were noted simultaneously. In a detailed written ruling, the Honorable Leroy McCullough granted King County’s motion for summary judgment in part, dismissing all claims and issuing declaratory relief that “Director Wise and King County cannot as a matter of law disclose original, spoiled or returned ballots or images of those ballots to the public and cannot provide voter signatures on ballot envelopes for copying. A-7. The court denied King County’s request for injunctive relief. A-6. The court also

denied WEICU's motions on multiple alternative legal bases.

Supp A-153-65.

D. ARGUMENT.

This case does not meet the criteria set forth in RAP 4.2(a) for direct review of a superior court decision by this Court. Therefore, this Court should deny WEICU's request for direct review by this Court. There is no basis for direct review by this Court of the superior court decision because none of the criteria of RAP 4.2 are met in this case.

1. WEICU'S PRA Claim Does Not Raise A Fundamental And Urgent Issue Of Broad Public Import That Requires Prompt Determination By This Court.

WEICU argues that the trial court's dismissal of WEICU's PRA claim on summary judgment is "a fundamental and urgent issue of broad public import which requires prompt and ultimate determination" pursuant to RAP 4.2(a)(4).

Procedurally, aside from the issue of whether ballots and voters' signatures are exempt from public disclosure, an independent basis for dismissing WEICU's PRA claim was the fatal error in the verified complaint. The trial dismissed WEICU's PRA action because the complaint was not signed by an attorney. Although an individual has a right to self-representation, this right does not extend to representation on behalf of others or entities, including corporations. *Dutch Village Mall*, 162 Wn. App. 531, 535, 256 P.3d 1251 (2011) (citing RCW 2.48.170)); *Lloyd Enters., Inc. v. Longview Plumbing & Heat. Co.*, 91 Wn. App. 2d 697, 701, 958 P.2d 1035 (1998), *review denied*, 137 Wn. 2d 1020 (1999) (noting corporations appearing in court proceedings must be represented by an attorney). An attorney representing a party must sign pleadings and motions, and a failure to do so may result in the court striking the pleading or motion. CR 11(a). *Dutch Village Mall*, 162 Wn. App. at 539 ("When a corporate entity presents a pleading not signed by an attorney, CR 11 is a

proper basis for striking the pleading.”) (citing *Biomed Comm, Inc. v. Dep’t of Health, Bd. of Pharm.*, 146 Wn. App. 929, 938, 193 P.3d 1093 (2008)). No attorney signed the complaint on behalf of the WEICU, and despite ample time to fix this defect by filing an amended complaint signed by an attorney, no amended complaint was ever filed. The trial court properly struck the complaint and dismissed WEICU’s PRA claim because the complaint violated CR 11. A-7.

The trial court’s alternative ruling that ballots and voter signatures are not subject to disclosure is based on well-settled case law interpreting the PRA and election statutes. That interpretation has recently been explicitly approved by the legislature. As such, the PRA issue presented in this case, even if it had been raised in a proper complaint, is neither fundamental nor urgent, and does not require prompt determination by this Court.

The Washington Constitution includes a broad guarantee of ballot secrecy. Wash. Const. art. VI, § 6, states “All elections

shall be by ballot. The legislature shall provide for such method of voting as will secure to every elector absolute secrecy in preparing and depositing his ballot.” In a series of cases, Washington courts have held that ballots are exempt from public disclosure, due not only to the broad constitutional guarantee of ballot secrecy, but also the statutes and regulations that govern elections.

In *White v. Clark County*, 188 Wn. App. 622, 627, 354 P.3d 38 (2015), *review denied*, 185 Wn.2d 1009 (2016) (*White I*), the court held that pre-tabulated ballots are exempt from public disclosure. In that case, the plaintiff made a public records request for “scanned images of pre-tabulated ballots” from Clark County prior to certification of the election. The provisions of chapter 29A RCW required that ballots be kept secure prior to processing and after tabulation. *Id.* at 634. These statutes, however, resulted in a gap which the ballots that White requested fell within—ballot images generated during processing that had not yet been tabulated. *Id.* The court found

that the legislature had expressly delegated to the secretary of state the authority to “fill in the statutory gaps regarding the secrecy and security of ballots.” *Id.* Indeed, the legislature *required* the secretary to make such rules. *Id.* at 635. The court held that the secretary’s regulations, enacted in keeping with the constitution and the legislature’s grant of authority, constituted an “other statute” requiring exemption. *Id.* at 636. The court concluded that such ballots are exempt under the PRA, explaining:

Article VI, section 6 of the Washington Constitution, various sections of Title 29A RCW, and Secretary of State regulations adopted under express legislative authority make it clear that election ballots must be kept completely secure from the time of receipt through processing and tabulation. We hold that these provisions together constitute an “other statute” exemption to the PRA under RCW 42.56.070(1) and that the County did not violate the PRA by failing to disclose the pre-tabulated ballot images.

Id. at 627.

In *White v. Skagit County*, 188 Wn. App. 886, 890, 355 P.3d 1178 (2015), *review denied*, 185 Wn.2d 1009 (2016)

(*White II*), the same plaintiff filed suit against Skagit and Island Counties after they denied his request for electronic or digital image files of ballots received, cast, voted, or otherwise used in the 2013 general election. The court again held that ballots were exempt from public disclosure. *Id.* at 900. The court noted that “the legislature has gone into great detail to ensure that the process of collecting, counting, storing, and ultimately destroying ballots achieves the constitutional mandate for a secret ballot.” *Id.* at 894. The court explained:

The statutes that regulate the handling of ballots do not manifest a legislative intent to facilitate public inspection of voted ballots. They manifest a legislative intent to protect ballot secrecy by maintaining the integrity of ballot processing and tabulation.

Id. at 897. The court held that all ballots, including copies, are exempt from disclosure and that exemption is necessary to protect a vital governmental function. *Id.* at 898.

A few years later, in *White v. Clark County*, 199 Wn. App. 929, 931, 401 P.3d 375, 378 (2017), *review denied*, 189 Wn.2d 1031 (2018) (*White III*), White tried again, requesting

tabulated ballots from Clark County more than 60 days after they were tabulated. The court found that the exemption recognized in *White I* applied to tabulated ballots as well as pre-tabulated ballots. *Id.* at 932. The court found that the interplay of RCW 29A.60.110 (requiring ballot containers to be sealed and only accessed under limited circumstances) and WAC 434-261-045 (proscribing storage of ballots and “ballot images”) created an “other statute” exemption to the PRA. *Id.* at 938. The court reasoned that, viewing chapter 29A as a whole, there is a presumption against disclosure of election records unless otherwise stated:

[A]s Division One noted in *White II*, the legislature has also “specified that certain *nonballot* election records may be disclosed to the public.” The court noted that it would be superfluous for the legislature to single out specific types of elections records as subject to disclosure unless they were viewed as exceptions to the general rule of nondisclosure. *Id.* Further, because under RCW 29A.60.110 it is clear that tabulated ballots must remain sealed, there was no reason for the legislature to include an explicit exemption.

Id. at 936 (emphasis in original) (citations omitted). The court concluded that “tabulated ballots are exempt in their entirety from disclosure under the PRA,” and affirmed dismissal of White’s PRA complaint. *Id.* at 939.

In 2023 the Legislature made its agreement with the *White* decisions explicit by enacting Senate Bill 5459, which provides that “Voted ballots, voted ballot images, copies of voted ballots, photographs of voted ballots, facsimile images of voted ballots, or case vote records of voted ballots, starting at the time of ballot return, during storage per RCW 29A.60.110, and through destruction following any retention period or litigation” are “exempt from disclosure” under 42.56 RCW. Laws of 2023, Ch. 404, § 4 (effective July 23, 2023). *See First Student, Inc. v. DOR*, 194 Wn.2d 707, 718-19, 451 P.3d 1094 (2019) (legislative action in regard to a statute without repudiating a prior court interpretation of the statute is evidence of legislative acquiescence).

In regard to WEICU’s request for the ballot envelopes, RCW 42.56.420, amended in 2022, provided that voter signatures on ballot return envelopes are not subject to public disclosure. RCW 42.56.420(7)(a)(iii) previously read in relevant part:

The following information relating to security is exempt from disclosure under this chapter:

...

(7)(a) In addition to the information in subsection (4) of this section, the following related to election security:

...

(iii) Voter signatures on ballot return envelopes, ballot declarations, and signature correction forms, including the original documents, copies, and electronic images; and a voter's phone number and email address contained on ballot return envelopes, ballot declarations, or signature correction forms. The secretary of state, by rule, may authorize in-person inspection of unredacted ballot return envelopes, ballot declarations, and signature correction forms in accordance with RCW 29A.04.260.

See also Laws of 2022, ch. 140, sec. 1. The session law enacting this provision provided “The exemptions in sections 1 and 2 of this act apply to any public records request made prior to the effective date of this section for which disclosure of

records has not already been completed.” Laws of 2022, ch. 140, sec. 3. The act took effect on March 24, 2022. *Id.* In 2023, the legislature amended RCW 42.56.420 again, and moved the PRA exemptions to RCW 29A.04.260. That statute now provides, in relevant part:

(1) In accordance with RCW 42.56.420, the following are exempt from disclosure:

(a) Voter signatures on ballot return envelopes, ballot declarations, and signature correction forms, including the original documents, copies, and electronic images;

(b) A voter's phone number and email address contained on ballot return envelopes, ballot declarations, or signature correction forms.

(2) The secretary of state may, by rule, authorize in-person inspection of unredacted ballot return envelopes, ballot declarations, and signature correction forms. Except as provided under subsection (3) of this section, a person may not photocopy, photograph, or otherwise reproduce an image of the ballot return envelope, ballot declaration, or signature correction form. When inspecting a ballot return envelope, ballot declaration, or signature correction form in person, a person may not carry with them any materials or devices that could be used to record any voter information found on the ballot return envelope, ballot declaration, or signature correction form.

RCW 29.04.260.

Thus, under clear and settled Washington law, all ballots, ballot images and voter signatures are exempt from the type of public disclosure requested by WEICU in this case. The trial court properly concluded as a matter of law that the ballots, ballot images and voter signatures requested by WEICU are exempt from public disclosure.¹⁰ On that basis, the trial court properly dismissed WEICU's PRA claim and granted King County's request for declaratory relief.

Finally, WEICU's reliance on the standard for injunctive relief pursuant to RCW 42.56.540 is inapposite, as the trial court denied King County's motion for injunctive relief.

2. Ms. Shogren Does Not Represent the Pro Se Plaintiffs and Any Arguments Made in the Statement of Grounds for Direct Review Related to the Pro Se Plaintiffs' Claims Should Be Disregarded.

Ms. Shogren does not represent pro se plaintiffs Basler and Samoylenko. Basler and Samoylenko have not filed a

¹⁰ Consistent with the statute, King County offered to allow WEICU to inspect the ballot envelopes, but not make copies or take photographs. WEICU did not avail itself of the King County's offer to inspect the envelopes. Supp. A-134.

statement of grounds for direct review. The arguments made in WEICU's statement pertaining to the frivolous claims of election misfeasance brought only by Basler and Samoylenko are improper and should be disregarded by this Court.¹¹

3. The Frivolous Claims Brought by the Pro Se Plaintiffs, Unsupported by Any Competent Evidence, Do Not Raise Fundamental And Urgent Issues Of Broad Public Import That Require Prompt Determination By This Court.

WEICU argues that the trial court improperly granted summary judgment in favor of King County on the pro se plaintiffs' claims of election misfeasance. Even if this Court considered this argument, improperly made by WEICU's attorney on behalf of unrepresented parties, the pro se claims were unsupported by any competent evidence and do not raise fundamental and urgent issues that require prompt determination by this Court.

¹¹ See Statement of Grounds for Direct Review, at 16-19.

The trial court correctly determined that Basler and Samoylenko claims were untimely. Their claims brought under RCW 29A.68.013 were procedurally barred by that statute, which requires any claims of election-related wrongful acts or neglect of duty to be supported by an affidavit of an elector filed no later than ten days following certification of the election. A-3-4.

In addition, CR 56(e) provides, in relevant part, as follows:

When a motion for summary judgment is made and supported as provided in this rule, an adverse party may not rest upon the mere allegations or denials of a pleading, but a response, by affidavits or as otherwise provided in this rule, must set forth specific facts showing that there is a genuine issue for trial. If the adverse party does not so respond, summary judgment, if appropriate, shall be entered against the adverse party.

Basler and Samoylenko presented no evidence in response to King County's motion for summary judgment. The trial court properly granted summary judgment for King County on their claims. A-3.

Finally, the allegations pertaining to the November 2020 general election are moot and do not present a justiciable controversy or a proper basis for injunctive relief. The November 2020 general election was certified long before this lawsuit was brought. This Court can give Basler and Samoylenko no meaningful injunctive or declaratory relief.

E. CONCLUSION.

Direct review by this Court is not warranted pursuant to RAP 4.2(a). WEICU's request for direct review should be denied.

I certify that this document contains 3,915(4000 limit), excluding the parts of the document exempted from the word count by RAP 18.17.

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DATED this 28th day of July, 2023.

RESPECTFULLY submitted,

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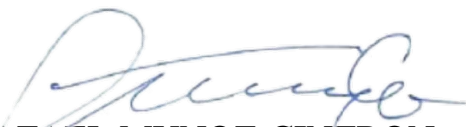
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I hereby certify that on August 2, 2023, I electronically filed the foregoing document with the Clerk of the Court using the Washington State Appellate Court's electronic filing system, which will send the same via email to the following parties:

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I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 2nd day of August, 2023, at Bellevue, Washington.


RAFAEL MUNOZ-CINTRON
Paralegal I
King County Prosecuting Attorney's Office

KING COUNTY PROSECUTING ATTORNEYS OFFICE CIVIL DIVISION

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