No. 79002-1-I

COURT OF APPEALS FOR THE STATE OF WASHINGTON
DIVISION I

CITY OF SEATTLE, SEATTLE POLICE DEPARTMENT &
SEATTLE CHIEF OF POLICE

Plaintiffs/Respondents,

v.

$19,560.48 U.S. CURRENCY,

Respondents *in rem*,

Intervening:

REBEKAH SHIN,

Claimant/Petitioner.

AMICUS CURIAE BRIEF OF THE AMERICAN CIVIL LIBERTIES UNION OF WASHINGTON AND THE WASHINGTON ASSOCIATION OF CRIMINAL DEFENSE LAWYERS

AMERICAN CIVIL LIBERTIES UNION OF WASHINGTON FOUNDATION

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I. IDENTITY AND INTEREST OF AMICI CURIAE

American Civil Liberties Union of Washington (ACLU)

The ACLU is a statewide, nonprofit, nonpartisan organization with over 135,000 members and supporters that is dedicated to the preservation and defense of constitutional and civil liberties. It has particular interest and expertise in the areas of drug policy, criminal justice, and civil asset forfeiture. The ACLU's interest in this matter is further detailed in the statement of interest contained in its Motion for Leave to File Amicus Curiae Brief filed herewith, which is hereby incorporated by reference.

Washington Association of Criminal Defense Lawyers (WACDL)

WACDL is a non-profit organization formed in 1987. It is dedicated to improving the quality and administration of justice. WACDL has over 800 members consisting of private defense lawyers, public defenders, and related professionals committed to preserving fairness and promoting a rational and humane criminal justice system, including civil asset forfeiture. WACDL is concerned about the fairness of the use of civil forfeiture proceedings in the criminal justice system, especially where law enforcement has a pecuniary interest in the outcome of the proceedings.

II. INTRODUCTION

Governmental deprivation of property under forfeiture statutes in drug cases has long been prone to government abuse because it is a source of revenue for the government. It is essential that courts enforce safeguards ensuring that forfeiture practices follow established law to protect the interests of people facing the deprivation of their property.

In 2009, the Washington state legislature strengthened notice safeguards when it amended the state's statute governing civil asset forfeiture in drug cases by changing the time period for when people who claim ownership of seized property must respond, so that the person has forty-five days from the "service of notice from the seizing agency." Laws of 2009, ch. 364.[1] Prior to this law change, the time period was forty-five days from the date of seizure, which meant that law enforcement could shrink the response window by not sending notice until fifteen days after the date of seizure. The 2009 legislation also added language that the "notice of claim may be served by any method authorized by law or court rule, but not limited to, service by first-class mail," and does not require certified mail.[2] These legislative changes were intended to add additional

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[1] *Available at* http://lawfilesext.leg.wa.gov/biennium/2009-10/Pdf/Bills/Session%20Laws/Senate/5160-S.SL.pdf?cite=2009%20c%20364%20%C2%A7%201;
[2] *Id*.

procedural safeguards for property owners who were facing the forfeiture of their property.

Recognizing the risks of abuse inherent in forfeiture, numerous courts have held that "[f]orfeitures are not favored and such statutes are construed strictly against the seizing agency." *Snohomish Reg'l Drug Task Force v. Real Prop.*, 150 Wn. App. 387, 392, 208 P.3d 1189 (2009). This is partly because, as noted above, civil asset forfeiture invites abuse because it is a source of generating revenue for law enforcement. As the Supreme Court recently ruled in a case dealing with asset forfeiture in a suspected drug crime, "[e]ven absent a political motive, fines may be employed 'in a measure out of accord with the penal goals of retribution and deterrence,' for 'fines are a source of revenue,' while other forms of punishment 'cost a State money.'" *Timbs v. Indiana*, 139 S. Ct. 682, 689, 203 L. Ed. 2d 11 (2019) (*quoting Harmelin v. Michigan*, 501 U. S. 957, 979, n. 9, 111 S. Ct. 2680, 115 L.Ed.2d 836 (1991) (opinion of Scalia, J.) ("it makes sense to scrutinize governmental action more closely when the State stands to benefit")).

In this case, the city of Seattle initiated civil asset forfeiture proceedings in 2015 utilizing the outdated notice procedures from the pre-2009 version of RCW 69.50.505—in other words, the notice procedure was six years out of date. Seattle claims that these are mere

"discrepancies" and that due process was met.[3] Seattle also made minimal efforts to provide notice to Ms. Shin, even though they readily knew how to find her. Worse, the notice provided by Seattle was misleading and not reasonably calculated to achieve notice, especially in light of the fact that Ms. Shin was homeless. This court should make clear that faulty notice procedures are unacceptable, violate due process, and that the law requires strict compliance with RCW 69.50.505. The court should rule accordingly.

III. STATEMENT OF THE CASE

In 2015, Rebekah Shin was homeless, living in her boyfriend's RV. On November 17, 2015, Ms. Shin was accused of violating the Uniform Controlled Substance Act, and was subsequently arrested. At the same time Seattle seized $19,560.48, to which Ms. Shin had a legal claim. Seattle then initiated forfeiture proceedings against the seized money.[4]

Specifically, on November 24, 2015, Seattle mailed a notice of seizure and intended forfeiture to Ms. Shin at 77 S. Washington Street, Seattle, WA 98104.[5] This is the address to Compass Housing Alliance, a service provider for homeless and low-income people that offers mailing services to thousands of clients. However, Seattle was aware of where and

[3] Respondent's brief, pp. 8-9.
[4] Petitioner's Opening brief, pp. 9-10.
[5] Respondent's brief, Appendix 3.

how to locate Ms. Shin. First, Seattle had Ms. Shin's cell phone number. Additionally, Seattle had knowledge that Ms. Shin slept in her boyfriend's RV, which had been parked around the 4600 block of 6th Ave. S., Seattle, WA, consistently over the course of three months. Ms. Shin also had an additional address on file with the Department of Licensing, 2312 NE 85th St., Seattle, WA 98115. Nevertheless, Seattle never provided Ms. Shin with any paperwork regarding her seized property, other than the letter to 77 S. Washington Street.[6]

Furthermore, Seattle provided incorrect and misleading information in the notice of seizure, which did not reflect the 2009 changes to RCW 69.50.505. Seattle used a pre-printed, standardized notice document that misstated the time-and-manner requirements required by statute in order to file a valid claim to seized property. Seattle's document stated:

> If you would like to make a claim because this property belongs to you and/or you are an interested party, you must notify the Seattle Police Department in writing of your claim of ownership or right to possession of the seized item(s). Send your written claim via certified mail addressed to the Chief of Police, Attn: Narcotics Section, Seattle Police Department, 610 Fifth Ave, P.O. Box 34986, Seattle, WA 98124-4986. In your letter please identify the property you are claiming. *Your letter must be received by the Seattle Police Department within 45 days of the date that that property was seized.* You will then receive notice of a

6 Petitioner's Opening brief, pp. 9-10.

> hearing date. If you fail to timely request a hearing, you will permanently lose the property and it will be kept by the City of Seattle and the Seattle Police Department.[7]

The statutory notice requirements, however, provide, *inter alia*:

> The notice of claim may be served by any method authorized by law or court rule including, but not limited to, service by first-class mail. Service by mail shall be deemed complete upon mailing within the forty-five day period following service of the notice….

RCW 69.50.505(5).[8] Ms. Shin learned about the seizure and forfeiture from her attorney, as Seattle failed to directly inform Ms. Shin of its actions.

On December 30, 2015, Ms. Shin filed a claim to her property with Seattle and removed the matter to King County District Court. The trial court subsequently concluded that "statutory requirements of Notice of Hearing have been satisfied, as well as the time for hearing."[9]

Following a bench trial, the trial court ordered Ms. Shin's property forfeited to Seattle. Ms. Shin timely appealed to King County Superior Court, which affirmed the trial court. This Court granted discretionary review based on the significant public interest involved.[10]

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7 Respondent's brief, Appendix 3.
8 Petitioner's Opening brief, p. 13.
9 *Id*. at 4, citing CP 708 ¶ 2.
10 *Id*. at 6-7.

IV. ARGUMENT

A. Case Law Interpreting and Legislative Amendments to RCW 69.50.505 Show that Courts Should Closely Scrutinize Civil Asset Forfeiture in Drug Cases Because they are Prone to Government Abuse.

As stated by the Washington Supreme Court, "the government has a strong financial incentive to seek forfeiture because the seizing law enforcement agency is entitled to keep or sell most forfeited property." *City of Sunnyside*, 188 Wn.2d 600, 617, 398 P.3d 1078 (2017) (citing RCW 69.50.505(7)). The U.S. Supreme Court also recognizes this incentive for abuse since forfeitures, like fines, are a source of revenue. *Timbs*, 139 S. Ct. at 689, 203 L. Ed. 2d 11.

This is worrisome because independent analysis has shown the Washington forfeiture laws favor law enforcement more than many other states. The Washington section of the Institute for Justice's 2015 report "Policing for Profit – The Abuse of Civil Asset Forfeiture," notes:

> Washington's civil forfeiture laws are among the nation's worst, earning a D-. State law only requires the government to prove by a preponderance of the evidence that property is associated with criminal activity in order to forfeit it. Furthermore, innocent owners bear the burden of demonstrating that they had nothing to do with the criminal activity associated with their property in order to recover it. Washington law enforcement agencies retain 90 percent of forfeiture proceeds—a considerable incentive to police for profit.[11]

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11 Dick M. Carpenter II et al., Inst. for Justice, *Policing for Profit – Abuse of Civil Asset Forfeiture* (2nd Ed. 2015) (Washington specific information *available at* http://ij.org/pfp-state-pages/pfp-Washington/) (last visited May 24, 2019).

The profit incentive is not hypothetical. Seattle acknowledges that "forfeiture cases provide revenue to SPD" and that the city's Law Department should receive personnel funding to help with an increase in these cases.[12] Seattle further acknowledges that "SPD has been providing funding for a temporary paralegal in 2018 to assist with the dramatic increase in real property, personal property narcotics and felony forfeiture cases."[13] In light of this admission that forfeiture actions are partly motivated by revenue, the court should ensure that corners are not being cut when it comes to protecting the interests of property owners.

Numerous courts have also held that "[f]orfeitures are not favored and such statutes are construed strictly against the seizing agency." *Snohomish*, 150 Wn. App. at 392*; see also, City of Walla Walla v. $401, 333.44*, 164 Wn. App. 236, 246, 262 P.3d 1239 (2011) (citing *Bruett v. Real Prop.*, 93 Wn. App. 290, 295, 968 P.2d 913 (1998) (citing *U.S. v. One 1936 Model Ford V-8 De Luxe Coach*, 307 U.S. 219, 226, 59 S. Ct. 861, 83 L. Ed. 1249 (1939))) ("Forfeitures are not favored; they should be enforced only when within both the letter and spirit of the law."). This

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[12] City of Seattle, Washington 2019 Adopted and 2020 Endorsed Budget, at 328 (2018), *available at* http://www.seattle.gov/financedepartment/documents/2019adoptedand2020endorsed-budgetbook-final.pdf (last visited May 24, 2019).

[13] *Id.* at 331.

principle should apply in this case and the notice provisions of RCW 69.50.505 should be construed in a manner that disfavors forfeiture and against the seizing agency.

Legislative reforms to RCW 69.50.505 also show that civil forfeiture practices can be abused and that the legislature has made amendments to protect the interests of property owners against unlawful seizures. For example, in 2001 the law was changed so that the burden of proof is on the law enforcement agency to prove that the property is subject to forfeiture and to provide that claimants are entitled to attorney fees if they prevail. These changes were intended to protect the interests of property owners.

Directly at issue in this case are changes made by the legislature in 2009 to the notice procedures for civil asset forfeiture drug cases. Laws of 2009, ch. 364.[14] Specifically, the 2009 law changed the time period for when people who claim ownership of seized property must respond, so that the person has forty-five days from the "service of notice from the seizing agency," instead of the date of the seizure itself. It also added language that the "notice of claim may be served by any method

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[14] *Available at* http://lawfilesext.leg.wa.gov/biennium/2009-10/Pdf/Bills/Session%20Laws/Senate/5160-S.SL.pdf?cite=2009%20c%20364%20%C2%A7%201;

authorized by law or court rule, but not limited to, service by first-class mail," and does not require certified mail.[15] According to the summary of testimony for this legislation, changes were needed because seizing agencies would sometimes wait fifteen days after seizure, then send notice, which significantly reduced the forty-five day time period.[16]

Despite these changes in the law to protect the interests of property owners, Seattle continued to use the old language until 2017, when the form was finally updated to correct some, but not all, of the misinformation. *See* discussion, *infra,* at 15-16. Undoubtedly, many people who did not get accurate notice information in Seattle forfeiture cases were dissuaded from responding because of the erroneous timelines and service issues in Seattle's Notice of Seizure and Intended Forfeiture. It also appears that similar inaccurate seizure notice documents are also still being used by law enforcement agencies across the state to this day.[17] This is unacceptable in light of the fact that the law was changed nearly a decade ago. But it is evidence that there may be a tendency for law enforcement agencies to cut corners in these cases, since they have an

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15 *Id.*

16 Lidia Mori, Staff of S. Comm. on the Judiciary, S.B. Rep. SSB 5160 (2009), *available at* http://lawfilesext.leg.wa.gov/biennium/2009-10/Pdf/Bill%20Reports/Senate/5160-S%20SBR%20HA%2009.pdf (last visited May 24, 2019).

17 Petitioner's Opening Brief, pp.15-17.

incentive to keep people from contesting seizure. After all, it is the same party responsible for providing notice - the law enforcement agencies - that get to keep most of the revenue if they are successful in a forfeiture action.[18]

Seattle admits that its notice was faulty, but claims it was upholding the "underlying purpose of RCW 69.50.505." However, in light of the judicial interpretations and the legislature's changes to civil asset forfeiture laws discussed above, this argument should be rejected and strict compliance with notice procedures should be required.

B. Notice Must Be Reasonably Calculated, Under All the Circumstances, to Advise a Party Facing Deprivation of a Property Right about the Requirements for Contesting the Deprivation.

The Due Process Clauses of the United States and Washington Constitutions provide that before the government may deprive an individual of life, liberty, or property, the individual must have had both notice and an opportunity to be heard. *Tellevik v. Real Prop.*, 120 Wn.2d 68, 82-83, 838 P.2d 111, 118 (1992); *Mullane v. Cent. Hanover Bank & Tr. Co.*, 339 U.S. 306, 313, 70 S. Ct. 652, 656–57, 94 L. Ed. 865 (1950); U.S. Const. Am. 14; Wash. Const. art. I, § 3.

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[18] RCW 69.50.505(10).

Courts define adequate notice as "notice reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections." *Mullane*, 339 U.S. at 314; *see also Wichert v. Cardwell*, 117 Wn.2d 148, 151, 812 P.2d 858, 859 (1991). Ultimately, notice statutes serve the purpose of ensuring due process. *See Mullane,* 339 U.S. at 313. In order to constitute adequate notice, the manner in which notice is given must actually inform the individual in such a way that enables them to "reasonably adopt to accomplish it." *Id.* at 315.

Property forfeitures must comply with the statutes authorizing them, including notice provisions. *U.S. v. Lane Motor Co.*, 344 U.S. 630, 73 S. Ct. 459, 97 L. Ed. 622 (1953); *State v. Alaway*, 64 Wn. App. 796, 800, 828 P.2d 591, 593 (1992). The government may not pursue forfeiture out of convenience or simply to raise revenue without statutory authority. *See generally Lane Motor Co., supra*.

Seattle did not provide adequate notice for due process or statutory purposes in this case, especially given Ms. Shin's circumstances and Seattle's knowledge of them. Rather than complying with the notice statute, Seattle materially misrepresented the law in three major ways: (1) indicating that certified mail was required for making a claim of ownership, whereas the statute enables filing via first class mail or delivering the documents in

person; (2) calculating the deadline to receive all claims based on the date of seizure, whereas the statute calculates the deadline based on the date of service of notice; and (3) requiring claims to be received by the stated deadline, whereas the statute requires claims to merely be mailed by the stated deadline. *See* RCW 69.50.505(5). Given these substantial misstatements of law, Seattle did not provide reasonable notice.

Seattle claims that there was no violation of due process, partly because Ms. Shin timely filed a claim of ownership, and fully participated in the hearing process.[19] However, Seattle should not get credit for this. It was advocacy by Ms. Shin's attorney that led to contesting the seizure. It would also be an absurd result for Ms. Shin to have a better prospect of prevailing in this case were she to have not responded to the seizure within the forty-five day timeline and then challenged the faulty notice forms being used by Seattle. Ms. Shin's timely response should be irrelevant for purposes of examining whether the City met its burden of complying with applicable notice procedures.

Seattle's reliance on *Storhoff* is misplaced. In *Storhoff,* a five member majority found that a Department of Licensing Notice of Revocation that incorrectly stated that the deadline to appeal was 10 days

[19] Respondent's Brief, p. 12

rather than the 15 days provided by statute did not rise to the level of a due process violation in the absence of a showing of actual prejudice, and deemed the failure in that case to be a mere "minor procedural error." *State v. Storhoff*, 133 Wn.2d 523, 525, 946 P.2d 783, 784 (1997). Notably, the four member concurrence took exception to the majority's characterization of the incorrect notices as a minor procedural error, and instead concluded that "procedural due process is not satisfied by a revocation notice bearing an incorrect number of days to appeal, coupled with an incomplete statutory cite." *Id.* at 533.

Storhoff is distinguishable for a number of reasons. First, the notice at issue here did not merely provide an incorrect time in which to file a claim. Instead, it was incorrect with respect to virtually every important issue, beginning with the manner in which a claim must be filed. Whereas the statute provides that a claim "may be served by any method authorized by law or court, including, but not limited to service by first class mail," the notice here incorrectly stated that the claim must be filed by certified mail. This places significant additional burdens on potential claimants, especially those who are low income or, as in this case, homeless, forcing a person to possibly chose between a meal or the cost of a certified letter. Even getting to a post office poses additional burdens for those without transportation.

Second, the notice here provided that "the notice must be received . . . within 45 days of the date that the property was seized." That, too, is incorrect. The statute provides that "service by mail shall be deemed complete upon mailing within the forty-five day period following service of the notice of seizure . . ." Thus, the claim must be made within 45 days of service of the notice of seizure, not within 45 days of the date that the property was seized, and the notice is deemed complete upon mailing, not upon receipt by the seizing agency.

Stunningly, Seattle, despite its claims to the contrary, is still providing misinformation in its Notices of Seizure. Seattle claims, at page 19 of its Answering Brief, that "The City's Notice has been in full compliance with RCW 69.50.505 since September 2017," citing in a footnote to a copy of its so-called revised compliant Notice. Thus, Seattle claims, "the Petitioner's arguments concerning the public's interest are misplaced." *Id*. However, Seattle's revised Notice still provides incorrect information a decade after the legislative changes. In the only highlighted portion of the revised Notice, potential claimants are incorrectly advised: **"Your notice of claim must be received by the Seattle Police Department within 45 days of the service of this Notice of Seizure and Intended Forfeiture."** The statute provides otherwise, stating that if the notice is served by mail, service is deemed complete upon mailing within

45 days of receipt of service of the notice of seizure, not upon receipt by the seizing agency within 45 days of service of the notice. If the Legal Department of the City of Seattle cannot get its notice of seizure correct even after being put on notice of its deficiencies, how can a claimant be expected to comply with the statutory claim requirements?

More importantly, unlike in *Storhoff*, there is typically no forum in which to later complain about inadequate notice and due process violations in a forfeiture proceeding. If the notice of claim is not timely submitted, the property is deemed forfeited, and there are no further hearings or proceedings required in order to perfect the forfeiture. RCW 69.50.505(4). So a claimant would likely never know that the notice issued to him or her provided incorrect manner and means of contesting the forfeiture. Contrast that to *Storhoff,* where in a prosecution for driving while license revoked, the State has the burden to prove that the revocation of the defendant's license complied with due process.

Finally, the defendants in *Storhoff* were habitual traffic offenders who "earn their special license status either by committing at least three serious criminal traffic offenses or by committing at least 20 traffic infractions." *Storhoff,* 133 Wn.2d at 531-32. Thus, the court was "reluctant to excuse the Defendants' serious criminal violations due to a minor procedural error that did not actually prejudice the Defendants." *Id.*

Contrast that with the situation here, where heightened due process scrutiny must apply because the seizing agency has a direct pecuniary interest in the outcome of forfeiture proceedings. *See Harmelin,* 501 U.S. 957, *supra.*

If the court agrees that there was no due process violation on Seattle's behalf because Ms. Shin allegedly had notice as evidenced by her reply to the forfeiture, this would send the message that Ms. Shin would have been better off not responding to the notice. Ms. Shin should not be penalized for her efforts. At the least, this court should hold that, going forward, material incorrect information in a Notice of Seizure and Intended Forfeiture does not comport with Due Process and invalidates the notice.

V. CONCLUSION

For the reasons set forth herein, this court should make clear that faulty notice procedures are unacceptable, violate due process, and that the law requires strict compliance with RCW 69.50.505's notice provisions and rule accordingly.

Respectfully submitted this 24th day of May, 2019.

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DECLARATION OF SERVICE

I, Kaya McRuer, hereby certify that on the date below, I caused the foregoing *Amicus Curiae Brief of The American Civil Liberties Union of Washington and the Washington Association of Criminal Defense Lawyers* and *Motion for Leave to File* to be served on the following in the manner indicated:

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

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